

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:12-CR-418-T-27MAP

RONALD WILLIAM BROWN

**NOTICE OF MAXIMUM PENALTY, ELEMENTS OF OFFENSE,
PERSONALIZATION OF ELEMENTS AND FACTUAL BASIS**

Counts One, Two, and Three each charge the defendant with Possession of Child Pornography in violation of 18 U.S.C. § 2252A(a)(5)(B) and (b)(2).

Counts Four through Eight each charge the defendant with Receipt of Child Pornography, in violation of 18 U.S.C. § 2252A(a)(2) and (b)(1).

The essential elements of a violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2), for Possession of Child Pornography, are as follows:

- First: The Defendant knowingly possessed an item of child pornography;
- Second: The item of child pornography had been mailed, or shipped or transported in interstate or foreign commerce including by computer; or was produced using materials that had been mailed, or shipped or transported in and affecting interstate or foreign commerce including by computer; and
- Third: When the Defendant possessed the item, the Defendant believed the item was child pornography.

The essential elements of a violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1), for Counts Four through Eight, for Receipt of Child Pornography, are as follows:

- First: The Defendant knowingly received an item of child pornography;
- Second: The item of child pornography had been mailed, or shipped or transported in interstate or foreign commerce, including by computer; and
- Third: That when the Defendant received the item, the defendant believed the item was child pornography.

PENALTY

Counts One, Two, and Three of the Indictment, which charge Possession of Child Pornography, each carry a maximum sentence of ten years imprisonment, a fine of \$250,000.00, and a minimum term of supervised release of five years up to life. Counts Four, Five, Six, Seven, and Eight, which charge Receipt of Child Pornography, each carry a minimum mandatory five years imprisonment, up to a maximum of twenty years, a fine of \$250,000.00, and a minimum term of supervised release of five years up to life. Also, Counts One through Eight each carry a \$100.00 Special Assessment which is due on the date of sentencing.

FACTUAL BASIS

On approximately May 23, 2012, Michael ARNETT was arrested by Homeland Security Investigations in Kansas City for the production of child

pornography, including bondage type photographs, involving four child victims. On May 15, 2012, a search warrant had been conducted at Arnett's residence and computers were seized which were forensically analyzed. Through the forensic examination of Arnett's computers, it was discovered that Arnett had been communicating and exchanging child pornography materials with other individuals using online chat programs, as well as engaging in extremely graphic discussions regarding the kidnapping, sexually abusing, murdering and eating of children. One of the individuals that Arnett was discussing the abuse, abduction, murder and cannibalism of children with was using the Yahoo screen name: uelime. A subpoena directed to Yahoo for screen name: "uelime" showed that it belonged to the defendant, Ronald Brown. Law enforcement noted that additional email addresses listed as associated with the screen name "uelime" were ronald.brown9@gte.net and ronald.brown9@verizon.net. Additionally, subpoenaed Internet Protocol address information from Verizon internet services showed that Brown communicated with Arnett from his Dell Inspiron home computer using the "uelime" Yahoo! account.

On July 19, 2012, law enforcement conducted a search of Ronald Brown's residence in Largo, Florida pursuant to a search warrant. During the search, law enforcement seized multiple pieces of electronic media including, but not limited to a computer, various CD/DVDS, micro disks, cameras and a thumb drive. A forensic review of Brown's electronic media showed that Brown

possessed hundreds of images of child pornography and child erotica including various images showing children being bound and tortured. Additionally, Brown had hundreds of images of deceased children. On the Dell Computer, Brown possessed numerous images of child pornography, including two images of a naked baby whose hands are bound to his legs which are separated and splayed apart displaying his genitalia in a lewd and lascivious manner. This baby victim has been identified by law enforcement and the images were taken in California and thus, traveled in interstate commerce. Other child pornography images on Brown's Dell computer depicted identified child victims whose images were taken from outside of Florida and included images of naked prepubescent boys engaged in sexual acts.

On July 19, 2012, Brown was also found to possess child pornography on various floppy discs which were manufactured outside of the state of Florida as alleged in Count Two. Specifically, on floppy discs Brown possessed known child pornography images of children from various areas including images of a prepubescent boys from Illinois, and bondage images from Wisconsin. Further, as alleged in Count Three of the Indictment, on July 19, 2012, Brown also possessed numerous images of child pornography on optical discs which were manufactured in Taiwan.

A forensic review of the computer further revealed that on May 28, 2012, Brown knowingly received multiple child pornography images from an individual

with whom Brown had engaged in an online chat. Specifically, an individual using the email address "Karstenhohne@gmail.com" wrote to Brown, "have pics of nude boys and any babies too" and "some boys are tie-up" to which Brown responded, " Oh, I would enjoy seeing the boys who are tied up." Later in the chat, Brown wrote, "Yes, I like to see them ppeeing and tied." In response to his receipt of one image, Brown responded, "Would love to snuff him". Further, Brown wrote, "I like the tied boy. Looks like he will be killed" and "The tied ones are the best."

On the dates and times alleged in the indictment, Brown received various child pornography images by computer, a facility of interstate commerce, and the images traveled in interstate commerce via the Yahoo! servers which are located in California. During the chat on May 28, 2012, at approximately 3:53 p.m., Brown received a child pornography image titled "boundchinese05.jpg." At approximately 4:13 p.m. on May 28, 2012, Brown received a child pornography image titled "1337495756746.jpg." At approximately 4:19 p.m. on May 28, 2012, Brown received a child pornography image titled "NS Jimmy9.jpg." At approximately 4:29 p.m. on May 28, 2012, Brown received a child pornography image titled "130522649125.jpg." At approximately 4:55 p.m., on May 28, 2012, Brown received a child pornography image titled "133471203791.jpg."

During a post arrest, post Miranda interview, Brown admitted that he used the Yahoo Instant Messenger (IM) screen name of "uelime" to chat in Yahoo

Instant Messenger from his Dell desktop computer and admitted receiving child pornography images from an individual known to him as Karsten, and admitted that he created a folder on his desktop computer for images Karsten has sent him via Yahoo Instant Messenger. The defendant used the items listed in the Forfeiture section of the Superseding Indictment in committing the charged offenses.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2012, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

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