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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

CR 17 - 390 TUC RCC(BPV)

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

VICTIM

United States of America,

Plaintiff,

vs.

Paul Douglas Adams,

Defendant.

INDICTMENT

Violation:

18 U.S.C. §§ 2251(a) and (e)
(Production of Child Pornography)
Counts 1-8

18 U.S.C. §§ 2252(a)(2) and (b)(1)
(Distribution of Child Pornography)
Count 9

18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)
(Possession of Child Pornography)
Counts 10-11

THE GRAND JURY CHARGES:

COUNT 1

On or about June 20, 2015, at or near Bisbee, in the District of Arizona, the defendant, PAUL DOUGLAS ADAMS, did employ, use, persuade, induce, entice and coerce a person under the age of eighteen, to wit: M. A. (DOB: 2005), a minor child, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, using materials that have been mailed, shipped, and transported in and affecting interstate and

1 foreign commerce by any means, including by computer, and the visual depiction was
2 transported in and affecting interstate and foreign commerce, which visual depictions
3 include but are not limited to:

4 "California Girl 5. 9%3a13.mp4"

5 All in violation of Title 18, United States Code, Section 2251(a) and (e).

6 **COUNT 2**

7 Between on or about March 29, 2015 and on or about June 29, 2015, at or near
8 Bisbee, in the District of Arizona, the defendant, PAUL DOUGLAS ADAMS, did employ,
9 use, persuade, induce, entice and coerce a person under the age of eighteen, to wit: M. A.
10 (DOB: 2015), a minor child, to engage in sexually explicit conduct for the purpose of
11 producing visual depictions of such conduct, knowing and having reason to know that such
12 visual depiction would be transported using any means and facility of interstate and foreign
13 commerce, using materials that have been mailed, shipped, and transported in and affecting
14 interstate and foreign commerce by any means, including by computer, and which visual
15 depictions include but are not limited to:

16 "1440916662470.jpg"

17 "1440916663593.jpg"

18 "1440916645035.jpg"

19 All in violation of Title 18, United States Code, Sections 2251(a) and (e).

20 **COUNT 3**

21 Between on or about March 29, 2015 and on or about June 29, 2015, at or near
22 Bisbee, in the District of Arizona, the defendant, PAUL DOUGLAS ADAMS, did employ,
23 use, persuade, induce, entice and coerce a person under the age of eighteen, to wit: M. A.
24 (DOB: 2005) and M. A. (DOB: 2015), minor children, to engage in sexually explicit
25 conduct for the purpose of producing visual depictions of such conduct, knowing and
26 having reason to know that such visual depiction would be transported using any means
27 and facility of interstate and foreign commerce, using materials that have been mailed,
28

1 shipped, and transported in and affecting interstate and foreign commerce by any means,
2 including by computer, and which visual depictions include but are not limited to:

3 "1440916658281.jpg"

4 All in violation of Title 18, United States Code, Sections 2251(a) and (e).

5 **COUNT 4**

6 On or about January 28, 2016, at or near Bisbee, in the District of Arizona, the
7 defendant, PAUL DOUGLAS ADAMS, did employ, use, persuade, induce, entice and
8 coerce a person under the age of eighteen, to wit: M. A. (DOB: 2005), a minor child, to
9 engage in sexually explicit conduct for the purpose of producing visual depictions of such
10 conduct, knowing and having reason to know that such visual depiction would be
11 transported using any means and facility of interstate and foreign commerce, using
12 materials that have been mailed, shipped, and transported in and affecting interstate and
13 foreign commerce by any means, including by computer, and which visual depictions
14 include but are not limited to:

15 "IMG_20160128_214720.jpg"

16 "IMG_20160128_214946 - Copy.jpg"

17 All in violation of Title 18, United States Code, Section 2251(a) and (e).

18 **COUNT 5**

19 On or about January 29, 2016, in the District of Arizona, the defendant, PAUL
20 DOUGLAS ADAMS, did employ, use, persuade, induce, entice and coerce a person under
21 the age of eighteen, to wit: M. A. (DOB: 2005), a minor child, to engage in sexually explicit
22 conduct for the purpose of producing visual depictions of such conduct, knowing and
23 having reason to know that such visual depiction would be transported using any means
24 and facility of interstate and foreign commerce, using materials that have been mailed,
25 shipped, and transported in and affecting interstate and foreign commerce by any means,
26 including by computer, and which visual depictions include but are not limited to:

27 "VID_20160128_215827.mp4"

28 All in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT 6

On or about August 3, 2016, at or near Bisbee, in the District of Arizona, the defendant, PAUL DOUGLAS ADAMS, did employ, use, persuade, induce, entice and coerce a person under the age of eighteen, to wit: M. A. (DOB: 2015), a minor child, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depictions include but are not limited to:

"IMG_20160803_203414.jpg"

"IMG_20160803_204217.jpg"

All in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT 7

On or about August 4, 2016, at or near Bisbee, in the District of Arizona, the defendant, PAUL DOUGLAS ADAMS, did employ, use, persuade, induce, entice and coerce a person under the age of eighteen, to wit: M. A. (DOB: 2015), a minor child, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depictions include but are not limited to:

"VID_20160803_204505.mp4"

"VID_20160803_204227.mp4"

All in violation of Title 18, United States Code, Section 2251(a) and (e).

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1 visual depictions, the production of which involved the use of minors engaging in sexually
2 explicit conduct as defined in Title 18, United States Code, Section 2256(2), and which
3 depicted such conduct, and which depicted pre-pubescent minors, that had been mailed,
4 shipped and transported in interstate and foreign commerce by any means, including
5 computer, and which was produced using materials which had been mailed and shipped
6 and transported in interstate and foreign commerce; that is, PAUL DOUGLAS ADAMS
7 knowingly possessed on a Dell Xperion 15 laptop computer, s/n 8L9JC12, containing an
8 Adata hard drive, s/n 5707c18100087cdb, images of child pornography, including but not
9 limited to, the following files:

10 "38207CF122340323A44A390D18EA4C05BDE53508"

11 "3_400839552454885881.WMV"

12 "3_400839552454885872.mp4"

13 "4744fa7be768fc9f61e0499054c46e85.jpg"

14 "6xh5zisd.jpg"

15 "chair .wmv"

16 "Video 26-10-2015, 12 10 28 am.mp4"

17 All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and
18 (b)(2).

19 **COUNT 11**

20 On or about February 8, 2017, at or near Bisbee, in the District of Arizona, the
21 defendant, PAUL DOUGLAS ADAMS, did knowingly possess child pornography, that is,
22 visual depictions, the production of which involved the use of minors engaging in sexually
23 explicit conduct as defined in Title 18, United States Code, Section 2256(2), and which
24 depicted such conduct, and which depicted pre-pubescent minors, that had been mailed,
25 shipped and transported in interstate and foreign commerce by any means, including
26 computer, and which was produced using materials which had been mailed and shipped
27 and transported in interstate and foreign commerce; that is, PAUL DOUGLAS ADAMS
28 knowingly possessed on a Samsung Galaxy Note 3 Model SM-N900V, IMEI

COUNT 8

On or about August 22, 2016, at or near Bisbee, in the District of Arizona, the defendant, PAUL DOUGLAS ADAMS, did employ, use, persuade, induce, entice and coerce a person under the age of eighteen, to wit: M. A. (DOB: 2005), a minor child, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depictions include but are not limited to:

"IMG_20160822_005615.jpg"

"VID_20160822_005430.mp4"

"VID_20160822_011858.mp4"

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 9

Between on or about June 20, 2015 and on or about January 13, 2017, at or near Bisbee, in the District of Arizona, PAUL DOUGLAS ADAMS, using any means or facility of interstate or foreign commerce, did knowingly distribute child pornography, that is, visual depictions, the production of which involved the use of minors engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), and depicted pre-pubescent minors engaged in such conduct, which had been shipped and transported in interstate or foreign commerce by means of computer, or otherwise, including, but not limited to files entitled:

"California Girl 5. 9%3a13.mp4"

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

COUNT 10

On or about February 8, 2017, at or near Bisbee, in the District of Arizona, the defendant, PAUL DOUGLAS ADAMS, did knowingly possess child pornography, that is,

1 990004365491657, images of child pornography, including but not limited to, the
2 following files:

3 "1440916651091.jpg"

4 "1440916667106.jpg"

5 "1440916649997.jpg"

6 All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and
7 (b)(2).

8
9 A TRUE BILL

10 /s/
11 Presiding Juror

12
13 ELIZABETH A. STRANGE
14 Acting United States Attorney
District of Arizona

15 /s/
16 Assistant U.S. Attorney
17 DATED: March 8, 2017

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REDACTED FOR
PUBLIC DISCLOSURE