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FILED

NOV 16 2021

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Case No. **21 CR 515 GKF**

Plaintiff,

v.

ROY EDWARD WILLIAMS,

Defendant.

INDICTMENT

[COUNTS ONE, THREE, FIVE,  
SIX, and EIGHT: 18 U.S.C. §§  
1151, 1153, and 2422(b) – Coercion  
and Enticement of a Minor in  
Indian Country;

COUNTS TWO, FOUR, NINE,  
and TEN: 18 U.S.C. §§ 1151, 1153,  
and 2241(c) – Aggravated Sexual  
Abuse of a Minor in Indian  
Country;

COUNT SEVEN: 18 U.S.C. §§  
1151, 1153, and 2244(a)(3) –  
Abusive Sexual Contact of a Minor  
Between 12 and 16 Years Old in  
Indian Country;

COUNT ELEVEN: 18 U.S.C. §§  
1151, 2252(a)(4), and 2252(b)(2) –  
Possession of Child Pornography;  
Forfeiture Allegation: 18 U.S.C. §§  
2253(a)(2) and (3) – Child  
Exploitation Forfeiture]

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. §§ 1151, 1153, and 2422(b)]

From on or about November 7, 2002, to on or about November 7, 2004, within  
Indian Country in the Northern District of Oklahoma, the defendant, **ROY  
EDWARD WILLIAMS**, an Indian, knowingly persuaded, induced, enticed, and  
coerced Minor Victim-1, a minor known to the Grand Jury who had not attained the

age of 18 years, to engage in any sexual activity for which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2422(b).

**COUNT TWO**  
**[18 U.S.C. §§ 1151, 1153, and 2241(c)]**

From on or about November 7, 2002, to on or about November 7, 2004, within Indian Country in the Northern District of Oklahoma, the defendant, **ROY EDWARD WILLIAMS**, an Indian, knowingly engaged in, and attempted to engage in, sexual acts with Minor Victim-1, a minor known to the Grand Jury who had not attained the age of 12 years, by intentionally touching her vulva with his hands and contacting and touching her vulva with his mouth with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2241(c).

**COUNT THREE**  
**[18 U.S.C. §§ 1151, 1153, and 2422(b)]**

From on or about June 30, 2010, to on or about June 30, 2016, more exact dates being unknown to the Grand Jury, within Indian Country in the Northern District of Oklahoma, the defendant, **ROY EDWARD WILLIAMS**, an Indian, knowingly persuaded, induced, enticed, and coerced Minor Victim-2, a minor known to the Grand Jury who had not attained the age of 18 years, to engage in any sexual activity for which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2422(b).

**COUNT FOUR**  
**[18 U.S.C. §§ 1151, 1153, and 2241(c)]**

From on or about June 30, 2010, to on or about June 30, 2016, more exact dates being unknown to the Grand Jury, within Indian Country in the Northern District of Oklahoma, the defendant, **ROY EDWARD WILLIAMS**, an Indian, knowingly engaged in, and attempted to engage in, sexual acts with Minor Victim-2, a minor known to the Grand Jury who had not attained the age of 12 years, by intentionally touching her vulva with his hands, contacting and penetrating her vulva with his fingers, and licking her vulva with his mouth with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2241(c).

**COUNT FIVE**  
**[18 U.S.C. §§ 1151, 1153, and 2422(b)]**

From on or about December 19, 2013, to on or about December 19, 2014, within Indian Country in the Northern District of Oklahoma, the defendant, **ROY EDWARD WILLIAMS**, an Indian, knowingly persuaded, induced, enticed, and coerced Minor Victim-3, a minor known to the Grand Jury who had not attained the age of 18 years, to engage in any sexual activity for which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2422(b).

**COUNT SIX**  
**[18 U.S.C. §§ 1151, 1153, and 2422(b)]**

From on or about December 31, 2013, to on or about December 31, 2015, more exact dates being unknown to the Grand Jury, within Indian Country in the Northern District of Oklahoma, the defendant, **ROY EDWARD WILLIAMS**, an Indian, knowingly persuaded, induced, enticed, and coerced Minor Victim-4, a minor known to the Grand Jury who had not attained the age of 18 years, to engage in any sexual activity for which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2422(b).

**COUNT SEVEN**  
**[18 U.S.C. §§ 1151, 1153, and 2244(a)(3)]**

On or about December 31, 2013, to on or about December 31, 2015, more exact dates being unknown to the Grand Jury, within Indian Country in the Northern District of Oklahoma, the defendant, **ROY EDWARD WILLIAMS**, an Indian, knowingly engaged in, and attempted to engage in, sexual contact with Minor Victim-4, a child known to the Grand Jury who had attained the age of 12 years, but had not attained the age of 16 years and was at least four years younger than **WILLIAMS**, by intentionally touching, directly and through the clothing, her breasts with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2244(a)(3).

**COUNT EIGHT**  
**[18 U.S.C. §§ 1151, 1153, and 2422(b)]**

From on or about May 28, 2015, to on or about December 31, 2018, more exact dates being unknown to the Grand Jury, within Indian Country in the Northern District of Oklahoma, the defendant, **ROY EDWARD WILLIAMS**, an Indian, knowingly persuaded, induced, enticed, and coerced Minor Victim-5, a minor known to the Grand Jury who had not attained the age of 18 years, to engage in any sexual activity for which any person could be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2422(b).

**COUNT NINE**  
**[18 U.S.C. §§ 1151, 1153, and 2241(c)]**

From on or about May 28, 2015, to on or about May 28, 2016, within Indian Country in the Northern District of Oklahoma, the defendant, **ROY EDWARD WILLIAMS**, an Indian, knowingly engaged in, and attempted to engage in, sexual acts with Minor Victim-5, a minor known to the Grand Jury who had not attained the age of 12 years, by intentionally touching her vulva with his hands and intentionally licking and biting her vulva with his mouth with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2241(c).

**COUNT TEN**  
**[18 U.S.C. §§ 1151, 1153, and 2241(c)]**

From on or about May 28, 2016, to on or about December 31, 2018, within Indian Country in the Northern District of Oklahoma, the defendant, **ROY EDWARD WILLIAMS**, an Indian, knowingly engaged in, and attempted to engage in, sexual acts with Minor Victim-5, a minor known to the Grand Jury who attained the age of 12 years, but had not attained the age of 16 years and was at least four years younger than **WILLIAMS**, by intentionally touching her vulva with his hands, intentionally licking and biting her vulva with his mouth, and forcing her to touch his genitalia with her hands, with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

All in violation of Title 18, United States Code, Sections 1151, 1153, and 2241(c).

**COUNT ELEVEN**  
**[18 U.S.C. §§ 1151, 2252(a)(4), and 2252(b)(2)]**

On or about June 24, 2019, within Indian Country in the Northern District of Oklahoma, the defendant, **ROY EDWARD WILLIAMS**, knowingly possessed visual depictions of minors engaging in sexually explicit conduct in one or more image files and video files.

All in violation of Title 18, United States Code, Sections 1151, 2252(a)(4), and 2252(b)(2).

**FORFEITURE ALLEGATION**  
**[18 U.S.C. § 2253(a)(2) and (3)]**

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a)(2) and (3).

Upon conviction of the offenses alleged in this Indictment, as a part of his sentence, the defendant, **ROY EDWARD WILLIAMS**, shall forfeit to the United States any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations and any property, real or personal, that was used or intended to be used to commit or to facilitate the violations of federal law. The property to be forfeited includes, but is not limited to:

**REAL PROPERTY**

All that lot and parcel of land, together with all buildings, appurtenances, improvements, fixtures, attachments and easements thereon, and all rights appertaining thereto, located at 426656 East 230 Road, Vinita, Craig County, Oklahoma.

**ELECTRONICS**


Any computers, laptops, cellular phones, cameras, and all peripheral equipment, including electronic devices.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendant shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendant, the property described above, or any portion thereof, cannot be located upon the exercise

of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Section 2253(a)(2) and (3).

CLINTON J. JOHNSON  
Acting United States Attorney



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LEAH PAISNER  
Assistant United States Attorney

A TRUE BILL

*/s/ Grand Jury Foreperson*  
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Grand Jury Foreperson