

CR 19 - 203 JNE/BRT

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 2

v.

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

1. ADAM LEE REITZ, and

18 U.S.C. § 2252(a)(2)

2. SHAHLA MARIE THOMPSON,

18 U.S.C. § 2252(b)(1)

18 U.S.C. § 2253(a)

18 U.S.C. § 2253(b)

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Production of Child Pornography)

On or about August 25, 2017, in the State and District of Minnesota, the defendants,

**ADAM LEE REITZ, and
SHAHLA MARIE THOMPSON,**

each aiding and abetting the other, did employ, use, persuade, entice, and coerce, a known Minor Victim to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, including the following digital photographs:

File Name	Description
20170825_010658.jpg	A photograph depicting Reitz holding his penis while he has the Minor Victim put his/her mouth/lips next to Reitz's penis. The Minor Victim appears to be naked except for a dark cloth obscuring the Minor Victim's eyes.
20170825_010722.jpg	A photograph depicting Reitz holding his penis while the Minor Victim has his/her mouth around Reitz's penis. The Minor Victim appears to be naked except for a dark cloth obscuring the Minor Victim's eyes.
20170825_010732.jpg	A photograph depicting Reitz holding his penis while the Minor Victim has his/her mouth around Reitz's penis. The Minor Victim appears to be naked except for a dark cloth obscuring the Minor Victim's eyes.

20170825_010819.jpg	A photograph depicting the Minor Victim with his/her mouth/lips next to Reitz's penis and the Minor Victim is touching Reitz's scrotum. The Minor Victim appears to be naked except for a dark cloth obscuring the Minor Victim's eyes.
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which visual depictions were produced using materials, including an LG K20 Plus cell phone, IMEI number 355266085192167, that had been mailed, shipped, and transported in interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2, 2251(a) and 2251(e).

COUNT 2
(Distribution of Child Pornography)

On or about March 29, 2018, in the State and District of Minnesota, the defendant,

ADAM LEE REITZ,

knowingly distributed visual depictions using a means and facility of interstate and foreign commerce that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such depictions were of such conduct, including but not limited to the following child pornography image: a conversation on Facebook messenger between the Facebook accounts of "nunyafukka" and "Sha Marie" that contained a photograph of an adult male about to engage in anal intercourse with a pre-pubescent female child, approximately 8 years old. The man's penis is erect.

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

COUNT 3
(Receipt of Child Pornography)

On or about March 29, 2018, in the State and District of Minnesota, the defendant,

SHAHLA MARIE THOMPSON,

knowingly received visual depictions using a means and facility of interstate and foreign commerce and that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, including but not limited to the following child pornography image: a conversation on Facebook messenger between the Facebook accounts of “nunyafukka” and “Sha Marie” containing a photograph of an adult male about to engage in anal intercourse with a pre-pubescent female child, approximately 8 years old. The man’s penis is erect.

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

FORFEITURE ALLEGATIONS

Counts 1-3 of this Indictment are hereby re-alleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, 2253(a).

As a result of the offenses charged in Counts 1-3 of the Indictment, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film videotape, or other matter that contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) 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, including, but not limited to:

LG K20 Plus cell phone, IMEI number 355266085192167.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2, 2251, 2252, 2253(a), and 2253(b).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON