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UNITED STATES DISTRICT COURT

NOV 1 0 2010

WESTERN DISTRICT OF LOUISIANA

TONY R. MOORE, CLERK

a.k.a. kimkim

SHREVEPORT DIVISION

BY DEPUTY	SHREVEPOR	I L	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)
JOHN DOE #1 a.k.a. Hawkeye	(1)	*	JUDGE HICKS
EDWARD OEDEWALDT a.k.a. twelvish a.k.a. Legend	(2)	* * *	JODGE HOMMODI
JOHN DOE #2 a.k.a. BossHiaka	(3)	*	
JOHN DOE #3 a.k.a. Ibro	(4)	*	
JOHN DOE #4 a.k.a. Pervfessor	(5)	*	
JOHN DOE #5 a.k.a. Dasha4Ever	(6)	*	
JOHN DOE #6 a.k.a. Hasness2009	(7)	*	
JOHN DOE #7 a.k.a. Beast	(8)	*	
JOHN DOE #8 a.k.a. Mabuhay	(9)	*	
DOUWE MARCEL VAN Da.k.a. Cixx	DE LAAR (10)	*	•
JOHN DOE #9 a.k.a. Catfish	(11)	*	
JOHN DOE #10	(12)	*	ATTEST A TRUE COPY TONYR, MOORE, GLEA USDC, WESTERN DISTRICT

JOHN DOE #11 a.k.a. Demian	(13)	* *
JOHN DOE #12 a.k.a. Johhny_5_is_@live	(14)	* *
JOHN DOE #13 a.k.a. Erewe	(15)	* *
JOHN WYSS a.k.a. Bones	(16)	* * *
JOHN DOE #15 a.k.a. Jailbird	(17)	* * *
JOHN DOE #16 a.k.a. Athf	(18)	* * *
JOHN DOE #17 a.k.a. sonnyshade	(19)	* * *
JOHN DOE #18 a.k.a. Slipnslide	(20)	* * *
JOHN DOE #19 a.k.a. Catman	(21)	* * *
JOHN DOE #20 a.k.a. Todluvr	(22)	* * *
JOHN DOE #21 a.k.a. tommyleejones	(23)	* * *
JOHN DOE #22 a.k.a. Blaine	(24)	* * *
JOHN DOE #23 a.k.a. SamSneed	(25)	* * *
JOHN DOE #24 a.k.a. NLN	(26)	* * *
JOHN DOE #25 a.k.a. Lofty	(27)	* *
JOHN DOE #26 a.k.a. Michy99	(28)	*

### 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, JOHN DOE #2 a.k.a BossHiaka, JOHN DOE #3 a.k.a. Ibro, JOHN DOE #4 a.k.a. Pervfessor, JOHN DOE #5 a.k.a. Dasha4Ever, JOHN DOE #6 a.k.a. Hasness2009, JOHN DOE #7 a.k.a. Beast, JOHN DOE #8 a.k.a. Mabuhay, DOUWE MARCEL VAN DE LAAR a.k.a. Cixx, JOHN DOE #9 a.k.a. Catfish, JOHN DOE #10 a.k.a. kimkim, JOHN DOE #11 a.k.a. Demian, JOHN DOE #12 a.k.a. Johhny\_5\_is\_@live, JOHN DOE #13 a.k.a. Erewe, JOHN WYSS a.k.a. Bones, JOHN DOE #15 a.k.a. Jailbird, JOHN DOE #16 a.k.a. Athf, JOHN DOE #17 a.k.a. sonnyshade, JOHN DOE #18 a.k.a. Slipnslide, JOHN DOE #19 a.k.a. Catman, JOHN DOE #20 a.k.a. Todluvr, JOHN DOE #21 a.k.a. tommyleejones, JOHN DOE #22 a.k.a. Blaine, JOHN DOE #23 a.k.a. SamSneed, JOHN DOE #24 a.k.a. NLN, JOHN DOE #25 a.k.a. Lofty and JOHN DOE #26 a.k.a. Michy99, 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, JOHN DOE #9 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:

- On or about the 7<sup>th</sup> 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.
- On or about the 7<sup>th</sup> 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 17<sup>th</sup> 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 7<sup>th</sup> 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.

- On or about the 9<sup>th</sup> 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 10<sup>th</sup> 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 28<sup>th</sup> day of May, 2009, JOHN DOE #2 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 19<sup>th</sup> day of April, 2010, JOHN DOE #2 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 9<sup>th</sup> day of June, 2010, JOHN DOE #2 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 4<sup>th</sup> day of April, 2009, JOHN DOE #3 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 12<sup>th</sup> day of January, 2010, JOHN DOE #3 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 20<sup>st</sup> day of January, 2010, JOHN DOE #3 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 13<sup>th</sup> day of April, 2009, JOHN DOE #4 a.k.a. Pervfessor 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 18<sup>th</sup> day of May, 2009, JOHN DOE #4 a.k.a. Pervfessor, 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 12<sup>th</sup> day of June, 2010, JOHN DOE #4 a.k.a. Pervfessor did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Lesinka Collection*, which contained child pornography.
- 16. On or about the 27<sup>th</sup> 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 28<sup>th</sup> 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 1<sup>st</sup> 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 24<sup>th</sup> 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 9<sup>th</sup> 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 26<sup>th</sup> 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 27<sup>th</sup> day of June, 2009, JOHN DOE #7 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 24<sup>th</sup> day of February, 2010, JOHN DOE #7 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 7<sup>th</sup> day of November, 2010, JOHN DOE #7 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 1<sup>st</sup> day of October, 2009, JOHN DOE #8 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 6<sup>th</sup> day of October, 2009, JOHN DOE #8 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 6<sup>th</sup> day of June, 2010, JOHN DOE #8 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 4<sup>th</sup> 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 7<sup>th</sup> 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 2<sup>nd</sup> 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 25<sup>th</sup> day of June, 2009, JOHN DOE #9 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 30<sup>th</sup> day of July, 2009, JOHN DOE #9 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 31<sup>th</sup> day of December, 2009, JOHN DOE #9 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.

- On or about the 14<sup>th</sup> 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 25<sup>th</sup> 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 18<sup>th</sup> 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 22<sup>nd</sup> 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 21<sup>st</sup> 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 30<sup>th</sup> 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 16<sup>th</sup> day of June, 2010, JOHN DOE #12 a.k.a. Johhny\_5\_is\_@live did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *11yo Maria*, *HOT!!!.avi*, which contained child pornography.
- 41. On or about the 21<sup>st</sup> day of June, 2010, JOHN DOE #12 a.k.a. Johhny\_5\_is\_@live did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 50 (47).avi, which contained child pornography.
- On or about the 22<sup>nd</sup> day of June, 2010, JOHN DOE #12 a.k.a. Johhny\_5\_is\_@live did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 391.mpg, which contained child pornography.
- 43. On or about the 17<sup>th</sup> 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.
- 44. On or about the 10<sup>th</sup> 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 2<sup>nd</sup>*, 2008 (not compressed)5.avi, which contained child pornography.
- 45. On or about the 9<sup>th</sup> 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.

- 46. On or about the 15<sup>th</sup> 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.
- 47. On or about the 18<sup>th</sup> 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.
- 48. On or about the 28<sup>th</sup> 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 *Iollipop4A.avi*, which contained child pornography.
- 49. On or about the 7<sup>th</sup> day of July, 2009, JOHN DOE #15 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.
- 50. On or about the 3<sup>rd</sup> day of October, 2009, JOHN DOE #15 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.
- 51. On or about the 4<sup>th</sup> day of April, 2010, JOHN DOE #15 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.
- 52. On or about the 26<sup>th</sup> day of March, 2010, JOHN DOE #16 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.
- 53. On or about the 28<sup>th</sup> day of March, 2010, JOHN DOE #16 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.
- 54. On or about the 19<sup>th</sup> day of May, 2010, JOHN DOE #16 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.
- 55. On or about the 10<sup>th</sup> 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 10<sup>th</sup> 2008 (uncensored)(RPEX3).avi, which contained child pornography.
- 56. On or about the 6<sup>th</sup> 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.
- 57. On or about the 13<sup>th</sup> 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.
- 58. On or about the 8<sup>th</sup> day of July, 2009, JOHN DOE #18 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.
- 59. On or about the 4<sup>th</sup> day of October, 2009, JOHN DOE #18 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.
- 60. On or about the 15<sup>th</sup> day of May, 2010, JOHN DOE #18 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.
- On or about the 27<sup>th</sup> day of July, 2009, JOHN DOE #19 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.
- 62. On or about the 22<sup>nd</sup> day of September, 2009, JOHN DOE #19 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.
- On or about the 7<sup>th</sup> day of June, 2010, JOHN DOE #19 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.
- 64. On or about the 5<sup>th</sup> 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.
- On or about the 2<sup>nd</sup> 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.
- 66. On or about the 3<sup>rd</sup> 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.
- 67. On or about the 12<sup>th</sup> day of April, 2009, JOHN DOE #21 a.k.a. tommyleejones did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 101 cumshots revised by harrier.wmv, which contained child pornography.
- 68. On or about the 2<sup>nd</sup> day of May, 2010, JOHN DOE #21 a.k.a. tommyleejones did knowingly publish on the Dreamboard Internet Bulletin

- Board an advertisement offering to distribute the file entitled 6yo girl Drugged and ass raped.mpg, which contained child pornography.
- 69. On or about the 4<sup>th</sup> day of June, 2010, JOHN DOE #21 a.k.a. tommyleejones did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled *Red07.avi*, which contained child pornography.
- 70. On or about the 12<sup>th</sup> 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.
- 71. On or about the 13<sup>th</sup> 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.
- 72. On or about the 17<sup>th</sup> 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.
- 73. On or about the 17<sup>th</sup> day of August, 2009, JOHN DOE #23 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.
- 74. On or about the 10<sup>th</sup> day of January, 2010, JOHN DOE #23 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.
- 75. On or about the 7<sup>th</sup> day of June, 2010, JOHN DOE #23 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.
- 76. On or about the 26<sup>th</sup> day of May, 2010, JOHN DOE #24 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.
- 77. On or about the 1<sup>st</sup> day of June, 2010, JOHN DOE #24 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.
- 78. On or about the 18<sup>th</sup> day of June, 2010, JOHN DOE #24 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.
- 79. On or about the 17<sup>th</sup> day of May, 2010, JOHN DOE #25 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.
- 80. On or about the 5<sup>th</sup> day of June, 2010, JOHN DOE #25 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.
- 81. On or about the 20<sup>th</sup> day of June, 2010, JOHN DOE #25 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.
- 82. On or about the 22<sup>nd</sup> day of July, 2009, JOHN DOE #26 a.k.a. Michy99 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled blond girls, which contained child pornography.
- 83. On or about the 28<sup>th</sup> day of July, 2009, JOHN DOE #26 a.k.a. Michy99 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled nice girl 10-12, which contained child pornography.
- 84. On or about the 21<sup>st</sup> day of August, 2009, JOHN DOE #26 a.k.a. Michy99 did knowingly publish on the Dreamboard Internet Bulletin Board an advertisement offering to distribute the file entitled 33.mpg, 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, JOHN DOE #2 a.k.a BossHiaka, JOHN DOE #3 a.k.a. Ibro, JOHN DOE #4 a.k.a. Pervfessor, JOHN DOE #5 a.k.a. Dasha4Ever, JOHN DOE #6 a.k.a. Hasness2009, JOHN DOE #7 a.k.a. Beast, JOHN DOE #8 a.k.a. Mabuhay, DOUWE MARCEL VAN DE LAAR a.k.a. Cixx, JOHN DOE #9 a.k.a. Catfish, JOHN DOE #10 a.k.a. kimkim, JOHN DOE #11 a.k.a. Demian, JOHN DOE #12 a.k.a. Johnny\_5\_is\_@live, JOHN DOE #13 a.k.a. Erewe, JOHN WYSS a.k.a. Bones, JOHN DOE #15 a.k.a. Jailbird, JOHN DOE #16 a.k.a. Athf, JOHN DOE #17 a.k.a. sonnyshade, JOHN DOE #18 a.k.a. Slipnslide, JOHN DOE #19 a.k.a. Catman, JOHN DOE #20 a.k.a. Todluvr, JOHN DOE #21 a.k.a. tommyleejones, JOHN DOE #22 a.k.a. Blaine, JOHN DOE #23 a.k.a. SamSneed, JOHN DOE #24 a.k.a. NLN, JOHN DOE #25 a.k.a. Lofty and JOHN DOE #26 a.k.a. Michy99, 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, JOHN DOE #2 a.k.a BossHiaka, JOHN DOE #3 a.k.a. Ibro, JOHN DOE #4 a.k.a. Pervfessor, JOHN DOE #5 a.k.a. Dasha4Ever, JOHN DOE #6 a.k.a. Hasness2009, JOHN DOE #7 a.k.a. Beast, JOHN DOE #8 a.k.a. Mabuhay, DOUWE MARCEL VAN DE LAAR a.k.a. Cixx, JOHN DOE #9 a.k.a. Catfish, JOHN DOE #10 a.k.a. kimkim, JOHN DOE #11 a.k.a. Demian, JOHN DOE #12 a.k.a. Johhny 5 is @live, JOHN DOE #13 a.k.a. Erewe, JOHN WYSS a.k.a. Bones, JOHN DOE #15 a.k.a. Jailbird, JOHN DOE #16 a.k.a. Athf, JOHN DOE #17 a.k.a. sonnyshade, JOHN DOE #18 a.k.a. Slipnslide, JOHN DOE #19 a.k.a. Catman, JOHN DOE #20 a.k.a. Todluvr, JOHN DOE #21 a.k.a. tommyleejones, JOHN DOE #22 a.k.a. Blaine, JOHN DOE #23 a.k.a. SamSneed, JOHN DOE #24 a.k.a. NLN, JOHN DOE #25 a.k.a. Loftv and JOHN DOE #26 a.k.a. Michy99, 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).

A TRUE BILL:

FOREPERSON: FEDERAL GRAND JURY

STEPHANIE A FINLEY United States Attorney

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