

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	No. 06 CR 33
)	
v.)	
)	
BRIAN A. ANNORENO,)	Violations: Title 18,
also known as "Acidburn,")	United States Code,
GREGORY J. SWEEZER,)	Sections 371, 2251(a), 2252A(a)(1),
also known as "Behrplus_925,")	2252A(a)(2)(A), and 2252A(a)(5)(B)
LISA A. WINEBRENNER,)	
also known as "HumbleDuchess")	

COUNT ONE

The SPECIAL FEBRUARY 2005-1 GRAND JURY charges:

1. At times material to the indictment:

a. "Kiddypics & Kiddyvids" was the name of an Internet chat room that existed for the purpose of facilitating the trading of child pornography.

b. The "Kiddypics & Kiddyvids" chat room (hereinafter "the chat room") was hosted on the Internet through the software program WinMX. The WinMX program provided to individuals who entered the chat room the ability to engage in online conversations, or "chats." Although participants could enter the chat room from computers in locations around the world, all chat communications traveled through one "host" computer.

c. The WinMX program also allowed for "peer-to-peer" file sharing, by which individuals participating in the chat room could select files from their personal computers and make those files available for other individuals in the chat room to directly download. Individuals in the chat room could use the "peer-to-peer" aspect of the WinMX program to make available to other members of the chat room selected visual image files.

d. Individuals communicating in the chat room chose “screen names” upon entering the chat room. When an individual posted a message in the chat room, the individual’s screen name would precede the posted message.

e. The following individuals, using the following screen names and accessing the chat room from the following locations, participated in the chat room through chats and the sharing of files:

1. “G.O.D.,” located in Clarksville, Tennessee;
2. “Acidburn,” located in Bartlett, Illinois;
3. “Big_Daddy619,” located in Edmonton, Alberta, Canada;
4. “ax9572,” located in London, England;
5. “Entity,” located in Manchester, England;
6. “Yyydbh5182,” located in North Aurora, Illinois;
7. “Behrplus_925,” located in Aurora, Illinois;
8. “Darkhorse,” located in Kalamazoo, Michigan;
9. “Wharfrat,” located in Reno, Nevada;
10. “CuLeX,” located in Milton, Florida;
11. “A_School_Teacher,” located in Oakfield, New York;
12. “Lord_Newbie,” located in Charlotte, North Carolina;
13. “Alex1,” located in Sebring, Florida;
14. “Nemo,” located in Phoenix, Arizona;
15. “BlueDragon,” located in Ash Grove, Queensland, Australia;
16. “Sir_CP,” located in Victoria, Australia;

17. "DarcBiocode," located in Stafford, Queensland, Australia;
18. "LoneWolf_95," located in Brandon, Manitoba, Canada;
19. "Honry40Babe," located in Kingston, Ontario, Canada;
20. "Lumberjack," located in Woodbridge, Ontario, Canada;
21. "10_boy_canada," located in Selkirk, Manitoba, Canada;
22. "Fydei," located in Longueuil, Quebec, Canada;
23. "Msg4Homemade," located in Courtenay, British Columbia, Canada;
24. "LordVader," located in Prince George, British Columbia, Canada;
25. "Msg2Trade," located in Toronto, Ontario, Canada;
26. "HumbleDuchess," located in Osceola, Iowa; and
27. "Geograns," located in Kapolei, Hawaii.

f. The chat room was maintained by a "host" individual and various "administrators" selected by the "host." The WinMX program provided the "host" and "administrators" special privileges in administering the room, including the ability to block certain users from entering or communicating in the chat room, as well as the ability to post in the chat room messages that only the "host" and "administrators" and other selected individuals could see. Using the WinMX software program, the host and administrators were able to establish rules for membership in the chat room and could determine which individuals were allowed to participate in the chat room.

g. The user with the screen name "G.O.D." was the primary host of the chat room, although others also at times hosted the chat room. For instance, on or about March 8, 2006, shortly after the user with the screen name "G.O.D." had been arrested, defendant WINEBRENNER

became the host of the chat room. Administrators included defendant WINEBRENNER and members using the screen names “CuLeX,” “Wharfrat,” “Lord Newbie,” “BlueDragon,” “Sir_CP,” “Fydei,” “DarcBiocode,” and others.

2. Beginning at a time unknown, but not later than in or about April 2005, and continuing thereafter up to and including on or about March 10, 2006, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRIAN ANNORENO,
also known as “Acidburn,”
GREGORY J. SWEEZER,
also known as “Behrplus_925,” and
LISA A. WINEBRENNER,
also known as “HumbleDuchess,”

defendants herein, did knowingly conspire and agree with each other and with others known and unknown to the Grand Jury, including participants in the “Kiddypics & Kiddyvids” chat room, to commit offenses against the United States, that is:

- a. The knowing receipt and attempted receipt of images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which images had been mailed, shipped, and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2252A(a)(2)(A);
- b. The knowing transportation and shipment in interstate commerce of 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);
- c. The knowing publication of a notice and advertisement seeking and offering to receive, exchange, produce, display, distribute, and reproduce a visual

depiction, the production of which visual depiction involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct, in violation of Title 18, United States Code, Section 2251(d)(1)(A); and,

- d. The knowing possession and attempted possession of material which contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which images had been mailed, shipped, and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

3. It was part of the conspiracy that defendants and their co-conspirators agreed to use and did use the “Kiddypics & Kiddyvids” chat room to facilitate the trading of images of child pornography with one another, by making available to members of the chat room information about obtaining and viewing child pornography, as well as making available child pornography images for downloading by chat room participants.

4. It was further part of the conspiracy that the hosts and administrators of the chat room, including defendant WINEBRENNER, engaged in the following activities, among others, to facilitate the operation of the chat room:

- a. They held private online meetings to discuss the operation of the chat room and exchanged other private communications within the chat room that were visible only to the hosts and administrators;

b. They created a contingency plan for continued operation of the chat room if the host were to become unable to host the chat room. The contingency plan provided for control of the chat room to be transferred to a new host; and

c. They created “rules” for participation in the chat room, and prohibited from participating in the chat room individuals who violated the rules for participation, or who were believed to be law enforcement officers.

5. It was further part of the conspiracy that defendants and their co-conspirators agreed to make available and did make available to other participants in the chat room images of child pornography. By designating on their own computers images that they wished to share with other participants in the room, defendants and their co-conspirators agreed to make and did make child pornographic images available for direct download over the Internet through the chat room, and also through online communication tools such as Yahoo! and MSN Instant Messenger.

6. It was further part of the conspiracy that defendants and their co-conspirators agreed to receive and did receive from participants in the chat room images of child pornography. Defendants and their co-conspirators were able to receive such child pornographic images by downloading images that members of the chat room had made available for direct download through the chat room, as well as through online communication tools such as Yahoo! Instant Messenger and MSN Instant Messenger.

7. It was further part of the conspiracy that defendant ANNORENO and other co-conspirators agreed to use and did use minors to produce images of child pornography for the purpose of making those child pornographic images available to other members of the chat room, including by means of streaming videos of live molestations.

8. It was further part of the conspiracy that participants in the chat room agreed to use certain security measures in order to conceal their activities, communications, child pornography collections, and identities from law enforcement, and provided information to one another about suspected law enforcement activities, in order to conceal their illegal activities from law enforcement. The security measures undertaken in support of the conspiracy included the following:

a. Administrators of the chat room carefully screened persons present in the chat room for the purpose of ensuring that those in the chat room would not interfere with the objects of the conspiracy and were not affiliated with law enforcement;

b. Administrators “kicked,” or removed, from the chat room and prevented from accessing the chat room, individuals suspected of being affiliated with law enforcement;

c. Administrators created a rule that participants in the chat room not provide or solicit any personal identifying information from one another, and participants in fact followed this rule;

d. Defendants and their co-conspirators conducted some of their exchanges of child pornography outside of the chat room, through private communications, such as the live molestation video exchanges between defendant ANNORENO and the user with the screen name “Big_Daddy619,” which occurred through MSN Instant Messenger and Yahoo! Instant ;

e. The host and participants in the chat room discussed the use of encryption and data-destruction or data-overwriting software to protect stored child pornographic files from discovery by law enforcement; and

f. Participants in the chat room discussed hiding, and did hide, their child pornographic images in locations unlikely to be detected by law enforcement, including an mp3 player and remote “off-site” storage locations that could be accessed by the Internet.

The Defendants’ Conduct in the Chat Room

9. It was further part of the conspiracy that defendant BRIAN A. ANNORENO began accessing the “Kiddypics & Kiddyvids” chat room in or about April 2005, and his membership in the conspiracy continued until his arrest on or about January 8, 2006. While participating in the chat room, defendant ANNORENO used the screenname “Acidburn” and accessed the chat room from a location in or near Bartlett, Illinois. Defendant ANNORENO used the chat room to facilitate his production, distribution, receipt, and possession of images of child pornography as well as to make advertisements seeking and offering to receive, exchange, produce, display, and distribute images of child pornography.

10. It was further part of the conspiracy that defendant GREGORY J. SWEEZER, a resident of Aurora, Illinois, began accessing the “Kiddypics & Kiddyvids” chat room not later than in or about October 2005. While participating in the chat room, defendant SWEEZER used the screen name “Behrplus_925” and accessed the chat room from within the Northern District of Illinois. SWEEZER used the chat room to facilitate his distribution, receipt, and possession of images of child pornography, as well as to make advertisements seeking and offering to receive, exchange, produce, display, and distribute images of child pornography.

11. It was further part of the conspiracy that defendant LISA A. WINEBRENNER began accessing the “Kiddypics & Kiddyvids” chat room no later than in or about January 2005. While participating in the chat room, defendant WINEBRENNER used the screen name “HumbleDuchess”

and accessed the chat room from a location in or near Osceola, Iowa. WINEBRENNER used the chat room to to facilitate her distribution, receipt, and possession of images of child pornography, as well as to make advertisements seeking and offering to receive, exchange, produce, display, and distribute images of child pornography.

OVERT ACTS

12. In furtherance of the conspiracy and to accomplish its unlawful objectives, the defendants and their co-conspirators committed and caused to be committed the following overt acts, in the Northern District of Illinois, Eastern Division, and elsewhere:

a. In or about April 2005, defendant ANNORENO used Minor A, an infant child, to produce visual images of child pornography, namely, a video of defendant ANNORENO molesting Minor A and performing oral sex on Minor A. As defendant ANNORENO was producing the child pornographic video, he was transmitting it live, via the Internet, to another participant in the chat room, namely a co-conspirator using the screen name "Big_Daddy619."

b. In or about April 2005, a co-conspirator using the screen name "Big_Daddy619" used Minors B, C, D, and E, children under the age of 12, to produce visual images of child pornography, namely, videos of "Big_Daddy619" molesting and engaging in sexual activity with Minors B, C, D, and E. As "Big_Daddy619" produced the child pornographic videos, he transmitted the videos live, via the Internet, to other participants in the chat room, including defendant ANNORENO, who received the images.

c. In or about October 2005, defendant ANNORENO used Minor A to produce a visual image of child pornography, namely, an image entitled, "Dscn0800.jpg," in which Minor

A's genitals were lasciviously displayed. Defendant ANNORENO then provided that child pornographic image to a co-conspirator using the screen name "Yyydbh5182."

d. On or about February 11, 2006, defendant SWEEZER distributed to an individual whom he believed to be a participant in the chat room, but who in fact was an undercover law enforcement officer, two video images of child pornography. The two video images of child pornography were entitled "Nice_s4.mpg" and "kp_daddy cum in chils hands (really short). Mpg." Both videos depicted a minor female under the age of 12 engaging in a sexual act with an adult male.

e. Between in or about September 2005 and on or about March 10, 2005, defendant WINEBRENNER knowingly received a video image of child pornography, which image she downloaded through the chat room.

f. On or about March 8, 2006, defendant WINEBRENNER became the host of the chat room and assumed responsibility for maintaining the accessibility of the chat room for its members.

g. On or about March 9, 2006, defendant WINEBRENNER destroyed evidence of her possession of child pornographic images on her computer by running the software program Evidence Eliminator.

h. On or about March 10, 2006, while acting as the host of the chat room, defendant WINEBRENNER discussed with the administrators of the chat room, through online communications in the chat room, her recent destruction of her child pornographic images and the need for others to destroy any such images and to exercise caution in their downloading of child pornography.

i. On or about March 10, 2006, while acting as the host of the chat room, defendant WINEBRENNER discussed with the administrators of the chat room, through online communications in the chat room, a contingency plan for the continuation of the chat room in the event that she were to be arrested.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

The SPECIAL FEBRUARY 2005-1 GRAND JURY further charges:

In or about April 2005, at Bartlett, in the Northern District of Illinois, Eastern Division,

BRIAN ANNORENO,
also known as "Acidburn,"

defendant herein, employed and used a minor under the age of eighteen with the intent that the minor engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, namely, a live streaming video of defendant ANNORENO molesting Minor A and performing oral sex on Minor A, which visual depiction was produced using materials that had been shipped and transported in interstate and foreign commerce;

In violation of Title 18, United States Code, Section 2251(a).

COUNT THREE

The SPECIAL FEBRUARY 2005-1 GRAND JURY further charges:

In or about October 2005, at Bartlett, in the Northern District of Illinois, Eastern Division,

BRIAN ANNORENO,
also known as "Acidburn,"

defendant herein, employed and used a minor under the age of eighteen with the intent that the minor engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, specifically, an image entitled "Dscn0800.jpg," which visual depiction was produced using materials that had been shipped and transported in interstate and foreign commerce;

In violation of Title 18, United States Code, Section 2251(a).

COUNT FOUR

The SPECIAL FEBRUARY 2005-1 GRAND JURY further charges:

In or about October 2005, at Bartlett, in the Northern District of Illinois, Eastern Division,

BRIAN ANNORENO,
also known as "Acidburn,"

defendant herein, knowingly transported and shipped child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely a file entitled "Dscn0800.jpg," in interstate commerce, by computer;

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

COUNT FIVE

The SPECIAL FEBRUARY 2005-1 GRAND JURY further charges:

On or about February 6, 2006, at Aurora, in the Northern District of Illinois, Eastern Division,

GREGORY J. SWEEZER,
also known as "Behrplus_925,"

defendant herein, knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely, a computer file titled "7 yo girl-bound finger fucked by Daddy.mpg," which file had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT SIX

The SPECIAL FEBRUARY 2005-1 GRAND JURY further charges:

In or about February 11, 2006, at Aurora, in the Northern District of Illinois, Eastern Division,

GREGORY J. SWEEZER,
also known as "Behrplus_925,"

defendant herein, knowingly transported and shipped child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely two videos entitled "Nice_s4.mpg" and "kp_daddy cum in chils hands (really short). Mpg," in interstate commerce, by computer;

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

COUNT SEVEN

The SPECIAL FEBRUARY 2005-1 GRAND JURY further charges:

In or about March 9, 2006, at Aurora, in the Northern District of Illinois, Eastern Division,

GREGORY J. SWEEZER,
also known as "Behrplus_925,"

defendant herein, knowingly possessed material, namely, a computer hard drive, that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), such images having been produced using materials that had been shipped and transported in interstate commerce by any means;

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATIONS

The SPECIAL FEBRUARY 2005-1 GRAND JURY further charges:

1. The allegations contained in Counts One through Seven of this Indictment are realleged and incorporated by reference as if fully restated here for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253.

2. As a result of their violations of Title 18, United States Code, Sections 2251 and 2252A(a)(1),

BRIAN ANNORENO,
also known as "Acidburn,"
GREGORY J. SWEEZER,
also known as "Behrplus_925," and
LISA A. WINEBRENNER,
also known as "HumbleDuchess,"

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all right, title, and interest defendants have in 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 violations.

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section 2253 include, but are not limited to, computers seized from the defendants' residences at the time of defendants' arrests.

4. To the extent that the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred to, sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value, or

(e) has been commingled with other property that cannot be subdivided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 18, United States Code, Section 2253(o).

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY