

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT BERNDT,

Defendant.

CASE NO.

JUDGE

INFORMATION

18 U.S.C. § 371

U.S. DISTRICT COURT
SOUTHERN DISTRICT
OF OHIO-COLUMBUS

2:25-CR-52
Judge Graham

THE UNITED STATES ATTORNEY'S OFFICE AND THE UNITED STATES
DEPARTMENT OF JUSTICE, ENVIRONMENT AND NATURAL RESOURCES
DIVISION, CHARGE:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Information:

Legal Background

1. The term “animal crushing” meant actual conduct in which one or more living-non-human mammals were purposely crushed, burned, drowned, suffocated, impaled, or otherwise subjected to serious bodily injury. 18 U.S.C. § 48(f)(1).

2. The term “serious bodily injury” meant injuries which involved a substantial risk of death; extreme physical pain; protracted or obvious disfigurement; and protracted loss or impairment of the function of a bodily member or organ. 18 U.S.C. § 48(f)(1) (*citing* 18 U.S.C. § 1365).

3. Instances of sexual abuse by force and sexual abuse in which the victim was not physically capable of declining participation were also included within the definition of animal crushing. 18 U.S.C. § 48(f)(1) (*citing* 18 U.S.C. §§ 2241, 2242).

4. The term “animal crush video” meant any photograph, motion-picture film, video or digital recording, or electronic image that depicted animal crushing and was obscene. 18 U.S.C. § 48(f)(2)(A)-(B).

5. It was unlawful for any person to knowingly sell, market, advertise, exchange, or distribute an animal crush video in, or using a means or facility of, interstate or foreign commerce. 18 U.S.C. § 48(a)(3).

6. It was unlawful for any person to knowingly create an animal crush video if the person intended or had reason to know that the animal crush video would be distributed in, or using a means or facility of, interstate or foreign commerce; or where the animal crush video was distributed in, or using a means or facility of, interstate or foreign commerce. 18 U.S.C. § 48(a)(2).

Factual Background and Relevant Parties

7. ROBERT BERNDT was a resident of Pennsylvania.

8. Co-Conspirator Ronald P. Bedra (Bedra) was a resident of the Southern District of Ohio.

9. Beginning no later than June 16, 2021, BERNDT belonged to an association of people who watched and discussed obscene videos of monkeys being tortured and abused.

10. These people congregated online using various platforms such as Telegram and Signal, which served as an online meeting place on which members shared and discussed videos of monkeys being beaten, cut, burned, mutilated, and sexually abused.

11. BERNDT, under the screenname “Requiem Rhythm” was the Administrator of some of these groups. Another Administrator was Bedra.

12. It was the practice of some members to send money to individuals in Indonesia (known as “videographers” or “VOs”) to commission the creation of bespoke videos. The requester would send instructions with the specific acts of crushing the requester wished to see. The videographer would then obtain a monkey, often using funds sent from the United States by one or more members, and subject the animal to the acts requested while filming. The videographer would then distribute the resulting video electronically to the requester using email, phone-based messaging programs, and/or online storage platforms.

13. The requester would then distribute the commissioned videos to other members using the bulletin board itself or by mail, email, phone-based messaging programs, and/or online storage platforms.

14. At various points in time, the groups in question would be suspended or otherwise removed from the online platforms due to the content they were distributing. Following such occurrences, group members would create new groups, such as “Last of the Last Stands,” “The Trail of Trillion Tears,” “Video Connect” and others.

COUNT 1

Conspiracy to Create and Distribute Animal Crush Videos

18 U.S.C. § 371

15. Paragraphs 1 through 14 of this Information are hereby realleged and incorporated by reference as if fully set forth herein.

16. Between on or about October 9, 2021, and March 12, 2022, defendant ROBERT BERNDT, along with others known and unknown to the United States, did knowingly and

willfully conspire and agree with each other and others to violate 18 U.S.C. §§ 48(a)(2) (creation of animal crush videos) and 48(a)(3) (distribution of animal crush videos).

Manners and Means

17. Among the manners and means employed by ROBERT BERNDT and his co-conspirators to carry out the conspiracy and effect its unlawful objects were:

- a. To use phone-based messaging programs to discuss the financing and creation of animal crush videos;
- b. To use phone-based messaging programs and other electronic means to contact and solicit individuals living overseas (“videographers”) willing to film themselves carrying out specified violent, obscene acts against monkeys in exchange for payment;
- c. To use third-party payment providers to pool money and pay videographers in exchange for subjecting monkeys to the specified acts of crushing, creating a video recording of those acts of crushing, and distributing the resultant video in interstate and foreign commerce; and
- d. To use phone-based messaging programs and other electronic means to distribute the animal crush videos among the members of the conspiracy.

Overt Acts

18. In furtherance of the conspiracy and in order to effect its objectives, ROBERT BERNDT (BERNDT) and his co-conspirators committed and caused to be committed the following overt acts in the Southern District of Ohio and elsewhere, the dates stated being approximate:

Overt Act 1. On or about October 9, 2021, in the chat group “the last of the last stands” on a phone-based messaging program that included co-conspirator 2 (CC2), Ronald Bedra, and others, BERNDT sent the following message: “well we’ve had some approval of the idea of taking a screwdriver... getting it white hot... and then shoving it up a monk’s asshole and holding the monk by the screwdriver’s handle while it goes nutso...”

Overt Act 2. On October 9, 2021, in the chat group “the last of the last stands,” BERNDT sent the following messages:

BERNDT: I’d like to see him DESTROY a female monkey’s itty bitty clitty bump,.. or just cut it off

BERNDT: Haha could get a male “excited” and when the pinky winky is all out to play...

BERNDT: SNIP

BERNDT: cut a bit off and repeat until nothing left

Overt Act 3. On or about February 16, 2022, in the chat group “the trail of trillion tears” on a phone-based messaging program that included BERNDT, Bedra, CC2, CC4, and others, the coconspirators exchanged the following messages:

CC2: Ohh, RR this should make you happy... I told [VO2] we would pay big money for a hot screwdriver up the ass video...

CC4: Good idea. The screwdriver vid shall finally come to fruition!!

Bedra: YES PLEASE...Get screwdriver RED HOT. Put it up ass. Hold screwdriver still and spin monkey on it.

Overt Act 4. On or about March 11, 2022, a videographer overseas created a video of a heated screwdriver being pressed against, and inserted into a monkey's anus and sent that video from Indonesia to CC2 in the United States using a phone-based messaging application.

Overt Act 5. On or about March 11, 2022, CC2 received the video of a heated screwdriver being inserted into a monkey's anus and distributed it using an online messaging application to Bedra in the Southern District of Ohio.

Overt Act 6. On or about March 20, 2022, CC2 distributed the "screwdriver video" to other co-conspirators by posting it in an online message group known as "Video Connect" that included BERNDT, Bedra, and others.

All in violation of 18 U.S.C. § 371.

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