STATE OF INDIANA

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IN TIPPECANOE SUPERIOR COURT 3

TIPPECANOE COUNTY

CAUSE NO:

79D03-2105-JD-000056

IN THE MATTER OF:

(43487) $\times \times \times \times \times \times \times \times \times \times$

A Child Alleged to be a Delinquent Child

ADDRESS:

XX	XXX	\times		
West	Lafayette,	ĪN	4790	6

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VERIFIED PETITION ALLEGING DELINQUENCY

State, by Deputy Prosecuting Attorney, alleges the following:

The Court has jurisdiction in this proceeding pursuant to IC 31-30-1-1.

The name and residence address of the child's Parent(s)/Guardian(s)/Custodian(s) are:



West Lafayette, IN 47906

The child is a delinquent child as defined in IC 31-37 in that, in Tippecanoe County, State of Indiana, the child committed the following act(s):

Count 1 Child Molesting, Level 4 Felony I.C. 35-42-4-3(b)

> Between March 25, 2019 and March 23, 2020, said child did with Victim 1, a child under fourteen (14) years of age, to wit: nine (9) years of age, perform or submit to fondling or touching with intent to arouse or satisfy the sexual desires of Victim 1

Count 2 Child Molesting, Level 3 Felony I.C. 35-42-4-3(a)

> Sometime during 2019 - 2020, said child did knowingly or intentionally perform or submit to sexual intercourse or other sexual conduct with Victim 2, a child under fourteen (14) years of age, to wit: between five (5) and six (6) years of age.

Count 3 Child Molesting, Level 4 Felony I.C. 35-42-4-3(b)

Between January 1, 2020 and May 17, 2020, said child did with Victim 3, a child under fourteen (14) years of age, to wit: six (6) years of age, perform or submit to fondling or touching with intent to arouse or satisfy the sexual desires of for the sexual desires of the sexual desires

Count 4 Child Molesting, Level 4 Felony I.C. 35-42-4-3(b)

Sometime during 2018 - 2020, said child did with Victim 4, a child under fourteen (14) years of age, to wit: between five (5) and seven (7) years of age, perform or submit to fondling or touching with intent to arouse or satisfy the sexual desires of victim 4.

Count 5 Child Molesting, Level 3 Felony I.C. 35-42-4-3(a)

Between September 8, 2019 and January 7, 2021, said child did knowingly or intentionally perform or submit to sexual intercourse or other sexual conduct with Victim 5, a child under fourteen (14) years of age, to wit: five (5) years of age.

Count 6 Child Molesting, Level 3 Felony I.C. 35-42-4-3(a)

Sometime during 2017 - 2020, said child did knowingly or intentionally perform or submit to sexual intercourse or other sexual conduct with Victim 6, a child under fourteen (14) years of age, to wit: between seven (7) and ten (10) years of age.

Count 7 Child Molesting, Level 3 Felony I.C. 35-42-4-3(a)

Sometime during November 2019 - October 2020, said child did knowingly or intentionally perform or submit to sexual intercourse or other sexual conduct with Victim 7, a child under fourteen (14) years of age, to wit: ten (10) years of age.

All of which is contrary to the form of the statute in such cases made and provided and against the peace and dignity of the State of Indiana.

WHEREFORE, State requests a hearing to determine if said child is a delinquent child, and for all other just and proper relief.

I hereby affirm, under the penalties of perjury, that the foregoing representations are true and accurate to the best of my knowledge and belief.