

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO  
RANCHO CUCAMONGA DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,	)	
	)	
Plaintiff	)	
	)	
vs.	)	
	)	
Richard Allen Sepe , aka Richard Allen Sepe A, aka Richard A Sepe	)	FELONY COMPLAINT
	)	
Defendant	)	DA CASE NO 2021-00-0007657
	)	

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The undersigned is informed and believes that:

COUNT 1

On or about December 11, 2001 through December 10, 2009, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #1 (DOB: 12/11/96), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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## COUNT 2

On or about December 11, 2001 through December 10, 2009, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #1 (DOB: 12/11/96), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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### COUNT 3

On or about December 11, 2001 through December 10, 2009, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #1 (DOB: 12/11/96), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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#### COUNT 4

On or about December 11, 2001 through December 10, 2009, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #1 (DOB: 12/11/96), a child under the age of fourteen years, with the intent of

arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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#### COUNT 5

On or about December 11, 2001 through December 10, 2009, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members

thereof of Jane Doe #1 (DOB: 12/11/96), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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#### COUNT 6

On or about December 11, 2001 through December 10, 2009, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE

SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #1 (DOB: 12/11/96), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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COUNT 7

On or about July 15, 2006 through July 14, 2008, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #2 (DOB: 07/15/96), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;



the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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### COUNT 8

On or about July 15, 2006 through July 14, 2008, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #2 (DOB: 07/15/96), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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#### COUNT 9

On or about January 1, 2006 through December 31, 2006, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #3 (DOB: 11/02/95), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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#### COUNT 10

On or about January 1, 2006 through December 31, 2006, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #3 (DOB: 11/02/95), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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#### COUNT 11

On or about January 1, 2006 through December 31, 2006, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #3 (DOB: 11/02/95), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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#### COUNT 12

On or about January 1, 2006 through December 31, 2006, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #3 (DOB: 11/02/95), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

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"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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### COUNT 13

On or about June 28, 2002 through June 27, 2003, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #4 (DOB: 06/28/93), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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#### COUNT 14

On or about June 28, 2002 through June 27, 2003, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #4 (DOB: 06/28/93), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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#### COUNT 15

On or about June 28, 2002 through June 27, 2003, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #4 (DOB: 06/28/93), a child under the age of fourteen years, with the intent of



arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

Jane Doe #4 (DOB: 06/28/93), defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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#### COUNT 16

On or about June 28, 2002 through June 27, 2003, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly

commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #4 (DOB: 06/28/93), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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COUNT 17

On or about June 28, 2002 through June 27, 2003, in the above named judicial district, the crime of LEWD ACT UPON A CHILD UNDER AGE 14, in violation of PENAL CODE SECTION 288(a), a felony, was committed by Richard Allen Sepe, who did willfully, unlawfully, and lewdly commit a lewd and lascivious act upon and with the body and certain parts and members thereof of Jane Doe #4 (DOB: 06/28/93), a child under the age of fourteen years, with the intent of arousing, appealing to, and gratifying the lust, passions, and sexual desires of the said defendant(s) and the said child.

"NOTICE: Conviction of this offense will require you to register pursuant to Penal Code section 290. Willful failure to register is a crime."

"NOTICE: Pursuant to Penal Code Section 11166 and 11168, a Suspected Child Abuse Report (SCAR) may have been generated in this case. Penal Code Section 11167 and 11167.5 limit access to a SCAR. A protective order issued by a court is necessary to obtain a copy of the report."

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require the court to order you to submit to a blood test for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency Syndrome (AIDS). Penal Code section 1202.1."

It is further alleged, within the meaning of Penal Code section 667.61(b) and (e), as to defendant Richard Allen Sepe, as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17 that the following circumstances apply: Multiple Victims.

It is further alleged that pursuant to Penal Code section 1170(h)(3) defendant(s) Richard Allen Sepe is eligible for imprisonment in the state prison due to:

the current charge is a serious or violent felony;

defendant(s) Richard Allen Sepe is required to register as a sex offender pursuant to Penal Code section 290;

the crime is not punishable pursuant to Penal Code section 1170(h)(3).

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**NOTICE TO DEFENDANT AND DEFENDANT’S ATTORNEY**

Pursuant to Penal Code Sections 1054.5.(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

**NOTICE TO ATTORNEY**

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 17 COUNT(S).

Executed at Rancho Cucamonga, California, on February 16, 2021.

S. Truesdell  
\_\_\_\_\_  
S. Truesdell  
DECLARANT AND COMPLAINANT

Agency: Rancho Cucamonga Police Dept

Prelim Est. 00:00

Defendant  
Richard Allen Sepe

Birth Date  
08/03/1953

Booking No.  
2102300373

CII No.  
A06530793

NCIC