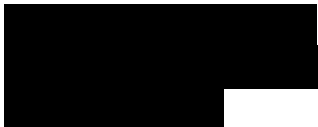


STATE OF INDIANA)
) SS:
COUNTY OF DUBOIS)

STATE OF INDIANA

VS

LEO FLORES



SSN: (REDACTED)

IN THE DUBOIS CIRCUIT COURT

CAUSE NUMBER 19C01-2302-F5-

INFORMATION FOR:

COUNT 1:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(1)
LEVEL 5 FELONY

COUNT 2:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(1)
LEVEL 5 FELONY

COUNT 3:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(1)
LEVEL 5 FELONY

COUNT 4:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(1)
LEVEL 5 FELONY

COUNT 5:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(1)
LEVEL 5 FELONY

COUNT 6:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(1)
LEVEL 5 FELONY

COUNT 7:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(1)
LEVEL 5 FELONY

COUNT 8:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(1)
LEVEL 5 FELONY

COUNT 9:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(1)
LEVEL 5 FELONY

COUNT 10:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(1)
LEVEL 5 FELONY

COUNT 11:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(1)
LEVEL 5 FELONY

COUNT 12:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(1)
LEVEL 5 FELONY

COUNT 13:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(1)
LEVEL 5 FELONY

COUNT 14:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(1)
LEVEL 5 FELONY

Count 1: On or about July 14, 2021 in Dubois County, State of Indiana, the following named defendant, Leo Flores, did knowingly or intentionally possess or access with intent to view a motion picture or digitized image, to wit: a video; that depicted or described sexual conduct by a child who Leo Flores knew to be less than eighteen (18) years of age and/or who appeared to be less than eighteen (18) years of age, and that lacked serious literary, artistic, political or scientific value; and the child who was depicted or described was less than twelve (12) years of age.

Count 2: On or between July 15, 2021 and June 30, 2022, at a time different than Counts 3, 4, 5, 6, 7, 8, 9, and 10, in Dubois County, State of Indiana, the following named defendant, Leo Flores, did knowingly or intentionally possess or access with intent to view a motion picture or digitized image, to wit: a video; that depicted or described sexual conduct by a child who Leo Flores knew to be less than eighteen (18) years of age and/or who appeared to be less than eighteen (18) years of age, and that lacked serious literary, artistic, political or scientific value; and the child who was depicted or described was less than twelve (12) years of age.

Count 3: On or between July 15, 2021 and June 30, 2022, at a time different than Counts 2, 4, 5, 6, 7, 8, 9, and 10, in Dubois County, State of Indiana, the following named defendant, Leo Flores, did knowingly or intentionally possess or access with intent to view a motion picture or digitized image, to wit: a video; that depicted or described sexual conduct by a child who Leo Flores knew to be less than eighteen (18) years of age and/or who appeared to be less than eighteen (18) years of age, and that lacked serious literary, artistic, political or scientific value; and the child who was depicted or described was less than twelve (12) years of age.

years of age.

Count 4: On or between July 15, 2021 and June 30, 2022, at a time different than Counts 2, 3, 5, 6, 7, 8, 9, and 10, in Dubois County, State of Indiana, the following named defendant, Leo Flores, did knowingly or intentionally possess or access with intent to view a motion picture or digitized image, to wit: a video; that depicted or described sexual conduct by a child who Leo Flores knew to be less than eighteen (18) years of age and/or who appeared to be less than eighteen (18) years of age, and that lacked serious literary, artistic, political or scientific value; and the child who was depicted or described was less than twelve (12) years of age.

Count 5: On or between July 15, 2021 and June 30, 2022, at a time different than Counts 2, 3, 4, 6, 7, 8, 9, and 10, in Dubois County, State of Indiana, the following named defendant, Leo Flores, did knowingly or intentionally possess or access with intent to view a motion picture or digitized image, to wit: a video; that depicted or described sexual conduct by a child who Leo Flores knew to be less than eighteen (18) years of age and/or who appeared to be less than eighteen (18) years of age, and that lacked serious literary, artistic, political or scientific value; and the child who was depicted or described was less than twelve (12) years of age.

Count 6: On or between July 15, 2021 and June 30, 2022, at a time different than Counts 2, 3, 4, 5, 7, 8, 9, and 10, in Dubois County, State of Indiana, the following named defendant, Leo Flores, did knowingly or intentionally possess or access with intent to view a motion picture or digitized image, to wit: a video; that depicted or described sexual conduct by a child who Leo Flores knew to be less than eighteen (18) years of age and/or who appeared to be less than eighteen (18) years of age, and that lacked serious literary, artistic, political or scientific value; and the child who was depicted or described was less than twelve (12) years of age.

Count 7: On or between July 15, 2021 and June 30, 2022, at a time different than Counts 2, 3, 4, 5, 6, 8, 9, and 10, in Dubois County, State of Indiana, the following named defendant, Leo Flores, did knowingly or intentionally possess or access with intent to view a motion picture or digitized image, to wit: a video; that depicted or described sexual conduct by a child who Leo Flores knew to be less than eighteen (18) years of age and/or who appeared to be less than eighteen (18) years of age, and that lacked serious literary, artistic, political or scientific value; and the child who was depicted or described was less than twelve (12) years of age.

Count 8: On or between July 15, 2021 and June 30, 2022, at a time different than Counts 2, 3, 4, 5, 6, 7, 9, and 10, in Dubois County, State of Indiana, the following named defendant, Leo Flores, did knowingly or intentionally possess or access with intent to view a motion picture or digitized image, to wit: a video; that depicted or described sexual conduct by a child who Leo Flores knew to be less than eighteen (18) years of age and/or who appeared to be less than eighteen (18) years of age, and that lacked serious literary, artistic, political or scientific value; and the child who was depicted or described was less than twelve (12) years of age.

Count 9: On or between July 15, 2021 and June 30, 2022, at a time different than Counts 2, 3, 4, 5, 6, 7, 8, and 10, in Dubois County, State of Indiana, the following named defendant, Leo Flores, did knowingly or intentionally possess or access with intent to view a motion picture or digitized image, to wit: a video; that depicted or described sexual conduct by a child who Leo Flores knew to be less than eighteen (18) years of age and/or who appeared to be less than eighteen (18) years of age, and that lacked serious literary, artistic, political or scientific value; and the child who was depicted or described was less than twelve (12) years of age.

Count 10: On or between July 15, 2021 and June 30, 2022, at a time different than Counts 2, 3, 4, 5, 6, 7, 8, and 9, in Dubois County, State of Indiana, the following named defendant, Leo Flores, did knowingly or intentionally possess or access with intent to view a motion picture or digitized image, to wit: a video; that depicted or described sexual conduct by a child who Leo Flores knew to be less than eighteen (18) years of age and/or who appeared to be less than eighteen (18) years of age, and that lacked serious literary, artistic, political or scientific value; and the child who was depicted or described was less than twelve (12) years of age.

Count 11: On or between July 1, 2022 and February 10, 2023 in Dubois County, State of Indiana, the following named defendant, Leo Flores, with intent to view the image, did knowingly or intentionally possess or access an image that depicted or described sexual conduct by a child who was less than eighteen (18) years of age and/or by a person who appeared to be a child less than eighteen (18) years old and the representation of the image was obscene as described in I.C. 35-49-2-1; and the child who was depicted or described was less than twelve (12) years of age.

Count 12: On or about February 11, 2023 in Dubois County, State of Indiana, the following named defendant, Leo Flores, with intent to view the image, did knowingly or intentionally possess or access an image that depicted or described sexual conduct by a child who was less than eighteen (18) years of age and/or by a person who appeared to be a child less than eighteen (18) years old and the representation of the image was obscene as described in I.C. 35-49-2-1; and the child who was depicted or described was less than twelve (12) years of age.

Count 13: On or about February 11, 2023 in Dubois County, State of Indiana, the following named defendant, Leo Flores, with intent to view the image, did knowingly or intentionally possess or access an image (said image being a different image than that described in Count 12) that depicted or described sexual conduct by a child who was less than eighteen (18) years of age and/or by a person who appeared to be a child less than eighteen (18) years old and the representation of the image was obscene as described in I.C. 35-49-2-1; and the child who was depicted or described participated in the sexual conduct by use of force or the threat of force.

Count 14: On or about February 11, 2023 in Dubois County, State of Indiana, the following named defendant, Leo Flores, with intent to view the image, did knowingly or intentionally possess or access an image (said image being a different image than that described in Count 12) that depicted or described sexual conduct by a child who was less than eighteen (18) years of age and/or by a person who appeared

to be a child less than eighteen (18) years old and the representation of the image was obscene as described in I.C. 35-49-2-1; and the child who was depicted or described physically or verbally resisted participating in the sexual conduct.

All of which is contrary to the form of the Statute in such cases made and provided against the peace and dignity of the State of Indiana.

Dated: February 14, 2023

/s/ Brian D. Lucchi
BRIAN D. LUCCHI
Deputy Prosecuting Attorney

WITNESSES:

Rusty Drew
Derrick Beier
Case A. Cummings
Joshua Hemmer
Cole Meyer
Cody Shinn
[REDACTED]
Juvenile 1
Juvenile 2
Logan Humphrey
[REDACTED]
David Price
Richard Chambers