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FILED CLERK, U.S. DISTRICT COURT 08/30/2023 CENTRAL DISTRICT OF CALIFORNIA DEPUTY

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2023 Grand Jury

ED CR No. 5:23-cr-00169-SPG

I N D I C T M E N T

[18 U.S.C. \S \$ 2251(a), (e): Production of Child Pornography; 18 U.S.C. $\S\S$ 2252A(a)(2), (b)(1): Receipt and Distribution of Child Pornography; 18 U.S.C. §§ 2252A(a)(5)(B), (b)(2): Possession of Child Pornography; 18 U.S.C. § 2253: Criminal Forfeiture]

The Grand Jury charges:

UNITED STATES OF AMERICA,

v.

aka "anon,"

MATTHEW DANIEL JOHNSON,

Plaintiff,

Defendant.

COUNTS ONE THROUGH ELEVEN

[18 U.S.C. \S \$ 2251(a), (e)]

On or about the following dates, in Riverside County, within the Central District of California, defendant MATTHEW DANIEL JOHNSON, also known as "anon," knowingly employed and used the following minors, who had not attained the age of 18 years, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2)(A), for the purpose of producing a visual depiction of such conduct, which visual depiction was

produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer:

| COUNT | DATE | MINOR VICTIM(S) |
|--------|--|--------------------------|
| ONE | On an unknown date between January 1, 2017 and March 4, 2020 | Minor Victim 1 |
| TWO | October 28, 2019 | Minor Victim 2 |
| THREE | October 29, 2019 | Minor Victim 3 |
| FOUR | November 21, 2019 | Minor Victim 4 |
| FIVE | December 11, 2019 | Minor Victim 5 |
| SIX | December 18, 2019 | Minor Victim 6 |
| SEVEN | January 13, 2020 | Minor Victim 2 |
| EIGHT | January 15, 2020 | Minor Victim 7 |
| NINE | January 15, 2020 | Minor Victims 8 and 9 |
| TEN | January 25, 2020 | Minor Victim 10 |
| ELEVEN | January 20, 2020 | Minor Victim 11 |

COUNT TWELVE

[18 U.S.C. \S \$ 2252A(a)(2), (b)(1)]

On or about November 20, 2019, in San Bernardino County, within the Central District of California, defendant MATTHEW DANIEL JOHNSON, also known as "anon," knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, and which had been mailed, and which had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, knowing that the videos were child pornography.

The child pornography that defendant JOHNSON distributed consisted of the following videos:

- 1. "[boy + man] Max 10yo boy and his uncle very hot.avi"; and
- 2. "Little Bondage part 1 10yo Boy and Men boy fuck extreme- Gay Pedo Pthc.avi".

COUNT THIRTEEN

[18 U.S.C. \S 2252A(a)(2), (b)(1)]

On or about March 1, 2020, in San Bernardino County, within the Central District of California, defendant MATTHEW DANIEL JOHNSON, also known as "anon," knowingly received, on a Toshiba laptop with Serial Number 9F164630C, child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, and which had been mailed, and which had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, knowing that the videos were child pornography.

The child pornography that defendant JOHNSON received consisted of the following videos:

1. "[boy+man] uncle babysit 10";

- 2. "man ass fucks 12yo boy cums in mouth.mp4"; and
- 3. "skype cute brit boy jizzy jizz on his body(boywankers).mp4".

COUNT FOURTEEN

[18 U.S.C. \S \$ 2252A(a)(5)(B), (b)(2)]

On or about March 4, 2020, in San Bernardino County, within the Central District of California, defendant MATTHEW DANIEL JOHNSON, also known as "anon," knowingly possessed a Toshiba laptop with Serial Number 9F164630C containing at least one image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), involving a prepubescent minor and a minor who had not attained 12 years of age, that had been mailed and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that had been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, knowing that the images and videos were child pornography.

The child pornography that defendant JOHNSON possessed consisted of the following videos titled:

- "boy+boy s8 (f) loverboys 11 yo boys pedo gay pthc
 boy.lnk";
- 2. "!!!!!!!! [boy+man] sasha 12 yo boyfuck video!
 (best!).avi";
- 3. "[m+b] 5yo boy takes cock up the butt (man, boy, boylove, toddler, anal, pedo, gay).mp4";
- 4. "Pedo boy- Cristian is on his back taking all of a mans hard cock Only 10yo PTHC GAY Anal Colombia.avi";
 - 5. "f60ec990-9ac6-4218-aa25-b20f98535ded.mpg"; and
 - 6. "boyfuck man fucks his boy jared 11y in bathtub.avi".

FORFEITURE ALLEGATION

[18 U.S.C. § 2253]

- 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 2253, in the event of the defendant's conviction of the offenses set forth in any of Counts One through Fourteen of this Indictment.
- 2. The defendant, if so convicted, shall forfeit to the United States of America the following property:
- (a) All right, title, and interest in any visual depiction involved in any such offense, or any book, magazine, periodical, film videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received and involved in any such offense;
- (b) All right, title, and interest in any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense;
- (c) All right, title, and interest in any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property; and
- (d) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a), (b), and (c).
- 3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), the defendant, if so convicted, shall forfeit substitute property,

| up to the total value of the property described in the preceding | | | |
|---|--|--|--|
| paragraph if, as the result of any act or omission of the defendant | | | |
| the property described in the preceding paragraph, or any portion | | | |
| thereof: (a) cannot be located upon the exercise of due diligence; | | | |
| (b) has been transferred, sold to or deposited with a third party; | | | |
| (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 divided without difficulty. | | | |
| A TRUE BILL | | | |
| /s/ | | | |
| Foreperson | | | |
| E MADETH ECHDADA | | | |

E. MARTIN ESTRADA United States Attorney

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