

IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
IN AND FOR SEMINOLE COUNTY, FLORIDA

STATE OF FLORIDA

VS.

CASE NUMBER: 592015CF001678AXXXXX

RICARDO GUILLERMO POMBO-FOSTER

AMENDED INFORMATION

- COUNT 1: LEWD OR LASCIVIOUS BATTERY (F2) 800.04(4)(a)
COUNT 2: LEWD OR LASCIVIOUS BATTERY (F2) 800.04(4)(a)
COUNT 3: LEWD OR LASCIVIOUS BATTERY (F2) 800.04(4)(a)
COUNT 4: LEWD OR LASCIVIOUS BATTERY (F2) 800.04(4)(a)
COUNT 5: LEWD OR LASCIVIOUS BATTERY (F2) 800.04(4)(a)
COUNT 6: LEWD OR LASCIVIOUS BATTERY (F2) 800.04(4)(a)
COUNT 7: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
COUNT 8: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
COUNT 9: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
COUNT 10: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
COUNT 11: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
COUNT 12: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
COUNT 13: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
COUNT 14: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
COUNT 15: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
COUNT 16: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
COUNT 17: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
COUNT 18: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
COUNT 19: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
COUNT 20: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
COUNT 21: PROMOTING A SEXUAL PERFORMANCE BY A CHILD (F2) 827.071(3)
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COUNT 23: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
(F3) 827.071(5)
COUNT 24: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
(F3) 827.071(5)
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COUNT 27: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
(F3) 827.071(5)
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- COUNT 29: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
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- COUNT 30: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
(F3) 827.071(5)
- COUNT 31: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
(F3) 827.071(5)
- COUNT 32: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
(F3) 827.071(5)
- COUNT 33: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
(F3) 827.071(5)
- COUNT 34: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
(F3) 827.071(5)
- COUNT 35: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
(F3) 827.071(5)
- COUNT 36: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
(F3) 827.071(5)
- COUNT 37: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
(F3) 827.071(5)
- COUNT 38: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
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- COUNT 39: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
(F3) 827.071(5)
- COUNT 40: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
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- COUNT 41: POSSESSION OF MATERIAL DEPICTING SEXUAL CONDUCT BY A CHILD
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IN THE NAME AND BY AUTHORITY OF THE STATE OF FLORIDA, PHIL ARCHER, STATE ATTORNEY, THROUGH THE UNDERSIGNED DESIGNATED ASSISTANT STATE ATTORNEY, CHARGES THAT:

COUNT 1: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on one or more occasions on one or more occasions on or between October 31, 2013 and November 30, 2014, RICARDO GUILLERMO POMBO-FOSTER did engage in sexual activity with a person twelve years of age or older but less than 16 years of age, [REDACTED] 13 or 14, by causing his penis to penetrate of have union with [REDACTED]; vagina, contrary to Section 800.04(4)(a), Florida Statutes,

COUNT 2: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or between October 31, 2013 and November 30, 2014, RICARDO GUILLERMO POMBO-FOSTER did engage in sexual activity with a person twelve years of age or older but less than 16 years of age, [REDACTED] 13 or 14, by causing his mouth or tongue to penetrate or have union with [REDACTED] vagina, contrary to Section 800.04(4)(a), Florida Statutes,

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COUNT 3: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on one or more occasions on or between May 31, 2014 and August 31, 2014, RICARDO GUILLERMO POMBO-FOSTER did engage in sexual activity with a person twelve years of age or older but less than 16 years of age, [REDACTED] [REDACTED], 15, by causing his penis to penetrate or have union with [REDACTED]; mouth or tongue, contrary to Section 800.04(4)(a), Florida Statutes,

COUNT 4: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on one or more occasions on or between May 31, 2014 and August 31, 2014, RICARDO GUILLERMO POMBO-FOSTER did engage in sexual activity with a person twelve years of age or older but less than 16 years of age, [REDACTED] [REDACTED], 15, by causing his mouth or tongue to penetrate or have union with [REDACTED]; vagina, contrary to Section 800.04(4)(a), Florida Statutes,

COUNT 5: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on one or more occasions on or between May 31, 2014 and August 31, 2014, RICARDO GUILLERMO POMBO-FOSTER did engage in sexual activity with a person twelve years of age or older but less than 16 years of age, [REDACTED] [REDACTED], 15, by causing his penis to penetrate or have union with [REDACTED] [REDACTED]; vagina, contrary to Section 800.04(4)(a), Florida Statutes,

COUNT 6: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on one or more occasions on or between May 31, 2014 and August 31, 2014, RICARDO GUILLERMO POMBO-FOSTER did engage in sexual activity with a person twelve years of age or older but less than 16 years of age, [REDACTED] [REDACTED], 15, by causing his penis to penetrate or have union with [REDACTED] [REDACTED] anus, contrary to Section 800.04(4)(a), Florida Statutes,

COUNT 7: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or between May 31, 2014 and August 31, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: oral sex, knowing the character and content thereof, which includes sexual conduct by a child, to wit: [REDACTED] [REDACTED], a child 15 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 8: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or between May 31, 2014 and August 31, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: sexual intercourse, knowing the character and content thereof, which includes sexual conduct by a child, to wit: [REDACTED] [REDACTED] a child 15 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 9: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or between May 31, 2014 and August 31, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: anal intercourse, knowing the character and content thereof,

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which includes sexual conduct by a child, to wit: [REDACTED] [REDACTED] a child 15 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 10: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or between May 31, 2014 and August 31, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: sexual intercourse, knowing the character and content thereof, which includes sexual conduct by a child, to wit: [REDACTED] [REDACTED] a child 15 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 11: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about August 30, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: sexual intercourse, knowing the character and content thereof, which includes sexual conduct by a child, to wit: [REDACTED], a child 15 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 12: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or between May 31, 2014 and August 31, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: oral sex, knowing the character and content thereof, which includes sexual conduct by a child, to wit: [REDACTED] a child 15 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 13: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or between May 31, 2014 and August 31, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: sexual intercourse, knowing the character and content thereof, which includes sexual conduct by a child, to wit: [REDACTED] [REDACTED] a child 15 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 14: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or between May 31, 2014 and August 31, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: rubbing [REDACTED] vagina, knowing the character and content thereof, which includes sexual conduct by a child, to wit: [REDACTED] [REDACTED], a child 15 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 15: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or between May 31, 2014 and August 31, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: oral sex, knowing the character and content thereof, which includes sexual conduct by a child, to wit: [REDACTED] a child 15 years of age, contrary to Section 827.071(3), Florida Statutes,

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COUNT 16: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or between October 31, 2013 and November 30, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: digital penetration and sexual intercourse, knowing the character and content thereof, which includes sexual conduct by a child, to wit: [REDACTED] [REDACTED] a child 13 or 14 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 17: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or between October 31, 2013 and November 30, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: digital penetration and sexual intercourse, knowing the character and content thereof, which includes sexual conduct by a child, to wit: [REDACTED] [REDACTED] a child 13 or 14 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 18: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or between October 31, 2013 and August 31, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: sexual intercourse, knowing the character and content thereof, which includes sexual conduct by a child, to wit: [REDACTED] [REDACTED] a child 13 or 14 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 19: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about November 1, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: digital penetration, knowing the character and content thereof, which includes sexual conduct by a child, to wit: [REDACTED] [REDACTED] a child 13 or 14 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 20: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about November 1, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: rubbing [REDACTED] [REDACTED]; vagina, knowing the character and content thereof, which includes sexual conduct by a child, to wit: [REDACTED] [REDACTED] a child 13 or 14 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 21: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about November 1, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: sexual intercourse, knowing the character and content thereof, which includes sexual conduct by a child, to wit: [REDACTED] [REDACTED] a child 13 or 14 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 22: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about November 1, 2014, RICARDO GUILLERMO POMBO-FOSTER, did produce, direct, or promote a performance, to wit: oral sex, knowing the character and content thereof, which includes sexual

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conduct by a child, to wit: [REDACTED] a child 13 or 14 years of age, contrary to Section 827.071(3), Florida Statutes,

COUNT 23: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about August 8, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_1965.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 24: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about August 8, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_1966.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 25: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about November 1, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_1057.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 26: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about November 1, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_1058.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or

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sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 27: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about November 1, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_1059.MOV , which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 28: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about November 1, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_1060.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 29: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about August 30, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_2127.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 30: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about November 13, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_1212.MOV, which, in whole or in part,

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RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 31: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about November 13, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_1214.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 32: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about August 14, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_2015.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 33: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about August 15, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_2025.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 34: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about August 15, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or

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intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_2027.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 35: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about August 30, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_2118.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 36: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about August 30, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_2119.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 37: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about August 30, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_2120.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

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COUNT 38: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about August 30, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_2121.MOV , which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 39: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about August 30, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_2122.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 40: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about August 30, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_2123.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

COUNT 41: IN THE COUNTY OF SEMINOLE, STATE OF FLORIDA, on or about August 30, 2014, RICARDO GUILLERMO POMBO-FOSTER, did knowingly possess control, or intentionally view a photograph, motion picture, exhibition, show, representation, image, data, computer depiction, or other presentation, to wit: IMG_2124.MOV, which, in whole or in part, RICARDO GUILLERMO POMBO-FOSTER knew to include sexual conduct by a child, to wit: actual or simulated sexual intercourse, deviate sexual intercourse, masturbation, or sadomasochistic abuse; actual lewd exhibition of the genitals; actual physical contact with a person's clothed or unclothed genitals, pubic area, or if such person is a female, breast, with the intent to arouse or gratify the sexual desire of either party; or any act or conduct which

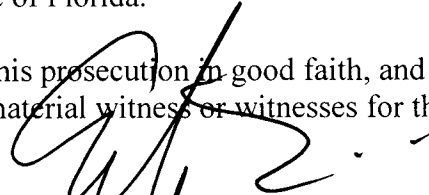
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constitutes sexual battery or simulates that sexual battery is being or will be committed, contrary to Section 827.071(5), Florida Statutes,

AND against the peace and dignity of the State of Florida.

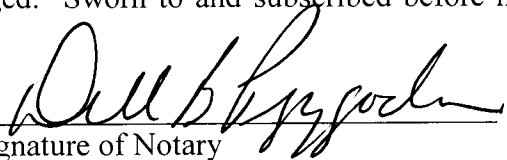
I hereby state under oath that I am instituting this prosecution in good faith, and I certify that I have received testimony under oath from the material witness or witnesses for the offense(s).



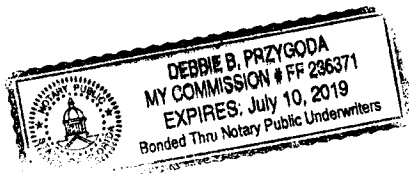
Designated Assistant State Attorney
Eighteenth Judicial Circuit
Florida Bar No. 0884707

Personally appeared before me, Designated Assistant State Attorney EUGENE A. FELICIANI, who is personally known to me, who being first duly sworn, says that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense(s), and says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true and which, if true, would constitute the offense(s) therein charged. Sworn to and subscribed before me this

19th day of February, 2019.



Signature of Notary



Print, Type or Stamp Name of Notary