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## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

2024 APR -8 AM 9: 45

U.S. DISTRICT COURT SOUTHT BU DIST. OHIO LAST. TO UMBUS

UNITED STATES OF AMERICA,

Plaintiff,

v.

RONALD P. BEDRA,

Defendant.

PLEA AGREEMENT

The United States Department of Justice, Environment and Natural Resources Division, and the United States Attorney's Office for the Southern District of Ohio (collectively the "Government" or the "United States"), and the Defendant, **RONALD P. BEDRA**, individually and through counsel, pursuant to Rule 11(c)(1)(A) of the Federal Rules of Criminal Procedure, agree as follows:

- 1. Offenses of Conviction: The Defendant agrees to waive indictment and plead guilty to the Information charging him with one count of conspiracy, in violation of 18 U.S.C. § 371 (relating to the creation and distribution of animal crush videos), and one count of distribution of animal crush videos, in violation of 18 U.S.C. § 48(a)(3), and will not withdraw or attempt to withdraw his plea. The Defendant admits that he is, in fact, guilty of these offenses and will so advise the Court.
- 2. <u>Elements</u>: The elements of Count 1, Conspiracy in violation of <u>18 U.S.C.</u> § 371, are as follows:

First: two or more persons conspired, or agreed, to commit an offense against the United States, namely the creation and distribution of animal crush videos, in violation of 18 U.S.C. §§ 48(a)(2) and 48(a)(3);

Second: the defendant knowingly and voluntarily joined the conspiracy; and

Third: a member of the conspiracy did at least one of the overt acts described in the Information for the purpose of advancing or helping the conspiracy.

The elements of Count 2, Distribution of Animal Crush Videos in violation of 18 U.S.C. § 48(a)(3), are as follows:

First: the defendant knowingly sold, marketed, advertised, exchanged, or distributed:

Second: an animal crush video, that is, a video that a) depicted serious bodily injury or aggravated sexual assault of an animal, and b) was obscene;

Third: in, or using a means or facility of, interstate or foreign commerce.

- 3. <u>Venue</u>: The Defendant agrees that the offenses occurred, in whole or in part, in the Southern District of Ohio on or around the dates alleged in the Information.
- 4. **Penalties:** The statutory penalties for Count 1 are as follows:
  - a) A term of imprisonment of not more than five years;
  - b) A fine not to exceed \$250,000;
  - c) A term of supervised release of not more than three years; and
  - d) A mandatory special assessment of \$100.00 pursuant to 18 U.S.C. § 3013.

The statutory penalties for Count 2 are as follows:

- a) A term of imprisonment of not more than seven years;
- b) A fine not to exceed \$250,000;
- c) A term of supervised release of not more than three years; and
- d) A mandatory special assessment of \$100.00 pursuant to 18 U.S.C. § 3013.
- 5. Waiver of Rights: The Defendant understands that he has the following rights:
  - a) To be charged by indictment by a grand jury;
  - b) To plead not guilty;
  - c) To have a trial by jury;
  - d) To be assisted by counsel during such trial;
  - e) To confront and cross-examine adverse witnesses;
  - f) To testify, if so desired, and to present evidence and compel the attendance of witnesses;
  - g) To not be compelled to testify or present evidence, and to not have these decisions held against the Defendant; and
  - h) To be presumed innocent throughout trial and until a jury finds proof of guilt beyond a reasonable doubt.

The Defendant further understands that if the Court accepts his guilty plea pursuant to this Plea Agreement, there will be no trial and he waives these rights.

- 6. Applicability of Advisory Sentencing Guidelines: The Defendant understands that in determining a sentence, the Court has an obligation to calculate the applicable advisory sentencing guideline range and to consider that range, possible departures under the United States Sentencing Guidelines (U.S.S.G.), and other sentencing factors under 18 U.S.C. § 3553(a).
- 7. Factual and Sentencing Guidelines Stipulation: The parties agree to the Statement of Facts set forth in Attachment A and incorporate it here by reference. The parties further agree that the Statement of Facts is accurate and provides a sufficient factual basis for the Defendant's plea. The parties further agree to the following advisory sentencing guidelines factors:

The parties agree that the base offense level for the crimes to which the Defendant is pleading guilty is 10 pursuant to U.S.S.G. § 2G3.1(a).

Further, the parties agree to recommend the following enhancements under the sentencing guidelines:

-	<u>U.S.S.G.</u> § 2G3.1(b)(1)(B)	+5 (distribution for valuable consideration)
_	<u>U.S.S.G. § 2G3</u> .1(b)(3)	+2 (use of a computer or interactive computer service)
_	U.S.S.G. § 2G3.1(b)(4)	+4 (portrayal of sadistic or masochistic conduct)

The parties have not reached an agreement as to the applicability of any role enhancement under <u>U.S.S.G. § 3B1</u>.1. The Defendant understands that the Government is free to seek such an enhancement.

The Government does not oppose a 2-level reduction in offense level pursuant to <u>U.S.S.G. § 3E1</u>.1(a) based upon the Defendant's acceptance of responsibility, provided that the Defendant continues to demonstrate compliance with the terms of § 3E1.1. The Defendant may be entitled to an additional one-level decrease pursuant to <u>U.S.S.G.</u> § 3E1.1(b) in recognition of the Defendant's timely notification of his intention to plead guilty.

The Government reserves its right to answer any questions posed by the sentencing judge and the United States Probation Office and to provide any information relevant to sentencing and the administration of justice.

8. Obligations of the Government: The Government will not further prosecute the Defendant for conduct prior to the date of this Plea Agreement that was part of the same course of criminal conduct described in the Information and that was known by the Government at the time of the execution of this Plea Agreement. This agreement does not bind any other local, state, or federal prosecutions.

- 9. Waiver of Appeal: In exchange for the concessions made by the Government in this Plea Agreement, the Defendant waives the right to appeal the conviction and sentence imposed, except if the sentence imposed exceeds the statutory maximum. The Defendant also waives the right to attack his conviction or sentence collaterally, such as by way of a motion brought under 28 U.S.C. § 2255 and 18 U.S.C. § 3582(c)(1)(B) or (c)(2). However, this waiver shall not be construed to bar a claim by the Defendant of ineffective assistance of counsel or prosecutorial misconduct.
- 10. <u>Freedom of Information Act</u>: The Defendant waives all rights under the Freedom of Information Act relating to his investigation and prosecution and agrees not to file any request for documents. The Defendant also waives all rights he may have under the Privacy Act of 1974, which prohibits the disclosure of records contained in a system of records without his written request or consent.
- 11. <u>Acceptance of Plea Agreement:</u> The Defendant understands that the Court is not bound by the sentencing recommendations or stipulations of the parties and that it is within the sole discretion of the Court to impose the sentence in this case.
- 12. Violation of Plea Agreement: The Defendant agrees to abide by the terms of this agreement, including all of the conditions listed in U.S.S.G. § 3E1.1. The Defendant understands that in the event he violates this agreement, the Government will be relieved of all of its obligations under this agreement and may institute any charges or sentencing recommendations that would otherwise be prohibited by this agreement, and the Defendant will not be relieved of any of his obligations under the Plea Agreement. Further, the Defendant understands and agrees that if he violates this agreement or it is voided for any reason, the Defendant waives all defenses based upon the statute of limitations and the Speedy Trial Act as to any charges that are part of the same course of criminal conduct described in the Information. And the Defendant understands that if the Defendant violates this agreement, the Defendant waives protection afforded by Rule 11(f) of the Federal Rules of Criminal Procedure, Rule 410 of the Federal Rules of Evidence, and § 1B1.8(a) of the United States Sentencing Guidelines. Any statements made by the Defendant in the course of plea discussions, in any proceeding pursuant to Fed. R. Crim. P. Rule 11, and to law enforcement authorities will be admissible against the Defendant without limitation in any civil or criminal proceeding.
- 13. <u>Defendant's Acknowledgment</u>: The Defendant acknowledges that he has read and understands this Plea Agreement; that he accepts this Plea Agreement knowingly and voluntarily and not as a result of any force, threats, or promises, other than the promises in this Plea Agreement; that he has conferred with his attorney regarding this Plea Agreement and the facts and circumstances of his case, including the applicable law and potential defenses, and that he is fully satisfied with the representation, advice, and other assistance of his attorney in this case.
- 14. <u>Entire Agreement:</u> This is the complete agreement, along with any attachment(s), between the parties. It supersedes all other promises, representations, understandings, and agreements between the parties.

KENNETH L. PARKER UNITED STATES ATTORNEY

TODD KIM

ASSISTANT ATTORNEY GENERAL Environment and Natural Resources Division U.S. Department of Justice

s/Adam C. Cullman

ADAM C. CULLMAN (KY #93912)

Special Assistant United States Attorney & Sr. Trial Attorney, Environmental Crimes Section Environment and Natural Resources Division 221 E. 4th St. Ste. 400 Cincinnati, OH 45202 adam.cullman@usdoj.gov

s/Mark Romley

MARK ROMLEY (CA #240655)

Trial Attorney
Environmental Crimes Section
Environment and Natural Resources Division
999 18th St., Suite 370
South Terrace
Denver, CO 80202
mark.romley@usdoj.gov

NICOLE PAKIZ (0096242)

Assistant United States Attorney 303 Marconi Boulevard, Suite 200

Columbus, OH 43215 Phone: 614-469-5715 nicole.pakiz@usdoj.gov

I have read this agreement and carefully reviewed every part of it with my attorney. I understand it, I voluntarily agree to it, and I do not wish to change any part of it. I am completely satisfied with the representation of my attorney.

4-5-24

Date

RONALD P. BEDRA

Defendant

I am Ronald P. Bedra's attorney. I have carefully reviewed every part of this agreement with the Defendant. He advises me that he understands and accepts its terms. To my knowledge, his decision to enter into this agreement is an informed and voluntary one.

Dote

STEVEN S. NOLDER

Attorney for RONALD P. BEDRA

## ATTACHMENT A: STATEMENT OF FACTS

The United States and Defendant Ronald P. Bedra stipulate and agree that if this case proceeded to trial, the United States would prove the facts set forth below beyond a reasonable doubt. They further stipulate and agree that these are not all of the facts that the United States would prove if this case had proceeded to trial.

At all times relevant to the charges in the Information:

- 1. Defendant RONALD P. BEDRA resided at 11 Orchard Glen Dr., Etna, Ohio.
- Beginning no later than June 2021, Ronald P. Bedra was the administrator for an online message board known as "Million Tears" dedicated to the creation, distribution, and discussion of videos depicting monkeys being tortured.
- It was implicitly understood by defendant and other members of Million Tears that they
  were expected to share monkey torture videos with the group after purchasing them and
  that other members would do likewise.
- 4. On or about August 25, 2021, BEDRA used the United States Postal Service to mail a USB drive from the Southern District of Ohio to co-conspirator 1 (CC1) in Wisconsin. The USB drive contained 64 videos depicting monkey torture, including the following five obscene videos:
  - a. Finger Lickin' Good.mp4 This video file is approximately 6 minutes and 43 seconds in length. The video depicts a monkey that has been tied to a tree by its arms and legs. The monkey is positioned in a manner so that its arms and legs are spread apart exposing its face, torso, and genitals. An unknown person strikes the monkey's face, torso, and genitals with a stick. At another point in the video, the monkey's fingers are cut off and placed in the monkey's mouth.

- b. Monkey Forest Adventure Prince Albert.mp4<sup>1</sup> This video is approximately 5 minutes and 40 seconds in length. The video depicts a monkey tied to a tree by its arms and legs in a manner that exposes its head, torso and genitals. An unknown person pushes straight pins through the monkey's ears, brow, nose, and penis. The person forcibly and repeatedly uses a straight pin to poke the monkey in the torso and genitals. At one point, the camera focuses on the monkey's genitals while they are being struck by the person's hand.
- c. <u>Icy Dunk by the balls.mp4</u> This video file is approximately 2 minutes and 50 seconds in length. The video depicts a monkey with its arms tied behind its back being dunked into a container of ice water by an unknown person. At one point, a looped piece of string is placed around the monkey's testicles and tightened. The monkey is then suspended upside-down by the string around its testicles and dunked into the container of ice water.
- d. Outdoor beat & poke toe peel begins.mp4 This video file is approximately 5 minutes and 13 seconds in length. The video initially depicts an unknown person striking a monkey with a branch while the monkey attempts to flee. The monkey is restrained by a person holding a chain attached to a collar around the monkey's neck. The person then pokes the monkey with a large straight pin. The monkey cries out while it is poked in the head and face. Later in the video, the monkey is positioned on its back and the person uses a branch to strike the monkey's testicles and penis.
- e. Monkey piñata.mp4 This video file is approximately 2 minutes and 15 seconds in length. The video depicts a monkey with its hands tied behind its back and feet tied together being suspended upside-down by a string that has been tied around its testicles. The monkey is lowered to the ground and an unknown person strikes the monkey multiple times with a stick. The person pulls on the string tied around the monkey's testicles while the camera is focused on the monkey's genitals.
- 5. The USB drive included 59 additional videos depicting monkey torture and abuse. These included depictions of a monkey having its toe cut off; a monkey having its arm cut off; a monkey's tail being set on fire; monkeys being punched, kicked, slapped, or beaten with

<sup>&</sup>lt;sup>1</sup> A "prince albert" is a slang term for a piercing of the male genitals. https://en.wikipedia.org/wiki/Prince Albert (genital piercing)

- sticks, or other objects; and monkeys with ropes tied around their necks or arms being repeatedly thrown into or dunked in bodies of water.
- 6. On or about October 9, 2021, in a chat group on a phone-based messaging program that included BEDRA, CC1, and others, co-conspirator 3 (CC3), a Million Tears member, wrote that the group "had some approval of the idea of taking a screwdriver... getting it white hot... and then shoving it up a monk[eys]'s asshole and holding the monk[ey] by the screwdriver's handle while it goes nutso."
- 7. In response, BEDRA stated that the most he could "kick in is \$20."
- 8. On or about October 16, 2021, BEDRA and co-conspirator 2 (CC2) discussed which videographer CC2 would ask to make the screwdriver video. CC2 indicated one videographer was "ready to work" and that his prices included the following: "\$20 for screwdriver in butt" "\$20 to smash hands" and "\$20 to throw against wall 3 times." BEDRA responded, "Superheated screwdriver, right? I'm in."
- 9. On or about October 16, 2021, BEDRA helped CC2 refine the request that CC2 would send to the videographer so that the video would meet the conspirators' expectations. This included BEDRA requesting that CC2 "Add the word 'deep'" when making the request. BEDRA continued, "Burning hot screwdriver deep into asshole. Spin monkey on it," and "Thanks a ton for arranging this. You're a badass."
- 10. On or about October 16, 2021, CC2 instructed BEDRA to send money to co-conspirator 4 (CC4) using a third-party payment program. CC4 and CC2 had agreed that CC4 would transfer money to the videographer as payment for creation of the "screwdriver video." BEDRA sent the money from the Southern District of Ohio.

- 11. On or about October 16, 2021, CC4 sent \$40 to a videographer in Indonesia, whose identity is known to the Government, using a third-party payment program.
- 12. On or about October 16, 2021, CC2 sent instructions to the Indonesian videographer asking him to create a video in which the videographer inserted a heated screwdriver into the anus of a monkey.
- 13. On or about October 17, 2021, the videographer created a video in which he heated a screwdriver and touched it to a monkey's anus. The videographer then sent this video from Indonesia to CC2 in the United States using a phone-based messaging program.
- 14. On or about October 17 2021, CC2 distributed this animal crush video to BEDRA using a phone-based messaging program. CC2 complained to BEDRA that the video was "so lame," to which BEDRA responded, "Live and learn."
- 15. On or about October 18, 2021, BEDRA distributed this animal crush video to a chat group named "The Last of the Last Stands." This group included BEDRA, CC1, CC3, CC4, and co-conspirator 5 (CC5).
- 16. On or about February 16, 2022, CC2 expressed an intent to try again to have "a hot screwdriver up the ass video" created. BEDRA responded, "YES PLEASE" and "Get screwdriver RED HOT. Put it up ass. Hold screwdriver still and spin monkey on it."
  BEDRA then sent CC2 a stock image of a red-hot piece of metal as an example of how he wanted the screwdriver to look before it was inserted in the monkey's anus.
- 17. On or about February 16, 2022, CC2 messaged the videographer and asked for him to create a new video in which a screwdriver was heated and inserted into a monkey's anus.

- 18. On or about March 11, 2022, in response to this request, the videographer created a video of a heated screwdriver being inserted into a monkey's anus and sent that video from Indonesia to CC2 in the United States using a phone-based messaging program.
- 19. On or about March 11, 2022, CC2 received the video of a heated screwdriver being inserted into a monkey's anus and distributed it to BEDRA in the Southern District of Ohio.
- 20. On or about March 11, 2022, BEDRA sent the following messages to CC2, "BURNING HOT SCREWDRIVER SUPERGLUED INTO A BUTTHOLE," "Ooh," and "About to drive to work...will watch when I get there! Big download."
- 21. Thereafter, on or about March 19, 2022, CC2 distributed the obscene video of a screwdriver being inserted into the anus of a monkey to the remaining co-conspirators through a group known as "Slicey's Tail" using a phone-based messaging program.

I have read the Statement of Facts	and have carefully reviewed it with my attorney.
I acknowledge that it is true and correct.	
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Date 7- 24

RONALD P. BEDRA

Defendant

I am Ronald P. Bedra's attorney. I have carefully reviewed the Statement of Facts with him.

7-5-24 Date

STEVEN S. NOLDER
Attorney for RONALD P. BEDRA

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