

COPY

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AUG 11 2023

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF COCHISE

AMY J. HUNLEY
CLERK OF SUPERIOR COURT

BY: UP 0114 BH

STATE OF ARIZONA,
Plaintiff,

GRAND JURY NO. GJ2023-

CASE NO. CR202300788

vs.

INDICTMENT

ALLEN WILLIAM WHEELER,
Defendant.

The Grand Jurors of the County of Cochise, in the name of the State of Arizona, and
by its authority accuse:

ALLEN WILLIAM WHEELER

and charges that in Cochise County:

COUNT 1: Sexual Exploitation Of A Minor

ALLEN WILLIAM WHEELER, on or about August 4, 2023, knowingly did
distribute, transport, exhibit, receive, sell, purchase, electronically transmit, possess, or
exchange any visual depiction in which a minor under fifteen years of age is engaged in
exploitive exhibition or other sexual conduct, to wit: File name: 9bb96822bbdcedc4.jpg
Description: This is an image of a female child, estimated to be between 10 and 14 years
old, unclothed, exposing her breasts and vagina, sitting on an unknown unclothed male,
engaged in penis-vaginal sexual intercourse, in violation of A.R.S. §§ 13-3553(A)(2), 13-
3551, 13-3821, 13-705, 13-701, 13-702, 13-703, 13-708 and 13-801, a class 2 Felony.

The State further alleges that the offense charged in this count is a Dangerous Crime
Against Children in violation of A.R.S. §13-705.

COUNT 2: Sexual Exploitation Of A Minor

ALLEN WILLIAM WHEELER, on or about August 4, 2023, knowingly did
distribute, transport, exhibit, receive, sell, purchase, electronically transmit, possess, or

1 exchange any visual depiction in which a minor under fifteen years of age is engaged in
2 exploitive exhibition or other sexual conduct, to
3 wit: Filename: 256_3f20b0fadbff36f8.png Description: This is an image of two female
4 children, estimated to be between the ages of 8 - 12 years old, unclothed, exposing
5 their breasts and vagina, in violation of A.R.S. §§ 13-3553(A)(2), 13-3551, 13-3821, 13-
6 705, 13-701, 13-702, 13-703, 13-708 and 13-801, a class 2 Felony.

8 The State further alleges that the offense charged in this count is a Dangerous Crime
9 Against Children in violation of A.R.S. §13-705.

10
11 **COUNT 3: Sexual Exploitation Of A Minor**

12 ALLEN WILLIAM WHEELER, on or about August 4, 2023, knowingly did
13 distribute, transport, exhibit, receive, sell, purchase, electronically transmit, possess, or
14 exchange any visual depiction in which a minor under fifteen years of age is engaged in
15 exploitive exhibition or other sexual conduct, to wit: Filename: 256_
16 4f799dd79fe4a07d.png Description: This is an image of three females, unclothed, standing
17 near a waterfall, two of the females are estimated to be between the ages of 6 and 14 with
18 one of them exposing their vagina, in violation of A.R.S. §§ 13-3553(A)(2), 13-3551, 13-
19 3821, 13-705, 13-701, 13-702, 13-703, 13-708 and 13-801, a class 2 Felony.

20
21 The State further alleges that the offense charged in this count is a Dangerous Crime
22 Against Children in violation of A.R.S. §13-705.

23
24 **COUNT 4: Sexual Exploitation Of A Minor**

25 ALLEN WILLIAM WHEELER, on or about August 4, 2023, knowingly did
distribute, transport, exhibit, receive, sell, purchase, electronically transmit, possess, or

1 exchange any visual depiction in which a minor under fifteen years of age is engaged in
2 exploitive exhibition or other sexual conduct, to
3 wit: Filename: 256_797cb12c6d9af2f2.png Description: This is an image of an adult and
4 two female children, estimated to be between the ages of 8-12 years old, unclothed,
5 exposing their breasts and vagina, in violation of A.R.S. §§ 13-3553(A)(2), 13-3551, 13-
6 3821, 13-705, 13-701, 13-702, 13-703, 13-708 and 13-801, a class 2 Felony.

8 The State further alleges that the offense charged in this count is a Dangerous Crime
9 Against Children in violation of A.R.S. §13-705.

10 **COUNT 5: Tampering With Physical Evidence**

11 **ALLEN WILLIAM WHEELER**, on or about August 4, 2023, with intent that it
12 be used, introduced, rejected or made unavailable in an official proceeding which was then
13 pending or which **ALLEN WILLIAM WHEELER** knew was about to be instituted, did
14 destroy, mutilate, alter, conceal or remove physical evidence, to-wit: thumb drive, with the
15 intent to impair its verity or availability, in violation of A.R.S. §§ 13-2809(A)(1), 13-2801,
16 13-701, 13-702, 13-703, 13-708, and 13-801, a class 6 Felony.

18 DATED this 10th day of August, 2023.

19 COCHISE COUNTY ATTORNEY

True Bill

22 BY:

21 

23 Lori A. Zucco
24 Chief Criminal Deputy
25 County Attorney

Juror #3

Foreperson of the Grand Jury

LZ/ec