



1 ABUSE IN THE FIRST DEGREE (Count 3); SEXUAL ABUSE IN THE FIRST DEGREE (Count  
2 4); SEXUAL ABUSE IN THE FIRST DEGREE (Count 5); SEXUAL ABUSE IN THE FIRST  
3 DEGREE (Count 6); SEXUAL ABUSE IN THE FIRST DEGREE (Count 7); SEXUAL ABUSE IN  
4 THE FIRST DEGREE (Count 8); SEXUAL ABUSE IN THE FIRST DEGREE (Count 9);  
5 SEXUAL ABUSE IN THE FIRST DEGREE (Count 10); SEXUAL ABUSE IN THE FIRST  
6 DEGREE (Count 11); SEXUAL ABUSE IN THE FIRST DEGREE (Count 12); SEXUAL ABUSE  
7 IN THE FIRST DEGREE (Count 13); SEXUAL ABUSE IN THE FIRST DEGREE (Count 14);  
8 SEXUAL ABUSE IN THE FIRST DEGREE (Count 15); SEXUAL ABUSE IN THE FIRST  
9 DEGREE (Count 16); SEXUAL ABUSE IN THE FIRST DEGREE (Count 17); SEXUAL ABUSE  
10 IN THE FIRST DEGREE (Count 18); SEXUAL ABUSE IN THE FIRST DEGREE (Count 19);  
11 SEXUAL ABUSE IN THE FIRST DEGREE (Count 20); SEXUAL ABUSE IN THE FIRST  
12 DEGREE (Count 21); SEXUAL ABUSE IN THE FIRST DEGREE (Count 22); SODOMY IN THE  
13 FIRST DEGREE (Count 23); SODOMY IN THE FIRST DEGREE (Count 24); SODOMY IN THE  
14 FIRST DEGREE (Count 25); SODOMY IN THE FIRST DEGREE (Count 26); SODOMY IN THE  
15 FIRST DEGREE (Count 27); SODOMY IN THE FIRST DEGREE (Count 28); SODOMY IN THE  
16 FIRST DEGREE (Count 29); SODOMY IN THE FIRST DEGREE (Count 30); SODOMY IN THE  
17 FIRST DEGREE (Count 31); SODOMY IN THE FIRST DEGREE (Count 32); SODOMY IN THE  
18 FIRST DEGREE (Count 33); ATTEMPTED SODOMY IN THE FIRST DEGREE (Count 34);  
19 USING A CHILD IN A DISPLAY OF SEXUALLY EXPLICIT CONDUCT (Count 35); USING A  
20 CHILD IN A DISPLAY OF SEXUALLY EXPLICIT CONDUCT (Count 36); USING A CHILD IN  
21 A DISPLAY OF SEXUALLY EXPLICIT CONDUCT (Count 37); committed as follows:

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COUNT 1 - RAPE IN THE FIRST DEGREE - ORS 163.375 (b): That the said defendant, on or  
between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes County,  
Oregon, did unlawfully and knowingly engage in sexual intercourse with H.L., a child under the age  
of twelve years.

The State further alleges that the following aggravating factors were present:

The defendant was at least 18 years of age at the time he committed the above listed offense.

COUNT 2 - RAPE IN THE FIRST DEGREE - ORS 163.375 (b): That the said defendant, on or  
between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes County,  
Oregon, did unlawfully and knowingly engage in sexual intercourse with H.L., a child under the age  
of twelve years.

The State further alleges that the following aggravating factors were present:

The defendant was at least 18 years of age at the time he committed the above listed offense..

1 COUNT 3 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
2 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
3 County, Oregon, did unlawfully and knowingly subject H.L. a person under the age of 14 years, to  
4 sexual contact by touching a sexual or intimate part of H.L.

5 COUNT 4 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
6 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
7 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
8 sexual contact by touching a sexual or intimate part of H.L.

9 COUNT 5 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
10 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
11 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
12 sexual contact by touching a sexual or intimate part of H.L.

13 COUNT 6 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
14 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
15 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
16 sexual contact by touching a sexual or intimate part of H.L.

17 COUNT 7 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
18 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
19 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
20 sexual contact by touching a sexual or intimate part of H.L.

21 COUNT 8 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
22 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
23 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
sexual contact by touching a sexual or intimate part of H.L.

1 COUNT 9 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
2 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
3 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
4 sexual contact by touching a sexual or intimate part of H.L.

5 COUNT 10 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
6 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
7 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
8 sexual contact by touching a sexual or intimate part of H.L.

9 COUNT 11 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
10 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
11 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
12 sexual contact by touching a sexual or intimate part of H.L.

13 COUNT 12 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
14 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
15 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
16 sexual contact by touching a sexual or intimate part of H.L.

17 COUNT 13 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
18 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
19 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
20 sexual contact by touching a sexual or intimate part of H.L.

21 COUNT 14 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
22 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
23 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
sexual contact by touching a sexual or intimate part of H.L.

1 COUNT 15 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
2 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
3 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
4 sexual contact by touching a sexual or intimate part of H.L.

5 COUNT 16 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
6 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
7 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
8 sexual contact by touching a sexual or intimate part of H.L.

9 COUNT 17 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
10 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
11 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
12 sexual contact by touching a sexual or intimate part of H.L.

13 COUNT 18 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
14 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
15 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
16 sexual contact by touching a sexual or intimate part of H.L.

17 COUNT 19 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
18 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
19 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
20 sexual contact by touching a sexual or intimate part of H.L.

21 COUNT 20 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
22 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
23 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
sexual contact by touching a sexual or intimate part of H.L.

1 COUNT 21 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
2 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
3 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
4 sexual contact by touching a sexual or intimate part of H.L.

5 COUNT 22 - SEXUAL ABUSE IN THE FIRST DEGREE - ORS 163.427 (a): That the said  
6 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
7 County, Oregon, did unlawfully and knowingly subject H.L., a person under the age of 14 years, to  
8 sexual contact by touching a sexual or intimate part of H.L.

9 COUNT 23 - SODOMY IN THE FIRST DEGREE - ORS 163.405 (c): That the said defendant, on or  
10 between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes County,  
11 Oregon, did unlawfully and knowingly engage in deviate sexual intercourse with H.L., a child under  
12 the age of 12 years.

The State further alleges that the following aggravating factors were present:

The defendant was at least 18 years of age at the time he committed the above listed offense.

13 COUNT 24 - SODOMY IN THE FIRST DEGREE - ORS 163.405 (c): That the said defendant, on or  
14 between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes County,  
15 Oregon, did unlawfully and knowingly engage in deviate sexual intercourse with H.L., a child under  
16 the age of 12 years.

The State further alleges that the following aggravating factors were present:

The defendant was at least 18 years of age at the time he committed the above listed offense.

17 COUNT 25 - SODOMY IN THE FIRST DEGREE - ORS 163.405 (c): That the said defendant, on or  
18 between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes County,  
19 Oregon, did unlawfully and knowingly engage in deviate sexual intercourse with H.L., a child under  
20 the age of 12 years.

The State further alleges that the following aggravating factors were present:

The defendant was at least 18 years of age at the time he committed the above listed offense.

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3 COUNT 26 - SODOMY IN THE FIRST DEGREE - ORS 163.405 (c): That the said defendant, on or  
4 between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes County,  
Oregon, did unlawfully and knowingly engage in deviate sexual intercourse with H.L., a child under  
the age of 12 years.

5 The State further alleges that the following aggravating factors were present:

6 The defendant was at least 18 years of age at the time he committed the above listed offense.

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8 COUNT 27 - SODOMY IN THE FIRST DEGREE - ORS 163.405 (c): That the said defendant, on or  
9 between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes County,  
Oregon, did unlawfully and knowingly engage in deviate sexual intercourse with H.L., a child under  
the age of 12 years.

10 The State further alleges that the following aggravating factors were present:

11 The defendant was at least 18 years of age at the time he committed the above listed offense.

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13 COUNT 28 - SODOMY IN THE FIRST DEGREE - ORS 163.405 (c): That the said defendant, on or  
14 between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes County,  
Oregon, did unlawfully and knowingly engage in deviate sexual intercourse with H.L., a child under  
the age of 12 years.

15 The State further alleges that the following aggravating factors were present:

16 The defendant was at least 18 years of age at the time he committed the above listed offense.

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19 COUNT 29 - SODOMY IN THE FIRST DEGREE - ORS 163.405 (c): That the said defendant, on or  
20 between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes County,  
Oregon, did unlawfully and knowingly engage in deviate sexual intercourse with H.L., a child under  
the age of 12 years.

21 The State further alleges that the following aggravating factors were present:

22 The defendant was at least 18 years of age at the time he committed the above listed offense.

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3 COUNT 30 - SODOMY IN THE FIRST DEGREE - ORS 163.405 (c): That the said defendant, on or  
4 between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes County,  
Oregon, did unlawfully and knowingly engage in deviate sexual intercourse with H.L., a child under  
the age of 12 years.

5 The State further alleges that the following aggravating factors were present:

6 The defendant was at least 18 years of age at the time he committed the above listed offense.

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8 COUNT 31 - SODOMY IN THE FIRST DEGREE - ORS 163.405 (c): That the said defendant, on or  
9 between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes County,  
Oregon, did unlawfully and knowingly engage in deviate sexual intercourse with H.L., a child under  
the age of 12 years.

10 The State further alleges that the following aggravating factors were present:

11 The defendant was at least 18 years of age at the time he committed the above listed offense.

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14 COUNT 32 - SODOMY IN THE FIRST DEGREE - ORS 163.405 (c): That the said defendant, on or  
15 between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes County,  
Oregon, did unlawfully and knowingly engage in deviate sexual intercourse with H.L., a child under  
the age of 12 years.

16 The State further alleges that the following aggravating factors were present:

17 The defendant was at least 18 years of age at the time he committed the above listed offense.

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20 COUNT 33 - SODOMY IN THE FIRST DEGREE - ORS 163.405 (c): That the said defendant, on or  
21 between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes County,  
Oregon, did unlawfully and knowingly engage in deviate sexual intercourse with H.L., a child under  
the age of 12 years.

22 The State further alleges that the following aggravating factors were present:



1 The defendant was at least 18 years of age at the time he committed the above listed offense.  
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4 COUNT 34 - ATTEMPTED SODOMY IN THE FIRST DEGREE - ORS 163.405 (c): That the said  
5 defendant, on or between the 1st day of September, 2002 and the 30th day of June, 2004, in Deschutes  
6 County, Oregon, did unlawfully and intentionally attempt to engage in deviate sexual inter-course  
7 with H.L., a child under the age of 12 years.

8 COUNT 35 - USING A CHILD IN A DISPLAY OF SEXUALLY EXPLICIT CONDUCT - ORS  
9 163.670: That the said defendant, on or between the 1st day of September, 2002 and the 30th day of  
10 June, 2004, in Deschutes County, Oregon, did unlawfully and knowingly induce H.L. and S.W., a  
11 child, to engage in sexually explicit conduct for a person to observe.

12 COUNT 36 - USING A CHILD IN A DISPLAY OF SEXUALLY EXPLICIT CONDUCT - ORS  
13 163.670: That the said defendant, on or between the 1st day of September, 2002 and the 30th day of  
14 June, 2004, in Deschutes County, Oregon, did unlawfully and knowingly induce H.L. and S.W., a  
15 child, to engage in sexually explicit conduct for a person to observe.

16 COUNT 37 - USING A CHILD IN A DISPLAY OF SEXUALLY EXPLICIT CONDUCT - ORS  
17 163.670: That the said defendant, on or between the 1st day of September, 2002 and the 30th day of  
18 June, 2004, in Deschutes County, Oregon, did unlawfully and knowingly induce H.L. and S.W., a  
19 child, to engage in sexually explicit conduct for a person to observe.

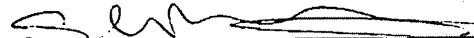
20  
21 Contrary to the statutes, regulations and such cases made and provided and against the peace and  
22 dignity of the State of Oregon.

23 Dated at Bend, Oregon this 16<sup>th</sup> day of December, 2014.

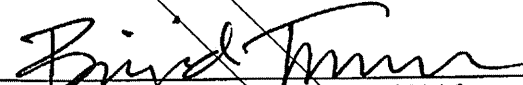
1 Witnesses subpoenaed and examined before the  
2 Grand Jury and for the State of Oregon:



a true bill

  
Foreperson of Grand Jury

Patrick J. Flaherty  
District Attorney

  
By BRIGID TURNER OSB: 065846  
Deputy District Attorney

Security Amount is \$ \_\_\_\_\_  
Let a Bench Warrant issue.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Circuit Judge

WARRANT

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