

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

FILED IN OPEN COURT  
2.25.2021

CLERK U S DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 3:21-cr-19-MMH-PDB

18 U.S.C. § 1594(c)

18 U.S.C. § 1591

18 U.S.C. § 2252(a)(4)(B)

SAMUEL CHRISTOPHER TEMPLEMAN

DEBORAH LYNN TEMPLEMAN

INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning at least by an unknown date in or around November 2019,  
and continuing through on or about December 11, 2019, in the Middle  
District of Florida, and elsewhere, the defendants,

SAMUEL CHRISTOPHER TEMPLEMAN  
and  
DEBORAH LYNN TEMPLEMAN,

did knowingly combine, conspire, confederate, and agree with each other and  
with others who are known and unknown to the grand jury to knowingly  
recruit, entice, harbor, transport, provide, obtain, maintain, patronize and  
solicit, by any means, a girl referred to as Minor Victim 1, and benefit  
financially, and receive anything of value from participation in a venture  
which recruited, enticed, harbored, transported, provided, obtained,

maintained, patronized, and solicited, by any means, Minor Victim 1, in and affecting interstate and foreign commerce, knowing and in reckless disregard of the fact that Minor Victim 1 was under the age of 18 years and would be caused to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a) and (b)(2).

It was part of the conspiracy that the defendants would perform acts and make statements to hide and conceal and cause to be hidden and concealed the purpose of the conspiracy and the acts committed in furtherance thereof.

All in violation of 18 U.S.C. § 1594(c).

COUNT TWO

Beginning at least by an unknown date in or around November 2019, and continuing through on or about December 11, 2019, in the Middle District of Florida, and elsewhere, the defendant,

SAMUEL CHRISTOPHER TEMPLEMAN,

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, maintain, and solicit a girl referred to as Minor Victim 1, and benefit financially, and receive anything of value from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, maintained, and solicited, by an means,

Minor Victim 1, and aid and abet the same, while knowing and in reckless disregard of the fact that Minor Victim 1 had not attained the age of 18 years, and having had the reasonable opportunity to observe Minor Victim 1, and knowing that Minor Victim 1 would be caused to engage in a commercial sex act.

All in violation of 18 U.S.C. § 1591(a) and (b)(2) and 18 U.S.C. § 2.

COUNT THREE

On or about December 7, 2019, in the Middle District of Florida, and elsewhere, the defendant,

DEBORAH LYNN TEMPLEMAN,

did knowingly possess a matter, that is, a Samsung Model SM-A102U cellular telephone, which contained a visual depiction, that is, the visual depiction in the computer file titled 20191024\_231812.mp4, that had been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce, when the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct.

In violation of 18 U.S.C. § 2252(a)(4)(B) and (b)(2).

**FORFEITURE**

1. The allegations contained in Counts One through Three are incorporated by reference for the purpose of alleging forfeiture, pursuant to the provisions of 18 U.S.C. §§ 1594 and 2253.

2. Upon conviction of a conspiracy of the violation of 18 U.S.C. § 1591(a), in violation of 18 U.S.C. § 1594(c), the defendants, SAMUEL CHRISTOPHER TEMPLEMAN and DEBORAH LYNN TEMPLEMAN, shall forfeit to the United States, pursuant to 18 U.S.C. § 1594,

- a. any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the violation(s); and
- b. any property, real or personal, which constitutes or is derived from proceeds traceable to the violation(s).

3. Upon conviction of a violation of 18 U.S.C. § 1591(a), the defendant, SAMUEL CHRISTOPHER TEMPLEMAN, shall forfeit to the United States, pursuant to 18 U.S.C. § 1594:

- a. any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the violation(s); and
- b. any property, real or personal, which constitutes or is derived from proceeds traceable to the violation(s).

4. Upon conviction of a violation of 18 U.S.C. § 2252(a)(4)(B), the defendant, DEBORAH LYNN TEMPLEMAN, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253:

a. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B, or 2260 of chapter 110 of Title 18, 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 chapter 110;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

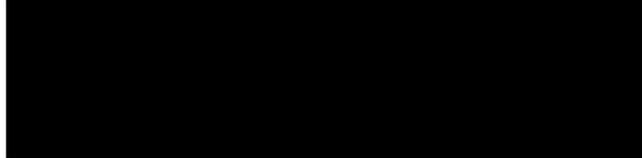
c. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

5. 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 person;
- 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 subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to 18 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), and as incorporated by 18 U.S.C. § 2253(b).

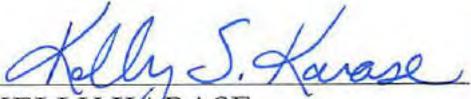
A TRUE BILL,



MARIA CHAPA LOPEZ  
United States Attorney

By:   
LAURA COFER TAYLOR  
Assistant United States Attorney

By:   
ERIN WOLFSON  
Special Assistant United States Attorney

By:   
KELLY KARASE  
Assistant United States Attorney  
Deputy Chief, Jacksonville Division

FORM OBD-34  
2/19/21 Revised

No.

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**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Jacksonville Division

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THE UNITED STATES OF AMERICA

vs.

SAMUEL CHRISTOPHER TEMPLEMAN and DEBORAH LYNN TEMPLEMAN

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**INDICTMENT**

Violations: 18 U.S.C. § 1594(c), 18 U.S.C. § 1591, and 18 U.S.C. § 2252(a)(4)(B)

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Filed in open court this 25<sup>th</sup> day  
of February, 2021.

A large, stylized handwritten signature in blue ink, written over the date and extending across the signature line.

\_\_\_\_\_  
Clerk

Bail \$ \_\_\_\_\_

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