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FILED
Superior Court of California,
County of El Dorado
01/20/2026 at 12:34:10 PM
By: John Betonio, Deputy Clerk

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **IN AND FOR THE COUNTY OF EL DORADO**

11 THE PEOPLE OF THE
12 STATE OF CALIFORNIA,

13 Plaintiff,

14 -vs-

15 PAUL VAROFF

16 Defendant(s).

DOCKET #: 26CR0109
DA #: 0273449

CRIMINAL COMPLAINT

AGENCY REPORT #:
EDSO 25-08856

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18 _____/
19 The District Attorney of El Dorado County, based upon information and belief, hereby alleges:

20 **COUNT 1: PC 287(b)(1) (Felony)**

21 On or between January 1, 2023 and January 31, 2023, in the County of **Sacramento**,
22 State of California, the crime of Oral Copulation Of A Person Under 18 in violation of Penal
23 Code section 287(b)(1), a Felony, was committed in that **PAUL VAROFF** did unlawfully
24 participate in an act of oral copulation with J. DOE, a person under the age of eighteen years. *To*
25 *wit: Incident A at the Defendant's home, prior to the hot tub.*

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

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

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5 **COUNT 2: PC 287(b)(1) (Felony)**

6 On or between January 1, 2023 and January 31, 2023, in the County of **Sacramento**,
7 State of California, the crime of Oral Copulation Of A Person Under 18 in violation of Penal
8 Code section 287(b)(1), a Felony, was committed in that **PAUL VAROFF** did unlawfully
9 participate in an act of oral copulation with J. DOE, a person under the age of eighteen years. *To*
10 *wit: Incident B at the Defendant's home, prior to the hot tub.*

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

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

16 **COUNT 3: PC 289(h) (Felony)**

17 On or between January 1, 2023, and February 28, 2023, in the County of **Sacramento**,
18 State of California, the crime of Sexual Penetration of a Person Under 18 in violation of Penal
19 Code section 289(h), a Felony, was committed in that **PAUL VAROFF** committed an act of
20 sexual penetration against J. DOE who was under the age of 18 years. *To wit: Incident C at the*
21 *Defendant's home, prior to the hot tub.*

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

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

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1 **COUNT 4: PC 287(b)(1) (Felony)**

2 On or between February 1, 2023, and August 31, 2023, in the County of **Sacramento**,
3 State of California, the crime of Oral Copulation Of A Person Under 18 in violation of Penal
4 Code section 287(b)(1), a Felony, was committed in that **PAUL VAROFF** did unlawfully
5 participate in an act of oral copulation with J. DOE, a person under the age of eighteen years. *To*
6 *wit: the incident where the Defendant ejaculated in J. DOE's mouth.*

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

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

12 **COUNT 5: PC 289(h) (Felony)**

13 On or between January 1, 2023, and August 31, 2023, in the County of **Sacramento**,
14 State of California, the crime of Sexual Penetration of a Person Under 18 in violation of Penal
15 Code section 289(h), a Felony, was committed in that **PAUL VAROFF** committed an act of
16 sexual penetration against J. DOE who was under the age of 18 years. *To wit: the incident that*
17 *occurred on the same day that the Defendant ejaculated in J. DOE's mouth.*

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

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

23 **COUNT 6: PC 289(h) (Felony)**

24 On or between January 1, 2023 and February 28, 2023, in the County of **El Dorado**, State
25 of California, the crime of Sexual Penetration of a Person Under 18 in violation of Penal Code
26 section 289(h), a Felony, was committed in that **PAUL VAROFF** committed an act of sexual
27 penetration against J. DOE who was under the age of 18 years. *To wit: the incident that occurred*
28 *in the Defendant's office at school.*

1 **COUNT 9: PC 287(b)(1) (Felony)**

2 On or between July 1, 2023 and August 31, 2023, in the County of **Sacramento**, State of
3 California, the crime of Oral Copulation Of A Person Under 18 in violation of Penal Code
4 section 287(b)(1), a Felony, was committed in that **PAUL VAROFF** did unlawfully participate
5 in an act of oral copulation with J. DOE, a person under the age of eighteen years. *To wit: the*
6 *incident after celebrating the Defendant's birthday.*

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

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

12 **COUNT 10: PC 289(h) (Felony)**

13 On or between July 1, 2023, and August 31, 2023, in the County of **Sacramento**, State of
14 California, the crime of Sexual Penetration of a Person Under 18 in violation of Penal Code
15 section 289(h), a Felony, was committed in that **PAUL VAROFF** committed an act of sexual
16 penetration against J. DOE who was under the age of 18 years. *To wit: the incident after*
17 *celebrating the Defendant's birthday.*

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

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

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1 **LOCATION OF CRIME: UNINCORPORATED**

2 **MARSY’S LAW**

3 Information contained in the reports being distributed as discovery in this case may contain
4 confidential information protected by Marsy’s Law and the amendments to the State of California
5 Constitution Section 28. Any victim(s) in any above referenced charge(s) is entitled to be safe and
6 free from intimidation, harassment, and abuse. The defendant(s), defense counsel, and any other
7 person acting on behalf of the defendant(s) is admonished not to use any information contained in
8 the reports to locate or harass any victim or the victim’s family and not to disclose any information
9 that is otherwise privileged and confidential by law. Additionally, it is a misdemeanor violation of
10 Penal Code Section 1054.2(a)(3) to disclose the address or telephone number of a victim or witness
11 to a defendant, defendant’s family member, or anyone else. Note exceptions provided in Penal Code
§ 1054.2(a)(1) and (a)(2).

12 **PENAL CODE SECTION 1054 NOTICE**

13 **Pursuant to Penal Code §1054.5(b)**, the People are hereby informally requesting that
14 defense counsel provide discovery to the People as required by Penal Code § 1054.3 and pursuant to
the provisions of Penal Code § 1054.7.

15 **WARNING: Penal Code § 1054.2** makes it a Misdemeanor Criminal Offense for an
16 attorney receiving discovery to disclose certain confidential information regarding victims and
17 witnesses to defendants and others. Attorneys should review this code section carefully before
18 sharing reports received in discovery with anyone.

19 **NOTICE: PRIOR ACT EVIDENCE - EC 1109, 1108, and 1101(b)**

20 The People intend to present any and all discovered evidence that qualifies under California
21 Evidence Code Sections 1109, 1108, and/or 1101(b) at any contested hearing(s) in the above-
captioned case.

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