

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

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## INDICTMENT FOR AGGRAVATED SEXUAL ABUSE, PRODUCTION OF MATERIALS INVOLVING THE SEXUAL EXPLOITATION OF MINORS, COERCION AND ENTICEMENT OF A MINOR, TRANSFER OF OBSCENE MATERIALS TO A MINOR, RECEIPT OF MATERIALS INVOLVING THE SEXUAL EXPLOITATION OF MINORS, AND NOTICE OF FORFEITURE

#### UNITED STATES OF AMERICA

v.

# SECTION:

**CRIMINAL NUMBER:** 

MICHAEL G. MEANY

\* VIOLATION: 18 U.S.C. § 2241(c) 18 U.S.C. § 2251(a)
\* 18 U.S.C. § 2422(b) 18 U.S.C. § 2422(b)
\* 18 U.S.C. § 1470
\* 18 U.S.C. § 2252(a)(2)
18 U.S.C. § 2253

The Grand Jury charges that:

#### COUNT 1

### (Aggravated Sexual Abuse)

# A. <u>AT ALL TIMES MATERIAL HEREIN:</u>

1. MICHAEL G. MEANY, JR., DOB 08/15/1971, was a resident of the Eastern

District of Louisiana living on Lake Avenue in Metairie, Louisiana.

2. MICHAEL G. MEANY, JR. utilized personal computers, the Internet and cellular phones as facilities of interstate commerce to engage in communications with minors throughout the United States; including Louisiana, Maine, and Mississippi.

3. MICHAEL G. MEANY, JR. communicated with minors using Teenspot.com, MySpace.com, Yahoo!, AOL Instant Messenger Service (AIM), and Stickam.com.

4. MICHAEL G. MEANY, JR. established profiles of 14 and 15 year old boys on MySpace.com and other Internet social networking websites in order to meet minor girls.

5. **MICHAEL G. MEANY, JR.** claimed to have approximately 200 underage friends on MySpace.com.

6. MICHAEL G. MEANY, JR. claimed he had sexually explicit communications with as many as 100 minor girls; several of whom sent him sexually explicit images.

7. Specifically, **MICHAEL G. MEANY**, **JR.** used the following screen names, among others, to communicate with minors: "Mcowboy35@yahoo.com";

"ceneemo13@yahoo.com"; "Me.again69@yahoo.com"; "Tommythompson89@yahoo.com";

"Blah.blahh66@yahoo.com"; "Racerx1535@yahoo.com"; "Aitsme28@yahoo.com";

"Jsm2332000@yahoo.com"; "Jsm233@yahoo.com"; "Wthwtf19@yahoo.com";

"Helloagain@yahoo.com"; and "racerbobx@aol.com."

**B.** On or about July 28, 2009, **MICHAEL G. MEANY**, **JR.**, defendant herein, intentionally crossed a state line and knowingly engaged in a sexual act with another person who has attained the age of 12 years but has not attained the age of 16 years, identified as Victim 1, when the defendant traveled to Mississippi where he engaged in sexual activity with Victim 1;

All in violation of Title 18, United States Code, 2241(c).

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#### COUNT 2

### (Production of Child Pornography)

**A.** The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

**B.** On or about March 31, 2010 and April 1, 2010, within the Eastern District of Louisiana, and elsewhere, **MICHAEL G. MEANY**, **JR.**, defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, identified as Victim 1, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256 for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce;

In violation of Title 18, United States Code, Section 2251(a).

#### COUNT 3

# (Coercion and Enticement of a Minor)

**A.** The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. Beginning in January 2009 and continuing until in or about June 2009, MICHAEL G.
MEANY, JR., defendant herein, did knowingly use and attempt to use a means of interstate
commerce, to wit: computers, the Internet, and cellular phones, to persuade, induce, entice, and
coerce an individual, identified as Victim 2, who has not attained the age of 18 years, to engage
in sexual activity for which the defendant can be charged with a criminal offense;

All in violation of Title 18, United States Code, Section 2422(b).

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#### COUNT 4

### (Coercion and Enticement of a Minor)

**A.** The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

B. Beginning in January 2009 and continuing until on or about June 23, 2009, MICHAEL
G. MEANY, JR., defendant herein, did knowingly use and attempt to use a means of interstate commerce, to wit: computers, the Internet, and cellular phones, to persuade, induce, entice, and coerce an individual, identified as Victim 2, who has not attained the age of 18 years, to engage in sexual activity for which the defendant can be charged with a criminal offense;

All in violation of Title 18, United States Code, Section 2422(b).

#### COUNT 5

# (Transfer of Obscene Material to a Minor)

**A.** The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

**B.** From on or about November 15, 2008, through on or about February 27, 2009, in the Eastern District of Louisiana, and elsewhere, the defendant, **MICHAEL G. MEANY, JR.**, did knowingly attempt to transfer, by means of a facility of interstate commerce, that is, a computer, obscene matter to another individual, identified as "Victim 3" who has not attained the age of 16 years;

All in violation of Title 18, United States Code, Section 1470.

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#### COUNT 6

#### (Receipt of Child Pornography)

**A.** The allegations contained in Part A of Count 1 are hereby re-alleged and incorporated herein by reference.

**B.** Beginning at a time unknown and continuing to on or about October 29, 2009, within the Eastern District of Louisiana, and elsewhere, **MICHAEL G. MEANY**, **JR**., defendant herein, did knowingly receive visual depictions, that is, digital images, computer images, and digital video files, that had been mailed, shipped, and transported in interstate and foreign commerce, by any means, including by computer, the production of such visual depictions having involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such visual depictions were of such conduct;

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

#### FORFEITURE ALLEGATION

1. The allegations of this indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 2253.

2. If convicted of the offense or offenses set forth above, **MICHAEL G. MEANY** JR., the defendant herein, shall forfeit to the United States any and all materials and property used and intended to be used in the receipt and possession of visual depictions of minors engaging in sexually explicit conduct, and any and all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense. Such property includes, but is not limited to, the following specific items found by law enforcement on or about October 29, 2009:

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- 1) Toshiba Satellite Laptop, Serial number: 59233102Q;
- 2) Emachines W3107 Desktop computer, 50017927;
- 3) Motorola TFC139B Cellular Phone, MSN: F32GHC2WQM;
- 4) Samsung SCH-U706 Cellular Phone, HEX: A1000000A3787E;
- 5) Samsung SCH-R600 Cellular Phone, HEX: A0000014C11A34.

A TRUE BILL:

Foreperson

JIM LETTEN (8517) UNITED STATES ATTORNEY

JAN MASELLI MANN (9020)

First Assistant United States Attorney Chief, Criminal Division

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JAMES R. MANN (20513) Assistant United States Attorney

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BRIAN M. KLEBBA Assistant United States Attorney

New Orleans, Louisiana March 5, 2010

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