

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

JASON D. BOUDREAU

Defendant.

Cr. No.

**CR 16**

**11M**

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

INDICTMENT

The Grand Jury charges that:

COUNTS 1-33

(Access with Intent to View Child Pornography)

On or about the dates set forth below, in the District of Rhode Island and elsewhere, the defendant, JASON D. BOUDREAU, did knowingly access with intent to view at least one matter contained on an LG LS990 G3, cellular telephone, serial number 503KPBF0523061, which contained a visual depiction, including visual depictions involving prepubescent minors and minors who had not attained twelve years of age, that had been shipped and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and which was produced using materials which have been mailed and shipped and transported by any means, including by computer, and where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and that such visual depiction was of such conduct, and attempted to do so,

<u>COUNT</u>	<u>DATE (On or about)</u>	<u>NUMBER OF MATTERS</u>
1	August 16, 2015	11
2	August 17, 2015	17
3	August 19, 2015	4

<u>COUNT</u>	<u>DATE (On or about)</u>	<u>NUMBER OF MATTERS</u>
4	August 22, 2015	1
5	August 23, 2015	8
6	August 25, 2015	1
7	August 30, 2015	3
8	September 1, 2015	1
9	September 2, 2015	27
10	September 3, 2015	44
11	September 4, 2015	13
12	September 5, 2015	36
13	September 6, 2015	78
14	September 9, 2015	47
15	September 10, 2015	42
16	September 13, 2015	43
17	September 16, 2015	15
18	September 19, 2015	1
19	September 20, 2015	76
20	September 23, 2015	19
21	September 24, 2015	4
22	September 25, 2015	44
23	September 29, 2015	56
24	September 30, 2015	11
25	October 1, 2015	36
26	October 2, 2015	23
27	October 4, 2015	31
28	October 9, 2015	8

<u>COUNT</u>	<u>DATE (On or about)</u>	<u>NUMBER OF MATTERS</u>
29	October 10, 2015	26
30	October 16, 2015	26
31	October 19, 2015	2
32	October 21, 2015	1
33	November 14, 2015	2

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

#### FORFEITURE ALLEGATION

As a result of the offenses alleged in Counts 1 through 33 of this Indictment, pursuant to 18 U.S.C. § 2253 and 21 U.S.C. § 853 as specified at 18 U.S.C. § 2253(b), the defendant, JASON D. BOUDREAU, shall forfeit to the United States of America any and all property constituting visual depictions as described in 18 U.S.C. § 2253(a)(1); any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense as described in 18 U.S.C. § 2253(a)(2); and 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 as described in 18 U.S.C. §  
2253(a)(3).

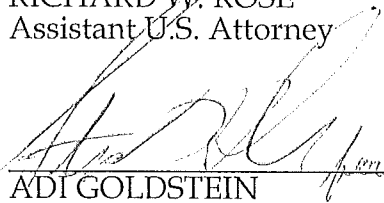
A TRUE BILL:

**REDACTED**

PETER F. NERONHA  
United States Attorney



RICHARD W. ROSE  
Assistant U.S. Attorney



ADI GOLDSTEIN  
Criminal Chief,  
Assistant U.S. Attorney

Date: February 16, 2016

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT CASE NO. **CR 16** **11M**Matter Sealed: ☐ Juvenile ☐ Other than Juvenile☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added  
☐ Indictment ☐ Charges/Counts Added  
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND  
DISTRICT OF RHODE ISLAND Divisional OfficeName and Office of Person  
Furnishing Information on  
THIS FORM PETER F. NERONHA  
☒ U.S. Atty ☐ Other U.S. Agency  
Phone No. (401) 709-5043Name of Asst.  
U.S. Attorney RICHARD W. ROSE  
(if assigned)

## PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)  
Homeland Security Investigations☐ person is awaiting trial in another Federal or State Court  
(give name of court)☐ this person/proceeding transferred from another district  
per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges  
previously dismissed which were  
dismissed on motion of:☐ U.S. Atty ☐ Defense☐ this prosecution relates to a  
pending case involving this same  
defendant. (Notice of Related  
Case must still be filed with the  
Clerk.)☒ prior proceedings or appearance(s)  
before U.S. Magistrate Judge  
regarding this defendant were  
recorded underSHOW  
DOCKET NO.MAG. JUDGE  
CASE NO.

1:15-MJ-399-LDA

Place of  
offense RHODE ISLAND County

USA vs.

Defendant: Jason D. Boudreau

Ac

**REDACTED**E  
C☐ Alien  
if applicableIssue: ☐ Warrant ☐ Summons

Location Status:

Arrest Date 12/30/2015 or Date Transferred to Federal Custody☒ Currently in Federal Custody☐ Currently in State Custody☐ Writ Required☐ Currently on bond☐ FugitiveDefense Counsel (if any): Olin W. Thompson, Esq.☒ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☒ This report amends AO 257 previously submitted

## OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 1-33

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1-33	18 U.S.C. § 2252(a)(4)(B) and (b)(2)	Accessing with Intent to View Child Pornography	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
Max	Penalty for each count: 10 yrs mandatory min.	to 20 years imprisonment; \$250,000 fine; 5 years to	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		life S/R; & \$100 assessment.	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 4	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor