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

STATE OF ARIZONA,

Plaintiff,

v.

DANNY LEE WALLACE,

Defendant.

Case No: **CR 2016-123872-001 DT**

78 SGJ 305

INDICTMENT

CHARGING VIOLATIONS OF:

COUNT 1: COMPUTER TAMPERING, a Class 5 Felony, in violation of A.R.S. §13-2316(A)(5)

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

COUNTS 3-5: COMMERCIAL SEXUAL EXPLOITATION, Class 2 Felonies, in violation of A.R.S. §13-3552(A)(1)

COUNTS 6-8 : SEXUAL EXPLOITATION OF A MINOR, Class 2 Felonies, in violation of A.R.S. §13-3553(A)(2)

The 78th Arizona State Grand Jury accuses **DANNY LEE WALLACE**, charging on this 23rd day of May, 2016, that in or from Maricopa County, Arizona:

COUNT 1

(COMPUTER TAMPERING)

During a period of time beginning on or about December 1, 2015, and ending on or about May 19, 2016, defendant **DANNY LEE WALLACE**, without authority or exceeding authorization of use, recklessly used a computer, computer system or network to engage in a scheme or course of conduct that would cause a reasonable person to suffer substantial emotional distress, serves no legitimate purpose, was directed at another person, and that seriously alarms, torments, threatens or terrorizes that person.

This conduct occurred when the defendant **DANNY LEE WALLACE** used the “Kik” chat network to send messages to Victim 1.

All in violation of A.R.S. §§ 13-2316(A)(5), 13-2301, 13-610, 13-701, 13-702, and 13-801.

COUNT 2

(AGGRAVATED LURING)

During a period of time beginning on or about December 1, 2015, and ending on or about May 19, 2016, defendant **DANNY LEE WALLACE**, knowing the character and content of the depiction, used an electronic communication device to transmit at least one visual depiction of material that is harmful to minors for the purpose of initiating or engaging in communication with a recipient who the person knew or had reason to know was a minor, and by means of the communication, offered or solicited sexual conduct with the minor.

This conduct occurred when the defendant **DANNY LEE WALLACE** sent pornographic images to Victim 1 and solicited sexual conduct with Victim 1 using a Samsung Galaxy S5 cellular telephone while using the false identity Veronica Wallace a/k/a Veronica Sanchez, Vero Wallace, Vero, VeroOneHotLesbian1@gmail.com, Ashley Guess and “Love Sucks.”

All in violation of A.R.S. §§ 13-3560, 13-3551, 13-4801, 13-3501, 13-610, 13-701, 13-702, and 13-801.

COUNT 3

(COMMERCIAL SEXUAL EXPLOITATION)

During a period of time beginning on or about December 1, 2015, and ending on or about March 4, 2016, defendant **DANNY LEE WALLACE**, knowingly used, employed, persuaded, enticed, induced or coerced a minor to engage in exploitive exhibition or other sexual conduct for the purpose of producing any visual depiction.

This conduct occurred when the defendant **DANNY LEE WALLACE** communicated with Victim 1, and as a result received an image timestamped 3/4/16 12:06:38 from Victim 1.

All in violation of A.R.S. §§ 13-3552(A)(1), 13-3551, 13-610, 13-701, 13-702, and 13-801.

COUNT 4

(COMMERCIAL SEXUAL EXPLOITATION)

During a period of time beginning on or about December 1, 2015, and ending on or about March 4, 2016, defendant **DANNY LEE WALLACE**, knowingly used, employed, persuaded, enticed, induced or coerced a minor to engage in exploitive exhibition or other sexual conduct for the purpose of producing any visual depiction.

This conduct occurred when the defendant **DANNY LEE WALLACE** communicated with Victim 1, and as a result received an image timestamped 3/4/16 12:09:46 from Victim 1.

All in violation of A.R.S. §§ 13-3552(A)(1), 13-3551, 13-610, 13-701, 13-702, and 13-801.

COUNT 5

(COMMERCIAL SEXUAL EXPLOITATION)

During a period of time beginning on or about December 1, 2015, and ending on or about March 4, 2016, defendant **DANNY LEE WALLACE**, knowingly used, employed, persuaded, enticed, induced or coerced a minor to engage in exploitive exhibition or other sexual conduct for the purpose of producing any visual depiction.

This conduct occurred when the defendant **DANNY LEE WALLACE** communicated with Victim 1, and as a result received an image timestamped 3/4/16 12:13:46.

All in violation of A.R.S. §§ 13-3552(A)(1), 13-3551, 13-610, 13-701, 13-702, and 13-801.

COUNT 6

(SEXUAL EXPLOITATION OF A MINOR)

On or about May 19, 2016, defendant **DANNY LEE WALLACE**, knowingly possessed a visual or print medium in which minors are engaged in exploitive exhibition or other sexual conduct, said minors being under fifteen years of age.

This conduct occurred when the defendant **DANNY LEE WALLACE** possessed an image timestamped 3/4/16 12:06:38.

All in violation of A.R.S. §§ 13-3553(A)(2), 13-3551, 13-610, 13-701, 13-702, and 13-801.

COUNT 7

(SEXUAL EXPLOITATION OF A MINOR)

On or about May 19, 2016, defendant **DANNY LEE WALLACE**, knowingly possessed a visual or print medium in which minors are engaged in exploitive exhibition or other sexual conduct.

This conduct occurred when the defendant **DANNY LEE WALLACE** possessed an image timestamped 3/4/16 12:09:46.

All in violation of A.R.S. §§ 13-3553(A)(2), 13-3551, 13-610, 13-701, 13-702, and 13-801.

COUNT 8

(SEXUAL EXPLOITATION OF A MINOR)

On or about May 19, 2016, defendant **DANNY LEE WALLACE**, knowingly possessed a visual or print medium in which minors are engaged in exploitative exhibition or other sexual conduct.

This conduct occurred when the defendant **DANNY LEE WALLACE** possessed an image timestamped 3/4/16 12:13:46.

All in violation of A.R.S. §§ 13-3553(A)(2), 13-3551, 13-610, 13-701, 13-702, and 13-801.

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

“A True Bill”
(A "True Bill")

MARK BRNOVICH
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 23 May 2016

/s/ Todd C. Lawson
TODD C. LAWSON
Assistant Attorney General
#5100587v2

/s/ Foreperson
Foreperson of the State Grand Jury