

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

vs.

ASHLEY NICOLE RICHARDS  
BRENT JUSTICE,  
Defendants.

§  
§  
§  
§  
§  
§

CRIMINAL NO.

12CR 731

United States District Court  
Southern District of Texas  
FILED

NOV 28 2012

David J. Bradley, Clerk of Court

CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this Indictment:

1. The term "animal crush video" is defined, pursuant to Title 18, United States Code, Section 48(a)(1), means "any photograph, motion-picture film, video or digital recording, or electronic image that –

(1) depicts actual conduct in which 1 or more living non-human mammals, birds, reptiles, or amphibians is intentionally crushed, burned, drowned, suffocated, impaled, or otherwise subjected to serious bodily injury (as defined in section 1365 and including conduct that, if committed against a person and in the special maritime and territorial jurisdiction of the United States, would violate section 2241 or 2242); and

(2) is obscene."

2. The term "engaged in the business" as defined, pursuant to Title 18, United States Code, Section 1466(b), means that the person who produces, sells, or transfers or offers to sell or transfer

obscene matter devotes time, attention, or labor to such activities, as a regular course of trade or business, with the objective of earning a profit, although it is not necessary that the person make a profit or that the production, selling or transferring or offering to sell or transfer such material be the person's sole or principal business or source of income.

**COUNT ONE**  
**(Creation of Animal Crush Videos)**

On or about June, 2011, within the Southern District of Texas, and elsewhere,

**ASHLEY NICOLE RICHARDS**  
**BRENT JUSTICE,**

defendants herein, did knowingly create animal crush videos, including, but not limited to "puppy 1" and "puppy 2", intending and having reason to know that the videos would be distributed in, or using a means and facility of, interstate and foreign commerce.

**In violation of Title 18, United States Code, Section 48(b)(1)(A) and 2.**

**COUNT TWO**  
**(Creation of Animal Crush Videos)**

On or between February 22, 2010 and February 28, 2011, within the Southern District of Texas, and elsewhere,

**ASHLEY NICOLE RICHARDS**  
**BRENT JUSTICE,**

defendants herein, did knowingly create animal crush videos, including, but not limited to "whitechick 1", "whitechick 2" and "whitechick 3", intending and having reason to know that the videos would be distributed in, or using a means and facility of, interstate and foreign commerce.

**In violation of Title 18, United States Code, Section 48(b)(1)(A) and 2.**

**COUNT THREE**  
**(Creation of Animal Crush Videos)**

On or between November 1, 2011, and August 15, 2012, within the Southern District of Texas,  
and elsewhere,

**ASHLEY NICOLE RICHARDS**  
**BRENT JUSTICE,**

defendants herein, did knowingly create animal crush videos, including, but not limited to  
“blackluvsample”, distributing the animal crush video in, or using a means and facility of, interstate and  
foreign commerce.

**In violation of Title 18, United States Code, Section 48(b)(1)(B) and 2.**

**COUNT FOUR**  
**(Creation of Animal Crush Videos)**

On or between November, 2011 and August 8, 2012, within the Southern District of  
Texas, and elsewhere,

**ASHLEY NICOLE RICHARDS**  
**BRENT JUSTICE,**

defendants herein, did knowingly create animal crush videos, including, but not limited to  
“adammeetseve2”, intending and having reason to know that the videos would be distributed in, and  
were distributed in, or using a means and facility of, interstate or foreign commerce.

**In violation of Title 18, United States Code, Section 48(b)(1)(A), (b)(1)(B) and 2.**

**COUNT FIVE**  
**(Distribution of Animal Crush Videos)**

On or about August 10, 2012, within the Southern District of Texas, and elsewhere,

**ASHLEY NICOLE RICHARDS  
BRENT JUSTICE,**

defendants herein, did knowingly sell, market, advertise, exchange, and distribute an animal crush videos, including, but not limited to "adammeetseve2", in, or using a means and facility of, interstate and foreign commerce.

**In violation of Title 18, United States Code, Section 48(b)(2) and 2.**

**COUNT SIX**

**(Engaging in the Business of Selling or Transferring Obscene Matter)**

Beginning on November 1, 2011, and continuing through on or about August 10, 2012, within the Southern District of Texas, and elsewhere,

**ASHLEY NICOLE RICHARDS  
BRENT JUSTICE,**

defendants herein, engaged in the business of producing with the intent to distribute and sell, and engaged in the business of selling, obscene matter, did knowingly possess with intent to distribute obscene matter including, but not limited to, the video titled "adammeetseve," which has been shipped and transported in interstate and foreign commerce.

**In violation of Title 18, United States Code, Section 1466(a) and 2.**

**COUNT SEVEN**

**(Production and Transportation of Obscene Matters for Sale or Distribution)**

Beginning on February 22, 2010, and continuing through on or about February 28, 2011, within the Southern District of Texas, and elsewhere,

**ASHLEY NICOLE RICHARDS**

**BRENT JUSTICE,**

defendants herein, knowingly used a facility and means of interstate and foreign commerce, and an interactive computer service in and affecting interstate and foreign commerce, for the purpose of selling and distributing obscene material, including but not limited to the video, "whitechick1,"

**In violation of Title 18, United States Code, Section 1465 and 2.**

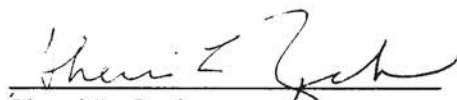
A True Bill:

Original Signature on File

Grand Jury Foreperson

KENNETH MAGIDSON  
United States Attorney

By:

  
\_\_\_\_\_  
Sherri L. Zack  
Assistant United States Attorney  
713-567-9374