

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

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

UNITED STATES OF AMERICA	*	CRIMINAL NUMBER:
v.	*	SECTION:
JOSEPH ST. PIERRE	*	VIOLATION: 18 U.S.C. § 2252(a)(2)
	*	18 U.S.C. § 2253
	*	*

The United States Attorney charges that:

COUNT 1

(Receipt of Child Pornography)

Beginning at a time unknown and continuing until on or about April 27, 2011, within the Eastern District of Louisiana, and elsewhere, **JOSEPH ST. PIERRE**, defendant herein, did knowingly 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, **JOSEPH ST. PIERRE**, 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 law enforcement officials on or about April 27, 2011:

1. Toshiba Laptop Computer, serial number 49056182Q.



JIM LETTEN

United States Attorney
Louisiana Bar Roll No. 8517



JAN MASELLI MANN

First Assistant United States Attorney
Chief, Criminal Division
Louisiana Bar Roll No. 9020



JAMES R. MANN

Assistant United States Attorney
Supervisor, Financial/Computer Crimes Unit
Louisiana Bar Roll No. 20513



BRIAN M. KLEBBA

Assistant United States Attorney
New York Bar Roll No. 2938728

New Orleans, Louisiana
September 29, 2011