

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. _____
v.)	
)	Violations: Title 18, United
ADRIAN C. PETERS, a/k/a)	States Code, Sections 2251(a)
ADRIAN WERSHIN, ADRIAN)	and 2252A(a)(5)(B)
PETERS-WERSHIN, ACE PETERS)	
ACE 175, and KRIXADE)	

COUNT ONE

The JULY 2014 GRAND JURY charges:

On or about October 12, 2012, at South Beloit, in the Northern District of Illinois, Western Division, and elsewhere,

ADRIAN C. PETERS,

defendant herein, did knowingly use, persuade, induce, entice, and coerce a minor, namely, Victim A, to engage in sexually explicit conduct, namely, masturbation and the lascivious exhibition of the minor's genitals or pubic area, for the purpose of transmitting a live visual depiction, knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and produced using materials that had been mailed, shipped, and transported in and affecting

interstate and foreign commerce by any means, including by computer, and attempted to do so;

In violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

The JULY 2014 GRAND JURY further charges:

On or about October 13, 2012, at South Beloit, in the Northern District of Illinois, Western Division, and elsewhere,

ADRIAN C. PETERS,

defendant herein, did knowingly use, persuade, induce, entice, and coerce a minor, namely, Victim A, to engage in sexually explicit conduct, namely, masturbation and the lascivious exhibition of the minor's genitals or pubic area, for the purpose of transmitting a live visual depiction, knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2251(a).

COUNT THREE

The JULY 2014 GRAND JURY further charges:

On or about October 22, 2013, at South Beloit, in the Northern District of Illinois, Western Division, and elsewhere,

ADRIAN C. PETERS,

defendant herein, did knowingly use, persuade, induce, entice, and coerce a minor, namely, Victim B, to engage in sexually explicit conduct, namely, the masturbation and lascivious exhibition of the minor's genitals or pubic area, for the purpose of transmitting a live visual depiction, knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2251(a).

COUNT FOUR

The JULY 2014 GRAND JURY further charges:

On or about October 23, 2013, at South Beloit, in the Northern District of Illinois, Western Division, and elsewhere,

ADRIAN C. PETERS,

defendant herein, did knowingly use, persuade, induce, entice, and coerce a minor, namely, Victim B, to engage in sexually explicit conduct, namely, masturbation and lascivious exhibition of the minor's genitals or pubic area, for the purpose of transmitting a live visual depiction, knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2251(a).

COUNT FIVE

The JULY 2014 GRAND JURY further charges:

On or about December 11, 2013, at South Beloit, in the Northern District of Illinois, Western Division, and elsewhere,

ADRIAN C. PETERS,

defendant herein, did knowingly use, persuade, induce, entice, and coerce a minor, namely, Victim C, to engage in sexually explicit conduct, namely, masturbation and the lascivious exhibition of the minor's genitals or pubic area, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that the visual depiction would be produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2251(a).

COUNT SIX

The JULY 2014 GRAND JURY further charges:

On or about December 17, 2013, at South Beloit, in the Northern District of Illinois, Western Division, and elsewhere,

ADRIAN C. PETERS,

defendant herein, did knowingly use, persuade, induce, entice, and coerce a minor, namely, Victim C, to engage in sexually explicit conduct, namely, sexual intercourse and the lascivious exhibition of the minor's genitals or pubic area, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that the visual depiction would be produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2251(a).

COUNT SEVEN

The JULY 2014 GRAND JURY further charges:

On or about December 25, 2013, at South Beloit, in the Northern District of Illinois, Western Division, and elsewhere,

ADRIAN C. PETERS,

defendant herein, did knowingly use, persuade, induce, entice, and coerce a minor, namely, Victim D, to engage in sexually explicit conduct, namely, masturbation and lascivious exhibition of the minor's genitals or pubic area, for the purpose of transmitting a live visual depiction, knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2251(a).

COUNT EIGHT

The JULY 2014 GRAND JURY further charges:

On or about December 26, 2013, at South Beloit, in the Northern District of Illinois, Western Division, and elsewhere,

ADRIAN C. PETERS,

defendant herein, did knowingly use, persuade, induce, entice, and coerce a minor, namely, Victim D, to engage in sexually explicit conduct, namely, lascivious exhibition of the minor's genitals or pubic area, for the purpose of transmitting a live visual depiction, knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2251(a).

COUNT NINE

The JULY 2014 GRAND JURY further charges:

On or about December 27, 2013, at South Beloit, in the Northern District of Illinois, Western Division, and elsewhere,

ADRIAN C. PETERS,

defendant herein, did knowingly use, persuade, induce, entice, and coerce a minor, namely, Victim D, to engage in sexually explicit conduct, namely, the lascivious exhibition of the minor's genitals or pubic area, for the purpose of transmitting a live visual depiction, knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2251(a).

COUNT TEN

The JULY 2014 GRAND JURY further charges:

On or about April 25, 2014, at South Beloit, in the Northern District of Illinois, Western Division, and elsewhere,

ADRIAN C. PETERS,

defendant herein, did knowingly use, persuade, induce, entice, and coerce a minor, namely, Victim E, to engage in sexually explicit conduct, namely, masturbation and lascivious exhibition of the minor's genitals or pubic area, for the purpose of transmitting a live visual depiction, knowing and having reason to know that the visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2251(a).

COUNT ELEVEN

The JULY 2014 GRAND JURY further charges:

On or about October 4, 2014, at South Beloit, in the Northern District of Illinois, Western Division, and elsewhere,

ADRIAN C. PETERS,

defendant herein, did knowingly use, persuade, induce, entice, and coerce a minor, namely, Victim F, to engage in sexually explicit conduct, namely, sexual intercourse and lascivious exhibition of the minor's genitals or pubic area, for the purpose of a visual depiction of such conduct, knowing and having reason to know that the visual depiction would be produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2251(a).

COUNT TWELVE

The JULY 2014 GRAND JURY further charges:

On or about December 11, 2014, at South Beloit, in the Northern District of Illinois, Western Division, and elsewhere,

ADRIAN C. PETERS,

defendant herein, did knowingly use, persuade, induce, entice, and coerce a minor, namely, Victim G, to engage in sexually explicit conduct, namely, sexual intercourse and lascivious exhibition of the minor's genitals or pubic area, for the purpose of a visual depiction of such conduct, knowing and having reason to know that the visual depiction would be produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2251(a).

FORFEITURE ALLEGATION

The JULY 2014 GRAND JURY further alleges:

1. The allegations in Counts One through Twelve of this Indictment are realleged here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

2. As a result of his violations of Title 18, United States Code, Sections 2251 as alleged in the foregoing Indictment,

ADRIAN C. PETERS,

defendant herein, shall forfeit to the United States any and all right, title and interest defendant has in any matter that contains visual depictions described in Title 18, United States Code, Section 2251; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the said violation, including, but not limited to,

- a. Hitachi hard drive with serial number F32SG0WD; and
- b. Lenovo IdeaPad U530 Touch laptop computer, model 20289, with serial number QB07697478.;

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY