

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

Respondent.

Docket 79036 Document 2020-19217

INDEX CHRISTOPHER SENA Case No. 79036

PAGE NO.

Amended Criminal Complaint filed 10/22/14.....	7-13
Amended Information filed 10/12/16.....	1202-1246
Amended Judgment of Conviction filed 07/08/19	2399-2407
Audiovisual Transmission Equipment Appearance Request filed 02/06/19	2162-2164
Court's Exhibit 6 dated 02/07/19.....	6781
Criminal Complaint filed 09/19/14.....	1-6
Defendant's Bench Memorandum Regarding Child Pornography Charges filed 02/15/19.....	2236-2246
Defendant's Memorandum of Points and Authorities Opposing Bindover After Preliminary Hearing filed 09/19/15.....	917-933
Defendant's Motion for Juror Questionnaire Date of Hrg: 01/03/18.....	1679-1701
Defendant's Motion for Production of Co-Offenders' PSIs and Related Discovery Date of Hrg: 08/22/18.....	1941-1950
Defendant's Motion to Continue Trial Date of Hrg: 09/13/17.....	1529-1545
Defendant's Notice of Expert Witnesses filed 12/29/17	1731-1732
Defendant's Notice of Expert Witnesses filed 08/13/18	1891-1896
Defendant's Notice of Witnesses filed 01/08/18.....	1733-1735
Defendant's Proposed Jury Instructions Not Used At Trial filed 02/15/19	2214-2235
District Court Minutes from 01/05/16 through 05/28/19	2408-2486
Ex Parte Motion and Order to Remand Witness Into Custody filed 02/06/19.....	2167-2168
Ex Parte Motion and Order to Remand Witness Into Custody filed 02/06/19.....	2169-2170
Ex Parte Order for Transcript filed 11/03/17.....	1552-1553
Ex Parte Order for Transcript filed 03/09/18.....	1741-1742
Ex Parte Order for Transport filed 12/05/17	1675-1676
Findings of Fact, Conclusions, of Law and Order Date of Hrg: 10/12/16.....	1251-1301

1	Fourth Amended Information filed 02/13/19	2171-2213
2	Information filed 12/16/15.....	1008-1052
3	Instructions to the Jury filed 02/21/19	2264-2358
4	Judgment of Conviction filed 05/31/19	2384-2392
5	Justice Court Minutes from 09/19/14 through 12/15/15	77-111
6	Motion for Stay Pending Resolution of Defendant's Petition for Writ of Mandamus/Prohibition	
7	Date of Hrg: 12/11/17	1634-1641
8	Motion to Compel Production of Discovery & Brady Material	
9	Date of Hrg: 08/23/17	1302-1354
10	Motion to Continue Trial Date	
11	Date of Hrg: 10/26/16.....	1247-1250
12	Motion to Continue Trial Date	
13	Date of Hrg: 01/10/18.....	1736-1739
14	Motion to Dismiss Counts for Violation of Statute of Limitations	
15	Date of Hrg: 08/23/17	1390-1454
16	Motion to Sever	
17	Date of Hrg: 12/04/17	1554-1583
18	Notice of Appeal filed 06/14/19	2393-2398
19	Opposition to Motion to Strike Expert Witness Notice	
20	Date of Hrg: 08/22/18	1934-1938
21	Opposition to State's Motion to Amend Criminal Information filed 10/05/16	1195-1201
22	Opposition to State's Motion to Clarify and/or Motion to Reconsider	
23	Date of Hrg: 08/22/18	1849-1890
24	Order filed 03/31/16	1093-1094
25	Order Denying Defendant's Motions of December 12/11/17	
26	Date of Hrg: 12/11/17	1677-1678
27	Order for Production of Inmate filed 07/10/15.....	115-116
28	Order for Production of Inmate filed 08/22/17.....	1524-1525
	Order for Production of Inmate filed 08/25/17.....	1526-1527
	Order for Production of Inmate filed 02/01/19.....	2158-2159
	Order for Production of Inmate filed 02/04/19.....	2160-2161
	Order for Production of Inmate filed 02/06/19.....	2165-2166

1	Order Granting State's Motion in Limine to Present the Complete Story of the	
2	Crime and Motion to Admit Evidence of Other Sexual Offenses and or	
3	Evidence of Other Crimes, Wrongs or Acts	
4	Date of Hrg: 09/25/17	1522-1523
5	Order Granting State's Motion to Strike Expert Witness	
6	Date of Hrg: 08/22/18	1939-1940
7	Order to Show Cause RE: Contempt filed 09/06/18	2011-2039
8	Petition for Writ of Habeas Corpus filed 03/18/16	1053-1092
9	Receipt of Copy filed 08/23/17	1528
10	Receipt of Copy filed 09/13/17	1551
11	Receipt of Copy filed 03/08/18	1740
12	Receipt of Copy filed 09/05/18	2010
13	Receipt of Copy filed 09/18/18	2040
14	Receipt of Copy filed 12/17/18	2045-2046
15	Receipt of Copy filed 01/23/19	2062
16	Reply to State's Opposition to Motion to Dismiss Counts for	
17	Violation of Statute of Limitations filed 08/28/17	1455-1461
18	Return to Writ of Habeas Corpus	
19	Date of Hrg: 05/16/16	1095-1141
20	Second Amended Criminal Complaint filed 12/18/14	14-33
21	Second Amended Information filed 09/05/18	1959-2001
22	State's Amended Fourth Supplemental Notice of	
23	Witnesses and/or Expert Witnesses filed 01/22/19	2047-2061
24	State's Fourth Supplemental Notice of Witnesses and/or	
25	Expert Witnesses filed 12/12/18	2041-2044
26	State's Memorandum of Points and Authorities in Support of	
27	Bindover After Preliminary Hearing	
28	Date of Hrg: 11/20/15	827-916
29	State's Motion for Clarification and Supplement to Prior Motion in Limine to	
30	Present the Complete Story of the Crime and Motion to Admit Evidence of Other	
31	Sexual Crimes and/or Evidence of Other Crimes, Wrongs or Acts	
32	Date of Hrg: 08/27/18	1764-1848
33	State's Motion to Strike Defendant's Notice of Expert Witnesses	
34	Date of Hrg: 09/05/18	2002-2009

1	State's Notice of Motion and Motion in Limine to Present the Complete	
2	Story of the Crime and Motion to Admit Evidence of Other Sexual	
3	Offenses and/or Evidence of Other Crimes, Wrongs or Acts	
4	Date of Hrg: 08/06/17	1462-1521
5	State's Notice of Motion and Motion to Strike Defendant's Notice of	
6	Expert Witnesses, on an Order Shortening Time	
7	Date of Hrg: 08/15/18	1897-1933
8	State's Notice of Witnesses and/or Expert Witnesses filed 08/08/17	1371-1389
9	State's Opposition to Defendant's Motion for Directed Verdict	
10	Date of Hrg: 02/15/19	2247-2252
11	State's Opposition to Defendant's Motion for Juror Questionnaire	
12	Date of Hrg: 01/03/18	1702-1730
13	State's Opposition to Defendant's Motion for Stay Pending Resolution of	
14	Defendant's Petition for Writ of Mandamus/Prohibition	
15	Date of Hrg: 12/11/17	1642-1674
16	State's Opposition to Defendant's Motion to Compel	
17	Production of Discovery and Brady Material	
18	Date of Hrg: 08/16/17	1355-1370
19	State's Opposition to Defendant's Motion to Continue Trial	
20	Date of Hrg: 09/06/17	1546-1550
21	State's Opposition to Defendant's Motion to Sever	
22	Date of Hrg: 12/04/17	1584-1633
23	State's Second Supplemental Notice of Witnesses and/or	
24	Expert Witnesses filed 08/31/18	1951-1954
25	State's Supplemental Memorandum Points and Authorities	
26	Opposing Bindover After Preliminary Hearing	
27	Date of Hrg: 12/14/15	934-966
28	State's Supplemental Notice of Witnesses and/or	
	Expert Witnesses filed 07/17/18	1743-1763
	State's Third Supplemental Notice of Witnesses and/or	
	Expert Witnesses filed 09/04/18	1955-1958
	State's Trial Memorandum filed 02/15/19	2253-2263
	Stipulation and Order Regarding Discovery of	
	Child Pornographic Materials filed 02/19/15	112-114
	Supplement to State's Return to Writ of Habeas Corpus and	
	Motion to Amend Criminal Information	
	Date of Hrg: 08/10/16	1142-1194
	Third Amended Criminal Complaint filed 12/15/15	34-76

1	Third Amended Information filed 01/23/19	2115-2157
2	Verdict filed 02/21/19.....	2359-2383
3		
4	<u>TRANSCRIPTS</u>	
5	Recorder's Transcript	
6	JURY TRIAL DAY 1	
6	Date of Hrg: 09/05/18.....	2722-3031
7	Recorder's Transcript	
8	JURY TRIAL DAY 2	
8	Date of Hrg: 09/06/18.....	3032-3185
9	Recorder's Transcript	
10	JURY TRIAL DAY 3	
10	Date of Hrg: 09/07/18.....	3186-3213
11	Recorder's Transcript	
12	JURY TRIAL DAY 1	
12	Date of Hrg: 01/28/19.....	3247-3467
13	Recorder's Transcript	
14	JURY TRIAL DAY 2	
14	Date of Hrg: 01/29/19.....	3468-3778
15	Recorder's Transcript	
16	JURY TRIAL DAY 3	
16	Date of Hrg: 01/30/19.....	3779-3988
17	Recorder's Transcript	
18	JURY TRIAL DAY 4	
18	Date of Hrg: 01/31/19.....	3989-4360
19	Recorder's Transcript	
20	JURY TRIAL DAY 5	
20	Date of Hrg: 02/01/19.....	4361-4455
21	Recorder's Transcript	
22	JURY TRIAL DAY 6	
22	Date of Hrg: 02/04/19.....	4456-4641
23	Recorder's Transcript	
24	JURY TRIAL DAY 7	
24	Date of Hrg: 02/05/19.....	4642-4957
25	Recorder's Transcript	
26	JURY TRIAL DAY 8	
26	Date of Hrg: 02/06/19.....	4958-5221
27	Recorder's Transcript	
28	JURY TRIAL DAY 9	
28	Date of Hrg: 02/07/19.....	5222-5385

1	Recorder's Transcript JURY TRIAL DAY 10	
2	Date of Hrg: 02/08/19.....	5386-5699
3	Recorder's Transcript JURY TRIAL DAY 11	
4	Date of Hrg: 02/11/19.....	5700-5979
5	Recorder's Transcript JURY TRIAL DAY 12	
6	Date of Hrg: 02/13/19.....	5980-6200
7	Recorder's Transcript JURY TRIAL DAY 13	
8	Date of Hrg: 02/14/19.....	6201-6399
9	Recorder's Transcript JURY TRIAL DAY 14	
10	Date of Hrg: 02/15/19.....	6400-6432
11	Recorder's Transcript JURY TRIAL DAY 15	
12	Date of Hrg: 02/19/19.....	6433-6676
13	Recorder's Transcript JURY TRIAL DAY 16	
14	Date of Hrg: 02/20/19.....	6677-6682
15	Recorder's Transcript JURY TRIAL DAY 17	
16	Date of Hrg: 02/21/19.....	6683-6711
17	Recorder's Transcript All Pending Motions	
18	Date of Hrg: 08/22/18.....	2621-2690
19	Recorder's Transcript Arraignment	
20	Date of Hrg: 01/20/16.....	2490-2499
21	Recorder's Transcript Calendar Call	
22	Date of Hrg: 08/29/18.....	2691-2721
23	Recorder's Transcript Calendar Call	
24	Date of Hrg: 01/23/19.....	3240-3246
25	Recorder's Transcript Calendar Call and All Pending Motions	
26	Date of Hrg: 09/06/17.....	2549-2561
27	Recorder's Transcript Defendant's Motion for Juror Questionnaire	
28	Date of Hrg: 01/03/18.....	2569-2573

1	Recorder's Transcript	
2	Defendant's Motion to Compel Production of	
3	Discovery and Brady Material	
	Date of Hrg: 08/16/17	2538-2546
4	Recorder's Transcript	
5	Defendant's Motion to Dismiss Counts for	
6	Violation of Statute of Limitations	
	Date of Hrg: 08/23/17	2547-2548
7	Recorder's Transcript	
8	Defendant's Motion to Dismiss Counts for	
9	Violation of Statute of Limitations	
	Date of Hrg: 08/30/17	6782-6805
10	Recorder's Transcript	
11	Defendant's Motion to Sever	
12	Date of Hrg: 12/04/17	2562-2565
13	Recorder's Transcript	
14	Defendant's Motion to Stay Pending Resolution of	
15	Defendant's Petition for Writ of Mandamus/Prohibition;	
16	Defendant's Motion to Sever	
17	Date of Hrg: 12/11/17	2566-2568
18	Recorder's Transcript	
19	Defendant's Petition for Writ of Habeas Corpus	
20	Date of Hrg: 04/04/16	2500-2503
21	Recorder's Transcript	
22	Defendant's Petition for Writ of Habeas Corpus	
23	Date of Hrg: 06/06/16	2504-2506
24	Recorder's Transcript	
25	Defendant's Petition for Writ of Habeas Corpus	
26	Date of Hrg: 07/13/16	2507-2510
27	Recorder's Transcript	
28	Further Proceedings: Defendant's Petition for	
	Writ of Habeas Corpus	
	Date of Hrg: 10/12/16	2516-2524
29	Recorder's Transcript	
30	Further Proceedings: Defendant's Petition for	
31	Writ of Habeas Corpus-Count 97	
32	Date of Hrg: 08/29/16	2511-2515
33	Recorder's Transcript	
34	Initial Arraignment	
35	Date of Hrg: 01/05/16	2487-2489
36	Recorder's Transcript	
37	Pre-Trial Conference	
38	Date of Hrg: 08/09/17	2528-2537

1	Recorder's Transcript	
2	Pre-Trial Conference	
	Date of Hrg: 08/01/18.....	2590-2597
3	Recorder's Transcript	
4	Pre-Trial Conference	
	Date of Hrg: 12/12/18.....	3223-3228
5	Recorder's Transcript	
6	Sentencing	
	Date of Hrg: 04/29/19.....	6712-6723
7	Recorder's Transcript	
8	Sentencing	
	Date of Hrg: 05/28/19.....	6724-6780
9	Recorder's Transcript	
10	Show Cause Hearing	
	Date of Hrg: 09/26/18.....	3214-3222
11	Recorder's Transcript	
12	Status Check: Expert Issues	
	Date of Hrg: 12/19/18.....	3229-3239
13	Recorder's Transcript	
14	Status Check: Juror Questionnaire	
	Date of Hrg: 01/31/18.....	2580-2585
15	Recorder's Transcript	
16	Status Check: Juror Questionnaire	
	Date of Hrg: 08/15/18.....	2598-2620
17	Recorder's Transcript	
18	Status Check: Outstanding Discover/Finalizing Jury Questionnaire	
	Date of Hrg: 03/07/18.....	2586-2589
19	Recorder's Transcript	
20	Status Check: Trial Setting; Defendant's	
	Motion for Juror Questionnaire	
	Date of Hrg: 01/24/18.....	2574-2579
21	Recorder's Transcript	
22	Status Check: Trial Setting; Defendant's	
	Motion to Continue Trial Date	
23	Date of Hrg: 10/26/16.....	2525-2527
24	Reporter's Transcript	
25	Argument and Bindover	
	Date of Hrg: 12/15/15.....	967-1007
26	Reporter's Transcript	
27	Motions	
	Date of Hrg: 07/13/15.....	117-121
28		

1	Reporter's Transcript	
	Preliminary Hearing Vol. I	
2	Date of Hrg: 08/27/15.....	122-223
3	Reporter's Transcript	
	Preliminary Hearing Vol. II	
4	Date of Hrg: 08/28/15.....	224-557
5	Reporter's Transcript	
	Preliminary Hearing Vol. III	
6	Date of Hrg: 09/03/15.....	558-705
7	Reporter's Transcript	
	Preliminary Hearing Vol. IV	
8	Date of Hrg: 09/18/15.....	706-826
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

FILED
SEP 19 1 26 PM '14

THE STATE OF NEVADA,

Plaintiff,

-vs-

CHRISTOPHER SENA #0779849,

Defendant.

JUSTICE COURT SG
LAS VEGAS NEVADA

CASE NO: 14F14785X

DEPUTY

DEPT NO: 3

CRIMINAL COMPLAINT

The Defendant above named having committed the crimes of CHILD ABUSE, NEGLECT, OR ENDANGERMENT (Category B Felony - NRS 200.508(1) - NOC 55226); SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE (Category A Felony - NRS 200.364, 200.366 - NOC 50105); LEWDNESS WITH A CHILD UNDER THE AGE OF 14 (Category A Felony - NRS 201.230 - NOC 50975); SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE (Category A Felony - NRS 200.364, 200.366 - NOC 50106) and INCEST (Category A Felony - NRS 201.180 - NOC 50957), in the manner following, to-wit: That the said Defendant, on or between May 22, 2001 and May 31, 2014, at and within the County of Clark, State of Nevada,

COUNT 1 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT

did on or between May 22, 2001 and May, 21, 2004 wilfully, unlawfully, and feloniously cause a child under the age of 18 years, to-wit: A.S., being approximately 11 year(s) of age, to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature and/or cause the said A.S. to be placed in a situation where she might have suffered unjustifiable physical pain or mental suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature by forcing the said A.S. to participate in sexual acts with the Defendant and with others.

COUNT 2 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT

did on or between May 22, 2001 and May, 21, 2004 wilfully, unlawfully, and feloniously cause a child under the age of 18 years, to-wit: A.S., being approximately 11

14F14785X
CRM
Criminal Complaint
4261699



1 year(s) of age, to suffer unjustifiable physical pain or mental suffering as a result of abuse or
2 neglect, to wit: physical injury of a non accidental nature and/or cause the said A.S. to be
3 placed in a situation where she might have suffered unjustifiable physical pain or mental
4 suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature by
5 forcing the said A.S. to participate in sexual acts with the Defendant and with others.

6 COUNT 3 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT

7 did on or between May 22, 2001 and May, 2004 wilfully, unlawfully, and feloniously
8 cause a child under the age of 18 years, to-wit: A May, 21, 2004.S., being approximately 11
9 year(s) of age, to suffer unjustifiable physical pain or mental suffering as a result of abuse or
10 neglect, to wit: physical injury of a non accidental nature and/or cause the said A.S. to be
11 placed in a situation where she might have suffered unjustifiable physical pain or mental
12 suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature by
13 forcing the said A.S. to participate in sexual acts with the Defendant and with others.

14 COUNT 4 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT

15 did on or between May 22, 2001 and May, 21, 2004 wilfully, unlawfully, and
16 feloniously cause a child under the age of 18 years, to-wit: A.S., being approximately 11
17 year(s) of age, to suffer unjustifiable physical pain or mental suffering as a result of abuse or
18 neglect, to wit: physical injury of a non accidental nature and/or cause the said A.S. to be
19 placed in a situation where she might have suffered unjustifiable physical pain or mental
20 suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature by
21 forcing the said A.S. to participate in sexual acts with the Defendant and with others.

22 COUNT 5 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT

23 did on or between May 22, 2001 and May, 21, 2004 wilfully, unlawfully, and
24 feloniously cause a child under the age of 18 years, to-wit: A.S., being approximately 11
25 year(s) of age, to suffer unjustifiable physical pain or mental suffering as a result of abuse or
26 neglect, to wit: physical injury of a non accidental nature and/or cause the said A.S. to be
27 placed in a situation where she might have suffered unjustifiable physical pain or mental
28 suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature by

1 forcing the said A.S. to participate in sexual acts with the Defendant and with others.

2 COUNT 6 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

3 did on or between May 22, 2001 and May 21, 2004 then and there wilfully, unlawfully,
4 and feloniously sexually assault and subject A.S., a female child under fourteen years of age,
5 to sexual penetration, to-wit: anal intercourse: by placing his penis into the anal opening of
6 the said A.S., against her will, or under conditions in which Defendant knew, or should have
7 known, that A.S. was mentally or physically incapable of resisting or understanding the nature
8 of Defendant's conduct.

9 COUNT 7 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

10 did on or between May 22, 2001 and May 21, 2004 then and there wilfully, unlawfully,
11 and feloniously sexually assault and subject A.S., a female child under fourteen years of age,
12 to sexual penetration, to-wit: anal intercourse: by placing his penis into the anal opening of
13 the said A.S., against her will, or under conditions in which Defendant knew, or should have
14 known, that A.S. was mentally or physically incapable of resisting or understanding the nature
15 of Defendant's conduct.

16 COUNT 8 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

17 did on or between May 22, 2001 and May 21, 2004 then and there wilfully, unlawfully,
18 and feloniously sexually assault and subject A.S., a female child under fourteen years of age,
19 to sexual penetration, to-wit: anal intercourse: by placing his penis into the anal opening of
20 the said A.S., against her will, or under conditions in which Defendant knew, or should have
21 known, that A.S. was mentally or physically incapable of resisting or understanding the nature
22 of Defendant's conduct.

23 COUNT 9 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

24 did on or between May 22, 2001 and May 22, 2004 then and there wilfully, lewdly,
25 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
26 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by
27 caressing and/or fondling the said A.S.'S breasts, with the intent of arousing, appealing to, or
28 gratifying the lust, passions, or sexual desires of said Defendant, or said child.

1 COUNT 10 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

2 did on or between May 22, 2001 and May 22, 2004 then and there wilfully, lewdly,
3 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
4 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by
5 caressing and/or fondling the said A.S.'S breasts, with the intent of arousing, appealing to, or
6 gratifying the lust, passions, or sexual desires of said Defendant, or said child.

7 COUNT 11 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

8 did on or between May 22, 2001 and May 22, 2004 then and there wilfully, lewdly,
9 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
10 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by
11 caressing and/or fondling the said A.S.'S breasts, with the intent of arousing, appealing to, or
12 gratifying the lust, passions, or sexual desires of said Defendant, or said child.

13 COUNT 12 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

14 did on or between May 22, 2004 and May 21, 2006 then and there wilfully, unlawfully,
15 and feloniously sexually assault and subject A.S., a female child under sixteen years of age, to
16 sexual penetration, to-wit: placing his penis into the genital opening of the said A.S., against
17 her will, or under conditions in which Defendant knew, or should have known, that the said
18 victim was mentally or physically incapable of resisting or understanding the nature of
19 Defendant's conduct.

20 COUNT 13 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

21 did on or between May 22, 2004 and May 21, 2006 then and there wilfully, unlawfully,
22 and feloniously sexually assault and subject A.S., a female child under sixteen years of age, to
23 sexual penetration, to-wit: placing his penis into the genital opening of the said A.S., against
24 her will, or under conditions in which Defendant knew, or should have known, that the said
25 victim was mentally or physically incapable of resisting or understanding the nature of
26 Defendant's conduct.

27 COUNT 14 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

28 did on or between May 22, 2004 and May 21, 2006 then and there wilfully, unlawfully,

1 and feloniously sexually assault and subject A.S., a female child under sixteen years of age, to
2 sexual penetration, to-wit: placing his penis into the genital opening of the said A.S., against
3 her will, or under conditions in which Defendant knew, or should have known, that the said
4 victim was mentally or physically incapable of resisting or understanding the nature of
5 Defendant's conduct.

6 COUNT 15 - INCEST

7 did on or between May 22, 2001 and May 21, 2014 then and there wilfully, unlawfully,
8 and feloniously commit fornication or adultery with A.S., the daughter; the Defendant and
9 A.S. being within the degree of consanguinity within which marriages are declared by law to
10 be incestuous and void; the Defendant committing the crime by engaging in a sexual act with
11 the said A.S.

12 COUNT 16 - INCEST

13 did on or between May 22, 2001 and May 21, 2014 then and there wilfully, unlawfully,
14 and feloniously commit fornication or adultery with A.S., the daughter; the Defendant and
15 A.S. being within the degree of consanguinity within which marriages are declared by law to
16 be incestuous and void; the Defendant committing the crime by engaging in a sexual act with
17 the said A.S.

18 COUNT 17 - INCEST

19 did on or between May 22, 2001 and May 21, 2014 then and there wilfully, unlawfully,
20 and feloniously commit fornication or adultery with A.S., the daughter; the Defendant and
21 A.S. being within the degree of consanguinity within which marriages are declared by law to
22 be incestuous and void; the Defendant committing the crime by engaging in a sexual act with
23 the said A.S.

24 COUNT 18 - INCEST

25 did on or between May 22, 2001 and May 21, 2014 then and there wilfully, unlawfully,
26 and feloniously commit fornication or adultery with A.S., the daughter; the Defendant and
27 A.S. being within the degree of consanguinity within which marriages are declared by law to
28 be incestuous and void; the Defendant committing the crime by engaging in a sexual act with

1 the said A.S.

2 All of which is contrary to the form, force and effect of Statutes in such cases made and
3 provided and against the peace and dignity of the State of Nevada. Said Complainant makes
4 this declaration subject to the penalty of perjury.

5
6 
7 09/18/14
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

26 14F14785X/rmj
27 LVMPD EV# 1409151583
28 (TK3)



ORIGINAL

FILED IN OPEN COURT

10/22/14

JUSTICE COURT, LAS VEGAS TOWNSHIP CLARK
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

CHRISTOPHER SENA,
#0779849,

Defendant.

CASE NO: 14F14785X

DEPT NO: 3

AMENDED

CRIMINAL COMPLAINT

The Defendant above named having committed the crimes of **CHILD ABUSE, NEGLECT, OR ENDANGERMENT (Category B Felony - NRS 200.508(1) - NOC 55226); SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE (Category A Felony - NRS 200.364, 200.366 - NOC 50105); LEWDNESS WITH A CHILD UNDER THE AGE OF 14 (Category A Felony - NRS 201.230 - NOC 50975); SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE (Category A Felony - NRS 200.364, 200.366 - NOC 50106), INCEST (Category A Felony - NRS 201.180 - NOC 50957) and PREVENTING OR DISSUADING WITNESS OR VICTIM FROM REPORTING CRIME OR COMMENCING PROSECUTION (Category D Felony - NRS 199.305 - NOC 52996)** in the manner following, to-wit: That the said Defendant, on or between May 22, 2001 and May 31, 2014, at and within the County of Clark, State of Nevada,

COUNT 1 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT

did willfully, unlawfully, and feloniously cause a child under the age of 18 years, to-wit: A.S., being approximately 11 year(s) of age, to suffer unjustifiable physical pain or mental suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature and/or cause the said A.S. to be placed in a situation where the said A.S. might have suffered unjustifiable physical pain or mental suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature by forcing the said A.S. to participate in sexual acts with the Defendant and with others.

1 COUNT 2 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT

2 did willfully, unlawfully, and feloniously cause a child under the age of 18 years, to-
3 wit: A.S., being approximately 11 year(s) of age, to suffer unjustifiable physical pain or mental
4 suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature
5 and/or cause the said A.S. to be placed in a situation where the said A.S. might have suffered
6 unjustifiable physical pain or mental suffering as a result of abuse or neglect, to wit: physical
7 injury of a non accidental nature by forcing the said A.S. to participate in sexual acts with the
8 Defendant and with others.

9 COUNT 3 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT

10 did willfully, unlawfully, and feloniously cause a child under the age of 18 years, to-
11 wit: A.S., being approximately 11 year(s) of age, to suffer unjustifiable physical pain or mental
12 suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature
13 and/or cause the said A.S. to be placed in a situation where the said A.S. might have suffered
14 unjustifiable physical pain or mental suffering as a result of abuse or neglect, to wit: physical
15 injury of a non accidental nature by forcing the said A.S. to participate in sexual acts with the
16 Defendant and with others.

17 COUNT 4 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT

18 did willfully, unlawfully, and feloniously cause a child under the age of 18 years, to-
19 wit: A.S., being approximately 11 year(s) of age, to suffer unjustifiable physical pain or mental
20 suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature
21 and/or cause the said A.S. to be placed in a situation where the said A.S. might have suffered
22 unjustifiable physical pain or mental suffering as a result of abuse or neglect, to wit: physical
23 injury of a non accidental nature by forcing the said A.S. to participate in sexual acts with the
24 Defendant and with others.

25 COUNT 5 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT

26 did willfully, unlawfully, and feloniously cause a child under the age of 18 years, to-
27 wit: A.S., being approximately 11 year(s) of age, to suffer unjustifiable physical pain or mental
28 suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature

1 and/or cause the said A.S. to be placed in a situation where the said A.S. might have suffered
2 unjustifiable physical pain or mental suffering as a result of abuse or neglect, to wit: physical
3 injury of a non accidental nature by forcing the said A.S. to participate in sexual acts with the
4 Defendant and with others.

5 COUNT 6 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

6 did then and there willfully, unlawfully, and feloniously sexually assault and subject
7 A.S., a child under fourteen years of age, to sexual penetration, to-wit: anal intercourse: by
8 placing his penis into the anal opening of the said A.S., against her will, or under conditions
9 in which Defendant knew, or should have known, that A.S. was mentally or physically
10 incapable of resisting or understanding the nature of Defendant's conduct.

11 COUNT 7 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

12 did then and there willfully, unlawfully, and feloniously sexually assault and subject
13 A.S., a child under fourteen years of age, to sexual penetration, to-wit: anal intercourse: by
14 placing his penis into the anal opening of the said A.S., against her will, or under conditions
15 in which Defendant knew, or should have known, that A.S. was mentally or physically
16 incapable of resisting or understanding the nature of Defendant's conduct.

17 COUNT 8 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

18 did then and there willfully, unlawfully, and feloniously sexually assault and subject
19 A.S., a child under fourteen years of age, to sexual penetration, to-wit: anal intercourse: by
20 placing his penis into the anal opening of the said A.S., against her will, or under conditions
21 in which Defendant knew, or should have known, that A.S. was mentally or physically
22 incapable of resisting or understanding the nature of Defendant's conduct.

23 COUNT 9 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

24 did then and there willfully, lewdly, unlawfully, and feloniously commit a lewd or
25 lascivious act upon or with the body, or any part or member thereof, a child, to-wit: A.S., said
26 child being under the age of fourteen years, by caressing and/or fondling the said A.S.'S
27 breasts, with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual
28 desires of said Defendant, or said child.

1 COUNT 10 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

2 did then and there willfully, lewdly, unlawfully, and feloniously commit a lewd or
3 lascivious act upon or with the body, or any part or member thereof, a child, to-wit: A.S., said
4 child being under the age of fourteen years, by caressing and/or fondling the said A.S.'S
5 breasts, with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual
6 desires of said Defendant, or said child.

7 COUNT 11 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

8 did then and there willfully, lewdly, unlawfully, and feloniously commit a lewd or
9 lascivious act upon or with the body, or any part or member thereof, a child, to-wit: A.S., said
10 child being under the age of fourteen years, by caressing and/or fondling the said A.S.'S
11 breasts, with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual
12 desires of said Defendant, or said child.

13 COUNT 12 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

14 did then and there willfully, unlawfully, and feloniously sexually assault and subject
15 A.S., a child under sixteen years of age, to sexual penetration, to-wit: placing his penis into
16 the genital opening of the said A.S., against her will, or under conditions in which Defendant
17 knew, or should have known, that the said victim was mentally or physically incapable of
18 resisting or understanding the nature of Defendant's conduct.

19 COUNT 13 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

20 did then and there willfully, unlawfully, and feloniously sexually assault and subject
21 A.S., a child under sixteen years of age, to sexual penetration, to-wit: placing his penis into
22 the genital opening of the said A.S., against her will, or under conditions in which Defendant
23 knew, or should have known, that the said victim was mentally or physically incapable of
24 resisting or understanding the nature of Defendant's conduct.

25 COUNT 14 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

26 did then and there willfully, unlawfully, and feloniously sexually assault and subject
27 A.S., a child under sixteen years of age, to sexual penetration, to-wit: placing his penis into
28 the genital opening of the said A.S., against her will, or under conditions in which Defendant

1 knew, or should have known, that the said victim was mentally or physically incapable of
2 resisting or understanding the nature of Defendant's conduct.

3 COUNT 15 - INCEST

4 did then and there willfully, unlawfully, and feloniously commit fornication or adultery
5 with A.S., the offspring; the Defendant and A.S. being within the degree of consanguinity
6 within which marriages are declared by law to be incestuous and void; the Defendant
7 committing the crime by engaging in a sexual act with the said A.S.

8 COUNT 16 - INCEST

9 did then and there willfully, unlawfully, and feloniously commit fornication or adultery
10 with A.S., the offspring; the Defendant and A.S. being within the degree of consanguinity
11 within which marriages are declared by law to be incestuous and void; the Defendant
12 committing the crime by engaging in a sexual act with the said A.S.

13 COUNT 17 - INCEST

14 did then and there willfully, unlawfully, and feloniously commit fornication or adultery
15 with A.S., the offspring; the Defendant and A.S. being within the degree of consanguinity
16 within which marriages are declared by law to be incestuous and void; the Defendant
17 committing the crime by engaging in a sexual act with the said A.S.

18 COUNT 18 - INCEST

19 did then and there willfully, unlawfully, and feloniously commit fornication or adultery
20 with A.S., the offspring; the Defendant and A.S. being within the degree of consanguinity
21 within which marriages are declared by law to be incestuous and void; the Defendant
22 committing the crime by engaging in a sexual act with the said A.S.

23 COUNT 19 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
24 AGE

25 did then and there willfully, unlawfully, and feloniously sexually assault and subject
26 B.S., a child under fourteen years of age, to sexual penetration, to-wit: sexual intercourse: by
27 said Defendant causing and/or directing and/or encouraging the said B.S. to insert his penis
28 into the genital opening of DEBORAH SENA, against the will of the said B.S., or under

1 conditions in which Defendant knew, or should have known, that said B.S. was mentally or
2 physically incapable of resisting or understanding the nature of Defendant's conduct.

3 COUNT 20 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
4 AGE

5 did then and there willfully, unlawfully, and feloniously sexually assault and subject
6 B.S., a child under fourteen years of age, to sexual penetration, to-wit: cunnilingus: by said
7 Defendant causing and/or directing and/or encouraging the said B.S. to place his mouth and/or
8 tongue on and/or into the genital opening of DEBORAH SENA, against the will of the said
9 B.S., or under conditions in which Defendant knew, or should have known, that said B.S. was
10 mentally or physically incapable of resisting or understanding the nature of Defendant's
11 conduct.

12 COUNT 21 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
13 AGE

14 did then and there willfully, unlawfully, and feloniously sexually assault and subject
15 B.S., a child under fourteen years of age, to sexual penetration, to-wit: sexual intercourse: by
16 said Defendant causing and/or directing and/or encouraging the said B.S. to insert his penis
17 into the genital opening of TERRIE SENA, against the will of the said B.S., or under
18 conditions in which Defendant knew, or should have known, that said B.S. was mentally or
19 physically incapable of resisting or understanding the nature of Defendant's conduct.

20 COUNT 22 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

21 did then and there willfully, lewdly, unlawfully, and feloniously commit a lewd or
22 lascivious act upon or with the body, or any part or member thereof, a child, to-wit: B.S., said
23 child being under the age of fourteen years, by said Defendant causing and/or directing and/or
24 encouraging the said B.S. to use the hand(s) and/or finger(s) of the said B.S. to touch and/or
25 rub and/or fondle the breast(s) of TERRIE SENA, with the intent of arousing, appealing to, or
26 gratifying the lust, passions, or sexual desires of said Defendant, or said child.

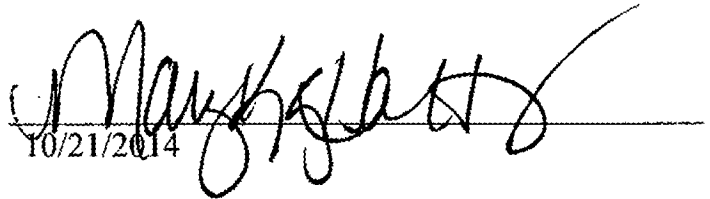
27 //

28 //

1 COUNT 23 - PREVENTING OR DISSUADING WITNESS OR VICTIM FROM
2 REPORTING CRIME OR COMMENCING PROSECUTION

3 did then and there wilfully, unlawfully, and feloniously, by intimidation or threats,
4 prevent or dissuade, or hinder or delay B.S., from reporting a crime to anyone by said
5 Defendant telling the said B.S. that the said Defendant would break the legs of the said B.S. if
6 the said B.S. told anyone of the sexual acts the said B.S. was forced to commit or have
7 committed upon the said B.S.

8 All of which is contrary to the form, force and effect of Statutes in such cases made and
9 provided and against the peace and dignity of the State of Nevada. Said Complainant makes
10 this declaration subject to the penalty of perjury.

11
12 
13 10/21/2014

14
15
16
17
18
19
20
21
22
23
24
25
26
27 DA#14F14785X/hjc/SUV
28 LVMPD EV#1409151583
(TK3)

ORIGINAL

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

FILED IN OPEN COURT

12-18-14
PS
CLARK

THE STATE OF NEVADA,

Plaintiff,

-VS-

CHRISTOPHER SENA,
#0779849,

Defendant.

CASE NO: 14F14785X

DEPT NO: 3

SECOND AMENDED

CRIMINAL COMPLAINT

The Defendant above named having committed the crimes of **CHILD ABUSE, NEGLECT, OR ENDANGERMENT, SEXUAL ABUSE OR EXPLOITATION (Category A Felony - NRS 200.508(1) - NOC 55220), SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE (Category A Felony - NRS 200.364, 200.366 - NOC 50105), LEWDNESS WITH A CHILD UNDER THE AGE OF 14 (Category A Felony - NRS 201.230 - NOC 50975), SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE (Category A Felony - NRS 200.364, 200.366 - NOC 50106), INCEST (Category A Felony - NRS 201.180 - NOC 50957), PREVENTING OR DISSUADING WITNESS OR VICTIM FROM REPORTING CRIME OR COMMENCING PROSECUTION (Category D Felony - NRS 199.305 - NOC 52996), POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL CONDUCT OF A CHILD (Category B Felony - NRS 200.700, 200.730 - NOC 50374) and USE MINOR UNDER THE AGE OF 14 AS SUBJECT OF SEXUAL PORTRAYAL IN A PERFORMANCE (Category A Felony - NRS 200.700, 200.710.2, 200.750 - NOC 50370)** in the manner following, to-wit: That the said Defendant, on or between January 1, 2001 and January 31, 2014, at and within the County of Clark, State of Nevada,

//

//

//

//

14F14785X
ACRM
Amended Criminal Complaint
4559813



FILED IN OPEN COURT
12/18/14
PS
CLARK

1 COUNT 1 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT, SEXUAL ABUSE
2 OR EXPLOITATION

3 did, willfully, unlawfully, and feloniously cause a child under the age of 18 years, to-
4 wit: A.S., being approximately eleven (11) years of age, to suffer unjustifiable physical pain
5 or mental suffering as a result of abuse or neglect, to wit: physical injury of a non accidental
6 nature and/or sexual abuse and/or sexual exploitation and/or negligent treatment or
7 maltreatment of a child under the age of 18, and/or cause the said A.S. to be placed in a
8 situation where the said A.S. might have suffered unjustifiable physical pain or mental
9 suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature by
10 forcing the said A.S. to participate in sexual acts with the Defendant and with others.

11 COUNT 2 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT, SEXUAL ABUSE
12 OR EXPLOITATION

13 did, willfully, unlawfully, and feloniously cause a child under the age of 18 years, to-
14 wit: A.S., being approximately eleven (11) years of age, to suffer unjustifiable physical pain
15 or mental suffering as a result of abuse or neglect, to wit: physical injury of a non accidental
16 nature and/or sexual abuse and/or sexual exploitation and/or negligent treatment or
17 maltreatment of a child under the age of 18, and/or cause the said A.S. to be placed in a
18 situation where the said A.S. might have suffered unjustifiable physical pain or mental
19 suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature by
20 forcing the said A.S. to participate in sexual acts with the Defendant and with others.

21 COUNT 3 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT, SEXUAL ABUSE
22 OR EXPLOITATION

23 did, willfully, unlawfully, and feloniously cause a child under the age of 18 years, to-
24 wit: A.S., being approximately eleven (11) years of age, to suffer unjustifiable physical pain
25 or mental suffering as a result of abuse or neglect, to wit: physical injury of a non accidental
26 nature and/or sexual abuse and/or sexual exploitation and/or negligent treatment or
27 maltreatment of a child under the age of 18, and/or cause the said A.S. to be placed in a
28 situation where the said A.S. might have suffered unjustifiable physical pain or mental

1 suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature by
2 forcing the said A.S. to participate in sexual acts with the Defendant and with others.

3 COUNT 4 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT, SEXUAL ABUSE
4 OR EXPLOITATION

5 did, willfully, unlawfully, and feloniously cause a child under the age of 18 years, to-
6 wit: A.S., being approximately eleven (11) years of age, to suffer unjustifiable physical pain
7 or mental suffering as a result of abuse or neglect, to wit: physical injury of a non accidental
8 nature and/or sexual abuse and/or sexual exploitation and/or negligent treatment or
9 maltreatment of a child under the age of 18, and/or cause the said A.S. to be placed in a
10 situation where the said A.S. might have suffered unjustifiable physical pain or mental
11 suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature by
12 forcing the said A.S. to participate in sexual acts with the Defendant and with others.

13 COUNT 5 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT, SEXUAL ABUSE
14 OR EXPLOITATION

15 did, willfully, unlawfully, and feloniously cause a child under the age of 18 years, to-
16 wit: A.S., being approximately eleven (11) years of age, to suffer unjustifiable physical pain
17 or mental suffering as a result of abuse or neglect, to wit: physical injury of a non accidental
18 nature and/or sexual abuse and/or sexual exploitation and/or negligent treatment or
19 maltreatment of a child under the age of 18, and/or cause the said A.S. to be placed in a
20 situation where the said A.S. might have suffered unjustifiable physical pain or mental
21 suffering as a result of abuse or neglect, to wit: physical injury of a non accidental nature by
22 forcing the said A.S. to participate in sexual acts with the Defendant and with others.

23 COUNT 6 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
24 AGE

25 did, then and there, willfully, unlawfully, and feloniously sexually assault and subject
26 A.S., a child under fourteen years of age, to sexual penetration, to-wit: anal intercourse, by
27 said Defendant inserting his penis into the anal opening of the said A.S., against the will of the
28 said A.S., or under conditions in which Defendant knew, or should have known, that A.S. was

1 mentally or physically incapable of resisting or understanding the nature of Defendant's
2 conduct.

3 COUNT 7 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
4 AGE

5 did, then and there, willfully, unlawfully, and feloniously sexually assault and subject
6 A.S., a child under fourteen years of age, to sexual penetration, to-wit: anal intercourse, by
7 said Defendant inserting his penis into the anal opening of the said A.S., against the will of the
8 said A.S., or under conditions in which Defendant knew, or should have known, that A.S. was
9 mentally or physically incapable of resisting or understanding the nature of Defendant's
10 conduct.

11 COUNT 8 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
12 AGE

13 did, then and there, willfully, unlawfully, and feloniously sexually assault and subject
14 A.S., a child under fourteen years of age, to sexual penetration, to-wit: anal intercourse, by
15 said Defendant inserting his penis into the anal opening of the said A.S., against the will of the
16 said A.S., or under conditions in which Defendant knew, or should have known, that A.S. was
17 mentally or physically incapable of resisting or understanding the nature of Defendant's
18 conduct.

19 COUNT 9 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

20 did, then and there, willfully, lewdly, unlawfully, and feloniously commit a lewd or
21 lascivious act upon or with the body, or any part or member thereof, a child, to-wit: A.S., said
22 child being under the age of fourteen years, by said Defendant using his hand(s) and/or
23 finger(s) to touch and/or rub and/or fondle the breast(s) of the said A.S., with the intent of
24 arousing, appealing to, or gratifying the lust, passions, or sexual desires of said Defendant, or
25 said child.

26 //

27 //

28 //

1 COUNT 10 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

2 did, then and there, willfully, lewdly, unlawfully, and feloniously commit a lewd or
3 lascivious act upon or with the body, or any part or member thereof, a child, to-wit: A.S., said
4 child being under the age of fourteen years, by said Defendant using his hand(s) and/or
5 finger(s) to touch and/or rub and/or fondle the breast(s) of the said A.S., with the intent of
6 arousing, appealing to, or gratifying the lust, passions, or sexual desires of said Defendant, or
7 said child.

8 COUNT 11 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

9 did, then and there, willfully, lewdly, unlawfully, and feloniously commit a lewd or
10 lascivious act upon or with the body, or any part or member thereof, a child, to-wit: A.S., said
11 child being under the age of fourteen years, by said Defendant using his hand(s) and/or
12 finger(s) to touch and/or rub and/or fondle the breast(s) of the said A.S., with the intent of
13 arousing, appealing to, or gratifying the lust, passions, or sexual desires of said Defendant, or
14 said child.

15 COUNT 12 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

16 did, then and there, willfully, unlawfully, and feloniously sexually assault and subject
17 A.S., a child under sixteen years of age, to sexual penetration, to-wit: sexual intercourse, by
18 said Defendant inserting his penis into the genital opening of the said A.S., against the will of
19 the said A.S., or under conditions in which Defendant knew, or should have known, that the
20 said victim was mentally or physically incapable of resisting or understanding the nature of
21 Defendant's conduct.

22 COUNT 13 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

23 did, then and there, willfully, unlawfully, and feloniously sexually assault and subject
24 A.S., a child under sixteen years of age, to sexual penetration, to-wit: sexual intercourse, by
25 said Defendant inserting his penis into the genital opening of the said A.S., against the will of
26 the said A.S., or under conditions in which Defendant knew, or should have known, that the
27 said victim was mentally or physically incapable of resisting or understanding the nature of
28 Defendant's conduct.

1 COUNT 14 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

2 did, then and there, willfully, unlawfully, and feloniously sexually assault and subject
3 A.S., a child under sixteen years of age, to sexual penetration, to-wit: sexual intercourse, by
4 said Defendant inserting his penis into the genital opening of the said A.S., against the will of
5 the said A.S., or under conditions in which Defendant knew, or should have known, that the
6 said victim was mentally or physically incapable of resisting or understanding the nature of
7 Defendant's conduct.

8 COUNT 16 - INCEST

9 did, then and there willfully, unlawfully, and feloniously commit fornication or
10 adultery with A.S., the offspring, the Defendant and A.S. being within the degree of
11 consanguinity within which marriages are declared by law to be incestuous and void; the
12 Defendant committing the crime by engaging in a sexual intercourse with the said A.S.

13 COUNT 17 - INCEST

14 did, then and there, willfully, unlawfully, and feloniously commit fornication or
15 adultery with A.S., the offspring, the Defendant and A.S. being within the degree of
16 consanguinity within which marriages are declared by law to be incestuous and void; the
17 Defendant committing the crime by engaging in a sexual intercourse with the said A.S.

18 COUNT 18 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
19 AGE

20 did, then and there, willfully, unlawfully, and feloniously sexually assault and subject
21 B.S., a child under fourteen years of age, to sexual penetration, to-wit: sexual intercourse, by
22 said Defendant causing and/or directing and/or encouraging the said B.S. to insert his penis
23 into the genital opening of DEBORAH SENA, against the will of the said B.S., or under
24 conditions in which Defendant knew, or should have known, that said B.S. was mentally or
25 physically incapable of resisting or understanding the nature of Defendant's conduct.

26 //

27 //

28 //

1 COUNT 19 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
2 AGE

3 did, then and there, willfully, unlawfully, and feloniously sexually assault and subject
4 B.S., a child under fourteen years of age, to sexual penetration, to-wit: cunnilingus, by said
5 Defendant causing and/or directing and/or encouraging the said B.S. to place his mouth and/or
6 tongue on and/or into the genital opening of DEBORAH SENA, against the will of the said
7 B.S., or under conditions in which Defendant knew, or should have known, that said B.S. was
8 mentally or physically incapable of resisting or understanding the nature of Defendant's
9 conduct.

10 COUNT 20 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
11 AGE

12 did, then and there, willfully, unlawfully, and feloniously sexually assault and subject
13 B.S., a child under fourteen years of age, to sexual penetration, to-wit: sexual intercourse: by
14 said Defendant causing and/or directing and/or encouraging the said B.S. to insert his penis
15 into the genital opening of TERRIE SENA, against the will of the said B.S., or under
16 conditions in which Defendant knew, or should have known, that said B.S. was mentally or
17 physically incapable of resisting or understanding the nature of Defendant's conduct.

18 COUNT 21 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

19 did, then and there, willfully, lewdly, unlawfully, and feloniously commit a lewd or
20 lascivious act upon or with the body, or any part or member thereof, a child, to-wit: B.S., said
21 child being under the age of fourteen years, by said Defendant causing and/or directing and/or
22 encouraging the said B.S. to use the hand(s) and/or finger(s) of the said B.S. to touch and/or
23 rub and/or fondle the breast(s) of TERRIE SENA, with the intent of arousing, appealing to, or
24 gratifying the lust, passions, or sexual desires of said Defendant, or said child.

25 //

26 //

27 //

28 //

1 COUNT 22 - PREVENTING OR DISSUADING WITNESS OR VICTIM FROM
2 REPORTING CRIME OR COMMENCING PROSECUTION

3 did, then and there, willfully, unlawfully, and feloniously, by intimidation or threats,
4 prevent or dissuade, or hinder or delay B.S., from reporting a crime to anyone by said
5 Defendant telling the said B.S. that the said Defendant would break the legs of the said B.S. if
6 the said B.S. told anyone of the sexual acts the said B.S. was forced to commit or have
7 committed upon the said B.S.

8 COUNT 23 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
9 CONDUCT OF A CHILD

10 did, on or about the 18th day of September, 2014, then and there, feloniously,
11 knowingly and willfully have in his possession a film, photograph, or other visual presentation
12 depicting a child under the age of 16 years of age as the subject of a sexual portrayal or
13 engaging in, simulating, or assisting others to engage in or simulate sexual conduct, to-wit: a
14 photograph of M.C., approximately fifteen (15) years of age, standing nude in a shower.

15 COUNT 24 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
16 CONDUCT OF A CHILD

17 did, on or about the 18th day of September, 2014, then and there, feloniously,
18 knowingly and willfully have in his possession a film, photograph, or other visual presentation
19 depicting a child under the age of 16 years of age as the subject of a sexual portrayal or
20 engaging in, simulating, or assisting others to engage in or simulate sexual conduct, to-wit: a
21 photograph of M.C., approximately fifteen (15) years of age, lying nude on a bed with a sex
22 toy vibrator between her legs and against her genital area.

23 COUNT 25 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
24 CONDUCT OF A CHILD

25 did, on or about the 18th day of September, 2014, then and there, feloniously,
26 knowingly and willfully have in his possession a film, photograph, or other visual presentation
27 depicting a child under the age of 16 years of age as the subject of a sexual portrayal or
28 engaging in, simulating, or assisting others to engage in or simulate sexual conduct, to-wit: a

1 photograph of M.C., approximately fifteen (15) years of age, lying nude on a bed with co-
2 Defendant TERRIE SENA, who is also nude and pregnant.

3 COUNT 26 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
4 CONDUCT OF A CHILD

5 did, on or about the 18th day of September, 2014, then and there, feloniously,
6 knowingly and willfully have in his possession a film, photograph, or other visual presentation
7 depicting a child under the age of 16 years of age as the subject of a sexual portrayal or
8 engaging in, simulating, or assisting others to engage in or simulate sexual conduct, to-wit: a
9 photograph of M.C., approximately fifteen (15) years of age, having sexual intercourse with
10 said Defendant as M.C. is lying on her back with said Defendant on top of the said M.C.
11 positioned between the legs of the said M.C.

12 COUNT 27 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
13 CONDUCT OF A CHILD

14 did, on or about the 18th day of September, 2014, then and there, feloniously,
15 knowingly and willfully have in his possession a film, photograph, or other visual presentation
16 depicting a child under the age of 16 years of age as the subject of a sexual portrayal or
17 engaging in, simulating, or assisting others to engage in or simulate sexual conduct, to-wit: a
18 short video of M.C., approximately fifteen (15) years of age, performing fellatio on said
19 Defendant.

20 COUNT 28 - USE MINOR UNDER THE AGE OF 14 AS SUBJECT OF SEXUAL
21 PORTRAYAL IN A PERFORMANCE

22 did, on or about the 18th day of September, 2014, willfully, unlawfully, feloniously
23 and knowingly use, encourage, entice, coerce, or permit E.C., a minor under the age of 14, to
24 be the subject of a sexual portrayal in a performance, by said Defendant video recording the
25 said E.C. taking a shower.

26 //

27 //

28 //

1 COUNT 29 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
2 CONDUCT OF A CHILD

3 did, on or about the 18th day of September, 2014, then and there, feloniously,
4 knowingly and willfully have in his possession a film, photograph, or other visual presentation
5 depicting a child under the age of 16 years of age as the subject of a sexual portrayal or
6 engaging in, simulating, or assisting others to engage in or simulate sexual conduct, to-wit: a
7 video of E.C., approximately between the ages of eight (8) and ten (10) years of age, taking a
8 shower.

9 COUNT 30 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

10 did, on or about the 18th day of September, 2014, then and there, willfully, lewdly,
11 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
12 or member thereof, a child, to-wit: E.C., said child being under the age of fourteen years, by
13 said Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the genital
14 area of the said E.C., with the intent of arousing, appealing to, or gratifying the lust, passions,
15 or sexual desires of said Defendant, or said child.

16 COUNT 31 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

17 did, on or about the 18th day of September, 2014, then and there, willfully, lewdly,
18 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
19 or member thereof, a child, to-wit: E.C., said child being under the age of fourteen years, by
20 said Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the genital
21 area of the said E.C., with the intent of arousing, appealing to, or gratifying the lust, passions,
22 or sexual desires of said Defendant, or said child.

23 COUNT 32 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

24 did, on or about the 18th day of September, 2014, then and there, willfully, lewdly,
25 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
26 or member thereof, a child, to-wit: E.C., said child being under the age of fourteen years, by
27 said Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the
28 breast(s) of the said E.C., with the intent of arousing, appealing to, or gratifying the lust,

1 passions, or sexual desires of said Defendant, or said child.

2 COUNT 33 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

3 did, on or about the 18th day of September, 2014, then and there, willfully, lewdly,
4 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
5 or member thereof, a child, to-wit: E.C., said child being under the age of fourteen years, by
6 said Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the
7 breast(s) of the said E.C., with the intent of arousing, appealing to, or gratifying the lust,
8 passions, or sexual desires of said Defendant, or said child.

9 COUNT 34 - USE MINOR UNDER THE AGE OF 14 AS SUBJECT OF SEXUAL
10 PORTRAYAL IN A PERFORMANCE

11 did, on or about the 18th day of September, 2014, willfully, unlawfully, feloniously
12 and knowingly use, encourage, entice, coerce, or permit T.G., a minor under the age of 14, to
13 be the subject of a sexual portrayal in a performance, by said Defendant video recording the
14 said T.G. taking a shower.

15 COUNT 35 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
16 CONDUCT OF A CHILD

17 did, on or about the 18th day of September, 2014, then and there, feloniously,
18 knowingly and willfully have in his possession a film, photograph, or other visual presentation
19 depicting a child under the age of 16 years of age as the subject of a sexual portrayal or
20 engaging in, simulating, or assisting others to engage in or simulate sexual conduct, to-wit: a
21 video of T.G., approximately between the ages of eleven (11) and fourteen (14) years of age,
22 taking a shower.
23 conduct.

24 COUNT 36 - USE MINOR UNDER THE AGE OF 14 AS SUBJECT OF SEXUAL
25 PORTRAYAL IN A PERFORMANCE

26 did, willfully, unlawfully, feloniously and knowingly use, encourage, entice, coerce,
27 or permit R.S., a minor under the age of 14, to be the subject of a sexual portrayal in a
28 performance, by said Defendant video recording the said R.S. receiving fellatio from co-

1 Defendant TERRIE SENA.

2 COUNT 37 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
3 CONDUCT OF A CHILD

4 did, then and there, feloniously, knowingly and willfully have in his possession a film,
5 photograph, or other visual presentation depicting a child under the age of 16 years of age as
6 the subject of a sexual portrayal or engaging in, simulating, or assisting others to engage in or
7 simulate sexual conduct, to-wit: a video recording of Defendant setting up a video camera to
8 record a portion of the office. R.S., who appears to be between the ages of 12 and 14 years of
9 age, walks into the room with co-Defendant TERRIE SENA. R.S. is wearing a red polo shirt.
10 TERRIE SENA removes R.C.'s clothes and removes hers as well. TERRIE SENA then
11 proceeds to perform fellatio on R.C. while Defendant is videotaping and watching TERRIE
12 SENA perform fellatio on R.C. Defendant then removes his pants and stands next to TERRIE
13 SENA and R.C. At that time, TERRIE SENA begins to perform fellatio on both Defendant
14 and R.C.

15 COUNT 38 - USE MINOR UNDER THE AGE OF 14 AS SUBJECT OF SEXUAL
16 PORTRAYAL IN A PERFORMANCE

17 did, willfully, unlawfully, feloniously and knowingly use, encourage, entice, coerce,
18 or permit R.S., a minor under the age of 14, to be the subject of a sexual portrayal in a
19 performance, by said Defendant video recording the said R.S. receiving fellatio from co-
20 Defendant TERRIE SENA and engaging in sexual intercourse with co-Defendant TERRIE
21 SENA.

22 COUNT 39 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
23 CONDUCT OF A CHILD

24 did, then and there, feloniously, knowingly and willfully have in his possession a film,
25 photograph, or other visual presentation depicting a child under the age of 16 years of age as
26 the subject of a sexual portrayal or engaging in, simulating, or assisting others to engage in or
27 simulate sexual conduct, to-wit: a video recording of R.S. laying on a bed as TERRIE SENA
28 performs oral sex on him. After the oral sex, TERRIE SENA transitions to lying on her back

1 and R.S. is directed by Defendant and TERRIE SENA to have sexual intercourse with TERRIE
2 SENA. Later in the video, R.S. is lying on his back and TERRIE SENA is on her arms and
3 legs performing oral sex on him, while this is occurring Defendant is behind TERRIE SENA
4 having sexual intercourse with TERRIE SENA.

5 COUNT 40 - PROMOTION OF SEXUAL PERFORMANCE OF A MINOR UNDER
6 FOURTEEN YEARS OF AGE

7 Defendant and TERRIE SENA, did, then and there, willfully, unlawfully, feloniously
8 and knowingly promote a performance, to-wit: a video media of a minor, to-wit: R.S., in
9 which R.S. engages in or simulates, or assists others to engage in or simulate sexual conduct,
10 and/or R.S. is the subject of a sexual portrayal, to-wit: fellatio and/or sexual intercourse; the
11 Defendant being criminally liable under one or more of the following principles of criminal
12 liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
13 commission of this crime, with the intent that this crime be committed, by providing counsel
14 and/or encouragement and by entering into a course of conduct whereby co-conspirator
15 Defendant videotaped TERRIE SENA performing fellatio on the said R.S. and/or (3) pursuant
16 to a conspiracy to commit this crime.

17 COUNT 41 - PROMOTION OF SEXUAL PERFORMANCE OF A MINOR UNDER
18 FOURTEEN YEARS OF AGE

19 Defendant and TERRIE SENA, did, then and there, willfully, unlawfully, feloniously
20 and knowingly promote a performance, to-wit: a video media of a minor, to-wit: R.S., in
21 which R.S. engages in or simulates, or assists others to engage in or simulate sexual conduct,
22 and/or R.S. is the subject of a sexual portrayal, to-wit: fellatio and/or sexual intercourse; the
23 Defendant being criminally liable under one or more of the following principles of criminal
24 liability, to-wit: (1) by directly committing this crime; and/or (2) by aiding or abetting in the
25 commission of this crime, with the intent that this crime be committed, by providing counsel
26 and/or encouragement and by entering into a course of conduct whereby co-conspirator
27 Defendant videotaped the TERRIE SENA performing fellatio on the said R.S. and/or (3)
28 pursuant to a conspiracy to commit this crime.

1 COUNT 42 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
2 AGE

3 did, on or between the 14th day of June, 2009 and the 13th day of June, 2012, then and
4 there, willfully, unlawfully, and feloniously sexually assault and subject R.S., a child under
5 fourteen years of age, to sexual penetration, to-wit: anal intercourse, by said Defendant
6 inserting his penis into the anal opening of the said R.S., against the will of the said R.S., or
7 under conditions in which Defendant knew, or should have known, that R.S. was mentally or
8 physically incapable of resisting or understanding the nature of Defendant's conduct.

9 COUNT 43 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
10 AGE

11 did, on or between the 14th day of June, 2009 and the 13th day of June, 2012, then and
12 there, willfully, unlawfully, and feloniously sexually assault and subject R.S., a child under
13 fourteen years of age, to sexual penetration, to-wit: anal intercourse, by said Defendant
14 inserting his penis into the anal opening of the said R.S., against the will of the said R.S., or
15 under conditions in which Defendant knew, or should have known, that R.S. was mentally or
16 physically incapable of resisting or understanding the nature of Defendant's conduct.

17 COUNT 44 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
18 AGE

19 did, on or between the 14th day of June, 2009 and the 13th day of June, 2012, then and
20 there, willfully, unlawfully, and feloniously sexually assault and subject R.S., a child under
21 fourteen years of age, to sexual penetration, to-wit: anal intercourse, by said Defendant
22 inserting his penis into the anal opening of the said R.S., against the will of the said R.S., or
23 under conditions in which Defendant knew, or should have known, that R.S. was mentally or
24 physically incapable of resisting or understanding the nature of Defendant's conduct.

25 //

26 //

27 //

28 //

1 COUNT 45 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
2 AGE

3 did, on or between the 14th day of June, 2009 and the 13th day of June, 2012, then and
4 there, willfully, unlawfully, and feloniously sexually assault and subject R.S., a child under
5 fourteen years of age, to sexual penetration, to-wit: anal intercourse, by said Defendant
6 inserting his penis into the anal opening of the said R.S., against the will of the said R.S., or
7 under conditions in which Defendant knew, or should have known, that R.S. was mentally or
8 physically incapable of resisting or understanding the nature of Defendant's conduct.

9 COUNT 46 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
10 AGE

11 did, on or between the 14th day of June, 2009 and the 13th day of June, 2012, then and
12 there, willfully, unlawfully, and feloniously sexually assault and subject R.S., a child under
13 fourteen years of age, to sexual penetration, to-wit: anal intercourse, by said Defendant
14 inserting his penis into the anal opening of the said R.S., against the will of the said R.S., or
15 under conditions in which Defendant knew, or should have known, that R.S. was mentally or
16 physically incapable of resisting or understanding the nature of Defendant's conduct.

17 COUNT 47 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
18 AGE

19 did, on or between the 14th day of June, 2009 and the 13th day of June, 2012, then and
20 there, willfully, unlawfully, and feloniously sexually assault and subject R.S., a child under
21 fourteen years of age, to sexual penetration, to-wit: anal intercourse, by said Defendant
22 inserting his penis into the anal opening of the said R.S., against the will of the said R.S., or
23 under conditions in which Defendant knew, or should have known, that R.S. was mentally or
24 physically incapable of resisting or understanding the nature of Defendant's conduct.

25 //

26 //

27 //

28 //

1 COUNT 48 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF
2 AGE

3 did, on or between the 14th day of June, 2012 and the 13th day of June, 2014, then and
4 there, willfully, unlawfully, and feloniously sexually assault and subject R.S., a child under
5 sixteen years of age, to sexual penetration, to-wit: anal intercourse, by said Defendant
6 inserting his penis into the anal opening of the said R.S., against the will of the said R.S., or
7 under conditions in which Defendant knew, or should have known, that R.S. was mentally or
8 physically incapable of resisting or understanding the nature of Defendant's conduct.

9 COUNT 49 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF
10 AGE

11 did, on or between the 14th day of June, 2012 and the 13th day of June, 2014, then and
12 there, willfully, unlawfully, and feloniously sexually assault and subject R.S., a child under
13 sixteen years of age, to sexual penetration, to-wit: anal intercourse, by said Defendant
14 inserting his penis into the anal opening of the said R.S., against the will of the said R.S., or
15 under conditions in which Defendant knew, or should have known, that R.S. was mentally or
16 physically incapable of resisting or understanding the nature of Defendant's conduct.

17 COUNT 50 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF
18 AGE

19 did, on or between the 14th day of June, 2012 and the 13th day of June, 2014, then and
20 there, willfully, unlawfully, and feloniously sexually assault and subject R.S., a child under
21 sixteen years of age, to sexual penetration, to-wit: anal intercourse, by said Defendant
22 inserting his penis into the anal opening of the said R.S., against the will of the said R.S., or
23 under conditions in which Defendant knew, or should have known, that R.S. was mentally or
24 physically incapable of resisting or understanding the nature of Defendant's conduct.

25 //

26 //

27 //

28 //

1 COUNT 51 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF
2 AGE

3 did, on or between the 14th day of June, 2012 and the 13th day of June, 2014, then and
4 there, willfully, unlawfully, and feloniously sexually assault and subject R.S., a child under
5 sixteen years of age, to sexual penetration, to-wit: anal intercourse, by said Defendant
6 inserting his penis into the anal opening of the said R.S., against the will of the said R.S., or
7 under conditions in which Defendant knew, or should have known, that R.S. was mentally or
8 physically incapable of resisting or understanding the nature of Defendant's conduct.

9 COUNT 52 - COERCION (Sexually Motivated)

10 did, then and there, willfully, unlawfully and feloniously use physical force, or the
11 immediate threat of such force, against R.S., with intent to compel the said R.S. to do, or
12 abstain from doing, an act which the said R.S. had a right to do, or abstain from doing, by said
13 Defendant holding his hand over the mouth of the said R.S. and threatening to kill the said
14 R.S. or the family of the said R.S. if the said R.S. told anyone of the sexual abuse, one of the
15 purposes for which the Defendant committed the offense was Defendant's sexual gratification.

16 COUNT 53 - COERCION (Sexually Motivated)

17 did, then and there, willfully, unlawfully and feloniously use physical force, or the
18 immediate threat of such force, against R.S., with intent to compel the said R.S. to do, or
19 abstain from doing, an act which the said R.S. had a right to do, or abstain from doing, by said
20 Defendant holding his hand over the mouth of the said R.S. and threatening to kill the said
21 R.S. or the family of the said R.S. if the said R.S. told anyone of the sexual abuse, one of the
22 purposes for which the Defendant committed the offense was Defendant's sexual gratification.

23 COUNT 54 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
24 AGE

25 did, then and there, willfully, unlawfully, and feloniously sexually assault and subject
26 R.S., a child under fourteen years of age, to sexual penetration, to-wit: fellatio, by said
27 Defendant causing and/or directing and/or encouraging TERRIE SENA place the penis of the
28 said R.S. on and/or into the mouth of the said TERRIE SENA, against the will of the said R.S.,

1 or under conditions in which Defendant knew, or should have known, that R.S. was mentally
2 or physically incapable of resisting or understanding the nature of Defendant's conduct;
3 Defendant being liable under one or more of the following principles of criminal liability: (1)
4 by Defendant directly performing such acts; and/or (2) by Defendant acting with TERRIE
5 SENA and/or others unknown pursuant to a conspiracy with TERRIE SENA and/or others
6 unknown, in performing such acts; and/or (3) by Defendant and/or TERRIE SENA and/or
7 others unknown aiding and abetting each other by counseling, encouraging, inducing, or
8 otherwise procuring each other to commit such acts.

9 COUNT 55 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
10 AGE

11 did, then and there, willfully, unlawfully, and feloniously sexually assault and subject
12 R.S., a child under fourteen years of age, to sexual penetration, to-wit: fellatio, by said
13 Defendant causing and/or directing and/or encouraging TERRIE SENA place the penis of the
14 said R.S. on and/or into the mouth of the said TERRIE SENA, against the will of the said R.S.,
15 or under conditions in which Defendant knew, or should have known, that R.S. was mentally
16 or physically incapable of resisting or understanding the nature of Defendant's conduct;
17 Defendant being liable under one or more of the following principles of criminal liability: (1)
18 by Defendant directly performing such acts; and/or (2) by Defendant acting with TERRIE
19 SENA and/or others unknown pursuant to a conspiracy with TERRIE SENA and/or others
20 unknown, in performing such acts; and/or (3) by Defendant and/or TERRIE SENA and/or
21 others unknown aiding and abetting each other by counseling, encouraging, inducing, or
22 otherwise procuring each other to commit such acts.

23 COUNT 56 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
24 AGE

25 did, then and there, willfully, unlawfully, and feloniously sexually assault and subject
26 R.S., a child under fourteen years of age, to sexual penetration, to-wit: sexual intercourse, by
27 said Defendant causing and/or directing and/or encouraging TERRIE SENA place the penis
28 of the said R.S. into the genital opening of the said TERRIE SENA, against the will of the said

1 R.S., or under conditions in which Defendant knew, or should have known, that R.S. was
2 mentally or physically incapable of resisting or understanding the nature of Defendant's
3 conduct; Defendant being liable under one or more of the following principles of criminal
4 liability: (1) by Defendant directly performing such acts; and/or (2) by Defendant acting with
5 TERRIE SENA and/or others unknown pursuant to a conspiracy with TERRIE SENA and/or
6 others unknown, in performing such acts; and/or (3) by Defendant and/or TERRIE SENA
7 and/or others unknown aiding and abetting each other by counseling, encouraging, inducing,
8 or otherwise procuring each other to commit such acts.

9 COUNT 57 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
10 AGE

11 did, then and there, willfully, unlawfully, and feloniously sexually assault and subject
12 R.S., a child under fourteen years of age, to sexual penetration, to-wit: fellatio, by said
13 Defendant causing and/or directing and/or encouraging TERRIE SENA place the penis of the
14 said R.S. on and/or into the mouth of the said TERRIE SENA, against the will of the said R.S.,
15 or under conditions in which Defendant knew, or should have known, that R.S. was mentally
16 or physically incapable of resisting or understanding the nature of Defendant's conduct;
17 Defendant being liable under one or more of the following principles of criminal liability: (1)
18 by Defendant directly performing such acts; and/or (2) by Defendant acting with TERRIE
19 SENA and/or others unknown pursuant to a conspiracy with TERRIE SENA and/or others
20 unknown, in performing such acts; and/or (3) by Defendant and/or TERRIE SENA and/or
21 others unknown aiding and abetting each other by counseling, encouraging, inducing, or
22 otherwise procuring each other to commit such acts.

23 COUNT 58 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
24 AGE

25 did, then and there, willfully, unlawfully, and feloniously sexually assault and subject
26 R.S., a child under fourteen years of age, to sexual penetration, to-wit: fellatio, by said
27 Defendant causing and/or directing and/or encouraging TERRIE SENA place the penis of the
28 said R.S. on and/or into the mouth of the said TERRIE SENA, against the will of the said R.S.,

1 or under conditions in which Defendant knew, or should have known, that R.S. was mentally
2 or physically incapable of resisting or understanding the nature of Defendant's conduct;
3 Defendant being liable under one or more of the following principles of criminal liability: (1)
4 by Defendant directly performing such acts; and/or (2) by Defendant acting with TERRIE
5 SENA and/or others unknown pursuant to a conspiracy with TERRIE SENA and/or others
6 unknown, in performing such acts; and/or (3) by Defendant and/or TERRIE SENA and/or
7 others unknown aiding and abetting each other by counseling, encouraging, inducing, or
8 otherwise procuring each other to commit such acts.

9 All of which is contrary to the form, force and effect of Statutes in such cases made and
10 provided and against the peace and dignity of the State of Nevada. Said Complainant makes
11 this declaration subject to the penalty of perjury.

12
13 
14 12/17/2014

15
16
17
18
19
20
21
22
23
24
25
26
27 DA#14F14785X/hjc/SUV
28 LVMPD EV#1409151583
(TK3)



ORIGINAL
JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

FILED IN OPEN COURT

12-15-15
12 Coch
CLARK

2 THE STATE OF NEVADA,

3 Plaintiff,

4 -VS-

5 CHRISTOPHER SENA,
6 #0779849,

7 Defendant.

CASE NO: 14F14785X

DEPT NO: 3

3rd
~~FOURTH~~ AMENDED

CRIMINAL COMPLAINT

8 The Defendant above named having committed the crimes of CONSPIRACY TO
9 COMMIT SEXUAL ASSAULT (Category B Felony - NRS 200.364, 200.366, 199.480 -
10 NOC 50131), SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
11 AGE (Category A Felony - NRS 200.364, 200.366 - NOC 50105), LEWDNESS WITH A
12 CHILD UNDER THE AGE OF 14 (Category A Felony - NRS 201.230 - NOC 50975),
13 SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE (Category
14 A Felony - NRS 200.364, 200.366 - NOC 50106), INCEST (Category A Felony - NRS
15 201.180 - NOC 50957), OPEN OR GROSS LEWDNESS (Category D Felony - NRS
16 201.210 - NOC 50972), SEXUAL ASSAULT (Category A Felony - NRS 200.364, 200.366
17 - NOC 50095), PREVENTING OR DISSUADING WITNESS OR VICTIM FROM
18 REPORTING CRIME OR COMMENCING PROSECUTION (Category D Felony -
19 NRS 199.305 - NOC 52996), CHILD ABUSE AND NEGLECT, SEXUAL ABUSE OR
20 EXPLOITATION (Category A Felony - NRS 200.508(1) - NOC 55220), POSSESSION
21 OF VISUAL PRESENTATION DEPICTING SEXUAL CONDUCT OF A CHILD
22 (Category B Felony - NRS 200.700, 200.730 - NOC 50374), USE OF MINOR IN
23 PRODUCING PORNOGRAPHY (Category A Felony - NRS 200.700, 200.710.1, 200.750
24 - NOC 50367) and USE OF MINOR UNDER THE AGE OF 14 IN PRODUCING
25 PORNOGRAPHY (Category A Felony - NRS 200.700, 200.710.1, 200.750 - NOC 50368)
26 in the manner following:

27 That the said Defendant, on or between May 22, 2001 and June 30, 2014, at and within
28 the County of Clark, State of Nevada,

1 COUNT 1 - CONSPIRACY TO COMMIT SEXUAL ASSAULT

2 did, on or between May 22, 2007 and June 30, 2014, willfully, unlawfully, and
3 feloniously conspire with DEBORAH SENA and/or TERRIE SENA and/or others unknown
4 to commit a sexual assault, by performing those acts described in Counts 46 through 52; 54
5 through 59; 61 through 77; 79 through 85; 95 through 99; 101 through 103; 105; 115; and 118.

6 COUNT 2 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

7 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully, lewdly,
8 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
9 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by
10 said Defendant using his hand(s) and/or finger(s) to touch and/or rub and or fondle the breast(s)
11 and/or area of the breast(s) of the said A.S., with the intent of arousing, appealing to, or
12 gratifying the lust, passions, or sexual desires of said Defendant, or said child.

13 COUNT 3 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
14 AGE

15 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully,
16 unlawfully, and feloniously sexually assault and subject A.S., a child under fourteen years of
17 age, to sexual penetration, to-wit: digital penetration, by said Defendant inserting his hand(s)
18 and/or finger(s) into the genital opening of the said A.S., against the will of the said A.S., or
19 under conditions in which Defendant knew, or should have known, that A.S. was mentally or
20 physically incapable of resisting or understanding the nature of Defendant's conduct.

21 COUNT 4 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

22 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully, lewdly,
23 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
24 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by
25 said Defendant using his hand(s) and/or finger(s) to touch and/or rub and or fondle the genital
26 area of the said A.S., with the intent of arousing, appealing to, or gratifying the lust, passions,
27 or sexual desires of said Defendant, or said child.

28 //

1 COUNT 5 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

2 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully, lewdly,
3 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
4 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by
5 said Defendant using his penis to touch and/or rub and/or fondle the genital area of the said
6 A.S., with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires
7 of said Defendant, or said child.

8 COUNT 6 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
9 AGE

10 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully,
11 unlawfully, and feloniously sexually assault and subject A.S., a child under fourteen years of
12 age, to sexual penetration, to-wit: anal intercourse, by said Defendant inserting his penis into
13 the anal opening of the said A.S., against the will of the said A.S., or under conditions in which
14 Defendant knew, or should have known, that A.S. was mentally or physically incapable of
15 resisting or understanding the nature of Defendant's conduct.

16 COUNT 7 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

17 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully, lewdly,
18 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
19 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by
20 said Defendant using his penis to touch and/or rub and or fondle the anal area of the said A.S.,
21 with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of
22 said Defendant, or said child.

23 COUNT 8 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
24 AGE

25 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully,
26 unlawfully, and feloniously sexually assault and subject A.S., a child under fourteen years of
27 age, to sexual penetration, to-wit: anal intercourse, by said Defendant inserting his penis into
28 the anal opening of the said A.S., against the will of the said A.S., or under conditions in which

1 Defendant knew, or should have known, that A.S. was mentally or physically incapable of
2 resisting or understanding the nature of Defendant's conduct.

3 COUNT 9 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

4 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully, lewdly,
5 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
6 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by
7 said Defendant using his penis to touch and/or rub and or fondle the anal and/or genital area
8 of the said A.S., with the intent of arousing, appealing to, or gratifying the lust, passions, or
9 sexual desires of said Defendant, or said child.

10 COUNT 10 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

11 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully, lewdly,
12 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
13 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by
14 said Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the
15 breast(s) of the said A.S., with the intent of arousing, appealing to, or gratifying the lust,
16 passions, or sexual desires of said Defendant, or said child.

17 COUNT 11 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
18 AGE

19 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully,
20 unlawfully, and feloniously sexually assault and subject A.S., a child under fourteen years of
21 age, to sexual penetration, to-wit: anal intercourse, by said Defendant inserting his penis into
22 the anal opening of the said A.S., against the will of the said A.S., or under conditions in which
23 Defendant knew, or should have known, that A.S. was mentally or physically incapable of
24 resisting or understanding the nature of Defendant's conduct.

25 COUNT 12 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

26 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully, lewdly,
27 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
28 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by

1 said Defendant using his penis to touch and/or rub and or fondle the anal area of the said A.S.,
2 with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of
3 said Defendant, or said child.

4 COUNT 13 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

5 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully, lewdly,
6 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
7 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by
8 said Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the
9 breast(s) of the said A.S., with the intent of arousing, appealing to, or gratifying the lust,
10 passions, or sexual desires of said Defendant, or said child.

11 COUNT 14 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
12 AGE

13 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully,
14 unlawfully, and feloniously sexually assault and subject A.S., a child under fourteen years of
15 age, to sexual penetration, to-wit: fellatio, by said Defendant causing the said A.S. to have the
16 penis of the said Defendant on and/or in the mouth of the said A.S., against the will of the said
17 A.S., or under conditions in which Defendant knew, or should have known, that A.S. was
18 mentally or physically incapable of resisting or understanding the nature of Defendant's
19 conduct.

20 COUNT 15 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

21 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully, lewdly,
22 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
23 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by
24 said Defendant using his penis to touch and/or rub and/or fondle the mouth of the said A.S.,
25 with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of
26 said Defendant, or said child.

27 //

28 //

1 COUNT 16 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
2 AGE

3 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully,
4 unlawfully, and feloniously sexually assault and subject A.S., a child under fourteen years of
5 age, to sexual penetration, to-wit: anal intercourse, by said Defendant inserting his penis into
6 the anal opening of the said A.S., against the will of the said A.S., or under conditions in which
7 Defendant knew, or should have known, that A.S. was mentally or physically incapable of
8 resisting or understanding the nature of Defendant's conduct.

9 COUNT 17 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

10 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully, lewdly,
11 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
12 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by
13 said Defendant using his penis to touch and/or rub and or fondle the anal area of the said A.S.,
14 with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of
15 said Defendant, or said child.

16 COUNT 18 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

17 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully, lewdly,
18 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
19 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by
20 said Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the
21 breast(s) of the said A.S., with the intent of arousing, appealing to, or gratifying the lust,
22 passions, or sexual desires of said Defendant, or said child.

23 COUNT 19 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
24 AGE

25 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully,
26 unlawfully, and feloniously sexually assault and subject A.S., a child under fourteen years of
27 age, to sexual penetration, to-wit: fellatio, by said Defendant causing the said A.S. to have the
28 penis of the said Defendant on and/or in the mouth of the said A.S., against the will of the said

1 A.S., or under conditions in which Defendant knew, or should have known, that A.S. was
2 mentally or physically incapable of resisting or understanding the nature of Defendant's
3 conduct.

4 COUNT 20 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

5 did, on or between May 22, 2001 and May 21, 2004, then and there, willfully, lewdly,
6 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
7 or member thereof, a child, to-wit: A.S., said child being under the age of fourteen years, by
8 said Defendant using his penis to touch and/or rub and/or fondle the mouth of the said A.S.,
9 with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of
10 said Defendant, or said child.

11 COUNT 21 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

12 did, on or between May 22, 2004 and May 21, 2006, then and there, willfully,
13 unlawfully, and feloniously sexually assault and subject A.S., a child under sixteen years of
14 age, to sexual penetration, to-wit: sexual intercourse, by said Defendant inserting his penis
15 into the genital opening of the said A.S., against the will of the said A.S., or under conditions
16 in which Defendant knew, or should have known, that the said victim was mentally or
17 physically incapable of resisting or understanding the nature of Defendant's conduct.

18 COUNT 22 - INCEST

19 did, on or between May 22, 2004 and May 21, 2006, then and there willfully,
20 unlawfully, and feloniously commit fornication or adultery with and/or on A.S., the Daughter
21 of said Defendant, the Defendant and A.S. being within the degree of consanguinity within
22 which marriages are declared by law to be incestuous and void; the Defendant committing the
23 crime by engaging in sexual intercourse with the said A.S.

24 COUNT 23 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

25 did, on or between May 22, 2004 and May 21, 2006, then and there, willfully,
26 unlawfully, and feloniously sexually assault and subject A.S., a child under sixteen years of
27 age, to sexual penetration, to-wit: anal intercourse, by said Defendant inserting his penis into
28 the anal opening of the said A.S., against the will of the said A.S., or under conditions in which

1 Defendant knew, or should have known, that the said victim was mentally or physically
2 incapable of resisting or understanding the nature of Defendant's conduct.

3 COUNT 24 - OPEN OR GROSS LEWDNESS

4 did, on or between May 22, 2004 and May 21, 2006, willfully and unlawfully commit
5 an act of open or gross lewdness by said Defendant using his hand(s) and/or finger(s) to touch
6 and/or rub and/or fondle the breast(s) of A.S.

7 COUNT 25 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF
8 AGE

9 did, on or between May 22, 2004 and May 21, 2006, then and there, willfully,
10 unlawfully, and feloniously sexually assault and subject A.S., a child under sixteen years of
11 age, to sexual penetration, to-wit: fellatio, by said Defendant causing the said A.S. to have the
12 penis of the said Defendant on and/or in the mouth of the said A.S., against the will of the said
13 A.S., or under conditions in which Defendant knew, or should have known, that A.S. was
14 mentally or physically incapable of resisting or understanding the nature of Defendant's
15 conduct.

16 COUNT 26 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

17 did, on or between May 22, 2004 and May 21, 2006, then and there, willfully,
18 unlawfully, and feloniously sexually assault and subject A.S., a child under sixteen years of
19 age, to sexual penetration, to-wit: sexual intercourse, by said Defendant inserting his penis
20 into the genital opening of the said A.S., against the will of the said A.S., or under conditions
21 in which Defendant knew, or should have known, that the said victim was mentally or
22 physically incapable of resisting or understanding the nature of Defendant's conduct.

23 COUNT 27 - INCEST

24 did, on or between May 22, 2004 and May 21, 2006, then and there willfully,
25 unlawfully, and feloniously commit fornication or adultery with and/or on A.S., the Daughter
26 of said Defendant, the Defendant and A.S. being within the degree of consanguinity within
27 which marriages are declared by law to be incestuous and void; the Defendant committing the
28 crime by engaging in a sexual intercourse with the said A.S.

1 COUNT 28 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

2 did, on or between May 22, 2004 and May 21, 2006, then and there, willfully,
3 unlawfully, and feloniously sexually assault and subject A.S., a child under sixteen years of
4 age, to sexual penetration, to-wit: anal intercourse, by said Defendant inserting his penis into
5 the anal opening of the said A.S., against the will of the said A.S., or under conditions in which
6 Defendant knew, or should have known, that the said victim was mentally or physically
7 incapable of resisting or understanding the nature of Defendant's conduct.

8 COUNT 29 - OPEN OR GROSS LEWDNESS

9 did, on or between May 22, 2004 and May 21, 2006, willfully and unlawfully commit
10 an act of open or gross lewdness by said Defendant using his hand(s) and/or finger(s) to touch
11 and/or rub and/or fondle the breast(s) of A.S.

12 COUNT 30 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF
13 AGE

14 did, on or between May 22, 2004 and May 21, 2006, then and there, willfully,
15 unlawfully, and feloniously sexually assault and subject A.S., a child under sixteen years of
16 age, to sexual penetration, to-wit: fellatio, by said Defendant causing the said A.S. to have the
17 penis of the said Defendant on and/or in the mouth of the said A.S., against the will of the said
18 A.S., or under conditions in which Defendant knew, or should have known, that A.S. was
19 mentally or physically incapable of resisting or understanding the nature of Defendant's
20 conduct.

21 COUNT 31 - SEXUAL ASSAULT

22 did, on or between May 22, 2006 and August 30, 2014, then and there willfully,
23 unlawfully, and feloniously sexually assault and subject A.S. to sexual penetration, to-wit:
24 sexual intercourse, by said Defendant inserting his penis into the genital opening of the said
25 A.S., against the will of the said A.S., or under conditions in which Defendant knew, or should
26 have known, that A.S. was mentally or physically incapable of resisting or understanding the
27 nature of Defendant's conduct.

28 //

1 COUNT 32 - INCEST

2 did, on or between May 22, 2006 and August 30, 2014, then and there willfully,
3 unlawfully, and feloniously commit fornication or adultery with and/or on A.S., the Daughter
4 of said Defendant, the Defendant and A.S. being within the degree of consanguinity within
5 which marriages are declared by law to be incestuous and void; the Defendant committing the
6 crime by engaging in a sexual intercourse with the said A.S.

7 COUNT 33 - SEXUAL ASSAULT

8 did, on or between May 22, 2006 and August 30, 2014, then and there willfully,
9 unlawfully, and feloniously sexually assault and subject A.S. to sexual penetration, to-wit: anal
10 intercourse, by said Defendant inserting his penis into the anal opening of the said A.S., against
11 the will of the said A.S., or under conditions in which Defendant knew, or should have known,
12 that A.S. was mentally or physically incapable of resisting or understanding the nature of
13 Defendant's conduct.

14 COUNT 34 - OPEN OR GROSS LEWDNESS

15 did, on or between May 22, 2006 and August 30, 2014, willfully and unlawfully
16 commit an act of open or gross lewdness by said Defendant using his hand(s) and/or finger(s)
17 to touch and/or rub and/or fondle the breast(s) of A.S.

18 COUNT 35 - SEXUAL ASSAULT

19 did, on or between May 22, 2004 and May 21, 2006, then and there, willfully,
20 unlawfully, and feloniously sexually assault and subject A.S., to sexual penetration, to-wit:
21 fellatio, by said Defendant causing the said A.S. to have the penis of the said Defendant on
22 and/or in the mouth of the said A.S., against the will of the said A.S., or under conditions in
23 which Defendant knew, or should have known, that A.S. was mentally or physically incapable
24 of resisting or understanding the nature of Defendant's conduct.

25 COUNT 36 - SEXUAL ASSAULT

26 did, on or between May 22, 2006 and August 30, 2014, then and there willfully,
27 unlawfully, and feloniously sexually assault and subject A.S. to sexual penetration, to-wit:
28 sexual intercourse, by said Defendant inserting his penis into the genital opening of the said

1 A.S., against the will of the said A.S., or under conditions in which Defendant knew, or should
2 have known, that A.S. was mentally or physically incapable of resisting or understanding the
3 nature of Defendant's conduct.

4 COUNT 37 - INCEST

5 did, on or between May 22, 2006 and August 30, 2014, then and there willfully,
6 unlawfully, and feloniously commit fornication or adultery with and/or on A.S., the Daughter
7 of said Defendant, the Defendant and A.S. being within the degree of consanguinity within
8 which marriages are declared by law to be incestuous and void; the Defendant committing the
9 crime by engaging in a sexual intercourse with the said A.S.

10 COUNT 38 - SEXUAL ASSAULT

11 did, on or between May 22, 2006 and August 30, 2014, then and there willfully,
12 unlawfully, and feloniously sexually assault and subject A.S. to sexual penetration, to-wit: anal
13 intercourse, by said Defendant inserting his penis into the anal opening of the said A.S., against
14 the will of the said A.S., or under conditions in which Defendant knew, or should have known,
15 that A.S. was mentally or physically incapable of resisting or understanding the nature of
16 Defendant's conduct.

17 COUNT 39 - OPEN OR GROSS LEWDNESS

18 did, on or between May 22, 2006 and August 30, 2014, willfully and unlawfully
19 commit an act of open or gross lewdness by said Defendant using his hand(s) and/or finger(s)
20 to touch and/or rub and/or fondle the breast(s) of A.S.

21 COUNT 40 - SEXUAL ASSAULT

22 did, on or between May 22, 2004 and May 21, 2006, then and there, willfully,
23 unlawfully, and feloniously sexually assault and subject A.S., to sexual penetration, to-wit:
24 fellatio, by said Defendant causing the said A.S. to have the penis of the said Defendant on
25 and/or in the mouth of the said A.S., against the will of the said A.S., or under conditions in
26 which Defendant knew, or should have known, that A.S. was mentally or physically incapable
27 of resisting or understanding the nature of Defendant's conduct.

28 //

1 COUNT 41 - SEXUAL ASSAULT

2 did, on or between May 22, 2006 and August 30, 2014, then and there willfully,
3 unlawfully, and feloniously sexually assault and subject A.S. to sexual penetration, to-wit:
4 sexual intercourse, by said Defendant inserting his penis into the genital opening of the said
5 A.S., against the will of the said A.S., or under conditions in which Defendant knew, or should
6 have known, that A.S. was mentally or physically incapable of resisting or understanding the
7 nature of Defendant's conduct.

8 COUNT 42 - INCEST

9 did, on or between May 22, 2006 and August 30, 2014, then and there willfully,
10 unlawfully, and feloniously commit fornication or adultery with and/or on A.S., the Daughter
11 of said Defendant, the Defendant and A.S. being within the degree of consanguinity within
12 which marriages are declared by law to be incestuous and void; the Defendant committing the
13 crime by engaging in a sexual intercourse with the said A.S.

14 COUNT 43 - SEXUAL ASSAULT

15 did, on or between May 22, 2006 and August 30, 2014, then and there willfully,
16 unlawfully, and feloniously sexually assault and subject A.S. to sexual penetration, to-wit: anal
17 intercourse, by said Defendant inserting his penis into the anal opening of the said A.S., against
18 the will of the said A.S., or under conditions in which Defendant knew, or should have known,
19 that A.S. was mentally or physically incapable of resisting or understanding the nature of
20 Defendant's conduct.

21 COUNT 44 - OPEN OR GROSS LEWDNESS

22 did, on or between May 22, 2006 and August 30, 2014, willfully and unlawfully
23 commit an act of open or gross lewdness by said Defendant using his hand(s) and/or finger(s)
24 to touch and/or rub and/or fondle the breast(s) of A.S.

25 COUNT 45 - SEXUAL ASSAULT

26 did, on or between May 22, 2004 and May 21, 2006, then and there, willfully,
27 unlawfully, and feloniously sexually assault and subject A.S., to sexual penetration, to-wit:
28 fellatio, by said Defendant causing the said A.S. to have the penis of the said Defendant on

1 and/or in the mouth of the said A.S., against the will of the said A.S., or under conditions in
2 which Defendant knew, or should have known, that A.S. was mentally or physically incapable
3 of resisting or understanding the nature of Defendant's conduct.

4 COUNT 46 - SEXUAL ASSAULT

5 did, on or between May 22, 2007 and June 30, 2008, then and there willfully,
6 unlawfully, and feloniously sexually assault and subject A.S. to sexual penetration, to-wit:
7 sexual intercourse, by said Defendant inserting his penis into the genital opening of the said
8 A.S., against the will of the said A.S., or under conditions in which Defendant knew, or should
9 have known, that A.S. was mentally or physically incapable of resisting or understanding the
10 nature of Defendant's conduct; Defendant being liable under one or more of the following
11 principles of criminal liability: (1) by Defendant directly performing such acts; and/or (2) by
12 Defendant acting with DEBORAH SENA and/or others unknown pursuant to a conspiracy
13 with DEBORAH SENA and/or others unknown in performing such acts; and/or (3) by
14 Defendant and DEBORAH SENA and/or others unknown aiding and abetting each other by
15 counseling, encouraging, inducing, or otherwise procuring each other to commit such acts.

16 COUNT 47 - INCEST

17 did, on or between May 22, 2007 and June 30, 2008, willfully, unlawfully, and
18 feloniously commit fornication or adultery with and/or on A.S., the daughter of and A.S. being
19 within the degree of consanguinity within which marriages are declared by law to be
20 incestuous and void; the Defendant committing the crime by engaging in sexual intercourse
21 with said A.S.; Defendant being liable under one or more of the following principles of
22 criminal liability: (1) by Defendant directly performing such acts; and/or (2) by Defendant
23 acting with DEBORAH SENA and/or others unknown pursuant to a conspiracy with
24 DEBORAH SENA and/or others unknown in performing such acts; and/or (3) by Defendant
25 and DEBORAH SENA and/or others unknown aiding and abetting each other by counseling,
26 encouraging, inducing, or otherwise procuring each other to commit such acts.

27 //

28 //

1 COUNT 48 - SEXUAL ASSAULT

2 did, on or between May 22, 2007 and June 30, 2008, then and there willfully,
3 unlawfully, and feloniously sexually assault and subject A.S. to sexual penetration, to-wit:
4 digital penetration, by said Defendant causing the finger(s) of the said A.S. to be placed into
5 the genital opening of DEBORAH SENA, against the will of the said A.S., or under conditions
6 in which Defendant knew, or should have known, that A.S. was mentally or physically
7 incapable of resisting or understanding the nature of Defendant's conduct; Defendant being
8 liable under one or more of the following principles of criminal liability: (1) by Defendant
9 directly performing such acts; and/or (2) by Defendant acting with DEBORAH SENA and/or
10 others unknown pursuant to a conspiracy with DEBORAH SENA and/or others unknown in
11 performing such acts; and/or (3) by Defendant and DEBORAH SENA and/or others unknown
12 aiding and abetting each other by counseling, encouraging, inducing, or otherwise procuring
13 each other to commit such acts.

14 COUNT 49 - OPEN OR GROSS LEWDNESS

15 did, on or between May 22, 2007 and June 30, 2008, then and there willfully and
16 unlawfully commit an act of open or gross lewdness by said Defendant assisting and/or causing
17 DEBORAH SENA to use her hand(s) and/or finger(s) to touch and/or rub and/or fondle the
18 breast(s) and/or genital area of A.S.; Defendant being liable under one or more of the following
19 principles of criminal liability: (1) by Defendant directly performing such acts; and/or (2) by
20 Defendant acting with DEBORAH SENA and/or others unknown pursuant to a conspiracy
21 with DEBORAH SENA and/or others unknown in performing such acts; and/or (3) by
22 Defendant and DEBORAH SENA and/or others unknown aiding and abetting each other by
23 counseling, encouraging, inducing, or otherwise procuring each other to commit such acts.

24 COUNT 50 - OPEN OR GROSS LEWDNESS

25 did, on or between May 22, 2007 and June 30, 2008, then and there willfully and
26 unlawfully commit an act of open or gross lewdness by said Defendant assisting and/or causing
27 A.S. to use her hand(s) and/or finger(s) to touch and/or rub and/or fondle the breast(s) of
28 DEBORAH SENA; Defendant being liable under one or more of the following principles of

1 criminal liability: (1) by Defendant directly performing such acts; and/or (2) by Defendant
2 acting with DEBORAH SENA and/or others unknown pursuant to a conspiracy with
3 DEBORAH SENA and/or others unknown in performing such acts; and/or (3) by Defendant
4 and DEBORAH SENA and/or others unknown aiding and abetting each other by counseling,
5 encouraging, inducing, or otherwise procuring each other to commit such acts.

6 COUNT 51 - OPEN OR GROSS LEWDNESS

7 did, on or between May 22, 2007 and June 30, 2008, then and there willfully and
8 unlawfully commit an act of open or gross lewdness by said Defendant assisting and/or causing
9 A.S. to use her hand(s) and/or finger(s) to touch and/or rub and/or fondle the genital area of
10 the said A.S.; Defendant being liable under one or more of the following principles of criminal
11 liability: (1) by Defendant directly performing such acts; and/or (2) by Defendant acting with
12 DEBORAH SENA and/or others unknown pursuant to a conspiracy with DEBORAH SENA
13 and/or others unknown in performing such acts; and/or (3) by Defendant and DEBORAH
14 SENA and/or others unknown aiding and abetting each other by counseling, encouraging,
15 inducing, or otherwise procuring each other to commit such acts.

16 COUNT 52 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

17 did, on or between May 22, 2004 and May 21, 2006, then and there willfully,
18 unlawfully, and feloniously sexually assault and subject A.S., a child under sixteen years of
19 age, to sexual penetration, to-wit: anal intercourse, by said Defendant inserting his penis into
20 the anal opening of the said A.S., against the will of the said A.S., or under conditions in which
21 Defendant knew, or should have known, that A.S. was mentally or physically incapable of
22 resisting or understanding the nature of Defendant's conduct; Defendant being liable under one
23 or more of the following principles of criminal liability: (1) by Defendant directly performing
24 such acts; and/or (2) by Defendant acting with TERRIE SENA and/or others unknown
25 pursuant to a conspiracy with TERRIE SENA and/or others unknown in performing such acts;
26 and/or (3) by Defendant and TERRIE SENA and/or others unknown aiding and abetting each
27 other by counseling, encouraging, inducing, or otherwise procuring each other to commit such
28 acts.

1 COUNT 53 - PREVENTING OR DISSUADING WITNESS OR VICTIM FROM
2 REPORTING CRIME OR COMMENCING PROSECUTION

3 did, on or about May 22, 2001 and June 30, 2014, then and there, willfully, unlawfully,
4 and feloniously, by intimidation or threats, prevent or dissuade, or hinder or delay A.S., from
5 reporting a crime to anyone by said Defendant telling the said A.S. that the said Defendant
6 would kill and/or break the legs of the said A.S. and/or have A.S. taken away and sent to
7 juvenile detention if the said A.S. told anyone of the sexual acts the said A.S. was forced to
8 commit or have committed upon the said A.S.

9 COUNT 54 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

10 did, on or between December 2, 2008 and December 1, 2010, then and there willfully,
11 unlawfully, and feloniously sexually assault and subject T.S., a child under sixteen years of
12 age, to sexual penetration, to-wit: fellatio, by said Defendant assisting and/or causing the penis
13 of the said T.S. to be placed on and/or in the mouth of DEBORAH SENA, against the will of
14 the said T.S., or under conditions in which Defendant knew, or should have known, that T.S.
15 was mentally or physically incapable of resisting or understanding the nature of Defendant's
16 conduct; Defendant being liable under one or more of the following principles of criminal
17 liability: (1) by Defendant directly performing such acts; and/or (2) by Defendant acting with
18 DEBORAH SENA and/or others unknown pursuant to a conspiracy with DEBORAH SENA
19 and/or others unknown in performing such acts; and/or (3) by Defendant and DEBORAH
20 SENA and/or others unknown aiding and abetting each other by counseling, encouraging,
21 inducing, or otherwise procuring each other to commit such acts.

22 COUNT 55 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT - SEXUAL ABUSE

23 did, on or between December 2, 2008 and December 1, 2010, willfully, unlawfully,
24 and feloniously cause a child under the age of 18 years, to-wit: T.S. to suffer unjustifiable
25 physical pain or mental suffering as a result of abuse or neglect, to wit: sexual abuse, and/or
26 cause T.S. to be placed in a situation where the said T.S. might have suffered unjustifiable
27 physical pain or mental suffering as a result of abuse or neglect, to wit: sexual abuse, by said
28 Defendant causing and/or directing and/or encouraging the said T.S. to wash said DEBORAH

1 SENA as said DEBORAH SENA washed the said T.S. ; Defendant being liable under one or
2 more of the following principles of criminal liability: (1) by Defendant directly performing
3 such acts; and/or (2) by Defendant acting with DEBORAH SENA and/or others unknown
4 pursuant to a conspiracy with DEBORAH SENA and/or others unknown in performing such
5 acts; and/or (3) by Defendant and DEBORAH SENA and/or others unknown aiding and
6 abetting each other by counseling, encouraging, inducing, or otherwise procuring each other
7 to commit such acts.

8 COUNT 56 - OPEN OR GROSS LEWDNESS

9 did, on or between December 2, 2008 and December 1, 2010, willfully and unlawfully
10 commit an act of open or gross lewdness by said Defendant assisting and/or causing
11 DEBORAH SENA to get into a shower naked with T.S. and/or by said Defendant assisting
12 and/or causing DEBORAH SENA to cause and/or direct and/or encouraging the said T.S. to
13 wash DEBORAH SENA as DEBORAH SENA washed the said T.S.; Defendant being liable
14 under one or more of the following principles of criminal liability: (1) by Defendant directly
15 performing such acts; and/or (2) by Defendant acting with DEBORAH SENA and/or others
16 unknown pursuant to a conspiracy with DEBORAH SENA and/or others unknown in
17 performing such acts; and/or (3) by Defendant and DEBORAH SENA and/or others unknown
18 aiding and abetting each other by counseling, encouraging, inducing, or otherwise procuring
19 each other to commit such acts.

20 COUNT 57 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT - SEXUAL ABUSE

21 did, on or between December 2, 2008 and December 1, 2010, willfully, unlawfully,
22 and feloniously cause a child under the age of 18 years, to-wit: T.S. to suffer unjustifiable
23 physical pain or mental suffering as a result of abuse or neglect, to wit: sexual abuse, and/or
24 cause T.S. to be placed in a situation where the said T.S. might have suffered unjustifiable
25 physical pain or mental suffering as a result of abuse or neglect, to wit: sexual abuse, by
26 Defendant assisting and/or causing DEBORAH SENA to use her hand(s) and/or finger(s) to
27 touch and/or rub and/or fondle the penis of T.S., and/or having the penis of the said T.S.
28 between the legs and/or on the genital area of DEBORAH SENA; Defendant being liable

1 under one or more of the following principles of criminal liability: (1) by Defendant directly
2 performing such acts; and/or (2) by Defendant acting with DEBORAH SENA and/or others
3 unknown pursuant to a conspiracy with DEBORAH SENA and/or others unknown in
4 performing such acts; and/or (3) by Defendant and DEBORAH SENA and/or others unknown
5 aiding and abetting each other by counseling, encouraging, inducing, or otherwise procuring
6 each other to commit such acts.

7 COUNT 58 - OPEN OR GROSS LEWDNESS

8 did, on or between December 2, 2008 and December 1, 2010, wilfully and unlawfully
9 commit an act of open or gross lewdness by Defendant assiting and/or causing DEBORAH
10 SENA to use her hand(s) and/or finger(s) to touch and/or rub and/or fondle the penis of T.S.,
11 and/or having the penis of the said T.S. between the legs and/or on the genital area of
12 DEBORAH SENA; Defendant being liable under one or more of the following principles of
13 criminal liability: (1) by Defendant directly performing such acts; and/or (2) by Defendant
14 acting with DEBORAH SENA and/or others unknown pursuant to a conspiracy with
15 DEBORAH SENA and/or others unknown in performing such acts; and/or (3) by Defendant
16 and DEBORAH SENA and/or others unknown aiding and abetting each other by counseling,
17 encouraging, inducing, or otherwise procuring each other to commit such acts.

18 COUNT 59 - USE OF MINOR IN PRODUCING PORNOGRAPHY

19 did, on or between December 2, 2008 and December 1, 2010, then and there willfully,
20 unlawfully, feloniously and knowingly, use, encourage, entice or permit T.S., a minor under
21 the age of 18, to simulate or engage in, or assist others to simulate or engage in sexual conduct,
22 and/or be the subject of a sexual portrayal, to-wit: DEBORAH SENA and T.S. showering
23 together in the nude, for the purpose of producing a pornographic performance and that said
24 performance was video recorded by said Defendant; Defendant being liable under one or more
25 of the following principles of criminal liability: (1) by Defendant directly performing such
26 acts; and/or (2) by Defendant acting with DEBORAH SENA and/or others unknown pursuant
27 to a conspiracy with DEBORAH SENA and/or others unknown in performing such acts;
28 and/or (3) by Defendant and DEBORAH SENA and/or others unknown aiding and abetting

1 each other by counseling, encouraging, inducing, or otherwise procuring each other to commit
2 such acts.

3 COUNT 60 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
4 CONDUCT OF A CHILD

5 did, on or about the 18th day of September, 2014, then and there, feloniously,
6 knowingly and willfully have in his possession a film, photograph, or other visual presentation
7 depicting a child under the age of 16 years of age to simulate or engage in sexual conduct
8 and/or be the subject of a sexual portrayal, to-wit: DEBORAH SENA and T.S., a minor under
9 the age of sixteen (16) showering together in the nude.

10 COUNT 61 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

11 did, on or between December 2, 2008 and December 1, 2010, then and there willfully,
12 unlawfully, and feloniously sexually assault and subject T.S., a child under sixteen years of
13 age, to sexual penetration, to-wit: fellatio, by said Defendant assisting and/or causing
14 DEBORAH SENA to have the penis of the said T.S. on and/or in the mouth of DEBORAH
15 SENA, against the will of the said T.S., or under conditions in which Defendant knew, or
16 should have known, that T.S. was mentally or physically incapable of resisting or
17 understanding the nature of Defendant's conduct; Defendant being liable under one or more of
18 the following principles of criminal liability: (1) by Defendant directly performing such acts;
19 and/or (2) by Defendant acting with DEBORAH SENA and/or others unknown pursuant to a
20 conspiracy with DEBORAH SENA and/or others unknown in performing such acts; and/or
21 (3) by Defendant and DEBORAH SENA and/or others unknown aiding and abetting each
22 other by counseling, encouraging, inducing, or otherwise procuring each other to commit such
23 acts.

24 COUNT 62 - SEXUAL ASSAULT

25 did, on or between December 2, 2008 and December 1, 2012, then and there willfully,
26 unlawfully, and feloniously sexually assault and subject T.S. to sexual penetration, to-wit:
27 fellatio, by said Defendant assisting and/or causing DEBORAH SENA to have the penis of
28 the said T.S. on and/or in the mouth of DEBORAH SENA, against the will of the said T.S., or

1 under conditions in which Defendant knew, or should have known, that T.S. was mentally or
2 physically incapable of resisting or understanding the nature of Defendant's conduct;
3 Defendant being liable under one or more of the following principles of criminal liability: (1)
4 by Defendant directly performing such acts; and/or (2) by Defendant acting with DEBORAH
5 SENA and/or others unknown pursuant to a conspiracy with DEBORAH SENA and/or others
6 unknown in performing such acts; and/or (3) by Defendant and DEBORAH SENA and/or
7 others unknown aiding and abetting each other by counseling, encouraging, inducing, or
8 otherwise procuring each other to commit such acts.

9 COUNT 63 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

10 did, on or between December 2, 2008 and December 1, 2010, then and there willfully,
11 unlawfully, and feloniously sexually assault and subject T.S., a child under sixteen years of
12 age, to sexual penetration, to-wit: sexual intercourse, by said Defendant assisting and/or
13 causing DEBORAH SENA to have the penis of the said T.S. in the genital opening of
14 DEBORAH SENA, against the will of the said T.S., or under conditions in which Defendant
15 knew, or should have known, that T.S. was mentally or physically incapable of resisting or
16 understanding the nature of Defendant's conduct; Defendant being liable under one or more of
17 the following principles of criminal liability: (1) by Defendant directly performing such acts;
18 and/or (2) by Defendant acting with DEBORAH SENA and/or others unknown pursuant to a
19 conspiracy with DEBORAH SENA and/or others unknown in performing such acts; and/or
20 (3) by Defendant and DEBORAH SENA and/or others unknown aiding and abetting each
21 other by counseling, encouraging, inducing, or otherwise procuring each other to commit such
22 acts.

23 COUNT 64 - SEXUAL ASSAULT

24 did, on or between December 2, 2008 and December 1, 2012, then and there willfully,
25 unlawfully, and feloniously sexually assault and subject T.S. to sexual penetration, to-wit:
26 sexual intercourse, by said Defendant assisting and/or causing DEBORAH SENA to have the
27 penis of the said T.S. in the genital opening of DEBORAH SENA, against the will of the said
28 T.S., or under conditions in which Defendant knew, or should have known, that T.S. was

1 mentally or physically incapable of resisting or understanding the nature of Defendant's
2 conduct; Defendant being liable under one or more of the following principles of criminal
3 liability: (1) by Defendant directly performing such acts; and/or (2) by Defendant acting with
4 DEBORAH SENA and/or others unknown pursuant to a conspiracy with DEBORAH SENA
5 and/or others unknown in performing such acts; and/or (3) by Defendant and DEBORAH
6 SENA and/or others unknown aiding and abetting each other by counseling, encouraging,
7 inducing, or otherwise procuring each other to commit such acts.

8 COUNT 65 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

9 did, on or between December 2, 2008 and December 1, 2010, then and there willfully,
10 unlawfully, and feloniously sexually assault and subject T.S., a child under sixteen years of
11 age, to sexual penetration, to-wit: sexual intercourse, by said Defendant assisting and/or
12 causing DEBORAH SENA to have the penis of the said T.S. in the genital opening of
13 DEBORAH SENA, against the will of the said T.S., or under conditions in which Defendant
14 knew, or should have known, that T.S. was mentally or physically incapable of resisting or
15 understanding the nature of Defendant's conduct; Defendant being liable under one or more of
16 the following principles of criminal liability: (1) by Defendant directly performing such acts;
17 and/or (2) by Defendant acting with DEBORAH SENA and/or others unknown pursuant to a
18 conspiracy with DEBORAH SENA and/or others unknown in performing such acts; and/or
19 (3) by Defendant and DEBORAH SENA and/or others unknown aiding and abetting each
20 other by counseling, encouraging, inducing, or otherwise procuring each other to commit such
21 acts.

22 COUNT 66 - SEXUAL ASSAULT

23 did, on or between December 2, 2008 and December 1, 2012, then and there willfully,
24 unlawfully, and feloniously sexually assault and subject T.S., a child under sixteen years of
25 age, to sexual penetration, to-wit: sexual intercourse, by said Defendant assisting and/or
26 causing DEBORAH SENA to have the penis of the said T.S. in the genital opening of
27 DEBORAH SENA, against the will of the said T.S., or under conditions in which Defendant
28 knew, or should have known, that T.S. was mentally or physically incapable of resisting or

1 understanding the nature of Defendant's conduct; Defendant being liable under one or more of
2 the following principles of criminal liability: (1) by Defendant directly performing such acts;
3 and/or (2) by Defendant acting with DEBORAH SENA and/or others unknown pursuant to a
4 conspiracy with DEBORAH SENA and/or others unknown in performing such acts; and/or
5 (3) by Defendant and DEBORAH SENA and/or others unknown aiding and abetting each
6 other by counseling, encouraging, inducing, or otherwise procuring each other to commit such
7 acts.

8 COUNT 67 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

9 did, on or between December 2, 2008 and December 1, 2010, then and there willfully,
10 unlawfully, and feloniously sexually assault and subject T.S., a child under sixteen years of
11 age, to sexual penetration, to-wit: fellatio, by said Defendant assisting and/or causing
12 DEBORAH SENA to have the penis of the said T.S. on and/or in the mouth of DEBORAH
13 SENA, against the will of the said T.S., or under conditions in which Defendant knew, or
14 should have known, that T.S. was mentally or physically incapable of resisting or
15 understanding the nature of Defendant's conduct; Defendant being liable under one or more of
16 the following principles of criminal liability: (1) by Defendant directly performing such acts;
17 and/or (2) by Defendant acting with DEBORAH SENA and/or others unknown pursuant to a
18 conspiracy with DEBORAH SENA and/or others unknown in performing such acts; and/or
19 (3) by Defendant and DEBORAH SENA and/or others unknown aiding and abetting each
20 other by counseling, encouraging, inducing, or otherwise procuring each other to commit such
21 acts.

22 COUNT 68 - SEXUAL ASSAULT

23 did, on or between December 2, 2008 and December 1, 2012, then and there willfully,
24 unlawfully, and feloniously sexually assault and subject T.S. to sexual penetration, to-wit:
25 fellatio, by said Defendant assisting and/or causing DEBORAH SENA to have the penis of
26 the said T.S. on and/or in the mouth of DEBORAH SENA, against the will of the said T.S., or
27 under conditions in which Defendant knew, or should have known, that T.S. was mentally or
28 physically incapable of resisting or understanding the nature of Defendant's conduct;

1 Defendant being liable under one or more of the following principles of criminal liability: (1)
2 by Defendant directly performing such acts; and/or (2) by Defendant acting with DEBORAH
3 SENA and/or others unknown pursuant to a conspiracy with DEBORAH SENA and/or others
4 unknown in performing such acts; and/or (3) by Defendant and DEBORAH SENA and/or
5 others unknown aiding and abetting each other by counseling, encouraging, inducing, or
6 otherwise procuring each other to commit such acts.

7 COUNT 69 - USE OF MINOR IN PRODUCING PORNOGRAPHY

8 did, on or between December 2, 2008 and December 1, 2013, then and there willfully,
9 unlawfully, feloniously and knowingly, use, encourage, entice or permit T.S., a minor under
10 the age of 18, to simulate or engage in, or assist others to simulate or engage in sexual conduct,
11 and/or be the subject of a sexual portrayal, to-wit: DEBORAH SENA engaging in sexual
12 intercourse with and performing fellatio on T.S., for the purpose of producing a pornographic
13 performance and that said performance was video recorded by said Defendant; Defendant
14 being liable under one or more of the following principles of criminal liability: (1) by
15 Defendant directly performing such acts; and/or (2) by Defendant acting with DEBORAH
16 SENA and/or others unknown pursuant to a conspiracy with DEBORAH SENA and/or others
17 unknown in performing such acts; and/or (3) by Defendant and DEBORAH SENA and/or
18 others unknown aiding and abetting each other by counseling, encouraging, inducing, or
19 otherwise procuring each other to commit such acts.

20 COUNT 70 CHILD ABUSE, NEGLECT, OR ENDANGERMENT - SEXUAL ABUSE

21 did, on or between August 13, 2011 and June 30, 2014, willfully, unlawfully, and
22 feloniously cause a child under the age of 18 years, to-wit: B.S. to suffer unjustifiable physical
23 pain or mental suffering as a result of abuse or neglect, to wit: sexual abuse, and/or cause B.S.
24 to be placed in a situation where the said B.S. might have suffered unjustifiable physical pain
25 or mental suffering as a result of abuse or neglect, to wit: sexual abuse, by said Defendant
26 causing B.S. to remove his clothes and get into a pool with Defendant and Deborah Sena, both
27 of whom were also nude, as Defendant and DEBORAH SENA proceeded to have sexual
28 intercourse in the presence of B.S.; Defendant being liable under one or more of the following

1 principles of criminal liability: (1) by Defendant directly performing such acts; and/or (2) by
2 Defendant acting with DEBORAH SENA and/or others unknown pursuant to a conspiracy
3 with DEBORAH SENA and/or others unknown in performing such acts; and/or (3) by
4 Defendant and DEBORAH SENA and/or others unknown aiding and abetting each other by
5 counseling, encouraging, inducing, or otherwise procuring each other to commit such acts.

6 COUNT 71 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

7 did, on or between August 13, 2011 and June 30, 2014, then and there willfully,
8 unlawfully, and feloniously sexually assault and subject B.S., a child under sixteen years of
9 age, to sexual penetration, to-wit: fellatio, by said Defendant assisting and/or causing the said
10 DEBORAH SENA to have the penis of the said B.S. on and/or in the mouth of DEBORAH
11 SENA, against the will of the said B.S., or under conditions in which Defendant knew, or
12 should have known, that B.S. was mentally or physically incapable of resisting or
13 understanding the nature of Defendant's conduct; Defendant being liable under one or more of
14 the following principles of criminal liability: (1) by Defendant directly performing such acts;
15 and/or (2) by Defendant acting with DEBORAH SENA and/or others unknown pursuant to a
16 conspiracy with DEBORAH SENA and/or others unknown in performing such acts; and/or
17 (3) by Defendant and DEBORAH SENA and/or others unknown aiding and abetting each
18 other by counseling, encouraging, inducing, or otherwise procuring each other to commit such
19 acts.

20 COUNT 72 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

21 did, on or between August 13, 2011 and June 30, 2014, then and there willfully,
22 unlawfully, and feloniously sexually assault and subject B.S., a child under sixteen years of
23 age, to sexual penetration, to-wit: sexual intercourse, by said Defendant assisting and/or
24 causing the said DEBORAH SENA to have the penis of the said B.S. in the genital opening of
25 DEBORAH SENA, against the will of the said B.S., or under conditions in which Defendant
26 knew, or should have known, that B.S. was mentally or physically incapable of resisting or
27 understanding the nature of Defendant's conduct; Defendant being liable under one or more of
28 the following principles of criminal liability: (1) by Defendant directly performing such acts;

1 and/or (2) by Defendant acting with DEBORAH SENA and/or others unknown pursuant to a
2 conspiracy with DEBORAH SENA and/or others unknown in performing such acts; and/or
3 (3) by Defendant and DEBORAH SENA and/or others unknown aiding and abetting each
4 other by counseling, encouraging, inducing, or otherwise procuring each other to commit such
5 acts.

6 COUNT 73 - INCEST

7 did, on or between August 13, 2011 and June 30, 2014, willfully, unlawfully, and
8 feloniously assist and/or cause DEBORAH SENA to commit fornication or adultery with
9 and/or on B.S., the son of DEBORAH SENA; DEBORAH SENA and B.S. being within the
10 degree of consanguinity within which marriages are declared by law to be incestuous and void;
11 the Defendant committing the crime by assisting and/or causing DEBORAH SENA to engage
12 in sexual intercourse with B.S.; Defendant being liable under one or more of the following
13 principles of criminal liability: (1) by Defendant directly performing such acts; and/or (2) by
14 Defendant acting with DEBORAH SENA and/or others unknown pursuant to a conspiracy
15 with DEBORAH SENA and/or others unknown in performing such acts; and/or (3) by
16 Defendant and DEBORAH SENA and/or others unknown aiding and abetting each other by
17 counseling, encouraging, inducing, or otherwise procuring each other to commit such acts.

18 COUNT 74 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

19 did, on or between August 13, 2011 and June 30, 2014, then and there willfully,
20 unlawfully, and feloniously sexually assault and subject B.S., a child under sixteen years of
21 age, to sexual penetration, to-wit: sexual intercourse, by said Defendant assisting and/or
22 causing DEBORAH SENA to have the penis of the said B.S. in the genital opening of
23 DEBORAH SENA, against the will of the said B.S., or under conditions in which Defendant
24 knew, or should have known, that B.S. was mentally or physically incapable of resisting or
25 understanding the nature of Defendant's conduct; Defendant being liable under one or more of
26 the following principles of criminal liability: (1) by Defendant directly performing such acts;
27 and/or (2) by Defendant acting with DEBORAH SENA and/or others unknown pursuant to a
28 conspiracy with DEBORAH SENA and/or others unknown in performing such acts; and/or

1 (3) by Defendant and DEBORAH SENA and/or others unknown aiding and abetting each
2 other by counseling, encouraging, inducing, or otherwise procuring each other to commit such
3 acts.

4 COUNT 75 - INCEST

5 did, on or between August 13, 2011 and June 30, 2014, willfully, unlawfully, and
6 feloniously assist and/or cause DEBORAH SENA to commit fornication or adultery with
7 and/or on B.S., the son of DEBORAH SENA; DEBORAH SENA and B.S. being within the
8 degree of consanguinity within which marriages are declared by law to be incestuous and void;
9 the Defendant committing the crime by assisting and/or causing DEBORAH SENA to engage
10 in sexual intercourse with B.S.; Defendant being liable under one or more of the following
11 principles of criminal liability: (1) by Defendant directly performing such acts; and/or (2) by
12 Defendant acting with DEBORAH SENA and/or others unknown pursuant to a conspiracy
13 with DEBORAH SENA and/or others unknown in performing such acts; and/or (3) by
14 Defendant and DEBORAH SENA and/or others unknown aiding and abetting each other by
15 counseling, encouraging, inducing, or otherwise procuring each other to commit such acts.

16 COUNT 76 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

17 did, on or between August 13, 2011 and June 30, 2014, then and there willfully,
18 unlawfully, and feloniously sexually assault and subject B.S., a child under sixteen years of
19 age, to sexual penetration, to-wit: fellatio, by said Defendant assisting and/or causing
20 DEBORAH SENA to have the penis of the said B.S. on and/or in the mouth of DEBORAH
21 SENA, against the will of the said B.S., or under conditions in which Defendant knew, or
22 should have known, that B.S. was mentally or physically incapable of resisting or
23 understanding the nature of Defendant's conduct; Defendant being liable under one or more of
24 the following principles of criminal liability: (1) by Defendant directly performing such acts;
25 and/or (2) by Defendant acting with DEBORAH SENA and/or others unknown pursuant to a
26 conspiracy with DEBORAH SENA and/or others unknown in performing such acts; and/or
27 (3) by Defendant and DEBORAH SENA and/or others unknown aiding and abetting each
28 other by counseling, encouraging, inducing, or otherwise procuring each other to commit such

1 acts.

2 COUNT 77 - USE OF MINOR IN PRODUCING PORNOGRAPHY

3 did, on or between August 13, 2011 and June 30, 2014, then and there willfully,
4 unlawfully, feloniously and knowingly, use, encourage, entice or permit B.S., a minor under
5 the age of 18, to simulate or engage in, or assist others to simulate or engage in sexual conduct,
6 and/or be the subject of a sexual portrayal, to-wit: DEBORAH SENA engaging in sexual
7 intercourse with and performing fellatio on B.S., for the purpose of producing a pornographic
8 performance and that said performance was video recorded by said Defendant; Defendant
9 being liable under one or more of the following principles of criminal liability: (1) by
10 Defendant directly performing such acts; and/or (2) by Defendant acting with DEBORAH
11 SENA and/or others unknown pursuant to a conspiracy with DEBORAH SENA and/or others
12 unknown in performing such acts; and/or (3) by Defendant and DEBORAH SENA and/or
13 others unknown aiding and abetting each other by counseling, encouraging, inducing, or
14 otherwise procuring each other to commit such acts.

15 COUNT 78 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
16 CONDUCT OF A CHILD

17 did, willfully, unlawfully, feloniously and knowingly have in his possession a film,
18 photograph, or other visual presentation depicting B.S., a child under the age of 16 years of
19 age, as the subject of a sexual portrayal or engaging in, simulating, or assisting others to engage
20 in or simulate sexual conduct, to-wit: a video showing DEBORAH SENA engaging in sexual
21 intercourse with and performing fellatio on B.S.

22 COUNT 79 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

23 did, on or between August 13, 2011 and June 30, 2014, then and there willfully,
24 unlawfully, and feloniously sexually assault and subject B.S., a child under sixteen years of
25 age, to sexual penetration, to-wit: fellatio, by said Defendant assisting and/or causing TERRIE
26 SENA to place her mouth on the penis of the said B.S., against the will of the said B.S., or
27 under conditions in which Defendant knew, or should have known, that B.S. was mentally or
28 physically incapable of resisting or understanding the nature of Defendant's conduct;

1 Defendant being liable under one or more of the following principles of criminal liability: (1)
2 by Defendant directly performing such acts; and/or (2) by Defendant acting with TERRIE
3 SENA and/or others unknown pursuant to a conspiracy with TERRIE SENA and/or others
4 unknown in performing such acts; and/or (3) by Defendant and TERRIE SENA and/or others
5 unknown aiding and abetting each other by counseling, encouraging, inducing, or otherwise
6 procuring each other to commit such acts.

7 COUNT 80 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

8 did, on or between August 13, 2011 and June 30, 2014, then and there willfully,
9 unlawfully, and feloniously sexually assault and subject B.S., a child under sixteen years of
10 age, to sexual penetration, to-wit: sexual intercourse, by said Defendant assisting and/or
11 causing TERRIE SENA to have the penis of the said B.S. in the genital opening of TERRIE
12 SENA, against the will of the said B.S., or under conditions in which Defendant knew, or
13 should have known, that B.S. was mentally or physically incapable of resisting or
14 understanding the nature of Defendant's conduct; Defendant being liable under one or more of
15 the following principles of criminal liability: (1) by Defendant directly performing such acts;
16 and/or (2) by Defendant acting with TERRIE SENA and/or others unknown pursuant to a
17 conspiracy with TERRIE SENA and/or others unknown in performing such acts; and/or (3)
18 by Defendant and TERRIE SENA and/or others unknown aiding and abetting each other by
19 counseling, encouraging, inducing, or otherwise procuring each other to commit such acts.

20 COUNT 81 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT - SEXUAL ABUSE

21 did, on or between August 13, 2011 and June 30, 2014, willfully, unlawfully, and
22 feloniously cause a child under the age of 18 years, to-wit: B.S. to suffer unjustifiable physical
23 pain or mental suffering as a result of abuse or neglect, to wit: sexual abuse, and/or cause B.S.
24 to be placed in a situation where the said B.S. might have suffered unjustifiable physical pain
25 or mental suffering as a result of abuse or neglect, to wit: sexual abuse, by said Defendant
26 causing and/or directing and/or encouraging the said B.S. to fondle the breast(s) of TERRIE
27 SENA; Defendant being liable under one or more of the following principles of criminal
28 liability: (1) by Defendant directly performing such acts; and/or (2) by Defendant acting with

1 TERRIE SENA and/or others unknown pursuant to a conspiracy with TERRIE SENA and/or
2 others unknown in performing such acts; and/or (3) by Defendant and TERRIE SENA and/or
3 others unknown aiding and abetting each other by counseling, encouraging, inducing, or
4 otherwise procuring each other to commit such acts.

5 COUNT 82 - OPEN OR GROSS LEWDNESS

6 did, on or between August 13, 2011 and June 30, 2014, willfully and unlawfully
7 commit an act of open or gross lewdness by said Defendant assisting and/or causing B.S. to
8 touch and/or rub and/or fondle the breast(s) of TERRIE SENA; Defendant being liable under
9 one or more of the following principles of criminal liability: (1) by Defendant directly
10 performing such acts; and/or (2) by Defendant acting with TERRIE SENA and/or others
11 unknown pursuant to a conspiracy with TERRIE SENA and/or others unknown in performing
12 such acts; and/or (3) by Defendant and TERRIE SENA and/or others unknown aiding and
13 abetting each other by counseling, encouraging, inducing, or otherwise procuring each other
14 to commit such acts.

15 COUNT 83 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

16 did, on or between August 13, 2011 and June 30, 2014, then and there willfully,
17 unlawfully, and feloniously sexually assault and subject B.S., a child under sixteen years of
18 age, to sexual penetration, to-wit: sexual intercourse, by said Defendant assisting and/or
19 causing TERRIE SENA to have the penis of the said B.S. in the genital opening of said
20 TERRIE SENA, against the will of the said B.S., or under conditions in which Defendant
21 knew, or should have known, that B.S. was mentally or physically incapable of resisting or
22 understanding the nature of Defendant's conduct; Defendant being liable under one or more of
23 the following principles of criminal liability: (1) by Defendant directly performing such acts;
24 and/or (2) by Defendant acting with TERRIE SENA and/or others unknown pursuant to a
25 conspiracy with TERRIE SENA and/or others unknown in performing such acts; and/or (3)
26 by Defendant and TERRIE SENA and/or others unknown aiding and abetting each other by
27 counseling, encouraging, inducing, or otherwise procuring each other to commit such acts.

28 //

1 COUNT 84 - CHILD ABUSE, NEGLECT, OR ENDANGERMENT - SEXUAL ABUSE

2 did, on or between August 13, 2011 and June 30, 2014, willfully, unlawfully, and
3 feloniously cause a child under the age of 18 years, to-wit: B.S. to suffer unjustifiable physical
4 pain or mental suffering as a result of abuse or neglect, to wit: sexual abuse, and/or cause B.S.
5 to be placed in a situation where the said B.S. might have suffered unjustifiable physical pain
6 or mental suffering as a result of abuse or neglect, to wit: sexual abuse, by said Defendant
7 causing and/or directing and/or encouraging the said B.S. to touch and/or rub and/or fondle
8 the breast(s) of TERRIE SENA; Defendant being liable under one or more of the following
9 principles of criminal liability: (1) by Defendant directly performing such acts; and/or (2) by
10 Defendant acting with TERRIE SENA and/or others unknown pursuant to a conspiracy with
11 TERRIE SENA and/or others unknown in performing such acts; and/or (3) by Defendant and
12 TERRIE SENA and/or others unknown aiding and abetting each other by counseling,
13 encouraging, inducing, or otherwise procuring each other to commit such acts.

14 COUNT 85 - OPEN OR GROSS LEWDNESS

15 did, on or between August 13, 2011 and June 30, 2014, willfully and unlawfully
16 commit an act of open or gross lewdness by said Defendant assisting and/or causing B.S. to
17 touch and/or rub and/or fondle the breast(s) of TERRIE SENA; Defendant being liable under
18 one or more of the following principles of criminal liability: (1) by Defendant directly
19 performing such acts; and/or (2) by Defendant acting with TERRIE SENA and/or others
20 unknown pursuant to a conspiracy with TERRIE SENA and/or others unknown in performing
21 such acts; and/or (3) by Defendant and TERRIE SENA and/or others unknown aiding and
22 abetting each other by counseling, encouraging, inducing, or otherwise procuring each other
23 to commit such acts.

24 COUNT 86 - PREVENTING OR DISSUADING WITNESS OR VICTIM FROM
25 REPORTING CRIME OR COMMENCING PROSECUTION

26 did, on or between August 13, 2011 and June 30, 2014, then and there, willfully,
27 unlawfully, and feloniously, by intimidation or threats, prevent or dissuade, or hinder or delay
28 B.S., from reporting a crime to anyone by said Defendant telling the said B.S. that the said

1 Defendant would break the legs of the said B.S. and/or kill the said B.S. if the said B.S. told
2 anyone of the sexual acts the said B.S. was forced to commit or have committed upon the said
3 B.S.

4 COUNT 87 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
5 AGE

6 did, on or between June 14, 2010 and June 13, 2012, then and there willfully,
7 unlawfully, and feloniously sexually assault and subject R.S., a child under fourteen years of
8 age, to sexual penetration, to-wit: anal intercourse, by said Defendant inserting his penis into
9 the anal opening of the said R.S., against the will of the said R.S., or under conditions in which
10 Defendant knew, or should have known, that R.S. was mentally or physically incapable of
11 resisting or understanding the nature of Defendant's conduct.

12 COUNT 88 - LEWDNESS WITH A MINOR UNDER THE AGE OF 14

13 did, on or between June 14, 2010 and June 13, 2012, willfully, lewdly, unlawfully, and
14 feloniously commit a lewd or lascivious act upon or with the body, or any part or member
15 thereof, of a child, to-wit: R.S., a child under the age of fourteen years, by said Defendant
16 using his penis to touch and/or rub and/or fondle the anal area of the said R.S., with the intent
17 of arousing, appealing to, or gratifying the lust, passions, or sexual desires of defendant, or
18 R.S.

19 COUNT 89 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
20 AGE

21 did, on or between June 14, 2010 and June 13, 2012, then and there willfully,
22 unlawfully, and feloniously sexually assault and subject R.S., a child under fourteen years of
23 age, to sexual penetration, to-wit: anal intercourse, by said Defendant inserting his penis into
24 the anal opening of the said R.S., against the will of the said R.S., or under conditions in which
25 Defendant knew, or should have known, that R.S. was mentally or physically incapable of
26 resisting or understanding the nature of Defendant's conduct.

27 //

28 //

1 COUNT 90 - LEWDNESS WITH A MINOR UNDER THE AGE OF 14

2 did, on or between June 14, 2010 and June 13, 2012, willfully, lewdly, unlawfully, and
3 feloniously commit a lewd or lascivious act upon or with the body, or any part or member
4 thereof, of a child, to-wit: R.S., a child under the age of fourteen years, by said Defendant
5 using his penis to touch and/or rub and/or fondle the anal area of the said R.S., with the intent
6 of arousing, appealing to, or gratifying the lust, passions, or sexual desires of defendant, or
7 R.S.

8 COUNT 91 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF
9 AGE

10 did, on or between June 14, 2010 and June 13, 2012, then and there willfully,
11 unlawfully, and feloniously sexually assault and subject R.S., a child under fourteen years of
12 age, to sexual penetration, to-wit: anal intercourse, by said Defendant inserting his penis into
13 the anal opening of the said R.S., against the will of the said R.S., or under conditions in which
14 Defendant knew, or should have known, that R.S. was mentally or physically incapable of
15 resisting or understanding the nature of Defendant's conduct.

16 COUNT 92 - LEWDNESS WITH A MINOR UNDER THE AGE OF 14

17 did, on or between June 14, 2010 and June 13, 2012, willfully, lewdly, unlawfully, and
18 feloniously commit a lewd or lascivious act upon or with the body, or any part or member
19 thereof, of a child, to-wit: R.S., a child under the age of fourteen years, by said Defendant
20 using his penis to touch and/or rub and/or fondle the anal area of the said R.S., with the intent
21 of arousing, appealing to, or gratifying the lust, passions, or sexual desires of defendant, or
22 R.S.

23 COUNT 93 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

24 did, on or between June 14, 2012 and June 13, 2014, then and there willfully,
25 unlawfully, and feloniously sexually assault and subject R.S., a child under sixteen years of
26 age, to sexual penetration, to-wit: anal intercourse, by said Defendant inserting his penis into
27 the anal opening of the said R.S., against the will of the said R.S., or under conditions in which
28 Defendant knew, or should have known, that R.S. was mentally or physically incapable of

1 resisting or understanding the nature of Defendant's conduct.

2 COUNT 94 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

3 did, on or between June 14, 2012 and June 13, 2014, then and there willfully,
4 unlawfully, and feloniously sexually assault and subject R.S., a child under sixteen years of
5 age, to sexual penetration, to-wit: anal intercourse, by said Defendant inserting his penis into
6 the anal opening of the said R.S., against the will of the said R.S., or under conditions in which
7 Defendant knew, or should have known, that R.S. was mentally or physically incapable of
8 resisting or understanding the nature of Defendant's conduct.

9 COUNT 95 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

10 did, on or between June 14, 2010 and June 13, 2014, then and there willfully,
11 unlawfully, and feloniously sexually assault and subject R.S., a child under sixteen years of
12 age, to sexual penetration, to-wit: fellatio, by said Defendant assisting and/or causing TERRIE
13 SENA to have the penis of the said R.S. on and/or in the mouth of said TERRIE SENA, against
14 the will of the said R.S., or under conditions in which Defendant knew, or should have known,
15 that R.S. was mentally or physically incapable of resisting or understanding the nature of
16 Defendant's conduct; Defendant being liable under one or more of the following principles of
17 criminal liability: (1) by Defendant directly performing such acts; and/or (2) by Defendant
18 acting with TERRIE SENA and/or others unknown pursuant to a conspiracy with TERRIE
19 SENA and/or others unknown in performing such acts; and/or (3) by Defendant and TERRIE
20 SENA and/or others unknown aiding and abetting each other by counseling, encouraging,
21 inducing, or otherwise procuring each other to commit such acts.

22 COUNT 96 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

23 did, on or between June 14, 2010 and June 13, 2014, then and there willfully,
24 unlawfully, and feloniously sexually assault and subject R.S., a child under sixteen years of
25 age, to sexual penetration, to-wit: sexual intercourse, by said Defendant assisting and/or
26 causing TERRIE SENA to have the penis of the said R.S. in the genital opening of said
27 TERRIE SENA, against the will of the said R.S., or under conditions in which Defendant
28 knew, or should have known, that R.S. was mentally or physically incapable of resisting or

1 understanding the nature of Defendant's conduct; Defendant being liable under one or more of
2 the following principles of criminal liability: (1) by Defendant directly performing such acts;
3 and/or (2) by Defendant acting with TERRIE SENA and/or others unknown pursuant to a
4 conspiracy with TERRIE SENA and/or others unknown in performing such acts; and/or (3)
5 by Defendant and TERRIE SENA and/or others unknown aiding and abetting each other by
6 counseling, encouraging, inducing, or otherwise procuring each other to commit such acts.

7 COUNT 97 - INCEST

8 did, on or between June 14, 2010 and June 13, 2014, willfully, unlawfully, and
9 feloniously assist and/or cause TERRIE SENA to commit fornication or adultery with and/or
10 on R.S., the son of TERRIE SENA; TERRIE SENA and R.S. being within the degree of
11 consanguinity within which marriages are declared by law to be incestuous and void; the
12 Defendant committing the crime by assisting and/or causing TERRIE SENA to engage in
13 sexual intercourse R.S.; Defendant being liable under one or more of the following principles
14 of criminal liability: (1) by Defendant directly performing such acts; and/or (2) by Defendant
15 acting with TERRIE SENA and/or others unknown pursuant to a conspiracy with TERRIE
16 SENA and/or others unknown in performing such acts; and/or (3) by Defendant and TERRIE
17 SENA and/or others unknown aiding and abetting each other by counseling, encouraging,
18 inducing, or otherwise procuring each other to commit such acts.

19 COUNT 98 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

20 did, on or between June 14, 2010 and June 13, 2014, then and there willfully,
21 unlawfully, and feloniously sexually assault and subject R.S., a child under sixteen years of
22 age, to sexual penetration, to-wit: fellatio, by said Defendant assisting and/or causing TERRIE
23 SENA to have the penis of the said R.S. on and/or in the mouth of TERRIE SENA, against the
24 will of the said R.S., or under conditions in which Defendant knew, or should have known,
25 that R.S. was mentally or physically incapable of resisting or understanding the nature of
26 Defendant's conduct; Defendant being liable under one or more of the following principles of
27 criminal liability: (1) by Defendant directly performing such acts; and/or (2) by Defendant
28 acting with TERRIE SENA and/or others unknown pursuant to a conspiracy with TERRIE

1 SENA and/or others unknown in performing such acts; and/or (3) by Defendant and TERRIE
2 SENA and/or others unknown aiding and abetting each other by counseling, encouraging,
3 inducing, or otherwise procuring each other to commit such acts.

4 COUNT 99 - USE OF MINOR IN PRODUCING PORNOGRAPHY

5 did, on or between June 14, 2010 and June 13, 2014, then and there willfully,
6 unlawfully, feloniously and knowingly, use, encourage, entice or permit R.S., a minor under
7 the age of 18, to simulate or engage in, or assist others to simulate or engage in sexual conduct,
8 and/or be the subject of a sexual portrayal, to-wit: TERRIE SENA engaging in sexual
9 intercourse with and performing fellatio on R.S., for the purpose of producing a pornographic
10 performance and that said performance was video recorded by said Defendant; Defendant
11 being liable under one or more of the following principles of criminal liability: (1) by
12 Defendant directly performing such acts; and/or (2) by Defendant acting with TERRIE SENA
13 and/or others unknown pursuant to a conspiracy with TERRIE SENA and/or others unknown
14 in performing such acts; and/or (3) by Defendant and TERRIE SENA and/or others unknown
15 aiding and abetting each other by counseling, encouraging, inducing, or otherwise procuring
16 each other to commit such acts.

17 COUNT 100 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL

18 CONDUCT OF A CHILD

19 did, willfully, unlawfully, feloniously and knowingly have in his possession a film,
20 photograph, or other visual presentation depicting R.S., a child under the age of 16 years of
21 age, as the subject of a sexual portrayal or engaging in, simulating, or assisting others to engage
22 in or simulate sexual conduct, to-wit: a video showing TERRIE SENA engaging in sexual
23 intercourse with and performing fellatio on R.S.

24 COUNT 101 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

25 did, on or between June 14, 2010 and June 13, 2014, then and there willfully,
26 unlawfully, and feloniously sexually assault and subject R.S., a child under sixteen years of
27 age, to sexual penetration, to-wit: fellatio, by said Defendant assisting and/or causing TERRIE
28 SENA to have the penis of the said R.S. on and/or in the mouth of TERRIE SENA, against the

1 will of the said R.S., or under conditions in which Defendant knew, or should have known,
2 that R.S. was mentally or physically incapable of resisting or understanding the nature of
3 Defendant's conduct; Defendant being liable under one or more of the following principles of
4 criminal liability: (1) by Defendant directly performing such acts; and/or (2) by Defendant
5 acting with TERRIE SENA and/or others unknown pursuant to a conspiracy with TERRIE
6 SENA and/or others unknown in performing such acts; and/or (3) by Defendant and TERRIE
7 SENA and/or others unknown aiding and abetting each other by counseling, encouraging,
8 inducing, or otherwise procuring each other to commit such acts.

9 COUNT 102 - SEXUAL ASSAULT WITH A MINOR UNDER SIXTEEN YEARS OF AGE

10 did, on or between June 14, 2010 and June 13, 2014, then and there willfully,
11 unlawfully, and feloniously sexually assault and subject R.S., a child under sixteen years of
12 age, to sexual penetration, to-wit: fellatio, by said Defendant assisting and/or causing TERRIE
13 SENA to have the penis of the said R.S. on and/or in the mouth of TERRIE SENA, against the
14 will of the said R.S., or under conditions in which Defendant knew, or should have known,
15 that R.S. was mentally or physically incapable of resisting or understanding the nature of
16 Defendant's conduct; Defendant being liable under one or more of the following principles of
17 criminal liability: (1) by Defendant directly performing such acts; and/or (2) by Defendant
18 acting with TERRIE SENA and/or others unknown pursuant to a conspiracy with TERRIE
19 SENA and/or others unknown in performing such acts; and/or (3) by Defendant and TERRIE
20 SENA and/or others unknown aiding and abetting each other by counseling, encouraging,
21 inducing, or otherwise procuring each other to commit such acts.

22 COUNT 103 - USE OF MINOR IN PRODUCING PORNOGRAPHY

23 did, on or between June 14, 2010 and June 13, 2014, then and there willfully,
24 unlawfully, feloniously and knowingly, use, encourage, entice or permit R.S., a minor under
25 the age of 18, to simulate or engage in, or assist others to simulate or engage in sexual conduct,
26 and/or be the subject of a sexual portrayal, to-wit: TERRIE SENA performing fellatio on R.S.,
27 for the purpose of producing a pornographic performance and that said performance was video
28 recorded by said Defendant; Defendant being liable under one or more of the following

1 principles of criminal liability: (1) by Defendant directly performing such acts; and/or (2) by
2 Defendant acting with TERRIE SENA and/or others unknown pursuant to a conspiracy with
3 TERRIE SENA and/or others unknown in performing such acts; and/or (3) by Defendant and
4 TERRIE SENA and/or others unknown aiding and abetting each other by counseling,
5 encouraging, inducing, or otherwise procuring each other to commit such acts.

6 COUNT 104 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
7 CONDUCT OF A CHILD

8 did, willfully, unlawfully, feloniously and knowingly have in his possession a film,
9 photograph, or other visual presentation depicting R.S., a child under the age of 16 years of
10 age, as the subject of a sexual portrayal or engaging in, simulating, or assisting others to engage
11 in or simulate sexual conduct, to-wit: a video showing TERRIE SENA performing fellatio on
12 R.S.

13 COUNT 105 - CHILD ABUSE, NEGLECT OR ENDANGERMENT - SEXUAL
14 EXPLOITATION

15 did, on or between June 14, 2010 and June 13, 2014, willfully, unlawfully, and
16 feloniously cause a child under the age of 18 years, to-wit: R.S. to suffer unjustifiable physical
17 pain or mental suffering as a result of abuse or neglect, to wit: sexual exploitation, and/or cause
18 R.S. to be placed in a situation where the said R.S. might have suffered unjustifiable physical
19 pain or mental suffering as a result of abuse or neglect, to wit: sexual exploitation, by said
20 Defendant causing the said R.S. to observe videos showing Defendant having sexual contact
21 with TERRIE SENA and/or pictures of DEBORAH SENA and TERRIE SENA in the nude
22 and/or a video which shows sexual contact between Defendant and/or TERRIE SENA and/or
23 DEBORAH SENA.

24 COUNT 106 - PREVENTING OR DISSUADING WITNESS OR VICTIM FROM
25 REPORTING CRIME OR COMMENCING PROSECUTION

26 did, on or between June 14, 2010 and June 13, 2014, then and there, willfully,
27 unlawfully, and feloniously, by intimidation or threats, prevent or dissuade, or hinder or delay
28 R.S., from reporting a crime to anyone by said Defendant telling the said R.S. that the said

1 Defendant would kill him and/or make his life a living hell if the said R.S. told anyone of the
2 sexual acts the said B.S. was forced to commit or have committed upon the said R.S.

3 COUNT 107 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

4 did, on or between December 21, 2010 and June 30, 2014, willfully, lewdly,
5 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
6 or member thereof, of a child, to-wit: E.C., a child under the age of fourteen years, by said
7 Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the genital area
8 of the said E.C., with the intent of arousing, appealing to, or gratifying the lust, passions, or
9 sexual desires of defendant, or E.C.

10 COUNT 108 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

11 did, on or between December 21, 2010 and June 30, 2014, willfully, lewdly,
12 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
13 or member thereof, of a child, to-wit: E.C., a child under the age of fourteen years, by said
14 Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the breast(s) of
15 the said E.C., with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual
16 desires of defendant, or E.C.

17 COUNT 109 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

18 did, on or between December 21, 2010 and June 30, 2014, willfully, lewdly,
19 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
20 or member thereof, of a child, to-wit: E.C., a child under the age of fourteen years, by said
21 Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the genital area
22 of the said E.C., with the intent of arousing, appealing to, or gratifying the lust, passions, or
23 sexual desires of defendant, or E.C.

24 COUNT 110 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

25 did, on or between December 21, 2010 and June 30, 2014, willfully, lewdly,
26 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
27 or member thereof, of a child, to-wit: E.C., a child under the age of fourteen years, by said
28 Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the breast(s) of

1 the said E.C., with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual
2 desires of defendant, or E.C.

3 COUNT 111 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

4 did, on or between December 21, 2010 and June 30, 2014, willfully, lewdly,
5 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
6 or member thereof, of a child, to-wit: E.C., a child under the age of fourteen years, by said
7 Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the genital area
8 of the said E.C., with the intent of arousing, appealing to, or gratifying the lust, passions, or
9 sexual desires of defendant, or E.C.

10 COUNT 112 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

11 did, on or between December 21, 2010 and June 30, 2014, willfully, lewdly,
12 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
13 or member thereof, of a child, to-wit: E.C., a child under the age of fourteen years, by said
14 Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the breast(s) of
15 the said E.C., with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual
16 desires of defendant, or E.C.

17 COUNT 113 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

18 did, on or between December 21, 2010 and June 30, 2014, willfully, lewdly,
19 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
20 or member thereof, of a child, to-wit: E.C., a child under the age of fourteen years, by said
21 Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the genital area
22 of the said E.C., with the intent of arousing, appealing to, or gratifying the lust, passions, or
23 sexual desires of defendant, or E.C.

24 COUNT 114 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

25 did, on or between December 21, 2010 and June 30, 2014, willfully, lewdly,
26 unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part
27 or member thereof, of a child, to-wit: E.C., a child under the age of fourteen years, by said
28 Defendant using his hand(s) and/or finger(s) to touch and/or rub and/or fondle the breast(s) of

1 the said E.C., with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual
2 desires of defendant, or E.C.

3 COUNT 115 - USE OF MINOR UNDER THE AGE OF 14 IN PRODUCING
4 PORNOGRAPHY

5 did, on or between December 21, 2010 and June 30, 2014, then and there willfully,
6 unlawfully, feloniously and knowingly, use, encourage, entice or permit E.C., a minor under
7 the age of 14, to simulate or engage in, or assist others to simulate or engage in sexual conduct,
8 and/or be the subject of a sexual portrayal, to-wit: E.C. showering in the nude, for the purpose
9 of producing a pornographic performance and that said performance was video recorded by
10 said Defendant and/or TERRIE SENA; Defendant being liable under one or more of the
11 following principles of criminal liability: (1) by Defendant directly performing such acts;
12 and/or (2) by Defendant acting with TERRIE SENA and/or others unknown pursuant to a
13 conspiracy with TERRIE SENA and/or others unknown in performing such acts; and/or (3)
14 by Defendant and TERRIE SENA and/or others unknown aiding and abetting each other by
15 counseling, encouraging, inducing, or otherwise procuring each other to commit such acts.

16 COUNT 116 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
17 CONDUCT OF A CHILD

18 did, on or about the 18th day of September, 2014, then and there, feloniously,
19 knowingly and willfully have in his possession a film, photograph, or other visual presentation
20 depicting a child under the age of 16 years of age to simulate or engage in sexual conduct
21 and/or be as the subject of a sexual portrayal, to-wit: E.C. in the nude.

22 COUNT 117 - CHILD ABUSE, NEGLECT OR ENDANGERMENT - SEXUAL
23 EXPLOITATION

24 did, on or between January 9, 2004 and January 8, 2013, willfully, unlawfully, and
25 feloniously cause a child under the age of 18 years, to-wit: T.G. to suffer unjustifiable physical
26 pain or mental suffering as a result of abuse or neglect, to wit: sexual exploitation, and/or cause
27 T.G. to be placed in a situation where the said T.G. might have suffered unjustifiable physical
28 pain or mental suffering as a result of abuse or neglect, to wit: sexual exploitation, by said

1 Defendant showing T.G. photos of nude individuals including individuals engaged in sexual
2 activity.

3 COUNT 118 - USE OF MINOR UNDER THE AGE OF 18 IN PRODUCING
4 PORNOGRAPHY

5 did, on or between January 9, 2004 and January 8, 2013, then and there willfully,
6 unlawfully, feloniously and knowingly, use, encourage, entice or permit T.G., a minor under
7 the age of 18, to simulate or engage in, or assist others to simulate or engage in sexual conduct,
8 and/or be the subject of a sexual portrayal, to-wit: said Defendant video recording T.G.
9 showering in the nude, for the purpose of producing a pornographic performance; Defendant
10 being liable under one or more of the following principles of criminal liability: (1) by
11 Defendant directly performing such acts; and/or (2) by Defendant acting with TERRIE SENA
12 and/or others unknown pursuant to a conspiracy with TERRIE SENA and/or others unknown
13 in performing such acts; and/or (3) by Defendant and TERRIE SENA and/or others unknown
14 aiding and abetting each other by counseling, encouraging, inducing, or otherwise procuring
15 each other to commit such acts.

16 COUNT 119 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
17 CONDUCT OF A CHILD

18 did, on or about the 18th day of September, 2014, then and there, feloniously,
19 knowingly and willfully have in his possession a film, photograph, or other visual presentation
20 depicting a child under the age of 16 years of age to simulate or engage in sexual conduct
21 and/or be the subject of a sexual portrayal, to-wit: T.G., a minor under the age of 16, showering
22 in the nude.

23 COUNT 120 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
24 CONDUCT OF A CHILD

25 did, willfully, unlawfully, feloniously and knowingly have in his possession a film,
26 photograph, or other visual presentation depicting M.C., a child under the age of 16 years of
27 age, as the subject of a sexual portrayal or engaging in, simulating, or assisting others to engage
28 in or simulate sexual conduct, to-wit: an image of the said M.C. sitting nude on a bed with a

1 vibrator between her legs.

2 COUNT 121 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
3 CONDUCT OF A CHILD

4 did, willfully, unlawfully, feloniously and knowingly have in his possession a film,
5 photograph, or other visual presentation depicting M.C., a child under the age of 16 years of
6 age, as the subject of a sexual portrayal or engaging in, simulating, or assisting others to engage
7 in or simulate sexual conduct, to-wit: an image of the said M.C. sitting nude on a bed with a
8 vibrator between her breasts.

9 COUNT 122 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
10 CONDUCT OF A CHILD

11 did, willfully, unlawfully, feloniously and knowingly have in his possession a film,
12 photograph, or other visual presentation depicting M.C., a child under the age of 16 years of
13 age, as the subject of a sexual portrayal or engaging in, simulating, or assisting others to engage
14 in or simulate sexual conduct, to-wit: an image of the said M.C. sitting nude on a bed with a
15 vibrator touching her mouth.

16 COUNT 123 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
17 CONDUCT OF A CHILD

18 did, willfully, unlawfully, feloniously and knowingly have in his possession a film,
19 photograph, or other visual presentation depicting M.C., a child under the age of 16 years of
20 age, as the subject of a sexual portrayal or engaging in, simulating, or assisting others to engage
21 in or simulate sexual conduct, to-wit: an image of the said M.C. sitting on a bed in the nude.

22 COUNT 124 - POSSESSION OF VISUAL PRESENTATION DEPICTING SEXUAL
23 CONDUCT OF A CHILD

24 did, willfully, unlawfully, feloniously and knowingly have in his possession a film,
25 photograph, or other visual presentation depicting M.C., a child under the age of 16 years of
26 age, as the subject of a sexual portrayal or engaging in, simulating, or assisting others to engage
27 in or simulate sexual conduct, to-wit: an image of the said M.C. kneeling on a bed in the nude
28 with an apparent vibrator between her legs.

1 All of which is contrary to the form, force and effect of Statutes in such cases made and
2 provided and against the peace and dignity of the State of Nevada. Said Complainant makes
3 this declaration subject to the penalty of perjury.

4
5 10/26/2015
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

27 DA#14F14785X/hjc/SUV
28 LVMPD EV#1409151583
(TK3)

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



14F14785X State of Nevada vs. Sena, Christopher

9/19/2014 7:30:00 AM 48 Hour Probable Cause

Result: Signing Completed

Review

**PARTIES
PRESENT:**

Judge: Marshall, Janiece

PROCEEDINGS

Hearings: 9/22/2014 8:00:00 AM: Arraignment

Added

Events: **Probable Cause Found**

Probable Cause Arrest Documents

Bail Reset

Bail Reset to:\$00/\$00 - total bail (SIC)

Bail Condition - Stay Away From Victim

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

9/22/2014 8:00:00 AM Arraignment

Result: Matter Heard

PARTIES
PRESENT: Attorney Shaygan-Fatemi, Kambiz
 Defendant Sena, Christopher

Judge: Marshall, Janiece
Prosecutor: Keeler, Brett
Court Reporter: Gardner, Cheryl
Court Clerk: Breland, Jourisha

PROCEEDINGS

Attorneys:	Public Defender	Sena, Christopher	Added
	Shaygan-Fatemi, Kambiz	Sena, Christopher	Added
Hearings:	9/24/2014 8:00:00 AM: Bail Hearing		Added
	10/22/2014 9:30:00 AM: Preliminary Hearing		Added
Events:	Arraignment Completed		
	<i>Advised of Charges on Criminal Complaint, Waives Reading of Criminal Complaint</i>		
	Public Defender Appointed		
	Status Check		
	<i>Bail hearing</i>		

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

9/24/2014 8:00:00 AM Bail Hearing

Result: Matter Heard

PARTIES
PRESENT: Attorney Schwartz, Jennifer L.
 Defendant Sena, Christopher

Judge: Marshall, Janiece

Prosecutor: Keeler, Brett

Court Reporter: Gardner, Cheryl

Court Clerk: Howard, Erika

PROCEEDINGS

Attorneys: **Schwartz, Jennifer L. Sena, Christopher**

Added

Events: **Side Bar Conference Held**

Bail Reset

Bail Reset to: \$250,000/250,000 Total Bail

No Contact with Victim

Future Court Date Stands

10/22/14

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

10/22/2014 8:00:00 AM Preliminary Hearing

Result: Matter Heard

PARTIES Attorney Radosta, Violet R
PRESENT: Defendant Sena, Christopher

Judge: Marshall, Janiece
Prosecutor: Duncan, Wesley
Court Reporter: Gardner, Cheryl
Court Clerk: Breland, Jourisha

PROCEEDINGS

Attorneys: **Radosta, Violet R** Sena, Christopher Added

Hearings: 11/6/2014 8:00:00 AM: Status Check Added

Events: **Amended Criminal Complaint**

Filed in open court

Motion to Continue - Defense

Granted

Preliminary Hearing

To be reset

Charges: **019: Sexual assault against child under 14**
020: Sexual assault against child under 14
021: Sexual assault against child under 14
022: Lewdness with child under age 14, first offense
023: PREVENT/DISUADE WITNESS/VICTIM F/REPORTING CRIME

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L004431017

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

11/6/2014 8:00:00 AM Status Check (In custody)

Result: Matter Heard

PARTIES PRESENT: Attorney Radosta, Violet R
Defendant Sena, Christopher

Judge: Marshall, Janiece
Prosecutor: Holthus, Mary
Court Reporter: Gardner, Cheryl
Court Clerk: Breland, Jourisha

PROCEEDINGS

Hearings: 11/25/2014 8:00:00 AM: Negotiations Added

Events: **Continued by Stipulation of Counsel**
Defense waives the 15 day rule
Continued For Negotiations

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L004487542

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

11/25/2014 8:00:00 AM Negotiations (In custody)

Result: Matter Heard

PARTIES PRESENT:	Attorney	Radosta, Violet R
	Defendant	Sena, Christopher
Judge:	Marshall, Janiece	
Prosecutor:	Flinn, William	
Court Reporter:	Gardner, Cheryl	
Court Clerk:	Breland, Jourisha	

PROCEEDINGS

Hearings:	12/16/2014 8:00:00 AM: Negotiations	Added
------------------	-------------------------------------	-------

Events:	Motion to Continue - Defense
----------------	-------------------------------------

Granted

Continued For Negotiations

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L004550785

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

12/16/2014 8:00:00 AM Negotiations (In custody)

Result: Matter Heard

PARTIES PRESENT: Attorney Radosta, Violet R
 Defendant Sena, Christopher

Judge: Marshall, Janiece

Prosecutor: Sweetin, Jim

Court Reporter: Gardner, Cheryl

Court Clerk: Breland, Jourisha

PROCEEDINGS

Hearings: 12/18/2014 8:00:00 AM: Status Check Added
 1/16/2015 8:00:00 AM: Status Check Added

Events: **Motion to Continue - State**

Granted

Status Check

On discovery

Status Check

Bail to be addressed and filing of Amended Criminal Complaint

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L004567297

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

12/18/2014 8:00:00 AM Status Check (In custody)

Result: Matter Heard

PARTIES PRESENT: Attorney Radosta, Violet R
Defendant Sena, Christopher

Judge: Marshall, Janiece
Prosecutor: Holthus, Mary
Court Reporter: Gardner, Cheryl
Court Clerk: Gonzalez, Rita

PROCEEDINGS

Hearings: 1/16/2015 8:00:00 AM: Status Check Canceled
1/23/2015 8:00:00 AM: Status Check Added

Events: Amended Criminal Complaint

Filed in open court (2nd)

Motion

By State to increase bail to \$2,000,000 - Objection by defense - Denied

Bail Reset - Cash or Surety

\$1,300,000 Total Bail plus house arrest

Comment

If bail is posted there is to be a source hearing

Bail Condition - Stay Away From Victim

Bail Condition

No contact with minors

Motion

By Defense that all discovery and interviews both audio and transcripts be retained even if the State does not file charges bases on those interviews

Future Court Date Vacated

01/16/14 at 8 am

Charges: Amended: 001: Child sexual abuse or exploitation, with substantial bodily or mental harm, child under 14 Court Ordered
Amended: 002: Child sexual abuse or exploitation, with substantial bodily or mental harm, child under 14 Court Ordered
Amended: 003: Child sexual abuse or exploitation, with substantial bodily or mental harm, child under 14 Court Ordered
Amended: 004: Child sexual abuse or exploitation, with substantial bodily or mental harm, child under 14 Court Ordered
Amended: 005: Child sexual abuse or exploitation, with substantial bodily or mental harm, child under 14 Court Ordered
Amended: 018: Sexual assault against child under 14 Court Ordered

Las Vegas Justice Court: Department 03

LVJC_RW_Criminal_MinuteOrder

11/20/2015 1:17 PM

Justice Court, Las Vegas Township Clark County, Nevada

Amended: 021: Lewdness with child under age 14, first offense

Court Ordered

**Amended: 022: PREVENT/DISUADE WITNESS/VICTIM
F/REPORTING CRIME**

Court Ordered

**Amended: 023: Possess visual pornography of person under age 16,
first offense**

Court Ordered

**024: Possess visual pornography of person under age 16, first
offense**

**025: Possess visual pornography of person under age 16, first
offense**

**026: Possess visual pornography of person under age 16, first
offense**

**027: Possess visual pornography of person under age 16, first
offense**

**028: Use or permit minor, under age 14, to be subject of sexual
portrayal in a performance**

**029: Possess visual pornography of person under age 16, first
offense**

030: Lewdness with child under age 14, first offense

031: Lewdness with child under age 14, first offense

032: Lewdness with child under age 14, first offense

033: Lewdness with child under age 14, first offense

**034: Use or permit minor, under age 14, to be subject of sexual
portrayal in a performance**

**035: Possess visual pornography of person under age 16, first
offense**

**036: Use or permit minor, under age 14, to be subject of sexual
portrayal in a performance**

**037: Possess visual pornography of person under age 16, first
offense**

**038: Use or permit minor, under age 14, to be subject of sexual
portrayal in a performance**

**039: Possess visual pornography of person under age 16, first
offense**

040: Promote sexual performance of minor, under age 14

041: Promote sexual performance of minor, under age 14

042: Sexual assault against child under 14

043: Sexual assault against child under 14

044: Sexual assault against child under 14

045: Sexual assault against child under 14

046: Sexual assault against child under 14

047: Sexual assault against child under 14

048: Sexual assault against child under 16

049: Sexual assault against child under 16

050: Sexual assault against child under 16

**Justice Court, Las Vegas Township
Clark County, Nevada**

051: Sexual assault against child under 16
052: COERCION-FORCE - SEXUALLY MOTIVATED
053: COERCION-FORCE - SEXUALLY MOTIVATED
054: Sexual assault against child under 14
055: Sexual assault against child under 14
056: Sexual assault against child under 14
057: Sexual assault against child under 14
058: Sexual assault against child under 14

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L004665495

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

1/23/2015 8:00:00 AM Status Check (In Custody)

Result: Matter Heard

PARTIES PRESENT: Attorney Radosta, Violet R
Defendant Sena, Christopher

Judge: Marshall, Janiece

Prosecutor: O'Halloran, Rachel

Court Reporter: Gardner, Cheryl

Court Clerk: Howard, Erika

PROCEEDINGS

Hearings: 2/19/2015 8:00:00 AM: Argument Added

4/13/2015 8:00:00 AM: Preliminary Hearing Added

4/14/2015 11:00:00 AM: Preliminary Hearing Added

Events: Comment

Defense provided with most of the discovery.

Motion

By Defense to have video turned over to them - Objection by State - Continued

Comment

State to prepare brief by 01/30/15

Defense to respond by 02/13/15

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L004763763

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

2/19/2015 8:00:00 AM Argument (In Custody)

Result: Matter Heard

PARTIES	Attorney	Radosta, Violet R
PRESENT:	Defendant	Sena, Christopher
Judge:	Marshall, Janiece	
Prosecutor:	Sweetin, Jim	
Court Reporter:	Gardner, Cheryl	
Court Clerk:	Howard, Erika	

PROCEEDINGS

Events: Order

Stipulation and order regarding discovery of child pornographic materials - filed in open court

Future Court Date Stands

4/13/15

4/14/15

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L004865773

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

**3/19/2015 8:00:00 AM Further Proceeding - Not
Calendared (In Custody)**

Result: Matter Heard

PARTIES	Attorney	Radosta, Violet R
PRESENT:	Defendant	Sena, Christopher

Judge: Marshall, Janiece

Prosecutor: Holthus, Mary

Court Reporter: Gardner, Cheryl

Court Clerk: Howard, Erika

PROCEEDINGS

Events: Comment

Defense Counsel to make request to Department 4 for Javs recording. Copies of the Preliminary Hearing transcripts from 2/18/15 and 2/19/15 in JC 4 to be given to the State.

Future Court Date Stands

4/13/15 11am

4/14/15 11am

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L004943389

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

4/13/2015 8:00:00 AM Preliminary Hearing (In Custody)

Result: Matter Heard

PARTIES PRESENT: Attorney Radosta, Violet R
Defendant Sena, Christopher

Judge: Marshall, Janiece

Prosecutor: Sweetin, Jim

Court Reporter: Gardner, Cheryl

Court Clerk: Breland, Jourisha

PROCEEDINGS

Hearings:	4/14/2015 11:00:00 AM: Preliminary Hearing	Canceled
	7/13/2015 10:00:00 AM: Preliminary Hearing	Added
	7/14/2015 11:00:00 AM: Preliminary Hearing	Added

Events: **Continued by Stipulation of Counsel**
Continued P/H Date to : 07/13/15 and 07/14/15

Defense waives the 15 day rule

Bail Stands

Counts: 001; 002; 003; 004; 005; 006; 007; 008; 009; 010; 011; 012; 013; 014; 015; 016; 017; 018; 019; 020; 021; 022; 023; 024; 025; 026; 027; 028; 029; 030; 031; 032; 033; 034; 035; 036; 037; 038; 039; 040; 041; 042; 043; 044; 045; 046; 047; 048; 049; 050; 051; 052; 053; 054; 055; 056; 057; 058

Future Court Date Vacated

04/14/15 11:00

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L005326021

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

7/13/2015 10:00:00 AM Preliminary Hearing (In custody)

Result: Matter Heard

PARTIES PRESENT: Attorney Radosta, Violet R
Defendant Sena, Christopher

Judge: Marshall, Janiece
Prosecutor: Holthus, Mary
Prosecutor: Sweetin, Jim
Court Reporter: Gardner, Cheryl
Court Clerk: Howard, Erika

PROCEEDINGS

Hearings:	7/14/2015 11:00:00 AM: Preliminary Hearing	Canceled
	8/13/2015 10:00:00 AM: Preliminary Hearing	Added
	8/14/2015 10:00:00 AM: Preliminary Hearing	Added
	7/30/2015 8:00:00 AM: Status Check	Added

Events: Motion by State to File an Amended Criminal Complaint

Objection by Defense - Granted

Copy of Amended Criminal Complaint to be given to Defense by July 17, 2015

Motion to Continue - Defense

Granted

Status Check

All discovery to be turned over to Defense

Bail Stands

*Counts: 001; 002; 003; 004; 005; 006; 007; 008; 009; 010; 011; 012; 013; 014; 015; 016; 017; 018; 019; 020; 021; 022; 023; 024; 025; 026; 027; 028; 029; 030; 031; 032; 033; 034; 035; 036; 037; 038; 039; 040; 041; 042; 043; 044; 045; 046; 047; 048; 049; 050; 051; 052; 053; 054; 055; 056; 057; 058;
\$1,300,000/1,300,000 Total Bail plus House Arrest and Source Hearing*

Future Court Date Vacated

7/14/15

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L005352201

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

7/30/2015 8:00:00 AM Status Check (In custody)

Result: Matter Heard

PARTIES PRESENT: Attorney Radosta, Violet R
Defendant Sena, Christopher

Judge: Marshall, Janiece

Prosecutor: Sweetin, Jim

Court Reporter: Gardner, Cheryl

Court Clerk: Gonzalez, Rita

PROCEEDINGS

Hearings:	8/13/2015 10:00:00 AM: Preliminary Hearing	Canceled
	8/14/2015 10:00:00 AM: Preliminary Hearing	Canceled
	8/27/2015 10:00:00 AM: Preliminary Hearing	Added
	8/28/2015 10:00:00 AM: Preliminary Hearing	Added

Events: Comment

Defense states she believes she has received all discovery

Bail Stands

Counts: 001; 002; 003; 004; 005; 006; 007; 008; 009; 010; 011; 012; 013; 014; 015; 016; 017; 018; 019; 020; 021; 022; 023; 024; 025; 026; 027; 028; 029; 030; 031; 032; 033; 034; 035; 036; 037; 038; 039; 040; 041; 042; 043; 044; 045; 046; 047; 048; 049; 050; 051; 052; 053; 054; 055; 056; 057; 058 -

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L005501024

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

8/27/2015 10:00:00 AM Preliminary Hearing (In Custody)

Result: Matter Heard

PARTIES PRESENT:	Attorney	Radosta, Violet R
	Attorney	Lopez-Negrete, David E.
	Defendant	Sena, Christopher

Judge: Marshall, Janiece
Prosecutor: Holthus, Mary
Prosecutor: Sweetin, Jim
Court Reporter: Gardner, Cheryl
Court Clerk: Howard, Erika

PROCEEDINGS

Attorneys:	Lopez-Negrete, David E.	Sena, Christopher	Added
Exhibits:	Other (ID: 001)	DVD	Admitted
			Offered
	Document, Photograph, Etc. (ID: 002-005)		Admitted
			Offered
	Document, Photograph, Etc. (ID: 007-009)		Admitted
	Document, Photograph, Etc. (ID: 011-024)		Admitted
Events:	Amended Minute Order		
	Motion by State to File an Amended Criminal Complaint		
	<i>Continued</i>		
	Preliminary Hearing Held		
	<i>Motion to Exclude Witnesses by State - Motion Granted</i>		
	<i>States Witnesses:</i>		
	<i>1. T. S. - Identified Defendant</i>		
	<i>2. M. C. - Identified Defendant</i>		
	<i>3. W. K.</i>		
	<i>4. V. R. - Identified Defendant</i>		
	<i>Preliminary Hearing continued</i>		
	Release Order - Court Ordered Bail AND House Arrest		
	<i>\$1,300,000/1,300,000 Total Bail</i>		
	Future Court Date Stands		
	<i>8/28/15 10am</i>		
	<i>Preliminary Hearing</i>		

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L005566807

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

8/28/2015 10:00:00 AM Preliminary Hearing (In Custody)

Result: Matter Heard

PARTIES PRESENT:
Attorney Radosta, Violet R
Attorney Lopez-Negrete, David E.
Defendant Sena, Christopher

Judge: Marshall, Janiece
Prosecutor: Sweetin, Jim
Prosecutor: Holthus, Mary
Court Reporter: Gardner, Cheryl
Court Clerk: Howard, Erika

PROCEEDINGS

Exhibits: **Document, Photograph, Etc. (ID: 006)** Admitted
Offered
Other (ID: 010) DVD Admitted

Hearings: 9/3/2015 10:00:00 AM: Preliminary Hearing Added

Events: **Amended Minute Order**
Continuation of Preliminary Hearing

State's Witnesses:

- 4. Continuation of V. R.
- 5. E. C. - Identified Defendant
- 6. T. G. - Identified Defendant
- 7. T. S. - Identified Defendant
- 8. B. S. - Identified Defendant

Preliminary Hearing continued

Bail Stands

Counts: 001; 002; 003; 004; 005; 006; 007; 008; 009; 010; 011; 012; 013; 014; 015; 016; 017; 018; 019; 020; 021; 022; 023; 024; 025; 026; 027; 028; 029; 030; 031; 032; 033; 034; 035; 036; 037; 038; 039; 040; 041; 042; 043; 044; 045; 046; 047; 048; 049; 050; 051; 052; 053; 054; 055; 056; 057; 058 - \$1,300,000/1,300,000 Total Bail and House Arrest

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L005566802

14F14785X

State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

9/3/2015 10:00:00 AM Preliminary Hearing (In custody)

Result: Matter Heard

PARTIES PRESENT:	Attorney	Radosta, Violet R
	Defendant	Sena, Christopher
Judge:	Marshall, Janiece	
Prosecutor:	Holthus, Mary	
Court Reporter:	Gardner, Cheryl	
Court Clerk:	Howard, Erika	

PROCEEDINGS

Hearings: 9/18/2015 10:00:00 AM: Preliminary Hearing

Added

Events: **Amended Minute Order**

Continuation of Preliminary Hearing

States witness:

9. A. S. - Identified Defendant

Preliminary Hearing continued

Bail Stands

Counts: 001; 002; 003; 004; 005; 006; 007; 008; 009; 010; 011; 012; 013; 014; 015; 016; 017; 018; 019; 020; 021; 022; 023; 024; 025; 026; 027; 028; 029; 030; 031; 032; 033; 034; 035; 036; 037; 038; 039; 040; 041; 042; 043; 044; 045; 046; 047; 048; 049; 050; 051; 052; 053; 054; 055; 056; 057; 058;
\$1,300,000/1,300,000 Total Bail and House Arrest

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L005555644

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

9/18/2015 10:00:00 AM Preliminary Hearing (In custody)

Result: Matter Heard

PARTIES PRESENT:	Attorney	Radosta, Violet R
	Attorney	Lopez-Negrete, David E.
	Defendant	Sena, Christopher

Judge: Marshall, Janiece
Prosecutor: Holthus, Mary
Prosecutor: Sweetin, Jim
Court Reporter: Gardner, Cheryl
Court Clerk: Gonzalez, Rita

PROCEEDINGS

Exhibits:

Hearings:	11/20/2015 10:30:00 AM: Argument	Added
------------------	----------------------------------	-------

Events: **Amended Minute Order**
Continuation of Preliminary Hearing

Comment

State makes representations that after last court date Channel 13 filmed and aired one of the victims on TV. Court admonishes media in the courtroom that this is unacceptable and not to film the victims in court today

Comment

Court orders courtroom cleared for the testimony by juvenile victim except for P. C. (Grandmother) - Objection by Defense as to having the Grandmother in the courtroom

Motion to Exclude Witnesses - Defense

Motion Granted

State Calls Witnesses

R.S. (minor) - ID Defendant

State Rests

Defense Rests

Comment

State and Defense to obtain transcript of todays proceeding by 10/05/15. State to file an amended criminal complaint as well as a brief by 10/19/15. Defense to file a brief by 11/02/15 and State to reply by 11/09/15.

Bail Stands

Counts: 001; 002; 003; 004; 005; 006; 007; 008; 009; 010; 011; 012; 013; 014; 015; 016; 017; 018; 019; 020; 021; 022; 023; 024; 025; 026; 027; 028; 029; 030; 031; 032; 033; 034; 035; 036; 037; 038; 039; 040; 041; 042; 043; 044; 045; 046; 047; 048; 049; 050; 051; 052; 053; 054; 055; 056; 057; 058 -

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

10/8/2015 8:00:00 AM Further Proceeding - Not Calendared (In custody)

Result: Matter Heard

**PARTIES
PRESENT:**

Judge: Marshall, Janiece

Court Clerk: Howard, Erika

PROCEEDINGS

Hearings:	11/20/2015 10:30:00 AM: Argument	Canceled
	11/23/2015 9:30:00 AM: Argument	Added
<hr/>		
Events:	Motion to Continue - Defense	
	<i>Granted</i>	
	Future Court Date Vacated	
	11/20/15	
	Bail Stands	
	<u>Counts: 001; 002; 003; 004; 005; 006; 007; 008; 009; 010; 011; 012; 013; 014; 015; 016; 017; 018; 019; 020; 021; 022; 023; 024; 025; 026; 027; 028; 029; 030; 031; 032; 033; 034; 035; 036; 037; 038; 039; 040; 041; 042; 043; 044; 045; 046; 047; 048; 049; 050; 051; 052; 053; 054; 055; 056; 057; 058</u>	

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L005833205

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

**11/30/2015 8:00:00 AM Further Proceeding - Not
Calendared (In custody)**

Result: Matter Heard

**PARTIES
PRESENT:**

Judge: Marshall, Janiece
Prosecutor: Sweetin, Jim
Court Reporter: Gardner, Cheryl
Court Clerk: Howard, Erika

PROCEEDINGS

Hearings:	12/1/2015 9:00:00 AM: Argument	Canceled
	12/14/2015 10:00:00 AM: Argument	Added

Events: Motion To Continue

Granted

Future Court Date Vacated

12/1/15

Bail Stands - Cash or Surety *Amount: \$1,300,000.00*

*Counts: 001; 002; 003; 004; 005; 006; 007; 008; 009; 010; 010; 011; 012; 013; 014; 015; 016; 017; 018;
019; 019; 020; 020; 021; 022; 023; 024; 025; 026; 027; 028; 029; 030; 031; 032; 033; 034; 035; 036;
037; 038; 039; 040; 041; 042; 043; 044; 045; 046; 047; 048; 049; 050; 051; 052; 053; 054; 055; 056;
057; 058 - \$1,300,000.00/\$1,300,000.00 Total Bail plus House Arrest*

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L005890101

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

**12/11/2015 8:00:00 AM Further Proceeding - Not
Calendared (In custody)**

Result: Matter Heard

**PARTIES
PRESENT:**

Judge: Marshall, Janiece

Court Clerk: Howard, Erika

PROCEEDINGS

Hearings: 12/15/2015 11:00:00 AM: Argument

Added

Events: **Motion To Continue**

Granted

Future Court Date Vacated

12/14/15

Bail Stands - Cash or Surety

Amount: \$1,300,000.00

*Counts: 001; 002; 003; 004; 005; 006; 007; 008; 009; 010; 010; 011; 012; 013; 014; 015; 016; 017; 018;
019; 019; 020; 020; 021; 022; 023; 024; 025; 026; 027; 028; 029; 030; 031; 032; 033; 034; 035; 036;
037; 038; 039; 040; 041; 042; 043; 044; 045; 046; 047; 048; 049; 050; 051; 052; 053; 054; 055; 056;
057; 058 - \$1,300,000.00/\$1,300,000.00 Total Bail plus House Arrest*

**Justice Court, Las Vegas Township
Clark County, Nevada**

Court Minutes



L005905562

14F14785X State of Nevada vs. Sena, Christopher

Lead Atty: Public Defender

12/15/2015 11:00:00 AM Argument (In custody)

Result: Bound Over

PARTIES	State of Nevada	State of Nevada
PRESENT:	Attorney	Radosta, Violet R
	Attorney	Public Defender
	Defendant	Sena, Christopher

Judge: Marshall, Janiece

Prosecutor: Sweetin, Jim

Court Reporter: Gardner, Cheryl

Court Clerk: Cochran, Deanna

PROCEEDINGS

Events: Amended Criminal Complaint

Third amended complaint filed in open Court

Bound Over to District Court as Charged

Review Date: 12/16/2015

State to strike Counts 115 & 118

Remand - Cash or Surety

Counts: 001; 002; 003; 004; 005; 006; 007; 008; 009; 010; 011; 012; 013; 014; 015; 016; 017; 018; 019; 020; 021; 022; 023; 024; 025; 026; 027; 028; 029; 030; 031; 032; 033; 034; 035; 036; 037; 038; 039; 040; 041; 042; 043; 044; 045; 046; 047; 048; 049; 050; 051; 052; 053; 054; 055; 056; 057; 058; 059; 060; 061; 062; 063; 064; 065; 066; 067; 068; 069; 070; 071; 072; 073; 074; 075; 076; 077; 078; 079; 080; 081; 082; 083; 084; 085; 086; 087; 088; 089; 090; 091; 092; 093; 094; 095; 096; 097; 098; 099; 100 - \$1,300,000.00/\$1,300,000.00 Total Bail

Case Closed - Bound Over

District Court Appearance Date Set

Jan 5 2016 10:00AM: In custody

Charges:	Amended: 003: Sexual assault against child under 14	Amended Complaint Filed
	Amended: 006: Sexual assault against child under 14	Amended Complaint Filed
	Amended: 016: Sexual assault against child under 14	Amended Complaint Filed
	Amended: 008: Sexual assault against child under 14	Amended Complaint Filed
	Amended: 011: Sexual assault against child under 14	Amended Complaint Filed
	Amended: 014: Sexual assault against child under 14	Amended Complaint Filed
	Amended: 002: Lewdness with child under age 14, first offense	Amended Complaint Filed
	Amended: 019: Sexual assault against child under 14	Amended Complaint Filed
	Amended: 004: Lewdness with child under age 14, first offense	Amended Complaint Filed
	Amended: 005: Lewdness with child under age 14, first offense	Amended Complaint Filed
	Amended: 021: Sexual assault against child under 16	Amended Complaint Filed
	Amended: 023: Sexual assault against child under 16	Amended Complaint Filed
	Amended: 025: Sexual assault against child under 16	Amended Complaint Filed

Justice Court, Las Vegas Township Clark County, Nevada

Amended: 026: Sexual assault against child under 16	Amended Complaint Filed
Amended: 022: Incest	Amended Complaint Filed
Amended: 032: Incest	Amended Complaint Filed
Amended: 027: Incest	Amended Complaint Filed
Amended: 071: Sexual assault against child under 16	Amended Complaint Filed
Amended: 072: Sexual assault against child under 16	Amended Complaint Filed
Amended: 074: Sexual assault against child under 16	Amended Complaint Filed
Amended: 082: Lewdness with child under age 14, first offense	Amended Complaint Filed
Amended: 086: PREVENT/DISUADE WITNESS/VICTIM F/REPORTING CRIME	Amended Complaint Filed
Amended: 120: Possess visual pornography of person under age 16, first offense	Amended Complaint Filed
Amended: 121: Possess visual pornography of person under age 16, first offense	Amended Complaint Filed
Amended: 122: Possess visual pornography of person under age 16, first offense	Amended Complaint Filed
Amended: 123: Possess visual pornography of person under age 16, first offense	Amended Complaint Filed
Amended: 124: Possess visual pornography of person under age 16, first offense	Amended Complaint Filed
Amended: 115: Use or permit minor, under age 14, to produce pornography	Amended Complaint Filed
Amended: 116: Possess visual pornography of person under age 16, first offense	Amended Complaint Filed
Amended: 107: Lewdness with child under age 14, first offense	Amended Complaint Filed
Amended: 109: Lewdness with child under age 14, first offense	Amended Complaint Filed
Amended: 108: Lewdness with child under age 14, first offense	Amended Complaint Filed
Amended: 110: Lewdness with child under age 14, first offense	Amended Complaint Filed
Amended: 118: Use or permit minor, age 14 or older, to produce pornography	Amended Complaint Filed
Amended: 119: Possess visual pornography of person under age 16, first offense	Amended Complaint Filed
Amended: 099: Use or permit minor, age 14 or older, to produce pornography	Amended Complaint Filed
Amended: 100: Possess visual pornography of person under age 16, first offense	Amended Complaint Filed
Amended: 104: Possess visual pornography of person under age 16, first offense	Amended Complaint Filed
Amended: 103: Possess visual pornography of person under age 16, first offense	Amended Complaint Filed
Amended: 059: Use or permit minor, age 14 or older, to produce pornography	Amended Complaint Filed
Amended: 069: Use or permit minor, age 14 or older, to produce pornography	Amended Complaint Filed
Amended: 087: Sexual assault against child under 14	Amended Complaint Filed

Amended: 088: Sexual assault against child under 14

Amended: 089: Sexual assault against child under 14

Amended: 090: Lewdness with child under age 14, first offense

Amended: 091: Sexual assault against child under 14

Amended: 092: Lewdness with child under age 14, first offense

Amended: 093: Sexual assault against child under 16

Amended: 094: Sexual assault against child under 16

Amended: 095: Sexual assault against child under 16

Amended: 098: Sexual assault against child under 16

Amended: 052: Sexual assault against child under 16

Amended: 053: Prevent or dissuade victim or other from reporting crime, commencing prosecution or causing arrest

Amended: 101: Sexual assault against child under 16

Amended: 102: Sexual assault against child under 16

Amended: 096: Sexual assault against child under 16

Amended: 080: Sexual assault against child under 16

Amended: 083: Sexual assault against child under 16

001: Conspiracy to commit sexual assault

007: Lewdness with child under age 14, first offense

009: Lewdness with child under age 14, first offense

010: Lewdness with child under age 14, first offense

Amended: 103: Use or permit minor, under age 14, to produce pornography

012: Lewdness with child under age 14, first offense

013: Lewdness with child under age 14, first offense

015: Lewdness with child under age 14, first offense

017: Lewdness with child under age 14, first offense

018: Lewdness with child under age 14, first offense

020: Lewdness with child under age 14, first offense

024: Open or gross lewdness, second or subsequent offense

028: Sexual assault against child under 16

029: Open or gross lewdness, second or subsequent offense

030: Sexual assault against child under 16

031: Sexual assault

033: Sexual assault

034: Open or gross lewdness, second or subsequent offense

035: Sexual assault

036: Sexual assault

037: Incest

038: Sexual assault

Amended Complaint Filed

**Justice Court, Las Vegas Township
Clark County, Nevada**

039: Open or gross lewdness, second or subsequent offense
040: Sexual assault
041: Sexual assault
042: Incest
043: Sexual assault
044: Open or gross lewdness, second or subsequent offense
045: Sexual assault
046: Sexual assault
047: Incest
048: Sexual assault
049: Open or gross lewdness, second or subsequent offense
050: Open or gross lewdness, second or subsequent offense
051: Open or gross lewdness, second or subsequent offense
054: Sexual assault against child under 16
055: Child sexual abuse or exploitation, with substantial bodily or mental harm, child under 14
056: Open or gross lewdness, second or subsequent offense
057: Child sexual abuse or exploitation, with substantial bodily or mental harm, child under 14
058: Open or gross lewdness, second or subsequent offense
060: Possess visual pornography of person under age 16, first offense
061: Sexual assault against child under 16
062: Sexual assault
063: Sexual assault against child under 16
064: Sexual assault
065: Sexual assault against child under 16
066: Sexual assault
067: Sexual assault against child under 16
068: Sexual assault
070: Child sexual abuse or exploitation, with substantial bodily or mental harm, child under 14
073: Incest
075: Incest
076: Sexual assault against child under 16
077: Use or permit minor, under age 14, to produce pornography
078: Possess visual pornography of person under age 16, first offense
079: Sexual assault against child under 16
081: Child sexual abuse or exploitation, with substantial bodily or mental harm, child under 14

**Justice Court, Las Vegas Township
Clark County, Nevada**

084: Child sexual abuse or exploitation, with substantial bodily or mental harm, child under 14

085: Open or gross lewdness, second or subsequent offense

097: Incest

105: Child sexual abuse or exploitation, with substantial bodily or mental harm, child under 14

106: Prevent or dissuade victim or other from reporting crime, commencing prosecution or causing arrest

111: Lewdness with child under age 14, first offense

112: Lewdness with child under age 14, first offense

113: Lewdness with child under age 14, first offense

114: Lewdness with child under age 14, first offense

117: Child sexual abuse or exploitation, with substantial bodily or mental harm, child under 14

Plea/Disp:

001: Consp sex asslt [50131]

Disposition: Bound Over to District Court as Charged (PC Found)

002: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

003: Sex asslt against child < 14 [50105]

Disposition: Bound Over to District Court as Charged (PC Found)

004: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

005: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

006: Sex asslt against child < 14 [50105]

Disposition: Bound Over to District Court as Charged (PC Found)

007: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

008: Sex asslt against child < 14 [50105]

Disposition: Bound Over to District Court as Charged (PC Found)

009: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

010: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

011: Sex asslt against child < 14 [50105]

Disposition: Bound Over to District Court as Charged (PC Found)

**Justice Court, Las Vegas Township
Clark County, Nevada**

012: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

013: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

014: Sex asslt against child < 14 [50105]

Disposition: Bound Over to District Court as Charged (PC Found)

015: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

016: Sex asslt against child < 14 [50105]

Disposition: Bound Over to District Court as Charged (PC Found)

017: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

018: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

019: Sex asslt against child < 14 [50105]

Disposition: Bound Over to District Court as Charged (PC Found)

020: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

021: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

022: Incest [50957]

Disposition: Bound Over to District Court as Charged (PC Found)

023: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

024: Open/gross lewdness, (2+) [50972]

Disposition: Bound Over to District Court as Charged (PC Found)

025: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

026: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

027: Incest [50957]

Disposition: Bound Over to District Court as Charged (PC Found)

028: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

**Justice Court, Las Vegas Township
Clark County, Nevada**

029: Open/gross lewdness, (2+) [50972]

Disposition: Bound Over to District Court as Charged (PC Found)

030: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

031: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

032: Incest [50957]

Disposition: Bound Over to District Court as Charged (PC Found)

033: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

034: Open/gross lewdness, (2+) [50972]

Disposition: Bound Over to District Court as Charged (PC Found)

035: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

036: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

037: Incest [50957]

Disposition: Bound Over to District Court as Charged (PC Found)

038: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

039: Open/gross lewdness, (2+) [50972]

Disposition: Bound Over to District Court as Charged (PC Found)

040: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

041: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

042: Incest [50957]

Disposition: Bound Over to District Court as Charged (PC Found)

043: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

044: Open/gross lewdness, (2+) [50972]

Disposition: Bound Over to District Court as Charged (PC Found)

045: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

Justice Court, Las Vegas Township Clark County, Nevada

046: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

047: Incest [50957]

Disposition: Bound Over to District Court as Charged (PC Found)

048: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

049: Open/gross lewdness, (2+) [50972]

Disposition: Bound Over to District Court as Charged (PC Found)

050: Open/gross lewdness, (2+) [50972]

Disposition: Bound Over to District Court as Charged (PC Found)

051: Open/gross lewdness, (2+) [50972]

Disposition: Bound Over to District Court as Charged (PC Found)

052: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

053: Prevent/dissuade rpt crime/cause pros/arrest [52996]

Disposition: Bound Over to District Court as Charged (PC Found)

054: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

055: Child sex abuse/exploit, w/SBMH, child < 14 [55220]

Disposition: Bound Over to District Court as Charged (PC Found)

056: Open/gross lewdness, (2+) [50972]

Disposition: Bound Over to District Court as Charged (PC Found)

057: Child sex abuse/exploit, w/SBMH, child < 14 [55220]

Disposition: Bound Over to District Court as Charged (PC Found)

058: Open/gross lewdness, (2+) [50972]

Disposition: Bound Over to District Court as Charged (PC Found)

059: Use/permit minor, 14+, to prod porn [50367]

Disposition: Bound Over to District Court as Charged (PC Found)

060: Poss visual porn of pers < 16, (1st) [50374]

Disposition: Bound Over to District Court as Charged (PC Found)

061: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

062: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

**Justice Court, Las Vegas Township
Clark County, Nevada**

063: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

064: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

065: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

066: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

067: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

068: Sex asslt [50095]

Disposition: Bound Over to District Court as Charged (PC Found)

069: Use/permit minor, 14+, to prod porn [50367]

Disposition: Bound Over to District Court as Charged (PC Found)

070: Child sex abuse/exploit, w/SBMH, child < 14 [55220]

Disposition: Bound Over to District Court as Charged (PC Found)

071: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

072: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

073: Incest [50957]

Disposition: Bound Over to District Court as Charged (PC Found)

074: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

075: Incest [50957]

Disposition: Bound Over to District Court as Charged (PC Found)

076: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

077: Use/permit minor, < 14, to prod porn [50368]

Disposition: Bound Over to District Court as Charged (PC Found)

078: Poss visual porn of pers < 16, (1st) [50374]

Disposition: Bound Over to District Court as Charged (PC Found)

079: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

Justice Court, Las Vegas Township Clark County, Nevada

080: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

081: Child sex abuse/exploit, w/SBMH, child < 14 [55220]

Disposition: Bound Over to District Court as Charged (PC Found)

082: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

083: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

084: Child sex abuse/exploit, w/SBMH, child < 14 [55220]

Disposition: Bound Over to District Court as Charged (PC Found)

085: Open/gross lewdness, (2+) [50972]

Disposition: Bound Over to District Court as Charged (PC Found)

086: PREVENT/DISUADE WITNESS/VICTIM F/REPORTING CRIME

Disposition: Bound Over to District Court as Charged (PC Found)

087: Sex asslt against child < 14 [50105]

Disposition: Bound Over to District Court as Charged (PC Found)

088: Sex asslt against child < 14 [50105]

Disposition: Bound Over to District Court as Charged (PC Found)

089: Sex asslt against child < 14 [50105]

Disposition: Bound Over to District Court as Charged (PC Found)

090: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

091: Sex asslt against child < 14 [50105]

Disposition: Bound Over to District Court as Charged (PC Found)

092: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

093: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

094: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

095: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

096: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

Justice Court, Las Vegas Township Clark County, Nevada

097: Incest [50957]

Disposition: Bound Over to District Court as Charged (PC Found)

098: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

099: Use/permit minor, 14+, to prod porn [50367]

Disposition: Bound Over to District Court as Charged (PC Found)

100: Poss visual porn of pers < 16, (1st) [50374]

Disposition: Bound Over to District Court as Charged (PC Found)

101: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

102: Sex asslt against child < 16 [50106]

Disposition: Bound Over to District Court as Charged (PC Found)

103: Use/permit minor, < 14, to prod porn [50368]

Disposition: Bound Over to District Court as Charged (PC Found)

104: Poss visual porn of pers < 16, (1st) [50374]

Disposition: Bound Over to District Court as Charged (PC Found)

105: Child sex abuse/exploit, w/SBMH, child < 14 [55220]

Disposition: Bound Over to District Court as Charged (PC Found)

106: Prevent/dissuade rpt crime/cause pros/arrest [52996]

Disposition: Bound Over to District Court as Charged (PC Found)

107: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

108: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

109: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

110: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

111: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

112: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

113: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

Justice Court, Las Vegas Township Clark County, Nevada

114: Lewdness w/child < 14, (1st) [50975]

Disposition: Bound Over to District Court as Charged (PC Found)

115: Use/permit minor, < 14, to prod porn [50368]

Disposition: Bound Over to District Court as Charged (PC Found)

116: Poss visual porn of pers < 16, (1st) [50374]

Disposition: Bound Over to District Court as Charged (PC Found)

117: Child sex abuse/exploit, w/SBMH, child < 14 [55220]

Disposition: Bound Over to District Court as Charged (PC Found)

118: Use/permit minor, 14+, to prod porn [50367]

Disposition: Bound Over to District Court as Charged (PC Found)

119: Poss visual porn of pers < 16, (1st) [50374]

Disposition: Bound Over to District Court as Charged (PC Found)

120: Poss visual porn of pers < 16, (1st) [50374]

Disposition: Bound Over to District Court as Charged (PC Found)

121: Poss visual porn of pers < 16, (1st) [50374]

Disposition: Bound Over to District Court as Charged (PC Found)

122: Poss visual porn of pers < 16, (1st) [50374]

Disposition: Bound Over to District Court as Charged (PC Found)

123: Poss visual porn of pers < 16, (1st) [50374]

Disposition: Bound Over to District Court as Charged (PC Found)

124: Poss visual porn of pers < 16, (1st) [50374]

Disposition: Bound Over to District Court as Charged (PC Found)

1 **SAO**
2 STEVEN B. WOLFSON
3 Clark County District Attorney
4 Nevada Bar #001565
5 MARY KAY HOLTHUS
6 Chief Deputy District Attorney
7 Nevada Bar #003814
8 200 Lewis Avenue
9 Las Vegas, Nevada 89155-2212
10 (702) 671-2500
11 Attorney for Plaintiff

FILED IN OPEN COURT
2-19-15
CLARK

7 **JUSTICE COURT, LAS VEGAS TOWNSHIP**
8 **CLARK COUNTY, NEVADA**

10 THE STATE OF NEVADA,
11 Plaintiff,
12 -vs-
13 CHRISTOPHER SENA,
14 #0779849
15 Defendant.

CASE NO. 14F14785X
DEPT NO. 3

16 **STIPULATION AND ORDER REGARDING DISCOVERY OF**
17 **CHILD PORNOGRAPHIC MATERIALS**

18
19 Having come to the attention of the State that images exist deemed as Child
20 Pornography, as well as pornographic images of the victim named in the Criminal Complaint,
21 it is hereby stipulated and agreed to by both parties that in accordance with the Nevada
22 Supreme Court ruling in State v. Second Judicial District Court, 120 Nev. 254 (2004), Defense
23 Counsel must adhere to the following strict limitations regarding their copy of said images:

- 24 1. Defendant cannot possess a copy of said images; however, Defendant
25 may view them with counsel in preparing defense;
26 2. Defense Counsel cannot make additional copies of said images;
27 3. Only attorneys, legal staff, Defendant, an audio/video technician and
28 expert witnesses may view said images;
4. Attorney(s) must keep said images safe at their place of business;

14F14785X
ORD
Order
4763468



W:\2014F\14785\14F14785-SAO-(SENA_CHRISTOPHER)-001.DOCX

5. No one may mail or transport said images by any third-party commercial carriers;
6. No one may transport said images across state lines without a written court order;
7. The audio/video technician may make enhanced copies of specific portions of said images for trial purposes, but shall not retain a copy for any reason;
8. After trial, at the conclusion of the case, or if Defense Counsel withdraws as attorney of record at any point during the life of the case, Defense Counsel must promptly return their copy of said images directly to the Prosecutor, who will destroy it.

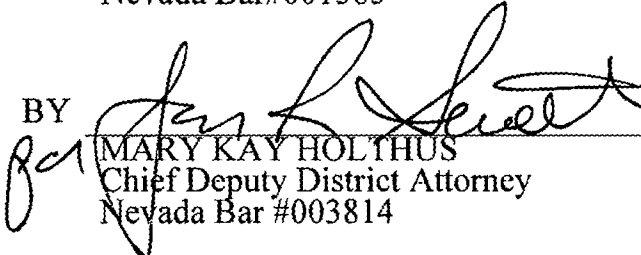
DATED this 19 day of February, 2015.

DATED this 19 day of February, 2015.


STEVEN B. WOLFSON
DISTRICT ATTORNEY
Nevada Bar#001565

ATTORNEY FOR DEFENDANT

BY


MARY KAY HOLTHUS
Chief Deputy District Attorney
Nevada Bar #003814

BY


VIOLET RADOSTA
Deputy Public Defender
Nevada Bar #005747

SO ORDERED.

DATED this 19 day of February, 2015.



JUSTICE OF THE PEACE

hjc/SVU

1 JUSTICE COURT
2 CLARK COUNTY, NEVADA

3 THE STATE OF NEVADA)

4 Plaintiff,)

5 vs.)

Case No. 14F14785X

Dept No. 3

6 CHRISTOPHER SENA,)

7 Defendant.)
8)
9)

10 **ORDER**

11 Having come before the Court an Ex Parte Application of the above-named Defendant,
12 CHRISTOPHER SENA, by and through VIOLET RADOSTA, Deputy Public Defender, for JAVS
13 recordings from the preliminary hearing of the proceedings for case 14F19170X, State of Nevada v
14 DEBORAH SENA on February 17, 2015, February 18, 2015 and February 19, 2015 in Justice Court
15 Department 4,

16 **IT IS HEREBY ORDERED** that this matter is set for hearing on the 19 day of
17 March, 2015 at 8:30 A.M. in Department 3.

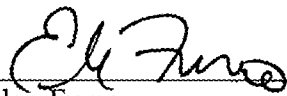
18 DATED this 16th day of March, 2015.

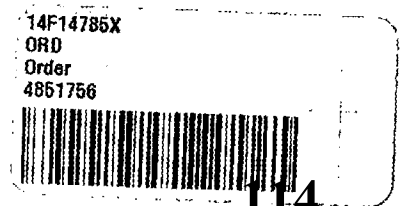
19 
20 JUDGE JANIECE MARSHALL

21 I hereby certify that on the date filed, I faxed a copy to, or placed a copy in the attorney
22 folder of the following parties;

23 Violet Radosta, Deputy Public Defender

24 Mary Kay Holthus, Chief Deputy District Attorney

25 
26 Ellen Fumo
27 Judicial Executive Assistant
28



ORIGINAL

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
JAMES R. SWEETIN
Chief Deputy District Attorney
Nevada Bar #005144
200 Lewis Avenue
Las Vegas, Nevada 89155-2212
(702) 671-2500
Attorney for Plaintiff

FILED

2015 JUL 10 P 8:58

JUSTICE COURT
LAS VEGAS, NEVADA

IA

JUSTICE COURT, LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,
Plaintiff,

-vs-

CHRISTOPHER SENA,
#0779849

Defendant.

CASE NO: 14F14785X

DEPT NO: 3

14F14785X
OPIN

Order for Production of Inmate
5271711



ORDER FOR PRODUCTION OF INMATE

TERRIE SENA, BAC #1141092

DATE OF HEARING: JULY 13, 2015

TIME OF HEARING: 11:00 A.M.

TO: CAROLYN MYLES, Warden, Florence McClure Women's Correctional Center;


TO: JOE LOMBARDO, Sheriff of Clark County, Nevada

Upon the ex parte application of THE STATE OF NEVADA, Plaintiff, by STEVEN B. WOLFSON, Clark County District Attorney, through JAMES R. SWEETIN, Chief Deputy District Attorney, and good cause appearing therefor,

IT IS HEREBY ORDERED that CAROLYN MYLES, Warden of Florence McClure Women's Correctional Center shall be, and is, hereby directed to produce TERRIE SENA, in Case Number 14F14785X, on a charge wherein THE STATE OF NEVADA is the Plaintiff, inasmuch as the said TERRIE SENA is currently incarcerated in the Florence McClure Correctional Center located in North Las Vegas, Nevada and her presence will be required in Las Vegas, Nevada commencing on JULY 13, 2015, at the hour of 11:00 o'clock A.M. and continuing until completion of the prosecution's case against the said Defendant.

1 **IT IS FURTHER ORDERED** that JOE LOMBARDO, Sheriff of Clark County,
2 Nevada, shall accept and retain custody of the said TERRIE SENA in the Clark County
3 Detention Center, Las Vegas, Nevada, pending completion of said matter in Clark County, or
4 until the further Order of this Court; or in the alternative shall make all arrangements for the
5 transportation of the said to and from the Nevada State Prison facility which are necessary to
6 insure the TERRIE SENA's appearance in Clark County pending completion of said matter,
7 or until further Order of this Court.

8 DATED this 10th day of July, 2015.

9
10 
11 JUSTICE OF THE PEACE

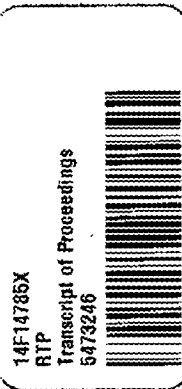
12 STEVEN B. WOLFSON
13 Clark County District Attorney
14 Nevada Bar #001565

15 BY 

16 JAMES R. SWEETIN
17 Chief Deputy District Attorney
18 Nevada Bar #005144
19
20
21
22
23
24
25
26
27

28 hjc/SVU

1
2 Tran
CASE NO. 14F14785X
3
4 IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP
COUNTY OF CLARK, STATE OF NEVADA
5
6 STATE OF NEVADA,)
7 Plaintiff,)
8 vs.) Case No. 14F14785X
9 CHRISTOPHER SENA,)
10 Defendant.)
11
12 REPORTER'S TRANSCRIPT
13 OF
14 MOTIONS
15
16 BEFORE THE HON. JANIECKE MARSHALL
JUSTICE OF THE PEACE
17
18 MONDAY, JULY 13, 2015
11:07 a.m.
19
20 APPEARANCES:
21 For the State: MARY KAY HOLTHUS, ESQ.
JAMES SWEETIN, ESQ.
Chief Deputies District
Attorney
22
23 For the Defendant: VIOLET RADOSTA, ESQ.
Deputy Public Defender
24
25 Reported by: CHERYL GARDNER, RMR-RPR
CCR No. 230

ORIGINAL

1 is present in custody, bar No. 5747.
2 THE COURT: Okay. Mr. Sweetin, do you
3 have an amended Complaint you are going to file?
4 MR. SWEETIN: We do, Judge.
5 THE COURT: Did you receive a copy of
6 it?
7 MS. RADOSTA: I did just receive a
8 copy of it right now, Your Honor. I -- at this
9 point in time I'm caught between a rock and a hard
10 place here. We are ready to go forward on the
11 Complaint.
12 THE COURT: I'm sorry. We don't have
13 it.
14 MS. RADOSTA: Sorry.
15 THE COURT: Do you have a file stamped
16 copy?
17 MS. RADOSTA: I do not have a file
18 stamped copy.
19 THE COURT: We'll give you one. I now
20 have the fourth amended criminal Complaint. The
21 last one I had was the second.
22 MS. RADOSTA: There was a third that
23 was given to me about three weeks ago that had
24 merely a typographical change on one of the counts.
25 THE COURT: So there was a third

1 LAS VEGAS, CLARK COUNTY, NV, MONDAY, JULY 13, 2015
11:07 a.m.
2
3 -oOo-
4 THE COURT: Good morning. Are you
5 ready to go?
6 MS. RADOSTA: We're almost ready.
7 MS. HOLTHUS: We're almost ready,
8 Judge. Over the weekend we did some amendments to
9 the Complaint. I don't know if that changes
10 anything, and they're in the process of typing it
11 up because there was a lot of them.
12 Well, my expectation is after
13 testimony today there still may be other amendments
14 because we're talking about a lot of people and a
15 long period of time so my notes --
16 THE COURT: So can we start with the
17 witnesses? No?
18 MS. RADOSTA: No, Your Honor. What
19 Ms. Holthus just said --
20 THE COURT: All right. Let me call
21 the case before we go further on the record.
22 Christopher Sena, 14F14785X. And --
23 MS. HOLTHUS: Mary Kay Holthus for the
24 State, bar No. 3814.
25 MS. RADOSTA: Violet Radosta from the
public defender's office on behalf of Mr. Sena who

1 amended but it hadn't been filed.
2 MR. SWEETIN: I thought it had been
3 filed. It's our error.
4 THE COURT: Let me check and see.
5 (Sotto voce remarks between
6 Ms. Radosta and Mr. Sweetin.)
7 THE COURT: I'm checking to see
8 because it may not have made it through the
9 electronic system yet. So this would be the third
10 amended. So you're objecting to it being filed.
11 MS. RADOSTA: Yes, Your Honor, the
12 second amended criminal Complaint contains
13 counts. This contains 96. This is not minor
14 changes to the State's case. It's almost doubled
15 the amount of charges that my client is now
16 facing.
17 I don't honestly even have the time
18 before we would start calling witnesses to work my
19 way through this document to see what the
20 substantial changes are, but the adding of 39
21 counts to be exact is clearly a substantial change
22 to the State's case so if the State wants to
23 proceed on the second amended and stick with
24 approximately 57 counts, then that's what we would
25 ask them to do.

1 If they want to file this amended,
2 then we're going to have to be asking for a
3 continuance of preliminary hearing.
4 Additionally, Your Honor, just so the
5 Court is aware, I was introduced just a moment ago
6 to the potential witnesses that the State's
7 intending to call. There was a witness out there
8 that has not been named ever before in the case
9 against my client.

10 He was named in the case against
11 Deborah Sena, but he was not a potential witness
12 against my client so I'm anticipating now that I've
13 been handed this document and that he's outside
14 that there's an additional entirely new alleged
15 victim that I was not made aware of prior to this
16 morning.

17 THE COURT: All right. So with
18 respect to the, what I now designated as the third
19 amended criminal Complaint, how many -- is there
20 additional something that hasn't previously been
21 disclosed?

22 MS. HOLTHUS: We have no additional
23 discovery. Mr. Sweetin sat down with the document
24 over the weekend. The last prelim against Deborah
25 Sena we ended up getting a transcript at the

1 always been known?

2 MS. RADOSTA: Really quickly looking
3 through, Judge, I notice that the witness that is
4 out there that was never previously mentioned
5 there's 17 additional counts all of them carrying
6 life sentences for that one new alleged victim.

7 THE COURT: So --

8 MS. RADOSTA: That's 17.

9 THE COURT: Put that one aside. What
10 about the bulk of the allegations?

11 MS. RADOSTA: The other 20 additional
12 counts I couldn't even tell you flipping through
13 this really quickly where the changes have been
14 made.

15 THE COURT: Does the State know which
16 additional counts? So the witness that you just
17 learned of this morning --

18 MS. RADOSTA: The initials TS.

19 THE COURT: TS and you're saying that
20 you had no information about TS.

21 MS. RADOSTA: He was never a charged
22 witness. Did I have information that he was in the
23 household at the time, yeah, but he was never a
24 named witness against my client so I have not
25 reviewed his testimony. I haven't prepared

1 conclusion of the preliminary hearing and going
2 back and doing the Complaint according to the
3 testimony.

4 The reality is this is something that
5 happened to a number of victims over a number of
6 years and there has been -- one of the victims
7 initially when he was contacted by the police
8 denied there was any sexual conduct. It's not
9 until he realizes there are videos when he said,
10 okay, now I remember or whatever, but the discovery
11 has never changed.

12 Nothing, all the statements were
13 made. It's strictly a different way of pleading
14 it, and I suspect that when we put the witness on
15 today, it will be somewhat different as well so my
16 proposal would be we get the testimony. I don't
17 see where the amended Complaint varies tremendously
18 on her cross-examination.

19 We can always leave it open too if she
20 feels like she needs to have someone subject to
21 recall because she feels like she needs to be more
22 -- I mean we're fine with that. This is extremely
23 traumatic for all of these kids. Nobody's slept so
24 far. This is dad.

25 THE COURT: Which alleged victims have

1 cross-examination for him.

2 THE COURT: I'm sure we are not going
3 to get to him.

4 MS. HOLTHUS: Judge, with all due
5 respect she's had the video in this case that shows
6 that victim in the hallway participating in sexual
7 acts with one of the moms and with her client so
8 none of this is news.

9 MS. RADOSTA: But if the State isn't
10 charging it, then I don't -- that's their job to
11 charge and, by the way, this has been going on for
12 ten months. My client has been in custody since
13 September and the State moves on the morning of the
14 preliminary hearing to add 40 extra counts and then
15 says. I should have been prepared for this. I
16 should have known all of this stuff was going to
17 happen.

18 I prepared based on what the State has
19 previously provided to me. I contacted them last
20 week and said by the way, there's certain things
21 discovery-wise you haven't provided.

22 THE COURT: What hasn't been
23 provided?

24 MS. RADOSTA: There are potentially
25 still photographs with one of the alleged victims

Page 9

Page 11

1 MC and also videos allegedly with MC that were
2 never provided to me and I e-mailed the State about
3 that on Friday.

4 THE COURT: Are there any stills or
5 videos with alleged victim MC that haven't been
6 disclosed?

7 MR. SWEETIN: There are no videos.
8 The State received late Friday afternoon actually
9 after 5:00 o'clock a disk that contains some
10 stills, and those stills do include some stills
11 related to MC.

12 THE COURT: Okay.

13 MS. RADOSTA: So additionally that's a
14 somewhat separate issue, Judge.

15 THE COURT: But that's not a discovery
16 violation. If they only got it on Friday, they
17 only got it on Friday.

18 MS. RADOSTA: But they are to produce
19 any and all discovery five days prior to
20 preliminary hearing that they intend to use during
21 the course of preliminary hearing so then at this
22 point --

23 THE COURT: I don't know if they're
24 going to use it or not. They haven't said if
25 they're going to use it or not. So let me ask

1 It's completely different. And I've
2 been preparing for this preliminary hearing on and
3 on for the last two or three weeks based on the
4 documents they have previously given me so now all
5 of that preparation, all of those
6 cross-examinations that I prepared are pretty much
7 useless because the theory is changed.

8 MS. HOLTHUS: We are going to use the
9 photographs so we're ready but we don't think
10 there's any additional discovery.

11 THE COURT: If you haven't produced
12 documents then that you intend to rely upon at
13 preliminary hearing, then we have no choice.

14 What about the additional counts?

15 MR. SWEETIN: Well, in regards to the
16 pleading, the way that the pleading is structured
17 currently is to align all charges related to
18 individual victims all together so there was some
19 restructuring in regards to moving around to make
20 it a little bit more simple.

21 There are some charges that have been
22 Barren pled or pled to include liability, vicarious
23 liability so that has been added to some counts,
24 but in essence most of it events that occurred were
25 pled out in the original charging document.

Page 10

Page 12

1 you. Are we prepared to go forward with some
2 witnesses today?

3 MS. RADOSTA: I couldn't honestly say
4 that, Judge. I don't know how this document has
5 changed with any of the alleged victims. It's
6 entirely possible, Judge, that they changed
7 theories and I'm seeing now as a matter of fact
8 they have.

9 They're now alleging a lot of aiding
10 and abetting involving AS which is one of the other
11 witnesses where they've never alleged aiding and
12 abetting theories previously. It was always direct
13 liability.

14 The only witness previously where any
15 aiding and abetting language was used was with RS.
16 Now I'm seeing it with regard to AS which is a
17 whole new theory and multiple counts of that and
18 additionally aiding and abetting theories involving
19 Deborah Sena and Terrie Sena.

20 So it's not just -- it's entirely
21 different, Judge. This is just me flipping through
22 it as we stand here. I cannot -- if the Court is
23 going to allow the State to file this amended
24 Complaint, I cannot be ready to go forward with
25 this preliminary hearing today.

1 They've been ferreted out a bit more
2 in the amended and there have been some additional
3 charges like dissuading witness as we talked to our
4 witnesses and so forth that have come out and been
5 added so there have been some changes in regard to
6 that but for the most part in the original charging
7 document are the same events we have in the current
8 charging document. They're just more specific,
9 more narrowed down.

10 THE COURT: Here's what we're going to
11 do. We're going to give counsel an opportunity to
12 at least read the amended Complaint today. If you
13 think that you can go forward with respect to the
14 core of the allegations which that part hasn't
15 changed -- I know there may be some changes on the
16 fringe part of it that will affect different
17 victims, different charges, but there may be some
18 core of it that you can still proceed going forward
19 today.

20 Do you want to take an hour and review
21 the amended Complaint? What do you want to do?

22 MS. RADOSTA: I would like to continue
23 the preliminary hearing, Judge. I'm looking
24 through almost every single -- I appreciate what
25 the State is saying. Almost every single count is

1 now alleged conspiracy or aiding and abetting from
2 the charges of -- using porn is now charged. It
3 was a direct liability crime. Under the age of 14
4 now has aiding and abetting theories.

5 At this point, Judge, open and gross
6 lewdness now charged under an aiding and abetting
7 theory. I don't think there was an open and gross
8 lewdness charge before ever. As far as I can tell
9 every single part of this case has been charged
10 from ages on charges to, I mean open and gross
11 lewdness sometimes previously is a lewdness with a
12 child under the age of 14 but now it's an open and
13 gross lewdness.

14 I don't know if they're talking about
15 a completely different incident or if they decided
16 that certain incidents happened when somebody was
17 over the age of 14. There's no way for me to just
18 go, oh, here's the change. There's multiple
19 changes, Judge. At the very least I would ask for
20 at least two or three weeks.

21 THE COURT: Okay. Well, does the
22 State want to go forward with the amended
23 Complaint? Then we're going to have to continue
24 this to give her an opportunity to be prepared. I
25 appreciate the fact that the structuring -- but if

1 there's additional witnesses or alleged victims
2 named plus additional counts, she has the right to
3 be fully prepared.

4 If you have additional photographs,
5 videos that haven't been produced that you're
6 intending to rely upon at the preliminary hearing
7 so that we don't continue this out any further. So
8 I'm assuming that you wanted to go forward with
9 your third amended Complaint.

10 MR. SWEETIN: That's correct.

11 THE COURT: So you have no objection
12 to a continuance.

13 MR. SWEETIN: That's correct.

14 THE COURT: So today is the 13th and
15 the 14th. The 15 days takes it to the 27th. What
16 about -- can we do the 28th and 29th?

17 MS. RADOSTA: Could we possibly --
18 Your Honor, could we possibly do three. I
19 currently have two trials the week of the 27th. I
20 don't have any the following week so I would rather
21 not have to move jury trials.

22 THE COURT: I understand. So the week
23 of August the 3rd.

24 MR. SWEETIN: That would work better
25 for me as well.

1 THE COURT: All right. So we're
2 looking at August 4th and 5th.

3 MS. RADOSTA: That's a Tuesday and
4 Wednesday.

5 THE COURT: Right.

6 MS. RADOSTA: I don't have -- yeah,
7 any day of that week I can work around. Like I
8 said, any day those weeks I can move things around.

9 THE COURT: So the 6th and the 7th,
10 Thursday and Friday. All right so we're going to
11 continue it to August 6th and 7th so we can start
12 at 10:30.

13 MS. RADOSTA: I can do 10:00.

14 THE COURT: Okay. 10:00 o'clock. So
15 August 6th and August 7th. Mr. Sena, you're
16 agreeing to continue your preliminary hearing so
17 that your counsel --

18 THE DEFENDANT: Yes, ma'am.

19 THE COURT: All right. So we'll
20 continue this to August 6th and 7th. Now, if we
21 have a third amended, are you going to make any
22 more changes to this amended Complaint that counsel
23 needs, and if you're making any more changes, you
24 need to get it to her no later than the end of
25 three weeks.

1 MS. RADOSTA: Was it actually filed?

2 THE COURT: It was a proposed file but
3 they have to change it anyway because it's not a
4 fourth. It will be a third so they have to change
5 that so then I'm assuming you're going to want to
6 discuss it. Whatever version that you're going
7 with just get it to the defense no later than the
8 end of this week and then any photographs, any
9 videos that you may have, check and make sure you
10 have everything.

11 If there's something that you don't,
12 do you want a status check before to make sure you
13 have everything and you're ready to go before
14 August 6th and 7th?

15 MS. RADOSTA: Yeah. I guess maybe one
16 week prior.

17 THE COURT: July 30th.

18 MS. RADOSTA: Whatever the Thursday
19 is.

20 THE COURT: The 30th. July 30th.

21 MS. HOLTHUS: We're blocked out at
22 this point. If Ms. Radosta wanted to come back to
23 the office, we can show her everything that we have
24 right now.

25 THE COURT: That would be great.

Page 17

Page 19

1 MS. HOLTHUS: And work out --
 2 additionally the additional victim that she's
 3 claiming that I would have thought was pled. I
 4 know we pled it in Deborah Sena's case and I know
 5 defense has a copy of that preliminary hearing
 6 transcript so the testimony by that added victim,
 7 she does have full testimony of.

8 MS. RADOSTA: It's just -- I mean I
 9 was aware that he testified in Deborah's but he
 10 wasn't charged in my case.

11 MS. HOLTHUS: I'm just making an
 12 argument. I'm not arguing any more.

13 THE COURT: All right. We will do a
 14 status check on July 30th. Do you want it at 10:00
 15 o'clock or 8:30?

16 MS. RADOSTA: 8:30 is fine with me.

17 THE COURT: July 30th at 8:30 for a
 18 status check. If you don't have any problems if
 19 you're ready to go on August 6th, then just let us
 20 know. If there's any issues, then make sure you're
 21 here and be sure to address.

22 So you're going to go with them now
 23 and look at photos and videos and if there's a
 24 problem, we will have that ready. We will give you
 25 back the proposed amended Complaint so we will just

Page 18

1 give it back at this time. Anything further?

2 MR. SWEETIN: I don't believe so,
 3 Judge.

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

AFFIRMATION

Pursuant to NRS 239B.030:

The undersigned does hereby affirm
 that the preceding transcript of motion Justice
 Court Case No. 14F14785X does not contain the
 social security number of any person.

Dated this 31st day of August, 2015.

/s/ Cheryl Gardner, CCR 230, RPR, RMR

Page 20

REPORTER'S CERTIFICATE

State of Nevada)
) ss
 County of Clark)

I, Cheryl Gardner, CCR 230, RPR, RMR,
 do hereby certify that I took down in Stenotype
 all of the proceedings had in the before-entitled
 matter at the time and place indicated and that
 thereafter said shorthand notes were transcribed
 into typewriting by me and that the foregoing
 transcript constitutes a full, true, and accurate
 record of the proceedings had to the best of my
 ability.

IN WITNESS WHEREOF, I have hereunto
 set my hand and affixed my signature in the County
 of Clark, State of Nevada this 31st day of August,
 2015.

/s/ Cheryl Gardner, CCR 230, RPR, RMR

1

2 Tran
CASE NO. C-15-311453-1

3

IN THE JUSTICE COURT OF LAS VEGAS TOWNSHIP
COUNTY OF CLARK, STATE OF NEVADA

4

5

-oOo-

6 STATE OF NEVADA,

7 Plaintiff,

8 vs.

9 CHRISTOPHER SENA,

10 Defendant.

11

12

VOLUME I

13

REPORTER'S TRANSCRIPT

14

OF PRELIMINARY HEARING

15

BEFORE THE HON. JANIECE MARSHALL
JUSTICE OF THE PEACE

16

THURSDAY, AUGUST 27, 2015

17

10:22 a.m.

18 APPEARANCES:

19

For the State: JAMES SWEETIN, ESQ.
MARY KAY HOLTHUS, ESQ.
Chief Deputies District
Attorney

21

For the Defendant: VIOLET R. RADOSTA, ESQ.
DAVID LOPEZ-NEGRETE, ESQ.
Deputies Public Defender

23

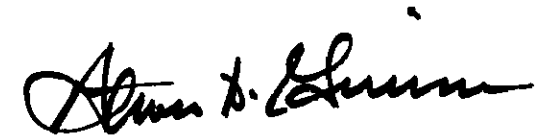
For Terrie Sena: DUSTIN R. MARCELLO, ESQ.

24

Reported by: CHERYL GARDNER, RMR-RPR
CCR No. 230

25

CHERYL GARDNER, RPR-RMR, CCR 230



CLERK OF THE COURT

1 I N D E X

2 STATE'S WITNESSES PAGE

3 TERRIE SENA

4 Direct Examination by Mr. Sweetin 12

5 Cross-Examination by Ms. Radosta 54

6 Redirect Examination by Mr. Sweetin 123

7 Recross-Examination by Ms. Radosta 126

8 MELISSA CLARK

9 Direct Examination by Ms. Holthus 135

10 Cross-Examination by Mr. Lopez-Negrete 151

11 Redirect Examination by Ms. Holthus 181

12 WILLIAM KURAU

13 Direct Examination by Mr. Sweetin 191

14 Cross-Examination by Ms. Radosta 195

15 VINCENTE RAMIREZ

16 Direct Examination by Mr. Sweetin 211

17

18

19

20

21

22

23

24

25

1 LAS VEGAS, CLARK COUNTY, NV, THURS., AUG. 27, 2015
10:22 a.m.

2 -oOo-

3 THE COURT: Christopher Sena, 14F14785X.

4 MR. SWEETIN: Judge, I'm filing a third
5 amended Complaint in this matter. I'm not sure, has
6 the case been called?

7 THE COURT: Yes. I can call it again,
8 Christopher Sena? Is it Seena (phonetic) or Sena?

9 THE DEFENDANT: Sena.

10 THE COURT: Thanks. 14F14785X. So I have
11 a third amended Complaint that's being filed in open
12 court. Did you receive a copy of the third amended
13 Complaint?

14 MS. RADOSTA: Well, I received a copy of
15 the one that I thought was previously filed the last
16 time we were in court so I'm confused now.

17 MR. SWEETIN: Well, if I can. If the Court
18 might recall, the third amended Complaint I think the
19 Court gave it back to us.

20 THE COURT: Right.

21 MR. SWEETIN: Because there were some
22 issues with it. We amended that and we provided a
23 copy of that to the Court and to Ms. Radosta. Since
24 that amendment I found a couple typos, Ms. Radosta
25 also found a typo, and we corrected that in the third

1 amended Complaint.

2 THE COURT: So do you know those specific
3 corrections that she -- there's no additional
4 charges.

5 MS. RADOSTA: There's additional charges.

6 THE COURT: Oh, there are? But from the
7 one that we had last time.

8 MR. SWEETIN: Yes.

9 THE COURT: There's more than there was in
10 the third amended?

11 MR. SWEETIN: The only additional charges
12 relate to I believe there was seven counts of
13 possession of child pornography relating to one of
14 the victims. I had an opportunity to talk to the
15 victim and determine exactly which photos related to
16 her at certain times of life, certain ages.

17 Based upon that, I amended those charges to
18 reflect just those, some of those offenses or photos
19 where she was in the applicable age of under 16. I
20 alerted Ms. Radosta to this yesterday afternoon, gave
21 her exactly which photos we would be using.

22 THE COURT: So you went through all the
23 photos before. I remember we arranged that.

24 MR. RADOSTA: Yes.

25 THE COURT: You guys were going up to the

1 office and looking at all the photos. So that
2 happened.

3 MS. RADOSTA: Yes, that happened, Your
4 Honor.

5 THE COURT: Now, the third amended
6 Complaint, which counts specifically are we talking
7 about that have been added or changed?

8 MS. RADOSTA: My understanding is, Your
9 Honor, is that right now we have 96 counts. There
10 are now a hundred counts. That's my understanding.

11 MR. SWEETIN: That's correct. They all
12 relate to changes in counts from 91 now that would
13 relate to the child pornography charges. There are
14 some typos in counts previous to that. They're not
15 necessarily changes of substance other than some, one
16 of the counts I believe indicated under the age of
17 14. It should have been under the age of 16.

18 There was a typo, a word was spelled
19 wrong. There was a number of other typos of that
20 sort so the major changes have been made in regards
21 to Counts 91 on, and that's just the addition of a
22 few additional counts.

23 The photos which Ms. Radosta had in total
24 we'd like to use just certain of those photos and I
25 alerted Ms. Radosta exactly which ones we'd be using

1 last night.

2 MS. RADOSTA: Your Honor, I mean it just
3 never ends. He did alert me yesterday about 4:00
4 o'clock in the afternoon that they would once again
5 be adding additional counts. I would ask that the
6 State not be allowed to add those counts.

7 They've had the opportunity multiple times
8 to do this more than 24 hours prior to the
9 preliminary hearing. And trust me, Your Honor, if we
10 were not ready to go forward today, there would be a
11 fourth amended with more charges. It just keeps
12 happening.

13 THE COURT: I guess we better go forward
14 today then.

15 MS. RADOSTA: Your Honor --

16 THE COURT: Let me ask you before we get
17 into any more, which specific counts are you talking
18 about? Call them out.

19 MS. RADOSTA: I have not received a copy of
20 the newest. I have a third amended handed to me from
21 the State last time which has 96 counts.

22 THE COURT: So the one that I currently
23 have has a hundred counts so then would you be
24 talking -- there would be 97, 98, 99, and 100 are
25 additional counts and those are all for possession of

1 visual presentation depicting sexual conduct of a
2 child.

3 MS. RADOSTA: To be honest I'm not sure if
4 97 through a hundred are simply added or if 91 on
5 have been because they're all the same charge.

6 THE COURT: But different pictures and you
7 received all the pictures.

8 MS. RADOSTA: Yes, I did receive all the
9 pictures.

10 THE COURT: We're going to start and we'll
11 argue about it after the witnesses testify if you
12 need additional time with respect to any additional
13 charges, but if it's all related to the photos and
14 you were given all the photos, you were obviously
15 prepared for this issue and this charge, additional
16 charges of the same nature.

17 MS. RADOSTA: So I can make a record, Your
18 Honor, it's not a matter of being prepared. It's a
19 matter of at some point in time I have to be able to
20 rely on the document that's being presented to me,
21 and it just keeps changing. At this point in time
22 the reason the State continues to add charges at the
23 last minute is because there's never a penalty.
24 Every single courtroom, not just this one.

25 THE COURT: I haven't allowed it yet.

1 We're going to start and once we start going and you
2 have an objection based on something, we'll go from
3 there?

4 MS. RADOSTA: So the fact that it's filed
5 does not necessarily mean --

6 THE COURT: It's proposed at this point.
7 They didn't even give you a copy of it.

8 MS. RADOSTA: I have it.

9 THE COURT: We're going to start 'cause we
10 have witnesses, then we're going to go and we'll
11 argue about it. We have two days scheduled for this
12 so you have plenty of time. All your rights are
13 reserved. So we're ready to go.

14 Anything else that we need to discuss?

15 What order are the witnesses?

16 How are we proceeding?

17 Do you know about how long today before we
18 want the first break?

19 Did you discuss --

20 MR. SWEETIN: We didn't discuss this.

21 We're expecting to call Terrie Sena first. I would
22 expect that she's probably going to take from the
23 State somewhere in the neighborhood of 30 to 45
24 minutes. I'm not sure what the process is going to
25 be.

1 Subsequent to that we're going to call the
2 detective who went out and served the search warrant
3 and also the detective who did the analysis on the
4 computer equipment. I would expect cumulatively
5 those two are going to take I believe on direct
6 somewhere between an hour to 90 minutes and then we
7 will get into the particular witnesses. So that's
8 going to -- so between this witness and that just on
9 direct I'm looking at a couple hours probably.

10 THE COURT: Okay.

11 MR. MARCELLO: I want to put on the record
12 the motion to withdraw. Your Honor, if I may be
13 heard real quick. Ms. Sena had entered a plea
14 agreement.

15 THE COURT: Do you want to put your name on
16 the record.

17 MR. MARCELLO: I apologize. Dustin
18 Marcello appearing for Mr. Thomas Pitaro on behalf of
19 Terrie Sena. Part of her agreement was to testify at
20 these proceedings. She has since filed a motion
21 requesting us to withdraw from the case. That motion
22 is still pending in district court, and she is here
23 today and --

24 THE COURT: So you're still counsel of
25 record for her.

1 MR. MARCELLO: We are still counsel of
2 record at this point.

3 THE COURT: So you're remaining during her
4 testimony.

5 MR. MARCELLO: We are going to be here
6 during her testimony. I did speak to her before.
7 She said she would testify today. I just want to
8 make the Court aware there is a pending motion to
9 withdraw as counsel and she has requested we withdraw
10 from representing her.

11 THE COURT: But that's in front of district
12 court so you're still counsel of record.

13 MR. MARCELLO: Correct.

14 THE COURT: So do you want to be here when
15 she testifies?

16 MR. MARCELLO: I don't think I have to be
17 up there with her unless she has a question.

18 THE COURT: If something comes up, you're
19 going to remain in the courtroom.

20 MR. MARCELLO: Yes, I'll be here.

21 THE COURT: Okay. Are we ready to start?

22 MR. SWEETIN: Yes, Judge.

23 THE COURT: All right.

24 MR. SWEETIN: State calls Terrie Sena.

25 THE COURT: Let me call my TPO.

1 (Whereupon a recess was taken
2 at 10:32 a.m. while other
3 matters were heard after
4 which the following
5 proceedings took place
6 commencing at 10:36 a.m.:)

7 THE COURT: All right. We're back on the
8 record, Mr. Sena, 14F14785X.

9 TERRIE SENA,
10 having first duly affirmed to tell
11 the truth under the pain and penalty
12 of perjury, was examined and testified
13 as follows:

14 THE CLERK: State your name and spell it
15 for the record.

16 THE WITNESS: Terrie Sena, T-E-R-R-I-E,
17 S-E-N-A.

18 THE COURT: Move forward. Marshal.

19 THE DEPUTY MARSHAL: Yes, Judge.

20 THE COURT: All right. So you're speaking
21 into the microphone right there.

22 DIRECT EXAMINATION

23 BY MR. SWEETIN:

24 Q. Good afternoon, Ms. Sena. Are you familiar
25 with Chris Sena?

1 A. Excuse me.

2 Q. Are you familiar with Chris Sena?

3 A. Yes, I am.

4 Q. Do you see that person in the courtroom
5 today?

6 A. Yes, I do.

7 Q. Could you point that person out and
8 identify something he or she is wearing.

9 A. Right there.

10 Q. What's that person wearing today?

11 A. Blue.

12 Q. Sitting in the middle of these two people
13 at the table?

14 A. Yes.

15 MR. SWEETIN: May the record reflect the
16 witness identified the defendant.

17 THE COURT: Yes.

18 MR. SWEETIN:

19 Q. How are you familiar with him?

20 A. He's my ex-husband.

21 Q. When you say he's your ex-husband --

22 (Overlapping speakers --

23 record unattainable.)

24 THE WITNESS: About 16, 1987, '87, '88.

25 MR. SWEETIN:

1 Q. And over that period of time, were you --
2 you indicated you were married; is that correct?

3 A. Yes.

4 Q. Over how many years were you married?

5 A. It was September 1990 to August 1997.

6 Q. And you're currently not married.

7 A. Yes, I'm married.

8 Q. Not married to the defendant.

9 A. Oh, no.

10 Q. Are you familiar with the residence located
11 at 6012 Yellowstone Avenue here in Las Vegas, Clark
12 County, Nevada?

13 A. Yes.

14 Q. How are you familiar with that?

15 A. I lived there for 15 years.

16 Q. Over what period of time would that be?

17 A. From '98 until 2013.

18 Q. 2013 or 2014?

19 A. 2013 then I came back at the end, beginning
20 of January 2014.

21 Q. So that period from up to 2013 then you
22 also lived there for a number of months toward the
23 middle of 2014. Would that be accurate?

24 A. January 2014 until June 2014, yes.

25 Q. Over the period of time that you lived at

1 that residence, did anyone else live at that
2 residence with you?

3 A. Yes.

4 Q. Who would that be?

5 A. My husband, his wife.

6 Q. When you say "his wife," who are you
7 referring to?

8 A. Deborah Sena.

9 Q. So the defendant, Deborah Sena, who else?

10 A. My daughter Anita.

11 Q. When you said Anita, would that be Anita
12 Sena?

13 A. Yes, Anita Sena.

14 Q. You said that's your daughter; is that
15 correct?

16 A. Yes.

17 Q. Biological daughter?

18 A. Yes, it is.

19 Q. And who is the father of that child?

20 A. Christopher Sena.

21 Q. Anyone else besides Anita?

22 A. Terry Sena.

23 Q. And when you say "Terry Sena," is that a
24 male or female?

25 A. Male.

1 Q. And who is Terry Sena?

2 A. My son.

3 Q. And when you say your son, who is the
4 biological father?

5 A. Christopher Sena.

6 Q. And besides Terry Sena, who else?

7 A. Brandon Sena.

8 Q. And Brandon Sena, how was he related to
9 you?

10 A. I guess a stepchild because he wasn't my
11 son. He was Deborah Sena and Christopher Sena's
12 child.

13 Q. Okay. So Deborah Sena who was the
14 defendant's wife at the time and the defendant's
15 child. Would that be correct?

16 A. Correct.

17 Q. Anyone else?

18 A. Ryan Sena.

19 Q. Okay. And in regard to Ryan, how was he
20 related to you?

21 A. He's my son.

22 Q. He's your biological son.

23 A. Yes.

24 Q. And is the defendant the biological father
25 of Ryan Sena?

1 A. No.

2 Q. So is that essentially the folks that were
3 living there when you were living at that residence?

4 A. Yes.

5 Q. Now, while you were living there, were you
6 familiar with an individual by the name of Melissa
7 Clark?

8 A. Yes. She is my sister.

9 Q. Is she older or younger than you?

10 A. My younger.

11 Q. And did you in fact have occasion to see
12 Melissa Clark while you were living at that
13 residence?

14 A. Yes.

15 Q. How about Erin Clark?

16 A. Yes.

17 Q. And who is Erin Clark?

18 A. My niece.

19 Q. And who is Erin Clark's mother and father?

20 A. Melissa Clark.

21 Q. And that's your sister that you just spoke
22 of?

23 A. Yes.

24 Q. And did she also have occasion to visit you
25 while you were living at the residence we made

1 mention of on Yellowstone?

2 A. Yes.

3 Q. And how about Tamara Grisham?

4 A. Yes, she's my niece.

5 Q. And when you say your niece, how
6 specifically are you related to her?

7 A. She is my other sister's daughter.

8 Q. When you say other sister, who are you
9 referring to?

10 A. Kimberly Grisham. She is my other sister.

11 Q. Did she also have occasion to visit that
12 residence?

13 A. Yes.

14 Q. Have you recently been charged with crimes
15 committed within that house?

16 A. No.

17 Q. Have you been charged with things that
18 happened at that Yellowstone Avenue residence?

19 A. Yes.

20 Q. And as a result of those charges, did you
21 resolve those charges pursuant to negotiation?

22 A. Yes.

23 Q. I'm showing you what's marked as State's
24 proposed Exhibit 23 and 24. I want you to take a
25 look at these, see if you recognize those.

1 THE COURT: Show them. Do you need a
2 copy?

3 MS. RADOSTA: I'd appreciate it.

4 THE COURT: Do you have a copy?

5 MR. SWEETIN: We provided the court records
6 so they're in Odyssey.

7 (Sotto voce conversation between
8 the clerk and the Court.)

9 THE COURT: Could we get a copy.

10 MR. SWEETIN: Sure.

11 THE COURT: I don't know what other
12 documents you have. All the photos have been shown.

13 MS. RADOSTA: I just -- we did the visual.

14 THE COURT: Are there any other documents
15 other than the photos?

16 MR. SWEETIN: I don't believe so. I'll
17 show them to defense counsel just to make sure.

18 MR. SWEETIN:

19 Q. So showing you what's been marked as
20 State's proposed Exhibit 23 and 24. If you take a
21 look at these and see if you recognize those
22 documents.

23 THE COURT: And, ma'am, you have counsel
24 here. If you want to consult with your attorney at
25 any point in time, you can feel free to. He can sit

1 next to you if you like or if you want to consult
2 with him any time, let me know.

3 THE WITNESS: Yes, ma'am.

4 THE COURT: Do you want to consult with him
5 now?

6 THE WITNESS: No I'm fine. Yes, I
7 recognize them.

8 MR. SWEETIN:

9 Q. Turning your attention to what's marked
10 State's proposed Exhibit 23, is that not the guilty
11 plea agreement relating to the resolution of your
12 case?

13 A. Yes, sir.

14 Q. And in that guilty plea agreement you agree
15 to plead guilty to one count of sexual assault; is
16 that correct?

17 A. Yes.

18 Q. And you agree to a sentence of ten years to
19 life in prison; is that correct?

20 A. Yes.

21 Q. And also pursuant to that agreement you
22 agree to testify truthfully in this proceeding; is
23 that correct?

24 A. Yes.

25 Q. And turning your attention to what's marked

1 State's proposed Exhibit 24. Is this in fact a
2 judgment of conviction which documents the sentence
3 that you received in this case?

4 A. Yes.

5 Q. And that sentence was in fact ten years to
6 life; is that correct?

7 A. Yes.

8 MR. SWEETIN: The State would move for the
9 admission of what's been marked State's proposed
10 Exhibit 23 and 24.

11 MS. RADOSTA: I'll submit.

12 THE COURT: Admitted.

13 MR. SWEETIN:

14 Q. Now, I want to talk a little bit with you
15 in regards to things that were happening within that
16 house that you in fact were charged with in your case
17 as well as other things that you observed in the
18 course of you living at that residence. All right?

19 A. Yes.

20 Q. First, I wanted to focus on particular acts
21 or sexual acts committed on children within that
22 residence. Did you become aware as you lived at that
23 residence of such sexual acts being committed?

24 A. Yes.

25 Q. I want to focus first on Melissa. You

1 previously testified I believe that Melissa was your
2 sister; is that correct?

3 A. Yes.

4 Q. Now, you indicated that Melissa had come
5 over to that residence and visited from time to time;
6 is that correct?

7 A. Yes.

8 Q. Over what period of time?

9 How old was Melissa when she was visiting
10 the residence as you lived there?

11 A. 15, 16.

12 Q. And over that period of time were there
13 particular sexual acts that occurred at that
14 residence involving Melissa?

15 A. There was pictures taken.

16 Q. Can you be more specific?

17 A. There was naked pictures taken of Melissa.

18 Q. How did those pictures come to be taken?

19 A. They were staged by my husband Christopher.

20 MS. RADOSTA: I'm sorry. I couldn't
21 understand.

22 THE COURT: Could you repeat that.

23 THE WITNESS: They were taken by my husband
24 Christopher.

25 THE COURT: You don't have to talk that

1 close to the microphone. You can push it forward a
2 little bit.

3 MR. SWEETIN: I can help you if you'd
4 like.

5 THE COURT: Did you hear her?

6 MS. RADOSTA: Yes, I did. It just got a
7 little distorted. Thank you, Your Honor.

8 MR. SWEETIN:

9 Q. When you say they were staged by Chris, are
10 you referring to the defendant?

11 A. Yes.

12 Q. Can you be more specific as far as this.
13 What were the circumstances taken? Can you detail
14 that for us?

15 A. Nobody was around. It was just Melissa,
16 myself, and Christopher.

17 Q. Okay. Now, showing you what's marked as
18 State's proposed Exhibits 13 through 22. I ask you
19 if you could look through these and after you've
20 looked through them, let me know when you're
21 finished.

22 Have you had an opportunity to look at all
23 those photos?

24 A. Yes, sir.

25 Q. Do you recognize the content of those

1 photos?

2 A. Yes.

3 Q. And what is the content of those photos?

4 A. There's pictures of me and Melissa together
5 naked and there's -- most of the pictures were of
6 Melissa naked.

7 Q. Did you recognize the surroundings of those
8 photos?

9 A. Yes. One was, some were in the office and
10 then the others were actually photographed at my
11 parents' house.

12 Q. Would it be fair to say that all of the --
13 well, let me go through then.

14 You indicated that some of these photos
15 were taken at places other than your residence.

16 A. Yes.

17 Q. Which of these photos were taken someplace
18 other than the residence we previously made reference
19 to?

20 You're making reference to State's proposed
21 Exhibit No. 14.

22 A. Yes. That's my parents' house in Melissa's
23 bedroom. And that one.

24 Q. State's proposed Exhibit 15.

25 A. That one.

1 Q. State's proposed Exhibit 16.

2 MS. RADOSTA: I'm sorry. I can't hear what
3 she's saying.

4 MR. SWEETIN:

5 Q. You're making reference to State's proposed
6 Exhibit 18 at this time. Is that taken at the
7 residence you made reference to or some other
8 residence?

9 THE COURT: If you could speak up, ma'am.

10 THE WITNESS: That's at the Yellowstone
11 address.

12 THE COURT: What was that picture?

13 MR. SWEETIN:

14 Q. Is that State's proposed Exhibit 18?

15 A. Yes.

16 Q. Okay.

17 THE COURT: So 18 was at Yellowstone.

18 Thank you.

19 THE WITNESS: That's at Yellowstone.

20 MR. SWEETIN:

21 Q. You're making reference to State's proposed
22 Exhibit 19.

23 A. Uh-huh. That was at my parents' house.

24 Q. And that's proposed State's Exhibit 20.

25 A. Yes. And these two are my parents' house.

1 MR. SWEETIN:

2 Q. State's proposed Exhibit 21 and 22.

3 A. Yes, and this is the office at
4 Yellowstone.

5 Q. And you're making references to State's
6 proposed Exhibit 13 was actually the Yellowstone
7 residence.

8 A. Yes.

9 Q. Now, in regards to you said as to those
10 photos you sort of delineated them were taken at
11 other places besides the Yellowstone residence. You
12 made reference to your parents' residence; is that
13 correct?

14 A. Yes.

15 Q. Where is your parent's residence located?

16 A. At that time it was 2012 Tonopah.

17 Q. Is that here in Las Vegas, Clark County,
18 Nevada?

19 A. North Las Vegas.

20 Q. North Las Vegas, Clark County, Nevada.

21 A. Yes.

22 Q. Now, the photos that we've seen appear to
23 be photos of yourself and your sister; is that
24 correct?

25 A. Yes.

1 Q. And who took all these photos?

2 A. Chris.

3 Q. Would that be the defendant?

4 A. Yes.

5 Q. Now, I wanted to talk to you a little
6 bit --

7 THE COURT: Are you moving to admit those?

8 MR. SWEETIN: I'm not, Judge, not at this
9 point.

10 Q. Now, I also wanted to talk to you in
11 regards to Tamara Grisham. You mentioned that she
12 was your niece who came and visited the house at some
13 time; is that correct?

14 A. Yes.

15 Q. And about how old was she when she visited
16 your residence?

17 A. 16.

18 Q. Did she visit just when she was 16 or when
19 she was younger than 16?

20 A. No, just when she was about 16.

21 Q. Okay. Now, in regards to her visiting your
22 residence, do you recall anything happening of a
23 sexual nature while she visited?

24 A. Yes.

25 Q. Could you describe that to the Court.

1 A. Tamara came over and she wanted me to dye
2 her hair so I dyed her hair and upon washing it, she
3 went into the bathroom in the office and she took a
4 shower and that's where Chris filmed her taking a
5 shower.

6 Q. Now, you made mention that Chris filmed her
7 taking a shower. Can you be more specific?

8 A. He had a camcorder and there was an
9 accordion door and there's like an opening on the top
10 and he would get on the step stool and hold the
11 camcorder into the bathroom where the shower was.

12 Q. So it would be fair to say that when he was
13 recording Tamara in the shower, that she would not be
14 able to see him.

15 A. Correct.

16 Q. And that was the purpose of him climbing up
17 on the chair and kind of angling in through a little
18 opening door.

19 A. Yes.

20 Q. Where were you when this was happening?

21 A. Giving oral sex.

22 Q. How many times did this occur where he in
23 fact would film Tamara as she was taking a shower?

24 A. Just that one time.

25 Q. I'm showing you what's marked as State's

1 proposed Exhibits 5, 8, and 9. I ask if you
2 recognize these.

3 A. Yes.

4 Q. And what are those?

5 A. Pictures of Tamara in the shower.

6 Q. Are those in fact still photos of the video
7 that was made?

8 A. Yes.

9 MR. SWEETIN: And the State would move for
10 the admission of what's been marked as State's
11 proposed Exhibit 5, 8 and 9.

12 MS. RADOSTA: I'll submit.

13 THE COURT: Admitted.

14 MR. SWEETIN:

15 Q. Now, in regard to videos that were made
16 such as the one you just described with Tamara, do
17 you know what happened with those videos?

18 A. No.

19 Q. Were you aware of whether or not the
20 defendant maintained videos that he made similar to
21 this?

22 A. No.

23 Q. Did you ever have an opportunity to observe
24 videos that the defendant had of a sexual nature?

25 A. No.

1 Q. Now, I wanted to talk to you a little bit
2 about Erin Clark. You indicated that she was also
3 one of your nieces who visited; is that correct?

4 A. Yes.

5 Q. Did you become aware when she was visiting
6 of anything of a sexual nature occurring?

7 A. Yes.

8 Q. And could you be more specific?

9 A. Erin was visiting and she had got lice from
10 school so we had to wash all the kidses' [sic] hair
11 and doing this we took Erin in the back and I went to
12 take her in the back office to wash her hair in the
13 shower.

14 Q. And when you say we took her to take a
15 shower, could you be more specific?

16 A. I mean it was just me. I took her back.

17 Q. Okay. And what happened once you took her
18 to take a shower?

19 A. I got her set up with the water because she
20 was having a problem getting water on and as soon as
21 I got water, I left the room where she took a shower.

22 Q. And this is the same office that's attached
23 to the residence that we've made reference to; is
24 that correct?

25 A. Yes.

1 Q. What happens next?

2 A. As she's taking a shower, Chris gets the
3 camcorder and takes Erin taking a shower.

4 Q. And were you present when he was doing
5 that?

6 A. Yes.

7 Q. And what were you doing when he was doing
8 that?

9 A. Giving him oral sex.

10 Q. Okay. And was he situated in the same way
11 that you described --

12 A. Yes.

13 Q. -- in regard to Tamara or differently.

14 A. No same way.

15 Q. So he was up on a chair focusing down.

16 A. He was on a stool.

17 Q. On a stool.

18 A. Yes.

19 Q. And I'm showing you what's marked as
20 State's proposed Exhibit No. 6 and I ask if you
21 recognize that.

22 A. Yes.

23 Q. And what is that?

24 A. It's a picture of Erin taking a shower.

25 Q. Okay. Would that be a picture from the

1 video that the defendant took of Erin taking a
2 shower?

3 A. Yes.

4 Q. Did you ever observe any filming in regards
5 to Ryan Sena?

6 A. Yes.

7 Q. And could you describe that.

8 A. Chris had asked me to go get Ryan from the
9 front of the house and I grabbed Ryan from the front
10 house and I took him back to the office and when we
11 got to the office, I noticed that the red light on
12 the computer was on and Chris had me unbuckle Ryan's
13 pants and take his pants off and give him oral sex.

14 Q. Now, you made reference to the office.
15 Would this be at the same residence that we've been
16 talking about?

17 A. Yes.

18 Q. That's the residence over at 6012
19 Yellowstone?

20 A. Yes.

21 Q. At the time that you went back to the
22 office with Ryan, who else was in the office?

23 A. Just Christopher.

24 Q. You indicated that you were caused at that
25 point to perform a sexual act on Ryan; is that

1 correct?

2 A. Yes.

3 Q. Now, in regards to that, where was Chris
4 when this sexual act was being performed?

5 A. He was in his chair by his computer.

6 Q. Does anything happen in the course of you
7 performing that sexual act?

8 A. Yes. Chris was in his chair masturbating.

9 Q. Does Chris ever leave his chair?

10 A. No.

11 Q. Do you remember whether or not Chris in
12 fact presented himself to receive fellatio from you?

13 A. Yes.

14 Q. And was that while in fact you were
15 performing fellatio on Ryan?

16 A. Yes.

17 Q. And what happens at that point?

18 A. As I was giving oral sex to Ryan,
19 Christopher came up and exposed himself and I was
20 holding Ryan while I was giving oral sex to Chris.

21 Q. And what happens next?

22 A. After I gave oral sex to Chris, then Chris
23 had me actually take Ryan's top off and he had Ryan
24 take off my top and he had Ryan put his penis in.

25 Q. Do you remember that happening back in the

1 office?

2 A. Yes.

3 Q. Were there a number of occasions when you
4 had sexual contact with Ryan in the presence of the
5 defendant?

6 A. Yes.

7 Q. About how many?

8 A. Two more times.

9 Q. Were the other occasions in the office or
10 anywhere else within the household?

11 A. In the master bedroom.

12 Q. You mentioned one incident occurred in the
13 office; is that correct?

14 A. Two.

15 Q. Two incidences in the office.

16 A. Uh-huh.

17 Q. We talked about one of those in the
18 office.

19 A. Yes.

20 Q. Let's talk about the one that happened in
21 the master bedroom of that same residence.

22 A. He had me have -- Chris had me have Ryan
23 lay on the bed and he had me undress Ryan and I
24 undressed myself then from what I remember I got on
25 top of Ryan and then his penis went in me and Chris

1 came in behind me and had sex with me at the same
2 time as Ryan.

3 Q. So you indicated that while you were in the
4 bedroom, that Ryan's penis went inside you you said;
5 is that right?

6 A. Yes.

7 Q. Where inside of you?

8 A. In the vagina.

9 Q. And when that happened, do you remember how
10 you and Ryan were situated?

11 A. I was on top of him.

12 Q. So how was Ryan laying on the bed?

13 A. Flat on the bed.

14 Q. Is he laying on his stomach, his side, his
15 back?

16 A. Back.

17 Q. How were you situated?

18 A. On top.

19 Q. Were you laying on top of him or sitting on
20 top of him or how were you situated?

21 A. I was sitting on top of him at first.

22 Q. And then what happens?

23 A. Then I laid down further and Chris came up
24 behind me and performed anal sex.

25 Q. While he was doing that, what were you

1 doing, was Ryan still there?

2 A. Yes.

3 Q. Were you having any sort of sexual contact
4 with Ryan when Chris was penetrating you?

5 A. No.

6 Q. Now, I want to show you what's marked as
7 State's proposed Exhibit 7 and ask if you recognize
8 that.

9 A. Yes. That's the master bedroom.

10 Q. That's the master bedroom of the residence
11 we've been talking about?

12 A. Yes.

13 Q. Do you see anyone within that bedroom?

14 A. Yes. Ryan is laying on the bed, and I'm
15 getting undressed beside him.

16 Q. And Ryan is nude on the bed; is that
17 correct?

18 A. Yes.

19 Q. And you're in the process of taking your
20 clothes off.

21 A. Yes.

22 Q. Is this the incident that we're talking
23 about or is this another incident?

24 A. Same one.

25 MR. SWEETIN: The State moves for the

1 admission of what's been marked as State's proposed
2 Exhibit 7.

3 MS. RADOSTA: Your Honor, I mean there's
4 been absolutely no foundation made as to when this
5 occurred.

6 THE COURT: You're objecting. You want him
7 to lay a foundation.

8 MS. RADOSTA: I guess, Your Honor.

9 THE COURT: Go ahead.

10 MR. SWEETIN:

11 Q. At the time this occurred, approximately
12 how old was Ryan?

13 A. 14.

14 Q. And we talked about three incidents. We
15 haven't talked about thoroughly all of them, but we
16 talked about one that happened out in the office.
17 How old was Ryan on that occasion?

18 A. He was 14.

19 Q. I'm showing you what's also marked as
20 State's Exhibits 11 and 12 and ask do you recognize
21 these.

22 A. Yes.

23 Q. And what are these?

24 A. That's a picture of Chris, myself, and
25 Ryan.

1 Q. Making reference to State's Exhibit No.
2 11.

3 A. Yes.

4 Q. What about State's proposed Exhibit 12.

5 A. That's myself and Ryan.

6 Q. Yourself and Ryan?

7 A. Yes.

8 Q. And where are these pictures taken?

9 A. This is in the office at the Yellowstone
10 address.

11 Q. And it appears in State's proposed
12 Exhibit 12 that you're doing something; is that
13 correct?

14 A. Yes. I'm unbuckling Ryan's shorts.

15 Q. Okay. Would it be fair to say that these
16 are clear and accurate depictions of what happened
17 out in the office that you made reference to?

18 A. Yes.

19 Q. And you indicated that these photos also
20 happened when Ryan was approximately how old?

21 A. 14.

22 Q. How old is he now?

23 A. 17.

24 Q. So approximately three years ago.

25 A. Yes.

1 MR. SWEETIN: The State moves for admission
2 of what's been marked State's proposed 11 and 12.

3 MS. RADOSTA: Same objection. Sometime
4 during the year he was 14. There's an entire
5 calendar year. Which incident? I mean there's just
6 a lot of vagueness there.

7 MR. SWEETIN:

8 Q. Do you remember what -- first I'll make
9 reference to the incident that happened in the office
10 that we just looked at pictures of. Do you remember
11 what time of year that might have happened? If you
12 remember.

13 A. Fall of 2012.

14 Q. Somewhere in that area?

15 A. Yes.

16 Q. And we also have previously made reference
17 to State's proposed Exhibit No. 7. Do you remember
18 that one? You indicated that this was Ryan when he
19 was approximately 14 as well; is that correct?

20 A. Yes.

21 Q. Do you recall what time of year the
22 particular incident that's documented in that photo
23 occurred, if you know?

24 A. I don't. I don't remember.

25 Q. But you remember he was somewhere in the

1 neighborhood of 14 years of age.

2 A. Yes, yes. He was a freshman in high
3 school.

4 Q. Is it fair to say these things happened
5 over an extended period of time; is that correct?

6 A. Yes.

7 MR. SWEETIN: The State moves for admission
8 of what's been marked as State's proposed Exhibit 7
9 as well as State's proposed Exhibit 11 and 12.

10 MS. RADOSTA: Well, Your Honor, with regard
11 to 11 and 12 now we've narrowed it down to a
12 four-month span of time sometime in the fall of 2012
13 so my objection stands as to those, lack of
14 foundation, and 7 there's absolutely no foundation
15 other than sometime during his freshman year of high
16 school.

17 THE COURT: So is this when between January
18 2013 or 2014? What time period are we talking
19 about?

20 MR. SWEETIN: I believe --

21 THE COURT: She said she lived at the
22 Yellowstone house some time period to 2014 then she
23 returned January 2014.

24 MR. SWEETIN:

25 Q. So do you recall what Ryan's date of birth

1 is?

2 A. June 14, 1988.

3 Q. So he would have been 14 in approximately
4 2012; is that correct?

5 A. Yes.

6 MR. SWEETIN: The State would move for
7 admission of the items previously referenced.

8 THE COURT: All right. So they are
9 pictures of her and Ryan in the fall of 2012. Are
10 all the pictures in the fall of 2012? Are they in
11 the same time period?

12 THE WITNESS: About three weeks time
13 period.

14 THE COURT: I'm going to admit them. 11,
15 12, 7 are admitted.

16 MS. RADOSTA: So I just want to make sure
17 what the record is now. A few moments ago she had no
18 idea when No. 7 was. Now it's her testimony it was
19 sometime within three weeks of the other pictures.
20 Is that the testimony now?

21 MR. SWEETIN: I think that misstates the
22 testimony. I think she indicated she didn't have a
23 particular recollection of when these things
24 occurred. As the Court's well aware in the case of
25 child abuse cases, sexual abuse cases, sometimes

1 there are ranges of years pled, five, ten years
2 because these aren't the sort of things that people
3 take their notebooks out and write down.

4 She's doing, giving her best recollection.
5 I think she indicated that she remembered it was
6 sometime during the year of Ryan's freshman year in
7 high school. I think that's what she indicated. She
8 didn't indicate specifically, you know, what range
9 the other incident might have been.

10 THE COURT: I thought she testified it was
11 within three weeks. So the incident in the office
12 and the incident in the bedroom was over a three-week
13 period of time.

14 THE WITNESS: From what I recall, yes.

15 MS. RADOSTA: That was exactly my
16 understanding. One moment she said she didn't have a
17 recollection and then she said three weeks so I was
18 just making sure the record was clear.

19 THE COURT: I asked a question and she
20 answered about when it occurred so I'm going to admit
21 7, 11, and 12. They're admitted.

22 MR. SWEETIN: May I continue, Judge.

23 THE COURT: Yes.

24 MR. SWEETIN:

25 Q. You made reference to one incident in the

1 office and one incident in the bedroom; is that
2 correct?

3 A. Yes.

4 Q. You indicated that there was another
5 incident in the office.

6 A. Yes.

7 Q. And what happened on that occasion?

8 A. Chris had me get Ryan and I took him back
9 to the office and I noticed that the red light on the
10 computer was on.

11 Q. Okay.

12 A. And I had took -- unbelted Ryan's pants and
13 I performed oral sex and then Ryan put his penis in
14 my vagina when I was laying flat on my back.

15 Q. And those are the two incidents that you
16 recall that happened back in the office; is that
17 correct?

18 A. Yes.

19 Q. You indicated that the red light was on the
20 computer when you went back there. What significance
21 does that have to you?

22 A. It's the camera saying it was recording.

23 Q. So you knew it was recording?

24 A. Yes.

25 Q. In regard to that last incident in the

1 bedroom, when approximately did that happen? I'm
2 sorry. The last incident in the office, when did
3 that happen?

4 A. That happened in 2014 just before I left.

5 Q. Okay. Now, besides your sexual contact
6 with Ryan, was there any sexual contact that you he
7 observed in regard to Brandon?

8 A. Yes.

9 Q. Could you describe that to the Court.

10 A. I had got Brandon from the house and I
11 brought him back to the office and I had unbuckled
12 his pants and I performed oral sex and then I took
13 his pants off and his top, my top, my bra, and my
14 clothes and Chris had him touch my breasts, and then
15 I laid flat on my back and Brandon proceeded to put
16 his penis in me.

17 Q. And approximately when did that happen?

18 A. That happened in December of 2012.

19 Q. When that happened, who else was present
20 inside the office?

21 A. That was Brandon, me, and Chris.

22 Q. Okay. And at the same office at the same
23 residence we've been discussing, correct?

24 A. Yes.

25 Q. Did this happen on one occasion or more

1 than one occasion?

2 A. Twice.

3 Q. The second occasion that occurs,
4 approximately when does it occur?

5 A. It happened a month after the first
6 incident so about January 2013.

7 Q. And how did that second occasion occur?

8 A. The same way. He had me have Brandon come
9 back to the office and the light was on indicating
10 that he was recording.

11 Q. And it was at that time that the same
12 circumstances happened that you just described.

13 A. Yes.

14 Q. And Brandon would have touched your breasts
15 and also put his penis inside of your vagina.

16 A. Yes.

17 MS. RADOSTA: Objection, Your Honor,
18 leading.

19 THE COURT: Sustained.

20 MR. SWEETIN:

21 Q. What occurred on that second occasion?

22 A. On the second occasion Christopher had
23 Brandon come inside me is what he --

24 Q. Did he have him touch you anywhere?

25 A. Yes, my breasts.

1 Q. And what did he have you touch you with on
2 your breasts?

3 A. His hands.

4 Q. And you indicated that something else
5 occurred as well; is that correct?

6 A. Yes.

7 Q. And what happened specifically?

8 A. As soon as I -- as soon as Brandon touched
9 my breasts, proceeded and I unbuckled his pants and I
10 performed oral sex on him before he put his penis in
11 my vagina.

12 Q. And how were you situated when he placed
13 his penis in your vagina?

14 A. I was flat on my back.

15 Q. Were there any other incidences that you
16 recall involving Brandon?

17 A. No.

18 Q. How about Anita, were there any incidences
19 involving Anita?

20 A. Yes.

21 Q. Could you describe those to us.

22 A. I was in the livingroom at the house and
23 Christopher, Anita, and myself and he had Anita lean
24 over the ottoman and he performed sex on her while
25 she was touching my breasts. He had me take off my

1 top.

2 Q. So you indicated that Anita bent over the
3 ottoman; is that correct?

4 A. Yes.

5 Q. And where was the defendant located in
6 regard to Anita at that time?

7 A. He was behind her.

8 Q. And was Anita's clothes on or off at that
9 time?

10 A. They were off. She took them off.

11 Q. Okay. So she was nude at that time.

12 A. Yes.

13 Q. And how about the defendant?

14 A. He was nude.

15 Q. He was nude as well?

16 A. Yes.

17 Q. And you indicated at that time that the
18 defendant penetrated Anita at that time.

19 A. Yes.

20 MS. RADOSTA: Objection, Your Honor. How
21 could she possibly know? That lacks foundation.

22 MR. SWEETIN: She can cross-examine. I'm
23 asking her.

24 THE COURT: All right. Can I hear the
25 whole question first.

1 MR. SWEETIN: Sure.

2 Q. At that time as Anita is bent over the
3 ottoman and the defendant is behind Anita, what
4 happened?

5 A. Chris put his penis in her A-hole.

6 Q. In her anus?

7 A. Yes.

8 MS. RADOSTA: Objection, Your Honor, lack
9 of foundation.

10 MR. SWEETIN: She can cross her. She is
11 describing what she saw.

12 THE COURT: Let her finish her objection.

13 MS. RADOSTA: On a certain level I guess
14 speculation. This is not happening to Ms. Sena.
15 This is happening to another person. How could she
16 possibly know these things? It's speculation on her
17 part.

18 THE COURT: Well, she just testified to
19 it. You can explore it on cross-examination. So I'm
20 going to overrule your objection at this time.

21 MR. SWEETIN: Thank you.

22 Q. Just to be clear, what caused you to
23 believe that the defendant placed his penis inside of
24 Anita's anus?

25 A. Because of the way she reacted.

1 Q. How did she react?

2 A. Her eyes got really big.

3 Q. Did you hear any noise?

4 A. Yes. She said, "Ouch."

5 Q. Okay. And where were you located at the
6 time that you observed these things?

7 A. The ottoman and the couch are really close
8 by each other.

9 Q. So where were you in relation to Anita at
10 that time?

11 A. I was sitting on the couch facing Anita.

12 Q. So you had been in front of Anita facing
13 her.

14 A. Yes.

15 Q. Now, you indicated that at that time
16 that -- well, what was your state of dress at this
17 point as you sit here?

18 A. I was just sitting watching.

19 Q. Did you have any clothes on?

20 A. Yes.

21 Q. Did you have your top on?

22 A. Yes.

23 Q. What happens next?

24 A. After he's behind her, then he has me take
25 off my top and have Anita fondle my breasts.

1 Q. When you say Anita fondled your breasts,
2 exactly how -- what did she do to your breasts?

3 A. She put her hands on my breasts.

4 Q. Did she put anything else on your breasts
5 besides her hands?

6 A. No.

7 Q. Did she ever put her mouth on your breasts?

8 A. No.

9 Q. Anita -- I just wanted to speak to you very
10 quickly in regards to -- I'm sorry. Terrie, I just
11 wanted to talk to you very quickly in regards to the
12 sexual activity that was occurring within this
13 house.

14 Do you recall when sexual activity
15 involving children within that house, that residence
16 began?

17 A. From my recollection Anita was 17 when it
18 happened.

19 Q. Well, when we're talking about Anita, the
20 incident with Anita was 17?

21 A. Yes, she was a senior in high school.

22 Q. I want to talk to you generally about the
23 activity within the house, when it actually started.

24 A. The very first time Ryan was five.

25 Q. Five years old?

1 A. Yes.

2 Q. And at the time they were five what
3 happened?

4 A. Chris had me and Deborah get Brandon and
5 Ryan. Brandon and Ryan followed us into the master
6 bedroom and he had me undress Brandon and he had
7 Deborah undress Ryan and he had us perform oral sex
8 on them.

9 Q. Now, when you made mention of Deborah, who
10 are you referring to?

11 A. Chris's wife.

12 Q. Would that be Deborah Sena?

13 A. Yes.

14 Q. And when you made reference to Chris having
15 you bring them into the room, would that be the
16 defendant?

17 A. Yes.

18 Q. And as you were in the room performing
19 fellatio, which child did you perform the fellatio
20 on?

21 A. Brandon.

22 Q. And which child did Deborah perform
23 fellatio on?

24 A. Ryan.

25 Q. Where was the defendant?

1 A. The defendant was standing on the side of
2 the bed.

3 Q. At that time were you aware of whether or
4 not that was recorded?

5 A. No.

6 Q. Did you ever become aware of whether or not
7 that was recorded?

8 A. No.

9 MR. SWEETIN: The State will pass the
10 witness.

11 (Whereupon Mr. Sweetin concluded
12 this portion of his examination
13 at 11:26 a.m.)

14 CROSS-EXAMINATION

15 BY MS. RADOSTA:

16 Q. Good morning, Terrie. Do you still go by
17 the name Terrie Sena?

18 A. No.

19 Q. You've remarried, correct?

20 A. Yes.

21 Q. And you remarried in November of this past
22 year, correct?

23 A. November 2014.

24 Q. In November of 2014. And you actually
25 moved out of the Yellowstone address in June of 2014,

1 correct?

2 A. Yes, June 12th.

3 Q. June 12, 2014.

4 A. Yes.

5 Q. So and you were married approximately four
6 or five months after that; is that correct?

7 A. Yes.

8 Q. Is the person that you married, did you
9 know that person while you were living at the
10 Yellowstone address?

11 A. No.

12 Q. So regarding the agreement that you
13 have to testify, just a couple quick questions and
14 I'm referring to Exhibit 23. I actually don't think
15 you really need a copy for the purpose of this
16 question.

17 There have been meetings with you and the
18 prosecutors, correct, in order to prepare for
19 your testimony here today, correct?

20 A. Yes.

21 Q. More than one meeting, correct?

22 A. Yes.

23 Q. And were you -- where did the -- how many
24 meetings have there been?

25 A. Two.

1 Q. Two?

2 A. Yes.

3 Q. Okay. And did the first one -- and are you
4 counting like the meeting that you just had in the
5 moments prior to today's hearing starting, are you
6 counting that as one of the two?

7 A. No. I'm counting January 22nd and July
8 9th.

9 Q. So you had a meeting on January 22nd where
10 you actually were recorded.

11 A. Yes.

12 Q. And then there was another meeting on the
13 9th of July.

14 A. Yes.

15 Q. And where did the meeting on the 9th of
16 July take place?

17 A. Prison.

18 Q. And was your attorney present for that?

19 A. Yes.

20 Q. Were there any other meetings between you
21 and either Ms. Holthus or Mr. Sweetin?

22 A. No.

23 Q. Mr. Sweetin never went out to the prison to
24 prepare you for the last preliminary hearing.

25 A. No, just July 9th.

1 Q. Just July 9th. Okay. So you and Chris met
2 when you were in high school; is that right?

3 A. Yes. I was a senior in high school.

4 Q. You were about 16, 17 years old.

5 A. Yes, I was 16 and a half.

6 Q. And you got married I think you said in
7 1988.

8 A. No, 1990, September 17, 1990.

9 Q. Sorry. 1990 you were married. And I'm
10 sorry. The date was September.

11 A. September 17th.

12 Q. Okay. So Anita was born prior to you guys
13 getting married.

14 A. Yes.

15 Q. So you and Chris -- were you living
16 together prior to you getting married --

17 A. Yes.

18 Q. -- and raising Anita at that point in time?

19 A. Yes.

20 Q. 'Cause she was born I think it's May of
21 1990; is that correct?

22 A. Yes.

23 Q. So after that point in time you and Chris
24 had some rough patches, is that fair to say, between
25 Anita's birth and Tails' birth?

1 A. Yes.

2 Q. Tails was born in 1994, correct?

3 A. Yes.

4 Q. In that period of time you actually moved
5 out of the house; is that correct?

6 A. Yes.

7 Q. And you moved up to Colorado; is that
8 correct?

9 A. Yes.

10 Q. And at some point you -- one of the two of
11 you actually filed documents to start a divorce,
12 correct?

13 A. Yes.

14 Q. Back in 1993.

15 A. 1993.

16 Q. So Chris filed some paperwork for divorce
17 and then something changes and the divorce does
18 not -- it never becomes official.

19 A. Right.

20 Q. And then Tails is born?

21 A. Yes.

22 Q. Is that the reason why the divorce did not
23 go through because you found out you were pregnant?

24 A. No.

25 Q. So you had already reconciled and kind of

1 decided no divorce and then you got pregnant with
2 Tails.

3 A. Yes.

4 Q. And Tails was actually born up in
5 Colorado.

6 A. Colorado.

7 Q. And so did Chris relocate up to Colorado --

8 A. Yes.

9 Q. -- after you had left Las Vegas?

10 A. We went together.

11 Q. Oh, you went together to Colorado.

12 A. Yes.

13 Q. At what point in time did you guys go to
14 Colorado? Tails was born in 2004.

15 A. No. 1994. The summer of 1994 we left.

16 Q. Okay. Just so there's clarification, his
17 name is actually Terry Tails Sena.

18 A. Yes.

19 Q. So Tails is his middle name?

20 A. Yes.

21 Q. And the family called him Tails so there
22 wasn't confusion between you and him.

23 A. Yes.

24 Q. So you sometime decided as a family to move
25 back to Las Vegas.

1 A. I did.

2 Q. You moved without Chris. You left Chris up
3 in Colorado. So you brought the kids down here with
4 you to Las Vegas --

5 A. Yes.

6 Q. -- and moved in with your parents.

7 A. Yes.

8 Q. And how long were you living with your
9 parents then with Anita and Tails?

10 A. January of 2000 -- oh, wait 1995. Sorry.

11 Q. January 1995 until when?

12 A. About August-September.

13 Q. Of '96?

14 A. No '95.

15 Q. Of '95.

16 A. Yes.

17 Q. So it was less than a year of separation.

18 A. Right.

19 Q. And you moved back in with Chris with the
20 kids at that point.

21 A. Yes.

22 Q. Is that the Yellowstone --

23 A. That's a different Yellowstone but it was
24 still Yellowstone.

25 Q. It was not 6012.

1 A. No, it was 6021 -- 6120.

2 Q. 6120 Yellowstone is where Chris was living
3 at that point in time so we're talking 1996.

4 A. Uh-huh.

5 THE COURT: That's yes.

6 THE WITNESS: Yes.

7 MS. RADOSTA:

8 Q. You decide to move back in with Anita and
9 Tails.

10 A. Yes.

11 Q. And then at that point were you aware if
12 Chris was seeing Deborah at that point in time?

13 A. No.

14 Q. Let me rephrase the question. Was Chris
15 seeing Deborah at that point in time?

16 A. No.

17 Q. Okay. And at what point in time did you
18 become aware that he was seeing Deborah?

19 A. Just before on your divorce in '97.

20 Q. Okay. And what time of year? Do you
21 remember when the divorce --

22 A. It was finalized August '97.

23 Q. August '97. Okay. So you found out right
24 at the time you're getting divorced that he's seeing
25 Deborah.

1 A. Yes.

2 Q. Did you know Deborah?

3 A. No.

4 Q. And then Ryan is born the next year in
5 1998, correct?

6 A. Yes, June of '98.

7 Q. So you and Chris are officially divorced
8 and Anita and Tails are with you or are they with
9 Chris after the divorce?

10 A. They're with their father.

11 Q. They're with Chris.

12 A. Yes.

13 Q. So you move out of the house where Chris
14 and the kids were after the divorce.

15 A. I had the kids until before the divorce and
16 then they went with Chris.

17 Q. Okay. Was that an official court order or
18 did you just decide the kids would be better off with
19 Chris?

20 A. Anita wanted to go with Chris.

21 Q. At this point in time Anita is seven years
22 old.

23 A. Yes.

24 Q. So you listened to the wishes of your
25 seven-year-old daughter. And then you felt that your

1 at that point three-year-old son would also be better
2 off left with his father.

3 A. Well, actually the agreement was Anita was
4 going to be with Chris and Tails was going to go with
5 myself but I didn't want to split them up so I
6 decided to have Tails go with his sister.

7 Q. And then you -- did you stay here in Las
8 Vegas after the divorce?

9 A. Yes.

10 Q. Okay. Did you routinely visit Anita and
11 Tails?

12 A. Yes.

13 Q. And at some point in time you met Ryan's
14 dad and you have a brief relationship with Ryan's
15 dad. Fair to say?

16 A. Yes.

17 Q. And then Ryan is born in June of '98.

18 A. Yes.

19 Q. By that point in time are you back
20 living -- are you now living at the Yellowstone
21 address?

22 A. No. I'm at my parents' house.

23 Q. You're at your parents' house while you're
24 pregnant --

25 A. Yes.

1 Q. -- with Ryan.

2 A. Ryan, yes.

3 Q. Is that the only time that you were -- let
4 me rephrase.

5 You're pregnant with Anita. You're
6 pregnant with Tails, and you're pregnant with Ryan.
7 The only pregnancy that you're living at your
8 parents' house, is that Ryan's pregnancy?

9 A. Yes.

10 Q. The 1997 divorce, who filed the paperwork
11 for that?

12 You said Chris filed the paperwork
13 originally in '93/'94. Who filed it in '97?

14 A. Chris.

15 Q. And after Ryan is born in 1998, you found
16 out that Deborah was also pregnant, correct?

17 A. Yes.

18 Q. And that she was pregnant by Chris,
19 correct?

20 A. Yes.

21 Q. And then Brandon was born in August '98.

22 A. Yes.

23 Q. How long after Ryan is born did you move
24 into the Yellowstone address?

25 A. He was six months old.

1 Q. Six months old. So right around Christmas
2 time of '98.

3 A. Yes.

4 Q. And whose idea was it for you to move into
5 the Yellowstone address?

6 A. Chris.

7 THE COURT: I'm sorry. Which Yellowstone
8 address?

9 MS. RADOSTA: I apologize.

10 Q. Are we still at Chris's father's residence
11 or is it now the 6012?

12 A. At the 6012.

13 Q. At what point, if you know, did Chris move
14 to the 6012 address? Do you know when?

15 A. I don't recall. I think it was the summer
16 of '98.

17 Q. So around the time that he and Deborah got
18 married.

19 A. A little after I think.

20 Q. After -- so you move into the Yellowstone
21 address around December of 1998.

22 A. Yes.

23 Q. And between December of 1998 and 2013 you
24 moved out of that Yellowstone address more than a few
25 times. Is that fair to say?

1 A. No. I moved out in 2013.

2 Q. You were there constantly from 1998 until
3 2013. You never moved out.

4 A. I left a couple times but only for a few
5 days or a couple hours. I wasn't gone very long.

6 Q. But you would characterize them as you
7 moving out. You left the family for a period of
8 time, correct?

9 A. No.

10 Q. No?

11 A. No.

12 Q. Let me try that again. Did you ever
13 between 1998 and 2013 take Ryan and move out of the
14 house at Yellowstone?

15 A. No, just 2013.

16 Q. Just 2013. That's the only time you packed
17 your bags and left.

18 A. Right.

19 Q. And in 2013 did you move out in January of
20 2013 or June of 2013?

21 A. No. I actually moved out in May 2013.

22 Yeah, 'cause it was Labor Day weekend. Memorial
23 Day. I'm sorry.

24 Q. And Ryan went with you, correct?

25 A. Yes.

1 Q. Would it surprise you to know that Ryan
2 said you guys moved out in January 2013?

3 A. No.

4 Q. I mean your memory is that it was May.

5 A. It was May, Memorial Day, 'cause it was a
6 three-day weekend. I remember that.

7 Q. And in May of 2013 you packed your bags,
8 packed Ryan's bags, and moved out.

9 A. Yes.

10 Q. And what caused you to move out?

11 A. I was tired of what was happening in the
12 house.

13 Q. Did Ryan ask you to leave?

14 A. Yes.

15 Q. So Ryan comes to you and says, "Mom, I
16 don't want to live under this roof anymore."

17 A. Right.

18 Q. And you and Ryan packed your bags and moved
19 out of the house.

20 A. Yes.

21 Q. And you went and lived with your parents.

22 A. Yes.

23 Q. And there was no argument with Chris about
24 you and Ryan leaving.

25 A. Well, I secretly left.

1 Q. How did you secretly leave?

2 A. I packed my bags and I put them in the
3 trunk of the car and I took Ryan to school and I
4 acted like I went to work and I picked Ryan up out of
5 school and then I left.

6 Q. And you left and moved to your parents'
7 house, correct?

8 A. Yes.

9 Q. And Chris knew where your parents lived,
10 correct?

11 A. Yes.

12 Q. And Ryan stayed in school after you moved
13 out, correct?

14 A. Yes.

15 Q. So you moved out and about how long of a
16 drive would it be from the Yellowstone address to
17 your parents' house?

18 A. About eight minutes.

19 Q. So you secretly move out and move to a
20 location where Chris could easily find you. Fair to
21 say?

22 A. Fair to say.

23 Q. And after moving out, were you still in
24 contact with Chris?

25 A. No.

1 Q. Were you in contact with Anita?

2 A. No, not at this point.

3 Q. But Anita is still living at the house with
4 Chris, correct?

5 A. Yes.

6 Q. And Brandon is still living at the house
7 with Chris.

8 A. Yes.

9 Q. And Tails is still living at the house with
10 Chris.

11 A. Yes.

12 Q. But you're with Ryan.

13 A. Yes.

14 Q. Did you have contact with any of the
15 children other than -- while Ryan was with you
16 contact with Anita, Tails, or Brandon during this
17 period of time you were out of the house?

18 A. Tails.

19 Q. You had contact with Tails.

20 A. Yes.

21 Q. Often or once or twice.

22 A. A few times.

23 Q. And you were out of the house from and your
24 testimony is May of 2013 until January 2014.

25 A. Yes.

1 Q. Referencing your testimony on direct, the
2 incident that you had talked about with Anita, with
3 Ryan, with Brandon, those all occurred prior to you
4 moving out, correct?

5 A. Yes.

6 Q. So you moved out and you knew there was
7 stuff going in the home, correct?

8 A. Yes.

9 Q. That you were upset by, correct?

10 A. Yes.

11 Q. That Ryan was upset by, correct?

12 A. Yes.

13 Q. And you just moved out of the house and did
14 not call the police, correct?

15 A. Yes.

16 Q. Didn't call CPS, correct?

17 A. Yes.

18 Q. You didn't make an anonymous tip to the CPS
19 hotline about abuse in that home, correct?

20 A. Correct.

21 Q. You didn't check on your daughter Anita to
22 see how she was doing.

23 A. Correct.

24 Q. And when you talked to Tails, did you talk
25 to him at all about what was going on inside the

1 house?

2 A. No.

3 Q. And then in January 2014 despite everything
4 that you knew what was going on in that house, you
5 moved your son Ryan back into that house, correct?

6 A. Yes.

7 Q. And what was Ryan's reaction to moving back
8 into the house?

9 A. He didn't want to.

10 Q. He didn't want to. And you disregarded his
11 wishes and moved back in anyway.

12 A. Yes.

13 Q. After you moved back in January 2014, were
14 there any incidents of any type of sexual relations
15 between you and any of the kids?

16 A. No.

17 Q. After when you moved back in.

18 A. Correct.

19 Q. And then in June of 2014 Deborah, Brandon,
20 and Anita all leave.

21 A. Yes.

22 Q. And they leave in the middle of the night,
23 correct?

24 A. Early in the morning.

25 Q. Early in the morning. You were not made

1 aware that they were planning on leaving, correct?

2 A. Correct.

3 Q. Deborah didn't tell you, Anita didn't tell
4 you. Brandon didn't tell you.

5 A. No.

6 Q. When you woke up the morning I think it was
7 like June 12th of 2014 --

8 A. Yes, it was June 12th.

9 Q. When you woke up that morning, was it
10 obvious that they were gone in the house?

11 A. No.

12 Q. So there wasn't a lot of items missing from
13 the house.

14 A. No.

15 Q. No televisions, no Play Stations, things
16 like that.

17 A. The Play Station was missing.

18 Q. The Play Station was missing.

19 A. Yes.

20 Q. And the reaction of Chris when Deborah and
21 Brandon and Anita were gone that morning was to tell
22 you you had to leave, correct?

23 A. Yes.

24 Q. Because he was upset with you that they had
25 left, correct?

1 A. Yes.

2 Q. He felt that it was your fault that they
3 were leaving, that they left, correct?

4 A. Yes.

5 Q. And so you packed up your bags with Ryan
6 and you left?

7 A. Yes.

8 Q. And at that point where did you go?
9 Did you move back in with your parents
10 again?

11 A. Yes.

12 Q. What was your parents' reaction to you
13 going back and forth with Ryan between their house
14 and the house on Yellowstone?

15 A. They didn't like it.

16 Q. They didn't like that you were staying at
17 their house or they didn't like that you were going
18 back to Chris?

19 A. They didn't like I was going back to Chris.

20 Q. I mean the living arrangement of you and
21 Deborah both being in that house is a little odd.
22 Wouldn't you say?

23 A. Yes.

24 Q. The fact that she's married to Chris and
25 you're his ex-wife and you were both living under the

1 same roof. That is a little odd.

2 A. Correct.

3 Q. The neighbors didn't have that particular
4 living arrangement, correct?

5 A. Yes.

6 Q. Your sister Melissa didn't have a similar
7 living arrangement. Your parents didn't have a
8 similar living arrangement.

9 A. Yes.

10 Q. So when you move out in June of 2014, do
11 you have any contact with Deborah?

12 A. No.

13 Q. Did you try to let her know that you were
14 no longer in the house and if she wanted to go back,
15 she could go back?

16 A. Yes. I texted Anita.

17 Q. You texted Anita. So you were having
18 contact with Anita.

19 A. On Facebook.

20 Q. And do you recall how long after June 12th
21 you texted or Facebooked her?

22 A. I Facebooked her right after I left.

23 Q. Okay. Did she respond to your text?

24 A. No.

25 Q. Was that the only communication you had

1 with Anita after you moved out?

2 A. I tried several times during that point in
3 time.

4 Q. What was Ryan's reaction when he woke up
5 that morning and they were all gone?

6 A. He didn't have a reaction.

7 Q. No reaction at all.

8 A. No.

9 Q. He wasn't upset that his sister had moved
10 out and not told him she was leaving?

11 A. No.

12 Q. What was the relationship like between Ryan
13 and Anita? They were half brother and sister,
14 correct?

15 A. Yes.

16 Q. So biologically related through you.

17 A. Yes.

18 Q. What was their relationship like?

19 A. It was good. It was a normal
20 brother/sister relationship.

21 Q. There's about eight years between them. Is
22 that fair to say?

23 A. Yes.

24 Q. When they were younger, was Anita a
25 babysitter to Ryan?

1 A. When Anita was old enough.

2 Q. So at what age did Anita start babysitting
3 Ryan?

4 A. I believe she was about 15.

5 Q. So she was left in charge of Ryan and
6 Brandon too?

7 A. All of the kids.

8 Q. All of the kids. When you moved out on
9 June 12, 2014, was Tails still living at the
10 residence?

11 A. Yes.

12 Q. And so when you moved out, you just moved
13 out with Ryan and Tails stayed behind; is that
14 correct?

15 A. Yes.

16 Q. So Chris did not tell Tails to leave as far
17 as you know, correct?

18 A. Correct.

19 Q. He just wanted you to leave. Did he want
20 Ryan to leave?

21 A. Yeah.

22 Q. So he said you and Ryan need to leave.
23 Deborah needs to come back.

24 A. Yes.

25 MS. RADOSTA: Court's indulgence.

1 THE COURT: Yes.

2 MS. RADOSTA: I'm sorry. Let's go back for
3 a second to May 2013 when you moved out.

4 Q. Did you tell Deborah that you were leaving?

5 A. No, I didn't tell anybody.

6 Q. You didn't tell anybody.

7 A. Right.

8 Q. How long did it take you to make the
9 decision to move out after Ryan said he wanted to
10 leave?

11 A. It was shortly after.

12 Q. Okay. A week, a month?

13 A. A week.

14 Q. And how did the conversation with Ryan
15 start that causes you to decide to move out?

16 A. The conversation started that he couldn't
17 take it there anymore, he didn't want to see me cry
18 every day.

19 Q. Okay. So does he -- I mean are you -- just
20 to give a little bit of background, you actually had
21 a bed or bedroom in the back trailer, correct?

22 A. In the office.

23 Q. In the office.

24 A. Yes.

25 Q. Did you have a separate entrance into the

1 office from the rest of the house?

2 A. Yes.

3 Q. Okay. So you didn't actually live in the
4 house, in the main house.

5 A. No.

6 Q. Is that a fair statement?

7 A. Fair, uh-huh.

8 Q. So there's the main house. And how many
9 bedrooms are in the main house?

10 A. Three.

11 Q. So there's a master bedroom, Anita's
12 bedroom --

13 A. And the boys.

14 Q. -- and the boys' bedroom. Then there was a
15 trailer in the back, the office where there was
16 office equipment, and also you had a bed back there.

17 A. Yes. I had a bed and a kitchen.

18 Q. This conversation with Ryan, do you know
19 where it took place?

20 A. I don't recall that.

21 Q. It was somewhere within the house, though.

22 A. Yes.

23 Q. And is this the first time Ryan had ever
24 expressed unhappiness to you about the living
25 situation?

1 A. No.

2 Q. How many other times did he express
3 unhappiness to you about the living situation?

4 A. About three times.

5 Q. And what made this session different that
6 you decided that you needed to leave?

7 A. I was actually at my breaking point at that
8 time 'cause I couldn't stand it but I was also afraid
9 for Ryan too, his feelings. I was concerned about
10 them.

11 Q. And the other -- you said there were a
12 total of about four times that Ryan had expressed
13 unhappiness. The fourth time was the one that caused
14 you to move out.

15 A. Yes.

16 Q. Over what period of time were those
17 conversations with Ryan?

18 A. It was like a couple nights in between.

19 Q. Okay. I mean all four of them occurred
20 within a few month period of time.

21 A. Yes.

22 Q. So probably is it fair to say during the
23 first part of 2013?

24 A. Yes.

25 Q. Is that fair to say?

1 When you guys moved out, did Ryan have to
2 change schools? I'm sorry. Let me just give a
3 little context.

4 When you and Ryan moved out in May of 2013,
5 he was starting school in August/September. Did he
6 have to change schools?

7 A. Yes. He went to Sunset.

8 Q. It was a different school. So he was no
9 longer attending school with Brandon?

10 A. Correct.

11 Q. Were Brandon and Ryan in the same school?

12 A. (No audible response.)

13 Q. So up until that point in time, what school
14 did they attend?

15 A. Sunrise High School.

16 Q. Was Ryan happy to change schools?

17 A. Yes.

18 Q. You actually were a Clark County school
19 district employee, correct?

20 A. Yes.

21 Q. Substitute teacher?

22 A. Yes.

23 Q. At what point in time did you get that
24 certification?

25 A. 2010.

1 Q. Did you ever teach at the school with, that
2 Ryan and Brandon went to?

3 A. Yes.

4 Q. How many times do you think you taught at
5 that school?

6 A. A few times.

7 Q. So you knew some of the teachers.

8 A. Yes.

9 Q. You knew some of the administrators, things
10 like that?

11 A. Yes.

12 Q. Did you have any friends at that school?

13 A. No.

14 Q. After you moved out in May of 2013 and you
15 were living at your parents' house, did you see
16 Melissa at all?

17 A. Yeah, she was in the same house.

18 Q. She was living there as well.

19 A. Yes.

20 Q. Did you and Melissa ever have any
21 conversations about what had been going on at the
22 house?

23 A. No.

24 Q. What about the photographs that you say
25 were taken of Melissa when she was so much younger,

1 did you ever talk to her about those?

2 A. No.

3 Q. Whose idea was it to have her daughter come
4 to the house, Erin?

5 Was it Melissa's idea to let her come to
6 the house or was it your idea?

7 A. My idea.

8 Q. It was your idea.

9 A. Yes.

10 Q. How many times did Erin visit the house?

11 A. A few time times.

12 Q. What's "a few"?

13 A. She came over quite a bit, like every other
14 weekend.

15 Q. From what age to what age?

16 A. I would say about 8 to 13.

17 Q. Okay. And this was always at your
18 invitation?

19 A. Yes.

20 Q. And did you have a conversation with
21 Melissa at all about, you know, I'll be there. Don't
22 worry about it, she'll be fine, something along those
23 lines?

24 A. Yeah.

25 Q. And yet you were aware that there was

1 videotaping of Erin going on in the shower, correct?

2 A. Yes.

3 Q. And you invited her over to the house after
4 you knew of that videotaping occurring, correct?

5 A. No.

6 Q. That was the last time Erin came to the
7 house.

8 A. Yes. I made excuses for her not to come
9 over.

10 Q. What were the excuses?

11 A. I would tell the family she had other
12 things, she was going to her friend's house, that she
13 couldn't come over.

14 Q. Which family are you talking about,
15 Melissa?

16 A. No, my family. My kids.

17 Q. Was Erin upset she wasn't allowed to come
18 over to the house any longer?

19 A. I don't know.

20 Q. You never had a conversation with Erin
21 about that.

22 A. No.

23 Q. What about Tamara's mom Kimberly when you
24 were living at your parents' house in 2013, was she
25 at that house?

1 A. No.

2 Q. Was Erin at the house with her mom Melissa?

3 A. Yes.

4 Q. Did you ever talk to Erin about anything
5 that was going on at your house?

6 A. No.

7 Q. Melissa is your younger sister by about ten
8 years, correct?

9 A. Yes.

10 Q. And so when you were first meeting Chris,
11 Melissa was quite young, six, seven years old?

12 A. Yes.

13 Q. And when you were pregnant with Anita she
14 was about nine or ten.

15 A. Yes.

16 Q. And then the photographs that you were
17 shown here today, you are indicating that she was
18 about 15 or 16 in those photos; is that correct?

19 A. She was between 15 and 16, yes.

20 Q. She was aware that those photos were being
21 taken, correct? I mean she's looking directly at the
22 camera, correct?

23 A. Yes.

24 Q. Did you ever have a conversation with her
25 about don't tell mom and dad we're taking these

1 pictures or anything like that?

2 A. No.

3 Q. And Chris, you never heard Chris say
4 something like that to her either, correct?

5 A. Correct.

6 Q. You never -- I mean as far as Melissa knew,
7 you still had these photos, correct?

8 A. Yes.

9 Q. You never told her that you destroyed them
10 or anything like that, correct?

11 A. No.

12 Q. Since you accepted this plea agreement and
13 some of the details of what was going on in the house
14 has come out, has Melissa been to visit you?

15 A. Yes.

16 Q. Does she accept phone calls from you --

17 A. Yes.

18 Q. -- from the prison.

19 Does she write letters to you?

20 A. Yeah, she writes me.

21 Q. And she knows about the videos that were
22 made of her daughter, correct?

23 A. As far as I know, yes.

24 Q. And as far as you know she knows that you
25 were standing right out the door when those videos

1 were being made, correct?

2 A. Yes.

3 Q. And that you were the one that brought Erin
4 into the back bathroom, correct?

5 A. As far as I know.

6 Q. When you moved back in January 2014, was
7 that in response to Anita and Tails asking to you
8 come back?

9 A. Yes.

10 Q. How were they asking you? Was it a phone
11 call? Was it face-to-face?

12 A. Text.

13 Q. Text. Were they texting you independent of
14 one another?

15 A. Yes.

16 Q. And about how many text messages were there
17 from Anita?

18 A. Three.

19 Q. Over a couple week period of time, one
20 week, what was it?

21 A. No, it was within a week frame.

22 Q. And Tails was texting you at the same time?

23 A. Yes.

24 Q. And in response to those texts you decided
25 to move back in.

1 A. Yes.

2 Q. What exactly in those text messages made
3 you decide to move back in?

4 A. They told me that they wanted me there.

5 Q. That they just wanted you there.

6 A. They wanted me there and that their dad
7 wanted me there as well.

8 Q. Okay. Did you sit down and have a
9 conversation with Ryan before you made the decision
10 to move back into the house?

11 A. No.

12 Q. You just told Ryan, "Hey, we're moving
13 back."

14 A. Yes.

15 Q. And did Ryan say, "Not me. I'm staying
16 here with grandma and grandpa."

17 A. No.

18 Q. If he had said that, would you have let
19 him? Because he's -- your parents are his biological
20 grandparents. If he had wanted to stay with his
21 biological grandparents, would you have allowed him
22 to?

23 A. Yes.

24 Q. Did he have to switch schools again?

25 A. No. He stayed in the same school.

1 Q. The text messages, were they to your phone?

2 A. Yes.

3 Q. Okay. And they were coming from -- this
4 might sound like a silly question, but they were
5 coming from Anita's phone.

6 A. Yes.

7 Q. A number you recognized to be Anita's
8 phone.

9 A. Yes.

10 Q. And a number you recognized to be Tails'
11 phone.

12 A. Yes.

13 Q. Did you ever have a face-to-face
14 conversation with Anita about her request to you to
15 come back home?

16 A. No.

17 Q. What was Anita's reaction when you showed
18 up at the front door with all your stuff?

19 A. I didn't bring all my stuff. I just
20 brought some clothes.

21 Q. What was Anita's reaction when you showed
22 up at the door?

23 A. She was glad.

24 Q. Did she know you were coming?

25 A. No, not until I showed up.

1 Q. Okay. Why didn't you tell them you were
2 coming? Why didn't you tell them you were moving
3 back in?

4 A. It was a last minute decision.

5 Q. Okay. What caused it to be a last minute
6 decision?

7 A. I guess I would surprise them I was coming
8 back.

9 Q. Surprise Anita that you were coming back?

10 A. Right.

11 Q. What was your relationship like with Anita?

12 A. It was strained. We were kind of having
13 mother/daughter issues.

14 Q. And would it be fair to say that when you
15 were living in the house from -- what was the time
16 frame from January 2014 to June of 2014 -- Anita felt
17 closer to Deborah than she did to you.

18 MR. SWEETIN: Objection, calls for
19 speculation.

20 / / /

21 MS. RADOSTA:

22 Q. If you know.

23 MR. SWEETIN: Well, she can't speculate as
24 to how someone feels.

25 THE COURT: I'll sustain it.

1 MS. RADOSTA:

2 Q. Did Anita seem to have more conversations
3 with Deborah than she did with you?

4 A. Yes.

5 Q. More -- did she seem to share more
6 information with Deborah than she did with you?

7 A. Yes.

8 Q. And was one of the reasons that you decided
9 to move back into the house to try to repair your
10 relationship with Anita?

11 A. No.

12 Q. Why was Tails asking you to come back, was
13 there anything specific in his request?

14 A. No.

15 Q. Just please come back.

16 A. Yes.

17 Q. And that was enough to make you change your
18 mind and disregard Ryan's wishes.

19 A. Yes, 'cause --

20 Q. During the time -- I'm trying to get my
21 dates here. Tails turned 18 in 2012, is that
22 correct, or is it 2012? He's born in 90 --

23 A. He is born in '94.

24 Q. So he turned 18 in 2012.

25 A. Yes.

1 Q. After he turned 18 he moved out of the
2 house, correct?

3 A. Yes.

4 Q. He was allowed to leave the house.

5 A. Yes.

6 Q. Got his own place, correct?

7 A. Yes.

8 Q. Got his own apartment, paid his own rent,
9 things like that?

10 A. He stayed with a friend.

11 Q. But he wasn't living under your roof.

12 A. Yes.

13 Q. And then he moved back in after that.

14 A. Yes.

15 Q. His own decision as far as you know to move
16 back in the house.

17 A. Yes.

18 Q. Did he ever move out again while you were
19 still living there?

20 A. No.

21 Q. So how long a period of time was Tails out
22 of the house?

23 A. About five, six months.

24 Q. And that was when he was 18 or when he was
25 19?

1 A. He was 18.

2 Q. It was shortly after his birthday, correct?

3 A. Yes.

4 Q. And then while he's still 18 he moves back
5 into the house.

6 A. Yes.

7 Q. And continues to live there.

8 A. Yes.

9 Q. He shared a bedroom with Ryan and Brandon;
10 is that correct?

11 A. Yes.

12 Q. About how much square footage is within the
13 whole house would you say?

14 A. A thousand square feet I would say.

15 MS. RADOSTA: Court's indulgence.

16 Q. When Deborah and Anita and Brandon moved
17 out, did you have any idea that Deborah was planning
18 to file divorce papers against Chris?

19 A. No.

20 Q. At what point in time did you find out that
21 Deborah was planning to file divorce papers?

22 A. When Chris asked me to help him file a
23 motion to seize all assets so Deborah couldn't leave
24 with Brandon or sell any of the assets.

25 Q. Okay. And when approximately was that?

1 A. August.

2 Q. So after you had --

3 THE COURT: August of?

4 MS. RADOSTA: I'm sorry.

5 Q. August of 2014.

6 A. Yes.

7 Q. And so after you moved out in June of 2014,
8 you continued to have contact with Chris, correct?

9 A. No.

10 Q. Was this conversation where he asked you to
11 help him out regarding the divorce with Deborah, was
12 that the first conversation you had with Chris?

13 A. Yes.

14 Q. So prior to that no text messages, no
15 Facebook, no phone calls with Chris.

16 A. Correct.

17 Q. Did you have access on your phone to the
18 security cameras around the house?

19 A. Yes.

20 Q. And when you left that day with Ryan in May
21 of 2014 you took your phone with you, correct?

22 A. Yes.

23 Q. Did you continue to access the security
24 cameras on your phone after you left?

25 A. No.

1 Q. Not once?

2 A. Not once.

3 Q. What was the program you used on the phone
4 to access the security cameras within the house?

5 A. I don't know the program.

6 Q. It was an app on your phone.

7 A. Yes. Chris set it up for me. I don't
8 recall.

9 Q. So you had access to -- there were
10 approximately four cameras inside the main house,
11 correct?

12 A. Correct.

13 Q. So you had access to the security cam
14 footage on your phone at any point in time, correct?

15 A. Yes.

16 Q. The entire time you lived there and even
17 after you moved out.

18 A. Just when I lived there.

19 Q. Once you moved out, did you no longer have
20 access?

21 A. I didn't.

22 Q. You chose not to use it.

23 A. Yes.

24 Q. Is that fair to say?

25 A. Yes.

1 Q. But you still had access if you wanted it.

2 A. If I wanted it.

3 Q. Okay. During the period of time that you
4 moved out from May of 2013 to January 2014, did you
5 access the security cam footage at that point in
6 time?

7 A. No.

8 Q. And that, the security camera showed you
9 the livingroom, correct?

10 Did it show any of the bedrooms?

11 A. No.

12 Q. And you weren't the only one that had
13 access to the security cam footage on your phone,
14 correct?

15 A. Correct.

16 Q. Anita had access to her phone, correct?

17 A. (No audible response.)

18 Q. Did Deborah have it on her phone?

19 A. Yes.

20 Q. Did all of the kids have access on their
21 phones?

22 A. No.

23 Q. What about Tails?

24 A. I don't recall if Tails had it on there.

25 Q. Anita, Deborah, and you all had access to

1 the security cams.

2 A. Yes.

3 Q. Was it like live coverage?

4 Could you pull it up to see what was going
5 on at your house?

6 A. Yes.

7 Q. And you said Chris was the one who put the
8 app on your phone.

9 A. Yes.

10 Q. So he gave you access to the security cam
11 --

12 A. Yes.

13 Q. -- correct.

14 Getting back to Deborah and Chris's
15 divorce, did you ever have a conversation with
16 Deborah about the divorce?

17 A. No.

18 Q. About the fact that she wanted a divorce.

19 A. No.

20 Q. She never came to you and said, "What
21 attorney did you use when you went through the
22 divorce with Chris?"

23 A. No.

24 Q. Nothing like that.

25 A. No.

1 Q. After you moved out in May until the day
2 that Chris was arrested, did you have any
3 conversations with Deborah?

4 A. No.

5 Q. Did you know that she went to the police?

6 A. No.

7 Q. Did you know that Anita or Brandon went to
8 the police?

9 A. No.

10 Q. How did you find out that Chris had gotten
11 arrested?

12 A. Tails texted me and told me.

13 Q. Tails was at the house, correct?

14 A. Yes. He was there at the time.

15 Q. After you found out that Chris was
16 arrested, did you ever any conversations with Deborah
17 at that point?

18 A. No.

19 Q. What about Anita?

20 A. No.

21 Q. And what about Ryan, did you have any
22 conversations with Ryan?

23 A. No.

24 Q. But at some point in time after Chris was
25 arrested the police wanted to talk to you, correct?

1 A. Correct.

2 Q. And the police wanted to talk to Ryan,
3 correct?

4 A. Correct.

5 Q. Do you remember when that happened in
6 relationship to when Chris was arrested?

7 A. I got a call from a detective in November.

8 Q. And do you recall does middle of September
9 sound about right when Chris was arrested?

10 A. Yes.

11 Q. So it took about six weeks, eight weeks
12 before you were contacted by Metro.

13 A. Yes.

14 Q. You were aware from Tails that the police
15 came in and took the computer, correct?

16 A. Yes.

17 Q. Tails told you that.

18 A. Yes.

19 Q. How did you find out -- and I apologize if
20 I already asked you this. How did you find out that
21 Deborah had spoken to the police?

22 Did you find that out from the police, did
23 you find that out from Tails, from Anita, how did you
24 find that out?

25 A. From the police.

1 Q. Were you surprised that the police wanted
2 to speak with you?

3 A. Yes.

4 Q. Just to be clear, were you and Deborah
5 arrested on the same day?

6 A. Yes.

7 Q. Okay. And you made several court
8 appearance with Deborah, correct?

9 A. Yes.

10 Q. And you're aware that Anita in particular
11 is quite upset that Deborah is facing charges.

12 A. Yes.

13 Q. Has she expressed the same level of upset
14 that you're facing charges?

15 A. I don't know.

16 Q. Have you heard anything from Anita that
17 leads you to suspect she's upset you faced charges?

18 A. No.

19 Q. Does that upset you that she seems more
20 concerned about her stepmother than she did about
21 you?

22 A. Of course.

23 Q. And Anita hasn't come to visit you since
24 you've been in custody, correct?

25 A. Correct.

1 Q. No phone calls. Sorry. Have you reached
2 out to Anita via phone?

3 A. Yes.

4 Q. And she's not accepted the charges.

5 A. Yes.

6 Q. Okay. I just want to make sure. So you
7 have not -- you have or have not had phone
8 conversations with Anita since you've been in
9 custody?

10 A. I had one.

11 Q. One?

12 A. Uh-huh.

13 Q. When was that?

14 A. Couple weeks ago.

15 Q. Okay. How long did the phone conversation
16 last?

17 A. It only lasted a minute.

18 Q. Was she willing to talk to you or did she
19 --

20 A. Yes.

21 Q. -- hang up the phone?

22 A. No. She talked to me.

23 Q. The incident with Tamara and Erin in the
24 shower, which one happened first?

25 A. Tamara.

1 Q. Okay. So after the incident with Tamara
2 happened, you weren't surprised at all to see the
3 videotape on Erin, correct?

4 A. Can you repeat that.

5 Q. Sorry. It's a little bit of a poorly
6 worded question on my part. You were aware that
7 Tamara was videoed in the shower, correct?

8 A. Yes.

9 Q. You were right there when it happened.

10 A. Yes.

11 Q. So I think you said Erin had gotten lice in
12 her hair at school so you were helping her get rid of
13 the lice.

14 A. Yes.

15 Q. So you brought her back to the back bedroom
16 to take the shower.

17 A. Yes.

18 Q. So when you realized there was videotaping
19 going on, that did not surprise you.

20 A. Yes, it did.

21 Q. It did surprise you even though it had
22 already happened with Tamara.

23 A. Yes.

24 Q. When was the time frame between when it
25 happened with Tamara and when it happened with Erin?

1 A. Like two years.

2 Q. Okay. So you -- it didn't even enter into
3 your mind that this could happen if you brought Erin
4 back into that back bedroom.

5 A. Right.

6 Q. The State showed you a bunch of still
7 photographs. Other than those still photographs,
8 have you reviewed any of the videotapes in this case?

9 A. No.

10 Q. Some of the photos of Melissa that you were
11 shown, you said some of them were taken at your
12 parents' house.

13 A. Correct.

14 Q. Were you and Chris living at your parents'
15 house at that time when those photos were being
16 taken?

17 A. No.

18 Q. Okay. So how is it that you and Chris end
19 up taking photographs of Melissa at your parents'
20 house?

21 A. We were visiting my parents.

22 Q. And you said that was here in Clark County;
23 is that correct?

24 A. Yes.

25 Q. By "visiting," what do you mean, just over

1 for the afternoon or were you spending a couple days
2 there?

3 A. No, just visited.

4 Q. Where were your parents when those
5 photographs were being taken?

6 A. They were gone.

7 Q. Do you recall where your parents were?

8 A. I don't remember where they went.

9 Q. They were just gone. Was it a vacation or
10 just the afternoon?

11 A. They were just gone for the afternoon.

12 Q. Okay. And prior to the photographs being
13 taken, did Melissa -- was Melissa aware that that's
14 what you had in mind to take photographs?

15 A. No.

16 Q. Who got naked first, you or Melissa? There
17 are a couple photographs where you're both naked at
18 the time. Who got naked first, you or Melissa?

19 A. We both were at the same time.

20 Q. At the same time. So you just kind of
21 said, hey, this would be fun with your sister --

22 A. No.

23 Q. -- to get naked. I'm just trying to figure
24 out how that happened that you and your sister get
25 naked together and then there's photographs taken of

1 it.

2 Did you get naked first?

3 Did she get naked first?

4 A. No, we both did at the same time.

5 Q. And is the camera out at that point?

6 A. Not at that point.

7 Q. If you recall how long you and Melissa were
8 naked before the camera appeared?

9 A. A few seconds.

10 Q. And how long did the photo session last?

11 A. Just took the photos and that's it.

12 Q. That's it. So you and Chris go over to the
13 house to visit. Who brought the camera?

14 Was the camera already at the house?

15 Did you bring the camera with you?

16 A. The camera was already at the house.

17 Q. Was it Melissa's camera?

18 Was it your parents' camera?

19 A. No.

20 Q. Whose camera was it?

21 A. It was mine.

22 Q. Do you recall what type of camera it was?

23 Was it a digital camera?

24 A. Yeah, it was a small digital.

25 Q. And what were you doing prior to the

1 photographs being taken? What were you and Chris and
2 Melissa doing that afternoon at the house?

3 A. Talking.

4 Q. I'm sorry.

5 A. Talking.

6 Q. Do you recall what you were talking about?

7 A. Yes. Melissa's birthday was coming up, her
8 16th.

9 Q. Her 16th birthday was coming up. And so
10 were you discussing the birthday plans?

11 A. Yes.

12 Q. Where were you in the house when you were
13 discussing the birthday plans?

14 A. Her bedroom.

15 Q. If you recall, what were the birthday plans
16 going to be?

17 A. Chris had bought her tickets to go see a
18 concert.

19 Q. And so you're discussing Melissa's birthday
20 plans and how does that evolve into taking off your
21 clothes?

22 A. That was the main for the concert, that was
23 the kind of -- the pictures.

24 Q. So you let Melissa know that if she really
25 wanted her present, she was going to have to take her

1 clothes off.

2 A. Chris did.

3 Q. But you were there.

4 A. Yes.

5 Q. You didn't say, "Hey, Chris, this is her
6 birthday present. Let's just give her the tickets."

7 A. Correct.

8 Q. You just said, "Let's all get naked and
9 take photos," because you were naked as well,
10 correct?

11 A. Yes.

12 Q. And you were in the photos as well,
13 correct?

14 A. Correct.

15 Q. Did you and Chris leave the residence, your
16 parents' house before your parents came home?

17 A. Yes.

18 Q. And when you left, was Melissa fully
19 dressed or was she still naked?

20 A. No, she was fully dressed.

21 Q. So how long after the photographs were
22 taken did you and Chris leave?

23 A. About 20 minutes.

24 Q. So the length of the entire visit was how
25 many hours?

1 A. Hour and a half.

2 Q. Hour and a half. And when you got back to
3 the house, the 6012 Yellowstone, did you go right
4 back to the house?

5 A. Yeah.

6 Q. And did you have the camera or did Chris
7 have the camera at that point in time?

8 A. Chris had the camera at that point.

9 Q. But it was your camera.

10 A. Yes.

11 Q. And when was the next time you saw those
12 photographs?

13 A. That's the last time I seen.

14 Q. That's the last time you saw those
15 photographs.

16 A. Yes.

17 Q. The back area where your bed was was also
18 where the computer was, correct?

19 A. Yes.

20 Q. And you slept back there, correct?

21 A. Yes.

22 Q. And Chris didn't sleep back there with you,
23 correct?

24 A. Correct.

25 Q. He slept in the master with Deborah.

1 A. Yes.

2 Q. So you had access to the computer every
3 night when you were asleep, correct?

4 A. No.

5 Q. No?

6 A. No.

7 Q. The computer wasn't in the same area as
8 you.

9 A. It was but it was located.

10 Q. You had no idea how to unlock the
11 computer.

12 A. No.

13 Q. You lived in that household for how many
14 years with that computer?

15 A. 15.

16 Q. And you never figured out how to unlock the
17 computer.

18 A. Correct.

19 Q. You had your own computer in the house as
20 well, correct?

21 A. Laptop.

22 Q. You had a laptop.

23 A. Yes.

24 MS. RADOSTA: Okay. Court's indulgence.

25 Q. The photographs of Melissa you indicated

1 that some of them were at your parents' house and
2 some of them were in the office.

3 A. Yes.

4 Q. Correct. And the ones in the office,
5 that's a completely different day, correct?

6 A. Yes.

7 Q. And it was after the incident regarding the
8 birthday.

9 A. Yes.

10 Q. So how was that -- I mean. So you've
11 already had this one incident with Melissa where
12 photographs were taken. She's aware that photographs
13 were taken. How is it that it happened the second
14 time?

15 How does that conversation start?

16 A. I had called her to see if she wanted to
17 visit and I picked her up.

18 Q. So you -- do you recall about how long
19 after her birthday, after the birthday discussion you
20 called her up and asked her if she wanted to come to
21 visit?

22 A. A month and a half.

23 Q. So you called her up, asked her to come
24 over, and picked her up. Were you aware that there
25 were going to be photographs taken?

1 A. No.

2 Q. So you just invited her to come over to the
3 house.

4 A. Yes, and hang out.

5 Q. And on the way over to the house did you
6 and Melissa have any conversation about these
7 photographs?

8 Is she worried at all about these
9 photographs?

10 A. No.

11 Q. They're just never mentioned again.

12 A. No, they're never mentioned again.

13 Q. So she comes over to the house. And how
14 long is she over at the house on that particular day?

15 A. A few hours.

16 Q. Anybody else home?

17 A. The kids were home I believe.

18 Q. Okay. And then this is back in the
19 office. So you and Melissa go back in the office.

20 A. Yes.

21 Q. And some of the photos that were back in
22 the office, you were actually taking those
23 photographs, correct?

24 A. The one.

25 Q. The one you actually took. So you had

1 control of the camera.

2 A. Yes.

3 Q. And do you recall which number -- I'm
4 sorry. I don't have it in front of me -- which
5 number photograph you actually took the photograph
6 of?

7 A. It was the one where it has like she's got
8 the bikini bottoms on her swimsuit.

9 THE COURT: So who does have the exhibits,
10 23, 24, 8, 9?

11 MS. RADOSTA: I apologize, Your Honor.

12 THE COURT: 7, 8, 9, 11, 12, 23, and 24.

13 MS. RADOSTA: These are not those.

14 THE COURT: So who has 5, 8, 9, 7, 11, 12?
15 They are the only ones I have being admitted at this
16 time.

17 MR. SWEETIN: So it's 5, 8, 9 --

18 THE COURT: 7, 11, 12, 23, and 24.

19 MR. SWEETIN: 20 and 24 is actually the
20 document.

21 THE COURT: 23 and 24, those are the two
22 documents.

23 MR. SWEETIN: So do you want those as
24 well?

25 THE COURT: Maybe we can leave them on the

1 podium or give them to the clerk so nobody walks out
2 with them. Were you asking her about one of those?

3 MS. RADOSTA: Yes. May I approach the
4 witness?

5 THE COURT: Yes.

6 MS. RADOSTA:

7 Q. Are you referring to exhibit, proposed
8 Exhibit 13 as the one that you took the photo of?

9 A. Yes.

10 Q. All the others you were there when
11 photographs were being taken but this one you
12 actually took the photograph of.

13 A. This one I did, yes.

14 MS. RADOSTA: That's I believe State's
15 proposed 13. I don't think these are in.

16 Q. Regarding when Tamara came over to the
17 house, did she often visit the house the way Erin
18 often visited the house?

19 A. No.

20 Q. Her mother is Kimberly. Is Kimberly
21 younger or older than you?

22 A. She's the oldest.

23 Q. She's the oldest. Okay. So how often did
24 Tamara come over to the house?

25 A. Not very often.

1 Q. And that incident you said you were dying
2 her hair; is that correct?

3 A. Yes. She wanted me to color her hair.

4 Q. Color her hair. Okay. And there's more
5 than one bathroom in the residence, correct?

6 A. Yes.

7 Q. There's a bathroom in the main house and
8 then there's a bathroom in the office.

9 A. Right.

10 Q. The bathroom in the office is near where
11 you would sleep.

12 A. Yes.

13 Q. But you made the decision to bring Tamara
14 into the back bathroom.

15 A. Yes.

16 Q. The one with the accordion door. That was
17 your decision to bring her back there, correct?

18 A. Yes.

19 Q. So you were helping her dye her hair and
20 then it was your suggestion that she get in the
21 shower.

22 A. Yes, I was dying her hair.

23 Q. Is it normal to have somebody take a shower
24 after their hair is dyed or is this something where
25 dye got everywhere and you said --

1 A. The shower was the only thing in the office
2 -- sink was not big enough to wash her hair so I had
3 her jump in the shower.

4 Q. In order to wash out the dye.

5 A. Wash everything out, yes.

6 Q. So she gets in the shower and you walk out
7 into the hallway and how does that happen then?

8 Is Chris already out in the hallway?

9 Is Chris already in the office, or do you
10 let Chris know that Tamara's in the shower?

11 A. I shut the accordion door and when I shut
12 it, Chris came in the office at that time.

13 Q. He knew Tamara was taking a shower.

14 A. He knew.

15 Q. Because you told him. You told him you
16 were dying her hair and she was going to have to take
17 a shower, correct?

18 A. He knew, yes.

19 Q. And after that incident with Tamara and her
20 hair being dyed in the shower, did she ever come over
21 to the house again?

22 A. Yes.

23 Q. Okay. How many more times did Tamara come
24 over to the house?

25 A. A couple times to go swimming.

1 Q. Okay. And you were fully aware that -- I
2 believe your testimony was you knew that Chris had a
3 video camera.

4 A. Yes.

5 Q. And you still allowed Tamara to come over
6 to your house, correct?

7 A. Correct.

8 Q. And her mother wasn't with her when she
9 came over to the house, correct?

10 A. No.

11 Q. It was always you were to be the
12 responsible adult, correct?

13 A. Yes.

14 Q. And did Melissa ever come over to your
15 house after those photographs were taken?

16 A. Yes.

17 Q. Many times, correct?

18 A. Many many times.

19 Q. Birthday, holiday, for Christmas,
20 whatever.

21 A. Birthdays, Christmas, swimming in the pool,
22 yes.

23 Q. And you saw that a videotape was being made
24 of Tamara, did you -- you didn't call your sister
25 Kimberly and say, "Hey, something needs to be done.

1 You need to call the police about it," correct?

2 A. Correct.

3 Q. You didn't call the police, correct?

4 A. Correct.

5 Q. Was the incident with Tamara the first time
6 something like that, the first time you saw any
7 videotape happening?

8 A. Yes.

9 Q. And after you saw that there was a
10 videotape being made of Erin, you didn't call up
11 Melissa and say, "Hey, Melissa, you can't let Erin
12 come over here anymore," correct?

13 A. Correct.

14 Q. Didn't tell her what happened to her
15 daughter at the house, correct?

16 A. Correct.

17 Q. And you didn't call the police, correct?

18 A. Correct.

19 Q. Or make an anonymous phone call to the CPS
20 office, correct?

21 A. Correct.

22 Q. You testified to an incident when the boys
23 were five years old when you were giving a blow job
24 or, excuse me, giving fellatio to Brandon and Deborah
25 was giving fellatio to Ryan.

1 A. Correct.

2 Q. After that happened, you didn't pick up

3 Ryan and leave the house, correct?

4 A. Correct.

5 Q. You didn't pick up and call the police

6 immediately after that happened, correct?

7 A. Correct.

8 Q. Even though you knew that that could have

9 seriously had an impact on your son Ryan, correct?

10 A. Yes.

11 Q. And on Brandon, your stepson, correct?

12 A. Correct.

13 Q. You just stayed living at that house for

14 another ten years, correct?

15 A. Yes.

16 Q. Did you and Deborah ever talk about that

17 incident?

18 A. No.

19 Q. How did that incident start?

20 A. Chris had me and Deborah bring the boys in

21 the room and he had the boys lay on the bed and he

22 had me and Brandon -- me and Deborah, I'm sorry,

23 unbuckle Brandon and Ryan's pants and he had me give

24 oral to Brandon while he had Deborah give Ryan.

25 Q. I'm sorry. Go ahead.

1 A. And it just was really quick, really fast
2 and then he had the boys get dressed and leave the
3 room.

4 Q. So you said he made you. Did he say, "Do
5 this"?

6 A. He asked us to do it, yes.

7 Q. And you did it.

8 A. Yes.

9 Q. There wasn't a gun involved, correct?

10 A. Correct.

11 Q. There wasn't a knife involved, correct?

12 A. Correct.

13 Q. There wasn't any threat of physical
14 violence to you, correct?

15 A. Correct.

16 Q. You just said okay, and you pulled down
17 Brandon's pants and you proceeded to put your mouth
18 on his penis, correct?

19 A. Correct.

20 Q. And Deborah did the exact same thing to
21 Ryan.

22 A. Yes.

23 Q. How did it make you feel seeing her do that
24 to your son?

25 A. I cried afterwards.

1 Q. And yet you did not do anything to prevent
2 it happening in the future, correct?

3 A. Chris indicated that was the one and only
4 time that that would happen.

5 Q. But it had happened and you didn't call the
6 police. In your opinion you felt Chris was
7 responsible for it, correct?

8 A. Yes.

9 Q. And you did not call the police, correct?

10 A. Correct.

11 Q. And then years later you see an incident
12 with somebody, Tamara in the shower and a videotape
13 being made of that, correct?

14 A. Yes.

15 Q. Were you worried at that point that perhaps
16 your children, Ryan and Anita and Tails were in some
17 type of harm's way at that point?

18 A. Yes.

19 Q. But you didn't call the police then,
20 correct?

21 A. Right.

22 Q. And after the first incident of you -- was
23 the first incident with you and Ryan or you and
24 Brandon when they were in their teenage years?

25 A. Me and Brandon.

1 Q. After that incident you didn't call the
2 police, correct?

3 A. Correct.

4 Q. You didn't tell Deborah what was going on,
5 correct?

6 A. Right.

7 MS. RADOSTA: Court's indulgence. Nothing
8 further, Your Honor.

9 (Whereupon Ms. Radosta concluded
10 this portion of her examination
11 at 12:32 p.m.)

12 THE COURT: Redirect.

13 MR. SWEETIN: Just a couple quick
14 questions.

15 REDIRECT EXAMINATION

16 BY MR. SWEETIN:

17 Q. You had mentioned earlier in regards to I
18 think you testified as she was asking you questions
19 in regards to pictures taken of Melissa you had said
20 that she was 16. Do you remember that?

21 A. Yes.

22 Q. But then you just testified that at least
23 the pictures that you previously identified as being
24 taken at your parents' house was actually before her
25 16th birthday; is that right?

1 A. 15.

2 Q. So she was actually younger than 15 for
3 those photos.

4 A. It was just before her 16th birthday.

5 Q. Would it be fair to say Melissa is probably
6 a better judge as to how old she was in these
7 particular photos?

8 A. Yes.

9 Q. Now, you also mentioned that ultimately
10 when you moved out of the house in May of 2013 I
11 think you testified that you really didn't have any
12 contact with the defendant; is that correct?

13 A. Right.

14 Q. So he didn't come looking for you.

15 A. Right.

16 Q. He didn't make any threats to you.

17 A. Later on after at the end of the year.

18 Q. While you were gone, he never came looking
19 for you or made any threat to you or anything of that
20 sort; is that correct?

21 A. Right.

22 Q. Okay. You were asked whether or not you
23 told anybody what was happening in the household
24 while you were out of the household. Do you remember
25 that?

1 A. Yes.

2 Q. I'm wondering was one of the reasons that
3 you didn't go to the police is you were concerned
4 that they might prosecute you?

5 A. I was afraid.

6 Q. Did you think you might be prosecuted?

7 A. Yes.

8 Q. So it wasn't in your interest to go to the
9 police at that point. Would that be accurate?

10 A. Yes, I was scared.

11 Q. When you moved back into the residence, you
12 indicated I think in January 2014 you were asked
13 questions in regards to how Anita reacted to that.
14 Do you remember that?

15 A. Yes.

16 Q. How about Deborah, how did Deborah react?

17 A. I didn't get a reaction from Deborah.

18 Q. When you say you didn't get a reaction, was
19 she happy to have you back?

20 A. She didn't say.

21 Q. Did Deborah ever try to leave the
22 residence?

23 A. No.

24 Q. So though you had gone, left the residence
25 for an extended period, you came back on your own.

1 Deborah never tried to leave.

2 A. My knowledge no.

3 Q. And the reason you went back to the
4 residence is you indicated was that you wanted to,
5 your kids had asked you to come back so you decided
6 to go back?

7 A. Yes.

8 Q. So that was your decision.

9 A. Yes.

10 MR. SWEETIN: Okay. Thanks. Nothing
11 further.

12 (Whereupon Mr. Sweetin concluded
13 his examination at 12:35 p.m.)

14 THE COURT: Anything further?

15 MS. RADOSTA: Yes.

16 RECROSS-EXAMINATION

17 BY MS. RADOSTA:

18 Q. Mr. Sweetin just asked you about it wasn't
19 in your best interest to go to the police, correct?

20 A. Yes.

21 Q. So you were more concerned about your own
22 well-being than the safety of your children, correct?

23 A. No, I was scared.

24 Q. You were scared?

25 A. Yes.

1 Q. Of getting in trouble with the police,
2 correct?

3 A. No. I was scared of my son's safety.

4 Q. Your son?

5 A. My son Ryan's safety.

6 Q. I apologize. I'm not quite understanding
7 your answer. You did not go to the police at any
8 point in time, correct?

9 A. Correct.

10 Q. And you're saying that the reason you
11 didn't go to the police is because you were scared
12 for your son's safety.

13 A. Yes, because Chris threatened him.

14 Q. But if you had gone to the police and told
15 them what was going on in the house, wouldn't that
16 most likely have resulted in Chris being arrested?

17 A. Yes.

18 Q. So if you had gone to the police, that
19 would have protected Ryan, correct?

20 A. Yes.

21 Q. And you were also I believe worried about
22 if you went to the police what would happen to you,
23 correct?

24 A. Yes.

25 Q. 'Cause you knew you participated in these

1 actions, correct?

2 A. Yes.

3 Q. And you knew that you could end up
4 basically where you are right now, correct?

5 A. Yes.

6 Q. You didn't want that to happen, correct?

7 A. Yes.

8 Q. Is that fair?

9 A. Yes.

10 Q. And that's one of the reasons why you
11 didn't go to the police.

12 A. One of them.

13 MS. RADOSTA: Nothing further.

14 (Whereupon Ms. Radosta concluded
15 her examination at 12:36 p.m.)

16 THE COURT: Anything further?

17 MR. SWEETIN: No, Your Honor.

18 THE COURT: All right. You're free to go.
19 Thank you.

20 (Whereupon Terrie Sena
21 was excused from the witness
22 stand at 12:36 p.m.)

23 THE COURT: Now is a good time to take a
24 break. Who are we going to start with next?

25 MR. SWEETIN: The police officer is

1 outside.

2 THE COURT: I think the court reporter
3 needs a break so how long, half an hour, 40 minutes?
4 Do you want an hour?

5 MS. RADOSTA: 45 minutes, an hour,
6 whatever.

7 MS. HOLTHUS: I expect that we'll go all
8 day so I would take whatever lunch.

9 THE COURT: I limit our time to 3:30
10 because we start at 7:30 and the court starts at 8:00
11 o'clock. I can shift out staff but at 3:30 we start
12 going into overtime. So how many witnesses can you
13 get in to take and how many do you have for
14 tomorrow?

15 MR. SWEETIN: We have a number of
16 witnesses, Judge. They're not going to take as long.

17 MS. HOLTHUS: I believe this is one of the
18 longest.

19 THE COURT: All right. So let's do this --

20 MS. RADOSTA: In light of the fact, Your
21 Honor, that -- I think --

22 MS. HOLTHUS: We have everybody here
23 because we're kind of not sure of the order we were
24 going to do. We didn't know where we were going to
25 go.

1 MS. RADOSTA: Do you want to go only to
2 3:30 today or to 5:00? If you want to go until 3:30,
3 I would like a half hour. If we're going to go to
4 5:00, I would like an opportunity to actually eat.

5 THE COURT: So tomorrow you're going to
6 have witnesses all day tomorrow too.

7 MS. HOLTHUS: I think they're going to be a
8 lot quicker.

9 MR. SWEETIN: I think the witnesses will go
10 quicker, certainly quicker from our standpoint but he
11 have a total of nine witnesses left.

12 THE COURT: We'll break for a half hour.
13 We'll go until 3:30 assuming that you're not in the
14 middle a witness. If it goes longer, that's fine,
15 and then we'll start tomorrow morning.

16 So figure out then how many witnesses you
17 can get in this afternoon and then everyone else
18 tomorrow morning to the extent that you can figure
19 that out. All right. So we'll be back then at
20 1:15.

21 (Whereupon a recess was taken
22 from 12:39 p.m. until 1:18 p.m.
23 after which the following
24 proceedings took place:)

25 THE COURT: Who is our next witness?

1 MR. SWEETIN: Our next witness is going to
2 be Bill Corral (phonetic).

3 THE COURT: Christopher Sena, 14F14785X.
4 Parties ready to proceed.

5 MR. SWEETIN: I believe so, Judge.

6 MS. RADOSTA: And, Your Honor, just for the
7 record Detective Corral is here I believe to testify
8 about serving a search warrant and I asked
9 Mr. Sweetin for this information a couple days ago.
10 He didn't have it in his file. He's now just handed
11 me about two or three pages of additional discovery
12 on the search warrant.

13 THE COURT: Do you have another witness
14 that you can call so she can review the search
15 warrant?

16 MS. RADOSTA: That's fine, Your Honor. I
17 just wanted to -- I mean I'll do my best.

18 THE COURT: Now is the time to speak up if
19 you need time.

20 MS. RADOSTA: That's fine. We can call
21 some lay witnesses if the Court wants.

22 THE COURT: Yeah. If you have other
23 witnesses here so she can be fully prepared.
24 Mr. Lopez-Negrete, are you cross-examining? Which
25 ones are you cross-examining on?

1 MR. LOPEZ-NEGRETTE: I was going to
2 cross-examine Detective Martinez.

3 THE COURT: Do you have a Detective
4 Martinez?

5 MR. LOPEZ-NEGRETTE: Ramirez.

6 MR. SWEETIN: We do have Detective
7 Ramirez. Of course this detective laid the
8 foundation for the items.

9 THE COURT: What about another witness
10 you're cross-examining.

11 MR. LOPEZ-NEGRETTE: I have Erin, Tamara and
12 --

13 THE COURT: We can call Tamara Grisham.

14 MR. SWEETIN: The State would call Melissa
15 Clark.

16 MR. SWEETIN: Just so the district court
17 record reflects the documents Ms. Radosta received, I
18 just received them from the detective. I haven't had
19 a chance to review them either. I just--

20 THE COURT: Maybe you want to call him
21 tomorrow anyway for your own -- I don't know. How
22 ever. As long as she has an opportunity to
23 cross-examine.

24 MELISSA CLARK,
25 having first duly affirmed to tell

1 the truth under the pain and penalty
2 of perjury, was examined and testified
3 as follows:

4 THE CLERK: State your name and spell it
5 for the record.

6 THE WITNESS: Melissa Clark, M-E-L-I-S-S-A,
7 C-L-A-R-K.

8 THE COURT: Thank you. Have you testified
9 in court before?

10 THE WITNESS: No.

11 THE COURT: Let me just explain the
12 procedure while they're getting ready. Everything
13 that we're saying is being taken down by the court
14 reporter, the lady sitting in front of you. That
15 means we have to verbalize all our responses. We
16 have a habit in general conversation understanding
17 what a question is going to be and start answering
18 it.

19 You can't do that in court. You have to
20 wait until the question is fully asked and then
21 sometimes the other attorneys will object to the way
22 the question is asked so then you have to wait until
23 I rule on the objection. I'll tell you if you can
24 answer the question or not. So if you can pause,
25 make sure the attorney has fully completed their

1 question before you start answering.

2 You also have to make sure you verbalize
3 all your responses. That means you have to speak out
4 loud yes or no as opposed to head shaking or nodding
5 your head or uh-huh or huh-uh so if you do those
6 things, I'll have to prompt you. So try to verbalize
7 everything you're saying.

8 This is not a memory test. They're only
9 asking for your recollection. You may have forgotten
10 it but you may have known at one point in time. I
11 don't know means you never knew the answer. But I
12 don't remember means you knew it at some point in
13 time but as you sit here today, you don't remember.
14 That may trigger them to ask other questions based on
15 your recollection.

16 If you don't understand something, you
17 don't understand something or you don't remember
18 something, make sure you tell them. It requires you
19 to give your best response. If you don't know
20 something, that is your best response.

21 If at any time you don't understand a
22 question, make sure you ask the attorney to rephrase
23 it because there won't be anything on the transcript
24 when this preliminary hearing is completed to show
25 you didn't understand the question, that you're

1 guessing what they meant.

2 Sometimes they use words I don't

3 understand. So make sure you understand everything

4 they're asking if you have any questions whatsoever

5 because then we can ask it a different way.

6 Seomtimes they get dates, years wrong. If they get

7 it wrong, you need to make sure you don't answer the

8 question with misinformation so either correct the

9 mistake or tell them to rephrase the question because

10 it will just be the transcript of the question that

11 was asked out loud and then that you answered that

12 question.

13 THE WITNESS: Okay.

14 THE COURT: If at any point in time you

15 need a break, you let me know.

16 THE COURT: Okay. Go ahead.

17 DIRECT EXAMINATION

18 BY MS. HOLTHUS:

19 Q. Melissa, can you just give me your family

20 tree, brothers, sisters.

21 A. I'm sorry.

22 Q. Your brothers and sisters.

23 A. Yes.

24 Q. How many?

25 A. I have four sisters and one brother.

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

CHRISTOPHER SENA,) No. 79036
)
Appellant,)
)
v.)
)
THE STATE OF NEVADA,)
)
Respondent.)
_____)

APPELLANT’S APPENDIX VOLUME I PAGES 001-250

DARIN IMLAY
Clark County Public Defender
309 South Third Street
Las Vegas, Nevada 89155-2610

Attorney for Appellant

STEVE WOLFSON
Clark County District Attorney
200 Lewis Avenue, 3rd Floor
Las Vegas, Nevada 89155

ADAM LAXALT
Attorney General
100 North Carson Street
Carson City, Nevada 89701-47
(702) 687-3538

Counsel for Respondent

DARIN IMLAY Clark County Public Defender 309 South Third Street Las Vegas, Nevada 89155-2610 Attorney for Appellant	STEVE WOLFSON Clark County District Attorney 200 Lewis Avenue, 3 rd Floor Las Vegas, Nevada 89155 ADAM LAXALT Attorney General 100 North Carson Street Carson City, Nevada 89701-4717 (702) 687-3538 Counsel for Respondent
---	---

I hereby certify that this document was filed electronically with the Nevada Supreme Court on the 20 day of May, 2020. Electronic Service of the foregoing document shall be made in accordance with the Master Service List as follows:

I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage pre-paid, addressed to:

BY /s/ Carrie Connolly
Employee, Clark County Public Defender's Office