

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No.
v.)	
)	Violations: Title 18, United States Code,
BRADLEY J. AMES,)	Sections 2251(a) and (e), 2252A(a)(2)
)	and 2

COUNT ONE

The SPECIAL JANUARY 2015 GRAND JURY charges:

1. At times material to this indictment:

a. Skype was a voice over internet protocol service and instant messaging service. The service allowed users to communicate with peers by voice using a microphone, video by using a webcam, and instant messaging over the internet. It also allowed for file transfer. Users could transfer files to each other by using the “file transfer” function, or by pasting the file into the “edit” field on the instant messaging screen.

b. Upon registering with Skype, an individual had to provide his or her name and email address, and had to choose a unique “Skype Name.” An individual’s “Skype Name” appeared with each instant message, with his or her provided name in parentheses next to that chosen “Skype Name.”

c. Between September 2012, and November 2013, the following chosen “Skype Names” were registered with the following provided names:

- i. Skype Name “Travlrcell,” with name “Ryan A”;
- ii. Skype Name “ryan.anderson261,” with name “Ryan Anderson”;
- iii. Skype Name “honeybunchesofhannah,” with name “Hannah Stuart”;
and,
- iv. Skype Name “katakioftheakatsuki,” with name “[Co-conspirator A].”

d. PayPal was a business that allowed an individual with an email address and bank or credit card account to send and receive money over the internet. Upon registering with PayPal, an individual was asked to provide an email address and a bank or credit card account. PayPal also allowed its users to deposit cash in their accounts for retail transactions by purchasing a “Green Dot MoneyPak” card for cash, which card had a unique identification number. When a user sent money through PayPal, PayPal automatically generated a payment confirmation that was emailed to both parties to the transaction. The emailed confirmation provided the details of the transaction, which could include the amount of money transferred, the parties’ identities and email addresses, and/or an individual’s shipping address.

e. Facebook owned and operated a free-access social networking website of the same name that could be accessed at <http://www.facebook.com>. Facebook allowed its users to establish accounts with Facebook, and users could then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

f. Defendant BRADLEY J. AMES resided in Chicago, in the Northern District of Illinois. He coached youth basketball and used the Skype Names “travlr cell” and “ryan.anderson261.” He also used the alias names of “Ryan Anderson,” “Ryan,” and “Brian.”

2. Beginning no later than August 2012, and continuing to on or about November 4, 2013, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRADLEY J. AMES,

defendant herein, did knowingly conspire with Co-conspirator A, and others, to employ, use, persuade, induce, and entice boys under the age of 18, including Victims A through D, to engage in various forms of sexually explicit conduct, for the purpose of producing visual depictions of such conduct, which visual depictions were produced and transmitted using materials that had been transported in and affecting interstate and foreign commerce, and which visual depictions were transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate commerce.

3. It was part of the conspiracy that defendant AMES and Co-conspirator A agreed to and did select and target boys under the age of 18 for the purpose of inducing those minor boys to engage in sexually explicit conduct while being photographed and video recorded, and then transmit such photographs and video recordings over the internet.

4. It was further part of the conspiracy that Co-conspirator A utilized a Facebook profile and page established under a fictitious female identity, namely,

“Hannah,” in order to encourage young males to share photographs and information about themselves.

5. It was further part of the conspiracy that defendant AMES selected minors who had communicated with Co-conspirator A under his fictitious female identity on Facebook for the purpose of Co-conspirator A obtaining photographs and video recordings of those minors engaged in sexually explicit conduct.

6. It was further part of the conspiracy that defendant AMES identified at least one minor, through a boy personally known to defendant AMES from when he coached youth basketball, for the purpose of Co-conspirator A obtaining photographs and video recordings of that minor engaged in sexually explicit conduct, by providing Co-conspirator A with a link to the Facebook page for that minor.

7. It was further part of the conspiracy that Co-conspirator A utilized his fictitious female identity in order to communicate with minors selected and identified by defendant AMES in order to induce those minors into providing Co-conspirator A with photographs and video recordings via webcam of those minors engaging in sexually explicit conduct.

8. It was further part of the conspiracy that defendant AMES and Co-conspirator A offered to pay and paid minors amounts ranging from approximately \$100 to approximately \$650 in return for those minors allowing themselves to be photographed and video recorded while engaging in sexually explicit conduct.

9. It was further part of the conspiracy that defendant AMES sometimes paid Co-conspirator A for inducing and obtaining photographs and video recordings of minors

engaging in sexually explicit conduct and, on occasion, for Co-conspirator A engaging in sexually explicit conduct with those minors.

10. It was further part of the conspiracy that defendant AMES and Co-conspirator A agreed that Co-conspirator A would transmit the obtained sexually graphic photographs and video recordings to defendant AMES via Skype and Co-conspirator A did transmit, and defendant AMES did receive, the obtained photographs and recordings via Skype.

11. It was further part of the conspiracy that defendant AMES and Co-conspirator A hid and concealed the conspiracy and the acts done in furtherance of the conspiracy;

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about December 19, 2012, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRADLEY J. AMES,

defendant herein, knowingly employed, used, persuaded, induced and enticed a minor, namely, Victim A, to engage in sexually explicit conduct, namely, masturbation, for the purpose of producing a visual depiction of such conduct, which visual depiction was produced and transmitted using materials that had been transported in and affecting interstate and foreign commerce, and which visual depiction was transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate commerce;

In violation of Title 18, United States Code, Sections 2251(a) and 2.

COUNT THREE

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about April 6, 2013, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRADLEY J. AMES,

defendant herein, knowingly used, employed, persuaded, induced and enticed a minor, namely, Victim B, to engage in sexually explicit conduct, namely, sexual intercourse, for the purpose of producing a visual depiction of such conduct, which visual depiction was produced and transmitted using materials that had been transported in and affecting interstate and foreign commerce, and which visual depiction was transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate commerce;

In violation of Title 18, United States Code, Sections 2251(a) and 2.

COUNT FOUR

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about May 30, 2013, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRADLEY J. AMES,

defendant herein, knowingly employed, used, persuaded, induced and enticed a minor, namely, Victim C, to engage in sexually explicit conduct, namely, masturbation, for the purpose of producing a visual depiction of such conduct, which visual depiction was produced and transmitted using materials that had been transported in and affecting interstate and foreign commerce, and which visual depiction was transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate commerce;

In violation of Title 18, United States Code, Sections 2251(a) and 2.

COUNT FIVE

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about July 25, 2013, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRADLEY J. AMES,

defendant herein, knowingly employed, used, persuaded, induced and enticed a minor, namely, Victim D, to engage in sexually explicit conduct, namely, masturbation, for the purpose of producing a visual depiction of such conduct, which visual depiction was produced and transmitted using materials that had been transported in and affecting interstate and foreign commerce, and which visual depiction was transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate commerce;

In violation of Title 18, United States Code, Sections 2251(a) and 2.

COUNT SIX

The SPECIAL JANUARY 2015 GRAND JURY further charges:

On or about August 11, 2013, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRADLEY J. AMES,

defendant herein, knowingly received child pornography as defined in Title 18, United States Code, Section 2256(8)(A), namely, a video file titled “vcam_skype – 14yo and 10yo brothers jerk, suck, cum.avi,” that had been transported in and affecting interstate commerce using a means and facility of interstate commerce;

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY