

**ORIGINAL**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

FILED  
U.S. DISTRICT COURT  
NORTHERN DIST. OF TX  
FT. WORTH DIVISION

2014 NOV 12 PM 2:53

UNITED STATES OF AMERICA

NO. 3:14-CR-0258-M

CLERK OF COURT

v.

(Supersedes Indictment returned on  
7/01/14)

TRENTON LAVIAL MCLEMORE

SUPERSEDING INDICTMENT

The Grand Jury Charges:

Count One  
Sex Trafficking of Children  
(Violation of 18 U.S.C. § 1591(a)(1) and (b)(2))

From on or about August 1, 2013 through on or about September 19, 2013, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Trenton Laval McLemore**, knowingly recruited, enticed, harbored, transported, provided, obtained and maintained by any means, in and affecting interstate or foreign commerce, Jane Doe, who had not attained the age of 18 years, knowing or in reckless disregard of the fact that Jane Doe had not attained the age of 18 years and that Jane Doe would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. § 1591(a)(1) and (b)(2).

Count Two  
 Distribution of Child Pornography  
 (Violation of 18 U.S.C. §§ 2252A(a)(2) and 2252(b)(1))

On or about August 13, 2013 through on or about September 19, 2013, in the Dallas Division of the Northern District of Texas and elsewhere, defendant **Trenton Laval McLemore** knowingly distributed images of child pornography using any means and facility of interstate and foreign commerce in or affecting interstate or foreign commerce by any means, including by computer, knowing the production of such visual depiction involves the use of a minor, Jane Doe, engaging in sexually explicit conduct and such visual depiction is of such conduct. Specifically, **McLemore** used a cellular phone to distribute the following visual depictions of a minor engaged in sexually explicit conduct:

File name	Description of the image
IMG_20130806_095157.jpg	A lewd and lascivious image depicting Jane Doe, a minor female, lying on a bed on her side with her legs open, exposing her genitals.
IMG_20130806_095058.jpg	A lewd and lascivious image depicting Jane Doe, a minor female, on a bed on her elbows and knees, with her anus and genitals exposed and part of her face displayed.
IMG_20130806_095030.jpg	A lewd and lascivious image depicting Jane Doe, a minor female on a bed on her elbows and knees, with her anus and genitals exposed.

In violation of 18 U.S.C. §§ 2252A(a)(2) and 2252(b)(1).

Count Three  
 Possession of Child Pornography  
 (Violation of 18 U.S.C. § 2252A(a)(5)(b))

On or about August 13, 2013 through on or about September 19, 2013, in the Dallas Division of the Northern District of Texas, defendant **Trenton Livial McLemore**, knowingly possessed material that contained images of child pornography that were mailed, shipped and transported in interstate commerce by any means, including by computer, and which were produced using materials that had been mailed, shipped and transported in interstate and foreign commerce, which include visual depictions of sexually explicit conduct of a minor, and of the lewd and lascivious exhibition of the genitals and pubic area of a minor, as defined in Title 18 U.S.C. §2256. Included on his cellular phone were the following:

<b>File name</b>	<b>Description of the image</b>
.thumbdata3--139348620_embedded_16.jpg	A lewd and lascivious image depicting Jane Doe, a minor female, lying on a bed with her legs open, exposing her genitals.
.thumbdata3--139348620_embedded_21.jpg	A lewd and lascivious image depicting Jane Doe, a minor female, on a bed on her knees, with her anus and genitals exposed.
.thumbdata3--139348620_embedded_26.jpg	A lewd and lascivious image depicting Jane Doe, a minor female, lying on a bed with her legs open, exposing her stomach and genitals.

In violation of 18 U.S.C. § 2252A(a)(5)(b).

Count Four  
Tampering with a Victim by Intimidation and Threats  
(Violation of 18 U.S.C. § 1512(b)(1))

From on or about January 26, 2013 through the present the exact dates being unknown, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, **Trenton Laval McLemore**, did knowingly attempt to threaten, intimidate and corruptly persuade and did threaten, intimidate and corruptly persuade Jane Doe, the minor victim in Counts One through Three, by: (1) personally placing telephone calls and writing letters to Jane Doe with the intent to influence and prevent the testimony of Jane Doe as well as Jane Doe's mother in an official proceeding, namely the criminal case, *United States v. Trenton Laval McLemore*, 3:13-MJ-751- BK and 3:14-CR-258-M and (2) enlisting another person, T.L.S., to call and visit Jane Doe, the minor victim in Counts One through Three, with the intent to influence and prevent the testimony of Jane Doe as well as Jane Doe's mother in an official proceeding, namely the criminal case, *United States v. Trenton Laval McLemore*, 3:13-MJ-751- BK and 3:14-CR-258-M.

In violation of 18 U.S.C. § 1512(b)(1).

Forfeiture Notice  
(18 U.S.C. § 2253)

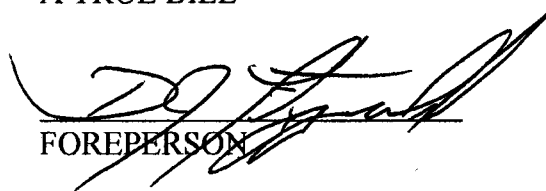
Upon conviction of the offense alleged in Count One, and pursuant to 18 U.S.C. 1594(d), defendant **Trenton Laval McLemore** shall forfeit to the United States of America any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation and any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of such violation.

Upon conviction of the offenses alleged in Counts Two or Three, and pursuant to 18 U.S.C. § 2253(a), defendant **Trenton Laval McLemore** shall forfeit to the United States of America (a) any visual depiction described in 18 U.S.C. § 2252A and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in the offense; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of the respective offense and any property traceable to such property.

The above-referenced property subject to forfeiture includes, but is not limited to, the following:

1. an Huawei M835 cellular telephone.

A TRUE BILL

  
FOREPERSON

SARAH R. SALDAÑA  
UNITED STATES ATTORNEY

  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

VS.

TRENTON LAVIAL MCLEMORE

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SUPERSEDING INDICTMENT

18 U.S.C. § 1591(a)(1) and (b)(2)  
Sex Trafficking of Children

18 U.S.C. §§ 2252A(a)(2) and 2252(b)(1)  
Distribution of Child Pornography

18 U.S.C. § 2252A(a)(5)(b)  
Possession of Child Pornography

18 U.S.C. § 1512(b)(1)  
Tampering with a Victim by Intimidation and Threats

18 U.S.C. § 2253  
Forfeiture Notice

(4 COUNTS)

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A true bill rendered:

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FORT WORTH

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FOREPERSON

Filed in open court this 12 day of November, A.D. 2014.

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Custody status: In Federal Custody Since 7/30/2014

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U.S. DISTRICT COURT JUDGE  
3:14-CR-258-M