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SEALED
BY ORDER OF THE COURT

ORIGINAL

KENNETH M. SORENSON
United States Attorney
District of Hawaii

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

AUG 20 2026

at 2 o'clock and 05 min. P M
Lucy H. Carrillo, Clerk

BARBARA EUCKER
Assistant U.S. Attorney
EDUARDO PALOMO
Trial Attorney
Room 6-100, PJKK Federal Bldg.
300 Ala Moana Boulevard
Honolulu, Hawaii 96850
Telephone: (808) 541-2850
Facsimile: (808) 541-2958
Email: Barbara.Eucker@usdoj.gov
Eduardo.Palomo2@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DONALD STEVEN LANG,

Defendant.

CASE NO. CR 26 - 00098 DKW

INDICTMENT

[18 U.S.C §§ 2251(a) and 2251(e)]

INDICTMENT

The Grand Jury charges:

Sexual Exploitation of Children
(18 U.S.C. §§ 2251(a) and (e))

On a date unknown between on or about September 4, 2024 and on or about December 31, 2024, in the District of Hawaii and elsewhere, DONALD STEVEN LANG, the defendant, did attempt to and did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce, and in and affecting such commerce, which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depiction was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting such commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

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Forfeiture Notice

1. The allegations set forth in this Indictment are hereby re-alleged and incorporated by reference for the purpose of noticing forfeiture pursuant to Title 18, United States Code, Section 2253.

2. The United States hereby gives notice to the defendant that upon conviction of the offense alleged in Count 1 of this Indictment, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 2253(a), of (a) any visual depiction described in Title 18, United States Code, Section 2252A, and any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of that section; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property. The property subject to forfeiture includes, but is not limited to, the following:

- a. All digital devices and storage media containing child pornography, including a Samsung Galaxy S22 Ultra phone with serial number RFCTB016CGP; and

- b. The *Ishi*, a 55-foot, 1985 Taylor Hatfield oceangoing sailing vessel, bearing hull identification number HAZ6556GA585.

3. If by any act or omission of the defendant, any of the property subject to forfeiture described in paragraph 2 herein:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

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the United States will be entitled to forfeiture of substitute property up to the value of the property described above in paragraph 2, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

DATED: August 20, 2026, at Honolulu, Hawaii.

A TRUE BILL

/s/ Foreperson
FOREPERSON, GRAND JURY


KENNETH M. SORENSON
United States Attorney
District of Hawaii


BARBARA EUCKER
Assistant U.S. Attorney
EDUARDO PALOMO
Trial Attorney

United States v. Donald Steven Lang
Indictment
Case No.

CR 26-00098 DKW