

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term
Grand Jury Sworn in on November 15, 2007

UNITED STATES OF AMERICA,	:	CRIMINAL NO.
	:	
v.	:	VIOLATIONS:
	:	
	:	18 U.S.C. § 1465
	:	(Transportation of Obscene
JOHN STAGLIANO	:	Matters for Sale or Distribution)
JOHN STAGLIANO, INC.	:	18 U.S.C. § 1462
EVIL ANGEL PRODUCTIONS, INC.	:	(Using a Common Carrier or Interactive
	:	Computer Service to Transport Obscene
	:	Matters)
Defendants.	:	18 U.S.C. § 1466 (Engaging in the Business
	:	of Selling or Transferring Obscene Matter)
	:	47 U.S.C. § 223(d)
	:	(Sending or Displaying Offensive Material
	:	to Persons Under 18
	:	18 U.S.C. § 2 (Aiding and Abetting)
	:	18 U.S.C. § 1467
	:	(Criminal Forfeiture)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

On or about December 19, 2007, in the District of Columbia and elsewhere, defendants **JOHN STAGLIANO, JOHN STAGLIANO, INC., and EVIL ANGEL PRODUCTIONS, INC.**, aided and abetted by each other, did knowingly transport obscene matter, in and affecting interstate commerce, for the purpose of selling and distributing said obscene matter, that is, a motion-picture film identified as "MILK NYMPHOS," in violation of Title 18, United States Code, Sections 1465 and 2(a).

COUNT TWO

On or about December 19, 2007, in the District of Columbia and elsewhere, defendants **JOHN STAGLIANO, JOHN STAGLIANO, INC., and EVIL ANGEL PRODUCTIONS, INC.,** aided and abetted by each other, did knowingly transport obscene matter, in and affecting interstate commerce, for the purpose of selling and distributing said obscene matter, that is, a motion-picture film identified as “STORM SQUIRTERS 2 ‘TARGET PRACTICE’,” in violation of Title 18, United States Code, Sections 1465 and 2(a).

COUNT THREE

On or about December 19, 2007, in the District of Columbia and elsewhere, defendants **JOHN STAGLIANO, JOHN STAGLIANO, INC., and EVIL ANGEL PRODUCTIONS, INC.,** aided and abetted by each other, did knowingly use an interactive computer service and other facilities and means, in and affecting interstate commerce, for the purpose of distributing obscene matter, that is, a motion-picture trailer identified as “FETISH FANATIC CHAPTER 5,” in violation of Title 18, United States Code, Sections 1465 and 2(a).

COUNT FOUR

On or about December 19, 2007, in the District of Columbia and elsewhere, defendants **JOHN STAGLIANO, JOHN STAGLIANO, INC., and EVIL ANGEL PRODUCTIONS, INC.,** aided and abetted by each other, did knowingly use an express company or other common carrier for carriage in interstate commerce and delivery from California to a location inside the District of Columbia, a package that contained an obscene motion-picture film, “MILK NYMPHOS” in violation of Title 18, United States Code, Sections 1462 and 2(a).

COUNT FIVE

On or about December 19, 2007, in the District of Columbia and elsewhere, defendants **JOHN STAGLIANO, JOHN STAGLIANO, INC., and EVIL ANGEL PRODUCTIONS, INC.**, aided and abetted by each other, did knowingly use an express company or other common carrier for carriage in interstate commerce and delivery from California to a location inside the District of Columbia, a package that contained an obscene motion-picture film, "STORM SQUIRTERS 2 'TARGET PRACTICE' " in violation of Title 18, United States Code, Sections 1462 and 2(a).

COUNT SIX

On or about December 19, 2007, in the District of Columbia and elsewhere, defendants **JOHN STAGLIANO, JOHN STAGLIANO, INC., and EVIL ANGEL PRODUCTIONS, INC.**, aided and abetted by each other, while engaged in the business of selling and transferring obscene matter, did knowingly possess with the intent to distribute obscene motion-picture films, that is "MILK NYMPHOS," STORM SQUIRTERS 2 'TARGET PRACTICE,'" and "FETISH FANATIC CHAPTER 5," which had been shipped and transported in interstate commerce in violation of Title 18, United States Code, Sections 1466 and 2(a).

COUNT SEVEN

On or about January 21, 2008, in the District of Columbia and elsewhere, defendants **JOHN STAGLIANO, JOHN STAGLIANO, INC., and EVIL ANGEL PRODUCTIONS, INC.**, aided and abetted by each other, knowingly used an interactive computer service to display an obscene image, that is, a motion-picture trailer identified as "FETISH FANATIC CHAPTER 5," in a manner available to a person under 18 years of age in violation of Title 47, United States Code, Sections 223(d) and 2(a).

FORFEITURE ALLEGATION

1. The allegations of Counts One to Seven of this Indictment are re-alleged and incorporated by reference as if fully restated here for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1467.

2. As a result of the violations of Title 18, United States Code, Sections 1462, 1465, 1466, defendants **JOHN STAGLIANO, JOHN STAGLIANO, INC., and EVIL ANGEL PRODUCTIONS, INC.** shall forfeit to the United States, pursuant to title 18, United States Code, Section 1467, all obscene material produced, transported, mailed, shipped and received, and all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s), and all property, real or personal, used or intended to be used to commit or to promote the commission of such offenses.

3. The property to be forfeited includes, but is not limited to, the following:

(a) All original masters and all copies of the motion-picture films, "Milk Nymphos," "Storm Squirters 2 'Target Practice,' " and "Fetish Fanatic Chapter 5."

(b) Gross profits from the sale of obscene material, to wit: "Milk Nymphos," "Storm Squirters 2 'Target Practice,' " and "Fetish Fanatic Chapter 5."

(c) Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses listed in Counts One through Seven of the Indictment, including, but not limited to, ownership and rights to the following domain names and websites: www.evilangel.com and www.evilangeldirect.com.

4. To the extent that the property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 1467, 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 to, sold to, or deposited with a third person;
- (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 that cannot be subdivided without difficulty, the United States shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), incorporated by Title 18, United States Code, Section 1467(b) and Title 28, United States Code, Section 2461(c).


All pursuant to 18 United States Code, Section 1467 and 28 United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON.

JEFFREY A. TAYLOR
United States Attorney
for the District of Columbia

BRENT D. WARD
Director, Obscenity Prosecution Task Force
United States Department of Justice, Criminal Division

By: 
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