

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DOUGLAS A. WILLIS

No.

Violations: Title 18, United States Code,
Sections 2251(a) and 2251(d)

INDICTMENT

COUNT ONE

The SPECIAL FEBRUARY 2016 GRAND JURY charges:

1. Beginning no later than on or about September 25, 1993, and continuing until at least in or about August 2001, at Naperville, in the Northern District of Illinois, Eastern Division, and elsewhere,

DOUGLAS A. WILLIS,
defendant herein, did conspire with Individual A to knowingly employ, use, persuade, induce, and entice boys under the age of 18 to engage in sexually explicit conduct, for the purpose of producing visual depictions of such conduct, which visual depictions were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce.

2. It was part of the conspiracy that defendant WILLIS and Individual A agreed that Individual A would recruit boys under the age of 18 to engage in sexual acts and pose for nude photographs and videos in exchange for money.

3. It was further part of the conspiracy that after recruiting these boys, Individual A brought the boys to defendant WILLIS's residence.

4. It was further part of the conspiracy that the boys were given controlled substances and alcohol in order to gain their compliance and reduce their inhibitions.

5. It was further part of the conspiracy that defendant WILLIS took photographs and videos of boys displaying their genitals in a lewd and lascivious manner and having sexual acts

performed upon them by Individual A.

6. It was further part of the conspiracy that on occasion, Individual A took photographs and videos of boys while defendant WILLIS performed sexual acts upon them.

7. It was further part of the conspiracy that Individual A and defendant WILLIS paid boys after the boys had posed for photographs and videos.

8. It was further part of the conspiracy that after Individual A and defendant WILLIS took the photographs and videos, Individual A kept copies of the photographs and videos.

9. It was further part of the conspiracy that defendant WILLIS and Individual A hid and concealed the conspiracy and the acts done in furtherance of the conspiracy. For example, after having taken photographs and videos of at least one boy engaged in sexually explicit conduct when the boy was a minor, once that boy turned 18, defendant WILLIS requested that he sign a contract acknowledging that he was 18 years old, and defendant WILLIS made a copy of that boy's identification.

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

COUNT TWO

The SPECIAL FEBRUARY 2016 GRAND JURY further charges:

Between in or about 1999 and in or about August 2001, at Naperville, in the Northern District of Illinois, Eastern Division, and elsewhere,

DOUGLAS A. WILLIS,

defendant herein, did knowingly employ, use, persuade, induce, and entice a minor, namely, Victim A, to engage in sexually explicit conduct that included the lewd and lascivious exhibition of Victim A's genitals and oral-genital intercourse, for the purpose of producing visual depictions of such conduct, which visual depictions were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce;

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

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY