

INDICTMENT

NEW SOUTH WALES

On 22nd November 2004, the Director of Public Prosecutions on behalf of Her Majesty charges that

VICTOR MAKAROV

1. Between 10 April 2002 and 1 August 2002 at Pymble, in the State of New South Wales, in circumstances of aggravation, did commit an act of indecency towards CAA, a person then under the age of 16 years, namely 13 years, when CAA was under the authority of Victor Makarov.

AND The Director Of Public Prosecutions FURTHER CHARGES that

VICTOR MAKAROV

2. Between 30 June 2002 and 1 January 2003 at Neutral Bay, in the State of New South Wales, in circumstances of aggravation did assault CAA, a person under the age of 16 years, namely 13 years, and at the time of the assault did commit an act of indecency on CAA.

AND The Director Of Public Prosecutions FURTHER CHARGES that

VICTOR MAKAROV

3. Between 1 January 2003 and 1 July 2003 at Neutral Bay, in the State of New South Wales, in circumstances of aggravation did assault CAA, a person under the age of 16 years, namely 13 years or 14 years, and at the time of the assault did commit an act of indecency on CAA.

AND The Director Of Public Prosecutions FURTHER CHARGES that

VICTOR MAKAROV

4. Between 1 January 2003 and 31 August 2003 at Pymble, in the State of New South Wales, in circumstances of aggravation did assault [CAA], a person under the age of 16 years, namely 13 or 14 years, and at the time of the assault did commit an act of indecency on [CAA]

AND The Director Of Public Prosecutions FURTHER CHARGES that

VICTOR MAKAROV

5. Between 1 January 2003 and 31 August 2003 at Pymble, in the State of New South Wales, in circumstances of aggravation did assault [CAA], a person under the age of 16 years, namely 13 or 14 years, and at the time of the assault did commit an act of indecency on [CAA]

AND The Director Of Public Prosecutions FURTHER CHARGES that

VICTOR MAKAROV

6. Between 1 January 2003 and 31 August 2003 at Pymble, in the State of New South Wales, in circumstances of aggravation did assault [CAA], a person under the age of 16 years, namely 13 or 14 years, and at the time of the assault did commit an act of indecency on [CAA]

AND The Director Of Public Prosecutions FURTHER CHARGES that

VICTOR MAKAROV

7. Between 1 August 2003 and 30 September 2003 at Pymble, in the State of New South Wales, in circumstances of aggravation did commit an act of indecency towards [CAA], a person under the age of 16 years, namely 14 years, when [CAA] was under the authority of Victor Makarov.

AND The Director Of Public Prosecutions FURTHER CHARGES that

VICTOR MAKAROV

8. Between 1 August 2003 and 30 September 2003 at Pymble, in the State of New South Wales, in circumstances of aggravation did have sexual intercourse with CAA [redacted] without the consent of CAA [redacted], a person under the age of 16 years, namely 14 years, knowing that CAA [redacted] did not consent to the sexual intercourse.

AND The Director Of Public Prosecutions FURTHER CHARGES IN THE ALTERNATIVE that

VICTOR MAKAROV

9. Between 1 August 2003 and 30 September 2003 at Pymble, in the State of New South Wales, in circumstances of aggravation did have sexual intercourse with CAA [redacted], a person of the age of 14 years, when CAA [redacted] was under the authority of Victor Makarov.

P. Adey

Crown Prosecutor

On behalf of the Director of Public Prosecutions