

**STATEMENT FOR THE RECORD OF**  
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**DEPARTMENT OF JUSTICE**  
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**HEARING ON THE CHILD PORNOGRAPHY GUIDELINES**  
**PRESENTED**  
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**Introduction**

Good morning, Chairwoman Saris, Vice Chairs Carr and Jackson, and Commissioners. Thank you for the opportunity to appear before the Commission today to discuss the Department's perspectives on the distribution, receipt, and possession of child pornography and the sentencing guideline that applies to those crimes.

In the last ten years, we have seen a sharp increase in the severity and depravity of child pornography offenses, fueled in large part by swiftly advancing technological changes which permit offenders to easily store large numbers of images of child sexual abuse, to create safe havens online where they can communicate and bond with other individuals who encourage and promote the sexual exploitation of children, and to utilize sophisticated methods to evade detection by law enforcement. This increase is reflected in the changes in the content of the images over time, as infants and toddlers are now regularly victimized by child pornography offenders and the victims are forced into more brutal and degrading sexual activity. Additionally, the technological changes that continue to make it easier for offenders to commit these crimes are reflected in the number of defendants prosecuted in federal court for child pornography offenses, which has increased every year for over ten years.

We are also seeing the crime change with respect to the technical complexity and sophistication of the offenders who exploit the developments in both software and hardware. Storage capacity on hard drives and external media has exploded at the same time that prices for such equipment have dropped, making it feasible for individuals cheaply to store millions of image and video files. Internet speeds have skyrocketed, allowing users to download a video in a matter of seconds that, just a few years ago, would have taken hours. At the same time, smart phones and the development of faster wireless networks have turned phones into a viable and portable alternative method to distribute and collect child pornography. New platforms are being constantly developed to allow individuals to chat, network, and share files. Child pornography offenders are early adopters of these platforms, co-opting them to further their criminal purpose and to create virtual communities that exist outside the bounds of normal society and that embrace and promote the sexual exploitation of children. Finally, offenders are exploiting the development of new technologies, such as evidence eliminating software, encryption, and methods to conceal their Internet activities, to evade detection by law enforcement. The result of these changes is clear: we are seeing more and more offenders, engaged in more sophisticated criminal conduct, exploiting a larger number of children in a more depraved way.

### **The Department's Response**

The Department of Justice responded to the evolution of this crime by implementing various measures to enhance the effectiveness of our law enforcement response. For example, in 2006 the Department launched Project Safe Childhood (PSC) to combat the proliferation of technology-facilitated crimes involving the sexual exploitation of children. The Department expanded PSC in May 2011 to encompass all federal crimes involving the sexual exploitation of a minor, including the sexual exploitation of children overseas by U.S. citizens, domestic sex

trafficking of minors, and crimes against children committed in Indian country. District by district, PSC coordinates efforts to protect our children by the development of a network of federal, state, and local law enforcement agencies and non-governmental organizations dedicated to the investigation and prosecution of offenders involved in the sexual exploitation of minors. PSC is implemented through partnerships including the following organizations: the United States Attorneys' Offices and the Executive Office for U.S. Attorneys; the Child Exploitation and Obscenity Section (CEOS) within the Department's Criminal Division; Internet Crimes Against Children (ICAC) Task Forces funded by the Office of Juvenile Justice and Delinquency Prevention (OJJDP) of the Department's Office of Justice Programs; federal law enforcement partners, including the FBI, the U.S. Postal Inspection Service (USPIS), the Department of Homeland Security's Immigration and Customs Enforcement (ICE), the United States Secret Service, the U.S. Marshals Service (USMS), and the Department of State's Bureau of Diplomatic Security; non-governmental organizations such as the National Center for Missing & Exploited Children (NCMEC); and state, local, tribal, and military law enforcement officials.

Under PSC, the number of international, federal, state, and local investigations and federal prosecutions involving child sexual exploitation has increased significantly. In fiscal year 2011, federal prosecutors obtained at least 2,713 indictments, against 2,929 defendants, for offenses involving the sexual exploitation of a minor. This represents a 42 percent increase in the number of indictments over fiscal year 2006 (in which 1,901 indictments were filed against 2,012 defendants). Since the beginning of fiscal year 2007, more than 11,447 defendants have been convicted in federal courts of offenses related to the sexual exploitation of a minor. These crimes have ranged from receipt, distribution, possession, and production of child pornography

to the sexual abuse of a minor to the production of obscene visual depictions of minors being sexually exploited.

Since PSC began, federal prosecutors have obtained life sentences in at least 64 PSC prosecutions. More importantly, from the launch of PSC through January 2011, more than 3,500 children depicted in child pornography have been identified through enhanced law enforcement coordination, multi-jurisdictional collaborative efforts, and additional contributions by NCMEC.

While PSC represented a leap forward in our efforts to combat child pornography crimes, the Department has been adapting to the evolution of these serious offenses long before PSC was established. For instance, in 2002, CEOS developed the High Technology Investigative Unit (HTIU), the first ever forensic unit co-located in a federal prosecutorial office. Today, CEOS consists of approximately twenty attorneys and six computer forensic specialists in the HTIU. The synergy resulting from having specialized prosecutors and computer forensic specialists working together on a daily basis considerably enhances the Department's capacity to prosecute cutting-edge, technologically complex child exploitation crimes, to train AUSAs and investigators across the country on digital evidence analysis, and to develop protocols and policy designed to improve the effectiveness and efficiency of investigations and digital evidence analysis nationwide.

CEOS has advanced the goals of PSC by investigating and prosecuting the most challenging child sexual exploitation cases with law enforcement agencies and United States Attorney's Offices around the country. For example, CEOS has partnered with the FBI, ICE, and USPIS, to develop and coordinate more than 20 nationwide investigations targeting the production, distribution, receipt, and possession of child pornography by more than 13,000

individuals residing in the United States. These national investigations resulted in hundreds of cases prosecuted by United States Attorney's Offices throughout the nation, often in conjunction with CEOS trial attorneys and HTIU computer forensic specialists.

Many of these investigations are global in scope. To provide a recent example, in Operation Delego, CEOS and the Department of Homeland Security helped identify a global child pornography network and facilitate the arrest of offenders in 13 countries on five continents. Several other major international investigations – such as Operation Joint Hammer, Operation Achilles, Operation Lost Boy, and Operation Nest Egg – have successfully dismantled multiple international child pornography organizations. In doing so, the Department of Justice has coordinated efforts with international law enforcement agencies such as Interpol, Europol, and Eurojust, the judicial cooperation arm of the European Union, to ensure that every available resource is used effectively. These alliances also ensure that child pornography distributors, collectors, and producers around the world are identified, stopped, and held accountable for their actions.

In August 2010, the Department released the first-ever National Strategy for Child Exploitation Prevention and Interdiction in order to formalize key partnerships, streamline prevention and prosecution, improve regional and interagency collaboration, and efficiently utilize all available resources. The National Strategy recognizes that while we must fight child exploitation with all the tools at our disposal, the investigation and prosecution of offenders will always play a key role in addressing the threat that child pornography offenses pose to our children. Accordingly, the Department will continue to place a priority on investigating and prosecuting this crime, together with all of our National Strategy partners. We believe that the

National Strategy will result in a continued increase in the number of child pornography cases that are investigated and then prosecuted in the federal system.

### **Challenges Remain**

Despite the success of Project Safe Childhood and the promise of the National Strategy, persistent challenges remain. In particular, in recent years one issue in child pornography cases has probably received more attention than any other: what constitutes an appropriate sentence for those who distribute, receive, and possess child pornography.

Those of us who are witness to these crimes through investigation and prosecution believe that the evidence suggests that many of these offenders are quite dangerous and that their crimes merit appropriate sentences. We understand, however, that in the absence of clear evidentiary support, it may be difficult for courts to determine what would be appropriate sentences for these crimes. A guideline that better calibrates the seriousness of an offender's conduct will aid the courts by helping to ensure they receive adequate information to understand the dangerousness of child pornography offenders and the severity of their offenses and to craft appropriate sentences that distinguish among offenders in child pornography distribution, receipt, and possession cases.

Today, we want to focus on how a recalibration of U.S.S.G. § 2G2.2, the sentencing guideline for child pornography distribution, receipt, and possession offenses, could lead to a better sentencing structure in these cases.

As you know, many cases prosecuted in the federal system were developed through peer-to-peer (P2P) investigations, particularly investigations involving the P2P program called Limewire. This software is easy to use by offenders who traffick in child pornography, and many offenders use it to commit these crimes. P2P investigations are common because it is

relatively simple for investigators to use software designed to find images of child pornography on the Limewire network and identify the individual offering it for download to other Limewire users. These programs are in wide use by the Internet Crimes Against Children Task Forces and other state and local law enforcement agencies because the software finds and identifies offenders residing within their jurisdictions. Because the investigating officer obtains child pornography from the offender, the criminal act of distribution can be established with almost no digital evidence analysis of the offender's media. In many P2P cases the file names are so descriptive that they leave little doubt as to the nature of the material being distributed, received, and possessed by the defendant. As such, digital analysis of the computer evidence in these cases may be very narrow, focusing on extraction of child pornography images and just enough information to establish the identity and knowledge of the person who put them on the computer.

Therefore, sentencing courts may not have the full picture of the offenses committed by a defendant caught in a P2P-based investigation because it is possible to find evidence to satisfy the basic elements of the offense with a small outlay of resources; accordingly, these investigations sometimes stop there and do not fully develop evidence that may be helpful in assessing the defendant's risk to society and the seriousness of his conduct. Digital evidence probative of motive and purpose, or more extensive criminal conduct, is not always sought by analysts or fully presented by prosecutors to the court. A lack of salient evidence like this may become a critical impediment to an appropriate sentence.

### **U.S.S.G. § 2G2.2**

We believe the sentencing guideline, U.S.S.G. § 2G2.2, poses some challenges to the successful handling and sentencing of child pornography cases. This guideline has existed in its current version more or less since 2003. Whether or not in 2003 it accurately calibrated the

seriousness of the offenders, our experience today tells us two things: first, the guideline has not kept pace with technological advancements in both computer media and internet and software technologies; and second, there is a range of aggravating conduct that we see today that is not captured in the current guideline. As a result, prosecutors, probation officers, and judges are often assessing these cases using a guideline that does not account for the full range of the defendant's conduct and also does not adequately differentiate among offenders given the severity of their conduct.

As a lingering habit from the era when the sentencing guidelines were mandatory, § 2G2.2 has become a de facto checklist for digital evidence analysis. A digital evidence analyst will look for sufficient evidence to establish a factual basis for a plea and to trigger application of the enumerated specific offense characteristics. Once those criteria are satisfied, there may be no clear benefit under the guidelines to search for additional evidence, and therefore no incentive for the analyst to keep looking for it. The evidence the prosecutor and the court will receive is thus often keyed to the guideline, which as written does not fully capture the nature of the crimes it covers.

This is especially so when you consider how heavily the guideline is focused on images. Of the seven specific offense characteristics, three pertain exclusively to the nature or number of images: whether the images depict prepubescent children or sadistic or masochistic conduct, and the number of images. This is not to suggest that the image enhancements are without merit. To the contrary, we believe they are meaningful indicators of the seriousness of the offense, as an offender who has collected more images has had a greater impact on the market for child pornography, and an offender who collects images of prepubescent children or sadistic and masochistic images has signaled to the market that there is demand for such material – a demand



that can only be met by the sexual abuse of children to produce more images. (Having said that, the image quantity scale, with its maximum of 600 images, no longer adequately differentiates among offenders when many defendants have well over that number and some have hundreds of thousands.) Rather, our point is that the guidelines are worth examining in light of technological advances and patterns among offenders to determine whether the overall emphasis on the content and number of the images comes at the expense of other criteria that can measure the degree of an offender's conduct. This is because the remaining four specific offense characteristics—the nature of distribution or lack of intent to distribute, the use of a computer, and engaging in a pattern of child exploitation—on their own do not capture the full range of an offender's criminal conduct. Because of the way the guideline is used as a tool not just during sentencing, but during the predicate investigation, it creates a cycle which keeps investigators, prosecutors, probation officers, and judges from getting the information they need to have a full picture of the defendant's crime.

The case of *United States versus Robert Paul Merz*, prosecuted in the Eastern District of Pennsylvania, illustrates what can be missed under the current guideline. Like many defendants charged with federal child pornography offenses, Merz used peer-to-peer software (in his case, a program called eMule) to collect child pornography. Also like many such defendants, Merz was originally charged with receipt and possession of child pornography. Investigators had seized two computers, 107 DVDs, and 82 CDs, which collectively contained 450 gigabytes of images and videos of child pornography. A digital evidence analysis quickly found evidence that triggered each of the specific offense characteristics: the defendant had over 600 images of child pornography, had images of prepubescent children, had images of children engaged in sadistic or

masochistic conduct, used a computer, and engaged in distribution. In this case, the pattern enhancement also applied as the defendant had prior convictions for child molestation.

At that point, the investigation could have concluded, as there were no more enhancements which could apply. However, had the investigation stopped there, investigators, prosecutors, and the court would have missed significant additional criminal behavior. Further analysis revealed that Merz was the administrator of a tightly controlled, members-only online global forum where members could trade and discuss child pornography and child sexual abuse. Individuals could join the forum only if invited by Merz. The defendant also established the rules for the forum, which included this statement of purpose: “This forum is for nudes and non nude pictures, galleries, and videos of children, between the ages of 0-17, both females and males. This means, I don’t want to see no [sic] older [than] 17 on this board, if I do, I will delete that post. So, no grannies!!!” The defendant clearly articulated that in order to remain a member of the board, members had to contribute content: “we can gather some great stuff if you are willing to post. However, for the ones that don’t post, you will not last long ... I only ask the best of the best. Some already are here as probationary members, and I asked them to perform certain things. If they don’t honor those thing[s] I requested, they will soon find themselves gone from the forum.” Content was posted on the forum under various topic headings, which included such graphic descriptions as “04yo Venezuela Girl (She does it ALL)” and “A damn good blowjob.” Finally, the defendant also imposed a number of security measures that members had to follow in order to avoid being identified and exposed. In short, Merz was personally engineering the ongoing commission of child pornography offenses, creating the forum, ensuring it could operate securely, handpicking and controlling the membership, setting the rules, and requiring the members contribute child pornography to the collection, all of which

was designed to create a safe community where offenders could bond over their shared and unabashed interest in the sexual abuse of children. And yet, § 2G2.2 captures absolutely none of this serious aggravating conduct.

This goes beyond a mere sentencing issue. There were two significant consequences as a result of the additional investigation of Merz. First, prosecutors obtained a superseding indictment which added a charge of advertising child pornography. Because of the defendant's prior convictions, this increased his sentencing exposure to thirty-five years to life (and in fact, following his conviction, the defendant was sentenced to life in prison). Second, the investigation led to the identification of additional offenders and, more importantly, the rescue and recovery of children who were being sexually abused. This is not to place blame solely on the guideline for what could have been missed in the Merz case. What the Merz case does illustrate, however, is how much significant information the existing guideline can miss. It also shows that cases that begin with an investigation into P2P file sharing conduct can reveal offenders who pose a serious risk to society.

### **Considerations For The Way Forward**

By highlighting these issues, we do not mean to suggest that there is no information available to us to help illuminate what factors are relevant to gauge the seriousness of an offender's crime. To the contrary, over the last ten years, we have learned a great deal about the types of offenders out there and how they differ by degree in the harm they cause and the danger they pose.

In our experience, child pornography offenders use internet technologies to do four basic things: collect and trade images and videos of child pornography, produce and share child pornography, communicate with other offenders, and communicate with victims. Some

offenders use internet technologies in all four ways, others use the internet for more limited purposes. Often, offenders' use of the internet will evolve over time until their life becomes defined by their online sexual exploitation of children. But understanding the different internet technologies that can be used by an offender, and more importantly, how different internet technologies offer different experiences and how those differences can result in more dangerous behavior by offenders, is critical to understanding the full range of the possible severity of offenders' conduct.

Offenders' experience in committing child pornography offenses varies according to the technologies they have used because internet technologies differ in the extent and degree of social interaction they provide. As will be explored in more depth below, some offenders download child pornography using P2P technology or from a website (which typically do not allow users to connect and communicate with each other), others communicate on a one-on-one basis with other offenders using instant messaging or hybrid P2P technologies, while yet others use social networking to participate in private online communities devoted to the sexual exploitation of children. Our experience tells us that the variety and kind of technology used by an offender can provide insight into the kind of risk that offender poses to society. This is so because experts tell us that offenders who network with others who share their sexual interest in children are likely to engage in communication and behavior that reinforces the beliefs they use to support their sexual exploitation of children. This process of normalizing deviant behavior can lead to escalation of offending. Our experience with offenders such as Merz tells us that an offender who may actually appear to be a lower level offender because he was caught engaging in conduct associated with less sophisticated offenders may actually be engaging in far more

extensive and serious conduct which, if discovered and presented to the court, could result in a more severe sentence that accounts for the heightened risk posed by such an offender.

To elaborate on this point, some offenders appear to act largely alone without social interaction with other offenders. This offender, who may access child pornography through peer-to-peer programs or commercial web sites, is primarily involved in the acquisition of images for himself only, and possibly anonymous sharing with others. He does not communicate with anyone else about child pornography or his sexual interest in children, and so does not receive any external reinforcement of his criminal actions, other than the behavioral reinforcement he gets from the gratification he receives in consuming these images of child sexual abuse.

This lack of social interaction with others of like mind, however, is not meant to suggest that these offenders do not pose a serious risk. Offenders who distribute child pornography via P2P programs pose a unique danger to the community because distribution through such networks is both far-reaching and indiscriminate. P2P networks reach into countless homes around the world, and the child pornography made available on P2P networks can be obtained by anyone, including children. Beyond that, even if a collector of sexually abusive images of children never himself molested children, he still directly contributed to the sexual abuse of children and merits appropriate punishment. The Supreme Court long ago noted that the heart of a child pornography case is the endless sexual exploitation of a child through the ongoing mass circulation of images of their abuse. *New York v. Ferber*, 458 U.S. 747, 758 (1982) (“[T]he use of children as subjects of pornographic materials is harmful to the physiological, emotional, and mental health of the child.”).

In the words of one victim who was repeatedly bound and raped by her father for two years, starting when she was ten:

thinking about all those sick perverts viewing my body being ravished and hurt like that makes me feel like I was raped by each and every one of them. I was so young. . . . It terrifies me that people enjoy viewing things like this. . . . Each person who has found enjoyment in these sick images needs to be brought to justice . . . even though I don't know them, they are hurting me still. They have exploited me in the most horrible way.

The Supreme Court also observed that perhaps the only practical way to stop the production of child pornography is to give severe sentences to child pornography offenders, the individuals who stimulate the demand for a constant stream of new images that can only be produced by sexually abusing a child. *Ferber*, 458 U.S. at 760. All individuals who possess child pornography thus deserve appropriate punishment.

Other offenders are engaged in a one-on-one experience with other offenders, through the use of such technologies as mail, email, newsgroups, GigaTribe, and internet relay chat. This offender is not only seeking and obtaining images of child sexual abuse, but also engages other individuals in discussion about child sexual abuse. Through this connection to another like-minded individual, the shame and fear that an individual might have felt that inhibited him from pursuing his pedophilic interest begins to erode. Because these technologies include a means of communication, offenders can, for the first time, truly request and seek specific content, whether it be material depicting a particular age or sex of the victim or a particular sex act. This kind of offender might be more emboldened to pursue his crimes because of the validation he receives from his connection with an individual who corroborates his desires. He could also be driving others to commit sexual crimes against children by participating in this kind of social networking.

Finally, we see offenders who join a broader community of individuals interested in the sexual abuse of children, who might use web-based forums or bulletin boards, email groups, social networking websites, or internet relay chat, to self-reinforce their distorted view of children as sexual objects. They push each other to new limits, whether by demanding an individual add new material for circulation among the group or by explicitly encouraging an offender to molest a child. Many of the offenders in such communities are molesting children and documenting the abuse in videos or images.

Forums with large memberships dedicated to the sexual abuse of children and the exchange of its graphic imagery are becoming ubiquitous on the internet. In all of these groups, we consistently find certain common characteristics: the sites constitute a thriving marketplace for the exchange of child pornography; they are hierarchical and members' upward progression within the site's hierarchy is achieved most readily by producing child pornography and distributing it to other members; and communication between members typically normalizes, encourages, and facilitates the sexual abuse of children. The individuals who belong to these groups pose a particularly grave risk to children.

These offenders may also be marked by the more sophisticated measures they take to avoid detection by law enforcement. For example, they may take advantage of certain technologies, such as encryption, to conceal their crimes. Or they may adopt certain protocols, such as the use of aliases and code words, to cover their tracks.

This kind of offender is well illustrated by Operation Achilles, an international investigation that led to the conviction of fourteen individuals in the United States in the first-ever case brought under the child exploitation enterprise statute. Seven defendants pleaded guilty before trial, and seven were convicted by a jury at trial. Operation Achilles targeted a

highly sophisticated online enterprise that used newsgroups to trade over 400,000 images of child pornography. The group's operation was tremendously sophisticated, with complex encryption, identity anonymizers, other technical protections, and strict rules of procedure to avoid detection. In addition to the trading of over 400,000 child abuse images between the group members, some of whom boasted collections in excess of one million images, the group contracted for and facilitated the sexual abuse of children, including very young children, in order to generate new child pornographic images for the group. The enterprise also established an account, funded by the members, in order to purchase newly released child pornography material from various international producers. Group members (approximately 60) were located across the globe. Of those, approximately 22 members were identified, including the 14 defendants convicted in the United States. At the time in 2008, this case involved one of the largest digital seizures in the history of the FBI (58 terabytes) and required highly-sophisticated technological skills to overcome the complex encryption and other technological challenges.

As a result of this investigation, nine child victims were identified. Of the 14 U.S. defendants, at least 5 of them were active molesters. Three of those had prior convictions for the sexual molestation of children and had served prison sentences. All of the defendants convicted at trial received life sentences, while sentences for the defendants who pled guilty before trial ranged from 164 (for a cooperating defendant) to 365 months in prison.

Comparing what we have learned from cases such as Operation Achilles to the characteristics described in the current guideline suggests that the Commission should consider whether § 2G2.2's existing specific offense characteristics should be revised and consolidated to bring them in line with today's reality, and whether new specific offense characteristics should



be added to better differentiate among offenders based on their offense severity and risk to children.

There are several characteristics that could be taken into account in a revised guideline. The Commission could add a provision that addresses the harm caused by distribution such as that by P2P technologies. The Commission could also consider adding specific offense characteristics for image severity that address images of bestiality as well as images of infants and toddlers. As for the enhancement for the quantity of images, the image table might be revised to reflect the plain reality that offenders today can amass collections, not of hundreds of images, but tens, or even hundreds, of thousands of images.

The Commission could consider adding new specific offense characteristics to better differentiate among offenders, such as by accounting for offenders who communicate with one another and in so doing, facilitate and encourage the sexual abuse of children and production of more child pornography, as well as for offenders who create and administer the forums where such communication is taking place. The Commission could also consider a specific offense characteristic that addresses the length of time the offender has committed the offense to distinguish those offenders who have gotten away with their crime for years from those who may have just begun committing these crimes. The Commission could also consider recognizing variations in the sophistication of the criminal conduct to appropriately address the more technologically sophisticated offenders who might use multiple internet technologies to collect child pornography, or who might use sophisticated measures to avoid being detected by law enforcement, or who are members of a group dedicated to child sexual exploitation. By considering these types of changes, the Commission could improve § 2G2.2's ability to

meaningfully differentiate among offenders based on the severity of their offense conduct and the risk they pose to children.

## **Conclusion**

Six months ago, the Attorney General announced that indictments had been obtained as part of Operation Delego. This operation targeted hundreds of individuals, in countries around the world, for their alleged participation in “Dreamboard” – a private, members-only online bulletin board that was created and operated to promote pedophilia, and to encourage the sexual abuse of very young children. Utilizing sophisticated techniques in an attempt to avoid law enforcement detection, Dreamboard’s members allegedly traded graphic images and videos of adults molesting young children – often violently; and created a massive private library of images of child sexual abuse.

According to the indictments, in order to become part of the Dreamboard community, prospective members were required to upload pornography portraying children 12 years old or younger; once given access, participants had to continually upload images of child sexual abuse in order to maintain membership; the more content they provided, the more content they could access; and members who created and shared images and videos of themselves molesting children received elevated status – and greater access. Some of the children featured in these images and videos were just infants. And, in many cases, the children being victimized were in obvious, and intentional, pain – even “in distress and crying,” just as the rules for one area of the bulletin board mandated. Dreamboard’s creators and members lived all over the world – but they allegedly were united by a disturbing belief that the sexual abuse of children is proper conduct that should not be criminalized; and some even referred to their own creation, dissemination, and collection of child pornography as a “hobby.”

Dreamboard is the latest in a line of cases which illuminate how serious child pornography offenders can be, and the extent, sophistication, and depth of their criminal conduct. We look forward to working with you to assess the extent to which the guidelines capture the seriousness of this conduct, and to exploring how U.S.S.G. § 2G2.2 might better reflect the range of conduct we see today.