

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

UNITED STATES OF AMERICA,) No. 12-04059-01-CR-C-BCW
)
Plaintiff,) <u>Counts 1-7:</u>
v.) 18 U.S.C. § 2252(a)
) NLT 5 years; NMT 20 years
) and/or \$250,000
IAN FRANCIS BUROW,) Supervised Release: NLT 5 years up to Life
a/k/a “Sarah McGee”) Class C Felony
[DOB: 11/27/1989])
) <u>Count 8:</u>
Defendant.) 18 U.S.C. § 2251(a)
) NLT 15 years; NMT 30 years
) and/or \$250,000
) Supervised Release: NLT 5 years up to Life
) Class B Felony
)
) <u>Forfeiture Allegation</u>
) 18 U.S.C. § 2253(a)(3)
) Criminal Forfeiture
)
) \$100 mandatory penalty assessment, Counts 1-8
)

INDICTMENT

THE GRAND JURY CHARGES THAT:

Introduction - All Counts

At all times material:

1. A through G were persons under the age of eighteen.
2. IAN FRANCIS BUROW, defendant, created accounts, in his own name and in the name “Sarah McGee,” with various internet companies including Yahoo, Facebook and Skype. He used the “Sarah McGee” name and identity to communicate and to request, solicit, distribute

and receive messages, photos, and visual depictions, through and by a means and facility of interstate and foreign commerce, including the internet and by phone.

Counts 1-7

(Receiving and Distributing Sexually Explicit Material Involving a Minor)

3. On or about the dates set as forth below by count, in Boone County and elsewhere, in the Western District of Missouri, IAN FRANCIS BUROW, a/k/a “Sarah McGee,” defendant, did knowingly receive and distribute, and attempt to receive and distribute, any visual depiction using any means and facility of interstate commerce, and the production of such visual depiction involved the use of a minor, as set forth below by Count, engaging in sexually explicit conduct, and such visual depiction was of such conduct; in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).

Count	Date	Minor
1	December 27, 2010	A
2	January 29, 2011	B
3	January 29, 2011	C
4	January 30, 2011	D
5	May 22, 2011	E
6	May 22, 2011	E
7	July 30 to August 1, 2011	F

Count 8

(Production of Sexually Explicit Material Involving a Minor)

4. On or about October 14, 2011, in Boone County, and elsewhere, in the Western District of Missouri, IAN FRANCIS BUROW, a/k/a “Sarah McGee,” defendant, did knowingly

employ, use, persuade, induce, entice and coerce, and attempt to employ, use, persuade, induce, entice and coerce a minor (G) to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and which visual depiction was produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means; in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

FORFEITURE ALLEGATION
(Criminal Forfeiture)

1. The allegations contained in Counts 1-8 are realleged and incorporated by reference herein.

2. The following list of property is forfeited to the United States:

a. Any visual depiction described in Title 18, United States Code, Section 2252, and any matter which contains any such visual depiction, which was produced, transported, possessed, mailed, shipped, or received in violation of this section; and

b. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, including but not limited to, the following:

- 1) Blackberry Curve 8330, MEID 268435457313496820;
- 2) Apple iPad 16GB, serial number DLXGGLYNDFHW;
- 3) Apple iTouch 32GB, serial number 9C91755T208;
- 4) Dell Inspiron 1545 Laptop, serial number 1TGNBL1;
- 5) Seagate 1TB external hard drive, serial number NA0C0H5W;
- 6) Two DVDR disks;

- 7) Seagate 320GB external hard drive, serial number 2GE731MZ;
- 8) Great Rivers ID name badge;
- 9) PNY 2GB thumbdrive;
- 10) 5 envelopes and loose Boy Scout forms and handwritten note;
- 11) Photograph of nude adult female; and
- 12) Journal book with entries

All in violation of Title 18, United States Code, Section 2253(a)(3).

A TRUE BILL.

/s/

FOREPERSON OF THE GRAND JURY

/s/

ANTHONY P. GONZALEZ
Assistant United States Attorney
Missouri Bar No. 29922

Date: 11/7/12