

COPY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA :

- v. - :

INDICTMENT  
14 Cr.

STEPHEN P. BROWN, :

Defendant. :

- - - - -X

COUNT ONE

(Sexual Exploitation of a Child)

The Grand Jury charges:

1. In or about August 2012, in the Southern District of New York, STEPHEN P. BROWN, the defendant, knowingly employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce and mailed, and such visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, STEPHEN P. BROWN,

the defendant, engaged in sexually explicit conduct in Sullivan County, New York, with a boy under the age of eleven for the purpose of producing sexually explicit photographs of such activity.

(Title 18, United States Code, Section 2251(a) and (e).)

COUNT TWO

(Attempted Sexual Exploitation of a Child)

The Grand Jury further charges:

2. Between on or about January 14, 2014 up to and including on or about March 4, 2014, in the Southern District of New York, STEPHEN P. BROWN, the defendant, knowingly attempted to employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the defendant knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce and mailed, and such visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, STEPHEN P. BROWN, the defendant, attempted to persuade, induce and entice an undercover

officer posing as an 11-year-old boy to engage in sexually explicit conduct for the purpose of producing photographs of such conduct.

(Title 18, United States Code, Section 2251(a) and (e).)

COUNT THREE

(Attempted Enticement)

The Grand Jury further charges:

3. Between on or about January 14, 2014 up to and including on or about March 4, 2014, in the Southern District of New York and elsewhere, STEPHEN P. BROWN, the defendant, using facilities and means of interstate and foreign commerce, knowingly attempted to persuade, induce, and entice an individual who had not attained the age of 18 years to engage in a sexual activity for which a person can be charged, to wit, STEPHEN P. BROWN, the defendant, attempted to persuade, induce, and entice an undercover officer posing as an 11-year-old boy to meet the defendant in Westchester, New York for the purpose of engaging in sexual activities.

(Title 18, United States Code, Section 2422(b).)

COUNT FOUR

(Receipt and Distribution of Child Pornography)

The Grand Jury further charges:

4. From at least in or about January 13, 2012 up to and including March 4, 2014, in the Southern District of New York and elsewhere, STEPHEN P. BROWN, the defendant, knowingly did receive and distribute material that contained child pornography that had been mailed, and using a means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, STEPHEN P. BROWN downloaded, in New York, New York, computer files containing images and videos of child pornography and, on various occasions in February 2014, transmitted, by computer, certain of these files containing child pornography to an undercover officer posing as an 11-year-old boy.

(Title 18, United States Code, Section 2252A(a)(2)(B) and (b)(1).

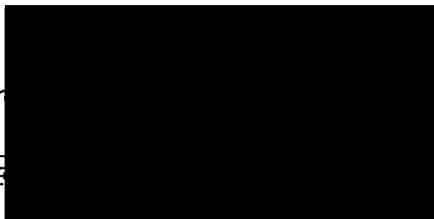
COUNT FIVE

(Possession of Child Pornography)

The Grand Jury further charges:

5. From at least in or about January 13, 2012 up to and including March 4, 2014, in the Southern District of New York, STEPHEN P. BROWN, the defendant, knowingly did possess and access with intent to view, a book, magazine, periodical, film, videotape, computer

disk, and other material that contained an image of child pornography that had been mailed, and shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, STEPHEN P. BROWN, the defendant, possessed, in New York, New York, an external Cavalry storage device containing thousands of images of child pornography, including numerous images of children under age 12. (Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).)



Preet Bharara  
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