

FILED
UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

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CLERK-LAS CRUCES *RL*

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAMES CARNEY RITTERHOFF,
a/k/a "Dominus37x,"

Defendant.

)
)
) CRIMINAL NO. 11-1955 WJ
)
) Count 1: 18 U.S.C. § 2422(b): Enticement
)
) Counts 2 and 3: 18 U.S.C. § 2252A
) (a)(3)(B)(ii): Soliciting a Visual Depiction of
) a Minor Engaging in Sexually Explicit
) Conduct; 18 U.S.C. § 2: Aiding and Abetting
)
) Count 4: 18 U.S.C. §§ 2252A (a)(6) and
) 2256: Sending Images of Minors Engaging In
) Sexually Explicit Conduct to a Minor to
) Induce the Minor to Commit an Illegal Act; 18
) U.S.C. § 2: Aiding and Abetting
)
) Counts 5 and 6: 18 U.S.C. §§ 2252 (a)(2),
) (b)(1), and 2256: Receiving a Visual
) Depiction of a Minor Engaging in Sexually
) Explicit Conduct; 18 U.S.C. § 2: Aiding and
) Abetting
)
) Count 7: 18 U.S.C. §§ 2252 (a)(4)(B) and
) 2256: Knowingly Possessing a Visual
) Depiction of a Minor Engaging in Sexually
) Explicit Conduct; 18 U.S.C. § 2: Aiding and
) Abetting

INDICTMENT

The Grand Jury charges:

Count 1

Beginning on or about February 23, 2011 and continuing through on or about June 6, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **JAMES CARNEY RITTERHOFF, a/k/a "Dominus37x,"** used a facility of interstate and foreign commerce to knowingly attempt to persuade, induce, entice and coerce an individual who had not attained the age of 18 years to engage in sexual activity for which a person could be charged with an offense.

In violation of 18 U.S.C. §§ 2422(b) and 2.

Count 2

On or about April 27, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **JAMES CARNEY RITTERHOFF, a/k/a "Dominus37x,"** did knowingly solicit, using a means or facility of interstate or foreign commerce and in or affecting interstate or foreign commerce by any means, including by computer, material in a manner that reflects the belief that the material contains a visual depiction of an actual minor engaging in sexually explicit conduct, to wit: the defendant asked another person to send him child pornographic videos of children 12 years of age and older.

In violation of 18 U.S.C. §§ 2252A (a)(3)(B), 2256, and 2.

Count 3

On or about May 3, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **JAMES CARNEY RITTERHOFF, a/k/a "Dominus37x,"** did knowingly solicit, using a means or facility of interstate or foreign commerce and in or affecting interstate or foreign commerce by any means, including by computer, material in a manner that reflects the belief that the material contains a visual depiction of an actual minor engaging in sexually explicit conduct, to wit: a live

web-cam feed of a mother performing sadistic sexually abusive acts on her thirteen-year-old daughter.

In violation of 18 U.S.C. §§ 2252A (a)(3)(B), 2256, and 2.

Count 4

Beginning on or about May 6, 2011 and continuing through on or about May 23, 2011, in Bernalillo County, in the District of New Mexico, the defendant, **JAMES CARNEY RITTERHOFF, a/k/a "Dominus37x,"** did knowingly attempt to distribute, offer, send, and provide to a minor a visual depiction, including any photograph, film, video, picture, and computer-generated image and picture, whether made or produced by electronic, mechanical, or other means, where such visual depiction is, or appears to be, of a minor engaging in sexually explicit conduct, to wit: hyperlinks to at least ten videos of females who appear to be under 18 years of age engaged in sexually explicit conduct, including sexual intercourse, masturbation, and lascivious exhibition of the genitals and pubic area, which visual depiction had been mailed, shipped and transported using any means or facility of interstate or foreign commerce and in or affecting interstate or foreign commerce by any means, including by computer, for the purpose of inducing and persuading a minor to participate in any activity that is illegal.

In violation of 18 U.S.C. §§ 2252A(a)(6), 2256, and 2.

Counts 5 and 6

On or about the dates set forth below, in Bernalillo County, in the District of New Mexico, the defendant, **JAMES CARNEY RITTERHOFF, a/k/a "Dominus37x,"** did knowingly receive a visual depiction contained in the computer files described below, which visual depiction had been mailed, shipped and transported in or affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped and transported in interstate and foreign

commerce by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct and is of such conduct:

Count	Description	Date Received	File Location
5	Photo of a minor female performing oral sex on an adult male. The girl is on a couch and the male is standing beside her.	June 6, 2011 at 12:20 a.m. EST	Acer Laptop computer serial number LXPJB020929421CA2B2000; AOL Desktop 9/ Dominus 37x/[deleted]/MA4043-0003
6	Photo of fingers touching a minor female's vagina.	June 6, 2011 at 12:23 a.m. EST	Acer Laptop computer serial number LXPJB020929421CA2B2000; AOL Desktop 9/ Dominus 37x/[deleted]/MA4043-0004

In violation of 18 U.S.C. §§ 2252(a)(2), 2252(b)(1), 2256, and 2.

Count 7

On or about September 22, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **JAMES CARNEY RITTERHOFF, a/k/a "Dominus37x,"** did knowingly possess an Acer Laptop Computer, model number MS2279, serial number LXPJB020929421CA2B2000, containing visual depictions that had been shipped and transported in and affecting interstate and foreign commerce and which were produced using materials which had been shipped and transported in interstate and foreign commerce, by any means, including by computer, the production of which

