UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF A	Δ MERIC Δ

Plaintiff,

VS.

LUCAS RUSSELL VANWOERT, a/k/a "Graves,"

INDICTMENT

Defendant.

The Grand Jury charges:

COUNT 1 (Creation of Animal Crush Video)

Between on or about November 16, 2020, and on or about April 22, 2022, the exact date being unknown to the grand jury, in Kent County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

LUCAS RUSSELL VANWOERT, a/k/a "Graves,"

knowingly created an animal crush video and the video was distributed in, or using a means and facility of, interstate and foreign commerce.

Specifically, on November 16, 2020, the defendant knowingly created an obscene video or digital recording, with the digital file identifier of "144 20201116_020629," that depicted a dog being sexually assaulted, impaled, and otherwise subjected to serious bodily injury and resulted in killing the dog. At some time later, the video was sent via an internet chat application to an individual in McMinns Lagoon, Northern Territory, Australia.

18 U.S.C. § 48(a)(2)(B) and (c)

COUNT 2 (Creation of Animal Crush Video)

Between on or about November 16, 2020, and on or about April 22, 2022, the exact date being unknown to the grand jury, in Kent County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

LUCAS RUSSELL VANWOERT, a/k/a "Graves,"

knowingly created an animal crush video and the video was distributed in, or using a means and facility of, interstate and foreign commerce.

Specifically, on November 16, 2020, the defendant knowingly created an obscene video or digital recording, with the digital file identifier of "50 20201116_002421," that depicted a dog being sexually assaulted, impaled, and otherwise subjected to serious bodily injury and resulted in killing the dog. At some time later, the video was sent via an internet chat application to an individual in McMinns Lagoon, Northern Territory, Australia.

18 U.S.C. § 48(a)(2(B) and (c)

COUNT 3 (Creation of Animal Crush Video)

Between on or about November 16, 2020, and on or about April 22, 2022, the exact date being unknown to the grand jury, in Kent County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

LUCAS RUSSELL VANWOERT, a/k/a "Graves,"

knowingly created an animal crush video and the video was distributed in, or using a means and facility of, interstate and foreign commerce.

Specifically, on November 16, 2020, the defendant knowingly created an obscene video or digital recording, with the digital file identifier of "604 20201116_005923," that depicted a dog being sexually assaulted, impaled, and otherwise subjected to serious bodily injury and resulted in killing the dog. At some time later, the video was sent via an internet chat application to an individual in McMinns Lagoon, Northern Territory, Australia.

18 U.S.C. § 48(a)(2)(B) and (c)

COUNT 4 (Creation of Animal Crush Video)

Between on or about November 15, 2020, and on or about April 22, 2022, the exact date being unknown to the grand jury, in Kent County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

LUCAS RUSSELL VANWOERT, a/k/a "Graves,"

knowingly created an animal crush video and the video was distributed in, or using a means and facility of, interstate and foreign commerce.

Specifically, on November 15, 2020, the defendant knowingly created an obscene video or digital recording, with the digital file identifier of "496 20201115_232003," that depicted a dog being sexually assaulted, impaled, and otherwise subjected to serious bodily injury and resulted in killing the dog. At some time later, the video was sent via an internet chat application to an individual in McMinns Lagoon, Northern Territory, Australia.

18 U.S.C. § 48(a)(2)(B) and (c)

COUNT 5 (Distribution of Animal Crush Video)

Between on or about November 16, 2020, and on or about April 22, 2022, the exact date being unknown to the grand jury, in Kent County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

LUCAS RUSSELL VANWOERT, a/k/a "Graves,"

knowingly exchanged and distributed an animal crush video in, and using a means and facility of, interstate and foreign commerce.

Specifically, the defendant knowingly sent via an internet chat application to an individual in McMinns Lagoon, Northern Territory, Australia, an obscene video or digital recording, with the digital file identifier of "144 20201116_020629," that depicted a dog being sexually assaulted, impaled, and otherwise subjected to serious bodily injury and resulted in killing the dog.

18 U.S.C. § 48(a)(3) and (c)

COUNT 6 (Distribution of Animal Crush Video)

Between on or about November 16, 2020, and on or about April 22, 2022, the exact date being unknown to the grand jury, in Kent County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

LUCAS RUSSELL VANWOERT, a/k/a "Graves,"

knowingly exchanged and distributed an animal crush video in, and using a means and facility of, interstate and foreign commerce.

Specifically, the defendant knowingly sent via an internet chat application to an individual in McMinns Lagoon, Northern Territory, Australia, an obscene video or digital recording, with the digital file identifier of "50 20201116_002421," that depicted a dog being sexually assaulted, impaled, and otherwise subjected to serious bodily injury and resulted in killing the dog.

18 U.S.C. § 48(a)(3) and (c)

COUNT 7 (Distribution of Animal Crush Video)

Between on or about November 16, 2020, and on or about April 22, 2022, the exact date being unknown to the grand jury, in Kent County, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

LUCAS RUSSELL VANWOERT, a/k/a "Graves,"

knowingly exchanged and distributed an animal crush video in, and using a means and facility of, interstate and foreign commerce.

Specifically, the defendant knowingly sent via an internet chat application to an individual in McMinns Lagoon, Northern Territory, Australia, an obscene video or digital recording, with the digital file identifier of "604 20201116_005923," that depicted a dog being sexually assaulted, impaled, and otherwise subjected to serious bodily injury and resulted in killing the dog.

18 U.S.C. § 48(a)(3) and (c)

COUNT 8 (Distribution of Animal Crush Video)

Between on or about November 16, 2020, and on or about April 22, 2022, the exact date being unknown to the grand jury, in Kent County, in the Southern Division of the Western

District of Michigan, and elsewhere, the defendant,

LUCAS RUSSELL VANWOERT, a/k/a "Graves,"

knowingly exchanged and distributed an animal crush video in, and using a means and facility of, interstate and foreign commerce.

Specifically, the defendant knowingly sent via an internet chat application to an individual in McMinns Lagoon, Northern Territory, Australia, an obscene video or digital recording, with the digital file name of "496 20201115_232003," that depicted a dog being sexually assaulted, impaled, and otherwise subjected to serious bodily injury and resulted in killing the dog.

18 U.S.C. § 48(a)(3) and (c)

A TRUE BILL

GRAND JURY FOREPERSON

MARK A. TOTTEN United States Attorney

DANIEL Y. MEKARU

Assistant United States Attorney