

RECEIVED
IN LAFAYETTE, LA.

MAR 16 2011

TONY R. MOORE, CLERK
BY RD DEPUTY

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

SHREVEPORT DIVISION

5:11CR000062

UNITED STATES OF AMERICA

VERSUS

JOHN DOE #1 (1)
a.k.a. blackbart2010

JOHN DOE #2 (2)
a.k.a. Dank0420

JOHN DOE #3 (3)
a.k.a. dfx

JOHN DOE #4 (4)
a.k.a. ee1

JOHN DOE #5 (5)
a.k.a. kfivicky1

JOHN DOE #6 (6)
a.k.a. SocratesWasAGeek

JOHN DOE #7 (7)
a.k.a. Mytink

JOHN DOE #8 (8)
a.k.a. fantom
a.k.a. fantomg
a.k.a. B.J.hunnicutt

JOHN DOE #9 (9)
a.k.a. almeda

JOHN DOE #10 (10)
a.k.a. Daddy-0

JOHN DOE #11 (11)
a.k.a. 14yrsmax

* CRIMINAL NO.

* 18 U.S.C. 2252A(g)
* 18 U.S.C. 2251(d)(1) & (e)
* 18 U.S.C. 2252A(a)(2)(A) & (b)(1)

* JUDGE HICKS

* MAGISTRATE JUDGE HORNSBY

JOHN DOE #12	(12)	*
a.k.a. davie		*
		*
JOHN DOE #13	(13)	*
a.k.a. hardon		*
		*
JOHN DOE #14	(14)	*
a.k.a. gonzo		*
		*
Jamil Lamar Mosley	(15)	*
a.k.a. clubkidsforever		*
		*
Anthony Paul Sowders	(16)	*
a.k.a. ChanChadwick		*
		*
Mohammed Jashimuddin N. Meah	(17)	*
a.k.a. juddinbest		*

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Engaging in a Child Exploitation Enterprise 18 U.S.C. 2252A(g)

Beginning on or about the 8th day of January, 2008, and continuing until on or about the 31st day of August, 2010, in the Western District of Louisiana and elsewhere, the defendants, JOHN DOE #1 a.k.a. blackbart2010, JOHN DOE #2 a.k.a. Dank0420, JOHN DOE #3 a.k.a. dfx, JOHN DOE #4 a.k.a. ee1, JOHN DOE #5 a.k.a. kficky1, JOHN DOE #6 a.k.a. SocratesWasAGeek, JOHN DOE #7 a.k.a. Mytink, JOHN DOE #8 a.k.a. fantom, a.k.a. fantomg, a.k.a. B.J.hunnicutt, JOHN DOE #9 a.k.a. almeda, JOHN DOE #10 a.k.a. Daddy-0, JOHN DOE #11 a.k.a. 14yrsmax, JOHN DOE #12 a.k.a. davie, JOHN DOE #13 a.k.a. hardon, JOHN DOE #14 a.k.a. gonzo, JAMIL LAMAR MOSLEY a.k.a. clubkidsforever, ANTHONY PAUL SOWDERS a.k.a. ChanChadwick, MOHAMMED JASHIMUDDIN N. MEAH a.k.a. juddinbest, and others known and

unknown to the Grand Jury, did engage in a child exploitation enterprise, as more fully described below:

THE ENTERPRISE

The Defendants were members of an Internet-based members-only bulletin board, entitled Dreamboard, (hereafter Dreamboard), the purpose of which was, among other things, the advertisement and distribution of child pornography. For purposes of this indictment, the term "child pornography" is as defined in Title 18 United States Code, Section 2256(8)(a).

Dreamboard was hosted by Certified Hosting Solutions, Inc. (hereafter Certified). Certified is a commercial web hosting company that was paid to host Dreamboard through a credit card associated with a Dreamboard member, who was a co-conspirator in the criminal activity.

The administrators of Dreamboard had specific requirements for allowing new members to join the board. Each member was required to post child pornography in order to become a member. Furthermore, in order for Dreamboard members to remain in good standing and avoid removal from the board, each member had to continue to post images of child pornography on Dreamboard.

In order to advertise the child pornography, members would post a description of the child pornography that they were making available for distribution. Some advertisements included sample images of the child pornography. In the advertisement, the members posting the advertisements provided the web site address where the child pornography was located and a password necessary to download the material.

All members of Dreamboard were encouraged and required to post images and videos of child pornography so that all members would have a massive and private library of child pornography available for viewing or download by members.

THE RULES OF DREAMBOARD

The rules of Dreamboard were printed in English, Russian, Japanese and Spanish, and were specific regarding the types of images that had to be posted in order to qualify for admission to Dreamboard. Those rules stated, in pertinent part:

- a. "If I see posts of girls with great big tits and a big black hairy bush, then you can fucking forget being made a member."
- b. "Keep the girls under 13, in fact, I really need to see 12 or younger to know your [sic] a brother."
- c. And don't avoid nudity in previews. I will NOT accept you, if theres [sic] no nudity. And my definition of nudity is pussy or anal in the shot. You just waste your own time if you don't do this. Because you will not get in, if you don't follow the rules."

The rules of Dreamboard had the following warnings posted which required members to continue to post child pornography or lose access to the Dreamboard:

- a. "If you haven't UPLOADED in 50 days, & login doesn't [sic] work, re-apply, because you have been DELETED."
- b. "Uploaders remain, TALKERS AND LURKERS who DON'T upload are deleted."

The rules of Dreamboard allowed members to join different sections of the board. One section of Dreamboard was titled "Super Hardcore." The rules controlling what could be posted in that section were as follows:

"Its very young kids, getting fucked, and preteens in distress, and or crying, ect... Getting hit hard on the ass, with a belt and so on . . I can't belive some of you guys can't work it out for yourselves? And "pretend" bondage, "Pretend light whipping" is not super hardcore. If the girl looks totall comfortable, she's not in distress, it does NOT belong I this section [smiley-face icon]"

Members of the Dreamboard were segregated into groups. If one were given membership to the Dreamboard, the administrator would dictate in which group the member would be placed. Each group of members had access to specific locations on the internet bulletin board where child pornography was advertised.

According to the rules of Dreamboard, groups included "Super VIP.", "Super VIP", VIP, and member.

According to the rules of Dreamboard, "Super VIP." members were producers of child pornography that advertised child pornography that they had produced as well as other child pornography that they offered for distribution.

According to the rules of Dreamboard, those who had attained the second highest level of membership, "Super VIP" members, were considered trusted members of the web site. As such they were able to see more posted advertisements than other members.

According to the rules of Dreamboard, the final two levels of membership were VIP members and members. Members of these levels have access to a restricted supply of child pornography. In order to move to a higher group on the Dreamboard and thereby obtain a broader access to child pornography, members must post more advertisements for child pornography, post advertisements for child pornography the member had produced, or post advertisements for child pornography that no other member possessed.

According to the rules of Dreamboard, members were to use encryption technologies in order to prevent detection. The rules went on to specify which encryption technologies should be used and which should be avoided.

Dreamboard members did not use their real names, but instead used screen names to conceal their identities. At all relevant time, each of the named defendants were members of Dreamboard.

VIOLATIONS OF CHILD PORNOGRAHY STATUTES COMMITTED BY THE CHILD EXPLOITATION ENTERPRISE

The child exploitation enterprise and the members therein, in concert with three or more persons, engaged in a series of three or more felony violations of Title 18 United States Code, Section 2251(d)(1), that is, advertising the display and/or distribution of child pornography, constituting three or more separate incidents and involved more than one victim. The advertisements included but are not limited to, the advertisements described more fully below:

1. On or about the 19th day of May, 2010, JOHN DOE #1 a.k.a. blackbart2010 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Goldbergvideos-visitors.avi*, which contained child pornography.
2. On or about the 8th day of June, 2010, JOHN DOE #1 a.k.a. blackbart2010 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Pedo-Vicky-The 107.mpeg*, which contained child pornography.
3. On or about the 19th day of June, 2010, JOHN DOE #1 a.k.a. blackbart2010 did knowingly publish on the Dreamboard Internet Bulletin

Board an advertisement offering to distribute the file entitled *14.mpg*, which contained child pornography.

4. On or about the 8th day of August, 2009, JOHN DOE #2 a.k.a. Dank0420, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *A bunch of somewhat random pics*, which contained child pornography.
5. On or about the 5th day of November, 2009, JOHN DOE #2 a.k.a. Dank0420, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *AnyCool_Sc*, which contained child pornography.
6. On or about the 13th day of February, 2010, JOHN DOE #2 a.k.a. Dank0420, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *(Pthc) HCB2-vhs-14.avi*, which contained child pornography.
7. On or about the 13th day of August, 2009, JOHN DOE #3 a.k.a. dfx, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *LS Magazine Issue 16*, which contained child pornography.
8. On or about the 6th day of May, 2010, JOHN DOE #3 a.k.a. dfx, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Elia-001.avi*, which contained child pornography.
9. On or about the 14th day of June, 2010, JOHN DOE #3 a.k.a. dfx, did knowingly publish on the Dreamboard Internet Bulletin Board an

advertisement offering to distribute the file entitled *Jenny 9yo Daughter-TV View 05.2007.avi*, which contained child pornography.

10. On or about the 27th of July, 2009, JOHN DOE #4 a.k.a. ee1 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *!!NEW!! Pthc ((Hussyfan)) nablot_1.avi*, which contained child pornography.
11. On or about the 1st day of August, 2009, JOHN DOE #4 a.k.a. ee1 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Sami-RaveVib1.mpg*, which contained child pornography.
12. On or about the 17th day of October, 2009, JOHN DOE #4 a.k.a. ee1 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Girl 4yo Bald Pussy Rubbing #100-1937.mov*, which contained child pornography.
13. On or about the 22nd day of September, 2009, JOHN DOE #5 a.k.a. kfucky1 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *toddler - man trying to penetrade toddler girl 3yo Gets It Every Way Imaginable.mpg*, which contained child pornography.
14. On or about the 28th day of October, 2009, JOHN DOE #5 a.k.a. kfucky1 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *ann - (((Kingpass))) New Ann Forest 02 (At Last She Gets It).avi*, which contained child pornography.

15. On or about the 22nd day of April, 2010, JOHN DOE #5 a.k.a. kfvicky1 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *St.Petersburg-104.avi*, which contained child pornography.
16. On or about the 6th day of March, 2010, JOHN DOE #6 a.k.a. SocratesWasAGeek did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Lolita Collection Vol1.avi*, which contained child pornography.
17. On or about the 7th day of March, 2010, JOHN DOE #6 a.k.a. SocratesWasAGeek did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *E-1 (lesbian).mpg*, which contained child pornography.
18. On or about the 17th day of March, 2010, JOHN DOE #6 a.k.a. SocratesWasAGeek did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Cambodia2 Anal And 3Bj.avi*, which contained child pornography.
19. On or about the 5th day of June, 2010, JOHN DOE #7 a.k.a. Mytink did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *((Hussyfan))(Pthc) - K - K!!! New - 5yo Rca (Marissa) - Young Girl lolita Pedo Fuck Brother.avi*, which contained child pornography.
20. On or about the 13th day of June, 2010, JOHN DOE #7 a.k.a. Mytink did knowingly publish on the Dreamboard Internet Bulletin Board an

advertisement offering to distribute the file entitled *Genuine Jail Bait*, which contained child pornography.

21. On or about the 20th day of June, 2010, JOHN DOE #7 a.k.a. Mytink did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Cute Little Vamp With Vibrator and Dad*, which contained child pornography.
22. On or about the 12th day of May, 2010, JOHN DOE #8 a.k.a. fantom, a.k.a. fantomg, a.k.a. B.J.hunnicutt did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *My Little Girls.wmv*, which contained child pornography.
23. On or about the 21st day of May, 2010, JOHN DOE #8 a.k.a. fantom, a.k.a. fantomg, a.k.a. B.J.hunnicutt did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Vicky SuckCum001.mpg*, which contained child pornography.
24. On or about the 12th day of June, 2010, JOHN DOE #8 a.k.a. fantom, a.k.a. fantomg, a.k.a. B.J.hunnicutt did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Collection of bj pix*, which contained child pornography.
25. On or about the 27th day of April, 2010, JOHN DOE #9 a.k.a. almeda did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *!new 2010 sweetbabys in bed – hot show!!.wmv*, which contained child pornography.
26. On or about the 7th day of June, 2010, JOHN DOE #9 a.k.a. almeda did knowingly publish on the Dreamboard Internet Bulletin Board an

advertisement offering to distribute the file entitled *Mule 2009*, which contained child pornography.

27. On or about the 10th day of June, 2010, JOHN DOE #9 a.k.a. almeda did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Varoius Sets*, which contained child pornography.
28. On or about the 19th day of April, 2010, JOHN DOE #10 a.k.a. Daddy-0 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *blond2*, which contained child pornography.
29. On or about the 25th day of April, 2010 at 04:57 a.m., JOHN DOE #10 a.k.a. Daddy-0 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Best – 14yo Models Wet Preteen Small Puffies with Shower Ma.avi*, which contained child pornography.
30. On or about the 25th day of April, 2010 at 05:38 a.m., JOHN DOE #10 a.k.a. Daddy-0 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Jenny Package (Pthc Ptsc 9yo Jenny Sucking Daddys Dog, Pthc Ptsc 9yo Jenny Smiling With Doggie Cock In Her Face, Pthc Ptsc 9yo Jenny Tied Up Nylons Waiting For Doggie)*, which contained child pornography.
31. On or about the 24th day of April, 2010, JOHN DOE #11 a.k.a. 14yrsmax did knowingly publish on the Dreamboard Internet Bulletin Board an

advertisement offering to distribute the file entitled *Girl with Dog 001.avi*, which contained child pornography.

32. On or about the 8th day of May, 2010, JOHN DOE #11 a.k.a. 14yrsmax did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Nice small sets*, which contained child pornography.
33. On or about the 24th day of May, 2010, JOHN DOE #11 a.k.a. 14yrsmax did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Candle.avi*, which contained child pornography.
34. On or about the 6th day of November, 2009 at 04:34 p.m., JOHN DOE #12 a.k.a. davie did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Vicky Pedofilia – The Secret Movie.wmv*, which contained child pornography.
35. On or about the 6th day of November, 2009 at 07:43 p.m., JOHN DOE #12 a.k.a. davie did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Rmix-04.bin*, which contained child pornography.
36. On or about the 7th day of November, 2009, JOHN DOE #12 a.k.a. davie did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *2006 Tara 8yr – littlr ass busted out – December 2006.avi*, which contained child pornography.
37. On or about the 16th day October, 2009, JOHN DOE #13 a.k.a. hardon did knowingly publish on the Dreamboard Internet Bulletin Board an

advertisement offering to distribute the file entitled *babyshivid-bathtime-inourworld_all.avi* which contained child pornography.

38. On or about the 11th day of November, 2009, JOHN DOE #13 a.k.a. hardon did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Matt, Clayton and Simon*, which contained child pornography.
39. On or about the 2nd day of June, 2010, JOHN DOE #13 a.k.a. hardon did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Vasia_Trio's_1-7(22min12sec).mpg*, which contained child pornography.
40. On or about the 1st day of November, 2009, JOHN DOE #14 a.k.a. gonzo did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Need your help*, which contained child pornography.
41. On or about the 5th day of November, 2009, JOHN DOE #14 a.k.a. gonzo did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Rona videos from set 31*, which contained child pornography.
42. On or about the 6th day of November, 2009, JOHN DOE #14 a.k.a. gonzo did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Gracel videos from set 32*, which contained child pornography.
43. On or about the 16th day of May, 2010, JAMIL LAMAR MOSLEY a.k.a. clubkidsforever did knowingly publish on the Dreamboard Internet Bulletin

Board an advertisement offering to distribute the file entitled *RF#4_001(inc).mpg*, which contained child pornography.

44. On or about the 17th day of May, 2010, JAMIL LAMAR MOSLEY a.k.a. clubkidsforever did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Home Made Sets*, which contained child pornography.
45. On or about the 8th day of June, 2010, JAMIL LAMAR MOSLEY a.k.a. clubkidsforever did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Rodrigo*, which contained child pornography.
46. On or about the 20th day of May, 2010, ANTHONY PAUL SOWDERS a.k.a. ChanChadwick did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *original dancer (2).flv*, which contained child pornography.
47. On or about the 26th day of May, 2010, ANTHONY PAUL SOWDERS a.k.a. ChanChadwick did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *YouTube – sexy video.flv*, which contained child pornography.
48. On or about the 7th day of June, 2010, ANTHONY PAUL SOWDERS a.k.a. ChanChadwick did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *em.avi*, which contained child pornography.
49. On or about the 21st day of April, 2010, MOHAMMED JASHIMUDDIN N. MEAH a.k.a. juddinbest did knowingly publish on the Dreamboard Internet

Bulletin Board an advertisement offering to distribute the file entitled *10008 Kgirl_(with sound finally).avi*, which contained child pornography.

50. On or about the 24th day of April, 2010 at 07:32 am, MOHAMMED JASHIMUDDIN N. MEAH a.k.a. juddinbest did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *10009 Kids Sex.avi*, which contained child pornography.

51. On or about the 24th day of April, 2010 at 07:33 am, MOHAMMED JASHIMUDDIN N. MEAH a.k.a. juddinbest did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *100010 Lolitabeach Hidden Camera.avi*, which contained child pornography.

All in violation of Title 18 United States Code, Section 2252A(g) [18 U.S.C. 2252A(g)].

COUNT 2

Conspiracy to Advertise the Distribution of Child Pornography 18 U.S.C. 2251(d)(1) & (e)

Beginning on or about the 8th day of January, 2008, and continuing until on or about the 31st day of August, 2010, in the Western District of Louisiana and elsewhere, the defendants, JOHN DOE #1 a.k.a. blackbart2010, JOHN DOE #2 a.k.a. Dank0420, JOHN DOE #3 a.k.a. dfx, JOHN DOE #4 a.k.a. ee1, JOHN DOE #5 a.k.a. kfvicky1, JOHN DOE #6 a.k.a. SocratesWasAGeek, JOHN DOE #7 a.k.a. Mytink, JOHN DOE #8 a.k.a. fantom, a.k.a. fantomg, a.k.a. B.J.hunnicutt, JOHN DOE #9 a.k.a. almeda, JOHN DOE #10 a.k.a. Daddy-0, JOHN DOE #11 a.k.a. 14yrsmax, JOHN DOE #12 a.k.a. davie, JOHN DOE #13 a.k.a. hardon, JOHN DOE #14 a.k.a. gonzo, JAMIL LAMAR MOSLEY

a.k.a. clubkidsforever, ANTHONY PAUL SOWDERS a.k.a. ChanChadwick, MOHAMMED JASHIMUDDIN N. MEAH a.k.a. juddinbest, and others both known and unknown to the Grand Jury, did knowingly and intentionally conspire, confederate, and agree together and with others, both known and unknown to the Grand Jury, to commit the crime of advertising the display and/or distribution of child pornography in violation of Title 18 United States Code, Section 2251(d)(1).

MANNER AND MEANS OF THE CONSPIRACY

The United States adopts the factual allegations presented in Count 1 of the Indictment as the manner and means of the conspiracy to advertise the distribution of child pornography.

All in violation of Title 18 United States Code, Section 2251(d)(1) &(e).

COUNT 3

Conspiracy to Distribute Child Pornography 18 U.S.C. 2252A(a)(2)(A) & (b)(1)

Beginning on or about the 8th day of January, 2008, and continuing until on or about the 31st day of August, 2010, in the Western District of Louisiana and elsewhere, the defendants, JOHN DOE #1 a.k.a. blackbart2010, JOHN DOE #2 a.k.a. Dank0420, JOHN DOE #3 a.k.a. dfx, JOHN DOE #4 a.k.a. ee1, JOHN DOE #5 a.k.a. kfvicky1, JOHN DOE #6 a.k.a. SocratesWasAGeek, JOHN DOE #7 a.k.a. Mytink, JOHN DOE #8 a.k.a. fantom, a.k.a. fantomg, a.k.a. B.J.hunnicutt, JOHN DOE #9 a.k.a. almeda, JOHN DOE #10 a.k.a. Daddy-0, JOHN DOE #11 a.k.a. 14yrsmax, JOHN DOE #12 a.k.a. davie, JOHN DOE #13 a.k.a. hardon, JOHN DOE #14 a.k.a. gonzo, JAMIL LAMAR MOSLEY a.k.a. clubkidsforever, ANTHONY PAUL SOWDERS a.k.a. ChanChadwick, MOHAMMED JASHIMUDDIN N. MEAH a.k.a. juddinbest, and others both known and


unknown to the Grand Jury, did knowingly and intentionally conspire, confederate, and agree together and with others, both known and unknown to the Grand Jury, to commit the crime of distribution of child pornography in violation of Title 18 United States Code, Section 2252A(a)(2)(A).

MANNER AND MEANS OF THE CONSPIRACY

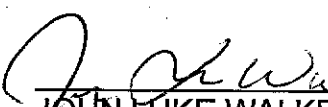
The United States adopts the factual allegations presented in Count 1 of the Indictment as the manner and means of the conspiracy to distribute child pornography.

All in violation of Title 18 United States Code, Section 2252A(a)(2)(A) & (b)(1).

A TRUE BILL:

 FOREPERSON: FEDERAL GRAND JURY

STEPHANIE A FINLEY
United States Attorney



JOHN LUKE WALKER Bar # 18077
Assistant United States Attorney
800 Lafayette Street, Suite 2200
Lafayette, Louisiana 70501-6832
Telephone: (337) 262-6618