

IRELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,)	FILED UNDER SEAL
)	
)	Cr. No. <u>2:25-cr-20027-SHL</u>
Plaintiff,)	
)	17 U.S.C. § 506(a)(1)(A)
vs.)	18 U.S.C. § 2
)	18 U.S.C. § 2314
STEVEN R. HALE,)	18 U.S.C. § 2319(a) & (b)(1)
)	
Defendant.)	

INDICTMENT

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment:

Victim-1 was a multinational company that provided creative services and technology products to the entertainment, media, and communication industries, and had an office in Memphis, Tennessee. A division of Victim-1 manufactured and distributed digital video discs (“DVDs”) and Blu-ray discs (“Blu-rays”).

From in or about February 2021, to in or about March 2022, defendant **STEVEN R. HALE** worked at Victim-1 in Memphis, Tennessee, handling DVDs and Blu-rays. Many of these DVDs and Blu-rays were being prepared for commercial distribution in the United States and not yet available for sale to the public, that is, they were “pre-release” DVDs and Blu-rays.

Defendant **STEVEN R. HALE** stole numerous pre-release DVDs and Blu-rays from Victim-1 and sold them over the internet through e-commerce sites. At least one pre-release Blu-ray that Hale stole and sold, “Spider-Man: No Way Home,” was

“ripped”—that is, extracted from the Blu-ray by bypassing the encryption that prevents unauthorized copying—copied, and made available over the internet more than a month before the Blu-ray’s official scheduled release date. Copies of “Spider-Man: No Way Home,” were downloaded tens of millions of times, with an estimated loss to the copyright owner of tens of millions of dollars.

COUNT 1

(CRIMINAL COPYRIGHT INFRINGEMENT)

Between on or about May 18, 2021, and on or about November 13, 2021, in the Western District of Tennessee and elsewhere the defendant,

STEVEN R. HALE,

did willfully, and for purposes of commercial advantage and private financial gain, infringe a copyright by distributing during a 180-day period ten or more copies of one or more copyrighted works, including pre-release copies of the motion pictures “Godzilla v. Kong,” “Cruella,” “F9: The Fast Saga,” “The Boss Baby 2: Family Business,” “Escape Room: Tournament of Champions,” “Black Widow,” “Snake Eyes,” “Old,” “The Suicide Squad,” “Free Guy,” and “Candyman,” and others, together having a total retail value of more than \$2,500; all in violation of Title 17, United States Code, Section 506(a)(1)(A), Title 18, United States Code, Sections 2319(a) and (b)(1), and Section 2.

COUNT 2

(CRIMINAL COPYRIGHT INFRINGEMENT)

Between on or about November 14, 2021, and on or about May 12, 2022, in the Western District of Tennessee and elsewhere the defendant,

STEVEN R. HALE,

did willfully, and for purposes of commercial advantage and private financial gain, infringe

a copyright by distributing during a 180-day period ten or more copies of one or more copyrighted works, including pre-release copies of the motion pictures “Jungle Cruise,” “Venom: Let There Be Carnage,” “Shang-Chi and the Legend of the Ten Rings,” “Resident Evil: Welcome to Raccoon City,” “Encanto,” “Eternals,” “The King’s Man,” “The Matrix Resurrections,” “Marry Me,” “Sing 2,” “Spider-Man: No Way Home,” and others, together having a total retail value of more than \$2,500; all in violation of Title 17, United States Code, Section 506(a)(1)(A), Title 18, United States Code, Sections 2319(a) and (b)(1), and Section 2.

COUNT 3

(INTERSTATE TRANSPORTATION OF STOLEN GOODS)

Between on or about February 11, 2021, and on or about March 27, 2022, in the Western District of Tennessee and elsewhere the defendant,

STEVEN R. HALE,

transported and transferred, in interstate and foreign commerce, goods, wares, and merchandise with a value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud; all in violation of Title 18, United States Code, Section 2314 and Section 2.

A TRUE BILL:

F O R E P E R S O N

DATED: February 13, 2025

**REAGAN TAYLOR FONDREN
ACTING UNITED STATES ATTORNEY**