

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**BILL OF INFORMATION FOR RECEIPT OF MATERIALS INVOLVING  
THE SEXUAL EXPLOITATION OF MINORS AND NOTICE OF FORFEITURE**

<b>UNITED STATES OF AMERICA</b>	<b>*</b>	<b>CRIMINAL NUMBER:</b>
<b>v.</b>	<b>*</b>	<b>SECTION:</b>
<b>NICHOLAS BROEKMAN</b>	<b>*</b>	<b>VIOLATION: 18 U.S.C. § 2252(a)(2)</b>
		<b>18 U.S.C. § 2253</b>
<b>*</b>	<b>*</b>	<b>*</b>

The United States Attorney charges that:

**COUNT 1**

**(Receipt of Child Pornography)**

Beginning at a time unknown and continuing until on or about June 25, 2009, within the Eastern District of Louisiana, and elsewhere, **NICHOLAS BROEKMAN**, defendant herein, did knowingly receive, and attempt to receive visual depictions, that is, digital images, computer images, and digital video files, that had been mailed, shipped, and transported in interstate and foreign commerce, by any means, including by computer, the production of such visual depictions having involved the use of a minor engaging in sexually explicit conduct, as defined

in Title 18, United States Code, Section 2256(2), and such visual depictions were of such conduct.

All in violation of Title 18, United States Code, Section 2252(a)(2).


### **FORFEITURE ALLEGATION**

1. The allegations of this Bill of Information are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 2253.

2. If convicted of the offense or offenses set forth above, **NICHOLAS BROEKMAN**, the defendant herein, shall forfeit to the United States any and all materials and property used and intended to be used in the receipt and possession of visual depictions of minors engaging in sexually explicit conduct, and any and all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense. Such property includes, but is not limited to, the following specific items found by federal agents on or about June 25, 2009:


1. Dell Inspiron Laptop, serial number B611601;
2. HP Laptop, serial number CNF6471NQ0;
3. Blackberry 8130, ESN: 07607132679;

4. Numerous compact discs and zip discs;
5. Numerous printed images depicting the sexual victimization of children.




---

JIM LETTEN  
United States Attorney  
Louisiana Bar Roll No. 8517



---

JAN MASELLI MANN  
First Assistant U.S. Attorney  
Chief, Criminal Division  
Louisiana Bar Roll No. 9020



---

JAMES R. MANN  
Assistant U.S. Attorney  
Supervisor, Financial/Computer Crimes Unit  
Louisiana Bar Roll No. 20513



---

BRIAN M. KLEBBA  
Assistant United States Attorney

New Orleans, Louisiana  
January 5, 2010