

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. **18 - 20522**

18 U.S.C. § 2511

18 U.S.C. § 2257

18 U.S.C. § 2513

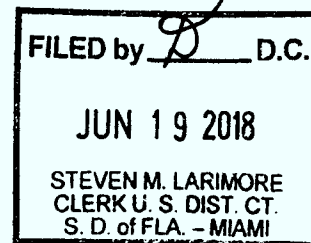
CR-ALTONAGA /GOODMAN

UNITED STATES OF AMERICA

vs.

BRYAN DENEUMOSTIER,
a/k/a "susanleon33326,"

Defendant.



INDICTMENT

The Grand Jury charges that:

COUNTS 1-2

18 U.S.C. § 2511(1)(b)(iii)

(Prohibited Interception and Disclosure of Oral Communications)

On or about the dates specified below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

BRYAN DENEUMOSTIER,
a/k/a "susanleon33326,"

did intentionally use any electronic, mechanical, and other device, including an Apple iPhone and iPad, to intercept any oral communication, as detailed below, when defendant knew, and had reason to know, that such device and any component of such device had been sent through the mail and transported in interstate and foreign commerce:

Count	Approx. Date	Interception of Oral Communication
1	May 6, 2015	Audio and video recording of Victim One engaged in sexual activity with BRYAN DENEUMOSTIER
2	July 24, 2015	Audio and video recording of Victim Two engaged in sexual activity with BRYAN DENEUMOSTIER

In violation of Title 18, United States Code, Sections 2511(1)(b)(iii) and 2.

Pursuant to Title 18, United States Code, Section 2511(2)(d), it is further alleged that such oral communication was intercepted for the purpose of committing any tortious act in violation of the laws of any State, that is, Florida Statute Section 540.08, which prohibits the unauthorized publication of a person’s photograph or likeness without such person’s consent.

COUNTS 3-5
18 USC § 2257
(Failure to Comply with Record Keeping Requirements)

On or about the dates specified below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

BRYAN DENEUMOSTIER,
a/k/a “susanleon33326,”

did produce a film, videotape and other matter, that is, videos that were posted to Website A, as detailed below, which contained one or more visual depictions of actual sexually explicit conduct made after November 1, 1990 and which was produced in whole or in part with materials which had been mailed and shipped in interstate and foreign commerce and which was shipped and transported and intended for shipment and transportation in interstate and foreign commerce, without creating and maintaining individually identifiable records pertaining to every performer portrayed in such visual depiction:

Count	Approx. Date	Performer	Video Title
3	Sept. 3, 2015 to April 11, 2018	Victim One	Hookup 407
4	July 28, 2016 to April 11, 2018	Victim Two	Hookup 500
5	Oct. 5, 2017 to April 11, 2018	Victim Three	Hookup 589

In violation of Title 18, United States Code, Sections 2257(f)(1) and 2.

CRIMINAL FORFEITURE ALLEGATIONS

1. The allegations in this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which defendant, **BRYAN DENEUMOSTIER**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 2511, as alleged in this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2513, any electronic, mechanical, and other device used, sent, carried, manufactured, assembled, possessed, sold, and advertised in such violation.

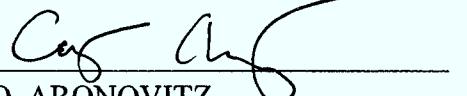
All pursuant to Title 18, United States Code, Section 2513, Title 28, United States Code, Section 2461(c), and the procedures set forth in Title 21, United States Code, Section 853.

A TRUE BILL


FOREPERSON



BENJAMIN G. GREENBERG
UNITED STATES ATTORNEY



CARY O. ARONOVITZ
Assistant United States Attorney



MONA SEDKY
Senior Trial Attorney, Department of Justice
Computer Crime & Intellectual Property Section

UNITED STATES OF AMERICA

CASE NO. _____

vs.

CERTIFICATE OF TRIAL ATTORNEY*

BRYAN DENEUMOSTIER,

Defendant.

_____ /

Superseding Case Information:

Court Division: (Select One)

x Miami _____ Key West _____
 _____ FTL _____ WPB _____ FTP _____

New Defendant(s) Yes _____ No _____
 Number of New Defendants _____
 Total number of counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
3. Interpreter: (Yes or No) No
 List language and/or dialect _____
4. This case will take 3-4 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I 0 to 5 days <u> X </u>	Petty _____
II 6 to 10 days _____	Minor _____
III 11 to 20 days _____	Misdem. _____
IV 21 to 60 days _____	Felony <u> x </u>
V 61 days and over _____	

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes: Judge: Case No. _____


(Attach copy of dispositive order)
 Has a complaint been filed in this matter? (Yes or No) No

If yes: Magistrate Case No. _____
 Related Miscellaneous numbers: _____
 Defendant(s) in federal custody as of _____
 Defendant(s) in state custody as of _____
 Rule 20 from the _____ District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? _____ Yes x No

8. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to September 1, 2007? _____ Yes x No



 CARY O. ARONOVITZ
 ASSISTANT UNITED STATES ATTORNEY
 Florida Bar No. 86425

*Penalty Sheet(s) attached

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: BRYAN DENEUMOSTIER

Case No: _____

Counts #: 1-2

Unlawful Recordings of Individuals

Title 18, United States Code, Sections 2511 and 2

*Max. Penalty: 5 Years' Imprisonment

Counts #: 3-5

Failure to Maintain Records of those Engaged in Commercial Sexual Acts

Title 18, United States Code, Sections 2257 and 2

*Max. Penalty: 5 Years' Imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**