

FILED

NOV 12 2025

Clerk, U.S. District Court
Texas Eastern

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

WILLIAM CALEB ELLIOTT

§
§
§
§
§

No. 4:25CR

Judge

226

Alm / BD

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 18 U.S.C. §§ 2251(a) and (e)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; that such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce Victim 1, a minor known to the Grand Jury, to engage in sexually

explicit conduct for the purpose of producing a visual depiction of such conduct, using the internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) and (e).

Count Two

Violation: 18 U.S.C. §§ 2251(a) and (e)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; that such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce Victim 2, a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using the internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) and (e).

Count Three

Violation: 18 U.S.C. §§ 2251(a) and (e)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; that such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce Victim 3, a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using the internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) and (e).

Count Four

Violation: 18 U.S.C. §§ 2251(a) and (e)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; that such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce Victim 4, a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using the internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) and (e).

Count Five

Violation: 18 U.S.C. §§ 2251(a) and (e)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the

purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; that such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce Victim 5, a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using the internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) and (e).

Count Six

Violation: 18 U.S.C. §§ 2251(a) and (e)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; that such visual depiction was produced

using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce Victim 6, a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using the internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) and (e).

Count Seven

Violation: 18 U.S.C. §§ 2251(a) and (e)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce; that such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of

interstate and foreign commerce and in and affecting interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce Victim 7, a minor known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using the internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) and (e).

Count Eight

Violation: 18 U.S.C. §§ 2251(a) & (e)
(Sexual Exploitation of Children a/k/a
Production of Child Pornography;
Attempt)

Between on or about April 8, 2025, and on or about October 2, 2025, in the Eastern District of Texas, and elsewhere, **William Caleb Elliott**, defendant, did employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct, and did attempt to employ, use, persuade, induce, entice, and coerce any minor to engage in sexually explicit conduct, for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; that such visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and that such visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting

interstate and foreign commerce. Specifically, the defendant, **William Caleb Elliott**, did employ, use, persuade, induce, entice, and coerce a minor known to the Grand Jury, and did attempt to employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using the Internet and digital devices he owned and possessed.

In violation of 18 U.S.C. §§ 2251(a) & (e)

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Upon conviction of the offense(s) alleged in this Indictment, the defendant, **William Caleb Elliott**, shall forfeit to the United States his interest in the following property, including, but not limited to:

1. Apple iPhone 17, black, IMEI 350319290192780, IMEI(2): 350319290117423, Serial No. KMVQD3Y2VN

This property is forfeitable pursuant to 18 U.S.C. § 2253(a) based upon the property being:

1. any visual depiction described in section . . . 2252 of this chapter, 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 this chapter;
2. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; or
3. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

By virtue of the commission of the offense alleged in this Indictment, any and all interest the defendant has in this property is vested in and forfeited to the United States pursuant to 18 U.S.C. §§ 2253(a)(1) and (a)(3).

A TRUE BILL

SD.
GRAND JURY FOREPERSON

JAY COMBS
ACTING UNITED STATES ATTORNEY

Calli Bailey
CALLI BAILEY
Assistant United States Attorney

Date: 11/12/2025

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SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
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NOTICE OF PENALTY

Counts One through Eight

Violation: 18 U.S.C. §§ 2251(a) and (e)

Penalty: Imprisonment for not less than 15 years and not more than 30 years; if the defendant has a prior conviction under this chapter, section 1591, chapter 71, chapter 109A, chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or sex trafficking of children, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography or sex trafficking of children, such person shall be imprisoned for not less than 25 years and not more than 50 years; if the defendant has two or more convictions under this chapter, section 1591, chapter 71, chapter 109A, chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to the sexual exploitation of children, such person shall be imprisoned for not less than 35 years and not more than life; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

Special Assessment: \$ 100.00

JVTA Assessment: \$ 5,000.00

AVAA Assessment: \$ 50,000.00