

UNITED STATES DISTRICT COURT
for the
Eastern District of California

FILED
Jul 05, 2023
CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SEALED

United States of America
v.
BRADLEY EARL REGER
Defendant(s)

Case No.
2:23-mj-0099 DB

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.
On or about the date(s) of October 31 – November 7, 2009 in the
Eastern District of California and elsewhere, the defendant violated:

Code Section Offense Description
18 U.S.C. § 2423(c) Engaging in Illicit Sexual Conduct in Foreign Places

This criminal complaint is based on these facts:
(see attachment)

[X] Continued on the attached sheet.

/s/ Russell Quiniola
Complainant's signature

Russell Quiniola, Special Agent,
Federal Bureau of Investigation
Printed name and title

Sworn to me and signed via telephone.

Date: July 5, 2023

Judge's signature

City and state: Sacramento, California

Deborah Barnes, U.S. Magistrate Judge
Printed name and title

**AFFIDAVIT OF FBI SPECIAL AGENT RUSSELL QUINIOLA
IN SUPPORT OF CRIMINAL COMPLAINT**

INTRODUCTION

I, Russell Quiniola, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since March of 2016. I am currently assigned to the Sacramento Division. While employed by the FBI, I have investigated federal criminal violations related to, among other things, violent crimes, child exploitation, kidnapping, and human trafficking. I have gained experience through training at the FBI Academy as well as through my work related to conducting these types of investigations and others. I have attended trainings on the use of investigative methods such as the online forensic tools to search and identify perpetrators and victims of child sex crimes. I have presented training courses on methods and procedures used for investigating federal human trafficking violations and coordinating resources for joint federal and state investigations of child exploitation crimes. Further, I am a federal law enforcement officer who is engaged in enforcing federal criminal laws, including 18 U.S.C. § 2422 and 18 U.S.C. § 2423 and I am authorized to request a federal search warrant.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other investigators and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the criminal complaint and does not set forth all of my knowledge about this matter.

BACKGROUND OF THE INVESTIGATION

3. Bradley Earl Reger [“Reger”], the defendant, sexually abused more than a dozen male patients between the ages of twelve and twenty-two under the guise of conducting purported medical examinations at his medical clinic in Susanville, CA, and in hotel rooms and camp sites all over the world. For years, up to and including at least 2020, Reger enticed and induced multiple victims to travel out of California on camping trips or church affiliated missions, where he would conduct unlawful sexual abuse in the guise of medical treatment. Additionally, from at least in or about 2009, up to and including in or about 2018, Reger enticed and induced victims to travel in interstate and foreign

1 commerce to his medical offices in Susanville, California, a city within the Eastern District of
2 California, with a significant or motivating purpose of subjecting them to unlawful sexual abuse.

3 4. Reger is a licensed Nurse Practitioner with the California Board of Registered Nursing
4 and has been since at least 2003. He has owned and operated several ambulance and flight ambulance
5 businesses in Northeastern California and Northern Nevada, to include Mountain Lifeflight, Lassen
6 Ambulance Service, Mountain EMS, Inc., and Mountain Lifeflight of Nevada for over three decades. He
7 operated these businesses from offices in Susanville, CA. Since at least 1986, Reger has been heavily
8 involved in various Christian schools, summer camps, youth groups, and church missions. He has held
9 positions as a teacher, camp counselor, wrestling coach, church deacon, youth group leader, board
10 member of various school boards, and owner of affiliated non-profit organizations.

11 5. On October 18th, 2022, the General Counsel for Church of the Nazarene based in Kansas,
12 USA [“Church”], reported Reger for possible sexual abuse to Lassen County Child Protective Services
13 [“CPS”] and to the Board of Registered Nursing, part of the California Department of Consumer Affairs
14 [“DCA”]. CPS forwarded the allegation to Lassen County Sheriff’s Office, which then contacted the
15 FBI Sacramento Field Office on or around November 1, 2022. Also in early November, DCA requested
16 assistance from U.S. Homeland Security Investigations [“HSI”] Sacramento to investigate the national
17 and international criminal allegations. By mid-November of 2022, FBI, DCA, and HSI had all opened
18 full investigations into the matter and had begun coordinating a joint criminal investigation [“Joint
19 Investigation”] of REGER concerning allegations of sexual abuse of minors and adults.

20 6. On or about February 28, 2022, Victim #5¹ informed Church executive management that
21 Reger had groomed him for sexual abuse when he was a minor and had sexually abused him under the
22 guise of medical treatment, with escalating conduct from 2016 through 2020. The Church began an
23 internal investigation of allegations of Reger’s abuse in June of 2022.

24 7. The Church’s internal investigators, the Fact Finding Ministry [FFM], identified between
25 ten and fifteen minor victims and several more adult victims that alleged that Reger abused them under
26

27 1 The full names of the victims are known to me but not included in this affidavit, which is being
28 publicly filed. Instead, the victims will be referred to by victim numbers, according to a spreadsheet
developed during the joint investigation into Reger.

1 the guise of medical treatment or examination. Further, the victims were abused during, or in connection
2 with, interstate or international travel. FFM informed the Joint Investigation that there were several
3 potential victims that had not yet been identified because FFM's investigation had focused only on
4 victims within the Church and did not include other religious affiliated organizations such as schools,
5 summer camps, and clinics, for which Reger had worked as a medical professional, teacher, or
6 counselor.

7 8. In mid-November of 2022, the Joint Investigation discovered that the Susanville Police
8 Department initiated criminal investigations of Reger in 2003, 2006, and 2007 based on multiple
9 independent allegations of sexual abuse of minors.² I reviewed the 2003, 2006, and 2007 Susanville PD
10 reports, which contained multiple complaints against Reger for abusing approximately twelve minor
11 boys while he was in a position of trust, such as a teacher, wrestling coach, employer, or camp
12 counselor. However, to my knowledge, none of these investigations resulted in criminal charges against
13 Reger.

14 9. The Joint Investigation requested and received copies of the known Susanville PD reports
15 and all known reports and recordings from the FFM investigation. The Joint Investigation reinterviewed
16 approximately eight of the victims identified by FFM and interviewed law enforcement officers from the
17 2006 Susanville Investigation. These interviews revealed a consistent pattern of behavior that Reger
18 used to identify and groom his victims and detailed reoccurring methods that he used to sexually abuse
19 them under the guise of legitimate medical treatment.

20 **PROBABLE CAUSE FOR A VIOLATION OF 18 U.S.C. § 2423(c)**

21 10. I submit there is probable cause to believe that between on or about October 31, 2009,
22 through November 7, 2009, BRADLEY EARL REGER [Reger] engaged in illicit sexual conduct in a
23 foreign place, the Philippines, in violation of 18 U.S.C. § 2423(c). Specifically, Reger knowingly
24 engaged in a sexual act with Minor Victim #3, who was between twelve and sixteen years old and was
25 more than four years younger than Reger, in violation of 18 U.S.C. § 2243(a). In this instance, the sexual
26

27 ² Susanville PD and Lassen County Sheriff's Office also investigated Reger in 1986 on
28 allegations of sexual abuse of a minor. However, a written police report on this incident could not be located.

1 act was the intentional touching, not through the clothing, of genitalia with the intent to arouse or gratify
2 the sexual desire, as defined in 18 U.S.C. § 2246(2)(D).

3 11. The joint investigation interviewed Minor Victim #3, who primarily grew up in a foreign
4 country. He first met Reger in 2008, when he was around eleven years old, when Reger and the
5 Susanville Church's pastor at the time came to visit the foreign country. While there, Reger told Minor
6 Victim #3's parents that boys need exposure to outdoor adventure and discussed the camping trips he led
7 in Alaska. Reger invited Minor Victim #3 and his brother, Minor Victim #4, to join him on one of these
8 excursions in 2009. Minor Victim #3 was too young for this first Alaska trip but joined them the
9 following summer of 2010 when he was thirteen. Reger paid all expenses for Minor Victim #3 and
10 Minor Victim #4, including flights into and out of Reno, meals, and hotels, and drove them to and from
11 the Reno, Nevada airport. Minor Victims #3 and #4 were grateful for Reger's generosity.

12 12. During each trip that Minor Victim #3 participated on with Reger, including his trip to
13 Alaska, Minor Victim #3 was subjected to a physical exam conducted by Reger. This exam usually
14 consisted of two parts. The first was a medical checkup, during which Reger took a urine test and
15 conducted a genital inspection. Minor Victim #3 remembered the genital inspection included touching of
16 the testicles and penis. As a result of one of the urine tests, Reger "diagnosed" Minor Victim #3 with a
17 UTI, although he did not remember having any symptoms. The second part of the physical exam was a
18 mole inspection. Reger looked over Minor Victim #3's entire nude body for moles. Reger noticed a
19 mole on Minor Victim #3's penis, which Reger described as concerning. Each time he conducted the
20 mole inspection, Reger used his hands to move around his penis and instructed Minor Victim #3 to get
21 an erection so he could better view the mole. During later trips, only a mole inspection was conducted.

22 13. In September 2009,³ Reger invited Minor Victim #3 and his family to join a medical
23 assistance mission to the Philippines. Reger bought plane tickets for Minor Victim #3 and his family,
24 plus other Church members and medical providers, to travel to the Philippines from October 31, 2009 to
25

26
27

3 Minor Victim #3 and his family initially stated that this trip occurred in 2010. Hotel, credit
28 card, and airline records confirm that this trip happened between October 31, 2009 and November 7,
2009.

1 November 7, 2009. Reger's group provided medical supplies to clinics around the Philippines and
2 handed out religious materials. At the time, Minor Victim #3 was 12 years old.

3 14. When he arrived in the Philippines, Minor Victim #3 had a cough that Reger diagnosed
4 as pneumonia. He advised Minor Victim #3's family to let Minor Victim #3 stay with him in his Manila
5 hotel room instead of traveling to a local clinic with the rest of his family. Minor Victim #3 stayed
6 multiple nights in the hotel with Reger.

7 15. While in the hotel with Reger, under the guise of medical treatment for pneumonia, Reger
8 conducted a physical exam on Minor Victim #3, including a mole inspection. During the mole
9 inspection, Reger requested that Minor Victim #3 get an erection so Reger could better view the mole
10 and handled Minor Victim #3's erect penis with his hand, not through the clothes and without gloves.
11 Reger then instructed Minor Victim #3 to put his clothes on and gave him a long hug with a prayer.

12 16. This "exam" process repeated on every trip and continued at random times in hotel rooms
13 or camper vans whenever Minor Victim #3 saw Reger. Reger continually discussed the dangers of skin
14 cancer. He said the mole on Minor Victim #3's penis could cause impotence or otherwise affect sexual
15 experience if it got bad. At the end of each exam, Reger noted the mole on his penis was concerning and
16 needed further monitoring.

17 **CONCLUSION**

18
19 17. Based on the above, I respectfully submit that there is probable cause that BRADLEY
20 EARL REGER, committed the crime of illicit criminal conduct in a foreign place, in violation of 18
21 U.S.C. § 2423(c).

22 18. I request that the Court issue an arrest warrant for REGER.

23
24 I swear, under penalty of perjury, that the foregoing Information is true and correct, to the best of
25 my knowledge, information and belief.

26 **REQUEST FOR SEALING**

27 It is respectfully requested that this Court issue an order sealing, until further order of the Court,
28 the Complaint, Complaint affidavit and Arrest Warrant. I believe that sealing these documents is

1 necessary to prevent potential destruction of evidence, and enable a safe arrest. Premature disclosure of
2 the contents of this affidavit and related documents may have a significant and negative impact on the
3 investigation.

4 /s/ Russell Quiniola

5 _____
6 Russell Quiniola
7 Special Agent, Federal Bureau of Investigation

8 Subscribed and sworn to before me on: July 5, 2023 by telephone pursuant to Fed. R. Crim. P.
9 41(d)(3).

10 

11 _____
12 Honorable DEBORAH BARNES
13 United States Magistrate Judge
14 Eastern District of California
15 Sacramento, California

16 APPROVED AS TO FORM BY:

17 /s/ Roger Yang

18 _____
19 ASSISTANT UNITED STATES ATTORNEY
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United States v. Bradley Earl Reger
Penalties for Criminal Complaint

Defendant

BRADLEY EARL REGER

COUNT 1: **BRADLEY EARL REGER**

VIOLATION: 18 U.S.C. § 2423(c) – Illicit Sexual Conduct in a Foreign Place

PENALTIES: A maximum of up to 30 years in prison; or
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count); \$5,000 under § 3014 (JVTA).

FILED
Jul 05, 2023
CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SEALED

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9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 United States of America,
12
13 Plaintiff,
14 v.
15 BRADLEY EARL REGER,
16 Defendant.

CASE NO. 2:23-mj-0099 DB

SEALING ORDER

UNDER SEAL

17
18 **SEALING ORDER**

19 Upon Application of the United States of America and good cause having been shown,
20 IT IS HEREBY ORDERED that the file in the above-captioned matter be, and is hereby ordered,
21 SEALED until further order of this Court.

22 Dated: July 5, 2023

23 Hon. Deborah Barnes
24 U.S. MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT

for the

Eastern District of California

United States of America

v.

BRADLEY EARL REGER

Defendant

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)

Case No. 2:23-mj-0099 DB

SEALED

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) BRADLEY EARL REGER,

who is accused of an offense or violation based on the following document filed with the court:

- Indictment Superseding Indictment Information Superseding Information Complaint
- Probation Violation Petition Supervised Release Violation Petition Violation Notice Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 2423(c) – Engaging in Illicit Sexual Conduct in Foreign Places

July 5, 2023

Date: _____



Issuing officer's signature

City and state: Sacramento, California

Deborah Barnes, United States Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

_____, United States Magistrate Judge

Printed name and title

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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 BRADLEY EARL REGER,
14 Defendant.

Case No. 2:23-mj-0099 DB
UNITED STATES' MOTION FOR DETENTION

15 **I. INTRODUCTION**

16 Defendant Bradley Earl Reger has been charged with Engaging in Illicit Sexual Conduct in
17 Foreign Places, in violation of 18 U.S.C. § 2423(c). As explained below and in the criminal complaint,
18 defendant has a long history of sexually abusing minor victims. The United States respectfully requests
19 that this Court order him detained pending trial. Because the defendant is facing significant time in
20 prison, has demonstrated a long-standing pattern and history of sexual offenses committed against
21 minors (both in the United States and abroad), has the means to live comfortably abroad, and has
22 traveled abroad extensively for many years, there are no conditions or combination of conditions that
23 will reasonably assure the appearance of the defendant or the safety of the community.

24 **II. LEGAL STANDARD**

25 Under 18 U.S.C. § 3142(e)(3)(E), there is a presumption that no condition or combination of
26 conditions will reasonably assure the safety of any other person and the community because defendant's
27 crime involves a minor victim under section 2423 of Title 18.
28

1 The rebuttable presumption in 3142(e) shifts to the defendant the burden of producing evidence
2 that the defendant is not a flight risk and not a danger to the community. *See United States v. Rueben,*
3 974 F.2d 580, 586 (5th Cir. 1992). Even if the defendant presents contrary evidence, the Court should
4 weigh the presumption in favor of pretrial detention as one of the factors to be considered along with
5 those set forth in 3142(g). *United States v. King,* 849 F.2d 485, 488 (11th Cir. 1988).

6 In determining whether there are conditions of release that will reasonably assure the defendant's
7 appearance and the safety of any other person and the community, the Court must take into account:

8 (1) the nature and circumstances of the offense charged, including whether the offense
9 is a crime of violence, a federal crime of terrorism, or involves a minor victim or a
controlled substance, firearm, explosive, or destructive device;

10 (2) the weight of the evidence against the person;

11 (3) the history and characteristics of the person, including the person's character,
12 physical and mental condition, family ties, employment, financial resources, length
of residence in the community, community ties, past conduct, history relating to
13 drug or alcohol abuse, criminal history and record concerning appearance at court
proceedings; and

14 (4) the nature and seriousness of the danger to any person or the community that would
15 be posed by the person's release.

16 18 U.S.C. § 3142(g).

17 Courts across the Circuit and country recognize the clear and present danger posed by defendants
18 similarly situated to the instant Defendant. *See United States v. Yoeun,* CR19-5148-BHS, Dkt. No. 11 at
19 6 (W.D. Wash. Mar. 13, 2019) (“Even with stringent conditions such as electronic home monitoring, it
20 would not be possible to control the defendant's access to the internet[.]”); *United States v. Santiago-*
21 *Muniz,* No. 3:17-CR-326, 2017 WL 6028347, at *3 (M.D. Pa. Dec. 5, 2017) (“Preventing th[e] type of
22 highly predatory and addictive sexual behavior which may be completed in relative secrecy with any
23 number of devices that can connect to the internet is simply beyond the capacity of pretrial services to
24 effectively monitor.”); *United States v. Petersen,* No. 17-CR-00259-CRB-1/JD, 2017 WL 2179591, at
25 *4 (N.D. Cal. May 17, 2017) (where defendant's “modus operandi was to induce trust and betray it” with
26 children he babysat, his “commitment to that tactic, and his success with it, raise insurmountable
27 concerns that he cannot be trusted to adhere to conditions restricting his behavior.”); *United States v.*
28 *Brugnoli-Baskin,* No. 2:22-mj-00499, 2022 WL 16636429 (W. D. Wa. Nov. 2, 2022) (detaining a

1 defendant before trial based on his abuse of a position of trust used to facilitate sexual exploitation of
2 minors).

3 **III. FACTS SUPPORTING DETENTION**

4 For more than a decade, the defendant sexually abused over a dozen teenage boys while in a
5 position of trust, as a licensed Nurse Practitioner, and as a leader of missionary trips associated with his
6 church. Using his status as a nurse practitioner and church leader, he groomed vulnerable victims with
7 jobs, gifts, money, and trips. He conducted countless sexually abusive physical “exams” of these boys
8 in his clinic in Susanville, in hotel rooms across the United States and in other countries, and even inside
9 of vehicles. He would entice his victims to travel with him to other states and other countries by
10 promising exciting trips involving religious service, outdoor adventure, and often paying for those trips.
11 Those trips provided defendant with the opportunity to repeatedly touch the naked genitals of his victims
12 for his own sexual pleasure. There are likely many more victims that will be confirmed following the
13 defendant’s arrest.

14 Different minor victims remember defendant penetrating their anuses with his fingers,
15 sometimes forcibly holding them down while he did so. Multiple victims stated that defendant required
16 them to ejaculate, claiming he needed to test their semen, and he would often touch their naked, erect
17 penises under the guise of a medical “exam.” These sexually abusive exams took place in the
18 defendant’s “clinic” in Susanville, California, in different states, and in foreign countries. Defendant
19 would use concerns about moles on skin, about hypothermia, about chlorine eye irritation, about
20 intestinal problems all as pretenses to conduct “exams” and touch minors’ naked genitals.

21 One minor victim had stomach problems that defendant claimed were the result of a hydrocele.
22 Defendant repeatedly used a device called a doppler ultrasound to stimulate blood flow to that victim’s
23 testicles and penis, Defendant would use that device on the victim approximately once per month and
24 before each trip. During the execution of the search warrant in the “clinic” inside defendant’s
25 commercial building on July 6, 2023, agents found the doppler device. Agents also located physical
26 exam forms with victims’ names on them, as some victims mentioned during their interviews. Agents
27 also located a rubber-type mold of testicles that some victims described the defendant using as he taught
28 them to do self-examinations of their genitals. Agents found close-in color photographs of moles on

1 skin, some of which had victims' names and dates on them. They also located forms containing body
2 diagrams where moles of concern were marked, matching victims' descriptions. Agents found sexual
3 lubricant (KY Jelly) next to the examination table, as many victims described in their interviews. They
4 located flyers for the "mission" trips that victims described the defendant organizing, and during which
5 the defendant sometimes sexually abused victims.

6 **IV. THE VICTIMS URGE DETENTION**

7 Under the Crime Victims' Rights Act, 18 U.S.C. § 3771(a)(4), a victim has a right to be
8 reasonably heard at any public proceeding involving release. The victims in this case strongly oppose
9 the release of the defendant. The undersigned prosecutor and case agents were able to speak with some
10 victims the day after defendant's arrest, and solicit their views on whether the defendant should be
11 detained or released.

12
13 Victim #1, after being contacted on July 7, 2023 and informed of defendant's arrest, wrote:
14 The victims of Brad Reger that I know personally number over 100. I know of dozens of others
15 that I've never met in person, and I have very good reason to believe that there are many more
16 than that all across the world that I know nothing about. These people are direct results of the
17 several decades of this man's crimes that have gone unpunished. They help to establish a pattern
18 of Brad Reger's consistent manipulation, exploitation, endangerment, and abuse of children.
19 Everywhere on the planet that he goes, he has connections and resources that he uses to commit
20 crimes. Every minute that he is not incarcerated is a minute that he can use to do whatever he
21 wants. Brad Reger has destroyed the lives many of the people that I'm closest to, and I've seen
22 what his damage has done to so many others besides myself. I've slept very uneasily for over a
23 decade knowing that Brad was out there free and able to do whatever he wanted to do, whenever
24 he wanted to do it. I'd like to know, for the first time in my entire existence, that the man who
25 ruined my life is finally in a place where he can't hurt anybody else, and finally try to get some
26 good sleep.

27 Victim #2 conveyed the following views over the phone: If the defendant were released, he
28 would find a way to continue to abuse children. I would feel a lot better if he were detained. I would be
concerned to see him in the community. Victim #2 is concerned that his family is in the same circles as
the defendant.

29 Victim #8, after being contacted on July 7, 2023 and informed of defendant's arrest, wrote:
Bradley Reger should be detained. Any other action would be brazen stupidity, and a dangerous
insult to every single victim and their families.

- He knows where my family lives, now he has the motive to hurt them.
- He has the motive to destroy evidence...and the means.
- He has the motive and resources to flee the country and escape justice...and he will do
it.

1 •He has documented abusive behavior, from mental manipulation and grooming, to
physical and sexual abuse...he WILL continue these if not detained.

2 •He has contact with many youth and young men through his social media accounts and
internet accessible devices...he will contact them...he will threaten them.

3 Brad told me once that if someone ever broke into his house he would “shoot them in the
4 head, then shoot the wall behind them in order to make it look like he feared for his life.” This
is not a safe man, this man is evil...and has committed horrible sexual crimes all over the world
5 and dragged his victims along with him. What answer will you, judge, give to the families of his
next victim if he is not detained?

6 There is not a day and often not even an hour that goes by, where I do not think about the
abuse I went through...the humiliation, the fear...the coldness of his soul or the sound of his
7 voice...the feeling of his skin on mine, and the sound of his breath. It haunts me. He should not
be allowed to walk out of this courtroom and terrorize the community. He must be detained for
8 the safety of all. Any other action would be inexcusable, and itself evil. Do not let this man walk out
of this courtroom.

9
10 **V. ARGUMENT**

11 **A. 18 U.S.C. § 3142(g)(1) - The Nature and Circumstances of the Offense Support**
12 **Detention**

13 The criminal complaint in this case charges defendant with a serious child exploitation offense:
14 engaging in illicit sexual conduct in foreign places. That crime carries a statutory maximum term of
15 imprisonment of thirty years. Defendant’s conduct was aggravated. The minor victim for the count in
16 the criminal complaint was only 12 years old when the defendant isolated him and sexually abused him
17 in a hotel room in the Philippines, during a “medical mission” trip. Defendant continued that pattern of
18 abuse of Minor Victim #3 many times, asking him to get an erection and handling the victim’s erect
19 penis with his hand, claiming he was inspecting for moles.

20 But Minor Victim #3 was not alone as the victim of defendant’s sexual abuse under the guise of
21 supposed medical care. As set forth in the criminal complaint, defendant sexually abused more than a
22 dozen male patients between the ages of twelve and twenty-two under the guise of conducting purported
23 medical examinations at his medical clinic in Susanville, CA, and in hotel rooms and camp sites all over
24 the world. Investigators learned that allegations of defendant sexually abusing minors had been
25 investigated by local law enforcement dating back to 2003, 2006 and 2007. Defendant’s position as a
26 nurse practitioner, as an organizer of church mission trips, and as a business owner provided him access
27 to teenagers and the opportunity to sexually abuse them. The community that defendant lives in is a
28

1 small one, in rural northeast California, and if he is released, there is a high probability that he and some
2 of his victims (or their family members) will cross paths.

3 Defendant's crimes had a seriously negative and lasting impact on some of his victims. One of
4 the victims (not Minor Victim #3) wrote an online public letter titled: "A Long Personal Letter to the
5 Man Who Sexually Abused Me as a Child." Exhibit 1. That letter sets out the devastating and long-
6 lasting emotional consequences that the victim has suffered as a result of defendant's crimes against him,
7 and the guilt he feels for not being able to stop the defendant from abusing other minor children.
8 Another minor victim guessed which victim had written the open letter and said that "those experiences
9 [of the author of the letter] are pretty much on point with what I experienced..." The serious nature and
10 circumstances of defendant's criminal conduct warrants detention.

11 **B. 18 U.S.C. § 3142(g)(2) - The Weight of the Evidence Supports Detention**

12 The evidence against defendant is very strong. So far, the investigation (which includes
13 information gathered by a third-party investigation organization prior to the joint federal law
14 enforcement investigation) has identified more than a dozen victims of defendant's sexual abuse, dating
15 back many years. These victims, who have been separately interviewed, tell similar stories of defendant
16 isolating them, choosing some of them for special treatment, groping their genitals, and giving them
17 invasive and long hugs after conducting sexually abusive "exams." The victims' accounts are
18 consistent, specific, and corroborated by other evidence, such as travel records, electronic
19 communications, bank records, mission trip photographs, items found at defendant's "clinic" during a
20 search warrant execution, as well as the accounts of other victims. Although not the most important
21 detention factor, the strength of the evidence in this case favors detention.

22 **C. 18 U.S.C. § 3142(g)(3) - History and Characteristics of Defendant**

23 Defendant's history of conduct demonstrates very clearly for the Court that he poses a
24 substantial, real danger to the community. Before his arrest, he repeatedly sought out positions of trust
25 and authority with children, and Defendant abused those positions with at least one child to sexually
26 exploit him. That demonstrated and realized sexualized interest in minor will continue to exist as long as
27 Defendant is released into the community. The crimes charged are not only crime of violence but also
28 crimes against minor victims, which is a particularly vulnerable group unable to defend themselves. That

1 Defendant chose this particular subset of victim to prey upon only heightens the danger that Defendant
2 poses to the community. And because the charged offenses “entail the sexual exploitation of children,”
3 they are among “the gravest and most serious crimes that a defendant can be charged with.” *United*
4 *States v. Petersen*, No. 17-CR-00259-CRB-1/JD, 2017 WL 2179591, at *4 (N.D. Cal. May 17, 2017).

5 Defendant's history and characteristics further support detention. In terms of past conduct, for
6 over a decade, he has perpetrated repeated sexual abuse of minors, in the guise of medical “exams.” He
7 used his position of authority as a respected church member, as the leader of church-affiliated mission
8 trips, as a successful business owner, and as a nurse practitioner to groom children and continually grope
9 their naked genitals for his own sexual pleasure.

10 Further, defendant has an extensive history of domestic and international travel, and presents a
11 serious risk of flight and non-appearance at future court hearings. He has the financial means and travel
12 history and international connections to disappear to another country, and the likelihood of a lengthy
13 prison sentence to deter him from appearing in court. Exhibit 2 summarizes defendant’s astonishing 235
14 international travels between 2004 and 2023. As recently as June of 2023, the defendant traveled to
15 Ireland and the United Kingdom for over two weeks, and he was arrested on July 6, 2023 after returning
16 from a trip to Colorado. Defendant’s foreign travel history includes destinations such as Dominica,
17 Ukraine, Poland, Spain, Ireland, U.K., Philippines, South Korea, Czech Republic, Japan, Qatar, Iceland,
18 Israel, France, Germany, UAE, Jordan, the Netherlands, Ghana, Hong Kong, Finland, Senegal, Mexico,
19 Haiti, China, Canada, Hungary, Singapore, Trinidad and Tobago, Belize, and Kenya. HSI and FBI have
20 conducted several interviews of victims in which they describe abuse occurring overseas in countries
21 such as Poland, Ukraine, and the Philippines. During the search of defendant’s commercial property,
22 agents found a file drawer filled with photocopies of passports of young men, many of whom are victims
23 in this case, as well as travel and immigration documents.

24 Even if the Court were to order defendant to surrender his passport to Pretrial Services and be
25 electronically monitored, other defendants in this district have managed to flee the country while on
26 pretrial release under similar conditions. *See United States v. Ruslan Kirilyuk* (14-083-GEB) (fled to
27 Mexico the week of trial, and codefendant Maslov also fled while on pretrial release but stayed in the
28 US); *United States v. Constantine Pappadopoulos* (fled to Greece in 1993 while awaiting a verdict in an

1 arson case, despite surrendering his passport to the court, called from Greece to say he would not be
2 coming back, and is still a fugitive: [https://www.latimes.com/archives/la-xpm-1993-07-05-mn-10259-
4 story.html](https://www.latimes.com/archives/la-xpm-1993-07-05-mn-10259-
3 story.html)); *United States v. Yaniv and Orel Gohar* (2:17-cr-232 GEB) (co-defendant brothers who fled
5 to Israel while on pretrial release and had to be extradited back to this country:
6 [https://www.justice.gov/usao-edca/pr/extradited-israeli-fugitive-sentenced-illegal-gambling-business-
8 money-laundering-and](https://www.justice.gov/usao-edca/pr/extradited-israeli-fugitive-sentenced-illegal-gambling-business-
7 money-laundering-and)); and *United States v. Erasmo Solorzano* (21-cr-109 DAD) (defendant asked to
9 access his passport in order to renew his driver license and fled the country on pretrial release).

10 Defendant has substantial financial assets that could facilitate his flight from this court (his credit
11 card statements from the time he was abusing minor victims sometimes revealed tens of thousands of
12 dollars of transactions in a single month, and certain victims were trusted to carry thousands of dollars in
13 United States currency during international trips - for the defendant). While defendant has a lengthy
14 history of residence in northern California, and family and property ties to this district, the government
15 believes that those ties are more than offset by his lengthy history of sexual abuse crimes against minors,
16 and ability to abscond from pretrial supervision and perhaps never be brought to justice. Overall,
17 defendant's history and characteristics, as a long-term child sexual abuser, warrant detention.

18 **D. 18 U.S.C. § 3142(g)(4) – Danger Posed by Defendant's Release**

19 If released, defendant could pose a significant risk of danger to his prior victims, and future
20 victims, and those victims the government has not yet identified. It bears repeating that defendant
21 sexually abused many different victims over many years, and he never seemed to run out of teenage
22 boys whose genitals he could fondle under the guise of medical "exams." Two of the victims told
23 interviewers that, years after they were abused and shortly before their weddings, defendant met with
24 them and counseled them on how to sexually please their wives. For one of those victims, shortly before
25 he got married, defendant gave him an "exam" as he had in the past. On the night before his arrest,
26 while at the Reno airport, the defendant was attempting to engage a young girl (whom he did not appear
27 to know) in a conversation. Information from Facebook indicates that in June of 2023, defendant was
28 exchanging messages with someone associated with an orphanage in Kenya, where he had previously
traveled.

Defendant has multiple firearms registered to him according to firearms registry records

1 accessible to law enforcement. One firearm was seized by local law enforcement at his residence during
2 the search warrant execution last night, for safekeeping. The registry records also indicate that his adult
3 son, who lives in the area, and his brother, who is a nearby neighbor, also (lawfully) own firearms.
4 Given the statement that defendant made to Victim # 8 about how he would shoot a burglar in the head,
5 then shoot the wall behind the burglar to make it look like he feared for his life, the accessibility of
6 firearms if released is a serious concern to the safety of others.

7 No special conditions this Court can impose would sufficiently mitigate the danger that
8 Defendant poses due to potential community access to minors and to electronic devices capable of
9 further communicating with, and exploiting or sexualizing, minors. Location monitoring subject to
10 global positioning technology cannot enable Pretrial Services to determine his proximity to minors.
11 Further, if released, defendant would be living in a small community and may seek to leave for any
12 number of reasons, including appointments and legal reasons, which may put him in further close
13 proximity to minors and some of his victims. Although conditions could aim to bar Defendant from
14 possessing computers or accessing the Internet, as this district has experienced recently, Pretrial
15 Services, despite their best efforts, has limited ability to ensure full compliance with that condition,
16 especially given technology-savvy offenders like the one in this case. As the Ninth Circuit discussed in
17 *United States v. Hir*, 517 F.3d at 1092–93, it is extremely difficult to control a defendant's access to
18 computers or the internet: internet-capable devices are ubiquitous in our society. Finally, the Court may
19 impose a search condition, but this would likely still require Pretrial Services to develop reasonable
20 suspicion of contraband or evidence of a violation of a condition of supervision.

21 Defendant has shown that he is adept at selecting victims, grooming them for his abuse, and
22 repeatedly groping their genitals for his sexual pleasure. He poses an ongoing risk of danger to the
23 public if released from custody.

24 VI. CONCLUSION

25 Defendant remains a danger to other persons and the community, and cannot overcome the
26 presumption of detention in this case. The primary victims in the case strongly oppose his release, and
27 express serious concerns about what could happen if he were to be released. Considering the nature and
28 circumstances of the instant offense, the weight of the evidence against Defendant, Defendant's

1 characteristics, and his danger to the community, there are no conditions of release that will reasonably
2 assure the safety of any person and the community. He should be detained pending trial.

3
4 Dated: July 7, 2023

PHILLIP A. TALBERT
United States Attorney

5 By: /s/ Christina McCall
6 CHRISTINA McCALL
Assistant United States Attorney

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EXHIBIT 1



[Updated Apr 15](#)

[A Long Personal Letter To The Man Who Sexually Abused Me As A Child](#)

(Originally posted under a pseudonym)

To Bradley Earl Reger,



How have you been lately? It's been a while since we've spoken or seen each other. It was at your son's wedding ceremony if I remember correctly. Do you still spend an inordinate amount of time alone with children? I'm certain that you do because you're a horrid piece of shit who does not change his ways.

You are a disgusting and vile man. Everything about you is abhorrent and makes me sick. When I think of monsters, I see your face. When I have nightmares, you are the boogie man that I cannot ever get away from. Your loathsome face haunts my waking moments. You are the piece of my past that I will never be able to escape; no matter how much liquor I drown myself in in my feeble attempts to erase you. You are

human garbage, but unfortunately society will not dispose of you. You continue to be allowed to walk around with rest of us, free to prey on the weak and innocent.

I wonder, do you dream about me too? Does your decrepit tiny cock fill with blood as you imagine my prepubescent dick enveloped in your massive sausage fingers? Do you yearn wistfully for the days you could force me to sleep in a bed with you, while you wore nothing but your underwear? Does it thrill you to reminisce about a nervous young boy naked in a hotel room, yours for the taking? Do you ever jerk off to the mental spank bank that you built up of almost a decade of molesting me?

I wonder which version of me that you liked better? An eleven year old me with the body of a small child, or a sixteen year old me with a bit more cock for you to hold on to? I would guess the former, seeing as how when a boy reaches 18 you begin to shuffle him out of your life, his emotional and physical use being over to you. The older they get, the less it becomes child abuse and the more it becomes a gay sex act. You might be able to sleep easily at night being a pedophile, but god forbid that you were a faggot right?

Sometimes I think about just how many lives you must have ruined. How many young boys you've permanently damaged with your selfish acts of sexual self-gratification. It has to be at least 100 right? I wonder how many had it even worse than I did?

I've spoken to other victims of yours about the disgusting things that you did to them. Their stories seem to be pretty similar to mine for the most part. You, obese and towering over a terrified child a third of your size, your sweaty palms eagerly grasping a small set of hairless testicles in tent, or a cabin, or a private room, never taking no for an answer. Maybe ramming one or two of your fat fucking fingers up an asshole occasionally. All pretty par for the course for a getaway with Bradley. But who are the others I haven't talked to? Who were the ones that may have had it worse than me? To your credit, I never had to put your shriveled little dick in my mouth, or feel it slide up into my anal cavity, no matter how much you may have wanted that to happen. But was there anybody else who did? Did you ever take you your predatorial proclivities to the next level you disgusting fucking pervert?

Do you ever congratulate yourself for how long you've been able to get away with it? Because I have to admit, I'm a bit impressed. You're not exactly subtle about your enjoyment of spending time with children. Your cover is pretty clever though. Hiding behind the auspices of a man of both medicine and god. Living in a small town where the narrow minded conservative residents would rather turn a blind eye because of the utter indecency of it all. Treating victims in your "clinic" behind closed doors to engage in an all you can grope buffet. Travelling across the globe in a state of pederastic euphoria, using charity as the positive public image to cover up your shameful private actions.

I wonder how young you were when you thought it up? I wonder what other career paths you may have considered as an alternative before settling on this one as the optimal way to get away with your crimes? When was the first time you acted on your shameful fantasies and felt the excitement and sexual arousal that comes from gripping a scared little boys limp dick between your grimy digits? When was the last time that you committed this crime? Yesterday? The day before? Last week? Surely it has been no longer than a month. I doubt you could go that long. Maybe you have a molestation penciled in for later today. Maybe you have some small Ukrainian boy living in your house right now that you have free access to fondle every time he complains of a tummy ache. Jesus, that's really when you hit the jackpot isn't it you fat fuck? That day you thought up the clever little idea of importing your victims from overseas and then sending them back once you've had your fill. Disposing of them in favor of some new underage piece of ass that you can get your jollies off with. It's less messy that way I'm sure. Much less of chance of the

rumors spreading. Much less chance of any litigation. Much less chance of people caring. Much less chance of getting caught.

How the fuck have you not died yet? I had thought, or rather had hoped, that your morbid obesity would have led to a life ending heart attack or stroke by this point. But no matter how disgusting or unhealthy your lifestyle is, your fat-clogged arteries continue to pump blood to and from your black heart. The world is all the worse for it.

A few months ago somebody told me that they saw you in a store. They said you looked awful and sickly, that you were in a wheelchair and hooked up to an oxygen tank or some type of medical machine or some shit. Not being able to contain myself, I burst out laughing and immediately said, "I hope he has cancer". The other people in the room seemed fairly uncomfortable with my absolute giddiness at the thought of you suffering, but I could not give a fuck less. It was a while before I was able to wipe the shit-eating grin off of my face. The thought of you dying a slow and painful death actually brought a small sliver of happiness to my miserable fucking life. The thought of your blubber-ridden corpse buried beneath the dirt being skull-fucked by maggots almost literally brought tears of joy to my eyes. Because, you know, I really fucking hate you.

See, I am not a happy person. I am patently the polar opposite of that. I actually don't remember how many years it has been since I felt genuine joy without the aid of a massive amount of some sort of chemical substance being shoveled into my body. The often debilitating depression that I live with, which you are largely responsible for, prevents me from feeling anything but vast and neverending sense of emptiness. The gallons of booze eradicating my liver, the smoke that fills up my lungs, the powder that I suck into my nose, the pills that I choke down my throat, these things can bring about a small semblance of joy every once in a while. But it is fleeting and artificial, and even fucked up out of my mind I am aware of that fact. The only form of joy I have managed to work up without reliance on my crippling substance abuse in at least half a decade ironically came from you. The thought of you experiencing real physical suffering is what it took to wrestle out of me the feeling of mirth and elation that has been absent in my life for so long. Imagine my absolute and total disappointment when it turned out your death wasn't as eminently close as I could have hoped. Life's a bitch ain't it?

Maybe you could help a guy out though. I mean, you fucked up my life quite a bit. The least that you could do is catch a spot of cancer to raise my spirits a little again. Maybe you take a page from that hideous dead wife of yours and start sucking down cigarettes like they were pure oxygen. It might be hard for you to pick up a habit like that at your advanced age, but it might make it easier if you pretend each one is the supple little cock of ten year old that you can slobber on. I bet that could help you power through the initial unpleasantness of forming a new addiction.

Speaking of that dead cunt you used to be married to, I have a fun fucking story for you. On the night of her funeral, [REDACTED] really drunk, and I mean shit-housed. In her emotional state, she began to start asking questions that she had had for years, but had rightfully been too afraid to ask. See, being a [REDACTED] she knew how delicate this subject was to broach. After timidly dancing around the question she wanted to ask for a good while, it finally burst out of her, [REDACTED] "ever molest you?" She didn't really have to ask, she already knew the answer. She had known the answer to this question for a very long time. She just needed to hear the words out loud, from someone who had suffered from your terror first hand. As I confirmed her deeply held fears, I tried to handle the situation with some semblance of delicateness. Not to protect her piece of [REDACTED] or her feelings about him, but because [REDACTED] It was a difficult night for her. She was having none of my pussy-footing around though. Her questions at one point became much more blunt as

she became much more horrified and drunk. [REDACTED] ever put his penis in your mouth?" [REDACTED] ever fuck you?" At this point she was no longer crying [REDACTED] She was crying because of the horror and disgust she felt towards the heinous [REDACTED] ad habitually committed throughout his life.

Do you want to know the most fucked up part about this incredibly strange ordeal Brad? She did not believe me when I honestly answered these more pressing questions. She was so thoroughly convinced of your many monstrosities, that she did not accept that your diminutive penis had never entered my mouth or asshole. She honestly thought that I was just trying to protect her feelings at first. Then she became convinced that I was just repressing memories of it. This repetitive line of questioning continued well into the night. And honestly, I'm not sure that I ever really convinced her that you had never mouth-raped or sodomized me. Just go ahead and sit on that thought for a moment fuckhead [REDACTED] [REDACTED] after having her suspicions about her pedophile father confirmed, could not accept that you were not an even worse piece of shit than you actually are. She was so thoroughly convinced of your heinousness, that after hearing the honest truth straight from the victim's mouth, she could still not help but think that you were an even bigger cocksucker than I had confirmed to her that you were. Although I couldn't speak for all of the countless other children that had suffered at your touch. She was absolutely mortified and even apologized [REDACTED] I guess she got over it quick enough though. Eventually just silently falling in step with the horde of complicit sycophants that willingly turn a blind eye to your crimes. Luckily you have enough money to buy just about anyone's love and keep their fucking mouths shut.

And since the previous couple of paragraphs are detailing the events of the night of Sherri's funeral, I just wanted to speak on her a moment more before moving on. That was a night that also brought me a fair bit joy. The death of that intolerable cow did bring me a copious amount of laughter. She was absolutely horrid to be around, and also contributed a fair amount of misery to my childhood. I'm sure she knew exactly what you were up to and clearly had no problem that you spent more time with little boys than with her in the last few years of her life. I truly did despise that miserable woman, as did the majority of people who came into contact with her. I'm sure that the knowledge of the pedophilia her husband was partaking in made her mental situation much worse, and made it hard to live under the same roof. But no matter how much you directly contributed to her declining health, I still don't forgive that horrid witch for her complacency in your crimes. She was after all the one who benefited the most from you purchasing her silence. This diversion to trash-talk your deceased spouse has not been included simply for spite. I'm just trying to be as honest as possible in this long-winded diatribe. The sadist you helped meld me into feels that this was pertinent information for you to know.

What made you into a pedophile I wonder? Was it just in your genes? Was it just an unfortunate chemical imbalance in your brain that also infects so many other people? Were you also molested at a young age? I've long suspected that the latter is true, even though if it were true it would help to humanize you ever so slightly. Was it somebody who was close to you? A teacher? A preacher? A doctor? An uncle? Your father, the brigadier general? I've always thought that there was some sort of abuse from him towards you. Perhaps not though. Perhaps nobody raped you as a youngster. Maybe you just discovered the pleasures of fondling little boy scrotums of your own volition.

Did you ever do it to your own kids I wonder? You ever get a good handful of Jonathan junk to whet your disgusting appetite Brad? A little filial fondling when no one else was around? What about the next generation, the grandkids? At this point your grandson is probably the same age that I was when you began to greedily grope my cock and balls at every opportunity that you got. You ever get tempted by him Brad? A little grandson grabbing to get your dusty old rocks off? Not as far as I can tell. You've

probably thought about it though. Actually going through with it may be a bridge too far even for you. Incestual child abuse may run in your dead wife's side of the family, but at this point I have no evidence that it runs in yours.

I know that you do not for a second regret anything that you've done. In fact, you are so proficient at lying to yourself that I doubt you've ever seriously assessed your actions as being immoral in any way. The self-serving mental gymnastics that you excel at rarely, if ever, allow you to even consider anything that you've ever done as being wrong. After all, you've got life all figured out. You've discovered the absolute perfect way a life should be lived and will hear no words to the contrary. The way that things work in your world are exactly as they should be, and fuck anybody else who thinks differently than you. You fat, arrogant, cocksucker. The way that you look down on and disdain other humans with your self-righteous air of superiority makes me nauseous. The way that you can cockily carry yourself around with your head held high astounds me. Even as a child the way that you treated other people absolutely infuriated me. In your eyes, everyone is lesser than you. Less intelligent, less funny, less clever, less successful, less right, and absolutely living their lives incorrectly.

I used to tell people who asked me about you that you were not a human being, that you were not somebody who lived in the same world as the rest of us. It is not enough that the person that you have formed yourself into, and the worldview that you have built for yourself, are so incredibly different from that of any other person; but even more maddeningly you have become incapable of conceptualizing another worldview or way of existing. And because of this you condescend to and scoff at every other person's worldview or way of existing. An honestly, how could the rest of us be so stupid so as to not see things exactly the way that you do Brad? How is it that us pions that live amongst you happen to be so goddamn ignorant even after we have seen the light of your wisdom? You magnanimous and infallible piece of perfection you. How horrible must your life be to spend it trapped with the inferiority of all of us other ignorant dumbasses? Christ almighty your life must truly be a fucking mental chore.

Oh and speaking of Christ, that's another fun topic that I feel like must be addressed when dealing with the subject of what an utter fucking cunt you are. How somebody as intelligent as you can believe in a myth as real as Zeus, Santa Claus, the Loch Ness Monster, young Earth, or trickle-down economics, completely astounds me. The fact that you cling to this particular bit of ignorance is a very interesting thing to me. What the fuck would you be without that stupid fucking god that you cherish so vehemently? I mean, by the time that I was five I was able to almost completely eradicate belief in a god. What the shit happened to you? How the hell are you still able to believe in an omnipotent sky-deity? It's because you need it. You are nothing without it. It forms the crux of your public identity. It helps to form a shield between your despicable private actions and the public perception of you.

If a 350+ pound, bearded old man in a white van with tinted windows, who bought candy and junk food for a posse of little boys was anything but a Christian, people would become suspicious. But hidden behind the auspices of a faith in the Protestant god, that same man gets to fondle his merry old way into an eternity in paradise with not much more than a raised eyebrow. Without god as your scapegoat, you would probably only get the succulent, underage dick that you crave in your "clinic". But with god on your side, anything is possible; including neverending fun-filled, unsupervised, international, child grope-fests. It would be a helluva lot harder to prance around in nothing but your skin tight white underwear in a cabin full of 12 year olds if you were simply a medical practitioner. But as a righteous man directing children towards the path of the lord, you have a level of plausible deniability. If you just stripped down in a medical environment, it would be much harder for you to get away with. But because of a collective faith in a 5,000 year old man-made myth, you have a support structure around you that allows you to find yourself in all sorts of sensual scenarios with young boys. You are after all, an elder in the church, and

when has somebody in that position ever abused the power that they have over the children of the congregation?

Without your fake god, you may have never gotten the chance to flop out your miniscule member in a public shower filled with naked little boys. That's not something a man of medicine gets a whole lot of chances to do. But a man of god? He gets to call it a necessity of a youth group road trip. Looking back at all the times you forced your gross little dick into mine and many others fields of vision, I only have one question. How'd you manage to never pop a boner? Was it a simple matter of impotence? Or was it a case of remarkable self-control? I mean, for you, that's the kind of stuff that erections are made of. You fully nude, wet, steam filling up the tiled room, a dozen or more boys under the age of 16 who are also naked, lathering themselves up with soap, making jokes and giggling about the act of being naked in a public place..... How you managed to not spontaneously ejaculate on the the spot actually impresses me quite a bit. It must have been quite hard for you.

Without your false messiah, it would have been hard for you to justify shaming young teenagers about the immorality of their masturbation and porn habits. It would have been hard to justify your deeply and highly inappropriate, as well as personally invasive, conversations with children about their sexuality, and the restrictions you wanted to shame them into in order to keep them pure for you. Medical practitioners have a hard time getting away with things like that. Accosting them in the middle of the day in a public setting and asking if they have masturbated recently is something only a religious counselor can get away with. It's not creepy as long as you can sin-shame a child right Brad? You disgusting old fuck. If you were just a medicine man, you might even feel some guilt about your highly inappropriate sexual conversations with children. But as a man of god, you get to spill your guts in an act of confession to an entity that only exists within the constructs of your own mind, and that guy can absolve you of any of your disgusting behaviors. It must be real fucking convenient to have a friend in Jesus.

Let's move on from your belief in fairytales. I hate myself. Believe it or not, I hate myself more than I even hate you. And that is kinda impressive. Because I really, really fucking hate you. That's not entirely your fault. I don't want to put ALL the blame on you. But to be sure, you are a major fucking contributor. A lot of my self-hate comes from my inability to do anything to prevent you from hurting more children. I have done literally nothing to stop you. Because I'm a pussy. Because I'm so dissociated with existence that I have not actually cared enough to stop your reign of terror. Because I, much like the entirety of your family, have become complicit in your crimes through my knowledge and inaction.

I care so little for my own self that I consider the things that I have suffered at your hands to not matter in the grand scheme of things, especially in comparison to people who have suffered much worse fates than I. This is an unhealthy way of thinking and I am aware of that. Fortunately, I don't care about me, so I continue to destroy myself mentally, emotionally, and physically. I knew what you did to me was wrong. I knew you had to be doing it to other people, to greatly varying degrees. I hated every second of it. It scared me. It confused me. Until it didn't. Until I figured out how to harness the power of your sexual attraction to children for my own benefit. That was at a young age. I distinctly remember the turning point when I realized I could manipulate you as much, if not more than, you manipulated me. Your weakness for adolescent boys became my advantageous position. I used you to get what I wanted. I manipulated you and lied to you in ways that you will never be able to comprehend. In ways that I'm disgusted that a young me even had the capacity to do. You were such an easy fucking target. Sexual and emotional attraction makes people weak and vulnerable. I learned that from watching you. I learned to be a completely depraved piece of shit through your attentive tutelage. I observed your behavioral patterns and emotional weaknesses and played them against your disturbing feelings for me like an intricate chess match. You knew I was intuitive, but you also overestimated your shitty poker face. You are a weak man,

and you show it often. I learned how to cheat, how to steal, how to lie, how to manipulate other people, all through methodical experimentation on you. I had those traits before I met you to be sure, I was a piece of shit before you came into my life. Your stupid god fucked me up mentally well before you barged into my life. But through you I was able to forge these passing proclivities into tempered personality traits that have dominated my life's trajectory for over a decade and a half. Your childlike emotional weaknesses and incapability to acknowledge your own faults proved to be fertile training grounds for an up and coming sociopathic nihilist. That's probably the most important thing that I learned from you. Self-deception. What a fantastic tool that has become in my hands. It may be the only thing that up to this point has prevented me from opening my own throat with a blunt instrument.

I hate myself for hiding your crimes. For allowing them to persist. For lying about them. I'm still haunted by the multiple times that a group of my peers asked me point blank, "Is Brad a child molester?" I see it in my mind often. A group of teenagers, recently done with a pickup match of soccer or some fuck, talking shit about you. It was a favorite conversation topic for those of us that ran naked in your circles. Multiple times our shit-talking sessions would lead to jokes about pedophilia. Then inevitably, the moment would come when somebody would ask me that question. And I would always take a breath, and lie straight to their timid looking little faces. I'm still haunted by the eerie silence that would befall the group each and every time that this subject was broached, as they nervously awaited my seemingly authoritative answer. See everybody knew that out of the people in our general age range, I was by far and away the closest to you, in every way. And on top of that I was often asked about deep matters in general because I thought about these things more than any of them. I'm still haunted by all of the times that I lied to them to make them feel better. Even as the images of me with hypothermia being molested in a tent, and images of me with chlorine poisoning in my eyes being molested in a Marriott hotel bathroom flashed before my eyes, I lied. They couldn't handle it the way that I could. A few were older than me but most were younger. They didn't need to carry this burden.

I'm still haunted by the slightly uneasy sighs of relief that would be collectively let out as they accepted my lies at face value. For basically every single one of them, the extent of your sex crimes was an annual or biannual scrotal exam while lying on a white sheet in your "clinic". Awkward and uncomfortable to be sure, but only made slightly more out of the ordinary because the other doctors they had received physicals from didn't also give them a hug afterwards while saying "I love you". But still easy enough to be accepted as eccentric behavior from a man who cared way too much. They didn't have my ala carte molestation experiences that could happen anywhere and anytime, with stupefying frequency. Hearing the confidently authoritative lies drip seamlessly out of my mouth was all that they needed to bring a measure of peace to their troubled consciences. That is, until the next time we would inevitably be making jokes about "Uncle Brad Touch", or in any other way be mocking your proclivities for touching our collective genitals. And then the conversation would play out the same way, and I would again reassure them that the physicals that they were receiving were not from a sexual pervert, but instead from an emotionally complicated man who was too attached to his childhood.

I hate myself for how easy I made it for you. I mean, my pre-existing medical conditions made me your idyllic target to begin with. But I didn't need to make it that fucking easy for you. You see, very early on I figured out that when I didn't feel good, and I let you know about it, you'd molest me. And then I figured out that every time you molested me, you felt much closer to me. And then I figured out that the closer you felt to me, the more I could get out of you. So I began faking and overexaggerating my medical ailments. As a result, you started sexually groping me with increasing frequency, and I received more of the things out of you that I wanted. I mean, I hated every second of your grubby fingers molesting my genitals, but I understood the trade-offs and the ways that I could personally benefit from your physical attraction to my undeveloped body. I knew that each time you greedily feasted your gaze on my naked

form and were satiated by the touch of my sex organs, we were brought that much closer together. It's a fucked up head space for a twelve year old to inhabit, but such are the realities of my life.

I hate myself because I've been acutely aware that you not only provide medical physicals for every under-18 year old boy that you can get your fat fucking hands on, but before and after me, their have been those that have gotten the level of special treatment that I received from you. I can only guess the ones that came before, I'm almost positive I know for a fact which ones they are, but I have gotten actual confirmation from the ones who came after. I have actually had conversations with the victims of your crimes that came after I stopped being your favorite sex doll. I knew who they were before they confirmed it to me, because I'm not a complete fucking idiot, and you are so goddamn predictable. I did nothing. I have done nothing. I knew that they were the ones being molested by you just by simple process of elimination and intimate knowledge of how your fucked up mind operates. But I did and have done absolutely goddamn fucking nothing to end your reign of terror. Even as I began to know these individuals more I still did nothing to address the fact that you were sexually exploiting them in the same exact fucking way you exploited me. I did fucking nothing. I relegated them to the same fate as me. The way that the ones who came before me let me be taken advantage of, I let them be taken advantage of. Through my inaction I have been complicit in the psychological and emotional damage that you continue to inflict on others. For that, I will always loathe myself on a core level. I'm not just being hard on myself. I am to this day letting you get away with this shit. I continue to do nothing.....

I sought out some of these others. I needed to confirm what I already knew. I needed to put verified checkmarks next to the names of the victims that I knew you had exploited. I needed to hear that I was right, [REDACTED] when she accosted me about your crimes. I needed to refuse myself the possible plausible deniability of maybe being wrong. Of course I fucking wasn't. You are so goddamned predictable. I know your fucking type. I know the vulnerabilities that you love to exploit. You never fucking change. I needed their stories and scars to be compiled with my own. Unlike you I don't have the luxury of just praying away the truth. And apparently drinking it away doesn't fucking work either. Unlike you I needed to face my own mistakes full on and take emotional responsibility for the lives that I have helped to ruin. I faced my mistakes. I hate myself much more for it. But I fucking did it Brad, you fuckmouthed coward.

So now on top of my own personal trauma, I have the added comfort of never being able to forget theirs. When I reflect on my life and get to see my own scared little faced being enveloped in your monstrous fucking shadow, I now also get to picture theirs. Their sullen and nervous faces, recounting the same abuse and trauma that I was a victim to, by the same piece of shit perpetrator. I continued, and still continue, to do absolutely fucking nothing.

I don't know why I chose this day of all days, or this year of all years, to accost you for your vile fucking behavior. I've fantasized about this for a very long goddamn time now. There is nothing special about today. I woke up, ate breakfast, cracked open my first beer, and began to write. No anger, no sadness, no vitriol, no real emotion at all, no special reason for it. Just an idea that randomly popped into my head. In no way premeditated. Just a complete stream of consciousness. I mean, you haunt my waking moments daily, but I have no special reason to write this today. Just a spark of an idea, and a man unattached from his real emotions surgically extracting talking points from his fucked up head. I have felt nothing during the writing of this. I have taken breaks to carry out various pressing errands in the middle of it, but have been able to jump right back in once those tasks were completed. Just my usual emotional emptiness. Just a task as easy to carry out as answering my emails or doing my banking. I actually thought that the composition of this overlong letter would drive me towards some sort of real emotion, like anger, or sadness, or vindication. I was wrong. I don't know what the fuck I expect to get out of this. I'm sure that I

will never have confirmation that you have even received, let alone read this. And you surely are too much of a coward to ever respond. Even if you did, I am unsure that it would do anything for me. The damage is already done. I'm basically just staving off boredom at this point. I may never even fucking send this to you.

I hate you more than I could possibly hate any other human on this earth, with the exception of myself of course. I hate you more than you have ever loved anything. But at this point, those words are just pure facts, not actual emotions or feelings. Fundamentally this changes absolutely goddamn nothing in my life. And it changes nothing in yours. I mean, you'll cry when and if you read this, you are a weak and pathetic man. But otherwise, nothing changes. You'll just continue to throw money at your problems and jerk off to memories of the days that Ronald Reagan was president. You'll keep reading your stupid fucking Bible, and groping children, and evading taxes, and loving yourself, and in general getting to keep living out the last of your days with no repercussions for your actions.

I guess you won at life you sick depraved child fucker. I'll continue to hate my own existence almost every second that I am alive. I'll continue to drink myself to death. I'll continue to periodically put a gun to my head or a knife to my throat, screaming at myself to have the balls to stop being a weak human being and just fucking end it all. I'll still continue to have nightmares and flashbacks of being enveloped in your fat, heavily persperated embrace, as you desperately try to convince me that you love me after an hour long session of you accosting me for having the normal sexual urges of a teenager. You'll continue to be a child molesting, self-centered, glutton. I'll continue to be a broken shell of a once happy child. Such is life I guess.

Sometimes I wish that the stupid omniscient cunt in the sky that you worship was real. Because that would make hell real, and then you'd end up there. I mean so would I, but more importantly you would be there. But on the other hand, once you do the world a goddamned favor and cease to be a fat fucking waste of our collective global supply of oxygen, it's comforting in another way to know that you are wrong. Sure, in a perfect world I would love for you to get even a moment of realization that your god is a lie and that there is nothing after death. But I suppose it is just going to have to be enough for me to know that you are wrong, and that you have lived your entire life following a lie, that there is nothing after you die and that you will never experience the afterlife that you so desperately fucking desire. It is going to have to be enough for me to know that you are fucking pathetic and that you have devoted your whole worthless life to childish make-believe bullshit, and that there is no payoff for you. That the only thing that is waiting for you after death is fucking dirt. You'll never get to know it though, I'll just have to enjoy that absolute fact for you.

Fuck you forever. Die horribly, painfully, and alone, you monstrous, arrogant, fat fucking pedophile. I truly wish nothing but the worst for you. Get cancer soon! Your god does not exist! Hail Satan!

Signed,

You know who the fuck this is bitch. I moon the world.

EXHIBIT 2



DEPARTMENT OF HOMELAND SECURITY

HOMELAND SECURITY INVESTIGATIONS

REPORT OF INVESTIGATION

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07/04/2023 19:58 EDT

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CASE NUMBER

[REDACTED]

CASE OPENED

11/30/2022

CURRENT CASE TITLE

REGER, Bradley

REPORT TITLE

DHS Travel Records - Bradley
REGER

SYNOPSIS

On November 15, 2022, Homeland Security Investigations Sacramento (HSI/SO) received information from the California Department of Consumer Affairs (DCA) regarding an individual, Bradley Earl REGER, who is an active licensed nurse practitioner in the state of California. Numerous individuals have alleged inappropriate sexual conduct and sexual assault as minors which took place across the United States and multiple countries. HSI/SO will assist in further development of this investigation alongside DCA and the Federal Bureau of Investigation.

This Report of Investigation (ROI) documents travel records for Bradley REGER from Department of Homeland Security (DHS) databases.

REPORTED BY

Dana Unger

SPECIAL AGENT

APPROVED BY

Craig Squire

SPECIAL AGENT

DATE APPROVED

7/4/2023

Current Case Title

REGER, Bradley

ROI Number

[REDACTED]

Date Approved

7/4/2023

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DEPARTMENT OF HOMELAND SECURITY
HOMELAND SECURITY INVESTIGATIONS
REPORT OF INVESTIGATION
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DETAILS OF INVESTIGATION

Since November 2022, HSI/SO Special Agents (SA) Dana Unger and Caitlin Thomas have reviewed travel records relating to Bradley REGER, who is under investigation for various child exploitation violations including violations of 18 USC 2423(c) - Engaging in Illicit Sexual Conduct in Foreign Places.

The investigation revealed that REGER travels internationally frequently and these trips include last minute reservations, last minute changes to reservations, and a different pattern of booking roundtrip international flights. Since approximately 2019, REGER has made international travel reservations that reflect an international departure location and an international return location, which is atypical for a United States Citizen (USC), who resides in the U.S. and will travel from the U.S.

According to queries in DHS databases, REGER has traveled internationally approximately 235 times between 2004 and 2023. An analysis of REGER's travel revealed that he has also crossed the U.S./Canadian border via vehicle on at least two (2) occasions. U.S. Customs and Border Protection (CBP) identified all occupants of the vehicle, which included victims identified during the joint investigation.

REGER's travel includes destinations such as Dominica, Ukraine, Poland, Spain, Ireland, U.K., Philippines, South Korea, Czech Republic, Japan, Qatar, Iceland, Israel, France, Germany, UAE, Jordan, the Netherlands, Ghana, Hong Kong, Finland, Senegal, Mexico, Haiti, China, Canada, Hungary, Singapore, Trinidad and Tobago, Belize, and Kenya.

The joint investigation has revealed that numerous identified victims and potential victims have accompanied REGER on international trips. HSI and FBI have conducted several interviews of victims in which they describe abuse occurring overseas in countries such as Poland, Ukraine, and the Philippines. Additionally, the victims described these international trips as Mission trips, "Work and Witness" trips, and/or affiliated with the Susanville Church of the Nazarene.

On June 30, 2023, HSI submitted a U.S. Customs and Border Protection Request for Information Disclosure to CBP Office of Privacy requesting certified CBP border crossing / travel records for REGER.

The HSI/SO investigation continues.

Current Case Title

REGER, Bradley

ROI Number



Date Approved

7/4/2023

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