

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO. 16-60157-CR-HURLEY
CASE NO. 17-60002-CR-HURLEY**

UNITED STATES OF AMERICA

v.

LEE ROBERT MOORE,

Defendant.

_____ /

STIPULATED FACTUAL BASIS

LEE ROBERT MOORE (hereinafter referred to as “the defendant”) individually and by and through his counsel, Bruce Lehr, and the United States, by and through the undersigned Assistant United States Attorney and Trial Attorney, agree and stipulate that the government would produce evidence of the facts recited below which are a fair and accurate summary of the events and the defendant’s involvement in the conduct charged in both of the underlying Indictments (Case No. 16-60157-CR-HURLEY and 17-60002-CR-HURLEY) and the charges to which the defendant is pleading guilty.

Facts related to Delaware Charge (Case No. 17-60002-CR-HURLEY)

1. On August 24, 2015, a Delaware State Police Detective with the Delaware Child Predator Task Force (UC-1) was utilizing a created profile on the mobile-based, social media application “Meet24,” which employs the tagline, “Feel the taste of love.” This application geo-locates and identifies other “app” users who are in physical proximity, and provides a mobile-based platform for exchanging digital images, as well as voice and text messages. The application also notifies a user when other users view their profile. A search of publically available databases

revealed that Meet24 is hosted by a company in Germany. This same search revealed that the individual who registered the website and who is listed as the “Administrator” resides in the Ukraine.

2. UC-1’s Meet24 profile described UC-1 as a 14-year-old female from the Hazlett, Delaware area. UC-1 received a notification that a user “Rob” was viewing UC-1’s profile and was subsequently contacted by a user with the screen name of “Rob.” The Meet24 profile of “Rob” listed him as a 30-year-old male from Starkey Corner, Maryland. The user “Rob” was the defendant, Lee Robert Moore. UC-1 and the defendant engaged in an online communication via Meet24, during which UC-1 informed the defendant that UC-1 lived with her Mom and was currently in school. During the chat, the defendant asked what types of clothes UC-1 liked to wear. The defendant also stated that he was chatting while he was taking a shower and asked what UC-1 liked to wear to bed. The defendant sent UC-1 a picture of a middle-aged male and stated it was a photo of himself. At the end of this chat session, UC-1 asked the defendant if he wanted to chat on the social media application, “Kik,” which allows users to communicate online via a chat function and to exchange images and videos with other users. The defendant agreed and provided his Kik profile of “Rob N/A.”

3. On August 26, 2015, UC-1 was contacted via the Kik application by the defendant. During this chat session, the defendant told UC-1 that he wanted to meet her in person and asked where she lived. UC-1 informed the defendant that she lived near the Dover Air Force Base. The defendant discussed meeting with UC-1 and subsequently requested that UC-1 wear a skirt when they met.

4. On August 31, 2015, the defendant and UC-1 chatted via the Kik application.

During this session, the defendant initiated a conversation about sex and UC-1's prior sexual experiences. The defendant asked if UC-1 masturbated and stated that when they met in person, he wanted to make UC-1 have several orgasms. The defendant further stated that he would like UC-1 to perform oral sex on him and in return he would perform oral sex on UC-1 and penetrate her digitally.

5. During the chat, the defendant requested that UC-1 provide him with a photo focusing on UC-1's lips and mouth. The defendant sent UC-1 a photograph of himself lying on a bed. UC-1 sent the defendant a photograph of an actual female who appears to be a young teen. During the chat, the defendant became suspicious as to the actual identity of UC-1.

6. On September 24, 2015, a second Delaware State Trooper, who is female (UC-2), assumed the role of UC-1 in the online communication with the defendant. At approximately 3:26 p.m., on September 24, 2015, the defendant and UC-2 chatted via the Kik application. During this chat session, the defendant sent UC-2 a video of himself. In the video, the defendant can be seen in what appears to be a small room wearing what appears to be a tactical vest and a baseball-style hat with sunglasses. The video portrays the defendant in a small room waving at the camera. The defendant stated in the online chat with UC-2 that he was on break and had to go relieve someone.

7. On September 24, 2015, at approximately 3:28 p.m., at the defendant's request, UC-2 provided the defendant with a photograph of herself. This photograph appears to depict a young female teenager. The defendant responded: "you look cute . . . Now do a video." UC-2 then sent a video of herself, which appears to depict a teenage female holding a small cat near her face. During the chat, the defendant stated that he was "sitting in the break room" and "had 5

minutes [to chat]" before he had "to go relieve someone else to go on break."

20. On September 28, 2015, at approximately 4:00 p.m., the defendant and UC-2 chatted via the Kik application. During this chat session, the defendant states that he is "at work," and approximately 30 minutes later, the defendant writes that he is "on break now" and asks what UC-2 is currently wearing. The defendant and UC-2 discuss taking a motorcycle ride together and the defendant asks UC-2 what would make her more nervous: "riding on the motorcycle with me or having sex with me?" Their conversation ensued for approximately 40 minutes, during which the defendant and UC-2 discussed sexual contact with each other and a possible meeting. Excerpts from that conversation include:

09/28/2015 16:30:11 EDT	Moore	Nice, I wish I were there right now
09/28/2015 16:30:31 EDT	Moore	I'd carry you to your bedroom though
09/28/2015 16:30:39 EDT	Moore	Lay you down on the bed
09/28/2015 16:30:43 EDT	UC-2	Carry me? Lol
09/28/2015 16:30:47 EDT	UC-2	Oo
09/28/2015 16:31:05 EDT	Moore	Yes, carry you with your legs wrapped around me
9/28/2015 16:31:17 EDT	Moore	Kissing you along the way
09/28/2015 16:33:04 EDT	Moore	You cute young legs
09/28/2015 16:32:32 EDT	Moore	Once I laid you down on your bed, I would slip those shorts off of you
09/28/2015 16:32:57 EDT	Moore	And kiss my way up your legs
09/28/2015 16:35:27 EDT	UC-2	Do u really want to come see me?
09/28/2015 16:35:30 EDT	Moore	Have you ever fingered yourself?

09/28/2015 16:35:34 EDT	Moore	I do
09/28/2015 16:36:02 EDT	Moore	As soon as I have a free day
09/28/2015 16:37:28 EDT	UC-2	I want to meet u...just hope i dont bore u
09/28/2015 16:37:51 EDT	UC-2	I haven't done very much
09/28/2015 16:37:55 EDT	Moore	I can't imagine that
09/28/2015 16:38:06 EDT	Moore	That doesn't bother me
09/28/2015 16:38:15 EDT	UC-2	ur so nice
09/28/2015 16:38:30 EDT	Moore	It's nice of you to notice
09/28/2015 16:39:17 EDT	UC-2	I hope u hav a free day soon
09/28/2015 16:41:16 EDT	Moore	Me too, haha, but this damn summer and fall has been Awful
09/28/2015 16:42:15 EDT	UC-2	Ugh i hope i get to see u
09/28/2015 16:43:49 EDT	Moore	Breaks over

21. On October 5, 2015, at approximately 5:17 p.m., the defendant and UC-2 chatted via the Kik application. During this chat session, the defendant states “that works sucks today” and further informs UC-2 that he is “[s]itting at box office style booth checking ID’s for entrance into a building.” The defendant further asks what UC-2 is wearing and requests that UC-2 send him something “exciting.” The defendant tells UC-2 that he is wearing “black tactical pants, a long sleeve polo, and my vest.” At the defendant’s request, UC-2 sent the defendant a photograph of herself. This picture appears to depict a young teenage female holding a small cat.

22. On October 6, 2016, at approximately 7:37 p.m., the defendant and UC-2 chatted via the Kik application. During this chat session, the defendant states that he is getting ready to

zip up his pants after arriving home from work. The defendant sends UC-2 a picture of his lower body from the waist down, with his jeans unzipped. The defendant then asks UC-2 if she will “take a picture for me in your panties” if he “pushes [his] boxers down.” After UC-2 responds, “Yes maybe,” the defendant then sends a photograph depicting an adult male holding his underwear down below his exposed scrotum and erect penis. The chat then continued as follows:

10/06/2015 19:43:51 EDT	Moore	You like?
10/06/2015 19:44:48 EDT	UC-2	Yea lol
10/06/2015 19:45:07 EDT	Moore	What do you like about it?
10/06/2015 19:50:12 EDT	UC-2	Idk haha i haven't seen many
10/06/2015 19:57:14 EDT	Moore	I'm imagining you on your knees in front of me with you hand wrapped around it, staring at it, and looking up at me, and then putting it in your mouth
10/06/2015 19:58:44 EDT	Moore	Do you think it's big?
10/06/2015 19:58:07 EDT	UC-2	I'm nervous haha but excited
10/06/2015 20:01:15 EDT	Moore	Well go to your bedroom, or the bathroom, and take off your pants
10/06/2015 20:02:50 EDT	Moore	I do want pictures of you. As many as you will send me
10/06/2015 20:02:54 EDT	Moore	I love seeing you
10/06/2015 20:03:16 EDT	Moore	And I do want to come see you
10/06/2015 20:11:50 EDT	Moore	So what do you say, wanna show me something?
10/06/2015 20:13:16 EDT	UC-2	My mom is watching tv with me now but I'll try to sneak away nd send one

10/06/2015 20:14:29 EDT Moore I would suggest the bathroom, that's
an excusable place to go for a few
minutes

10/06/2015 20:48:12 EDT Moore I'm hard thinking about your body

8. On November 6, 2015, the defendant was arrested on charges stemming from his online enticement of UC-1/UC-2 as well as his sending of obscene material, namely a photo of his erect penis, to UC-1/UC-2 whom he believed to be a minor under the age of 16.

Facts related to Florida Charges (Case No. 16-60157-CR-HURLEY)

9. On or about April 27, 2016, a forensic examination of the defendant's iPhone 6 revealed that the defendant had been sending and receiving email communications using the email addresses trance5o@hotmail.com and shooterready9@gmail.com. Furthermore, forensic analysis revealed several email addresses in the contact portion of the phone. These email addresses had no name or phone number associated with them. Investigation revealed that one of the email addresses was being used by a minor female residing in the Broward County, Florida (hereinafter referred to as "Minor Victim-1.") The specific email address being used by Minor Victim-1 was her name followed by aol.com.

10. On March 1, 2014, between 12:35:48 a.m. UTC and 12:47:40 a.m. UTC, emails between email account shooterready9@gmail.com belonging to the defendant and Minor Victim-1 were exchanged. One of the emails sent from Minor Victim-1's email to the defendant's email appeared to have a photograph attached to it. However, the content of this image was not viewable on the device.

11. Through Delaware Department of Justice subpoenas sent to AOL relating to the email address belonging to Minor Victim-1, law enforcement identified the user of this email as a

17-year-old minor residing in Coconut Creek, Florida who was attending a local high school.

12. On December 15, 2015, HSI Special Agents interviewed Minor Victim-1, who was in fact residing in Coconut Creek, Florida. Minor Victim-1 acknowledged using the email address referred to above containing her full name followed by aol.com. Minor Victim-1 stated that she met the defendant on the social media application Kik when she was approximately 15 or 16 years old. Minor Victim-1 remembered using her actual age on her Meet24 and Kik profile pages. She further stated that she remembered communicating with the defendant using various forms of online communication, including Kik and Meet24. Minor Victim-1 informed law enforcement that the defendant sent her images of himself which depicted his unclothed genitals, and that, upon the defendant's request, Minor Victim-1 sent several images of herself, which depicted her unclothed genitals to the defendant using various forms of online communication, including Kik and Meet24.

13. Later, Minor Victim-1 voluntarily consented to a review of her Meet24 account by law enforcement. Minor Victim-1 identified on her phone private messages she exchanged using the online social media application Meet24, specifically those that she exchanged with the user "Rob" (the defendant) between January and April of 2014. On several occasions, the defendant sent images of his exposed, erect penis to Minor Victim-1's Meet24 account. Furthermore, on January 11, 2014, the following chat ensued:

Moore	2014-01-11 22:55:41.0	do you remember where we were?
MV-1	2014-01-11 22:55:55.0	not exactly
Moore	2014-01-11 22:57:36.0	talking about us kissing, and me laying between your legs
MV-1	2014-01-11 22:59:04.0	oh I see

Moore	2014-01-11 22:59:45.0	still wearing sweats?
MV-1	2014-01-11 22:59:55.0	no lol
Moore	2014-01-11 23:00:19.0	what are you wearing?
MV-1	2014-01-11 23:00:27.0	shorts and a tshirt
Moore	2014-01-11 23:00:59.0	even better
Moore	2014-01-11 23:01:14.0	nice bare legs for me to feel
Moore	2014-01-11 23:02:57.0	are you wearing panties under the shorts?
MV-1	2014-01-11 23:04:47.0	no.
Moore	2014-01-11 23:05:25.0	mmm
Moore	2014-01-11 23:05:45.0	I want to take them off you
Moore	2014-01-11 23:06:32.0	I grab them with my hands and pull lightly down....just an inch
Moore	2014-01-11 23:09:56.0	I pull them further down....
Moore	2014-01-11 23:10:43.0	almost revealing you...
Moore	2014-01-11 23:16:19.0	can I keep going?
MV-1	2014-01-11 23:16:23.0	yes
Moore	2014-01-11 23:16:52.0	I pull them down your thighs, over your knees, and off your legs
Moore	2014-01-11 23:17:23.0	I kiss your calves, and work my way up
Moore	2014-01-11 23:17:46.0	kissing your inner thighs, rubbing your legs with my hands
Moore	2014-01-11 23:19:02.0	I push your legs apart. look you in the eye, and place my tongue on your pussy
Moore	2014-01-11 23:19:47.0	I part your lips with my tongue. and reach

		inside you
MV-1	2014-01-11 23:21:00.0	I let out a small whimper, and grip your hair
Moore	2014-01-11 23:21:36.0	I push my tongue deep inside you and lick strong licks
Moore	2014-01-11 23:21:49.0	my hands pin your legs open
Moore	2014-01-11 23:23:09.0	I lick faster, and add a finger
Moore	2014-01-11 23:23:38.0	your young pussy tastes sooo good
MV-1	2014-01-11 23:27:32.0	mmmmm you like young pussy?
Moore	2014-01-11 23:27:44.0	I put two fingers inside you and lick your clit
Moore	2014-01-11 23:27:53.0	I love young pussy
Moore	2014-01-11 23:28:40.0	you're so wet
Moore	2014-01-11 23:28:59.0	and I am so hard
MV-1	2014-01-11 23:29:49.0	I start moaning like crazy, begging you for more
Moore	2014-01-11 23:30:29.0	I speed up finger fucking you
MV-1	2014-01-11 23:32:04.0	your legs wiggle around my head
Moore	2014-01-11 23:32:23.0	my cock is aching to get in on the action
Moore	2014-01-11 23:34:49.0	I pull my hand away from your pussy and climb up between your legs, my hard cock inches from your young tight pussy
Moore	2014-01-11 23:35:51.0	take me in your hand, hold it
Moore	2014-01-11 23:37:26.0	I put the tip down at your entrance
Moore	2014-01-11 23:37:38.0	are you ready for this?
Moore	2014-01-11 23:41:56.0	I push the tip of my cock inside you

Moore	2014-01-11 23:43:28.0	I push just a few inches inside you to wet my cock with your juices...and gently move it in and out
Moore	2014-01-11 23:45:51.0	I give you a couple more inches, and feel resistance....you're very tight. are you a virgin?
Moore	2014-01-11 23:47:45.0	I keep pressing into you, hard
Moore	2014-01-11 23:49:47.0	I am almost all the way inside you
Moore	2014-01-11 23:53:10.0	fuck
Moore	2014-01-11 23:55:13.0	I'm all the way inside
Moore	2014-01-11 23:55:38.0	I can feel your inexperienced pussy quivering beneath me

On January 14, 2014, the following chat ensued:

Moore	2014-01-14 16:33:48.0	does your microphone work?
MV-1	2014-01-14 16:34:02.0	Uhm yes
Moore	2014-01-14 16:34:31.0	can you voice me something hot, like telling me how you think it'll feel when I fuck you
Moore	2014-01-14 16:36:16.0	[The defendant sends audio file]
MV-1	2014-01-14 16:36:18.0	can I do that another time? I'm not alone
Moore	2014-01-14 16:36:28.0	absolutely
Moore	2014-01-14 16:36:46.0	are you with a girl?
MV-1	2014-01-14 16:36:53.0	no lol
MV-1	2014-01-14 16:36:58.0	I'm home
MV-1	2014-01-14 16:36:59.0	I'm home
Moore	2014-01-14 16:37:05.0	parents?

MV-1	2014-01-14 16:37:10.0	yeah
Moore	2014-01-14 16:37:18.0	ahh, yeah don't play mine
MV-1	2014-01-14 16:37:33.0	haha what does it say?
Moore	2014-01-14 16:37:53.0	I just say I want to hear your sexy voice
MV-1	2014-01-14 16:38:19.0	ah okay
Moore	2014-01-14 16:38:32.0	I'm going to send you one more for you to listen to later
MV-1	2014-01-14 16:38:43.0	okay :3
Moore	2014-01-14 16:39:32.0	The Defendant sends audio file
Moore	2014-01-14 16:40:01.0	The Defendant sends audio file
Moore	2014-01-14 16:40:44.0	ok, I am rock hard now thinking about it, I want to save this for later when you are free to talk
MV-1	2014-01-14 16:41:00.0	oh okay
Moore	2014-01-14 16:43:20.0	did you get turned on by that convo?
MV-1	2014-01-14 16:44:13.0	yes I did
Moore	2014-01-14 16:44:20.0	wet?
Moore	2014-01-14 16:44:21.0	wet?
MV-1	2014-01-14 16:44:37.0	a little
Moore	2014-01-14 16:45:02.0	give your pussy a discrete squeeze for me, imagine it is my hand
MV-1	2014-01-14 16:46:02.0	yes sir
Moore	2014-01-14 16:46:35.0	good girl
Moore	2014-01-14 16:48:12.0	are you able to excuse yourself to go to the

		bathroom?
MV-1	2014-01-14 16:52:18.0	yes?
Moore	2014-01-14 16:52:39.0	are you there?
Moore	2014-01-14 16:52:49.0	alone in the bathroom?
MV-1	2014-01-14 16:53:16.0	yes..
Moore	2014-01-14 16:53:44.0	pull your panties down and put a finger inside. imagine it is me
Moore	2014-01-14 16:54:47.0	would you take a picture? Preferably down there but of your open mouth would be nice too
Moore	2014-01-14 17:03:19.0	nervously awaiting a response
MV-1	2014-01-14 17:03:52.0	a finger? or normal?
Moore	2014-01-14 17:05:14.0	whatever you want
Moore	2014-01-14 17:05:35.0	I'd love to see your pussy
MV-1	2014-01-14 17:12:19.0	did that send?
Moore	2014-01-14 17:12:32.0	no, try again
MV-1	2014-01-14 17:12:53.0	MV-1 sends a pic (law enforcement has so far been unable to retrieve but MV-1 stated that she took a picture of her naked vagina and sent it to the defendant at his request.)
Moore	2014-01-14 17:13:40.0	mmmm
Moore	2014-01-14 17:14:21.0	very nice
Moore	2014-01-14 17:14:50.0	anything else?
MV-1	2014-01-14 17:15:09.0	what else is there lol
Moore	2014-01-14 17:15:18.0	your tongue

MV-1	2014-01-14 17:17:20.0	lil busy now I will later
Moore	2014-01-14 17:17:39.0	alright
Moore	2014-01-14 17:17:44.0	I will also ttyl
MV-1	2014-01-14 17:22:41.0	okay

14. The communications between the defendant and Minor Victim-1 occurred using cell phones and the internet, both of which are facilities of interstate commerce. Minor Victim-1 was located in the Southern District of Florida during the time that the defendant enticed her. The defendant was located outside of the Southern District of Florida at all times during their conversations, namely in the District of Columbia as well as the District of Maryland.

Facts related to additional uncharged online enticement of minors

15. A subsequent search warrant for the contents of the defendant's Meet24 account revealed additional similar chats that the defendant engaged in with other minor females. For example, on January 8, 2014, the defendant began a conversation with a 14-year-old minor female located in the Northern District of Texas (hereinafter "Minor Victim-2"), whose age was clearly visible on her profile page. Indeed, within the first five minutes of the conversation, the defendant asked Minor Victim-2, "it doesn't bother you that I am 30 does it?" Similarly, a few minutes later, the defendant said, "I just didn't want you to think it was weird that I was into Who and wanted to talk to a 14 yr old about it." Additionally, about a month after they first began communicating, on February 7, 2014, the defendant continued the grooming process by again referencing Minor Victim-2's age when he compared photos of her with her friend by saying "she doesn't look as mature as you though" and "you look 17, not 14." A few days later, on February 12, 2014, the defendant explained to MV-2 that he was "a cop" and a "federal officer to be

specific.” MV-2 replied “and your talking to a child,” to which the defendant quipped, “like the Rolling Stones sang ‘every cop is a criminal.’”

16. Within a few days of their first chat, the defendant began turning the conversation sexual. For example, on January 13, 2014, the defendant told Minor Victim-2, “I would love to see you in thigh high socks and a short skirt.” By January 16, 2014, the following conversation ensued:

Moore	1/15/2014 21:46	going to bed, g'night :*:]
MV-2	1/15/2014 22:44	goodnight
Moore	1/16/2014 17:31	you are a unicorn :)
MV-2	1/16/2014 17:31	yush haha
Moore	1/16/2014 17:31	:\$
MV-2	1/16/2014 17:32	c:
Moore	1/16/2014 17:32	side note: do you know the urban dictionary definition of a unicorn?
MV-2	1/16/2014 17:32	no
Moore	1/16/2014 17:33	a bisexual girl who will go home with a couple
Moore	1/16/2014 17:33	a couple who hit on women looking for such a girl are called unicorn hunters
MV-2	1/16/2014 17:34	0.0.
Moore	1/16/2014 17:34	what does that face mean? are your eyes bugging out?
MV-2	1/16/2014 17:35	yush
Moore	1/16/2014 17:36	I only know this because I have done unicorn hunting

Moore	1/16/2014 17:36	and a unicorn told me I was a unicorn hunter
Moore	1/16/2014 17:37	after she came home with me and my girlfriend at the time
MV-2	1/16/2014 17:37	da fuckkkk 0///0
Moore	1/16/2014 17:37	over share?
MV-2	1/16/2014 17:37	yes (/_\)
Moore	1/16/2014 17:38	sorry
Moore	1/16/2014 17:38	that is as depraved as I get
Moore	1/16/2014 17:38	so no more shockers
MV-2	1/16/2014 17:39	childhood ruuuuuinnnnneeeedddd!!!!!!!!!!!! DX

17. The defendant continued chatting with Minor Victim-2 on a nearly daily basis between January and April 2014. The defendant continuously turned the conversation to sexual topics. For example, on January 16, 2014, the defendant said, “don’t forget, I may be a guy, and I may have the hots for you, but I also know a lot of things.” On January 21, 2014, Minor Victim-2 told the defendant that she had “self harmed” in the past by “slic[ing] my skin.” A few days later, on January 29, 2014, the defendant again engaged enticed Minor Victim-2 into sexual dialogue:

Moore	1/29/2014 19:52	and I know at some point I would reach over and lay my hand just above your knee
MV-2	1/29/2014 19:53	my leg would probably be shaking
Moore	1/29/2014 19:54	I would rub it press it down try to massage the jitters out of you
MV-2	1/29/2014 19:55	I would probably scoot closer to you

Moore	1/29/2014 19:56	and put my hand slipped higher up on your thigh?
MV-2	1/29/2014 19:57	huh
Moore	1/29/2014 19:57	sorry, and when my hand slipped higher up on your thigh
Moore	1/29/2014 19:57	it would be rubbing your midthigh
MV-2	1/29/2014 19:59	*i would probably just look down at your hand*
Moore	1/29/2014 20:00	then I would probably look at you and keep sliding it up
Moore	1/29/2014 20:00	until my fingers brushed against your panties
MV-2	1/29/2014 20:01	honestly id probably move it back down*
Moore	1/29/2014 20:03	I would ask you "too fast?"
Moore	1/29/2014 20:03	but I would not remove my hand from your thigh
Moore	1/29/2014 20:03	I would just keep rubbing where you pushed back down to
MV-2	1/29/2014 20:06	I'd blush and say "a little"
Moore	1/29/2014 20:07	[The defendant sent an audio file]
Moore	1/29/2014 20:07	[The defendant sent an audio file]
MV-2	1/29/2014 20:08	I'd probably just stare at you then kiss you
Moore	1/29/2014 20:09	I would just enjoy making out with you for a good long while
MV-2	1/29/2014 20:09	I'd smack you then say drive!
Moore	1/29/2014 20:11	I might just jump over in the passenger seat on top of you and keep kissing you
MV-2	1/29/2014 20:12	I would literally
MV-2	1/29/2014 20:12	hit you

18. About 20 minutes later, undeterred, the defendant asked Minor Victim-2 “you thinking about me fingering you and you moaning” and Minor Victim-2 responded, “haha nah lol.”

19. A few days later, on February 4, 2014, the defendant once again continued the enticement and tried to escalate the exchange. Specifically, Minor Victim-2 sent a photo of herself wearing sweatpants and a shirt. The defendant said, “love the shirt” and “I wouldn’t have pictured you wearing sweatpants to school in 13 deg weather.” The defendant then asked, “what’s under them?” When Minor Victim-2 responded simply, “underwear,” the defendant said “prove it.” The chat logs reveal that Minor Victim-2 then sent a photo of some kind, but the photo is not viewable. However, the defendant then responded, “damn nice” and “you have a sexy stomach.” When Minor Victim-2 replied, “thanks,” the defendant continued, “I’d love to rub it with my hand before I slip it down into those hot blue panties.”

20. The next day, on February 5, 2014, after additional exchanges, the defendant again said, “I’ve got my hard cock out, looking at your gorgeous body.” If Minor Victim-2 were called to testify at trial, she would explain that, at the defendant’s request, she sent him multiple photos of herself in various stages of undress, including photos of her pubic area, and that the defendant consistently tried to get her to take more explicit photos. In fact, on February 26, 2014, the defendant continued to try to get Minor victim-2 to send him illicit photos of herself:

Moore	2/26/2014 21:15	getting ready for bed :p
MV-2	2/26/2014 21:15	me too
Moore	2/26/2014 21:16	mmmm, you in PJs, yum
MV-2	2/26/2014 21:16	me in a tshirt and sweats

Moore	2/26/2014 21:16	to shirt and just panties would be better
MV-2	2/26/2014 21:17	I feel awkward like that
Moore	2/26/2014 21:17	you would look hot like that
MV-2	2/26/2014 21:18	I would freeze to death
Moore	2/26/2014 21:22	just long enough for a picture ;)
Moore	2/26/2014 21:23	I want good dreams tonight :)
MV-2	2/26/2014 21:25	no
Moore	2/26/2014 21:27	boo
Moore	2/26/2014 21:28	well will you resend that one of you in bra and panties? so I don't have to scroll up for 10 minutes
Moore	2/26/2014 21:33	Nevermind, I got it already
Moore	2/26/2014 21:34	mmmm fuck yeah
Moore	2/26/2014 21:36	I would drive all night just to be able to pull those panties off you
MV-2	2/26/2014 21:38	honestly I'd never let you touch me

21. From January 13, 2014 to March 23, 2014, the defendant engaged in similar online enticement with another 17-year-old female (hereafter referred to as “Minor Victim-3”). For example, a mere two days after their first communication, the defendant referenced some photos of Minor Victim-3 that she had posted to her Meet24 profile page by saying “looking down at you, with you looking up with your mouth open and tongue stuck out? I hope this doesn't offend you, but I think about you giving me head.” The defendant then encouraged Minor Victim-3 to engage in a conversation about the two of them having sex. The conversation was extremely explicit and the defendant controlled the conversation, often with little input from Minor Victim-3. For

example, the conversation began as follows:

MV-3	1/15/2014 11:58	lol what do you want to talk about?
Moore	1/15/2014 12:02	being in your room ;)
MV-3	1/15/2014 12:02	doin what? ;p
Moore	1/15/2014 12:03	locking the door
MV-3	1/15/2014 12:04	and then?
Moore	1/15/2014 12:06	walking over to you
MV-3	1/15/2014 12:07	and? ;3
Moore	1/15/2014 12:07	taking my shirt off and laying down on you, and kissing you
MV-3	1/15/2014 12:08	hehe
Moore	1/15/2014 12:09	and this makes you laugh
MV-3	1/15/2014 12:09	no it makes me giggle
MV-3	1/15/2014 12:09	big differents
Moore	1/15/2014 12:10	good ;)
Moore	1/15/2014 12:11	and then my hands would push your knees apart so I would lay between your legs

22. A few days later, on January 21, 2014, the defendant said to Minor Victim-3, “I have a hypothetical? would you be more excited if I were fucking you in your bedroom while your parents were home and we might get caught, or in public where we might get caught?” The defendant then commented, “love that you're 17, also a huge turn on.” The defendant further said, “god damn I so badly want to stare into your eyes the first time I put it all the way inside you” and “I would have to focus not to cum too fast in your tight young pussy.” A few minutes later,

at the defendant's request, Minor Victim-3 sent a close-up photo of her vagina. Less than a minute later, the defendant encouraged her to send him more photos by saying "nice...you should do one with your fingers spreading your lips away."

23. Just as with Minor Victim-2, the defendant also told Minor Victim-3 that he was a "federal officer in DC" after sending her a photograph of himself in uniform with a gun.

24. The foregoing events occurred in the Southern District of Florida, the District of Delaware and elsewhere.

Date: 3-1-17

WIFREDO A. FERRER
UNITED STATES ATTORNEY
By: Corey Steinberg
Corey Steinberg
Assistant United States Attorney

Date: 3/1/2017

By: Austin M. Berry
Austin M. Berry
Child Exploitation and Obscenity Section
Department of Justice

Date: 3/1/17

By: Bruce H. Lehr
Bruce H. Lehr
Attorney for Defendant

Date: 3-1-17

By: Lee Robert Moore
Lee Robert Moore
Defendant