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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

EARNEST AKINDELE TEAMER,

aka "Scooby,"
aka "Splash,"
aka "Water Splash,"
aka "SPLASH CiTyBoi,"
aka "\$koobystacks,"

Defendant.

ED CR No. 5:23-cr-00130-SB

I N D I C T M E N T

[18 U.S.C. § 2423(a):
Transportation of a Minor with
Intent to Engage in Criminal
Sexual Activity; 18 U.S.C.
§§ 2251(a), (e): Production of
Child Pornography; 18 U.S.C.
§§ 2252A(a)(2)(A), (b)(1): Receipt
and Distribution of Child
Pornography]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 2423(a)]

Beginning on or about October 9, 2021, and continuing to on or
about December 4, 2021, in San Bernardino County, within the Central
District of California, and elsewhere, defendant EARNEST AKINDELE
TEAMER, also known as ("aka") "Scooby," aka "Splash," aka "Water
Splash," aka "SPLASH CiTyBoi," aka "\$koobystacks," knowingly
transported an individual, who had not attained the age of 18 years,
in interstate and foreign commerce, with the intent that such

1 individual engage in sexual activity for which any person can be
2 charged with a criminal offense.

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COUNT TWO

[18 U.S.C. §§ 2251(a), (e)]

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3 On or about December 27, 2022, in San Bernardino County, within
4 the Central District of California, defendant EARNEST AKINDELE
5 TEAMER, also known as ("aka") "Scooby," aka "Splash," aka "Water
6 Splash," aka "SPLASH CiTyBoi," aka "\$koobystacks," knowingly
7 employed, used, persuaded, induced, enticed, and coerced a minor
8 girl, who had not attained 18 years of age, to engage in sexually
9 explicit conduct, as defined in Title 18, United States Code, Section
10 2256(2) (A), for the purpose of producing a visual depiction of such
11 conduct, namely, a video depicting defendant TEAMER manipulating the
12 buttocks of the minor girl, then a 15-year-old child, with his penis
13 and placing his penis into the mouth of the minor girl, knowing and
14 having reason to know that such visual depiction would be transported
15 and transmitted using any means and facility of interstate and
16 foreign commerce, and which visual depiction was produced and
17 transmitted using materials that had been mailed, shipped, and
18 transported in and affecting interstate and foreign commerce by any
19 means, including by cellular phone, and which visual depiction was
20 actually transported and transmitted using any means and facility of
21 interstate and foreign commerce and in and affecting interstate and
22 foreign commerce, including the Internet.

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COUNT THREE

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

On or about December 4, 2021, in San Bernardino County, within the Central District of California, defendant EARNEST AKINDELE TEAMER, also known as ("aka") "Scooby," aka "Splash," aka "Water Splash," aka "SPLASH CiTyBoi," aka "\$koobystacks," knowingly received on Snapchat account "earnie_teamer" child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce, and that had been mailed, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, knowing that the images were child pornography.

The child pornography that defendant TEAMER received on Snapchat Account "earnie_teamer" consisted of a video depicting TEAMER licking the anus and vagina of a child, who was under the age of 18 years old.

COUNT FOUR

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

On or about February 22, 2023, in San Bernardino County, within the Central District of California, defendant EARNEST AKINDELE TEAMER, also known as ("aka") "Scooby," aka "Splash," aka "Water Splash," aka "SPLASH CiTyBoi," aka "\$koobystacks," knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce, that had been mailed, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, knowing that the images were child pornography.

The child pornography that defendant TEAMER received via text message consisted of three images depicting a child, who was under the age of 18 years old, with a penis in her mouth.

COUNT FIVE

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

On or about February 26, 2023, in San Bernardino County, within the Central District of California, defendant EARNEST AKINDELE TEAMER, also known as ("aka") "Scooby," aka "Splash," aka "Water Splash," aka "SPLASH CiTyBoi," aka "\$koobystacks," knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce, that had been mailed, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, knowing that the images were child pornography.

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1 The child pornography that defendant TEAMER distributed
2 consisted of a video depicting TEAMER manipulating the buttocks of a
3 child and placing his penis into the mouth of a child, who was under
4 the age of 18 years old.

5
6 A TRUE BILL

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Foreperson

10 E. MARTIN ESTRADA
11 United States Attorney

12 
13 MACK E. JENKINS
14 Assistant United States Attorney
15 Chief, Criminal Division

16 SEAN D. PETERSON
17 Assistant United States Attorney
18 Chief, Riverside Branch Office

19 TRITIA L. YUEN
20 Assistant United States Attorney
21 Riverside Branch Office
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