

OCT 25 2017

JULIA C. DUDLEY, CLERK
BY: 
DEPUTY CLERK

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
AT CHARLOTTESVILLE
OCTOBER 2017 SESSION

UNITED STATES OF AMERICA

)

INDICTMENT

v.

)

Criminal No. *3:17-cr-00014*

RICHARD ALAN WELLBELOVED-STONE

)

18 U.S.C. §§ 2251(a), 2252(a)(4)(B),
2251(e), and 2252(b)(2)

)

COUNT ONE

The Grand Jury charges:

1. That between in or about 2011 and in or about 2014, the exact date(s) being unknown to the Grand Jury, in the Western Judicial District of Virginia, the defendant, RICHARD ALAN WELLBELOVED-STONE, did employ, use, persuade, induce, entice, and coerce, and did attempt to employ, use, persuade, induce, entice, and coerce Minor 1, who was then a prepubescent minor under the age of 18 years old, to engage in sexually explicit conduct, for the purpose of producing one or more visual depiction(s) of such conduct, which visual depiction(s) was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

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

COUNT TWO

The Grand Jury further charges:

1. That on or about May 18, 2017, in the Western Judicial District of Virginia, the defendant, RICHARD ALAN WELLBELOVED-STONE, did employ, use, persuade, induce, entice, and coerce

Minor 2, who was then a prepubescent minor under the age of 18 years old, to engage in sexually explicit conduct, for the purpose of producing one or more visual depiction(s) of such conduct, which visual depiction(s) was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

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

COUNT THREE

The Grand Jury further charges:

1. That on or about May 20, 2017, in the Western Judicial District of Virginia and elsewhere, the defendant, RICHARD ALAN WELLBELOVED-STONE, did employ, use, persuade, induce, entice, and coerce Minor 2, who was then a prepubescent minor under the age of 18 years old, to engage in sexually explicit conduct, for the purpose of producing one or more visual depiction(s) of such conduct, which visual depiction(s) was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

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

COUNT FOUR

The Grand Jury further charges:

1. That on or about July 25, 2017, in the Western Judicial District of Virginia, the defendant, RICHARD ALAN WELLBELOVED-STONE, did knowingly possess at least one matter which contained a visual depiction(s) that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce, and that was produced using materials which had been mailed,

and shipped and transported using any means and facility of interstate and foreign commerce, including by computer, and the production of such visual depiction(s) involved the use of a minor engaging in sexually explicit conduct, and such visual depiction(s) was of such conduct, and further that such image(s) included at least one depiction that involved a minor who had not attained 12 years of age.

2. In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

NOTICE OF FORFEITURE

1. Upon conviction of one or more of the felony offenses alleged in this Indictment, the defendant shall forfeit to the United States:

- a. any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of law, pursuant to 18 U.S.C. § 2253(a)(1),
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from said violation of law, pursuant to 18 U.S.C. § 2253(a)(2), and
- c. any property, real or personal used or intended to be used to commit or to promote the commission of said violation of law, or any property traceable to such property, pursuant to 18 U.S.C. § 2253(a)(3).

2. The property to be forfeited to the United States includes but is not limited to the following property:

- a. All such material containing the above-described visual depictions,
- b. One (1) iPhone cellular telephone, model A1661, IMEI: 353819083209045,
- c. One (1) iPhone cellular telephone, model A1453, IMEI: 358757050616724,

- d. One (1) Samsung cellular telephone, Model SPH-D720, MAC: 8C71F857996A, DEC: 268435460203220080,
- e. One (1) Lacie external hard drive, serial number NL31TKEX,
- f. One (1) Lacie external hard drive, serial number 14441111120284QR, and
- g. One (1) Apple MacBook Pro laptop, serial number W8023011AGX.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence,
- b. has been transferred or sold to, or deposited with a third person,
- c. has been placed beyond the jurisdiction of the Court,
- d. has been substantially diminished in value, or
- e. has been commingled with other property which cannot be subdivided without difficulty,

then it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL, this 25 day of October 2017.

/s/FOREPERSON
FOREPERSON

po 
RICK A. MOUNTCASTLE
ACTING UNITED STATES ATTORNEY