



COUNT I

17. Paragraphs 1-16 of this Indictment are re-alleged and incorporated by reference as though set forth in full herein.

18. Between on or about October 12, 2012, and on or about December 8, 2012, in the District of Nebraska and elsewhere, JASON FLANARY a/k/a [REDACTED], the defendant herein, and others known and unknown to the Grand Jury, did knowingly engage in a child exploitation enterprise, that is, JASON FLANARY a/k/a [REDACTED], violated Chapter 110 of Title 18 of the United States Code, as a part of a series of felony violations constituting three or more separate incidents and involving more than one minor victim, which offenses are described in Counts IV – VII of this Indictment, incorporated herein, and committed those offenses in concert with three or more other persons.

In violation of Title 18, United States Code, Section 2252A(g).

COUNT II

19. Paragraphs 1-16 of this Indictment are re-alleged and incorporated by reference as though set forth in full herein.

20. Between on or about October 12, 2012, and on or about December 8, 2012, in the District of Nebraska and elsewhere, JASON FLANARY a/k/a [REDACTED], the defendant herein, and others known and unknown to the Grand Jury, did knowingly conspire to make, print, and publish, and cause to be made, printed, and published, any notice and advertisement seeking and offering to receive, exchange, buy, produce, display,

distribute, and reproduce, any visual depiction, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct; and participation in any act of sexually explicit conduct by and with any minor for the purpose of producing a visual depiction of such conduct; knowing and having reason to know that such notice or advertisement would be transported using any means or facility of interstate or foreign commerce and in or affecting interstate and foreign commerce by any means, including by computer, and such notice and advertisement was transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(d)(1) and (e).

COUNT III

21. Paragraphs 1-16 of this Indictment are re-alleged and incorporated by reference as though set forth in full herein.

22. Between on or about October 12, 2012, and on or about December 8, 2012, in the District of Nebraska and elsewhere, JASON FLANARY a/k/a [REDACTED], the defendant herein, and others known and unknown to the Grand Jury, knowingly conspired to distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and that has been shipped and transported using any means and facility of interstate or foreign commerce.

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

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COUNT IV

24. On or about October 12, 2012, in the District of Nebraska and elsewhere, JASON FLANARY a/k/a [REDACTED], defendant herein, knowingly transported and shipped, using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, any child pornography, as defined in Title 18 United States Code Section 2256(8)(A).

In violation of Title 18, United States Code, Section 2252A(a)(1).

COUNT V

25. On or about October 13, 2012, in the District of Nebraska and elsewhere, JASON FLANARY a/k/a [REDACTED], defendant herein, knowingly transported and shipped, using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, any child pornography, as defined in Title 18 United States Code Section 2256(8)(A).

In violation of Title 18, United States Code, Section 2252A(a)(1).

COUNT VI

26. On or about October 14, 2012, in the District of Nebraska and elsewhere, JASON FLANARY a/k/a [REDACTED], defendant herein, knowingly transported and shipped, using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, any child

pornography, as defined in Title 18 United States Code Section 2256(8)(A).

In violation of Title 18, United States Code, Section 2252A(a)(1).

COUNT VII

27. On or about October 16, 2012, in the District of Nebraska and elsewhere, JASON FLANARY a/k/a [REDACTED], defendant herein, knowingly transported and shipped, using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, any child pornography, as defined in Title 18 United States Code Section 2256(8)(A).

In violation of Title 18, United States Code, Section 2252A(a)(1).

FORFEITURE ALLEGATION

28. Upon conviction for violating an offense involving a visual depiction described in Title 18, United States Code, Section 2252A, defendant, JASON FLANARY a/k/a [REDACTED], shall forfeit to the United States any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforesaid to violation, including but not limited to the following:

Flash drive

Memory card

notebook

All in violation of Title 18, United States Code, Section 2253.

A TRUE BILL:

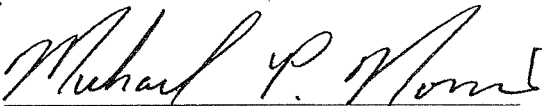


DEBORAH R. GILG
United States Attorney

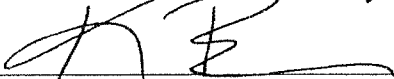


FOUR PERSON

The United States of America requests that trial of this case be held at Omaha, Nebraska, pursuant to the rules of this Court.



MICHAEL P. NORRIS
Assistant United States Attorney



KEITH A. BECKER
Trial Attorney