

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

JOHN DOE K, by and through his guardians,)
JOHN DOE KT AND JANE DOE LT,)

Case No. _____

Plaintiff,)

Judge

v.)

COMPLAINT

GREGG ALAN LARSEN, and Downloader 1,)
Downloader 2, Downloader 3, Downloader 4,)
Downloader 5, Downloader 6, Downloader 7,)
Downloader 8, Downloader 9, Downloader 10,)
Downloader 11, Downloader 12, Downloader 13,)
Downloader 14, Downloader 15, Downloader 16,)
Downloader 17, Downloader 18, Downloader 19,)
Downloader 20, Downloader 21, Downloader 22,)
Downloader 23, Downloader 24, Downloader 25,)
Downloader 26, Downloader 27, Downloader 28,)
Downloader 29, Downloader 30, Downloader 31,)
Downloader 32, Downloader 33, Downloader 34,)
Downloader 35, Downloader 36, Downloader 37,)
Downloader 38, Downloader 39, Downloader 40,)
Downloader 41, Downloader 42, Downloader 43,)
Downloader 44, Downloader 45, Downloader 46,)
Downloader 47, Downloader 48, Downloader 49,)
Downloader 50, Downloader 51, Downloader 52,)
Downloader 53, Downloader 54, Downloader 55,)
Downloader 56, Downloader 57, Downloader 58,)
Downloader 59, Downloader 60, Downloader 61,)
Downloader 62, Downloader 63, Downloader 64,)
Downloader 65, Downloader 66, Downloader 67,)
Downloader 68, Downloader 69, Downloader 70,)
Downloader 71, Downloader 72, Downloader 73,)
Downloader 74, Downloader 75, Downloader 76,)
Downloader 77, Downloader 78, Downloader 79,)
Downloader 80, Downloader 81, Downloader 82,)
Downloader 83, Downloader 84, Downloader 85,)
Downloader 86, Downloader 87, Downloader 88,)
Downloader 89, Downloader 90, Downloader 91,)
Downloader 92, Downloader 93, Downloader 94,)
Downloader 95, Downloader 96, Downloader 97,)
Downloader 98, Downloader 99, Downloader 100,)

Defendants.)

Plaintiff, for his causes of action against Defendants, alleges that:

PARTIES

1. Plaintiff John Doe K is a minor male resident of the State of Minnesota who brings this lawsuit through his guardians John Doe KT and Jane Doe LT. The true identity of the Plaintiff and his guardians is being withheld on the grounds that John Doe K is a minor and a victim of the sex crimes described herein.

2. At all times material, Defendant Gregg Alan Larsen is an adult male resident of the State of Minnesota.

3. At all times material, Defendant Downloaders 1-100 are persons who downloaded and possessed sexually explicit child pornographic images of the Plaintiff whose names are currently unknown, but who will be named once their identities are discovered.

JURISDICTION

4. Plaintiff brings his complaint under federal question jurisdiction, pursuant to federal laws 18 USC §§ 2251, 2252A and 2255.

FACTS

5. Defendant Larsen was a teacher of special education at St. Paul Central High School.

6. Defendant Larsen was a foster parent.

7. Plaintiff's mother provided day care to Defendant Larsen's children and foster children.

8. Occasionally, the Plaintiff would go with Defendant Larsen swimming and Plaintiff would occasionally spend the night with Defendant Larsen and his children.

9. While Plaintiff was at Defendant Larsen's home, Defendant Larsen engaged the

Plaintiff in sexually explicit conduct.

10. While the minor Plaintiff was engaged in sexually explicit conduct, Defendant Larsen, created visual depictions of the sexually explicit conduct.

11. Defendant Larsen uploaded the sexually explicit images to his computer and Defendant Larsen distributed the sexually explicit images of the minor Plaintiff over the internet to various child pornography websites.

12. Downloaders 1 through 100 received and viewed the sexually explicit images of the minor Plaintiff.

13. Plaintiff has been damaged as described herein as a result of the production, distribution, receipt and viewing of the sexually explicit images of the minor Plaintiff.

**COUNT I – PRODUCTION OF CHILD PORNOGRAPHY IN
VIOLATION OF 18 U.S.C.A. §§ 2251 AND 2255**

14. Plaintiff incorporates all paragraphs of this Complaint as if fully set forth herein.

15. Defendant Larsen used minor Plaintiff to engage in sexually explicit conduct of which Defendant produced numerous visual depictions.

16. Defendant Larsen then uploaded these sexually explicit images to a computer that was connected to the internet.

17. Defendant Larsen knew or had reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, and/or that the visual depiction was produced or transmitted using materials that have been mailed, shipped or transported in or affecting interstate or foreign commerce by any means, including a computer.

18. Defendant Larsen's acts violated 18 U.S.C.A. §§ 2251 (a) and 2255.

19. As a direct result of Defendant Larsen's violations described herein, Plaintiff has

suffered and will continue to suffer severe emotional distress, shock, embarrassment, loss of self-esteem, disgrace, humiliation and loss of enjoyment of life, was prevented and will continue to be prevented from performing his normal daily activities and obtaining the full enjoyment of life, and has incurred and will continue to incur expenses for medical and psychological treatment, therapy and counseling.

**COUNT II: DOWNLOADING AND DISTRIBUTING CHILD
PORNOGRAPHY IN VIOLATION OF 18 U.S.C.A. §§ 2252A AND 2255**

20. Plaintiff incorporates all paragraphs of this Complaint as if fully set forth herein.

21. Defendant Larsen and Downloaders 1–100 knowingly received and/or distributed sexually explicit visual depictions of the minor Plaintiff engaged in sexually explicit conduct which constitutes child pornography.

22. Defendants knew or had reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, and/or that the visual depiction was produced or transmitted using materials that have been mailed, shipped or transported in or affecting interstate or foreign commerce by any means, including a computer.

23. Defendants acts violated 18 U.S.C.A. §§ 2252A and 2255.

24. As a direct result of Defendants violations described herein, Plaintiff has suffered and will continue to suffer severe emotional distress, shock, embarrassment, loss of self-esteem, disgrace, humiliation and loss of enjoyment of life, was prevented and will continue to be prevented from performing his normal daily activities and obtaining the full enjoyment of life, and has incurred and will continue to incur expenses for medical and psychological treatment, therapy and counseling.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff demands judgment against Defendants individually, jointly and severally in an amount in excess of \$150,000 plus costs, disbursements, reasonable attorneys fees, interest, and whatever other relief the Court deems just and equitable.

JURY DEMAND

Plaintiff demands trial by jury for all claims alleged.

Dated: May 26, 2010.

JEFF ANDERSON AND ASSOCIATES, P.A.

s/Patrick W. Noaker

By: Jeffrey R. Anderson, #2057

Patrick W. Noaker, # 274951

Attorneys for Plaintiff

366 Jackson Street, Suite 100

St. Paul, Minnesota 55101

(651) 227-9990