

EJK:RTP  
F.#2012R00028

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

TALEEK BROOKS,  
  
Defendant.

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§  
2251(a), 2251(e),  
2252(a)(2), 2252(a)(4)(B),  
2252(b)(1), 2252(b)(2),  
2253 and 3551 et seq.;  
T. 21, U.S.C., § 853(p))

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THE GRAND JURY CHARGES:

COUNT ONE  
(Sexual Exploitation of a Child)

1. In or about and between September 2009 and April 2010, both dates being approximate and inclusive, within the Eastern District of New York, the defendant TALEEK BROOKS did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: John Doe, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, to wit: the images depicted in the computer files "111\_0735.mov," "111\_0736.mov," "111\_0737.mov," "111\_0738.mov," "111\_0739.mov," "111\_0740.mov" and "111\_0741.mov," which visual depictions were produced using materials that had been mailed, shipped and transported in and

affecting interstate and foreign commerce, to wit: one or more digital cameras and computer equipment.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT TWO

(Sexual Exploitation of a Child)

2. In or about and between September 2009 and April 2010, both dates being approximate and inclusive, within the Eastern District of New York, the defendant TALEEK BROOKS did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: John Doe, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, to wit: the images depicted in the computer files "111\_0984.mov," "111\_0985.mov" and "111\_0986.mov," which visual depictions were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, to wit: one or more digital cameras and computer equipment.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT THREE

(Sexual Exploitation of a Child)

3. In or about and between September 2009 and April 2010, both dates being approximate and inclusive, within the Eastern District of New York, the defendant TALEEK BROOKS did

knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: John Doe, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, to wit: the images depicted in the computer files "111\_0988.mov," "111\_0989.mov" and "111\_0991.mov," which visual depictions were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, to wit: one or more digital cameras and computer equipment.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT FOUR  
(Sexual Exploitation of a Child)

4. On or about March 16, 2010, within the Eastern District of New York, the defendant TALEEK BROOKS did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: John Doe, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, to wit: the images depicted in the computer files "DSCF8033.avi" and "DSCF8035.avi," which visual depictions were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign

commerce, to wit: one or more digital cameras and computer equipment.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT FIVE

(Sexual Exploitation of a Child)

5. On or about March 18, 2010, within the Eastern District of New York, the defendant TALEEK BROOKS did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: John Doe, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, to wit: the images depicted in the computer files "DSCF8099.avi," "DSCF8100.avi" and "DSCF8101.avi," which visual depictions were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, to wit: one or more digital cameras and computer equipment.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT SIX

(Sexual Exploitation of a Child)

6. On or about March 24, 2010, within the Eastern District of New York, the defendant TALEEK BROOKS did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: John Doe, to engage in sexually explicit

conduct for the purpose of producing one or more visual depictions of such conduct, to wit: the images depicted in the computer files "DSCF8108.jpg," "DSCF8109.jpg," "DSCF8110.jpg," "DSCF8115.jpg," "DSCF8116.avi," "DSCF8117.jpg," "DSCF8118.avi," "DSCF8119.avi" and "DSCF8120.avi," which visual depictions were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, to wit: one or more digital cameras and computer equipment.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT SEVEN  
(Sexual Exploitation of a Child)

7. On or about January 13, 2011, within the Eastern District of New York, the defendant TALEEK BROOKS did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: John Doe, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, to wit: the images depicted in the computer files "110113150358.3gp" and "110113150633.3gp," which visual depictions were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, to wit: one or more cell phones, digital cameras and computer equipment.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNTS EIGHT THROUGH ELEVEN  
(Distribution of Child Pornography)

8. On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendant TALEEK BROOKS did knowingly and intentionally distribute one or more visual depictions, to wit: the images depicted in the following computer files:

<u>COUNT</u>	<u>FILENAME</u>	<u>DATE</u>
EIGHT	Boy opened up wide by neighbor.flv	December 29, 2011
NINE	Img012.jpg	December 29, 2011
TEN	P1010026.jpg	December 29, 2011
ELEVEN	10yo_firsthair-10yoboy-fuck_4m39.3gp	December 29, 2011

using a means and facility of interstate commerce and which visual depictions had been mailed, and shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1) and 3551 et seq.)

COUNT TWELVE  
(Possession of Child Pornography)

9. On or about December 29, 2011, within the Eastern District of New York, the defendant TALEEK BROOKS did knowingly and intentionally possess matter containing one or more visual depictions, to wit: images contained in computer files on one Dell Dimension 8400 Tower, serial number 4Y0CH71, one Gateway laptop computer, serial number LUW820B004850245512547 and one Buffalo external hard drive, serial number 95508990930492, which visual depictions had been mailed, and shipped and transported using a means and facility of interstate and foreign commerce, and which were produced using materials which had been mailed and so shipped and transported, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

10. The United States hereby gives notice to the defendant charged in Counts One through Twelve that, upon his conviction of any of the charged offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253, of (a) any visual depiction described in Sections

2251, 2251A, 2252, 2252A, 2252B or 2260 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense(s) of conviction; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of the offense(s) of conviction or any property traceable to such property, including, but not limited to:

- a. One Dell Dimension 8400 Tower, serial number 4Y0CH71;
- b. One Gateway laptop computer, serial number LUW820B004850245512547;
- c. One Buffalo external hard drive, serial number 95508990930492;
- d. One Eastman Kodak M863 digital camera; and
- e. One Fujifilm Finepix S5700 digital camera.

11. If any of the above-described forfeitable property, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2253; Title 21, United States Code, Section 853(p))

A TRUE BILL

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FOREPERSON

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LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK