UNITED STATES DISTRICT COURT 3:21-cr- **33-TJC** 18 U.S.C. § 2251(a) MIDDLE DISTRICT OF FLORIDA JACKSONVILLE DIVISION

CASE NO. 3:21-cr- 23-TJC

UNITED STATES OF AMERICA

v.

WAYNE JOSEPH CAVINS

INDICTMENT

The Grand Jury charges:

COUNT ONE

On or about January 8, 2021, in the Middle District of Florida, and elsewhere, the defendant,

WAYNE JOSEPH CAVINS,

did employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce.

In violation of 18 U.S.C. § 2251(a) and (e).

COUNT TWO

On or about January 11, 2021, in the Middle District of Florida, and elsewhere, the defendant,

WAYNE JOSEPH CAVINS,

did employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce.

In violation of 18 U.S.C. § 2251(a) and (e).

COUNT THREE

On or about January 18, 2021, in the Middle District of Florida, and elsewhere, the defendant,

WAYNE JOSEPH CAVINS,

did employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce.

In violation of 18 U.S.C. § 2251(a) and (e).

COUNT FOUR

On or about January 21, 2021, in the Middle District of Florida, and elsewhere, the defendant,

WAYNE JOSEPH CAVINS,

did employ, use, persuade, induce, entice, and coerce a minor to engage in any

sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce.

In violation of 18 U.S.C. § 2251(a) and (e).

FORFEITURE

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

2. Upon conviction of a violation of 18 U.S.C. § 2251(a), the defendant 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.

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 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 21

U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).

A TRUE BILL. Kiegert Johnson valor Foreperson

KARIN HOPPMANN Acting United States Attorney

for By:

ASHLEY WASHINGTON Assistant United States Attorney

By:

Kelly Karose Assistant United States Attorney Deputy Chief, Jacksonville Division

FORM OBD-34 3/8/21 Revised

No.

UNITED STATES DISTRICT COURT Middle District of Florida Jacksonville Division

THE UNITED STATES OF AMERICA

VS.

WAYNE JOSEPH CAVINS

INDICTMENT

Violations: 18 U.S.C. § 2251(a)

A true bill,

gles Riegert-Johnson Foreperson

Filed in open court this <u>||||</u> day

of March, 2021.

Bail \$_____