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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF SACRAMENTO

14 **THE PEOPLE OF THE STATE OF**
15 **CALIFORNIA,**

16 Plaintiff,

17 v.

18 **PAUL ANTHONY GREGORIO**
19 **(DOB: [REDACTED]; Xref: [REDACTED])**

20 **XUAN PHI NGUYEN**
21 **(DOB: [REDACTED]; Xref: [REDACTED])**

21 Defendants.

Case No.

FELONY COMPLAINT

22 The Attorney General of the State of California by this complaint hereby accuses
23 Defendants PAUL ANTHONY GREGORIO and XUAN PHI NGUYEN of the following
24 offenses:

25 **COUNT ONE**
26 **(PANDERING)**

27 On or about and between April 23, 2020 to June 5, 2020, in the County of Sacramento,
28 defendants PAUL ANTHONY GREGORIO and XUAN PHI NGUYEN committed the crime of

1 PANDERING, in violation of PENAL CODE SECTION 266i(a)(3), a Felony, in that they did
2 unlawfully procure a place for S. D. aka [REDACTED] another person, in a house of prostitution.

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4 **COUNT TWO**
(PANDERING)

5 On or about and between May 13, 2020 to May 15, 2020, in the County of Sacramento,
6 defendants PAUL ANTHONY GREGORIO and XUAN PHI NGUYEN committed the crime of
7 PANDERING, in violation of PENAL CODE SECTION 266i(a)(3), a Felony, in that they did
8 unlawfully procure a place for Y. S. aka "[REDACTED]", another person, in a house of prostitution.

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10 **COUNT THREE**
(PANDERING)

11 On or about November 3, 2020, in the County of Sacramento, defendants PAUL
12 ANTHONY GREGORIO and XUAN PHI NGUYEN committed the crime of PANDERING, in
13 violation of PENAL CODE SECTION 266i(a)(3), a Felony, in that they did unlawfully procure a
14 place for M. S. aka "[REDACTED]", another person, in a house of prostitution.

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16 **COUNT FOUR**
(PANDERING)

17 On or about February 23, 2021, in the County of Sacramento, defendants PAUL
18 ANTHONY GREGORIO and XUAN PHI NGUYEN committed the crime of PANDERING, in
19 violation of PENAL CODE SECTION 266i(a)(3), a Felony, in that they did unlawfully procure a
20 place for S. M. aka "[REDACTED]", another person, in a house of prostitution.

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22 **COUNT FIVE**
(PANDERING)

23 On or about February 15, 2022, in the County of Sacramento, defendants PAUL
24 ANTHONY GREGORIO and XUAN PHI NGUYEN committed the crime of PANDERING, in
25 violation of PENAL CODE SECTION 266i(a)(3), a Felony, in that they did unlawfully procure a
26 place for, J. R. aka "[REDACTED]", another person, in a house of prostitution.
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**COUNT SIX
(PANDERING)**

On or about February 28, 2022, in the County of Sacramento, defendants PAUL ANTHONY GREGORIO and XUAN PHI NGUYEN committed the crime of PANDERING, in violation of PENAL CODE SECTION 266i(a)(3), a Felony, in that they did unlawfully procure a place for, E. L. aka "[REDACTED]", another person, in a house of prostitution.

**COUNT SEVEN
(PANDERING)**

On or about May 3, 2022, in the County of Sacramento, defendants PAUL ANTHONY GREGORIO and XUAN PHI NGUYEN committed the crime of PANDERING, in violation of PENAL CODE SECTION 266i(a)(3), a Felony, in that they did unlawfully procure a place for, B. V. aka "[REDACTED]", another person, in a house of prostitution.

**COUNT EIGHT
(PANDERING)**

On or about May 4, 2022, in the County of Sacramento, defendants PAUL ANTHONY GREGORIO and XUAN PHI NGUYEN committed the crime of PANDERING, in violation of PENAL CODE SECTION 266i(a)(3), a Felony, in that they did unlawfully procure a place for, E. L. aka "[REDACTED]", another person, in a house of prostitution.

SPECIAL ALLEGATION – SEX OFFENSES

It is further alleged, as to Counts one through eight that in the commission or attempted commission of the above felony offenses, the defendants, Gregorio and Nguyen, are ineligible for probation or suspension of sentence pursuant to PENAL CODE SECTION 1203.065(a).

NOTICE: It is further alleged that prison custody time for counts one through eight is to be served in state prison pursuant to Penal Code section 1170.1(a).

1 **NOTICE:** Pursuant to Penal Code section 1170(f), any allegation making a defendant ineligible
2 to serve a state prison sentence in the county jail shall not be subject to dismissal pursuant to Penal
3 Code section 1385.

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5 **NOTICE:** Conviction of these offenses will require the defendants to provide specimens and
6 samples pursuant to Penal Code section 296. Willful refusal to provide the samples and
7 impressions is a crime.

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11 Dated: 06/13/2022

Respectfully Submitted,

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