Eastern District of Kentucky
FILED
OCT 21 2021
AT LEXINGTON
ROBERT R. CARR
CLERK U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT**
**EASTERN DISTRICT OF KENTUCKY**
**CENTRAL DIVISION**
**FRANKFORT**

**UNITED STATES OF AMERICA**

**V.** **INDICTMENT NO.** 3:21-CR-21-GFVT

**EDWARD LEONIDAS LEWIS**

* * * * *

**THE GRAND JURY CHARGES:**

**COUNT 1**
**18 U.S.C. § 2251(a)**

On or about June 1, 2018, in Franklin County, in the Eastern District of Kentucky, and elsewhere,

**EDWARD LEONIDAS LEWIS**

employed, used, persuaded, induced, enticed, and coerced Minor Victim #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, knowing and having reason to know that the visual depiction was produced or transmitted using materials that were mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including computer, all in violation of 18 U.S.C. § 2251(a).

**COUNT 2**
**18 U.S.C. §§ 2251(a) and (e)**

On or about June 1, 2018, in Franklin County, in the Eastern District of Kentucky,

**EDWARD LEONIDAS LEWIS**

attempted to employ, use, persuade, induce, entice, and coerce Minor Victim # 1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, knowing and having reason to know that the visual depiction would be produced or transmitted using materials that were mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including computer, all in violation of 18 U.S.C. §§ 2251(a) and (e).

**COUNT 3**
**18 U.S.C. § 2251(a)**

On or about June 2, 2018, in Franklin County, in the Eastern District of Kentucky, and elsewhere,

**EDWARD LEONIDAS LEWIS**

employed, used, persuaded, induced, enticed, and coerced Minor Victim #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, knowing and having reason to know that the visual depiction was produced or transmitted using materials that were mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including computer, all in violation of 18 U.S.C. § 2251(a).

**COUNT 4**
**18 U.S.C. §§ 2251(a) and (e)**

On or about June 2, 2018, in Franklin County, in the Eastern District of Kentucky,

**EDWARD LEONIDAS LEWIS**

attempted to employ, use, persuade, induce, entice, and coerce Minor Victim # 1 to

engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, knowing and having reason to know that the visual depiction would be produced or transmitted using materials that were mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including computer, all in violation of 18 U.S.C. §§ 2251(a) and (e).

**COUNT 5**
**18 U.S.C. §§ 2251(a) and (e)**

On or about May 28, 2020, in Franklin County, in the Eastern District of Kentucky, and elsewhere,

**EDWARD LEONIDAS LEWIS**

attempted to employ, use, persuade, induce, entice, and coerce Minor Victim # 2 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, knowing and having reason to know that the visual depiction would be produced or transmitted using materials that were mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including computer, all in violation of 18 U.S.C. §§ 2251(a) and (e).

**COUNT 6**
**18 U.S.C. § 2252(a)(2)**

On or about August 7, 2018, in Franklin County, in the Eastern District of Kentucky,

**EDWARD LEONIDAS LEWIS**

did knowingly receive a visual depiction using any means or facility of interstate or foreign commerce, including by computer, and the production of said visual depiction

involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct, all in violation of 18 U.S.C. § 2252(a)(2).

**COUNT 7**
**18 U.S.C. § 2252(a)(4)(B) &(b)(1)**

On or about February 25, 2021, in Franklin County, in the Eastern District of Kentucky,

**EDWARD LEONIDAS LEWIS**

did knowingly possess a matter containing a visual depiction that was produced using materials that had been mailed, shipped or transported in interstate or foreign commerce by any means, including by computer, and the production of said visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct, all in violation of 18 U.S.C. § 2252(a)(4)(B) & (b)(1).

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

By virtue of the commission of the offenses alleged in this Indictment, any and all interest **EDWARD LEONIDAS LEWIS** has in the following property:

**COMPUTER AND ASSOCIATED EQUIPMENT**:

1. Blue Samsung Galaxy Note 9 cell phone, serial number RF8K8133YST;
2. HP Pavilion laptop computer, serial number 5CD6223N5P;
3. Sandisk Cruzer 4 GB flash drive, model number SDCZ35-004G;
4. Sandisk Cruzer 16 GB flash drive, model number SDCZ36-016G;
5. Plug-to-Cam "spy camera", camera id./user number C36694;
6. Plug-to-Cam "spy camera", camera id./user number C40159; and
7. All software and peripherals which are contained on or associated with the listed equipment.

is vested in the United States and hereby forfeited to the United States pursuant to 18 U.S.C. § 2253.

**A TRUE BILL**

[redacted]

**FOREPERSON**

**CARLTON S. SHIER, IV**
**ACTING UNITED STATES ATTORNEY**

## PENALTIES

**COUNTS 1-5:** Not less than 15 years nor more than 30 years imprisonment, $250,000 fine, and not less than 5 years nor more than lifetime supervised release.

If one prior conviction under chapter 110, section 1591, chapter 71, chapter 109A, or chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, abusive sexual contact involving a minor or ward, or sex trafficking of children, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, not less than 25 years nor more than 50 years imprisonment, $250,000 fine, and not less than 5 years nor more than lifetime supervised release.

If two or more prior convictions under chapter 110, chapter 71, chapter 109A, or chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to the sexual exploitation of children, not less than 35 years nor more than life imprisonment, $250,000 fine, and not less than 5 years nor more than lifetime supervised release.

**COUNTS 6:** Not less than 5 years nor more than 20 years imprisonment, $250,000 fine, and not less than 5 years nor more than lifetime supervised release.

If one prior conviction under chapter 110, section 1591, chapter 71, chapter 109A, or chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, or sex trafficking of children, not less than 15 years nor more than 40 years imprisonment, $250,000 fine, and not less than 5 years nor more than lifetime supervised release.

**COUNT 7:** Not more than 10 years imprisonment, $250,000 fine, and not less than 5 years nor more than lifetime supervised release.

Not more than 20 years imprisonment, $250,000 fine, and not less than 5 years nor more than lifetime supervised release if any visual depiction involves a prepubescent minor.

If one prior conviction under chapter 110, chapter 71, chapter 109A, or chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, not less than 10 years nor more than 20 years imprisonment, $250,000 fine, and not less than 5 years nor more than lifetime supervised release.

**PLUS:** Forfeiture of all listed property.

**PLUS:** Mandatory special assessment of $100 per count. Additional mandatory special assessment of $5,000 per count, pursuant to 18 U.S.C. § 3014, for non-indigent Defendants convicted of certain offenses, including those in chapter 110, committed after May 29, 2015 through December 31, 2021.

Pursuant to 18 U.S.C. §2259A, per count of no more than:

(1) $17,000.00 if convicted of 18 U.S.C. §2252(a)(4) or §2252A(a)(5);

(2) $35,000.00 if convicted of any other trafficking in child pornography offense as defined by §2259(c)(3), which includes offenses under 18 U.S.C. §§2251(d), 2252(a)(1) through (3), 2252A(a)(1) through (4), 2252A(g) (in cases in which the series of felony violations exclusively involves violations of sections 2251(d), 2252, 2252A(a)(1) through (5), or 2260(b)), or 2260(b);

(3) $50,000.00 if convicted of child pornography production as defined by 18 U.S.C. §2259(c)(1), which includes offenses under 18 U.S.C. §2251(a) through (c), 2251A, 2252A(g) (in cases in which the series of felony violations involves at least 1 of the violations listed in this subsection), 2260(a) or any

offense under chapter 109A or chapter 117 that involved the production of child pornography (as such term is defined in section 2256), for offenses committed after December 7, 2018.

**PLUS:** Restitution, if applicable.