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SPD-15-335980
M. WILSON, DDA
TEAM: (ASAP)

XRef: 256154

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SACRAMENTO**

THE PEOPLE OF THE STATE OF CALIFORNIA,
vs.

MICHAEL ANTHONY MARTIS,

Defendant.

No. 16FE011239
AMENDED FELONY
COMPLAINT

The People of the State of California upon oath of the undersigned, upon information and belief complain against the defendant above named for the crime(s) as follows:

COUNT ONE

On or about June 11, 2013, or June 12, 2013, at and in the County of Sacramento, State of California, the defendant, MICHAEL ANTHONY MARTIS, did commit a felony, namely: a violation of Section 289(h) of the Penal Code of the State of California, in that said defendant did unlawfully participate in an act of penetration of the genital opening of JANE DOE, under 18 years of age, to wit, 18 years, with a foreign object, substance, instrument, and device and by an unknown object, for the purpose of sexual arousal, gratification, and abuse.

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

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3 **COUNT TWO**

4 For a further and separate cause of action, being a different offense of the same class of crimes
5 and offenses and connected in its commission with the charges set forth in Count One hereof: On
6 or about June 18, 2013, or June 19, 2013, at and in the County of Sacramento, State of California,
7 the defendant, MICHAEL ANTHONY MARTIS, did commit a felony, namely: a violation of
8 Section 261.5(c) of the Penal Code of the State of California, in that said defendant engaged in
9 an act of unlawful sexual intercourse with JANE DOE, age 16 years, not the spouse of the
10 defendant, the minor being more than three years younger than the defendant (first time).
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13 **COUNT THREE**

14 For a further and separate cause of action, being a different offense of the same class of crimes
15 and offenses and connected in its commission with the charges set forth in Counts One and Two
16 hereof: On or about August 1, 2013, at and in the County of Sacramento, State of California, the
17 defendant, MICHAEL ANTHONY MARTIS, did commit a felony, namely: aviolation of
18 Section 288a(b)(1) of the Penal Code of the State of California, in that said defendant did
19 unlawfully participate in an act of oral copulation with JANE DOE, to wit, victim orally
20 copulated defendant, a person under the age of eighteen years, to wit, 16 years.
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23 "NOTICE: Conviction of this offense will require the court to order you to submit to a blood test
24 for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency
25 Syndrome (AIDS). Penal Code Section 1202.1."
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28 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
29 290. Willful failure to register is a crime."
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3 **COUNT FOUR**

4 For a further and separate cause of action, being a different offense of the same class of crimes
5 and offenses and connected in its commission with the charges set forth in Counts One through
6 Three hereof: On or about August 1, 2013, at and in the County of Sacramento, State of
7 California, the defendant, MICHAEL ANTHONY MARTIS, did commit a felony, namely: a
8 violation of Section 288a(b)(1) of the Penal Code of the State of California, in that said
9 defendant did unlawfully participate in an act of oral copulation with JANE DOE, to wit,
10 defendant orally copulated victim, a person under the age of eighteen years, to wit, 16 years.
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13 "NOTICE: Conviction of this offense will require the court to order you to submit to a blood test
14 for evidence of antibodies to the probable causative agent of Acquired Immune Deficiency
15 Syndrome (AIDS). Penal Code Section 1202.1."
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18 "NOTICE: Conviction of this offense will require you to register pursuant to Penal Code Section
19 290. Willful failure to register is a crime."
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21 **COUNT FIVE**

22 For a further and separate cause of action, being a different offense of the same class of crimes
23 and offenses and connected in its commission with the charges set forth in Counts One through
24 Four hereof: On or about and between June 19, 2013, and September 27, 2013, at and in the
25 County of Sacramento, State of California, the defendant, MICHAEL ANTHONY MARTIS, did
26 commit a felony, namely: a violation of Section 261.5(c) of the Penal Code of the State of
27 California, in that said defendant engaged in an act of unlawful sexual intercourse with JANE
28 DOE, age 16 years, not the spouse of the defendant, the minor being more than three years
29 younger than the defendant (different occasion than the first time in Count Two).
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3 **COUNT SIX**

4 For a further and separate cause of action, being a different offense of the same class of crimes
5 and offenses and connected in its commission with the charges set forth in Counts One through
6 Five hereof: On or about and between June 19, 2013, and September 27, 2013, at and in the
7 County of Sacramento, State of California, the defendant, MICHAEL ANTHONY MARTIS, did
8 commit a felony, namely: a violation of Section 261.5(c) of the Penal Code of the State of
9 California, in that said defendant engaged in an act of unlawful sexual intercourse with JANE
10 DOE, age 16 years, not the spouse of the defendant, the minor being more than three years
11 younger than the defendant (different occasion than in Counts Two and Five).
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14 **COUNT SEVEN**

15 For a further and separate cause of action, being a different offense of the same class of crimes
16 and offenses and connected in its commission with the charges set forth in Counts One through
17 Six hereof: On or about and between September 9, 2006, and September 9, 2007, at and in the
18 County of Sacramento, State of California, the defendant, MICHAEL ANTHONY MARTIS, did
19 commit a felony, namely: a violation of Section 261.5(d) of the Penal Code of the State of
20 California, in that said defendant being over the age of 21 years, did engage in an act of unlawful
21 sexual intercourse with MARY DOE, a person under the age of 16 years, to wit, 15 years.
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24 I declare upon information and belief and under penalty of perjury that the foregoing is true and
25 correct.
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27 Executed at Sacramento County, California, the 3rd day of January, 2017.
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32 _____
33 MARIA WILSON
34 SACRAMENTO COUNTY DISTRICT ATTORNEY
35 (916) 874-6218
36 Telephone Number
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41 AB

HOLDING ORDER

_____ It appearing to me that the offense(s) in the within complaint has/have been committed,
and that there is sufficient cause to believe that the defendant, MICHAEL ANTHONY
MARTIS, is guilty thereof,

_____ The defendant, MICHAEL ANTHONY MARTIS, having waived preliminary hearing to
the offense(s) set forth in this complaint,

Exceptions/Additions/Conditions: _____

I order that the defendant be held to answer to same. In my capacity as Judge of the Superior
Court, I deem the within complaint to be an Information and order it filed in the Superior Court.

Date: _____ Dept: _____
Judge of the Superior Court Sitting as Magistrate