

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

2010 APR 15 PM 2:51

U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE, FLORIDA

UNITED STATES OF AMERICA

v.

LUCAS MICHAEL CHANSLER

CASE NO. 3:10-cr- 100-J-347EM  
Cts. 1-4: 18 U.S.C. § 875(d)  
Cts. 5-13: 18 U.S.C. § 2251(a)  
Ct. 14: 18 U.S.C. § 2252(a)(2)  
Ct. 15: 18 U.S.C. § 2252(a)(4)(B)  
Forfeitures: 18 U.S.C. § 981(a)(1)(C) &  
28 U.S.C. § 2461(c)  
18 U.S.C. § 2253

**INDICTMENT**

The Grand Jury charges:

**COUNTS ONE THROUGH FOUR**

1. Beginning in or about 2007, and continuing until on or about January 8, 2010, in St. Johns County, in the Middle District of Florida and elsewhere, defendant, LUCAS MICHAEL CHANSLER, repeatedly used computers and interactive computer services to transmit threatening communications to several minor female children located all across the United States.

2. CHANSLER transmitted these threatening communications with the intent to extort, and attempt to extort things of value from the minor victim addressees, that is, digital still images and webcam video of the minor victim addressees in various states of undress, exposing themselves and engaging in sexually explicit conduct.

3. In his threatening communications, CHANSLER engaged in a pattern of extortion or attempted extortion in which he would at first pretend to be a

friend, acquaintance or admirer of the minor victim addressees on social networking websites such as MySpace and Facebook. For that purpose, CHANSLER used a series of different online screen names, including "SK8er4life2021," "argon1049," "Jimmy," "Joseph Spiegert," "Alexey Vermon," "Victor Hughes," "Victor Hugo," "JosephSS0014," "purple34885," "CaptainObvious," "JimmyNeuton," "Jneut1616," and "zooba10111." In order to further conceal his true identity, CHANSLER sometimes used proxy servers and routed his communications over the internet through foreign countries.

4. After gaining some measure of trust from a minor victim addressee, CHANSLER would request that the minor victim addressee engage in a live video chat session with him via the internet. During this video chat session, CHANSLER would use a computer program to record the video session without the knowledge of the minor victim addressee.

5. During this video session, CHANSLER would ask the minor victim addressee to expose her breasts or genitalia. Often CHANSLER would entice the minor victim addressees to so expose themselves by showing them streaming video of a minor male exposing himself or engaging in masturbation. Unbeknownst to the minor victim addressees, CHANSLER did not always show himself during these webcam video sessions but rather would use sexually explicit videos of other males which he had collected.

6. If a minor victim addressee did expose herself to CHANSLER during a video chat session, this conduct would be recorded by CHANSLER, and then he would send a copy or portion of the video recording to the minor victim addressee.

CHANSLER would then demand that the minor victim addressee send him additional and more sexually explicit digital still images or webcam video. He would inform the minor victim addressee that if she did not comply with his demand, he would injure her reputation by sending the sexually explicit images and videos to her friends, or by posting the images or videos to a public website.

7. Some of the minor victim addressees complied with CHANSLER's demands, while others did not. With some of those who complied, CHANSLER carried on a continuing pattern of extortion by sending more threatening communications and demanding additional sexually explicit images and videos from the minors.

8. All of the threatening communications made by CHANSLER were transmitted over the internet using a facility of interstate and foreign commerce, that is, a computer and interactive computer service connected to the internet.

#### **COUNT ONE**

9. Paragraphs 1 through 8 of this Indictment are hereby realleged and incorporated by reference herein.

10. From on or about December 22, 2007 through on or about July 26, 2008, in St. Johns County, in the Middle District of Florida and elsewhere,

**LUCAS MICHAEL CHANSLER,**

defendant herein, with the intent to extort things of value, did knowingly and willfully transmit in interstate and foreign commerce via the internet communications containing threats to injure the reputation of the addressee and of another, that is, defendant threatened S. C., a minor, that defendant would distribute photographic images and

videos of that minor to individuals who knew the minor if the minor refused to send photographic images and videos of herself to defendant.

All in violation of Title 18, United States Code, Section 875(d).

**COUNT TWO**

11. Paragraphs 1 through 8 of this Indictment are hereby realleged and incorporated by reference herein.

12. From on or about June 9, 2009 through on or about October 17, 2009, in St. Johns County, in the Middle District of Florida and elsewhere,

LUCAS MICHAEL CHANSLER,

defendant herein, with the intent to extort things of value, did knowingly and willfully transmit in interstate and foreign commerce via the internet communications containing threats to injure the reputation of the addressee and of another, that is, defendant threatened B. N., a minor, that defendant would distribute photographic images and videos of that minor to individuals who knew the minor if the minor refused to send photographic images and videos of herself to defendant.

All in violation of Title 18, United States Code, Section 875(d).

**COUNT THREE**

13. Paragraphs 1 through 8 of this Indictment are hereby realleged and incorporated by reference herein.

14. From on or about June 10, 2008 through on or about December 21, 2009, in St. Johns County, in the Middle District of Florida and elsewhere,

LUCAS MICHAEL CHANSLER,

defendant herein, with the intent to extort things of value, did knowingly and willfully transmit in interstate and foreign commerce via the internet communications containing threats to injure the reputation of the addressee and of another, that is, defendant threatened A. R., a minor, that defendant would distribute photographic images and videos of that minor to individuals who knew the minor if the minor refused to send photographic images and videos of herself to defendant.

All in violation of Title 18, United States Code, Section 875(d).

**COUNT FOUR**

15. Paragraphs 1 through 8 of this Indictment are hereby realleged and incorporated by reference herein.

16. From on or about February 25, 2009 through on or about January 1, 2010, in St. Johns County, in the Middle District of Florida and elsewhere,

LUCAS MICHAEL CHANSLER,

defendant herein, with the intent to extort things of value, did knowingly and willfully transmit in interstate and foreign commerce via the internet communications containing threats to injure the reputation of the addressee and of another, that is, defendant threatened C. S., a minor, that defendant would distribute photographic images and

videos of that minor to individuals who knew the minor if the minor refused to send photographic images and videos of herself to defendant.

All in violation of Title 18, United States Code, Section 875(d).

**COUNT FIVE**

From on or about December 22, 2007 through on or about July 26, 2008, in St. Johns County, in the Middle District of Florida, and elsewhere,

LUCAS MICHAEL CHANSLER,

defendant herein, did knowingly, willfully and intentionally employ, use, persuade, induce, entice, and coerce S. C., a minor, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were transported in interstate and foreign commerce by any means, that is, by computer via the internet, and which visual depictions are specifically identified in the following computer file, among others:

1. 07-25-08 epic show (BM).avi.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT SIX**

From on or about January 4, 2009 through on or about January 11, 2009, in St. Johns County, in the Middle District of Florida, and elsewhere,

LUCAS MICHAEL CHANSLER,

defendant herein, did knowingly, willfully and intentionally employ, use, persuade, induce, entice, and coerce C. C., a minor, to engage in sexually explicit conduct for the

purpose of producing visual depictions of such conduct, which visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce, that is, by computer via the internet, and which visual depictions are specifically identified in the following computer file, among others:

1. 01-04-09 nude & bate (fake guy).avi.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

#### **COUNT SEVEN**

On or about December 24, 2009, in St. Johns County, in the Middle District of Florida, and elsewhere,

LUCAS MICHAEL CHANSLER,

defendant herein, did knowingly, willfully and intentionally employ, use, persuade, induce, entice, and coerce M. K., a minor, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce, that is, by computer via the internet, and which visual depictions are specifically identified in the following computer file, among others:

1. 12-24-09 tits, puss, bate.avi.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

#### **COUNT EIGHT**

From on or about June 23, 2009 through on or about December 21, 2009, in St. Johns County, in the Middle District of Florida, and elsewhere,

**LUCAS MICHAEL CHANSLER,**

defendant herein, did knowingly, willfully and intentionally employ, use, persuade, induce, entice, and coerce A. K., a minor, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce, that is, by computer via the internet, and which visual depictions are specifically identified in the following computer file, among others:

1. abbyemily.avi.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT NINE**

From on or about June 9, 2009 through on or about October 17, 2009, in St. Johns County, in the Middle District of Florida, and elsewhere,

**LUCAS MICHAEL CHANSLER,**

defendant herein, did knowingly, willfully and intentionally employ, use, persuade, induce, entice, and coerce B. N., a minor, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce, that is, by computer via the internet, and which visual depictions are specifically identified in the following computer files, among others:

1. 06-19-09 nude (BM).avi;
2. Picture-56.jpg; and



3. Picture-57.jpg.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT TEN**

From on or about July 18, 2008 through on or about December 30, 2009,  
in St. Johns County, in the Middle District of Florida, and elsewhere,

LUCAS MICHAEL CHANSLER,

defendant herein, did knowingly, willfully and intentionally employ, use, persuade, induce, entice, and coerce E. N., a minor, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce, that is, by computer via the internet, and which visual depictions are specifically identified in the following computer files, among others:

1. lizypinkie.AVI; and
2. capcoll.JPG.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT ELEVEN**

From on or about June 10, 2008 through on or about December 21, 2009,  
in St. Johns County, in the Middle District of Florida, and elsewhere,

LUCAS MICHAEL CHANSLER,

defendant herein, did knowingly, willfully and intentionally employ, use, persuade, induce, entice, and coerce A. R., a minor, to engage in sexually explicit conduct for the

purpose of producing visual depictions of such conduct, which visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce, that is, by computer via the internet, and which visual depictions are specifically identified in the following computer files, among others:

1. 0726091300.jpg;
2. 0726091301.jpg; and
3. downsized\_0810090001.jpg.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

#### **COUNT TWELVE**

From on or about February 25, 2009 through on or about January 1, 2010, in St. Johns County, in the Middle District of Florida, and elsewhere,

LUCAS MICHAEL CHANSLER,

defendant herein, did knowingly, willfully and intentionally employ, use, persuade, induce, entice, and coerce C. S., a minor, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce, that is, by computer via the internet, and which visual depictions are specifically identified in the following computer files, among others:

1. 04-11-09 nude & rub (BM).avi;
2. 06-21-09 nude & bate (BM).avi; and
3. shhhhhhhh-028.jpg.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT THIRTEEN**

From on or about December 31, 2007 through on or about February 21, 2009, in St. Johns County, in the Middle District of Florida, and elsewhere,

LUCAS MICHAEL CHANSLER,

defendant herein, did knowingly, willfully and intentionally employ, use, persuade, induce, entice, and coerce A. W., a minor, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, which visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce, that is, by computer via the internet, and which visual depictions are specifically identified in the following computer files, among others:

1. Picture.avi;
2. Picture-663.jpg; and
3. Picture-669.jpg.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT FOURTEEN**

From on or about July 25, 2008 through on or about December 24, 2009, in St. Johns County, in the Middle District of Florida,

LUCAS MICHAEL CHANSLER,

defendant herein, did knowingly receive visual depictions using any means and facility of interstate and foreign commerce, that is, by computer via the internet, the production of which involved the use of a minor engaging in sexually explicit conduct, which visual

depictions were such conduct, and which visual depictions are specifically identified in the following computer files, among others:

1. 07-25-08 epic show (BM).avi;
2. 01-04-09 nude & bate (fake guy).avi;
3. 06-19-09 nude (BM).avi; and
4. 12-24-09 tits, puss, bate.avi.

In violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

**COUNT FIFTEEN**

On or about January 8, 2010, in St. Johns County, in the Middle District of Florida,

LUCAS MICHAEL CHANSLER,

defendant herein, did knowingly possess one (1) or more matters which contained visual depictions which were produced using materials which have been shipped and transported in or affecting interstate and foreign commerce, that is, a Western Digital computer hard disk drive, serial number WMATV0365632, the production of which visual depictions involved the use of minors engaging in sexually explicit conduct and which visual depictions were of such conduct, and which were specifically identified in the following computer files, among others:

1. lizypinkie.AVI;
2. 04-11-09 nude & rub (BM).avi;
3. 06-21-09 nude & bate (BM).avi; and

4. shhhhhhhh-028.jpg.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).

### **FORFEITURES**

1. The allegations contained in Counts One through Four and Counts Five through Fifteen of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 2253.

2. From his engagement in the violations alleged in Counts One through Four of this Indictment, each punishable by imprisonment for more than one year, the defendant,

LUCAS MICHAEL CHANSLER,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all of his interest in any property constituting or derived from proceeds obtained directly or indirectly as a result of the said violations.

3. From his engagement in the violations alleged in Counts Five through Fifteen of this Indictment, each punishable by imprisonment for more than one year, the defendant,

LUCAS MICHAEL CHANSLER,

shall forfeit to the United States of America, any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, and/or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

4. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or 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 which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title

28, United States Code, Section 2461(c), and/or Title 18, United States Code, Section 2253(b).

A TRUE BILL,

  
Foreperson

A. BRIAN ALBRITTON  
United States Attorney

By:

  
D. RODNEY BROWN  
Assistant United States Attorney

By:

  
JULIE HACKENBERRY SAVELL  
Assistant United States Attorney  
Chief, Jacksonville Division

**UNITED STATES DISTRICT COURT**

Middle District of Florida  
Jacksonville Division

**THE UNITED STATES OF AMERICA**

vs.

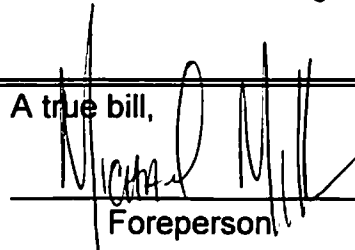
**LUCAS MICHAEL CHANSLER**

**INDICTMENT**

**Violations:**

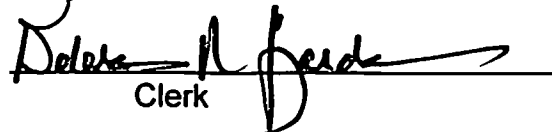
Cts. 1-4: 18 U.S.C. § 875(d)  
Cts. 5-13: 18 U.S.C. § 2251(a)  
Ct. 14: 18 U.S.C. § 2252(a)(2)  
Ct. 15: 18 U.S.C. § 2252(a)(4)(B)

A true bill,

  
Foreperson

Filed in open court this 15th day

of April, 2010.

  
Clerk

Bail \$ \_\_\_\_\_



## General Information

<b>Court</b>	United States District Court for the Middle District of Florida; United States District Court for the Middle District of Florida
<b>Federal Nature of Suit</b>	Criminal
<b>Docket Number</b>	3:10-cr-00100
<b>Status</b>	Closed