IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF PIMA

TONI L. HELLON CLERK, SUPERIOR COURT

THE STATE OF ARIZONA,

Plaintiff,

CAUSE NO.

2018 SEP 14 PM 2: 32

DIRECT INDICTMENT

D. WANDELL, DEPUTY

001-CHRISTOPHER CLEMENTS

Defendant(s).

276-GJ-801

CR20183978-001

The grand jurors of the County of Pima, in the name of the State of Arizona, and by its authority accuse CHRISTOPHER CLEMENTS, and charge that in Pima County:

COUNT ONE: FIRST DEGREE MURDER, A CLASS ONE FELONY

On or about the 20th day of April, 2012, through the 21st day of April, 2012, CHRISTOPHER CLEMENTS murdered I.C., a minor under fifteen years of age, in violation of A.R.S. § 13-1105.

COUNT TWO: KIDNAPPING A MINOR UNDER FIFTEEN, A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 20th day of April, 2012, through the 21st day of April, 2012, CHRISTOPHER CLEMENTS knowingly restrained I.C., a minor under fifteen years of age, with the intent to inflict death, physical injury or a sexual offense on her, or to otherwise aid in the commission of a felony, in violation of A.R.S. § 13-1304A.

COUNT THREE: BURGLARY IN THE SECOND DEGREE, A CLASS THREE FELONY

On or about the 20th day of April, 2012, through the 21st day of April, 2012, CHRISTOPHER CLEMENTS committed burglary in the second degree of a residential structure, belonging to or occupied by I.C., her parents and her siblings, in violation of A.R.S. § 13-1507A.

COUNT FOUR: FIRST DEGREE MURDER, A CLASS ONE FELONY

On or about the 3rd day of June, 2014, through the 4th day of June, 2014, CHRISTOPHER CLEMENTS murdered M.G., a minor under fifteen years of age, in violation of A.R.S. §13-1105.

COUNT FIVE: KIDNAPPING A MINOR UNDER FIFTEEN, A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 3rd day of June, 2014, through the 4th day of June, 2014, CHRISTOPHER CLEMENTS knowingly restrained M.G., a minor under fifteen years of age, with the intent to inflict death, physical injury or a sexual offense on her, or to otherwise aid in the commission of a felony, in violation of A.R.S. § 13-1304A.

COUNT SIX: BURGLARY IN THE SECOND DEGREE, A CLASS THREE FELONY

On or about the 18th day of February, 2012, through the 19th day of February, 2012, CHRISTOPHER CLEMENTS committed burglary in the second degree of a residential structure, belonging to or occupied by P. T. in violation of A.R.S. § 13-1507A.

COUNT SEVEN: THEFT BY CONTROLLING STOLEN PROPERTY, A CLASS TWO FELONY

On or about the 18th day of February, 2012, through the 19th day of February, 2012, CHRISTOPHER CLEMENTS committed theft by controlling property with a value of \$25,000 or more, as follows: Gold coins and miscellaneous jewelry items belonging to P. T., knowing or having reason to know that the property was stolen, in violation of A.R.S. § 13-1802A5G.

COUNT EIGHT: TRAFFICKING IN STOLEN PROPERTY, A CLASS TWO FELONY

On or about the 19th day of February, 2012, CHRISTOPHER CLEMENTS knowingly initiated, organized, planned, financed, directed, managed or supervised the theft and trafficking in the property of another, that had been stolen, to wit: 21 gold coins belonging to P T in violation of A.R.S. § 13-2307B.

COUNT NINE: SEXUAL EXPLOITATION OF A MINOR A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 6th day of November, 2013 through the 30th day of January, 2016, CHRISTOPHER CLEMENTS knowingly distributed, transported, exhibited, received, sold, purchased, electronically transmitted, possessed or exchanged any visual depiction in which a minor under fifteen years of age is engaged in exploitive exhibition or other sexual conduct, to wit: Img_0433.jpg depicting a girl's genitals, in violation of A.R.S. § 13-3553A2.

COUNT TEN: SEXUAL EXPLOITATION OF A MINOR A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 21st day of January, 2014 through the 30th day of January, 2016, CHRISTOPHER CLEMENTS knowingly distributed, transported, exhibited, received, sold, purchased, electronically transmitted, possessed or exchanged any visual depiction in which a minor under fifteen years of age is engaged in exploitive exhibition or other sexual conduct, to wit: Img_0628.jpg depicting a girl's genitals in violation of A.R.S. § 13-3553A2.

COUNT ELEVEN: SEXUAL EXPLOITATION OF A MINOR A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 26th day of April, 2014 through the 30th day of January, 2016, CHRISTOPHER CLEMENTS knowingly distributed, transported, exhibited, received, sold, purchased, electronically transmitted, possessed or exchanged any visual depiction in which a minor under fifteen years of age is engaged in exploitive exhibition or other sexual conduct, to wit: Img_0732.jpg depicting a girl's genitals in violation of A.R.S. § 13-3553A2.

COUNT TWELVE: SEXUAL EXPLOITATION OF A MINOR A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 23rd day of October, 2013 through the 30th day of January, 2016, CHRISTOPHER CLEMENTS knowingly distributed, transported, exhibited, received, sold, purchased, electronically transmitted, possessed or exchanged any visual depiction in which a minor under fifteen years of age is engaged in exploitive exhibition or other sexual conduct, to wit: Img_0049.jpg depicting a girl's genitals in violation of A.R.S. § 13-3553A2

COUNT THIRTEEN: SEXUAL EXPLOITATION OF A MINOR A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 19th day of December, 2014 through the 30th day of January, 2016, CHRISTOPHER CLEMENTS knowingly distributed, transported, exhibited, received, sold, purchased, electronically transmitted, possessed or exchanged any visual depiction in which a minor under fifteen years of age is engaged in exploitive exhibition or other sexual conduct, to wit: Img_1146.jpg depicting a girl's genitals in violation of A.R.S. § 13-3553A2.

COUNT FOURTEEN: SEXUAL EXPLOITATION OF A MINOR A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 10th day of April, 2014 through the 30th day of January, 2016, CHRISTOPHER CLEMENTS knowingly distributed, transported, exhibited, received, sold, purchased, electronically transmitted, possessed or exchanged any visual depiction in which a minor under fifteen years of age is engaged in exploitive exhibition or other sexual conduct, to wit: Img_0709.jpg depicting a girl's genitals in violation of A.R.S. § 13-3553A2.

COUNT FIFTEEN: SEXUAL EXPLOITATION OF A MINOR A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 26th day of April, 2014 through the 30th day of January, 2016, CHRISTOPHER CLEMENTS knowingly distributed, transported, exhibited, received, sold, purchased, electronically transmitted, possessed or exchanged any visual depiction in which a minor under fifteen years of age is engaged in exploitive exhibition or other sexual conduct, to wit: Img_0730.jpg depicting a girl's genitals in violation of A.R.S. § 13-3553A2.

COUNT SIXTEEN: SEXUAL EXPLOITATION OF A MINOR A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 19th day of December, 2014 through the 30th day of January, 2016, CHRISTOPHER CLEMENTS knowingly distributed, transported, exhibited, received, sold, purchased, electronically transmitted, possessed or exchanged any visual depiction in which a minor under fifteen years of age is engaged in exploitive exhibition or other sexual conduct, to wit: Img_1145.jpg depicting a girl's genitals in violation of A.R.S. § 13-3553A2.

COUNT SEVENTEEN: SEXUAL EXPLOITATION OF A MINOR A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 19th day of December, 2014 through the 30th day of January, 2016, CHRISTOPHER CLEMENTS knowingly distributed, transported, exhibited, received, sold, purchased, electronically transmitted, possessed or exchanged any visual depiction in which a minor under fifteen years of age is engaged in exploitive exhibition or other sexual conduct, to wit: Img_1151.jpg depicting a girl's genitals in violation of A.R.S. § 13-3553A2.

COUNT EIGHTEEN: SEXUAL EXPLOITATION OF A MINOR A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 7th day of February, 2014 through the 30th day of January, 2016, CHRISTOPHER CLEMENTS knowingly distributed, transported, exhibited, received, sold, purchased, electronically transmitted, possessed or exchanged any visual depiction in which a minor under fifteen years of age is engaged in exploitive exhibition or other sexual conduct, to wit: Img_0661.jpg depicting a girl's genitals in violation of A.R.S. § 13-3553A2.

COUNT NINETEEN: SEXUAL EXPLOITATION OF A MINOR A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 6th day of November, 2013 through the 30th day of January, 2016, CHRISTOPHER CLEMENTS knowingly distributed, transported, exhibited, received, sold, purchased, electronically transmitted, possessed or exchanged any visual depiction in which a minor under fifteen years of age is engaged in exploitive exhibition or other sexual conduct, to wit: Img_0448.jpg depicting a girl's genitals in violation of A.R.S. § 13-3553A2.

COUNT TWENTY: SEXUAL EXPLOITATION OF A MINOR A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 23rd day of November, 2014 through the 30th day of January, 2016, CHRISTOPHER CLEMENTS knowingly distributed, transported, exhibited, received, sold, purchased, electronically transmitted, possessed or exchanged any visual depiction in which a minor under fifteen years of age is engaged in exploitive exhibition or other sexual conduct, to wit: Img_0979.jpg depicting a girl's pubic area in violation of A.R.S. § 13-3553A2.

COUNT TWENTY-ONE: SEXUAL EXPLOITATION OF A MINOR A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 29th day of January, 2014 through the 30th day of January, 2016, CHRISTOPHER CLEMENTS knowingly distributed, transported, exhibited, received, sold, purchased, electronically transmitted, possessed or exchanged any visual depiction in which a minor under fifteen years of age is engaged in exploitive exhibition or other sexual conduct, to wit: Img_0630.jpg depicting a girl's genitals in violation of A.R.S. § 13-3553A2.

COUNT TWENTY-TWO: SEXUAL EXPLOITATION OF A MINOR A DANGEROUS CRIME AGAINST CHILDREN, A CLASS TWO FELONY

On or about the 18th day of December, 2014 through the 30th day of January, 2016, CHRISTOPHER CLEMENTS knowingly distributed, transported, exhibited, received, sold, purchased, electronically transmitted, possessed or exchanged any visual depiction in which a minor under fifteen years of age is engaged in exploitive exhibition or other sexual conduct, to wit: Img_1074.jpg depicting a boy's genitals in violation of A.R.S. § 13-3553A2.

Pima County Sheriff Department: 140606143 Tucson Police Dept: 1204210265, 1202208002

Known AKA's:

CHRISTOPHER M CLEMENTS(1), CHRISTOPHER CLEMENTS(1), DAMION

JAMES JOHNSON(1)

BARBARA LAWALL
PIMA COUNTY ATTORNEY

By:

Foreperson of the Grand Jury

Dated: