

ORIGINAL

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

UNITED STATES OF AMERICA

v.

JON ANTHONY TERRY

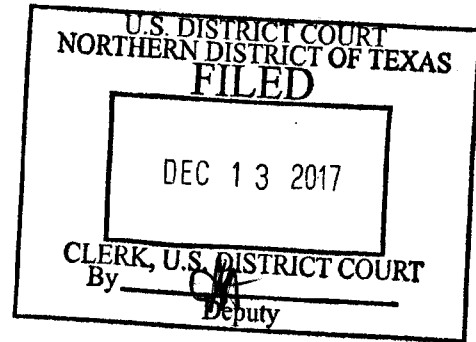
NO. **3-17 CR-647-M**

INDICTMENT

The Grand Jury Charges:

Count One

Production of Child Pornography
(Violation of 18 U.S.C. § 2251(a))



On or about April 2, 2017, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendant, **Jon Anthony Terry**, used, persuaded, induced, and enticed, John Doe #1, a person under the age of eighteen (18) years, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, and by using a cell phone, to create a visual depiction of John Doe #1, a minor who was then less than twelve years of age, depicting sexually explicit conduct including the lascivious exhibition of the genitals and pubic area of John Doe #1, as defined in 18 U.S.C. § 2256, including the following:

File Name	Description
IMG_2189 (2017_06_21 01_54_05 UTC).MOV	A video file depicting John Doe #1 on a mattress. His red shorts are pulled down exposing his genitals. Terry touches the boy's genitals with his hand and places his mouth on the boy's penis.

In violation of 18 U.S.C. § 2251(a).

Count Two
Production of Child Pornography
(Violation of 18 U.S.C. § 2251(a))

On or about April 30, 2017, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendant, **Jon Anthony Terry**, used, persuaded, induced, and enticed, John Doe #1, a person under the age of eighteen (18) years, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, and by using a cell phone, to create visual depictions of John Doe #1, a minor who was then less than twelve years of age, depicting sexually explicit conduct including the lascivious exhibition of the genitals and pubic area of John Doe #1, as defined in 18 U.S.C. § 2256, including the following:

File Name	Description
IMG_2214 (2017_06_21 01_54_05 UTC).MOV	A video file depicting John Doe #1 on a mattress. The boy's shorts are pulled down. Terry licks the boy's anus with his tongue and touches the boy's penis with his hand.
IMG_2215 (2017_06_21 01_54_05 UTC).MOV	A video file depicting John Doe #1 on a mattress. Terry places a dildo on the boy's anus and then penetrates the boy's anus with his penis.

In violation of 18 U.S.C. § 2251(a).

Count Three
Production of Child Pornography
(Violation of 18 U.S.C. § 2251(a))

On or about March 11, 2013 in the Dallas Division of the Northern District of Texas, and elsewhere, the defendant, **Jon Anthony Terry**, used, persuaded, induced, and enticed, John Doe #2, a person under the age of eighteen (18) years, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, and by using a cell phone, to create visual depictions of John Doe #2, a minor who was then less than twelve years of age, depicting sexually explicit conduct including the lascivious exhibition of the genitals and pubic area of John Doe #2, as defined in 18 U.S.C. § 2256, including the following:

File Name	Description
2013 -03- 11 18.10.47.MOV	A video file depicting John Doe #2. The boy's genitals are exposed. Terry's penis is touching the boy's penis. Then Terry's penis is between the boy's feet. Terry tells the boy to "suck it." The boy says "no." Terry says, "one time." The boy says "no." Terry says, "I'll suck yours." The boy says, "take the picture first." The boy squeezes Terry's penis with his feet and says, "I'm squeezing it." The boy says, "take the picture," and Terry says "ok, ok." The boy says, "take the picture" and Terry says, "I did." The boy says, "let me see."

In violation of 18 U.S.C. § 2251(a).

Count Four
Production of Child Pornography
(Violation of 18 U.S.C. § 2251(a))

On or about August 12, 2017, in the Dallas Division of the Northern District of Texas, and elsewhere, the defendant, **Jon Anthony Terry**, used, persuaded, induced, and enticed, John Doe #3, a person under the age of eighteen (18) years, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, and by using a cell phone, to create visual depictions of John Doe #3, a minor who was then less than twelve years of age, depicting sexually explicit conduct including the lascivious exhibition of the genitals and pubic area of John Doe #3, as defined in 18 U.S.C. § 2256, including the following:

File Name	Description
ba0027b419dac68011de4724692fcfa6f7bf73e5	A video file depicting John Doe #3 on a mattress. Terry licks the boy's penis and places the boy's penis in his mouth. When Terry tries to hold the boy's penis, the boy pushes his hand away.

In violation of 18 U.S.C. § 2251(a).

Count Five
Possession of Prepubescent Child Pornography
(Violation of 18 U.S.C. § 2252A(a)(5)(B))

On or about, November 14, 2017, in the Dallas Division of the Northern District of Texas, the defendant, **Jon Anthony Terry**, knowingly possessed material that contained images and videos 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 prepubescent minors, and of the lewd and lascivious exhibition of the genitals and pubic area of prepubescent minors, as defined in 18 U.S.C. § 2256. Included on his Western Digital My Passport external hard drive, bearing serial number WXM1AC6NS951, were the following:

File Name:	Description:
boy+man 2-4 years toddler boy old-asshole fuck.avi	A video file depicting a man penetrating the anus of a nude prepubescent boy with his penis.
Olaf Framke Collection v0004 - Gay Boys Anal Blowjob Hardcore Sex Pedo Lolita Rape Bondage Hentai Fkk Kiddy Preteen Underage Pthc.mpg	A video file depicting a man penetrating the genitals of a nude prepubescent girl.

(Pthc) Kdv - Mikael - 8Yr Boy Deep Throat Big Cock Amazing (Gay Pt).avi	A video file depicting a male penetrating the mouth and anus of a nude prepubescent boy with his penis.
Rus Kdv Yoboy - Man Suck Fuck Boy2.mpg	A video file depicting an male penetrating the mouth of a nude prepubescent boy with his penis.

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

Forfeiture Notice
(18 U.S.C. § 2253)

Upon conviction of any of the offenses alleged in Counts One through Six and pursuant to 18 U.S.C. § 2253(a), the defendant, **Jon Anthony Terry**, shall forfeit to the United States of America (a) any visual depiction described in 18 U.S.C. § § 2252A, and 2252, 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 respective offense; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the respective offense; and 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 from the previously-mentioned defendant includes, but is not limited to, any interest in the following:

1. Apple iPhone, bearing IMEI number 355376073074192;
2. Apple iPad, bearing IMEI number 358849054076946;
3. Corsair Force GT hard drive, bearing serial number 11476500000011570214;
4. Seagate Barracuda hard drive, bearing serial number Z560H5BH;
5. Western Digital My Passport external hard drive, bearing serial number WXM1AC6NS951.

A TRUE BILL

L. Humil

FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY

Camille E Sparks

CAMILLE E. SPARKS

Assistant United States Attorney

Texas State Bar No. 00790878

1100 Commerce Street, Third Floor

Dallas, Texas 75242-1699

Telephone: 214.659.8600

Facsimile: 214.659.8805

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18 U.S.C. § 2251(a)
Production of Child Pornography

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

18 U.S.C. § 2253
Forfeiture Notice

5 Counts

A true bill rendered

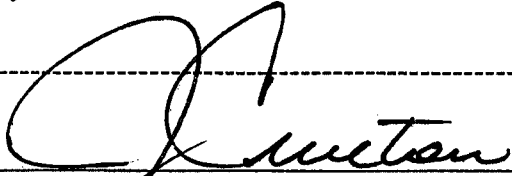
FORT WORTH

L. H. H. H.

FOREPERSON

Filed in open court this 13th day of December, 2017.

Defendant in Federal Custody since 11/15/2017.

A handwritten signature in black ink, appearing to read "J. M. Sutton", is written over a horizontal line.

UNITED STATES MAGISTRATE JUDGE
Magistrate Court Number: 3:17-MJ-835-BK