

**SEALED**

**FILED**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

**MAR 13 2024**

**UNITED STATES OF AMERICA,**

*Plaintiff,*

**v.**

**ANTHONY JAMES DEASON,**

*Defendant.*

By BONNIE HACKLER  
Clerk, U.S. District Court  
Deputy Clerk

**SEALED**

**Case No.**

**24 CR 045 JFH**

**INDICTMENT**

The Federal Grand Jury charges:

**COUNT ONE**

**ATTEMPTED SEXUAL EXPLOITATION OF A CHILD/  
USE OF A CHILD TO PRODUCE A VISUAL DEPICTION  
[18 U.S.C. § 2251(a) & (e)]**

Between on or about October 26, 2023, and on or about October 30, 2023, in the Eastern District of Oklahoma, the defendant, **ANTHONY JAMES DEASON**, did attempt to employ, use, persuade, induce, entice, and coerce Victim 1, a minor, to engage in any sexually explicit conduct, as that term is defined in Title 18, United States Code, Section 2256(2), for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and such visual depiction would be produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction would be transported and transmitted using any means and facility of interstate

and foreign commerce and in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT TWO**

**ATTEMPTED SEXUAL EXPLOITATION OF A CHILD/  
USE OF A CHILD TO PRODUCE A VISUAL DEPICTION  
[18 U.S.C. § 2251(a) & (e)]**

Between on or about October 26, 2023, and on or about October 30, 2023, in the Eastern District of Oklahoma, the defendant, **ANTHONY JAMES DEASON**, did attempt to employ, use, persuade, induce, entice, and coerce Victim 2, a minor, to engage in any sexually explicit conduct, as that term is defined in Title 18, United States Code, Section 2256(2), for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and such visual depiction would be produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

**COUNT THREE**

**TRANSFER OF OBSCENE MATERIAL TO MINORS  
[18 U.S.C. § 1470]**

Between on or about October 26, 2023, and on or about October 30, 2023, in the Eastern District of Oklahoma, the defendant, **ANTHONY JAMES DEASON**, did, by using any facility and means of interstate commerce, knowingly transfer, and attempt to transfer, obscene matter to

Victim 1, a minor, who had not attained the age of 16 years, knowing that the other individual had not attained the age of 16 years in violation of Title 18, United States Code, Section 1470.

**FORFEITURE ALLEGATION**  
**[18 U.S.C. § 2253]**

1. The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253.

2. Upon conviction of any of the violations charged in Counts One and Two of this Indictment involving violations of Title 18, United States Code, Sections 2251(a) and 2251(e), the defendant, **ANTHONY JAMES DEASON**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all of the defendant's right, title and interest in:

a) any visual depiction described in section 2251, 2251A, or 2252, 2252A, 2252B, or 2260 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received;

b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained, directly or indirectly, from such offense; and

c) any property, real or personal, used or intended to be used to commit or to promote and facilitate the commission of such offense or any property traceable to such property.

3. The property subject to forfeiture, pursuant to Title 18, United States Code, Section 2253, includes, but is not limited to: one (1) Apple iPhone 15 Pro Max, with IMEI Number 3354773167973753.

**FORFEITURE ALLEGATION**  
**[18 U.S.C. § 1467]**

1. The allegations contained in Count Three are incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 1467.

2. Upon conviction of the violation charged in Count Three of this Indictment involving violation of Title 18, United States Code, Section 1470, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1467:

a) any obscene material produced, transported, mailed, shipped, or received in violation of Chapter 71 of Title 18;

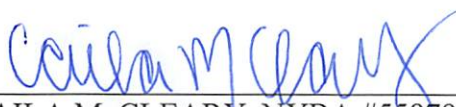
b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and

c) any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

3. The property to be forfeited includes, but is not limited to, the following: one (1) Apple iPhone 15 Pro Max, with IMEI Number 3354773167973753.

A TRUE BILL:

CHRISTOPHER J. WILSON  
United States Attorney

  
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CAILA M. CLEARY, NYBA #5587951  
Assistant United States Attorney

Pursuant to the E-Government Act,  
the original indictment has been filed  
under seal in the Clerk's Office.

s / Foreperson  
FOREPERSON OF THE GRAND JURY