

CLASSIFICATION: FELONY

STATE OF FLORIDA

IN THE CIRCUIT COURT OF THE SEVENTH
JUDICIAL CIRCUIT, IN AND FOR FLAGLER
COUNTY, FLORIDA, IN THE YEAR TWO
THOUSAND FIFTEEN

VS.

CASE NO: 15-00302-CFFA

AGENCY: FDLEJAX/JA-20-0076

ERIN MARIE VICKERS

W/F; DOB: 07/21/1994 SS# [REDACTED]

THIRD AMENDED INFORMATION

CHARGE(S):

- I) SEXUAL BATTERY ON PERSON LESS THAN 12 YEARS OF AGE
- II) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- III) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- IV) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- V) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- VI) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- VII) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- VIII) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- IX) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- X) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- XI) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- XII) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- XIII) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- XIV) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- XV) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- XVI) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- XVII) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- XVIII) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- XIX) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- XX) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- XXI) PROMOTING SEXUAL PERFORMANCE BY A CHILD
- XXII) TRANSMISSION OF CHILD PORNOGRAPHY
- XXIII) TRANSMISSION OF CHILD PORNOGRAPHY
- XXIV) TRANSMISSION OF CHILD PORNOGRAPHY
- XXV) TRANSMISSION OF CHILD PORNOGRAPHY
- XXVI) TRANSMISSION OF CHILD PORNOGRAPHY
- XXVII) TRANSMISSION OF CHILD PORNOGRAPHY
- XXVIII) TRANSMISSION OF CHILD PORNOGRAPHY
- XXIX) TRANSMISSION OF CHILD PORNOGRAPHY
- XXX) TRANSMISSION OF CHILD PORNOGRAPHY
- XXXI) TRANSMISSION OF CHILD PORNOGRAPHY
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- XXXVI) TRANSMISSION OF CHILD PORNOGRAPHY
- XXXVII) TRANSMISSION OF CHILD PORNOGRAPHY
- XXXVIII) TRANSMISSION OF CHILD PORNOGRAPHY
- XXXIX) TRANSMISSION OF CHILD PORNOGRAPHY
- XL) TRANSMISSION OF CHILD PORNOGRAPHY
- XLI) TRANSMISSION OF CHILD PORNOGRAPHY
- XLII) CONSPIRACY TO COMMIT SEXUAL BATTERY ON PERSON LESS THAN 12 YEARS OF AGE

- XLIII) CONSPIRACY TO COMMIT SEXUAL BATTERY ON PERSON LESS THAN 12 YEARS OF AGE
- XLIV) CONSPIRACY TO COMMIT SEXUAL BATTERY ON PERSON LESS THAN 12 YEARS OF AGE
- XLV) SEXUAL BATTERY ON PERSON LESS THAN 12 YEARS OF AGE
- XLVI) SEXUAL BATTERY ON PERSON LESS THAN 12 YEARS OF AGE
- XLVII) SEXUAL BATTERY ON PERSON LESS THAN 12 YEARS OF AGE
- XLVIII) SEXUAL BATTERY ON PERSON LESS THAN 12 YEARS OF AGE
- XLIX) CONSPIRACY TO COMMIT SEXUAL BATTERY ON PERSON LESS THAN 12 YEARS OF AGE

R.J. LARIZZA, State Attorney for the Seventh Judicial Circuit of the State of Florida and as such prosecuting attorney for this Court, in the name of and by the authority of the State of Florida charges that:

COUNT I: ERIN MARIE VICKERS on or about February 26, 2015, in the County of FLAGLER and State of Florida, ERIN MARIE VICKERS, a person eighteen years of age or older, did unlawfully commit sexual battery upon A.V., or injure the sexual organs during an attempt to commit sexual battery upon A.V., a person less than twelve years of age, by penetrating A.V.'s vagina with her tongue or causing her mouth to have contact with A.V.'s vagina, contrary to Florida Statute 794.011(2)(a). (CAPITAL FELONY)

COUNT II: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: 0b33e6bba56c41116818b6ec724727dc896d3afb

COUNT III: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: 0e7e51c1c91f372d2e70682dd763ac212a0da37a

COUNT IV: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: 1fb0ec70685fc84015a299f0111fceed910da91e

COUNT V: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: 24ea84e104359ec56bcd57989f6987d8bbaa5116

COUNT VI: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: 27af9465866efa864ff412383e7b1a14eae84125

COUNT VII: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: 2bbdd1f261204bc0cac521061196d00f2d14436f

COUNT VIII: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a

photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: 36adf1e66edc30e80fca697fe100638bbd678e0a

COUNT IX: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: eb84aa5689de3605ff197b903406e2c2a4abcfe8

COUNT X: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: 64d0ed8b75cfdc3b095faed109e765257ecb07de

COUNT XI: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: 696063d66ee08bb5e01268935d37169a316715c2

COUNT XII: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: 82cbf2da282dbcbeafac01c7305e073e4c2ffbeb6

COUNT XIII: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: 8b376af09098997bfab24fa33706788bcfa98d69

COUNT XIV: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: c80e4a9a5e69040aef990b3d68539a7bf0823677

COUNT XV: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: d715b4391e9012032d10d7d767a2d2924bbd3282

COUNT XVI: IN THAT ERIN MARIE VICKERS, on or between January 27, 2014 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: imgcache.1_embedded_2068.jpg

COUNT XVII: IN THAT ERIN MARIE VICKERS, on or between January 27, 2014 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a

photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: imgcache.1_embedded_2105.jpg

COUNT XVIII: IN THAT ERIN MARIE VICKERS, on or between January 27, 2014 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: imgcache.1_embedded_2109.jpg

COUNT XIX: IN THAT ERIN MARIE VICKERS, on or between January 27, 2014 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a photograph depicting the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

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COUNT XX: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a video depicting oral penetration or contact with the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: CAM01016.mp4

COUNT XXI: IN THAT ERIN MARIE VICKERS, on or between February 22, 2015 and February 23, 2015, in the County of FLAGLER and State of Florida, did produce, direct or promote a sexual performance, to wit: a video depicting oral penetration or contact with the vagina of a child less than 18 years of age, while knowing the character and content thereof, contrary to Florida Statute 827.071(3) and 775.0847. (1 DEG FELONY)(DIRECT FILE)

File Name: video-1424636623.mp4

COUNT XXII: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: 0b33e6bba56c41116818b6ec724727dc896d3afb

COUNT XXIII: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: 0e7e51c1c91f372d2e70682dd763ac212a0da37a

COUNT XXIV: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: 1fb0ec70685fc84015a299f0111fceed910da91e

COUNT XXV: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: 24ea84e104359ec56bcd57989f6987d8bbaa5116

COUNT XXVI: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: 27af9465866efa864ff412383e7b1a14eae84125

COUNT XXVII: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: 2bbdd1f261204bc0cac521061196d00f2d14436f

COUNT XXVIII: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: 36adf1e66edc30e80fca697fe100638bbd678e0a

COUNT XXIX: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: eb84aa5689de3605ff197b903406e2c2a4abcfe8

COUNT XXX: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: 64d0ed8b75cfdc3b095faed109e765257ecb07de

COUNT XXXI: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: 696063d66ee08bb5e01268935d37169a316715c2

COUNT XXXII: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: 82cbf2da282dbcbefac01c7305e073e4c2ffbeb6

COUNT XXXIII: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: 8b376af09098997bfab24fa33706788bcfa98d69

COUNT XXXIV: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: c80e4a9a5e69040aef990b3d68539a7bf0823677

COUNT XXXV: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: d715b4391e9012032d10d7d767a2d2924bbd3282

COUNT XXXVI: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

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COUNT XXXVII: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: imgcache.1_embedded_2105.jpg

COUNT XXXVIII: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: imgcache.1_embedded_2109.jpg

COUNT XXXIX: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: imgcache.1_embedded_2066.jpg

COUNT XL: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: CAM01016.mp4

COUNT XLI: IN THAT ERIN MARIE VICKERS on or between February 22, 2015 and March 26, 2015, in the County of FLAGLER and State of Florida, did transmit child pornography, as defined in s. 847.001, to PAUL KEVIN DYKES, JR., contrary to Florida Statute 847.0137(2) and 775.0847. (2 DEG FELONY)(DIRECT FILE)

File Name: video-1424636623.mp4

COUNT XLII: IN THAT ERIN MARIE VICKERS on or between March 7, 2015 and March 8, 2015, in the County of FLAGLER and State of Florida, ERIN MARIE VICKERS, did conspire, combine, or confederate with PAUL KEVIN DYKES, JR. to commit sexual battery on a child under twelve by a person over eighteen, to wit; commit sexual battery upon A.V., contrary to Florida Statute 794.011(2)(a) and 777.04. (1 DEG FELONY) (DIRECT FILE)

COUNT XLIII: IN THAT ERIN MARIE VICKERS on or about March 23, 2015, in the County of FLAGLER and State of Florida, ERIN MARIE VICKERS, did conspire, combine, or confederate with PAUL KEVIN DYKES, JR. to commit sexual battery on a child under twelve by a person over eighteen, to wit; penetrate A.V.'s vagina with a dog's penis and/or a child's penis and/or a sex toy and/or a man's penis, contrary to Florida Statute 794.011(2)(a) and 777.04. (1 DEG FELONY) (DIRECT FILE)

COUNT XLIV: IN THAT ERIN MARIE VICKERS on or between February 26, 2015 and February 27, 2015, in the County of FLAGLER and State of Florida, ERIN MARIE VICKERS, did conspire, combine, or confederate with PAUL KEVIN DYKES, JR. to commit sexual battery on a child under twelve by a person over eighteen, to wit; commit sexual battery upon I.D., contrary to Florida Statute 794.011(2)(a) and 777.04. (1 DEG FELONY) (DIRECT FILE)

COUNT XLV: ERIN MARIE VICKERS on or about February 22, 2015, in the County of FLAGLER and State of Florida, ERIN MARIE VICKERS, a person eighteen years of age or older, did unlawfully commit sexual battery upon A.V., or injure the sexual organs during an attempt to commit sexual battery upon A.V., a person less than twelve years of age, by penetrating A.V.'s vagina with her tongue or causing her mouth to have contact with A.V.'s vagina, contrary to Florida Statute 794.011(2)(a). (CAPITAL FELONY) (DIRECT FILE)

COUNT XLVI: ERIN MARIE VICKERS on or about February 27, 2015, in the County of FLAGLER and State of Florida, ERIN MARIE VICKERS, a person eighteen years of age or older, did unlawfully commit sexual battery upon A.V., or injure the sexual organs during an attempt to commit sexual battery upon A.V., a person less than twelve years of age, by penetrating A.V.'s vagina with her tongue or causing her mouth to have contact with A.V.'s vagina, contrary to Florida Statute 794.011(2)(a). (CAPITAL FELONY) (DIRECT FILE)

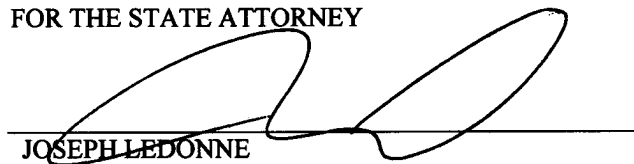
COUNT XLVII: ERIN MARIE VICKERS on or between March 7, 2015 and March 8, 2015, in the County of FLAGLER and State of Florida, ERIN MARIE VICKERS, a person eighteen years of age or older, did unlawfully

commit sexual battery upon A.V., or injure the sexual organs during an attempt to commit sexual battery upon A.V., a person less than twelve years of age, by penetrating A.V.'s vagina with her tongue or causing her mouth to have contact with A.V.'s vagina, contrary to Florida Statute 794.011(2)(a). (CAPITAL FELONY) (DIRECT FILE)

COUNT XLVIII: ERIN MARIE VICKERS on or about March 10, 2015, in the County of FLAGLER and State of Florida, ERIN MARIE VICKERS, a person eighteen years of age or older, did unlawfully commit sexual battery upon A.V., or injure the sexual organs during an attempt to commit sexual battery upon A.V., a person less than twelve years of age, by penetrating A.V.'s vagina with her finger, contrary to Florida Statute 794.011(2)(a). (CAPITAL FELONY) (DIRECT FILE)

COUNT XLIX: IN THAT ERIN MARIE VICKERS on or between March 10, 2015 and March 11, 2015, in the County of FLAGLER and State of Florida, ERIN MARIE VICKERS, did conspire, combine, or confederate with PAUL KEVIN DYKES, JR. to commit sexual battery on a child under twelve by a person over eighteen, to wit; commit sexual battery upon A.V., contrary to Florida Statute 794.011(2)(a) and 777.04. (1 DEG FELONY) (DIRECT FILE)

FOR THE STATE ATTORNEY



JOSEPH LEDONNE
ASSISTANT STATE ATTORNEY
SEVENTH JUDICIAL CIRCUIT OF THE
STATE OF FLORIDA
BAR NUMBER: 101529

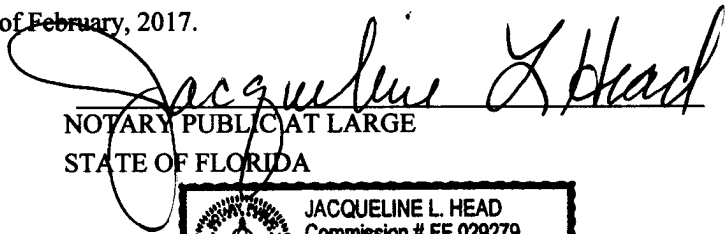
COUNTY OF FLAGLER

STATE OF FLORIDA

Personally appeared before me JOSEPH LEDONNE, Assistant State Attorney, for the Seventh Judicial Circuit of the State of Florida, known to me to be the foregoing prosecuting officer, who being duly sworn, says that the allegations 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 therein charged. Subscribed in good faith. Said facts based on testimony of material witnesses.

SWORN to and subscribed before me this 21st day of February, 2017.

Submitted to the Clerk of the CIRCUIT Court, Seventh Judicial Circuit, in and For FLAGLER County, Florida, on the 21st day of February, 2017.



NOTARY PUBLIC AT LARGE
STATE OF FLORIDA

