

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 16-
v.	:	DATE FILED: March 17, 2016
MICHAEL LEES,	:	VIOLATIONS:
a/k/a "Michael Lewis,"	:	18 U.S.C. § 2242(b) and (e) (enticement of
a/k/a "Michael Dontask"	:	a minor - 1 count)
	:	18 U.S.C. § 2251 (production of child
	:	pornography - 1 count)
	:	18 U.S.C. § 2251 (attempted production
	:	of child pornography – 2 counts)
	:	18 U.S.C. § 2252(a)(4) (possession of child
	:	pornography - 1 count)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

In or about October 2015 to on or about December 10, 2015, in Lehigh County, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MICHAEL LEES,
a/k/a "Michael Lewis,"
a/k/a "Michael Dontask,"**

knowingly used a facility and means of interstate commerce, that is, the Internet and a mobile device, to attempt to knowingly persuade, induce, and entice Minor #1, whom he believed was 12-years-old, to engage in sexual activity for which a person can be criminally charged under Commonwealth of Pennsylvania law, to wit: 18 Pa.C.S.A § 3125(a)(7) (Aggravated Indecent Assault) and 18 Pa.C.S.A. § 2136(a)(7) (Indecent Assault).

In violation of Title 18, United States Code, Section 2422(b) and (e).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 15, 2015, in Lehigh County, in the Eastern District of Pennsylvania, defendant

**MICHAEL LEES,
a/k/a “Michael Lewis,”
a/k/a “Michael Dontask,”**

employed, used, persuaded, induced, enticed, and coerced, Minor #1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct and knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 5, 2015, in Lehigh County, in the Eastern District of Pennsylvania, defendant

**MICHAEL LEES,
a/k/a “Michael Lewis,”
a/k/a “Michael Dontask,”**

attempted to employ, use, persuade, induce, entice, and coerce, Minor #2, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct and the visual depiction was produced using materials that had been shipped and transported in interstate and foreign commerce.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 15, 2015, in Lehigh County, in the Eastern District of Pennsylvania, defendant

**MICHAEL LEES,
a/k/a “Michael Lewis,”
a/k/a “Michael Dontask,”**

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 that conduct and knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 10, 2015, in Lehigh County, in the Eastern District of Pennsylvania, defendant

**MICHAEL LEES,
a/k/a “Michael Lewis,”
a/k/a “Michael Dontask,”**

knowingly possessed a mobile device which contained visual depictions that had been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce. The production of these visual depictions involved the use of minors, including prepubescent minors, and minors who had not attained 12 years of age, engaging in sexually explicit conduct and the visual depictions were of minors engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 2251 and 2252, set forth in this indictment, defendant

**MICHAEL LEES,
a/k/a “Michael Lewis,”
a/k/a “Michael Dontask,”**

shall forfeit to the United States of America any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, including, but not limited to:

- (a) a Samsung Galaxy mobile device; and
- (b) a LG mobile device.

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

2. As a result of the violations of Title 18, United States Code, Section 2422, set forth in this indictment, defendant

MICHAEL LEES

shall forfeit to the United States, property, real or personal, used or intended to be used to commit or to facilitate the commission of such offense or any property traceable to such property, and any property, real or personal, constituting or derived from any proceeds obtained directly or indirectly as a result of such offense, including, but not limited to:

- (a) a Samsung Galaxy mobile device; and
- (b) a LG mobile device.

All pursuant to Title 18 U.S.C. Section 2428.

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney