

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

May 22, 2024

SEAN F. MCAVOY, CLERK

1 Vanessa R. Waldref
2 United States Attorney
3 Eastern District of Washington
4 Rebecca R. Perez
5 Assistant United States Attorney
6 Post Office Box 1494
7 Spokane, WA 99210-1494
8 Telephone: (509) 353-2767

9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,

14 v.

15 DALLAS MICHAEL SHULER,
16
17 Defendant.

2:24-CR-72-TOR

INDICTMENT

Vio.: 18 U.S.C. § 2251(a), (e)
Production of Child
Pornography
(Count 1)

18 U.S.C.
§ 2252A(a)(2), (b)(1)
Distribution of Child
Pornography
(Count 2)

18 U.S.C.
§ 2252A(a)(2), (b)(1)
Receipt of Child
Pornography
(Count 3)

18 U.S.C. § 2253
Forfeiture Allegations

28 The Grand Jury charges:

COUNT 1

1
2 Beginning on or about May 2023, and continuing to May 2024, in the
3
4 Eastern District of Washington, the Defendant, DALLAS MICHAEL SHULER,
5 did knowingly employ, use, persuade, induce, entice, and coerce minors, namely
6
7 Minor 1 and Minor 2, to engage in sexually explicit conduct as defined in 18
8 U.S.C. § 2256(2)(A), for the purpose of producing any visual depiction of such
9
10 conduct, knowing and having reason to know such visual depiction would be
11 transported and transmitted using any means and facility of interstate and foreign
12 commerce, and in and affecting interstate and foreign commerce; and such visual
13
14 depiction having been produced using materials that had been mailed, shipped, and
15 transported in and affecting interstate and foreign commerce by any means,
16
17 including by computer; and such visual depiction was actually transported and
18 transmitted, using any means and facility of interstate and foreign commerce, and
19
20 in and affecting interstate and foreign commerce, all in violation of 18 U.S.C.
21 § 2251(a), (e).

COUNT 2

22
23
24 Beginning on or about May 2023, and continuing to May 2024, in the
25
26 Eastern District of Washington, the Defendant, DALLAS MICHAEL SHULER,
27 did knowingly distribute child pornography, as defined in 18 U.S.C. § 2256(8)(A),
28
which had been mailed, shipped and transported in interstate commerce by any

1 means, including by computer, and that was transported via any means or facility
2 of interstate and foreign commerce, to wit: images depicting minor children
3 engaging in sexually explicit conduct, including, but not limited to, the lascivious
4 exhibition of the genitals and pubic area, in violation of 18 U.S.C. § 2252A(a)(2),
5 (b)(1).
6
7

8 COUNT 3

9 Beginning on or about May 2023, and continuing to May 2024, in the
10 Eastern District of Washington, the Defendant, DALLAS MICHAEL SHULER,
11 did knowingly receive child pornography, as defined in 18 U.S.C. § § 2256(8)(A),
12 which had been mailed, shipped and transported in and affecting interstate and
13 foreign commerce by any means, including by computer, and that was transported
14 via any means or facility of interstate and foreign commerce, to wit: still images
15 and video files depicting minor and prepubescent children engaging in sexually
16 explicit conduct including actual and simulated intercourse, and the lascivious
17 exhibition of the genitals and pubic area, as defined in 18 U.S.C. § 2256(2)(A), all
18 in violation of 18 U.S.C. § 2252A(a)(2), (b)(1).
19
20
21
22
23

24 NOTICE OF FORFEITURE ALLEGATIONS

25 The allegations set forth in this Indictment are hereby realleged and
26 incorporated by reference for the purpose of alleging forfeitures.
27
28

1 Pursuant to 18 U.S.C. § 2253, upon conviction of an offense(s) in violation
2 of 18 U.S.C. § 2251 and/or 18 U.S.C. § 2252A, as alleged in this Indictment, the
3
4 Defendant, DALLAS MICHAEL SHULER, shall forfeit to the United States any
5 visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260,
6
7 or any book, magazine, periodical, film, videotape, or other matter which contains
8 any such visual depiction, which was produced, transported, mailed, shipped or
9
10 received in violation of this chapter; any property, real or personal, constituting or
11 traceable to gross profits or other proceeds obtained from such offenses; and, any
12 property, real or personal, used or intended to be used to commit or to promote the
13
14 commission of such offenses, or any property traceable to such property. The
15 property to be forfeited includes, but is not limited to:

- 16 - a light blue iPhone

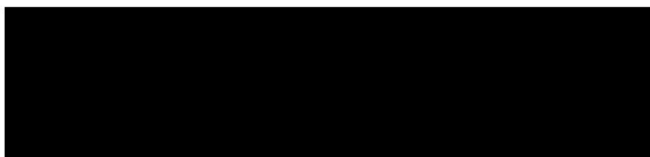
17
18 If any of the property described above, as a result of any act or omission of
19 the defendant:

- 20 a. cannot be located upon the exercise of due diligence;
- 21 b. has been transferred or sold to, or deposited with, a third party;
- 22 c. has been placed beyond the jurisdiction of the court;
- 23 d. has been substantially diminished in value; or
- 24 e. has been commingled with other property which cannot be divided
25 without difficulty,
26
27
28

1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).
3

4 DATED this 22nd day of May 2024.
5

6 A TRUE BILL
7



9 Vanessa R. Waldref
10 Vanessa R. Waldref
11 United States Attorney

12 Rebecca R. Perez
13 Rebecca R. Perez
14 Assistant United States Attorney
15
16
17
18
19
20
21
22
23
24
25
26
27
28