

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division



UNITED STATES OF AMERICA

v.

BRADLEY ROBERT SEGERT,

Defendant.

Criminal No. 1:18-CR-340

Count 1: 18 U.S.C. § 2252(a)(2) & (b)(1)
Conspiracy to Receive & Distribute Child
Pornography

Count 2: 18 U.S.C. § 2252(a)(2) & (b)(1)
Distribution of Child Pornography

Count 3: 18 U.S.C. § 2252(a)(2) & (b)(1)
Receipt of Child Pornography

Forfeiture Notice: 18 U.S.C. § 2253(a)

INDICTMENT

September 2018 Term – at Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Receive & Distribute Child Pornography)

1. Beginning at least in or about January 2015 and continuing until in or about August 2015, within the Eastern District of Virginia, and elsewhere, the defendant, BRADLEY ROBERT SEGERT, together with EDWARD THOMAS PARSONS and other individuals unknown to the grand jury, did knowingly conspire and agree to receive and distribute any visual depiction using any means and facility of interstate and foreign commerce and that had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means including by computer, in which the production of such visual depiction involved the use of a minor engaging

in sexually explicit conduct (referred to herein as “child pornography”), and such visual depiction was of such conduct, including but not limited to actual and simulated sexual intercourse and the lascivious exhibition of the genitals and pubic area of any person.

Object of the Conspiracy

2. The object of the conspiracy was to distribute and receive images and videos of minors engaged in sexually explicit conduct to and from other members of the conspiracy. Specifically, the object of the conspiracy was to distribute and receive child pornography through a private chat group via a messaging application.

Manner and Means of the Conspiracy

3. Since at least in or about January 2015 and continuing until in or about August 2015, BRADLEY ROBERT SEGERT and EDWARD THOMAS PARSONS operated and administered a private chat group on Kik Messenger (“Kik”), a messaging application that users can download to a mobile telephone or other mobile device and use to chat with other users under self-created usernames. One method of communication on Kik is direct messages between two users. Kik also permits users to create private chat groups capable of hosting up to fifty (50) users in which the users can communicate in a group setting and exchange images and videos with each other. These groups are administered by the groups’ creators, who have the authority to invite users to join the groups and to remove or ban users from accessing them.

4. BRADLEY ROBERT SEGERT and EDWARD THOMAS PARSONS acted as administrators of a private Kik chat group through which members, including the defendant, shared images and videos of child pornography.

5. BRADLEY ROBERT SEGERT and EDWARD THOMAS PARSONS required users who were interested in becoming members of the group to send them images and videos of

child pornography through Kik direct messages in order to gain admission. Whichever defendant obtained the child pornography from the prospective member would share it with the other, and the defendant, along with EDWARD THOMAS PARSONS, would then determine whether to extend an invitation to join the private group to that prospective member.

6. Beginning at least in or about January 2015 and continuing until at least in or about August 2015, BRADLEY ROBERT SEGERT and EDWARD THOMAS PARSONS shared with each other, and discussed over Kik, information about the prospective and actual members of a Kik chat group, the child pornography that the defendant had obtained from these prospective and actual members, and the child pornography these prospective and actual members might be able to provide.

(All in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1)).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT 2
(Distribution of Child Pornography)

7. Between in or about January 2015 and in or about August 2015, within the Eastern District of Virginia, and elsewhere, the defendant, BRADLEY ROBERT SEGERT did knowingly distribute, and attempt to distribute, any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means including by computer, the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, to wit: BRADLEY ROBERT SEGERT distributed, and attempted to distribute, visual depictions of minor children engaging in sexually explicit conduct, including but not limited to, actual and simulated sexual intercourse and the lascivious exhibition of the genitals and pubic area of any person.

(In violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1)).

THE GRAND JURY FURTHER CHARGES THAT:

COUNT 3
(Receipt of Child Pornography)

8. Between in or about January 2015 and in or about August 2015, within the Eastern District of Virginia, and elsewhere, the defendant, BRADLEY ROBERT SEGERT, did knowingly receive, and attempt to receive, any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means, including by computer, the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, to wit: BRADLEY ROBERT SEGERT received, and attempted to receive, visual depictions of minor children engaging in sexually explicit conduct, including but not limited to, actual and simulated sexual intercourse and the lascivious exhibition of the genitals and pubic area of any person.

(All in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1)).

FORFEITURE NOTICE

The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging criminal forfeiture to the United States of America of certain property in which the defendant, BRADLEY ROBERT SEGERT, has an interest.

Pursuant to Title 18, United States Code, Section 2253(a), upon a conviction for violating Title 18, United States Code, Section 2252, the defendant, BRADLEY ROBERT SEGERT, shall forfeit to the United States any and all matters which contain any visual depiction of minors engaged in sexually explicit conduct in violation of the charged offense; and/or any property, real or personal, constituting or traceable to any proceeds the defendant obtained directly or indirectly as a result of the above violation; and any and all property used, or intended to be used, to commit and to promote the commission of the aforementioned violation, including, but not limited to:

1. A desktop computer in a black Fatal1ty case containing a 1TB HGST hard drive S/N JPW9K0N135VRT;
2. A 4TB external Seagate hard drive S/N NA5KXAMR;
3. A Samsung cell phone containing a 128 GB microSD SanDisk memory card S/N 058F00016372;
4. A desktop computer in a black Fatal1ty case containing a 80 GB Seagate hard drive S/N 5LR467AJ;
5. A 4TB external Seagate hard drive S/N E3A4JJHF40089C;
6. A 128GB Corsair Survivor USB thumb drive;

7. A desktop computer in a black Fatal1ty case containing a 5TB Seagate hard drive S/N W4J00HQR; and
8. A 32 GB Memorex USB thumb drive.

If property subject to forfeiture is not available, the government may seek an order forfeiting substitute assets.

A TRUE BILL

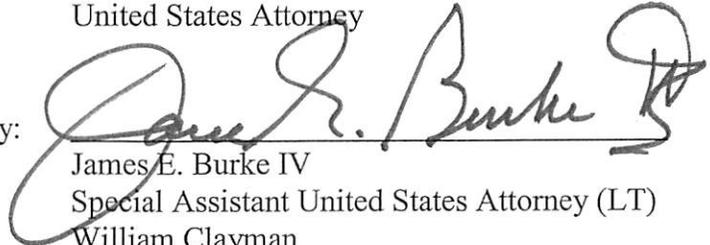
Pursuant to the E-Government Act,
The original of this document has been filed
under seal in the Clerk's Office

DATE

FOREPERSON

G. Zachary Terwilliger
United States Attorney

By:



James E. Burke IV
Special Assistant United States Attorney (LT)
William Clayman
Special Assistant United States Attorney (LT)
Gwendelynn Bills
Special Assistant United States Attorney (LT)