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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF GREENLEE**

THE STATE OF ARIZONA,

Plaintiff,

v.

NEAL LEE TUOMI,

Defendant.

Case No: *CR 2019-00093*

85 SGJ 325

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNTS 1-10: SEXUAL
EXPLOITATION OF A MINOR, Class 2
Felonies and Dangerous Crimes Against
Children, in violation of A.R.S. § 13-3553**

The 85th Arizona State Grand Jury accuses **NEAL LEE TUOMI**, charging on this 28th day of October, 2019, that in or from Greenlee County, Arizona:

COUNT 1

SEXUAL EXPLOITATION OF A MINOR

During a period of time beginning on or about August 20, 2019, and ending on or about October 23, 2019, **NEAL LEE TUOMI** knowingly distributed, received,

electronically transmitted, possessed or exchanged a visual or print medium in which a minor is engaged in exploitative exhibition or other sexual conduct, said minor being under fifteen years of age, in violation of A.R.S. §§ 13-3551, 13-3553, 13-705, 13-3821, 13-610, 13-701, 13-702, and 13-801.

This conduct occurred when NEAL LEE TUOMI distributed, received, electronically transmitted, possessed or exchanged a graphic image with the file name “7874-1485759713.jpg”.

COUNT 2

SEXUAL EXPLOITATION OF A MINOR

During a period of time beginning on or about August 20, 2019, and ending on or about October 23, 2019, NEAL LEE TUOMI knowingly distributed, received, electronically transmitted, possessed or exchanged a visual or print medium in which a minor is engaged in exploitative exhibition or other sexual conduct, said minor being under fifteen years of age, in violation of A.R.S. §§ 13-3551, 13-3553, 13-705, 13-3821, 13-610, 13-701, 13-702, and 13-801.

This conduct occurred when NEAL LEE TUOMI distributed, received, electronically transmitted, possessed or exchanged a graphic image with the file name “7866-1485757343.jpg”.

COUNT 3

SEXUAL EXPLOITATION OF A MINOR

During a period of time beginning on or about August 20, 2019, and ending on or about October 23, 2019, NEAL LEE TUOMI knowingly distributed, received, electronically transmitted, possessed or exchanged a visual or print medium in which a minor is engaged in exploitative exhibition or other sexual conduct, said minor being under fifteen years of age, in violation of A.R.S. §§ 13-3551, 13-3553, 13-705, 13-3821, 13-610, 13-701, 13-702, and 13-801.

This conduct occurred when NEAL LEE TUOMI distributed, received, electronically transmitted, possessed or exchanged a graphic image with the file name “8860-Felixxx_090348NGz_661591970744.jpg”.

COUNT 4

SEXUAL EXPLOITATION OF A MINOR

During a period of time beginning on or about August 20, 2019, and ending on or about October 23, 2019, NEAL LEE TUOMI knowingly distributed, received, electronically transmitted, possessed or exchanged a visual or print medium in which a minor is engaged in exploitative exhibition or other sexual conduct, said minor being under fifteen years of age, in violation of A.R.S. §§ 13-3551, 13-3553, 13-705, 13-3821, 13-610, 13-701, 13-702, and 13-801.

This conduct occurred when NEAL LEE TUOMI distributed, received, electronically transmitted, possessed or exchanged a graphic image with the file name “7943-1485794353.jpg”.

COUNT 5

SEXUAL EXPLOITATION OF A MINOR

During a period of time beginning on or about August 20, 2019, and ending on or about October 23, 2019, NEAL LEE TUOMI knowingly distributed, received, electronically transmitted, possessed or exchanged a visual or print medium in which a minor is engaged in exploitative exhibition or other sexual conduct, said minor being under fifteen years of age, in violation of A.R.S. §§ 13-3551, 13-3553, 13-705, 13-3821, 13-610, 13-701, 13-702, and 13-801.

This conduct occurred when NEAL LEE TUOMI distributed, received, electronically transmitted, possessed or exchanged a graphic image with the file name “8008-1485845920 JulyJailbait.jpg”.

COUNT 6

SEXUAL EXPLOITATION OF A MINOR

During a period of time beginning on or about August 20, 2019, and ending on or about October 23, 2019, NEAL LEE TUOMI knowingly distributed, received, electronically transmitted, possessed or exchanged a visual or print medium in which a minor is engaged in exploitative exhibition or other sexual conduct, said minor being under fifteen years of age, in violation of A.R.S. §§ 13-3551, 13-3553, 13-705, 13-3821, 13-610, 13-701, 13-702, and 13-801.

This conduct occurred when NEAL LEE TUOMI distributed, received, electronically transmitted, possessed or exchanged a graphic image with the file name "8443-1b52634em_8.jpg".

COUNT 7

SEXUAL EXPLOITATION OF A MINOR

During a period of time beginning on or about August 20, 2019, and ending on or about October 23, 2019, NEAL LEE TUOMI knowingly distributed, received, electronically transmitted, possessed or exchanged a visual or print medium in which a minor is engaged in exploitative exhibition or other sexual conduct, said minor being under fifteen years of age, in violation of A.R.S. §§ 13-3551, 13-3553, 13-705, 13-3821, 13-610, 13-701, 13-702, and 13-801.

This conduct occurred when NEAL LEE TUOMI distributed, received, electronically transmitted, possessed or exchanged a graphic image with the file name "8820-Felixxx_074125YVs_176014.jpg".

COUNT 8

SEXUAL EXPLOITATION OF A MINOR

During a period of time beginning on or about August 20, 2019, and ending on or about October 23, 2019, NEAL LEE TUOMI knowingly distributed, received,

electronically transmitted, possessed or exchanged a visual or print medium in which a minor is engaged in exploitative exhibition or other sexual conduct, said minor being under fifteen years of age, in violation of A.R.S. §§ 13-3551, 13-3553, 13-705, 13-3821, 13-610, 13-701, 13-702, and 13-801.

This conduct occurred when **NEAL LEE TUOMI** distributed, received, electronically transmitted, possessed or exchanged a graphic image with the file name “8646-Felixxx_062205vcG_20050601082847r.jpg”.

COUNT 9

SEXUAL EXPLOITATION OF A MINOR

During a period of time beginning on or about August 20, 2019, and ending on or about October 23, 2019, **NEAL LEE TUOMI** knowingly distributed, received, electronically transmitted, possessed or exchanged a visual or print medium in which a minor is engaged in exploitative exhibition or other sexual conduct, said minor being under fifteen years of age, in violation of A.R.S. §§ 13-3551, 13-3553, 13-705, 13-3821, 13-610, 13-701, 13-702, and 13-801.

This conduct occurred when **NEAL LEE TUOMI** distributed, received, electronically transmitted, possessed or exchanged a graphic image with the file name “8076-1bd63cpgt_16.jpg”.

COUNT 10

SEXUAL EXPLOITATION OF A MINOR

During a period of time beginning on or about August 20, 2019, and ending on or about October 23, 2019, **NEAL LEE TUOMI** knowingly distributed, received, electronically transmitted, possessed or exchanged a visual or print medium in which a minor is engaged in exploitative exhibition or other sexual conduct, said minor being under fifteen years of age, in violation of A.R.S. §§ 13-3551, 13-3553, 13-705, 13-3821, 13-610, 13-701, 13-702, and 13-801.

This conduct occurred when NEAL LEE TUOMI distributed, received, electronically transmitted, possessed or exchanged a graphic image with the file name "8678-Felixxx_063158RHa_89231.jpg".

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

A True Bill
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 10/28/19

T.C.L.
TODD C. LAWSON
Assistant Attorney General

[Signature]
Foreperson of the State Grand Jury

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