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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

VICTIM

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

CR-25-0190-TUC-AMM (BGM)
**SUPERSEDING
INDICTMENT**

Violations:

18 U.S.C. § 2252A(g)
(Child Exploitation Enterprise)
Count 1

18 U.S.C. §§ 2339A and 956(a)
(Conspiracy to Provide Material Support to
Terrorists)
Count 2

18 U.S.C. §§ 956(a)(1) and 956(a)(2)
(Conspiracy to Kill, Kidnap, or Maim
Persons in a Foreign Country)
Count 3

18 U.S.C. § 1958(a)
(Use of Interstate Commerce Facilities in the
Commission of Murder-for-Hire)
Count 4

18 U.S.C. §§ 2251(a) and (e)
(Production of Child Pornography)
Counts 5 – 9

vs.

Baron Cain Martin,
aka "Convict,"
aka "Connor,"
aka "Cain,"
aka "chickwit,"
aka "convict764#0,"

aka "cultsec,"

18 U.S.C. §§ 2252 (a)(2) and (b)(1)
(Distribution of Child Pornography)
Counts 10 – 20

aka "cvltsec,"

aka "ecstasy,"

18 U.S.C. § 2422(b)
(Coercion and Enticement of a Minor)
Count 21

aka "govmails#0,"

aka "internetclique,"

aka "internetcvlt,"

18 U.S.C. § 2422(b)
(Attempted Coercion and Enticement of a
Minor)
Counts 22 – 23

aka "nikkkaokjsksni27,"

aka "oguser_#0,"

aka "screwthefbi,"

18 U.S.C. §§ 2261A(2) and 2261B
(Cyberstalking of a Child)
Count 24

aka "tourist,"

Defendant.

18 U.S.C. §§ 2261A(2), 2261B, and
2261(b)(2)
(Cyberstalking of a Child Resulting in
Permanent Disfigurement or Life-
Threatening Injury)
Count 25

18 U.S.C. §§ 2261A(2) and 2261(b)(5)
(Cyberstalking)
Count 26

18 U.S.C. §§ 48(a)(1) and (c), and § 2
(Animal Crushing)
Count 27

18 U.S.C. §§ 48(a)(3) and (c)
(Distribution of Animal Crush Videos)
Count 28

18 U.S.C. §§ 1349 and 1343
(Conspiracy to Commit Wire Fraud)
Count 29

18 U.S.C. § 2253
(Criminal Forfeiture)

THE GRAND JURY CHARGES:

COUNT 1

(Child Exploitation Enterprise, 18 U.S.C. § 2252A(g))

The Child Exploitation Enterprise

1. At various times relevant to this Superseding Indictment, the defendant BARON CAIN MARTIN, also known as (“aka”) “Convict,” aka “Connor,” aka “Cain,” aka “chickwit,” aka “convict764#0,” aka “cultsec,” aka “cvltsec,” aka “ecstasy,” aka “govmails#0,” aka “internetclique,” aka “internetcvlt,” aka “nikkkaokjsksni27,” aka “oguser_#0,” aka “screwthefbi,” aka “tourist,” (“defendant” or “MARTIN”), and others known and unknown to the grand jury, in the District of Arizona and elsewhere, were members and associates of an internet-based group known as 764 and related groups (“764,” “764 Exploitation Enterprise,” the “Enterprise,” or “CVLT and 764”), the purpose of which was, among other things, the production of, enticement and coercion to produce, advertisement of, receipt of, distribution of, possession of, and access with intent to view child pornography, as defined in 18 U.S.C. § 2256(8)(a), and distribution of child sexual abuse material (“CSAM”).

2. Nihilistic Violent Extremists (“NVEs”) are individuals who engage in criminal conduct within the United States and abroad, in furtherance of political, social, or religious goals that derive primarily from a hatred of society at large and a desire to bring about its collapse by sowing indiscriminate chaos, destruction, and social instability. NVEs work individually or as part of a network with these goals of destroying civilized society through the corruption and exploitation of vulnerable populations, which often include minors. CVLT and 764 are NVEs who engage in criminal conduct within the United States and engage with other extremists abroad. 764 engaged in, among other conduct, online child sexual exploitation. 764 members worked collectively to entice, induce, and coerce children to self-produce child pornography on internet servers associated with and run by 764 on various social media platforms.

3. The CVLT and 764 networks’ accelerationist goals include social unrest and the downfall of the current world order, including the United States Government. Members of

1 CVLT and 764 work in concert with one another towards a common purpose of destroying
2 civilized society through the corruption and exploitation of vulnerable populations,
3 including minors.

4 4. CVLT and 764 members, both individually and as a network, systematically and
5 methodically target vulnerable populations across the United States and the globe. CVLT
6 and 764 frequently use social media communication platforms to connect with individuals
7 and desensitize them to violence by, among other things, breaking down societal norms
8 regarding engaging in violence, normalizing the possession, production, and sharing of
9 child sexual abuse material (CSAM) and gore material, and otherwise corruption and
10 grooming those individuals towards committing future acts of violence.

11 5. MARTIN and other 764 members groomed children for production of child
12 pornography through various means of degradation, including coercing and compelling
13 children to engage in dehumanizing acts (e.g., cutting their own hair and calling themselves
14 “whore” or “slut”), self-harm (e.g., victims carving into their own bodies the names or
15 usernames of 764 members; carving into their own bodies symbols, such as swastikas or
16 satanic symbols; carving into their own bodies phrases or games; and inserting objects into
17 their genitals), and exposing children to extremist and violent content (e.g., displaying
18 videos of animal crushing, self-harm, murders and/or suicides). For children who resisted,
19 764 members threatened to murder the victim, or the victim’s family, as well as “swat,”
20 “dox,” and distribute the child victim’s pornography to the public.

21 6. CVLT and 764 targeted individuals online, often through synchronized group chats.
22 The members frequently conduct coordinated extortions of individuals by blackmailing
23 them to comply with the demands of the network. These demands vary and include, but
24 are not limited to, self-mutilation, online and in-person sexual acts, harm to animals, sexual
25 exploitation of siblings and others, acts of violence, threats of violence, suicide, and
26 murder.

27 7. MARTIN was a member of 764 and its precursor and offshoot groups, including
28 CVLT. MARTIN joined these groups as early as 2019 and continued to participate in the

1 groups' activities until approximately December 11, 2024. MARTIN's usernames on
2 various social media platforms included: "Convict," "Connor," "Cain," "chickwit,"
3 "convict764#0," "cultsec," "cvltsec," "ecstasy," "govmails#0," "internetclique,"
4 "internetcvlt," "nikkkaokjsksni27," "oguser_#0," "screwthefbi," and "tourist."

5 8. MARTIN acted as a leader and administrator of CVLT and 764 by hosting and
6 running the Enterprise group chats and directing others to do so, controlling membership
7 in these group chats, controlling access to and distribution of extortion video chats and
8 other materials, and directing, demanding, compelling, and instructing victims during the
9 creation of child pornography, extortion videos, and other conduct, including, but not
10 limited to, animal crushing.

11 9. In approximately August 2022, the Federal Bureau of Investigation identified a
12 guide that MARTIN helped to author and posted on an encrypted social media platform.
13 The guide was titled, "Grooming/Manipulation Egirls Guide," and it was used to teach
14 Enterprise members how to identify, groom, and extort juvenile victims. The guide
15 circulated among individuals associated with CVLT and 764 and was credited to "Convict"
16 - one of MARTIN's online usernames. In the guide, MARTIN advised readers to target
17 those struggling with mental health, specifically those with eating disorders, and those who
18 already commit self-harm, due to their inherent vulnerability to psychological
19 manipulation. MARTIN further provided instructions to Enterprise members for how to
20 groom a female depending on the victim's particular mental health problem. MARTIN's
21 guide stated the goal was for Enterprise members to build trust with the victims so the
22 Enterprise could obtain video and other content from the victim, including child
23 pornography, which the Enterprise then used to blackmail, dox, extort, and engage in
24 hands-on abuse of the victims.

25 10. At various times relevant to this Superseding Indictment, MARTIN was a resident
26 of Tennessee, Utah, and Arizona, and all victims resided outside Tennessee, Utah, Arizona,
27 and/or the United States.
28

11. From 2019 to on or about December 11, 2024, MARTIN violated Chapter 110 (except for sections 2257 and 2257A) as part of a series of felony violations constituting three or more separate incidents and involving more than one victim, and MARTIN committed those offenses in concert with three or more other persons known and unknown to the Grand Jury.

Means and Methods of the 764 Enterprise

12. Among the means and methods by which MARTIN and other CVLT and 764 members conducted and participated in the affairs of the 764 Child Exploitation Enterprise include, but are not limited to, the following:

- a. 764 members invited children to online group chats associated with and run by 764 on various social media platforms.
- b. In approximately September 2022, MARTIN was part of a group conversation on a social media platform formed for the purpose of extorting young victims. When referring to this “group chat” or “gc,” MARTIN admitted the group made their victims engage in live sexual acts, including by inserting objects into their genitals. MARTIN and at least three other conspirators compelled and coerced minors to cut themselves, engage in live sexual acts over video calls, and MARTIN and his coconspirators would add other coconspirators to their group chats for the purpose of victimizing minors and others online. Enterprise members would then threaten to dox the victims, or leak photos of the victims, if they did not comply with the Enterprise’s demands, including self-harm, harm to others, and sexual acts. Enterprise members would instruct the victims on what the group wanted the victims to do over the live chats.
- c. Once on the group chats, 764 members would groom the victim children to comply with the demands of the Enterprise, including by participating in the self-production of child pornography. The grooming includes, for example:
 - i. Exploiting existing vulnerabilities such as mental health challenges to break down children’s willpower and resistance.

- 1 ii. Degrading children by making them cut phrases into their body like “Convict
- 2 owns me,” “I’m a worthless slut,” calling children “whore,” “slut,” or
- 3 “bitch,” having children say they are a “worthless whore” about themselves
- 4 and forcing victims to cut off their hair on livestream (nearly always recorded
- 5 and retained by the Enterprise).
- 6 iii. Encouraging children to harm themselves and others to desensitize them to
- 7 extreme and violent acts, such as cutting themselves, overdosing, and –
- 8 eventually – escalating to killing themselves on livestream.
- 9 iv. Exposing children to violent and extremist content, such as animal torture
- 10 and animal crushing, sadistic and masochistic acts, and gore child
- 11 pornography.
- 12 v. Promoting extreme philosophies such as neo-Nazism, nihilism, anarchy,
- 13 pedophilia, rape, extortions, and lawlessness.
- 14 d. Once 764 members obtained the pornography and other content from child
- 15 victims, they would coerce the children to produce more child pornography,
- 16 threatening to release the existing child pornography to the child’s friends and
- 17 family, or the public, if the child did not produce more child pornography. Other
- 18 times, 764 members would reveal they knew the child’s identity and location
- 19 and would threaten to swat or dox the child or murder the child’s family.
- 20 e. For example: From approximately August 2022 to December 2022, Minor
- 21 Victim 1 (“MV1”) became MARTIN’s “main” victim for cutting. At the time,
- 22 MV1 was 13 years old and resided in a foreign country. MARTIN instructed
- 23 MV1 to cut over MV1’s old scars and cuts because he wanted his name “in every
- 24 possible place” on MV1’s body. MARTIN also directed MV1 to cut designs and
- 25 phrases into MV1’s body, including swastikas, satanic symbols, and the phrase
- 26 “FUCK 12” (which means “fuck the police”), resulting in permanent
- 27 disfigurement. MARTIN obtained MV1’s personal information, including
- 28 MV1’s phone number, phone type, and Internet Protocol (“IP”) address.

1 MARTIN also took a screenshot of MV1's live location via a social media
2 application and used the information to locate MV1's school. When MV1
3 refused to cut for him, MARTIN wrote down a list of schools closest to MV1
4 and threatened to call them. He also threatened to call MV1's mother and local
5 police department. MARTIN further threatened to contact MV1's parents if
6 MV1 did not cut for him, told MV1 he knew someone who lived in MV1's area,
7 and that he was going to send someone to MV1's house to rape and hurt MV1
8 and MV1's family. MARTIN's social media records show he searched the time
9 zone where MV1 lived in November 2022 and googled MV1's home address in
10 December 2022. MARTIN told MV1 to travel to America when MV1 turned 16
11 years old so that MARTIN could abuse, rape, and cut MV1. MARTIN also
12 compelled MV1 to overdose on pills in accordance with MARTIN's demands.
13 During this time, MARTIN told MV1 he was going to make MV1 commit self-
14 torture until MV1 died.

15 f. 764 members would discuss the child sexual exploitation, including by
16 encouraging other members to coerce children to engage in more extreme,
17 violent, and degrading behavior and required others associated with 764 to do
18 the same. Enterprise members also discussed the potential of being apprehended
19 and how to evade detection by law enforcement.

20 g. Having degraded and groomed the children, Enterprise members would then
21 knowingly employ, use, persuade, induce, entice, and coerce children to self-
22 produce child pornography and to self-harm. This child pornography sometimes
23 included the insertion of foreign objects like knives or whisks into their genitals.

24 h. For example:

25 i. On or about September 5, 2022, using a social media platform, MARTIN
26 sent to another 764 member a nude photograph of MV1 with the phrase
27 "Convict owns me" cut into MV1's groin area above MV1's genitals, in
28 violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

- 1 ii. On or about September 7, 2022, MARTIN sent a video of MV1 to another
2 conspirator over a social media platform. In the video, MV1 was fully nude
3 and kneeling in front of the camera in a praying pose while stating, “Convict
4 owns me. I’m his pathetic whore.” The video showed MV1 had cutting scars
5 and “CONVICT” written on MV1’s face with MV1’s lower lip bleeding and
6 blood dripped down MV1’s chest. The distribution of the video is a violation
7 of 18 U.S.C. §§ 2252(a)(2) and (b)(1).
- 8 iii. On or about September 9, 2022, while trying to groom another victim,
9 MARTIN sent a photograph of MV1 over a social media platform. MV1 was
10 kneeling and fully nude from the waist down with the phrase “I am a
11 worthless whore” cut into MV1’s stomach along with what appeared to be
12 satanic symbols. MARTIN sent the image with a message stating, “[MV1]’s
13 12.” The distribution of this child pornography is in violation of 18 U.S.C.
14 §§ 2252(a)(2) and (b)(1).
- 15 iv. On or about September 10, 2022, on a social medial platform, MARTIN
16 knowingly enticed Minor Victim 2 (“MV2”), then 15 years old, to scratch
17 MV2’s arms until MV2 drew blood and encouraged MV2 to pour alcohol
18 over MV2’s injuries for the purpose of producing a video of sadistic and
19 masochistic conduct and for the purpose of transmitting a live visual
20 depiction of such conduct in violation of 18 U.S.C. §§ 2251(a) and (e).
21 Thereafter, MARTIN sent to another Enterprise member videos of MV2’s
22 sexually explicit conduct.
- 23 v. On or about September 10, 2022, MARTIN was a participant in a direct
24 message group conversation where Minor Victim 8 (“MV8”) identified as
25 being 15 years old. In his messages with MV8, MARTIN encouraged MV8
26 to cut his name and to “try to go deeper than usual ... do a few swastikas
27 under it.” MARTIN then sent MV8 a photo of a sigil and told MV8 to cut
28 that telling MV8, “we’re gonna start covering your leg tonight ... start filling

1 up your leg with my name.” MARTIN conveyed to MV8 that he wanted “to
2 see [MV8’s] entire arm dripping in blood.” Approximately one minute later,
3 MARTIN sent a photo of MV8 to another Enterprise member, telling his
4 conspirator that he “got a new cutwhore.” MARTIN’s knowing enticement
5 of MV8 for the purpose of producing a video of sadistic and masochistic
6 conduct and for the purpose of transmitting a live visual depiction of such
7 conduct is in violation of 18 U.S.C. §§ 2251(a) and (e).

8 vi. On or about September 13, 2022, over a social media platform, MARTIN
9 distributed a video of MV1 depicting child pornography to another
10 Enterprise member, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

11 vii. On or about September 16, 2022, during a group chat with other Enterprise
12 members, MARTIN sent them a video of MV1 containing child
13 pornography. After sending the video to the group, MARTIN stated, “I could
14 flex so hard with cutsigns but thats so overused.” MARTIN’s distribution of
15 the video of MV1 is in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

16 viii. On or about September 18, 2022, during a chat with another conspirator,
17 MARTIN sent a series of photos and videos, including a video of MV1
18 containing child pornography, all in violation of 18 U.S.C. §§ 2252(a)(2) and
19 (b)(1).

20 ix. On or about September 18, 2022, Minor Victim 9 (“MV9”), then 14 years
21 old, was added to a live group chat with Enterprise members that included
22 MARTIN. MARTIN and the group persuaded MV9 to insert a whisk into
23 MV9’s genitals. A short while later, MARTIN added a new user to the chat
24 and told the user to join the call because someone was “fucking [themselves]
25 on a call. with a whisk.” In a separate server chat, MARTIN thereafter sent a
26 nude photo of MV9 from the waist down with cut marks on MV9’s thigh that
27 were bleeding with a whisk between the legs. After sending this photo,
28 another Enterprise member asked, “EW WHAT IS THAT,” to which

1 MARTIN replied, “a whisk!” MARTIN’s knowing enticement of MV9 for
2 the purpose of producing an image of sexually explicit conduct for the
3 purpose of transmitting a visual depiction is in violation of 18 U.S.C. §§
4 2251(a) and (e).

- 5 x. On or about September 18, 2022, in a separate chat on a social media
6 platform, MARTIN distributed to Minor Victim 4 (“MV4”), then 13 years
7 old, a photo of MV9 containing child pornography, as described above.
- 8 xi. On or about September 20, 2022, in response to a request from another
9 Enterprise member, MARTIN distributed two photos of MV1 containing
10 child pornography over a social medial platform, in violation of 18 U.S.C.
11 §§ 2252(a)(2) and (b)(1). When the Enterprise member asked MARTIN,
12 “how do you make them do it,” MARTIN replied, “simple manipulation.”
- 13 xii. On or about September 22, 2022, MARTIN sent a collage of photos and
14 videos to three separate Enterprise members using a social media platform.
15 The collage MARTIN distributed included a photograph of MV1 containing
16 child pornography, in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).
- 17 xiii. On or about September 26, 2022, during one of his online chats with MV1,
18 MARTIN told MV1 to insert the blade of a knife, with his name written on
19 it, into MV1’s genitals. The next day, MARTIN sent MV1 a three-second
20 video of a MV1 removing a knife from MV1’s genitals. The word “Convict”
21 was written on the blade of the knife. MV1 responded with, “STOP.
22 DLETW. EW. omg. omg. omg. stop.” MARTIN’s response to MV1 was,
23 “cope. gonna be there. forever.” MARTIN’s use of MV1 for the purpose of
24 producing a video of MV1 engaging in sexual conduct on a social media
25 platform and for the purpose of transmitting the live image is in violation of
26 18 U.S.C. §§ 2251(a) and (e).
- 27
28

- 1 xiv. On or about September 27, 2022, during a social media chat with another
2 user who accused MARTIN of being a poser, MARTIN sent a video of MV1
3 engaging in sexual conduct, in violation of 18 U.S.C. § 2252(a)(2).
- 4 xv. On or about September 29, 2022, during a conversation on a social media
5 platform with another Enterprise member that centered around MV4,
6 MARTIN sent a photograph of MV4 while MV4 appeared to be
7 masturbating. Upon receiving the photo, the other 764 member responded,
8 “cp on ur phone yh nice.” The distribution of this child pornography is in
9 violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).
- 10 xvi. In approximately September 2022, MARTIN messaged MV4 over a social
11 media platform making several references to him and MV4 engaging in
12 “esex” including comments that indicated MARTIN watched MV4 engage
13 in sexually explicit conduct on video calls and that MV4 sent him “nudes.”
14 Throughout chats with other Enterprise members, MARTIN made comments
15 that he was aware MV4 may only be 13 or 14 years old and that he could go
16 to jail for his actions. In one chat with another Enterprise member, MARTIN
17 admitted MV4 was “young ... nigga imma go 2 jail for sayin dis.”
18 MARTIN’s enticement of MV4 is in violation of 18 U.S.C. § 2422(b).
- 19 xvii. In approximately September 2022, during a social media chat, MARTIN
20 attempted to have Minor Victim 5 (“MV5”), then 11 years old, insert a knife
21 into MV5’s genitals. MV5 was hesitant but MARTIN replied, “just do it. im
22 not bothering to ask again. and im tired of cutsigns too.” From their
23 messages, it appears MV5 sent cut-signs and fan-signs to MARTIN.
24 MARTIN also instructed MV5 to do a “praying pose.” In April 2024,
25 MARTIN sent a photo to other Enterprise members of MV5 wearing
26 underwear on a bed, in a praying pose, with “CONVICT” written across
27 MV5’s stomach. When MARTIN shared the photograph, he stated MV5 was
28

1 12 years old. MARTIN's attempted enticement and coercion of MV5 is in
2 violation of 18 U.S.C. § 2422(b).

3 xviii. In approximately September 2022, during a social media chat, Minor Victim
4 6 ("MV6") told MARTIN MV6 was 15 years old. MARTIN attempted to
5 groom MV6 into cutting for him. MV6 initially agreed to cut for MARTIN
6 and when MV6 asked what MARTIN wanted MV6 to do, MARTIN
7 responded, "probably lots of little cuts in shallow areas ... ribs, collarbone,
8 wrist, inner thighs ... the point is all at once will make you have a bit of blood
9 loss. not enough to kill you but will you out of consciousness ... it gets much
10 worse from here." When MARTIN told MV6 to carve names on MV6's
11 body, MV6 rejected the idea and made a comment about MV6's "precious
12 blood," to which MARTIN replied, "its mine now." When MV6 told
13 MARTIN that MV6 was uncomfortable doing what he asked and had
14 changed MV6's mind, MARTIN replied, "you told me you wanted to learn
15 how to not care ... and nothing will change if you continue being a pussy
16 about it." When MV6 still refused to cut for MARTIN, he called MV6 a
17 "fucking pathetic whore," and their conversation ended shortly thereafter.
18 MARTIN's attempted enticement of MV6 is in violation of 18 U.S.C. §
19 2422(b),

20 All in violation of 18 U.S.C. § 2252A(g).

21 COUNT 2

22 (Conspiracy to Provide Material Support to Terrorists, 18 U.S.C. §§ 2339A and
23 956(a)(1))

24 13. The factual allegations contained in Paragraphs 1 through 12 of the Superseding
25 Indictment are re-alleged and fully incorporated by reference herein.

26 14. In approximately August 2022, in Tucson, within the District of Arizona and
27 elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka
28 "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy,"

1 aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka
2 "oguser_#0," aka "screwthefbi," aka "tourist," did knowingly conspire and agree with
3 others, known and unknown, to provide material support and resources to wit: himself as
4 personnel, services, and expert advice or assistance, knowing and intending that the
5 material support and resources were to be used in preparation for, and in carrying out a
6 violation of, 18 U.S.C. § 956(a), Conspiracy to Kill, Kidnap, Maim or Injure Persons in a
7 Foreign Country, to wit: conspiring with one or more persons, located inside and outside
8 of the United States, to commit at any place outside the United States, an act that would
9 constitute the offense of murder, kidnapping, and maiming if committed in the special
10 maritime and territorial jurisdiction of the United States.

11 15. In furtherance of this conspiracy, and to effect the objectives thereof, MARTIN and
12 others, known and unknown, committed and caused to be committed, among others, the
13 following:

- 14 a. In approximately August 2022, the Federal Bureau of Investigation identified a
15 guide that MARTIN helped to author and posted on an encrypted social media
16 platform. The guide was titled, "Grooming/Manipulation Egirls Guide," and it
17 was used to teach 764 members how to identify, groom, and extort juvenile
18 victims. The guide circulated among individuals associated with CVLT and 764
19 and was credited to "Convict" - one of MARTIN's online usernames. In the
20 guide, MARTIN advised readers to target those struggling with mental health,
21 specifically those with eating disorders, and those who already commit self-
22 harm, due to their inherent vulnerability to psychological manipulation.
23 MARTIN further provided instructions to Enterprise members for how to groom
24 a female depending on the victim's particular mental health problem.
25 MARTIN's guide stated the goal was for 764 members to build trust with the
26 victims so the network could obtain video and other content from the victim,
27 including child pornography, which 764 then used to blackmail, dox, extort, and
28 engage in hands-on abuse of the victims.

- All in violation of 18 U.S.C. §§ 2339A and 956(a).

(Conspiracy to Kill, Kidnap, or Maim Persons in a Foreign Country,

18 U.S.C. §§ 956(a)(1) and (a)(2))

16. The factual allegations contained in Paragraphs 1 through 15 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

17. In approximately September 2022, in Tucson, within the District of Arizona and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," willfully and intentionally agreed with one or more other persons to kill, kidnap, and maim another person at a place outside the United States, to wit: V7, an act that would constitute the offense of murder, kidnapping, or maiming if committed in the special maritime and territorial jurisdiction of the United States.

All in violation of 18 U.S.C. §§ 956(a)(1) and 956(a)(2).

COUNT 4

(Use of Interstate Commerce Facilities in the Commission of Murder-for-Hire, 18 U.S.C. § 1958(a))

18. The factual allegations contained in Paragraphs 1 through 15 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

19. From on or about September 16, 2022 to on or about October 11, 2022, in Tucson, within the District of Arizona and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," with the intent that a murder be committed in violation of the laws of any State or the United States, as consideration for the receipt of and as consideration for a promise or agreement to pay anything of pecuniary value, to wit: using the mail or any facility of interstate and foreign commerce to offer and pay \$3000.00 to another individual in exchange for the other individual killing and kidnapping Minor Victim 3 ("MV3") and MV3's relative, in violation of 18 U.S.C. § 1958(a).

20. In furtherance thereof, in September 2022:

- a. On a social media platform, MARTIN solicited others to kill MV3 and MV3's relative for \$3,000 U.S. dollars.
- b. MARTIN posted on a social media platform, "[MV3's boyfriend] literally just called a hit on [MV3] by posting that dox. im hitting up someone to kill [MV3's relative]. lmao."
- c. In furtherance of the conspiracy, MARTIN asked his accomplice, "know anyone in [MV3's state]. thats willing to do kidnappings or shootings ... I need someone to tobbz a grandma."¹
- d. Over social media messages, MARTIN agreed to pay the \$3,000.00 dollar fee for the murder.
- e. In social media messages, MARTIN admitted to other 764 members that he paid \$3,000 dollars for MV3's relative to be murdered rather than kidnapped because it was "easier."
- f. Thereafter, over a social media platform, MARTIN shared the address of MV3's relative with his accomplice to effectuate the murder.

All in violation of 18 U.S.C. § 1958(a).

COUNT 5

(Production of Child Pornography, 18 U.S.C. §§ 2251(a) and (e))

21. The factual allegations contained in Paragraphs 1 through 15 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

22. On or about September 26, 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," knowingly employed, used, persuaded,

¹ Tobbz is a German national who livestreamed himself attacking an 82-year-old woman in March 2022 and two weeks later livestreamed his fatal stabbing of a 74-year-old woman.

1 induced, enticed, and coerced a minor child, to wit: MV1, who had not yet attained the age
2 of 18, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), for the
3 purpose of producing a visual depiction of such conduct and for the purpose of transmitting
4 a live visual depiction of such conduct, which visual depiction was produced using
5 materials that had been mailed, shipped, and transported in interstate and foreign commerce
6 by any means, and was actually transported in interstate and foreign commerce, that is by
7 computer, and which visual depictions include, but are not limited to:

8 1020399525388619806_1024401057767510096_1024401057159327764_cm-
9 chat-media-video-1ebba7c75-2408-5a50-81f6-0680e13795d5676900.mov.

10 All in violation of 18 U.S.C. §§ 2251(a) and (e).

11 COUNT 6

12 (Production of Child Pornography, 18 U.S.C. §§ 2251(a) and (e))

13 23. The factual allegations contained in Paragraphs 1 through 12 of the Superseding
14 Indictment are re-alleged and fully incorporated by reference herein.

15 24. On or about September 10, 2022, in Tucson, within the District of Arizona, and
16 elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka
17 "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy,"
18 aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka
19 "oguser_#0," aka "screwthefbi," aka "tourist," knowingly employed, used, persuaded,
20 induced, enticed, and coerced a minor child, to wit: MV2, who had not yet attained the age
21 of 18, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), for the
22 purpose of producing a visual depiction of such conduct and for the purpose of transmitting
23 a live visual depiction of such conduct, which visual depiction was produced using
24 materials that had been mailed, shipped, and transported in interstate and foreign commerce
25 by any means, and was actually transported in interstate and foreign commerce, that is by
26 computer, and which visual depictions include, but are not limited to:

27 1018277660176175165_1018281812428071054_1018281810288988291_RPR
28 play_Final1662847444.mov;

1 1018277660176175165_1018281812428071054_1018281811064918147_RPR
2 play_Final1662847444.mov; and

3 1018277660176175165_1018281812428071054_1018281812130283630_RPR
4 play_Final1662847444.mov.

5 All in violation of 18 U.S.C. §§ 2251(a) and (e).

6 COUNT 7

7 (Production of Child Pornography, 18 U.S.C. §§ 2251(a) and (e))

8 25. The factual allegations contained in Paragraphs 1 through 12 of the Superseding
9 Indictment are re-alleged and fully incorporated by reference herein.

10 26. On or about September 10, 2022, in Tucson, within the District of Arizona, and
11 elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka
12 "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy,"
13 aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka
14 "oguser_#0," aka "screwthefbi," aka "tourist," knowingly employed, used, persuaded,
15 induced, enticed, and coerced a minor child, to wit: MV8, who had not yet attained the age
16 of 18, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), for the
17 purpose of producing a visual depiction of such conduct and for the purpose of transmitting
18 a live visual depiction of such conduct, which visual depiction was produced using
19 materials that had been mailed, shipped, and transported in interstate and foreign commerce
20 by any means, and was actually transported in interstate and foreign commerce, that is by
21 computer, and which visual depictions include, but are not limited to:

22 1016976276436820089_1018006699275194378_1018006698952241152_IMG_2
23 492.jpg.

24 All in violation of 18 U.S.C. §§ 2251(a) and (e).

25 COUNT 8

26 (Production of Child Pornography, 18 U.S.C. §§ 2251(a) and (e))

27 27. The factual allegations contained in Paragraphs 1 through 12 of the Superseding
28 Indictment are re-alleged and fully incorporated by reference herein.

28. On or about September 18, 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," knowingly employed, used, persuaded, induced, enticed, and coerced a minor child, to wit: MV9, who had not yet attained the age of 18, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, and was actually transported in interstate and foreign commerce, that is by computer, and which visual depictions include, but are not limited to:

1020373314574766120_1021138679625945228_1021138679122645105_IMG_1

915.png; and

1020373771086991373_1021148831884247090_1021148831431274677_IMG_1

915.png.

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

COUNT 9

(Production of Child Pornography, 18 U.S.C. §§ 2251(a) and (e))

29. The factual allegations contained in Paragraphs 1 through 12 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

30. In approximately September 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," knowingly employed, used, persuaded, induced, enticed, and coerced a minor child, to wit: MV4, who had not yet attained the age of 18, to engage in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), for the

purpose of producing and transmitting a live visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, and was actually transported in interstate and foreign commerce, that is by computer, and which visual depictions include, but are not limited to:

1023335528894038157_1024835978357121064_1024835978151591946_166440
5158926.jpg.

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

COUNT 10

(Distribution of Child Pornography, 18 U.S.C. §§ 2252 (a)(2) and (b)(1))

31. The factual allegations contained in Paragraphs 1 through 12 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

32. On or about September 5, 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," using any means or facility of interstate or foreign commerce, did knowingly distribute, child pornography, that is, visual depictions, the production of which involved the use of MV1, who had not yet attained the age of 18, engaging in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2), and which depicted such conduct, which had been shipped and transported in interstate or foreign commerce by means of computer, or otherwise, including, but not limited to, a file entitled:

1016151433705435136_1016151989467500637_1016151988670562334_IMG_1224.jpg.

All in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT 11

(Distribution of Child Pornography, 18 U.S.C. §§ 2252 (a)(2) and (b)(1))

33. The factual allegations contained in Paragraphs 1 through 12 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

34. On or about September 7, 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," using any means or facility of interstate or foreign commerce, did knowingly distribute, child pornography, that is, visual depictions, the production of which involved the use of MV1, who had not yet attained the age of 18, engaging in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), and which depicted such conduct, which had been shipped and transported in interstate or foreign commerce by means of computer, or otherwise, including, but not limited to, a file entitled:

1017180441909940314_1017182037997781092_1017182036097777884_-
7794779854966962436.mov.

All in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT 12

(Distribution of Child Pornography, 18 U.S.C. §§ 2252 (a)(2) and (b)(1))

35. The factual allegations contained in Paragraphs 1 through 12 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

36. On or about September 9, 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," using any means or facility of interstate or foreign commerce, did knowingly distribute, child pornography, that is, visual depictions, the production of which involved the use of MV1, who had not yet attained the age of 18, engaging in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), and which

1 depicted such conduct, which had been shipped and transported in interstate or foreign
2 commerce by means of computer, or otherwise, including, but not limited to, a file entitled:

3 1017897748579762196_1017903217310433361_1017903216895217704_IMG_
4 3495.png.

5 All in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

6 COUNT 13

7 (Distribution of Child Pornography, 18 U.S.C. §§ 2252 (a)(2) and (b)(1))

8 37. The factual allegations contained in Paragraphs 1 through 12 of the Superseding
9 Indictment are re-alleged and fully incorporated by reference herein.

10 38. On or about September 13, 2022, in Tucson, within the District of Arizona, and
11 elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka
12 "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy,"
13 aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka
14 "oguser_#0," aka "screwthefbi," aka "tourist," using any means or facility of interstate or
15 foreign commerce, did knowingly distribute, child pornography, that is, visual depictions,
16 the production of which involved the use of MV1, who had not yet attained the age of 18,
17 engaging in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), and which
18 depicted such conduct, which had been shipped and transported in interstate or foreign
19 commerce by means of computer, or otherwise, including, but not limited to, a file entitled:

20 1019126268920340581_1019126561305268274_1019126561007484988_IMG_
21 1141.mov;

22 1019083950729211966_1019116773175459861_1019116772974149673_IMG_
23 1568.png; and

24 1019083950729211966_1019141034443296859_1019141033843507231_IMG_
25 1568.png.

26 All in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

27 COUNT 14

28 (Distribution of Child Pornography, 18 U.S.C. §§ 2252 (a)(2) and (b)(1))

39. The factual allegations contained in Paragraphs 1 through 12 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

40. On or about September 16, 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," using any means or facility of interstate or foreign commerce, did knowingly distribute, child pornography, that is, visual depictions, the production of which involved the use of MV1, who had not yet attained the age of 18, engaging in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), and which depicted such conduct, which had been shipped and transported in interstate or foreign commerce by means of computer, or otherwise, including, but not limited to, a file entitled:

1020398732426096831_1020401942331142204_1020401941936865311_-
2485672833554988934.mp4.

All in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT 15

(Distribution of Child Pornography, 18 U.S.C. §§ 2252 (a)(2) and (b)(1))

41. The factual allegations contained in Paragraphs 1 through 12 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

42. On or about September 18, 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," using any means or facility of interstate or foreign commerce, did knowingly distribute, child pornography, that is, visual depictions, the production of which involved the use of MV1, who had not yet attained the age of 18, engaging in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), and which

1 depicted such conduct, which had been shipped and transported in interstate or foreign
2 commerce by means of computer, or otherwise, including, but not limited to, a file entitled:

3 1020912119564214313_1020914832574251109_1020914832284856380_-
4 2191306675730928800.mp4.

5 All in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

6 COUNT 16

7 (Distribution of Child Pornography, 18 U.S.C. §§ 2252 (a)(2) and (b)(1))

8 43. The factual allegations contained in Paragraphs 1 through 12 of the Superseding
9 Indictment are re-alleged and fully incorporated by reference herein.

10 44. On or about September 18, 2022, in Tucson, within the District of Arizona, and
11 elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka
12 "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy,"
13 aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka
14 "oguser_#0," aka "screwthefbi," aka "tourist," using any means or facility of interstate or
15 foreign commerce, did knowingly distribute, child pornography, that is, visual depictions,
16 the production of which involved the use of MV9, who had not yet attained the age of 18,
17 engaging in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), and which
18 depicted such conduct, which had been shipped and transported in interstate or foreign
19 commerce by means of computer, or otherwise, including, but not limited to, a file entitled:

20 1020373314574766120_1021138679625945228_1021138679122645105_IMG_1
21 915.png; and

22 1020373771086991373_1021148831884247090_1021148831431274677_IMG_1
23 915.png.

24 All in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

25 COUNT 17

26 (Distribution of Child Pornography, 18 U.S.C. §§ 2252 (a)(2) and (b)(1))

27 45. The factual allegations contained in Paragraphs 1 through 12 of the Superseding
28 Indictment are re-alleged and fully incorporated by reference herein.

46. On or about September 20, 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," using any means or facility of interstate or foreign commerce, did knowingly distribute, child pornography, that is, visual depictions, the production of which involved the use of MV1, who had not yet attained the age of 18, engaging in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), and which depicted such conduct, which had been shipped and transported in interstate or foreign commerce by means of computer, or otherwise, including, but not limited to, a file entitled:

1021825727810768929_1021836405074309251_1021836404730363984_IMG_1993.jpg; and

1021825727810768929_1021836270223233066_1021836269753487390_IMG_2001.jpg.

All in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT 18

(Distribution of Child Pornography, 18 U.S.C. §§ 2252 (a)(2) and (b)(1))

47. The factual allegations contained in Paragraphs 1 through 12 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

48. On or about September 22, 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," using any means or facility of interstate or foreign commerce, did knowingly distribute, child pornography, that is, visual depictions, the production of which involved the use of MV1, who had not yet attained the age of 18, engaging in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), and which

depicted such conduct, which had been shipped and transported in interstate or foreign commerce by means of computer, or otherwise, including, but not limited to, a file entitled:

1020373314574766120_1022333708793020417_1022333708675588186_IMG_2152.jpg;

1022328237931638794_1022333796177154139_1022333796252659792_IMG_2152.jpg; and

1022552991254990939_1022553498824482877_1022553498509905980_IMG_2152.jpg.

All in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT 19

(Distribution of Child Pornography, 18 U.S.C. §§ 2252 (a)(2) and (b)(1))

49. The factual allegations contained in Paragraphs 1 through 12 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

50. On or about September 27, 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka “Convict,” aka “Connor,” aka “Cain,” aka “chickwit,” aka “convict764#0,” aka “cultsec,” aka “cvltsec,” aka “ecstasy,” aka “govmails#0,” aka “internetclique,” aka “internetcvlt,” aka “nikkkaokjsksni27,” aka “oguser_#0,” aka “screwthefbi,” aka “tourist,” using any means or facility of interstate or foreign commerce, did knowingly distribute, child pornography, that is, visual depictions, the production of which involved the use of MV1, who had not yet attained the age of 18, engaging in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), and which depicted such conduct, which had been shipped and transported in interstate or foreign commerce by means of computer, or otherwise, including, but not limited to, a file entitled:

unified_message_1137845660477024.mp4.

All in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT 20

(Distribution of Child Pornography, 18 U.S.C. §§ 2252 (a)(2) and (b)(1))

51. The factual allegations contained in Paragraphs 1 through 12 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

52. On or about September 29, 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," using any means or facility of interstate or foreign commerce, did knowingly distribute, child pornography, that is, visual depictions, the production of which involved the use of MV4, who had not yet attained the age of 18, engaging in sexually explicit conduct as defined in 18 U.S.C. § 2256(2), and which depicted such conduct, which had been shipped and transported in interstate or foreign commerce by means of computer, or otherwise, including, but not limited to, a file entitled:

1023335528894038157_1024835978357121064_1024835978151591946_16644
05158926.jpg.

All in violation of 18 U.S.C. §§ 2252(a)(2) and (b)(1).

COUNT 21

(Coercion and Enticement of Children, 18 U.S.C. § 2422(b))

53. The factual allegations contained in Paragraphs 1 through 12 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

54. In approximately September 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," using the mail and any facility and means of interstate and foreign commerce, did knowingly persuade, induce entice, and coerce MV4, a minor girl who had not yet attained the age of 18, to engage in sexual activity for which any person can be charged with a criminal offense, to wit: Sexual Exploitation of a Minor, under Arizona Revised Statute 13-3553.

1 All in violation of 18 U.S.C. § 2422(b).

2 COUNT 22

3 (Attempted Coercion and Enticement of a Minor, 18 U.S.C. § 2422(b))

4 55. The factual allegations contained in Paragraphs 1 through 12 of the Superseding
5 Indictment are re-alleged and fully incorporated by reference herein.

6 56. In approximately September 2022, in Tucson, within the District of Arizona, and
7 elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka
8 "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy,"
9 aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka
10 "oguser_#0," aka "screwthefbi," aka "tourist," using the mail and any facility and means
11 of interstate and foreign commerce, did knowingly attempt to persuade, induce, entice, and
12 coerce MV5, who had not attained the age of eighteen, to engage in sexual activity for
13 which any person can be charged with a criminal offense, to wit: Attempted Sexual
14 Exploitation of a Minor, under Arizona Revised Statute 13-3553.

15 All in violation of 18 U.S.C. § 2422(b).

16 COUNT 23

17 (Attempted Coercion and Enticement of a Minor, 18 U.S.C. § 2422(b))

18 57. The factual allegations contained in Paragraphs 1 through 12 of the Superseding
19 Indictment are re-alleged and fully incorporated by reference herein.

20 58. In approximately September 2022, in Tucson, within the District of Arizona, and
21 elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka
22 "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy,"
23 aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka
24 "oguser_#0," aka "screwthefbi," aka "tourist," using the mail and any facility and means
25 of interstate and foreign commerce, did knowingly attempt to persuade, induce, entice, and
26 coerce MV6, who had not attained the age of eighteen, to engage in sexual activity for
27 which any person can be charged with a criminal offense, to wit: Attempted Sexual
28 Exploitation of a Minor, under Arizona Revised Statute 13-3553.

1 All in violation of 18 U.S.C. § 2422(b).

2 COUNT 24

3 (Cyberstalking of a Child, 18 U.S.C. §§ 2261A(2) and 2261B)

4 59. The factual allegations contained in Paragraphs 1 through 12 and 18 of the
5 Superseding Indictment are re-alleged and fully incorporated by reference herein.

6 60. From on or about September 16, 2022, to October 11, 2022, in Tucson, within the
7 District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka
8 "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec,"
9 aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt,"
10 aka "nikkkaokjsksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," having
11 reached the age of 18, with the intent to kill, injure, harass, intimidate, and place under
12 surveillance with intent to kill, injure, harass, and intimidate another person, to wit: MV3,
13 a 13-year-old minor residing outside the State of Arizona, used the mail, any interactive
14 computer service and electronic communication service or electronic communication
15 system of interstate commerce, and any other facility of interstate or foreign commerce to
16 engage in a course of conduct that placed MV3 in reasonable fear of death and of serious
17 bodily injury and caused, attempted to cause, and would be reasonably expected to cause
18 substantial emotional distress to MV3, that is: from on or about and between September
19 16, 2022, and October 11, 2022, MARTIN engaged in a pattern of conduct wherein he used
20 the internet to send messages to and about MV3, which placed MV3 in reasonable fear that
21 death or serious bodily injury would result to MV3 and MV3's immediate family member
22 and which caused, attempted to cause, and would be reasonably expected to cause
23 substantial emotional distress to MV3.

24 All in violation of 18 U.S.C. §§ 2261A(2) and 2261B.

25 COUNT 25

26 (Cyberstalking of a Child Resulting in Permanent Disfigurement or

27 Life-Threatening Injury, 18 U.S.C. §§ 2261A(2), 2261B, and 2261(b)(2))

61. The factual allegations contained in Paragraphs 1 through 12 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

62. From on or about August 2022 through December 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka "oguser_#0," aka "screwthefbi," aka "tourist," having reached the age of 18, with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, to wit: MV1, a 13-year-old minor residing outside the United States, used the mail, any interactive computer service and electronic communication service or electronic communication system of interstate commerce, and any other facility of interstate or foreign commerce to engage in a course of conduct that placed MV1 in reasonable fear of death and of serious bodily injury to MV1, MV1's family, and MV1's pet and caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to MV1, that is: MARTIN engaged in a pattern of conduct wherein he used the internet to send messages to MV1, which placed MV1 in reasonable fear of death and serious bodily injury to MV1, MV1's family, and MV1's pet and which caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to MV1, and which resulted in permanent disfigurement and life-threatening injury to MV1.

All in violation of 18 U.S.C. §§ 2261A(2), 2261B, and 2261(b)(2).

COUNT 26

(Cyberstalking, 18 U.S.C. §§ 2261A(2) and 2261(b)(5))

63. The factual allegations contained in Paragraphs 1 through 17 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

64. In approximately September 2022, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy,"

1 aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka
2 "oguser_#0," aka "screwthefbi," aka "tourist," with the intent to kill, injure, harass,
3 intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate
4 another person, to wit: V7, used the mail, any interactive computer service and electronic
5 communication service or electronic communication system of interstate commerce, and
6 any other facility of interstate or foreign commerce to engage in a course of conduct that
7 placed V7 in reasonable fear of death and serious bodily injury and caused, attempted to
8 cause, and would be reasonably expected to cause substantial emotional distress to V7, that
9 is: in approximately September 2022, MARTIN engaged in a pattern of conduct wherein
10 he used the internet to send messages to V7, which placed V7 in reasonable fear of death
11 and serious bodily injury and which caused, attempted to cause, and would be reasonably
12 expected to cause substantial emotional distress to V7.

13 All in violation of 18 U.S.C. §§ 2261A(2) and 2261(b)(5).

14 COUNT 27

15 (Animal Crushing, 18 U.S.C. §§ 48(a)(1) and (c), and §2)

16 65. The factual allegations contained in Paragraphs 1 through 12 of the Superseding
17 Indictment are re-alleged and fully incorporated by reference herein.

18 66. On or about September 15, 2022, in Tucson, within the District of Arizona, and
19 elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka
20 "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec," aka "ecstasy,"
21 aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaokjsksni27," aka
22 "oguser_#0," aka "screwthefbi," aka "tourist," aided, abetted, counseled, commanded,
23 induced, and procured the commission of Animal Crushing, as that term is defined in 18
24 U.S.C. § 48(f), upon a pet hamster using any interactive computer service and electronic
25 communication service or electronic communication system of interstate commerce, and
26 any other facility of interstate or foreign commerce, in violation of 18 U.S.C. § 48(a)(1).

67. In furtherance of this violation, and to effect the objectives thereof, MARTIN and others, known and unknown, committed and caused to be committed, among others, the following:

- a. On or about September 15, 2022, during a group video call with approximately fifteen other 764 Enterprise members, MARTIN forced MV1 to join the chat or MARTIN was going to leak everything about MV1.
- b. MV1 joined the call, and MARTIN and the 764 members forced MV1 into letting MV1's dog attack the family's pet hamster.
- c. Initially, MARTIN and the Enterprise members wanted MV1 to bite off the hamster's head but MV1 refused.
- d. MARTIN and the 764 members then directed MV1 to stomp the hamster's head and feed the hamster to MV1's dog.
- e. Less than thirty minutes after MV1 was forced to join the call, MARTIN messaged MV1, "LOL IM SO SORRY. FOR YOUR LOSS. LMAO."
- f. MARTIN's records revealed social media platform messages wherein MV1 asked MARTIN how to dispose of the hamster's body and that MV1 felt sick, to which MARTIN responded, "LOL."
- g. When MV1 displayed remorse over being forced into crushing the pet hamster, MARTIN said MV1 could not prove MV1 was forced into killing the hamster and told MV1 he now had evidence to send MV1 to a mental hospital.

All in violation of 18 U.S.C. §§ 48(a)(1) and (c), and §2.

COUNT 28

(Distribution of Animal Crush Videos, 18 U.S.C. §§ 48(a)(3) and (c))

68. The factual allegations contained in Paragraphs 1 through 12 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

69. From on or about September 15, 2022 and onward, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka "Convict," aka "Connor," aka "Cain," aka "chickwit," aka "convict764#0," aka "cultsec," aka "cvltsec,"

aka “ecstasy,” aka “govmails#0,” aka “internetclique,” aka “internetcvlt,” aka “nikkkaokjsksni27,” aka “oguser_#0,” aka “screwthefbi,” aka “tourist,” knowingly sold, marketed, advertised, exchanged, and distributed an animal crush video, as defined in 18 U.S.C. § 48(f), in and using a means and facility of interstate or foreign commerce, including:

1021994876780417045_1021998248237465661_1021998247990014072_image0.gif.

70. In furtherance of this violation, and to effect the objectives thereof, MARTIN committed and caused to be committed, among others, the following:

- a. In the weeks following the crushing of MV1’s hamster, MARTIN distributed a video multiple times to other 764 members that showed a foot stomping a hamster.
- b. On or about September 21, 2022, during a separate social media conversation with another 764 member, MARTIN sent the video of a foot stomping on a hamster along with the statement, “made a bitch. feed [their] hamster. to [their] dog. LOL.”

All in violation of 18 U.S.C. §§ 48(a)(3) and (c).

COUNT 29

(Conspiracy to Commit Wire Fraud, 18 U.S.C. §§ 1349 and 1343)

71. The factual allegations contained in Paragraphs 1 through 12 of the Superseding Indictment are re-alleged and fully incorporated by reference herein.

The Scheme

72. From February 2023 to on or about December 11, 2024, in Tucson, within the District of Arizona, and elsewhere, the defendant BARON CAIN MARTIN, aka “Convict,” aka “Connor,” aka “Cain,” aka “chickwit,” aka “convict764#0,” aka “cultsec,” aka “cvltsec,” aka “ecstasy,” aka “govmails#0,” aka “internetclique,” aka “internetcvlt,” aka “nikkkaokjsksni27,” aka “oguser_#0,” aka “screwthefbi,” aka “tourist,” MARTIN agreed with others known and unknown, to devise and intended to devise a scheme to

1 defraud victims and to obtain money and property by means of materially false and
2 fraudulent pretenses, representations and promises, in violation of 18 U.S.C. § 1343, and
3 further willfully joined the agreement knowing of its unlawful purpose and with the
4 intention that its unlawful purpose be accomplished, and for the purpose of executing the
5 scheme to defraud, and attempting to do so, caused to be transmitted writings, signals, and
6 sounds by means of a wire communication in interstate commerce.

7 Manner and Means

8 73. It was part of the scheme that:

- 9 a. The defendant BARON CAIN MARTIN and his co-conspirators would hack
10 into cryptocurrency accounts for the purpose of stealing cryptocurrency from
11 account holders using a wire communication in interstate commerce.
12 b. To hack into the victims' cryptocurrency accounts, MARTIN and his co-
13 conspirators would use social engineering or SIM-swap the victims' phones
14 to gain access to the victims' accounts.
15 c. A SIM-swap (or SIM hijacking or SIM-swapping attack) is a type of fraud
16 where fraudsters convince a mobile carrier to transfer a victim's phone
17 number to a SIM card they control. This allows the fraudsters to intercept
18 calls, text messages, and security codes sent to the victim's number to gain
19 access to the victim's bank accounts, social media, or other online accounts.

20 74. From on or about February 2023 to on or about December 11, 2024, in Tucson, in
21 the District of Arizona and elsewhere, MARTIN and his co-conspirators, for the purpose
22 of executing the scheme to defraud, and attempting to do so, caused to be transmitted by
23 means of a wire communication in interstate commerce the writings, signals, and sounds.

24 75. In furtherance of the scheme to defraud, in approximately February 2023, MARTIN
25 and Conspirator 1 chose three target victims and shared the personal information related to
26 the three victims with each other over a social media platform.

27 76. To further their scheme, MARTIN and Conspirator 1 chose additional conspirators,
28 including Conspirator 2, to help them accomplish their scheme.

1 77. Between on or about February 19, 2023, to on or about February 27, 2023, using a
2 social media platform, MARTIN used a wire communication to write and share a script for
3 him and his conspirators to use during the execution of their scheme.

4 78. Between on or about February 19, 2023, to on or about February 27, 2023, using a
5 social media platform and his cellular phone, MARTIN did attempt to call the victims'
6 phone companies to hack into the victims' phone accounts in order to obtain additional
7 personal identifying information to gain access to the victims' cryptocurrency accounts.

8 79. On or about February 27, 2023, in furtherance their scheme, MARTIN, by means
9 of materially false and fraudulent pretenses, representations, and promises, unlawfully
10 obtained the security code for one of their victim's phone accounts.

11 80. In approximately March 2024, using a social media platform, MARTIN provided
12 advice to other Enterprise members on how to successfully commit cryptocurrency fraud.

13 All in violation of 18 U.S.C. §§ 1349 and 1343.

14 FORFEITURE ALLEGATION

15 81. Upon conviction of Counts One, Five through Nine, and Counts Ten through
16 Twenty of this Indictment, defendant, Baron Cain Martin, aka "Convict", aka "Connor",
17 aka "Cain", aka "chickwit", aka "convict764#0", aka "cultsec", aka "ecstasy", aka
18 "govmails#0", aka "internetclique", aka "internetcvlt", aka "nikkkaokjsksni27",
19 "oguser_#0", "screwthefbi", aka "tourist", shall forfeit to the United States pursuant to 18
20 U.S.C. §§ 2253(a)(2) and (a)(3):

- 21 a. any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, or any
22 book, magazine, periodical, film, videotape, or other matter which contains any
23 such visual depiction, which was produced, transported, mailed, shipped or
24 received in violation of Title 18, United States Code, Chapter 110;
- 25 b. any property, real or personal, constituting or traceable to gross profits or other
26 proceeds obtained from the offenses; and
- 27 c. any property, real or personal, used or intended to be used to commit or to
28 promote the commission of the offenses.

82. Upon conviction of Counts Two and Three of this Indictment, Baron Cain Martin, aka "Convict," aka "Connor," aka "Cain," "chickwit," aka "convict764#0," aka "cultsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaikjsksni27," aka "oguser_#0," aka "screwthefbi," and aka "tourist," shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(G) and 28 U.S.C. § 2461(c) all assets, foreign, or domestic:

- a. of any individual, entity, or organization engaged in planning or perpetrating any federal crime of terrorism against the United States, citizens, or residents of the United States, or their property, and all assets, foreign or domestic, affording any person a source of influence over any such entity or organization;
- b. acquired or maintained by any person with the intent and for the purpose of supporting, planning, conducting, or concealing any federal crime of terrorism against the United States, citizens or residents of the United States, or their property;
- c. derived from, involved in, used or intended to be used to commit any federal crime of terrorism against the United States, citizens or residents of the United States, or their property; or
- d. of any individual, entity, or organization engaged in planning or perpetrating any act of international terrorism against any international organization, or against any foreign government. Where the properties sought for forfeiture are located beyond the territorial boundaries of the United States, an act in furtherance of such planning or perpetration must have occurred within the jurisdiction of the United States.

83. Upon conviction of Counts Three, Four, Twenty-One, and Twenty-Nine of this Indictment, Baron Cain Martin, aka "Convict," aka "Connor," aka "Cain," "chickwit," aka "convict764#0," aka "cultsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaikjsksni27," aka "oguser_#0," aka "screwthefbi," and aka "tourist," shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28

U.S.C. § 2461(c) any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. §§ 956(a)(1) and (a)(2) or any offense constituting "specified unlawful activity," or conspiracy to commit such offense.

84. Upon conviction of Count Four of this Indictment, Baron Cain Martin, aka "Convict," aka "Connor," aka "Cain," "chickwit," aka "convict764#0," aka "cultsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaikjsksni27," aka "oguser_#0," aka "screwthefbi," and aka "tourist," shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of the offense.

85. Upon conviction of Count Twenty-One of this Indictment, Baron Cain Martin, aka "Convict," aka "Connor," aka "Cain," "chickwit," aka "convict764#0," aka "cultsec," aka "ecstasy," aka "govmails#0," aka "internetclique," aka "internetcvlt," aka "nikkkaikjsksni27," aka "oguser_#0," aka "screwthefbi," and aka "tourist," shall forfeit to the United States pursuant to 18 U.S.C. §§ 2428(a)(1) and (a)(2):

- a. any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offenses; and
- b. any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offenses.
- c. The property to be forfeited includes, but is not limited to:
 - i. a Silver USB Drive 16GB "INFINITIVE;"
 - ii. a Dell Inspiron laptop black ST: FWTPQM3 EX: 34636562427;
 - iii. a Cricket Sim Card 8901150327 7520657526;
 - iv. a Black video camera model: HDV-6045 60420230600930;
 - v. a Dell Inspiron laptop silver ST: JK10SL3 w/ power cord EX: 42569904567;
 - and
 - vi. an iPhone 11 (serial number DX3HCNQVN72J).

86. 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

1 or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of
2 the court; d) has been substantially diminished in value; or e) has been commingled with
3 other property which cannot be divided without difficulty, it is the intent of the United
4 States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. §§2253(b) and by 28
5 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value
6 of the above forfeitable property including, but not limited to, all property, both real and
7 personal, owned by the defendant.

8 All pursuant to 18 U.S.C. §§ 2253(a)(2) and (a)(3), 981(a)(1)(C) and (a)(1)(G),
9 924(d), 2428(a)(1) and (a)(2), 28 U.S.C. § 2461(c), and Rule 32.2(a), Federal Rules of
10 Criminal Procedure.

11 A TRUE BILL

12
13 /s/
14 FOREPERSON OF THE GRAND JURY
Dated: October 29, 2025

15 TIMOTHY COURCHAINED
16 United States Attorney
District of Arizona

REDACTED FOR
PUBLIC DISCLOSURE

17
18 /s/
LIZA M. GRANOFF
19 KEVIN D. SCHIFF
Assistant U.S. Attorneys