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UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

SHREVEPORT DIVISION

UNITED STATES OF AMERICA		* CRIMINAL NO. 10-CR-00319
VERSUS		* 18 U.S.C. 2252A(g) * 18 U.S.C. 2251(d)(1) & (e) * 18 U.S.C. 2252A(a)(2)(A) &(b)(1) * 18 U.S.C. 2253(a)(1)(3)
JOHN DOE #1 a.k.a. Hawkeye	(1)	* JUDGE HICKS
EDWARD OEDEWALDT a.k.a. twelvish a.k.a. Legend	(2)	* MAGISTRATE JUDGE HORNSBY * *
BRANDON WILLIAM LANE a.k.a. BossHiaka	(3)	* *
FRANCK GILBERT PION a.k.a. Ibro	(4)	* * *
JOHN DOE #4 a.k.a. Pervfesser	(5)	* * *
JOHN DOE #5 a.k.a. Dasha4Ever	(6)	* * *
JOHN DOE #6 a.k.a. Hasness2009	(7)	* * *
DESMOND T. MEREDITH a.k.a. Beast	(8)	* * *
THOMAS RUHLAND a.k.a. Mabuhay	(9)	*
DOUWE MARCEL VAN DE LAA a.k.a. Cixx	AR (10)	* * * * *
BRIAN MUSOMBA MAWEU a.k.a. Catfish	(11)	* * *
JOHN DOE #10 a.k.a. kimkim	(12)	*

JOHN DOE #11 a.k.a. Demian	(13) **
JOHN DOE #13 a.k.a. Erewe	(15) **
JOHN WYSS a.k.a. Bones	(16) **
ROBERT SPRAGUE a.k.a. Jailbird	(17)
LARRY J. RIDLEY a.k.a. Athf	(18) *
JOHN DOE #17 a.k.a. sonnyshade	(19) *
DAVID B. LINDSAY a.k.a. Slipnslide	(20)
DANIEL DESCHENES a.k.a. Catman	(21)
JOHN DOE #20 a.k.a. Todluvr	(22) **
JOHN DOE #22 a.k.a. Blaine	(24) **
MICHEAL VAN THOMPSON a.k.a. SamSneed	(25) **
CHARLES CHRISTIAN a.k.a. NLN	(26)
PAUL GRAHAM FRY a.k.a. Lofty	(27)

THIRD SUPERCEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Engaging in a Child Exploitation Enterprise 18 U.S.C. 2252A(g)

Beginning on or about the 8th day of January, 2008, and continuing until on or about the 31st day of August, 2010, in the Western District of Louisiana and elsewhere, the defendants, JOHN DOE #1 a.k.a. Hawkeye, EDWARD OEDEWALDT a.k.a. twelvish, a.k.a. Legend, BRANDON WILLIAM LANE a.k.a BossHiaka, FRANCK GILBERT PION a.k.a. Ibro, JOHN DOE #4 a.k.a. Pervfesser, JOHN DOE #5 a.k.a. Dasha4Ever, JOHN DOE #6 a.k.a. Hasness2009, DESMOND T. MEREDITH a.k.a. Beast, THOMAS RUHLAND a.k.a. Mabuhay, DOUWE MARCEL VAN DE LAAR a.k.a. Cixx, BRIAN MUSOMBA MAWEU a.k.a. Catfish, JOHN DOE #10 a.k.a. kimkim, JOHN DOE #11 a.k.a. Demian, JOHN DOE #13 a.k.a. Erewe, JOHN WYSS a.k.a. Bones, ROBERT SPRAGUE a.k.a. Jailbird, LARRY J. RIDLEY a.k.a. Athf, JOHN DOE #17 a.k.a. sonnyshade, DAVID B. LINDSAY a.k.a. Slipnslide, DANIEL DESCHENES a.k.a. Catman, JOHN DOE #20 a.k.a. Todluvr, JOHN DOE #22 a.k.a. Blaine, MICHEAL VAN THOMPSON a.k.a. SamSneed, CHARLES CHRISTIAN a.k.a. NLN, and PAUL GRAHAM FRY a.k.a. Lofty, and others known and unknown to the Grand Jury, did engage in a child exploitation enterprise, as more fully described below:

THE ENTERPRISE

The Defendants were members of an Internet-based members-only bulletin board, entitled Dreamboard, (hereafter Dreamboard), the purpose of which was, among other things, the advertisement and distribution of child pornography. For purposes of

this indictment, the term "child pornography" is as defined in Title 18 United States Code, Section 2256(8)(a).

Dreamboard was hosted by Certified Hosting Solutions, Inc. (hereafter Certified).

Certified is a commercial web hosting company that was paid to host Dreamboard through a credit card associated with Dreamboard member, BRIAN MUSOMBA MAWEU, a.k.a. Catfish.

The administrators of Dreamboard had specific requirements for allowing new members to join the board. Each member was required to post child pornography in order to become a member. Furthermore, in order for Dreamboard members to remain in good standing and avoid removal from the board, each member had to continue to post images of child pornography on Dreamboard.

In order to advertise the child pornography, members would post a description of the child pornography that they were making available for distribution. Some advertisements included sample images of the child pornography. In the advertisement, the members posting the advertisements provided the web site address where the child pornography was located and a password necessary to download the material.

All members of Dreamboard were encouraged and required to post images and videos of child pornography so that all members would have a massive and private library of child pornography available for viewing or download by members.

THE RULES OF DREAMBOARD

The rules of Dreamboard were printed in English, Russian, Japanese and Spanish, and were specific regarding the types of images that had to be posted in order to qualify for admission to Dreamboard. Those rules stated, in pertinent part:

- a. "If I see posts of girls with great big tits and a big black hairy bush, then you can fucking forget being made a member."
- b. "Keep the girls under 13, in fact, I really need to see 12 or younger to know your [sic] a brother."
- c. And don't avoid nudity in previews. I will NOT accept you, if theres [sic] no nudity. And my definition of nudity is pussy or anal in the shot. You just waste your own time if you don't do this. Because you will not get in, if you don't follow the rules."

The rules of Dreamboard had the following warnings posted which required members to continue to post child pornography or lose access to the Dreamboard:

- a. "If you haven't UPLOADED in 50 days, & login doesn't [sic] work, re-apply, because you have been DELETED."
- b. "Uploaders remain, TALKERS AND LURKERS who DON'T upload are deleated."

The rules of Dreamboard allowed members to join different sections of the board.

One section of Dreamboard was titled "Super Hardcore." The rules controlling what could be posted in that section were as follows:

"Its very young kids, getting fucked, and preteens in distress, and or crying, ect... Getting hit hard on the ass, with a belt and so on . I can't belive some of you guys can't work it out for yourselves? And "pretend" bondage, "Pretend light whipping" is not super hardcore. If the girl looks totall comfortable, she's not in distress, it does NOT belong I this section [smiley-face icon]"

Members of the Dreamboard were segregated into groups. If one were given membership to the Dreamboard, the administrator would dictate in which group the

member would be placed. Each group of members had access to specific locations on the internet bulletin board where child pornography was advertised.

According to the rules of Dreamboard, groups included "Super VIP.", "Super VIP", VIP, and member.

According to the rules of Dreamboard, "Super VIP." members were producers of child pornography that advertised child pornography that they had produced as well as other child pornography that they offered for distribution.

According to the rules of Dreamboard, those who had attained the second highest level of membership, "Super VIP" members, were considered trusted members of the web site. As such they were able to see more posted advertisements than other members.

According to the rules of Dreamboard, the final two levels of membership were VIP members and members. Members of these levels have access to a restricted supply of child pornography. In order to move to a higher group on the Dreamboard and thereby obtain a broader access to child pornography, members must post more advertisements for child pornography, post advertisements for child pornography the member had produced, or post advertisements for child pornography that no other member possessed.

According to the rules of Dreamboard, members were to use encryption technologies in order to prevent detection. The rules went on to specify which encryption technologies should be used and which should be avoided.

Dreamboard members did not use their real names, but instead used screen names to conceal their identities. At all relevant time, each of the named defendants were members of Dreamboard.

VIOLATIONS OF CHILD PORNOGRAHY STATUTES COMMITTED BY THE CHILD EXPLOITATION ENTERPRISE

The child exploitation enterprise and the members therein, in concert with three or more persons, engaged in a series of three or more felony violations of Title 18 United States Code, Section 2251(d)(1), that is, advertising the display and/or distribution of child pornography, constituting three or more separate incidents and involved more than one victim. The advertisements included but are not limited to, the advertisements described more fully below:

- 1. On or about the 7th day of August, 2008, JOHN DOE #1 a.k.a. Hawkeye did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled VHS(NQ) Ru boy and girl.avi, which contained child pornography.
- 2. On or about the 7th day of August, 2008, JOHN DOE #1 a.k.a. Hawkeye did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *DeeDesi-FULL.mpg*, which contained child pornography.
- 3. On or about the 17th day of November, 2008, JOHN DOE #1 a.k.a. Hawkeye did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Lolitas Rika* 12yo_Kayoko 12yo.mpg, which contained child pornography.
- 4. On or about the 7th day of November, 2009, EDWARD OEDEWALDT a.k.a. twelvish, a.k.a. Legend, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *My fairy-Ayako Parks*, which contained child pornography.

- 5. On or about the 9th day of November, 2009, EDWARD OEDEWALDT a.k.a. twelvish, a.k.a. Legend, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled BDMag5-v01_0.05.avi, which contained child pornography.
- 6. On or about the 10th day of November, 2009, EDWARD OEDEWALDT a.k.a. twelvish, a.k.a. Legend, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Elia-s1-RedLagoon.avi*, which contained child pornography.
- 7. On or about the 28th day of May, 2009, BRANDON WILLIAM LANE a.k.a. BossHiaka, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Mystery Girl, Inquiry from SweetAsian*, which contained child pornography.
- 8. On or about the 19th day of April, 2010, BRANDON WILLIAM LANE a.k.a. BossHiaka, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *lera.mpg*, which contained child pornography.
- 9. On or about the 9th day of June, 2010, BRANDON WILLIAM LANE a.k.a. BossHiaka, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *TJ-CharleneDad.rmvb*, which contained child pornography.
- 10. On or about the 4th day of April, 2009, FRANCK GILBERT PION a.k.a. Ibro, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Kids Box-Jasmin 02-Fucking.mpg*, which contained child pornography.

- 11. On or about the 12th day of January, 2010, FRANCK GILBERT PION a.k.a. Ibro, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled Amusing Kids Galia3.avi, which contained child pornography.
- 12. On or about the 20st day of January, 2010, FRANCK GILBERT PION a.k.a. Ibro, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled Amusing Kids: 41 Photo Sets, which contained child pornography.
- 13. On or about the 13th day of April, 2009, JOHN DOE #4 a.k.a. Pervfesser did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled (*Pthc*)!!!!New!!!! Caution 01Full Defloration.avi, which contained child pornography.
- 14. On or about the 18th day of May, 2009, JOHN DOE #4 a.k.a. Pervfesser, did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Cum on Baby, SHC Warning: Crying Baby*, which contained child pornography.
- 15. On or about the 12th day of June, 2010, JOHN DOE #4 a.k.a. Pervfesser did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Lesinka Collection*, which contained child pornography.
- On or about the 27th day of September, 2009, JOHN DOE #5 a.k.a. Dasha4Ever did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Maria-13yo03* (fucking).mpg, which contained child pornography.

- 17. On or about the 28th day of February, 2010, JOHN DOE #5 a.k.a. Dasha4Ever did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *HindooV830.mpg*, which contained child pornography.
- 18. On or about the 1st day of June, 2010, JOHN DOE #5 a.k.a. Dasha4Ever did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 2009 HC Suck Private Daughter (4yo).avi, which contained child pornography.
- 19. On or about the 24th day of June, 2009, JOHN DOE #6 a.k.a. Hasness2009 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Fantasia Rosy Ruby Ria New Video 01.wmv*, which contained child pornography.
- 20. On or about the 9th day of May, 2010, JOHN DOE #6 a.k.a. Hasness2009 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled ® 6yo Sharon New Private 2010®.wmv, which contained child pornography.
- 21. On or about the 26th day of May, 2010, JOHN DOE #6 a.k.a. Hasness2009 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Five Days Five Vids.wmv*, which contained child pornography.
- 22. On or about the 27th day of June, 2009, DESMOND T. MEREDITH a.k.a. Beast did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Puberty. Sexual*

- Exucation for Boys and Girls (1991) Belgium.avi, which contained child pornography.
- 23. On or about the 24th day of February, 2010, DESMOND T. MEREDITH a.k.a. Beast did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled Set of pictures labeled BD Young Strawberry, which contained child pornography.
- 24. On or about the 7th day of November, 2010, DESMOND T. MEREDITH a.k.a. Beast did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Angelica & friend.MIB*, which contained child pornography.
- 25. On or about the 1st day of October, 2009, THOMAS RUHLAND a.k.a. Mabuhay did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *p1 pussy blowjob swallow.mpg*, which contained child pornography.
- 26. On or about the 6th day of October, 2009, THOMAS RUHLAND a.k.a. Mabuhay did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Gracel Set 40.mpg*, which contained child pornography.
- 27. On or about the 6th day of June, 2010, THOMAS RUHLAND a.k.a. Mubuhay did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *nizr.mpg*, which contained child pornography.

- 28. On or about the 4th day of October, 2009, DOUWE MARCEL VAN DE LAAR a.k.a. Cixx did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled Raeana 5yo & Little Bro #0002.wmv, which contained child pornography.
- 29. On or about the 7th day of October, 2009, DOUWE MARCEL VAN DE LAAR a.k.a. Cixx did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled (Private) Cute Melissa-I touche myself-Cixx 2009-Db-HM.mp4, which contained child pornography.
- 30. On or about the 2nd day of November, 2009, DOUWE MARCEL VAN DE LAAR a.k.a. Cixx did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled (*Private*) Cute Melissa Bed Stripping-Cixx2009-DB-HM.mp4, which contained child pornography.
- 31. On or about the 25th day of June, 2009, BRIAN MUSOMBA MAWEU a.k.a. Catfish did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Rain.FLV*, which contained child pornography.
- 32. On or about the 30th day of July, 2009, BRIAN MUSOMBA MAWEU a.k.a. Catfish did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *chakacha.rar*, which contained child pornography.
- 33. On or about the 31th day of December, 2009, BRIAN MUSOMBA MAWEU a.k.a. Catfish did knowingly publish on the Dreamboard Internet Bulletin

- Board an advertisement offering to distribute the file entitled *ruffian.avi*, which contained child pornography.
- 34. On or about the 14th day of May, 2010, JOHN DOE #10 a.k.a. kimkim did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *BD-Mag_01_0D1_2Lelya.avi*, which contained child pornography.
- 35. On or about the 25th day of May, 2010, JOHN DOE #10 a.k.a. kimkim did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *BD-Mag_04_xx_Marina* (aka-LUCY aka TANYA #1).avi, which contained child pornography.
- 36. On or about the 18th day of June, 2010, JOHN DOE #10 a.k.a. kimkim did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Bd-mag_07_02_Polina* schP_7.07 AKA LudaB.avi, which contained child pornography.
- 37. On or about the 22nd day of March, 2009, JOHN DOE #11 a.k.a. Demian did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Cherry-Orales.lmorTales.wmv*, which contained child pornography.
- 38. On or about the 21st day of July, 2009, JOHN DOE #11 a.k.a. Demian did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 2009 Gracel Series hard blowjob (with cum).mpg, which contained child pornography.
- 39. On or about the 30th day of September, 2009, JOHN DOE #11 a.k.a.

 Demian did knowingly publish on the Dreamboard Internet Bulletin Board

- an advertisement offering to distribute the file entitled taras-fuckh.wmv, which contained child pornography.
- 40. On or about the 17th day of October, 2009, JOHN DOE #13 a.k.a. Erewe did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 2009 3yo VCLP0091(28s).avi, which contained child pornography.
- 41. On or about the 10th day of November, 2009, JOHN DOE #13 a.k.a. Erewe did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *May 2nd*, 2008 (not compressed)5.avi, which contained child pornography.
- 42. On or about the 9th day of January, 2010, JOHN DOE #13 a.k.a. Erewe did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 27.01.2004.avi, which contained child pornography.
- 43. On or about the 15th day of December 2009, JOHN WYSS a.k.a. Bones did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Vicky's Story.mpg*, which contained child pornography.
- 44. On or about the 18th day of December, 2009, JOHN WYSS a.k.a. Bones did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *cuty baby 002.avi*, which contained child pornography.
- 45. On or about the 28th day of December, 2009, JOHN WYSS a.k.a. Bones did knowingly publish on the Dreamboard Internet Bulletin Board an

- advertisement offering to distribute the file entitled *lollipop4A.avi*, which contained child pornography.
- 46. On or about the 7th day of July, 2009, ROBERT SPRAGUE a.k.a. Jailbird did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Pthc Babyshivid Babyj* 4Yo Catheter Urethra Russian Doctor.MIB, which contained child pornography.
- 47. On or about the 3rd day of October, 2009, ROBERT SPRAGUE a.k.a. Jailbird did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *LSM-08-05-01.MIB*, which contained child pornography.
- 48. On or about the 4th day of April, 2010, ROBERT SPRAGUE a.k.a. Jailbird did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Caution 6Yo Indian Girl* (*Kleuterkutje*).avi, which contained child pornography.
- 49. On or about the 26th day of March, 2010, LARRY J. RIDLEY a.k.a. Athf did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Pose Shower Spread Tease* (10 you ptsc).avi, which contained child pornography.
- 50. On or about the 28th day of March, 2010, LARRY J. RIDLEY a.k.a. Athf did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 00004625 2yo assfuck she cries for mommy nasty pthc pedo 1yo 3yo 4yo.mpg, which contained child pornography.

- 51. On or about the 19th day of May, 2010, LARRY J. RIDLEY a.k.a. Athf did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 2010 (Specvial Trde)(Judy set unknown)07 cum in mouth).mpg, which contained child pornography.
- 52. On or about the 10th day of March, 2010, JOHN DOE #17 a.k.a. sonnyshade did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 2010!!! NEW!!

 Tara 8y suck and fuck june 10th 2008 (uncensored)(RPEX3).avi, which contained child pornography.
- 53. On or about the 6th day of June, 2010, JOHN DOE #17 a.k.a. sonnyshade did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Keito 11-12 y.o. Japanese boy with man*, which contained child pornography.
- 54. On or about the 13th day of June, 2010, JOHN DOE #17 a.k.a. sonnyshade did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *bad little boy gets caned!.flv*, which contained child pornography.
- 55. On or about the 8th day of July, 2009, DAVID B. LINDSAY a.k.a. Slipnslide did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Phone.rar*, which contained child pornography.
- 56. On or about the 4th day of October, 2009, DAVID B. LINDSAY a.k.a. Slipnslide did knowingly publish on the Dreamboard Internet Bulletin

- Board an advertisement offering to distribute the file entitled *UP3.rar*, which contained child pornography.
- 57. On or about the 15th day of May, 2010, DAVID B. LINDSAY a.k.a.

 Slipnslide did knowingly publish on the Dreamboard Internet Bulletin

 Board an advertisement offering to distribute the file entitled "Making Sex

 Nordic Vanish", which contained child pornography.
- 58. On or about the 27th day of July, 2009, DANIEL DESCHENES a.k.a. Catman did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *14 Inna custom nude sets!!*, which contained child pornography.
- 59. On or about the 22nd day of September, 2009, DANIEL DESCHENES a.k.a. Catman did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 299 candid nudies 4 to 10 yrs old, which contained child pornography.
- 60. On or about the 7th day of June, 2010, DANIEL DESCHENES a.k.a. Catman did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Ulia5.avi*, which contained child pornography.
- On or about the 5th day of May, 2010, JOHN DOE #20 a.k.a. Todluvr did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *gshower.wmv*, which contained child pornography.
- 62. On or about the 2nd day of June, 2010, JOHN DOE #20 a.k.a. Todluvr did knowingly publish on the Dreamboard Internet Bulletin Board an

- advertisement offering to distribute the file entitled *Kbaby-Clit*, *Gina*, *Asshole.wmv*, which contained child pornography.
- 63. On or about the 3rd day of June, 2010, JOHN DOE #20 a.k.a. Todluvr did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Kansas.avi*, which contained child pornography.
- 64. On or about the 12th day of April, 2009, JOHN DOE #22 a.k.a. Blaine did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *aard_789'.avi*, which contained child pornography.
- On or about the 13th day of April, 2009, JOHN DOE #22 a.k.a. Blaine did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *spongebob getting fucked (16sec).avi*, which contained child pornography.
- 66. On or about the 17th day of June, 2010, JOHN DOE #22 a.k.a. Blaine did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Purification Ceremony* 1.mpg, which contained child pornography.
- 67. On or about the 17th day of August, 2009, MICHEAL VAN THOMPSON a.k.a. SamSneed did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 3 yo anal baby KK, which contained child pornography.
- 68. On or about the 10th day of January, 2010, MICHEAL VAN THOMPSON a.k.a. SamSneed did knowingly publish on the Dreamboard Internet

- Bulletin Board an advertisement offering to distribute the file entitled R@ygold-I like it.mpg, which contained child pornography.
- 69. On or about the 7th day of June, 2010, MICHEAL VAN THOMPSON a.k.a. SamSneed did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Mylola-Jaxy* 6.avi, which contained child pornography.
- 70. On or about the 26th day of May, 2010, CHARLES CHRISTIAN a.k.a. NLN did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Lolita sex party*, which contained child pornography.
- 71. On or about the 1st day of June, 2010, CHARLES CHRISTIAN a.k.a. NLN did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *cherish model*, which contained child pornography.
- 72. On or about the 18th day of June, 2010, CHARLES CHRISTIAN a.k.a.

 NLN did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Lolitafix*, which contained child pornography.
- 73. On or about the 17th day of May, 2010, PAUL GRAHAM FRY a.k.a. Lofty did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file *entitled* !!! New Pthc-11yo Evelyne 2010!!!.mpg, which contained child pornography.
- 74. On or about the 5th day of June, 2010, PAUL GRAHAM FRY a.k.a. Lofty did knowingly publish on the Dreamboard Internet Bulletin Board an

- advertisement offering to distribute the file entitled (PT) Young Girls & Boy taught How To Suck on Cam 01.avi, which contained child pornography.
- 75. On or about the 20th day of June, 2010, PAUL GRAHAM FRY a.k.a. Lofty did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled Webcam 2010 Mybaby (3yo daughter) Special Private Trade.wmv, which contained child pornography.

All in violation of Title 18 United States Code, section 2252A(g) [18 U.S.C. 2252A(g)].

COUNT 2

Conspiracy to Advertise the Distribution of Child Pornography 18 U.S.C. 2251(d)(1) & (e)

Beginning on or about the 8th day of January, 2008, and continuing until on or about the 31st day of August, 2010, in the Western District of Louisiana and elsewhere, the defendants, JOHN DOE #1 a.k.a. Hawkeye, EDWARD OEDEWALDT a.k.a. twelvish, a.k.a. Legend, BRANDON WILLIAM LANE a.k.a BossHiaka, FRANCK GILBERT PION a.k.a. Ibro, JOHN DOE #4 a.k.a. Pervfesser, JOHN DOE #5 a.k.a. Dasha4Ever, JOHN DOE #6 a.k.a. Hasness2009, DESMOND T. MEREDITH a.k.a. Beast, THOMAS RUHLAND a.k.a. Mabuhay, DOUWE MARCEL VAN DE LAAR a.k.a. Cixx, BRIAN MUSOMBA MAWEU a.k.a. Catfish, JOHN DOE #10 a.k.a. kimkim, JOHN DOE #11 a.k.a. Demian, JOHN DOE #13 a.k.a. Erewe, JOHN WYSS a.k.a. Bones, ROBERT SPRAGUE a.k.a. Jailbird, LARRY J. RIDLEY a.k.a. Athf, JOHN DOE #17 a.k.a. sonnyshade, DAVID B. LINDSAY a.k.a. Slipnslide, DANIEL DESCHENES a.k.a.

Catman, JOHN DOE #20 a.k.a. Todluvr, JOHN DOE #22 a.k.a. Blaine, MICHEAL VAN THOMPSON a.k.a. SamSneed, CHARLES CHRISTIAN a.k.a. NLN, and PAUL GRAHAM FRY a.k.a. Lofty, and others both known and unknown to the Grand Jury, did knowingly and intentionally conspire, confederate, and agree together and with others, both known and unknown to the Grand Jury, to commit the crime of advertising the display and/or distribution of child pornography in violation of Title 18 United States Code, Section 2251(d)(1).

MANNER AND MEANS OF THE CONSPIRACY

The United States adopts the factual allegations presented in Count 1 of the Indictment as the manner and means of the conspiracy to advertise the distribution of child pornography.

All in violation of Title 18 United States Code, Section 2251(d)(1) &(e).

COUNT 3

Conspiracy to Distribute Child Pornography 18 U.S.C. 2252A(a)(2)(A) & (b)(1)

Beginning on or about the 8th day of January, 2008, and continuing until on or about the 31st day of August, 2010, in the Western District of Louisiana and elsewhere, the defendants, JOHN DOE #1 a.k.a. Hawkeye, EDWARD OEDEWALDT a.k.a. twelvish, a.k.a. Legend, BRANDON WILLIAM LANE a.k.a BossHiaka, FRANCK GILBERT PION a.k.a. Ibro, JOHN DOE #4 a.k.a. Pervfesser, JOHN DOE #5 a.k.a. Dasha4Ever, JOHN DOE #6 a.k.a. Hasness2009, DESMOND T. MEREDITH a.k.a. Beast, THOMAS RUHLAND a.k.a. Mabuhay, DOUWE MARCEL VAN DE LAAR a.k.a. Cixx, BRIAN MUSOMBA MAWEU a.k.a. Catfish, JOHN DOE #10 a.k.a. kimkim, JOHN DOE #11 a.k.a. Demian, JOHN DOE #13 a.k.a. Erewe, JOHN WYSS a.k.a. Bones,

ROBERT SPRAGUE a.k.a. Jailbird, LARRY J. RIDLEY a.k.a. Athf, JOHN DOE #17 a.k.a. sonnyshade, DAVID B. LINDSAY a.k.a. Slipnslide, DANIEL DESCHENES a.k.a. Catman, JOHN DOE #20 a.k.a. Todluvr, JOHN DOE #22 a.k.a. Blaine, MICHEAL VAN THOMPSON a.k.a. SamSneed, CHARLES CHRISTIAN a.k.a. NLN, and PAUL GRAHAM FRY a.k.a. Lofty, and others both known and unknown to the Grand Jury, did knowingly and intentionally conspire, confederate, and agree together and with others, both known and unknown to the Grand Jury, to commit the crime of distribution of child pornography in violation of Title 18 United States Code, Section 2252A(a)(2)(A).

MANNER AND MEANS OF THE CONSPIRACY

The United States adopts the factual allegations presented in Count 1 of the Indictment as the manner and means of the conspiracy to distribute child pornography.

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

COUNT 4

Forfeiture 18 U.S.C. 2253(a)(3)

Upon conviction of one or more of the felony offenses alleged in this Indictment, the defendants, JOHN DOE #1 a.k.a. Hawkeye, EDWARD OEDEWALDT a.k.a. twelvish, a.k.a. Legend, BRANDON WILLIAM LANE a.k.a BossHiaka, FRANCK GILBERT PION a.k.a. Ibro, JOHN DOE #4 a.k.a. Pervfesser, JOHN DOE #5 a.k.a. Dasha4Ever, JOHN DOE #6 a.k.a. Hasness2009, DESMOND T. MEREDITH a.k.a. Beast, JOHN DOE #8 a.k.a. Mabuhay, DOUWE MARCEL VAN DE LAAR a.k.a. Cixx, BRIAN MUSOMBA MAWEU a.k.a. Catfish, JOHN DOE #10 a.k.a. kimkim, JOHN DOE #11 a.k.a. Demian, JOHN DOE #13 a.k.a. Erewe, JOHN WYSS a.k.a. Bones, ROBERT SPRAGUE a.k.a. Jailbird, LARRY J. RIDLEY a.k.a. Athf, JOHN DOE #17 a.k.a. sonnyshade, DAVID B. LINDSAY a.k.a. Slipnslide, DANIEL DESCHENES a.k.a.

Catman, JOHN DOE #20 a.k.a. Todluvr, JOHN DOE #22 a.k.a. Blaine, MICHEAL VAN THOMPSON a.k.a. SamSneed, CHARLES CHRISTIAN a.k.a. NLN, and PAUL GRAHAM FRY a.k.a. Lofty, shall forfeit to the United States.

- A. any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 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 Title 18 United States Code, Section 2253(a)(1);
- any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from said violation of law, pursuant to Title 18,
 United States Code, Section 2252(a)(2); and,
- C. any property, real or personal, used or intended to be used to commit or promote the commission of such violation of law, pursuant to Title 18, United States Code, Section 2253(a)(3).

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

- Sony Memory Stick 2 GB Sandisk Cruzer, seized from the defendant,
 DESMOND T. MEREDITH, a.k.a. Beast, on November 16, 2010;
- Apple MacBook Pro SN# K64LT8A286E2 with cord seized from the defendant, DESMOND T. MEREDITH, a.k.a. Beast, on November 16, 2010;
- 3. Xbox seized from the defendant, DESMOND T. MEREDITH, a.k.a. Beast, on November 16, 2010;

- Sony Camera with Media, SN# 583571 seized from the defendant,
 DESMOND T. MEREDITH, a.k.a. Beast, on November 16, 2010;
- Thumbdrive found in eyeglass case seized from the defendant, DESMOND T.
 MEREDITH, a.k.a. Beast, on November 16, 2010;
- 6. Sony PSP seized from the defendant, DESMOND T. MEREDITH, a.k.a. Beast, on November 16, 2010;
- 7. 4 cruzer thumbdrives, 2 8GB, 1 1.0 GB and 1 2.0 GB seized from the defendant, DESMOND T. MEREDITH, a.k.a. Beast, on November 16, 2010;
- 16 CD's and 33 floppy disks seized from the defendant, DESMOND T.
 MEREDITH, a.k.a. Beast, on November 16, 2010;
- 1998 Freightliner Tractor, VIN Number 1FUYDZYB1WP784215, seized from the defendant, JOHN WYSS, a.k.a. Bones, on November 6, 2010;
- 10. Generic desktop computer containing a Western Digital WD1001FALS hard drive SN# WMATV384251 seized from the defendant, ROBERT SPRAGUE, a.k.a. Jailbird;
- 11. Seagate 500 GB hard drive model number ST350020AS, SN# 9QM472LW, seized from the defendant, LARRY J. RIDLEY, a.k.a. Athf, on November 17, 2010;
- 12. Seagate, model 1.5 terabyte Freeagent hard drive, SN# 2GEYZGNO, seized from the defendant, LARRY J. RIDLEY, a.k.a. Athf, on November 17, 2010;
- 13. Seagate, model 1.5 terabyte Freeagent hard drive, SN# 2GEYZJ04, seized from the defendant, LARRY J. RIDLEY, a.k.a. Athf, on November 17, 2010;
- 14. Cisco, model USB 3.8 gigabyte Flip F460B, SN# LB0901901324, seized from the defendant, LARRY J. RIDLEY, a.k.a. Athf, on November 17, 2010;

- 15. Cisco, model USB 3.8 gigabyte Flip F460B, SN# LB0907200964, seized from the defendant, LARRY J. RIDLEY, a.k.a. Athf, on November 17, 2010;
- 16. Western Digital, model 1 terabyte My Passport external hard drive, SN# WX91A60H6781T, seized from the defendant, LARRY J. RIDLEY, a.k.a. Athf, on November 17, 2010;
- 17. Tan computer tower seized from defendant, DAVID B. LINDSAY, a.k.a. Slipnslide, on November 19, 2010, from Eastgate cleaners, 145 N. Main Street, Kaysville, UT;
- 18. Black computer seized from defendant, DAVID B. LINDSAY, a.k.a. Slipnslide, on November 19, 2010, from the residence located at 939 Ridge Hill Lane, Apt 20, Midvale, UT.
- 19. Sony PSP seized from defendant, DAVID B. LINDSAY, a.k.a. Slipnslide, on November 19, 2010, from the residence located at 939 Ridge Hill Lane, Apt 20, Midvale, UT.
- 20. Digital media disks seized from defendant, DAVID B. LINDSAY, a.k.a. Slipnslide, on November 19, 2010, from the residence located at 939 Ridge Hill Lane, Apt 20, Midvale, UT.
- 21.2 digital cameras seized from defendant, DAVID B. LINDSAY, a.k.a. Slipnslide, on November 19, 2010, from the residence located at 939 Ridge Hill Lane, Apt 20, Midvale, UT.
- 22. Gateway computer, SN#06634DB0DS24, seized from the defendant, DANIEL DESCHENES, a.k.a. Catman, on November 16, 2010:
- 23. Maxtor computer, SN# Y22R4J7E, seized from the defendant, DANIEL DESCHENES, a.k.a. Catman, on November 16, 2010;

- 24. Ultra mini-tower computer, SN# 00282657 with included Seagate hard drive, SN# GS861532, seized from the defendant, DANIEL DESCHENES, a.k.a. Catman, on November 16, 2010;
- 25. E-Machine desk top computer SN# CEX5510021689, seized from the defendant, MICHEAL VAN THOMPSON, a.k.a. SamSneed, on January 31, 2011;
- 26. Gateway laptop computer, SN#T4A8131004493, seized from the defendant, MICHEAL VAN THOMPSON, a.k.a. SamSneed, on January 31, 2011;
- 27. Toshiba laptop computer, SN# 26267656, seized from the defendant, MICHEAL VAN THOMPSON, a.k.a. SamSneed, on January 31, 2011;
- 28. HD Laptop computer, SN# CNF0243K09, seized from the defendant, MICHEAL VAN THOMPSON, a.k.a. SamSneed, on January 31, 2011;
- 29. Western Digital hard drive, SN# WCANMF281915, seized from the defendant, MICHEAL VAN THOMPSON, a.k.a. SamSneed, on January 31, 2011;
- 30 Western Digital hard drive, SN# WCA1148058905, seized from the defendant, MICHEAL VAN THOMPSON, a.k.a. SamSneed, on January 31, 2011;
- 31. Western Digital hard drive, SN# WCAPZ0843220, seized from the defendant, MICHEAL VAN THOMPSON, a.k.a. SamSneed, on January 31, 2011;
- 32. Maxtor hard drive, SN# 2CAS65D8 seized from the defendant, MICHEAL VAN THOMPSON, a.k.a. SamSneed, on January 31, 2011;
- 33. Sprint air card ESN# 58489681, seized from the defendant, MICHEAL VAN THOMPSON, a.k.a. SamSneed, on January 31, 2011;

- 34. Sprint air card HEX 60A50A22, seized from the defendant, MICHEAL VAN THOMPSON, a.k.a. SamSneed, on January 31, 2011;
- 35.51 DVD's seized from the defendant, MICHEAL VAN THOMPSON, a.k.a. SamSneed, on January 31, 2011;

If the above-described property subject to forfeiture, as a result of any act or omission of the defendants:

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

it is the intent of the United States, pursuant to Title 21 United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

A TRUE BILL:

FOREPERSON: FEDERAL GRAND JURY

STEPHANIE A FINLEY United States Attorney

JOHN LUKE WALKER Bar # 18077

Assistant United States Attorney

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