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WESTERN DISTRICT OF LOUISIANA

UNITED STATES DISTRICT COURT

SHREVEPORT DIVISION

TONY R. MOORE, CLERK BY - E DEPUTY

UNITED STATES OF AMERICA		* CRIMINAL NO. * 6:11 C RO 0 1.4	
VERSUS		* 18 U.S.C. 2251(d)(1) & (e) * 18 U.S.C. 2252A(a)(2)(A) &(b)(1)	
JOHN DOE #1 a.k.a. twitched	(1)	* * JUDGE HICKS *	
JOHN DOE #2 a.k.a. howardhughes	(2)	* MAGISTRATE JUDGE HORNSBY * *	
JOHN DOE #3 a.k.a. PredX	(3)	* * *	
JOHN DOE #4 a.k.a. VladimirPutin	(4)	* *	
JOHN DOE #5 a.k.a. Damit	(5)	* *	
JOHN DOE #6 a.k.a. MrSalty a.k.a. milkduds a.k.a. urinalcake	(6)	* * * *	
JOHN DOE #7 a.k.a. checkmate a.k.a. timesink	(7)	* * * *	
JOHN DOE #8 a.k.a. unclebuck81	(8)	* * *	
JOHN DOE #9 a.k.a. prjb a.k.a. koan	(9)	* * *	

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JOHN DOE #10 a.k.a. zapper a.k.a. jmagic	(10)	* * *
JOHN DOE #11 a.k.a. Rudy	(11)	* * *
JOHN DOE #12 a.k.a. Templar a.k.a. shuffle	(12)	* *
JOHN DOE# 13 a.k.a. korneech08	(13)	* *
JOHN DOE #14 a.k.a. wildman	(14)	*
JOHN DOE #15 a.k.a. samsackk	(15)	**
JOHN DOE #16 a.k.a. Kitsu	(16)	*
JOHN DOE #17 a.k.a. mokoloko69	(17)	* *
JOHN DOE #18 a.k.a. PataPata	(18)	*
JOHN DOE #19 a.k.a. zaxx a.k.a. zaxxter	(19)	*
JOHN DOE #20 a.k.a. TheShadow	(20)	* *
JOHN DOE # 21 a.k.a. Camy a.k.a. Blondie a.k.a. Lorwyn	(21)	*
JOHN DOE # 22 a.k.a. DaMan	(22)	*

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

Conspiracy to Advertise the Distribution of Child Pornography 18 U.S.C. 2251(d)(1) & (e)

Beginning on or about the 8th day of January, 2008, and continuing until on or about the 31st day of August, 2010, in the Western District of Louisiana and elsewhere, the defendants, JOHN DOE #1 a.k.a. twitched, JOHN DOE #2 a.k.a. howardhughes, JOHN DOE #3 a.k.a. PredX, JOHN DOE #4 a.k.a. VladimirPutin, JOHN DOE #5 a.k.a. Damit, JOHN DOE #6 a.k.a. MrSalty, a.k.a. milkduds, a.k.a. urinalcake, JOHN DOE #7 a.k.a. checkmate, a.k.a. timesink, JOHN DOE #8 a.k.a. unclebuck81, JOHN DOE #9 a.k.a. prjb, a.k.a. koan, JOHN DOE #10 a.k.a. zapper, JOHN DOE #11 a.k.a. Rudy, JOHN DOE #12 a.k.a. Templar, a.k.a. shuffle, JOHN DOE #13 a.k.a. korneech08, JOHN DOE #14 a.k.a. wildman, JOHN DOE #15 a.k.a. samsackk, JOHN DOE #16 a.k.a. Kitsu, JOHN DOE #17 a.k.a. mokoloko69, JOHN DOE #18 a.k.a. PataPata, JOHN DOE #19 a.k.a. zaxx, a.k.a. zaxxter, JOHN DOE #20 a.k.a. TheShadow, JOHN DOE # 21 a.k.a. Camy, a.k.a. Blondie, a.k.a. Lorwyn, JOHN DOE #22 a.k.a. DaMan and others both known and unknown to the Grand Jury, did knowingly and intentionally conspire confederate and agree together and with others both known and unknown to the Grand Jury, to commit the crime of advertising child pornography in violation of Title 18 United States Code, Section 2251(d)(1).

MANNER AND MEANS OF THE CONSPIRACY

Participants in the conspiracy were members of an on-line internet bulletin board, entitled Dreamboard, in which members posted advertisements offering child pornography for distribution, and distributed child pornography to other members.

In order to advertise the child pornography for distribution, members would post a description of the child pornography that they were making available for distribution as well as sample images of the child pornography. They would also supply a web site address where the child pornography was located and a password necessary to download the material.

Administrators of Dreamboard dictated the rules of the internet bulletin board and determined if one could become a member of the bulletin board. Members of the Dreamboard were segregated into groups. If one were given membership to the Dreamboard, the administrator would dictate in which group the member would be placed. Each group of members had access to specific parts of the internet bulletin board where child pornography was advertised.

According to the rules of Dreamboard, groups included "Super VIP.", "Super VIP", VIP, and member.

According to the rules of Dreamboard, "Super VIP." members were producers of child pornography that advertised child pornography that they had produced

According to the rules of Dreamboard, "Super VIP" members were considered trusted members of the web site. As such they were able to see more posted advertisements than other members.

According to the rules of Dreamboard, the final two groups were VIP members and members. In order to move to a higher group on Dreamboard one could post more

advertisements for child pornography, post advertisements for child pornography the member had produced or post advertisements or child pornography that no other member possessed.

All in violation of Title 18 United States Code, Section 2251(d)(1) &(e).

COUNT 2

Conspiracy to Distribute Child Pornography 18 U.S.C. 2252A(a)(2)(A) & (b)(1)

Beginning on or about the 8th day of January, 2008, and continuing until on or about the 31st day of August, 2010, in the Western District of Louisiana and elsewhere, the defendants, JOHN DOE #1 a.k.a. twitched, JOHN DOE #2 a.k.a. howardhughes, JOHN DOE #3 a.k.a. PredX, JOHN DOE #4 a.k.a. VladimirPutin, JOHN DOE #5 a.k.a. Damit, JOHN DOE #6 a.k.a. MrSalty, a.k.a. milkduds, a.k.a. urinalcake, JOHN DOE #7 a.k.a. checkmate, a.k.a. timesink, JOHN DOE #8 a.k.a. unclebuck81, JOHN DOE #9 a.k.a. prjb, a.k.a. koan, JOHN DOE #10 a.k.a. zapper, JOHN DOE #11 a.k.a. Rudy, JOHN DOE #12 a.k.a. Templar, a.k.a. shuffle, JOHN DOE #13 a.k.a. korneech08, JOHN DOE #14 a.k.a. wildman, JOHN DOE #15 a.k.a. samsackk, JOHN DOE #16 a.k.a. Kitsu, JOHN DOE #17 a.k.a. mokoloko69, JOHN DOE #18 a.k.a. PataPata, JOHN DOE #19 a.k.a. zaxx, a.k.a. zaxxter, JOHN DOE #20 a.k.a. TheShadow, JOHN DOE # 21 a.k.a. Camy, a.k.a. Blondie, a.k.a. Lorwyn, JOHN DOE #22 a.k.a. DaMan and others both known and unknown to the Grand Jury, did knowingly and intentionally conspire confederate and agree together and with others both known and unknown to the Grand Jury, to commit the crime of distribution of child pornography in violation of Title 18 United States Code, Section 2252A(a)(2)(A).

MANNER AND MEANS OF THE CONSPIRACY

The United States adopts the factual allegations presented in Count 1 of the Indictment as the manner and means of the conspiracy.

All in violation of Title 18 United States Code, Section 2252A(a)(2)(A) & (b)(1).

A TRUE BILL:

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