MARK BRNOVICH

Attorney General Firm Bar No. 14000

RACHEL R. HEINTZ

Assistant Attorney General State Bar No.: 028823

Pima County Computer No.: 67140 400 West Congress, Suite S-315

Tucson, Arizona 85701

Telephone No.: (520) 209-4310

CRMTucson@azag.gov T002-2019-000142

AZ DPS DR# 1900306442

Attorneys for Plaintiff

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

STATE OF ARIZONA,

Case No:

Plaintiff,

85 SGJ 153

v.

INDICTMENT

DAVID JAMES SEEFELD (001),

CHARGING VIOLATIONS OF:

Defendant.

COUNT 1: AGGRAVATED LURING A MINOR FOR SEXUAL EXPLOITATION, a Class 2 Felony, in violation of A.R.S. § 13-3560

COUNT 2: PREPATORY SEXUAL CONDUCT WITH A MINOR, a Class 3 Felony, in violation of A.R.S. §§ 13-1001, 13-1405

COUNTS 3-5: FURNISHING ITEMS TO MINORS, a Class 4 Felony, in violation of A.R.S. § 13-3506.01

The Arizona State Grand Jury accuses **DAVID JAMES SEEFELD (001)**, charging on this 6th day of August 2019, that in or from Pima County, Arizona:

COUNT ONE AGGRAVATED LURING A MINOR FOR SEXUAL EXPLOITATION, A CLASS 2 FELONY

On or about July 25, 2019, through July 30, 2019, **DAVID JAMES SEEFELD (001)**, knowing the character and content of the depiction, used an electronic communication device to transmit at least one visual depiction of material that was harmful to minors for the purpose of initiating or engaging in communication with a recipient who **DAVID JAMES SEEFELD** (001) knew or had reason to know was a minor and, by means of the communication, **DAVID JAMES SEEFELD (001)** offered or solicited sexual conduct, knowing or having reason to know the person was a minor, in violation of A.R.S. §§ 13-3560, 13-301, 13-302, 13-303, 13-304, 13-601, 13-701, 13-705, 13-801, and 13-811.

<u>COUNT TWO</u> PREPATORY SEXUAL CONDUCT WITH A MINOR, A CLASS 3 FELONY

On or about July 25, 2019, through July 30, 2019, **DAVID JAMES SEEFELD (001)** attempted to knowingly or intentionally engage in sexual intercourse or oral sexual conduct with a child under fifteen years of age, in violation of A.R.S. §§ 13-1001, 13-1405, 13-301, 13-302, 13-303, 13-304, 13-601, 13-701, 13-705, 13-801, and 13-811.

<u>COUNT THREE</u> <u>FURNISHING HARMFUL ITEMS TO MINORS, A CLASS 4 FELONY</u>

On or about July 25, 2019, through July 30, 2019, **DAVID JAMES SEEFELD (001)**, intentionally or knowingly transmitted or sent to a minor by means of electronic mail, personal messaging or any other direct internet communication an item that is harmful to minors when, **DAVID JAMES SEEFELD (001)**, believed at the time of the transmission that a minor in this state would receive the item, in violation of A.R.S. §§ 13-3506.01, 13-301, 13-302, 13-303, 13-304, 13-601, 13-701, 13-705, 13-801, and 13-811.

<u>COUNT FOUR</u> <u>FURNISHING HARMFUL ITEMS TO MINORS, A CLASS 4 FELONY</u>

On or about July 25, 2019, through July 30, 2019, **DAVID JAMES SEEFELD (001)**, intentionally or knowingly transmitted or sent to a minor by means of electronic mail, personal messaging or any other direct internet communication an item that is harmful to minors when, **DAVID JAMES SEEFELD (001)**, believed at the time of the transmission that a minor in this state would receive the item, in violation of A.R.S. §§ 13-3506.01, 13-301, 13-302, 13-303, 13-304, 13-601, 13-701, 13-705, 13-801, and 13-811.

COUNT FIVE FURNISHING HARMFUL ITEMS TO MINORS, A CLASS 4 FELONY

On or about July 25, 2019, through July 30, 2019, **DAVID JAMES SEEFELD (001)**, intentionally or knowingly transmitted or sent to a minor by means of electronic mail, personal messaging or any other direct internet communication an item that is harmful to minors when,

DAVID JAMES SEEFELD (001), believed at the time of the transmission that a minor in this state would receive the item, in violation of A.R.S. §§ 13-3506.01, 13-301, 13-302, 13-303, 13-304, 13-601, 13-701, 13-705, 13-801, and 13-811.

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in Pima County, Arizona.

A True Bill")

MARK BRNOVICH ATTORNEY GENERAL STATE OF ARIZONA

RACHEL R. HEINTZ Assistant Attorney General Foreperson of the State Grand Jury