

FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

2013 DEC 18 PM 2:07

MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE, FLORIDA

UNITED STATES OF AMERICA

v.

LEON PERRY BROOKS, SR.

CASE NO. 3:13-cr-~~0229~~-J-32JRK  
Cts. 1-3: 18 U.S.C. §§ 2252(a)(2)  
and 2252(b)(1)  
Ct. 4: 18 U.S.C. §§  
2252(a)(4)(B) and  
2252(b)(2)  
Forfeiture: 18 U.S.C. § 2253

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

On or about June 19, 2012, at approximately 6:21:35 p.m., at Jacksonville, in the Middle District of Florida,

LEON PERRY BROOKS, SR.,

the defendant herein, did knowingly receive a visual depiction using a means and facility of interstate and foreign commerce, that is, by computer via the internet, the production of which involved the use of a minor engaging in sexually explicit conduct, which visual depiction was of such conduct, and which visual depiction is specifically identified in the computer file titled "pthc – freaky latin parents and 5yr daughter.mpg".

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

**COUNT TWO**

On or about June 23, 2012, at approximately 1:10:07 a.m., at Jacksonville, in the Middle District of Florida,

LEON PERRY BROOKS, SR.,

the defendant herein, did knowingly receive a visual depiction using a means and facility of interstate and foreign commerce, that is, by computer via the internet, the production of which involved the use of a minor engaging in sexually explicit conduct, which visual depiction was of such conduct, and which visual depiction is specifically identified in the computer file titled "video – 8yr orgasm and anal fuck hard ! new ! (pthc) 2007 new girl img 0004(2).wmv".

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

**COUNT THREE**

On or about January 7, 2013, at Jacksonville, in the Middle District of Florida,

LEON PERRY BROOKS, SR.,

the defendant herein, did knowingly distribute a visual depiction using a means and facility of interstate and foreign commerce, that is, by computer via the internet, the production of which involved the use of a minor engaging in sexually explicit conduct, which visual depiction was of such conduct, and which visual depiction is specifically identified in the computer file titled "novinha de 12 (pthc).avi".

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

**COUNT FOUR**

On or about May 20, 2013, at Jacksonville, in the Middle District of Florida,

LEON PERRY BROOKS, SR.,

the defendant herein, did knowingly possess one (1) or more matters which contained visual depictions which were produced using materials which have been shipped and transported in or affecting interstate and foreign commerce, that is, a Hitachi computer hard disk drive, serial number 080802FB0200LCCBJ9UA, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which visual depictions were of such conduct, and which were specifically identified in the following computer files, among others:

1. 2 niñas ruias lesbianas de 12 y 11 años.avi

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

**FORFEITURE**

1. The allegations contained in Counts One through Four of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253.

2. The defendant, LEON PERRY BROOKS, SR., upon conviction of a violation of Title 18, United States Code, Section 2252, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253:

- a. any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such

visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18;

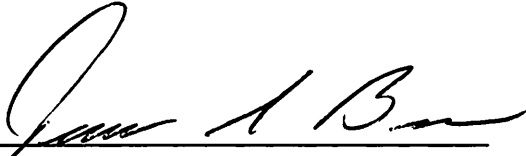
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

3. If any of the property described above, as a result of any act or omission of the defendant:

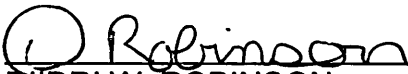
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,


the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

A TRUE BILL,

  
\_\_\_\_\_  
Foreperson

A. LEE BENTLEY, III  
Acting United States Attorney

By:   
\_\_\_\_\_  
DIDRI W. ROBINSON  
Assistant United States Attorney

By:   
\_\_\_\_\_  
JULIE HACKENBERRY  
Assistant United States Attorney  
Chief, Jacksonville Division

No.

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**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Jacksonville Division

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THE UNITED STATES OF AMERICA

vs.

LEON PERRY BROOKS, SR.

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**INDICTMENT**

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Violations:

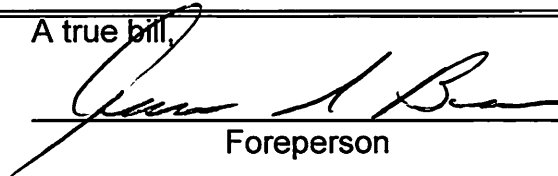
Cts. 1-3: 18 U.S.C. §§ 2252(a)(2) and 2252(b)(1)

Ct. 4: 18 U.S.C. §§ 2252(a)(4)(B) and 2252(b)(2)

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A true bill,


  
\_\_\_\_\_  
Foreperson

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Filed in open court this 18<sup>th</sup> day

of December, 2013.

  
\_\_\_\_\_  
Clerk

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Bail \$ \_\_\_\_\_

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