

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

DOUGLAS LEE PATRICK,

Defendant

* **CRIMINAL NO. _____**
*
* **(Production of Child Pornography, 18**
* **U.S.C. § 2251; Possession of Child**
* **Pornography, 18 U.S.C. § 2252(a)(4)(B);**
* **Forfeiture, 18 U.S.C. § 2253)**
*
*

INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

At all times relevant to this Indictment:

A. INTRODUCTION

1. **DOUGLAS LEE PATRICK** resided at 1412 Hopewell Avenue, Essex, Maryland.

2. MyYearbook.com is a social networking site available on the Internet. The site is built around social networking games that are all tied together by single virtual currency called “lunch money.”

3. **DOUGLAS LEE PATRICK** utilized the following e-mail accounts to create profiles on MyYearbook.com: hotass_leah@yahoo.com; sexyassleah18@yahoo.com; sweetlisa1818@yahoo.com; ice_man641@yahoo.com.

B. OFFENSE CONDUCT

4. **DOUGLAS LEE PATRICK** portrayed himself on MyYearbook.com as an 18-year old female.

5. **DOUGLAS LEE PATRICK** told numerous minor females, including minor females identified herein as Jane Doe #1, Jane Doe #2, and Jane Doe #3, that he was an 18 year old female named “Leah,” and that “Leah” was a lesbian.

6. **DOUGLAS LEE PATRICK** is a male born on 3/14/71, approximately 5'9" tall and weighs 374 pounds.

7. **DOUGLAS LEE PATRICK** advised the minor females that he, in the role of “Leah,” had cancer.

8. **DOUGLAS LEE PATRICK** communicated with the minor females through the Internet, phone and mail.

9. Many of the minor females corresponding with **DOUGLAS LEE PATRICK**, in the role of “Leah,” believed they were in a romantic relationship with “Leah.”

10. **DOUGLAS LEE PATRICK** asked numerous minor females to send him pictures depicting their genital area over the Internet.

C. THE CHARGE

11. On or about December 30, 2008, in the District of Maryland, and elsewhere, the defendant,

DOUGLAS LEE PATRICK,

did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, which visual depiction

had been produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depiction had actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, including, but not limited to, an image depicting Jane Doe #1's genital area.

18 U.S.C. § 2251(a)

COUNT TWO

And the Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Ten of Count One of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

2. On or about February 17, 2009, in the District of Maryland and elsewhere, the defendant,

DOUGLAS LEE PATRICK,

did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2) for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, which visual depiction had been produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depiction had actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, including, but not limited to, an image depicting Jane Doe #2's genital area.

18 U.S.C. § 2251(a)

COUNT THREE

And the Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Ten of Count One of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

2. On or about February 23, 2009, in the District of Maryland and elsewhere, the defendant,

DOUGLAS LEE PATRICK,

did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2) for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, which visual depiction had been produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depiction had actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, including, but not limited to, an image depicting Jane Doe #2's genital area.

18 U.S.C. § 2251(a)

COUNT FOUR

And the Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Ten of Count One of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

2. On or about February 14, 2009, in the District of Maryland and elsewhere, the defendant,

DOUGLAS LEE PATRICK,

did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2) for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, which visual depiction had been produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depiction had actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, including, but not limited to, an image depicting Jane Doe #3's genital area.

18 U.S.C. § 2251(a)

COUNT FIVE

And the Grand Jury for the District of Maryland further charges that:

1. Paragraphs One through Ten of Count One of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

2. On or about March 4, 2009, in the District of Maryland, the defendant,

DOUGLAS LEE PATRICK,

did knowingly possess and knowingly access with intent to view one or more matters which contained any visual depiction that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which was produced using materials which had been mailed, shipped and transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, and such visual depiction being of such conduct, that is, the defendant did possess a Toshiba laptop, serial number YB701514Q, that contained visual depictions of minors engaged in sexually explicit conduct.

18 U.S.C. § 2252(a)(4)(B)

FORFEITURE

1. The allegations contained in Count One through Five of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253.

2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Sections 2251 and 2252, the defendant, **DOUGLAS LEE PATRICK**, shall forfeit to the United States of America:

- a. Any visual depiction described in Title 18, United States Code, sections 2251, 2251A, or 2252, 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 Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

The property to be forfeited includes, but is not limited to, the following: a Toshiba laptop, serial number YB701514Q.

3. If any of the property described above, 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 party;
- 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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).

18 U.S.C. § 2253; F.R.Crim.P. 32.2(a)

ROD J. ROSENSTEIN
UNITED STATES ATTORNEY

A TRUE BILL:

Foreperson

Date