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13 SUPERIOR COURT OF CALIFORNIA
14 COUNTY OF SACRAMENTO

15
16 THE PEOPLE OF THE STATE OF CALIFORNIA,
17 vs.
18 DANIEL RATNER (09694647-01),

12607437

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20 Defendant(s).
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22 The People of the State of California upon oath of the undersigned, upon information and belief
23 complain against the defendant(s) above named for the crime(s) as follows:
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25 COUNT ONE

26 On or about October 19, 2012, at and in the County of Sacramento, State of California, defendant(s)
27 DANIEL RATNER did commit a felony namely: a violation of Section 243.4(b) of the Penal
28 Code of the State of California, in that said defendant did willfully and unlawfully touch an intimate
29 part of JANE DOE #1, to wit vaginal area, while said person was institutionalized for medical
30 treatment and was seriously disabled and medically incapacitated, against the will of said person
31 and for the purpose of sexual arousal, sexual gratification, and sexual abuse.

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

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Count One hereof: On or about October 19, 2012, at and in the County of Sacramento, State of California, defendant(s) DANIEL RATNER did commit a felony namely: a violation of Section 243.4(a) of the Penal Code of the State of California, in that said defendant did willfully and unlawfully touch an intimate part of JANE DOE #1, to wit, breast, while said person was unlawfully restrained by said defendant(s) and an accomplice, against the will of said person and for the purpose of sexual arousal, sexual gratification, and sexual abuse.

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

COUNT THREE

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One and Two hereof: On or about and between August 01, 2012, and November 15, 2012, at and in the County of Sacramento, State of California, defendant(s) DANIEL RATNER did commit a felony namely: a violation of Section 311.11(a) of the Penal Code of the State of California, in that said defendant did unlawfully and knowingly possess and control matter depicting a person under the age of 18 years personally engaging in and simulating sexual conduct as defined in Penal Code Section 311.4(d).

COUNT FOUR

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Three hereof: On or about and between August 01, 2012, and November 15, 2012, at and in the County of Sacramento, State of California, defendant(s) DANIEL RATNER did commit a felony namely: a violation of Section 311.11(a) of the Penal Code of the State of California, in that said defendant did unlawfully and knowingly possess and control matter depicting a person under the age of 18 years personally engaging in and simulating sexual conduct as defined in Penal Code Section 311.4(d).

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COUNT FIVE

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Four hereof: On or about and between August 01, 2012, and November 15, 2012, at and in the County of Sacramento, State of California, defendant(s) DANIEL RATNER did commit a felony namely: a violation of Section 311.11(a) of the Penal Code of the State of California, in that said defendant did unlawfully and knowingly possess and control matter depicting a person under the age of 18 years personally engaging in and simulating sexual conduct as defined in Penal Code Section 311.4(d).

COUNT SIX

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Five hereof: On or about and between August 01, 2012, and November 15, 2012, at and in the County of Sacramento, State of California, defendant(s) DANIEL RATNER did commit a felony namely: a violation of Section 311.11(a) of the Penal Code of the State of California, in that said defendant did unlawfully and knowingly possess and control matter depicting a person under the age of 18 years personally engaging in and simulating sexual conduct as defined in Penal Code Section 311.4(d).

COUNT SEVEN

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charges set forth in Counts One through Six hereof: On or about and between August 01, 2012, and November 15, 2012, at and in the County of Sacramento, State of California, defendant(s) DANIEL RATNER did commit a misdemeanor namely: a violation of Section 647(j)(3)(A) of the Penal Code of the State of California, in that said defendant did willfully and unlawfully use a concealed camcorder, motion picture camera, and photographic camera of any type to secretly videotape, film, photograph, and record by electronic means, another, identifiable person who may be in a state of full or partial undress, for the purposes of viewing the body of, and the undergarments worn by, that other person, without the consent or knowledge of that other person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room and tanning booth, and the interior of any other area in which that other person has reasonable expectation of privacy, with the intent to invade the privacy of that other person.

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4 **COUNT EIGHT**

5 For a further and separate cause of action, being a different offense of the same class of crimes and
6 offenses as the charges set forth in Counts One through Seven hereof: On or about and between
7 August 01, 2012, and November 15, 2012, at and in the County of Sacramento, State of California,
8 defendant(s) DANIEL RATNER did commit a misdemeanor namely: a violation of Section
9 647(j)(3)(A) of the Penal Code of the State of California, in that said defendant did willfully and
10 unlawfully use a concealed camcorder, motion picture camera, and photographic camera of any
11 type to secretly videotape, film, photograph, and record by electronic means, another, identifiable
12 person who may be in a state of full or partial undress, for the purposes of viewing the body of, and
13 the undergarments worn by, that other person, without the consent or knowledge of that other
14 person, in the interior of a bedroom, bathroom, changing room, fitting room, dressing room and
15 tanning booth, and the interior of any other area in which that other person has reasonable
16 expectation of privacy, with the intent to invade the privacy of that other person.
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18 I declare upon information and belief and under penalty of perjury that the foregoing is true and
19 correct.
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21 Executed at Sacramento County, California, the 3rd day of December, 2012.
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25 _____
26 Declarant
27 SACRAMENTO COUNTY DISTRICT ATTORNEY

28 (916) 874-6218
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