

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA

vs.

RICHARD CHANNING SHEALY

CRIMINAL NO.

18 U.S.C. §2251(a)

18 U.S.C. §2251(e)

18 U.S.C. §2252A(a)(2)

18 U.S.C. §2252A(a)(5)(B)

18 U.S.C. §2252A(b)(1)

18 U.S.C. §2252A(b)(2)

18 U.S.C. §2253

28 U.S.C. §2461(c)

INDICTMENT

BACKGROUND

At all times material to this Indictment:

1. The Defendant, **RICHARD CHANNING SHEALY**, resided in the District of South Carolina in Lexington, South Carolina.

2. The Defendant, **RICHARD CHANNING SHEALY**, owned and operated an internet account with Charter Communications, bearing an Internet Protocol ("IP") address of 75.176.108.151 ("Charter account"). The service address and billing address for the Charter account is the home address of **RICHARD CHANNING SHEALY** in Lexington, South Carolina.

3. Minor Victim 1 (MV-1) is a person known to the Grand Jury and a person who the Defendant, **RICHARD CHANNING SHEALY**, had access to.

4. The Defendant, **RICHARD CHANNING SHEALY**, created and operated an account on the eDonkey network, a peer-to-peer file sharing network known to the Grand Jury,

with a username known to the Grand Jury (“Shealy account”) and he possessed and used a particular computer known to the Grand Jury (“Shealy Computer”), both of which he used to facilitate the sexual exploitation of a minor and child pornography offenses described in this indictment.

COUNT ONE

(Sexual Exploitation of a Minor)

THE GRAND JURY CHARGES:

5. That on or about March 6, 2004 in the District of South Carolina, and elsewhere, the Defendant, **RICHARD CHANNING SHEALY**, did knowingly employ, use, persuade, induce, entice, and coerce a minor, namely MV-1, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce specifically, the Defendant, **RICHARD CHANNING SHEALY**, knowingly employed, used, persuaded, induced, enticed, and coerced MV-1 to engage in sexually explicit conduct for the purpose of producing an image file ending in “f082”;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

(Sexual Exploitation of a Minor)

THE GRAND JURY FURTHER CHARGES:

6. That on or about November 4, 2004 in the District of South Carolina, and elsewhere, the Defendant, **RICHARD CHANNING SHEALY**, did knowingly employ, use, persuade, induce, entice, and coerce a minor, namely MV-1, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce specifically, the Defendant, **RICHARD CHANNING SHEALY**, knowingly employed, used, persuaded, induced, enticed, and coerced MV-1 to engage in sexually explicit conduct for the purpose of producing an image file ending in "3966";

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT THREE

(Sexual Exploitation of a Minor)

THE GRAND JURY FURTHER CHARGES:

7. That on or about March 12, 2006 in the District of South Carolina, and elsewhere, the Defendant, **RICHARD CHANNING SHEALY**, did knowingly employ, use, persuade, induce, entice, and coerce a minor, namely MV-1, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce specifically, the Defendant, **RICHARD CHANNING SHEALY**, knowingly employed, used, persuaded, induced, enticed, and coerced MV-1 to engage in sexually explicit conduct for the purpose of producing an image file ending in "3ee8";

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FOUR

(Sexual Exploitation of a Minor)

THE GRAND JURY FURTHER CHARGES:

8. That on or about May 14, 2006 in the District of South Carolina, and elsewhere, the Defendant, **RICHARD CHANNING SHEALY**, did knowingly employ, use, persuade, induce, entice, and coerce a minor, namely MV-1, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce specifically, the Defendant, **RICHARD CHANNING SHEALY**, knowingly employed, used, persuaded, induced, enticed, and coerced MV-1 to engage in sexually explicit conduct for the purpose of producing an image file ending in "8814";

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FIVE

(Distribution of Child Pornography)

THE GRAND JURY FURTHER CHARGES:

9. That on or about February 19, 2026, in the District of South Carolina, the Defendant, **RICHARD CHANNING SHEALY**, did distribute child pornography and materials that contained child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer; specifically, the Defendant, **RICHARD CHANNING SHEALY**, sent an image file ending in "D974" using the eDonkey application to another user of the eDonkey application known to the Grand Jury who downloaded the image from the Shealy Account;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and 2252A(b)(1).

COUNT SIX

(Distribution of Child Pornography)

THE GRAND JURY FURTHER CHARGES:

10. That on or about February 19, 2026, in the District of South Carolina, the Defendant, **RICHARD CHANNING SHEALY**, did distribute child pornography and materials that contained child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer; specifically, the Defendant, **RICHARD CHANNING SHEALY**, sent an image file ending in "027D" using the eDonkey application to another user of the eDonkey application known to the Grand Jury who downloaded the image from the Shealy Account;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and 2252A(b)(1).

COUNT SEVEN

(Distribution of Child Pornography)

THE GRAND JURY FURTHER CHARGES:

11. That on or about February 20, 2026, in the District of South Carolina, the Defendant, **RICHARD CHANNING SHEALY**, did distribute child pornography and materials that contained child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer; specifically, the Defendant, **RICHARD CHANNING SHEALY**, sent an image file ending in "3BBA" using the eDonkey application to another user of the eDonkey application known to the Grand Jury who downloaded the image from the Shealy Account;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and 2252A(b)(1).

COUNT EIGHT

(Distribution of Child Pornography)

THE GRAND JURY FURTHER CHARGES:

12. That on or about February 23, 2026, in the District of South Carolina, the Defendant, **RICHARD CHANNING SHEALY**, did distribute child pornography and materials that contained child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer; specifically, the Defendant, **RICHARD CHANNING SHEALY**, sent an image file ending in "5302" using the eDonkey application to another user of the eDonkey application known to the Grand Jury who downloaded the image from the Shealy Account;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and 2252A(b)(1).

COUNT NINE

(Possession of Child Pornography Involving a Prepubescent Minor)

THE GRAND JURY FURTHER CHARGES:

13. Beginning at a date unknown but continuing until on or about March 27, 2026, in the District of South Carolina, and elsewhere, the Defendant, **RICHARD CHANNING SHEALY**, did knowingly possess materials that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor, that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer, and that were produced using materials that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

FORFEITURE

SEXUAL EXPLOITATION OF CHILDREN:

Upon conviction for violation of Title 18, United States Code, Sections 2251 and 2252A, as charged in this Indictment, the Defendant, **RICHARD CHANNING SHEALY**, shall forfeit to the United States his interest in:

- i. any visual depiction described in section 2252A of chapter 110 of the United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of chapter 110 of the United States Code;
- ii. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and
- iii. any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses.

PROPERTY:

The property subject to forfeiture pursuant to Title 18, United States Code, Section 2253, and Title 28, United States Code, Section 2461(c), includes, but is not limited to, the following:

Electronics:

- (1) YXK Mini Personal Computer
- (2) Western Digital External Solid State Drive
- (3) Custom Computer Tower

Proceeds/Forfeiture Judgment:

A sum of money equal to all proceeds the Defendant obtained, directly or indirectly, from the offenses charged in this Indictment, and all interest and proceeds traceable thereto, and/or such sum that equals all property derived from or traceable to his violations of Title 18.

SUBSTITUTE ASSETS:

If any of the property described above, 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 18 U.S.C. § 982(b)(1) to seek forfeiture of any other property of the Defendant up to an amount equivalent to the value of the above-described forfeitable property.

All pursuant to Title 18, United States Code, Section 2253, and Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

BRYAN P. STIRLING
UNITED STATES ATTORNEY

By: Scott Matthews

J. Scott Matthews (Fed ID#13779)

Assistant U.S. Attorney

1441 Main Street, Suite 500

Columbia, South Carolina 29201

Tel: 803-929-3000

Email: jonathan.matthews2@usdoj.gov

RECORD OF GRAND JURY BALLOT

C/R 3:26cr953

UNITED STATES OF AMERICA v. RICHARD CHANNING SHEALY
(SEALED UNTIL FURTHER ORDER OF THE COURT)