

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
GAINESVILLE DIVISION**

UNITED STATES OF AMERICA

v.

INDICTMENT

DUSTIN LEE NORMAN
_____ /

1:19cr29-AW

THE GRAND JURY CHARGES:

COUNT ONE

Between on or about September 19, 2018, and on or about October 19, 2018,
in the Northern District of Florida and elsewhere, the defendant,

DUSTIN LEE NORMAN,

did knowingly and intentionally use, persuade, induce, and entice a minor to
engage in sexually explicit conduct for the purpose of producing a visual depiction
of such conduct, and this depiction was transported and transmitted in interstate
commerce and produced using materials that had been shipped and transported in
interstate commerce.

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

COUNT TWO

Between on or about September 19, 2018, and on or about October 19, 2018,
in the Northern District of Florida, the defendant,

DUSTIN LEE NORMAN,

did knowingly receive, and attempt to receive, material containing child
pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that
had been shipped and transported using any means and facility of interstate and
foreign commerce.

In violation of Title 18, United States Code, Sections 2252A(a)(2) and
2252A(b)(1).

COUNT THREE

Between on or about September 19, 2018, and on or about October 19, 2018,
in the Northern District of Florida, the defendant,

DUSTIN LEE NORMAN,

did knowingly possess material containing child pornography, as defined in Title
18, United States Code, Section 2256(8)(A), using any means and facility of
interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and
2252A(b)(2).

COUNT FOUR

Between on or about September 19, 2018, and on or about October 19, 2018,
in the Northern District of Florida, the defendant,

DUSTIN LEE NORMAN,

did knowingly transmit in interstate and foreign commerce, via cellular telephone and the Internet, communications containing threats to injure the reputation of D.J., a minor female in the state of Washington, and the defendant transmitted these communications with the intent to extort from D.J. things of value, that is, images and videos of D.J. in various states of undress, while naked, and while engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 875(d).

CRIMINAL FORFEITURE

The allegations contained in Counts One through Four of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture, pursuant to the provisions of Title 18, United States Code, Section 2253. From his engagement in the violations alleged in Counts One through Four of this Indictment, the defendant,

DUSTIN LEE NORMAN,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all of his interest in:

A. Any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, 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 of Title 18, United States Code;

B. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses alleged in Counts One through Four of this Indictment; and

C. Any property, real or personal, used, or intended to be used, to commit or promote the commission of the offenses alleged in Counts One through Four of this Indictment.

D. The property referenced in subparagraphs A, B, and C above includes, but is not limited to, computer hardware such as monitors, central processing units, keyboards, computer programs, software, computer storage devices, such as disk drive units, disks, tapes, and hard disk drives or units, peripherals, modems and other telephonic and acoustical equipment, printers, contents of memory data contained in and through the hardware and software mentioned above, tools,

equipment, and manuals and documentation for the assembly and use of the hardware and software mentioned above.

If, as the result of any act or omission of the defendant, any of the property described above as being subject to forfeiture:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third person;
- iii. has been placed beyond the jurisdiction of the Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), and by Title 28, United States Code, Section 2461(c), to seek forfeiture of any

other property of the defendant up to the value of any forfeitable property described above.

A TRUE BILL:



8/27/2019

DATE

A handwritten signature in blue ink, appearing to read 'L. Keefe', written over a horizontal line.

LAWRENCE KEEFE
United States Attorney

A handwritten signature in blue ink, appearing to read 'Justin M. Keen', written over a horizontal line.

JUSTIN M. KEEN
Assistant United States Attorney