# FELONY

### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

## INDICTMENT FOR FAILURE TO REGISTER AS A SEX OFFENDER

UNITED STATES OF AMERICA

v.

CRIMINAL DOCKET NO.

\* SECTION:

JOHN C. WRIGHT, JR.

**VIOLATION: 18 U.S.C. § 2250(a)** 

\* \*

The Grand Jury charges that:

#### **COUNT 1**

#### A. AT ALL TIMES MATERIAL HEREIN:

1. On or about June 7, 2007, **JOHN C. WRIGHT, JR. (WRIGHT)** entered a plea of guilty to: Unlawful Sexual Conduct with a Minor, in violation of Ohio Revised Code Section 2907.04(a), a felony of the fourth degree; and Illegal Use of Minor in Nudity-Oriented Material or Performance, in violation of Ohio Revised Code Section 2907.323(A)(3), a felony of the fifth degree, in the Common Pleas Court, Ashland County, Ohio, under Case No. 07-CRI-021.

- 2. On or about September 10, 2007, **WRIGHT** was declared a sexual predator by a judge of the Court of Common Pleas, Ashland County, Ohio and **WRIGHT** was provided with notice that he would have to register as a sex offender for the remainder of his life.
- 3. **WRIGHT** was required to complete a Notice of Registration Duties of Sexually Oriented Offender or Child-Victim Offender Form (Registration Form) every time he changed his address.
- 4. From on or about September 10, 2007, through on or about June 26, 2011, **WRIGHT** completed approximately 35 Registration Forms.
- 5. At sometime unknown, but after on or about June 26, 2011, **WRIGHT** moved from Ohio to Louisiana and failed to notify law enforcement authorities of his move to Louisiana.

#### B. <u>THE OFFENSE</u>:

Beginning at sometime after on or about June 26, 2011, to on or about February 8, 2012, the defendant, **JOHN C. WRIGHT**, **JR.**, a person required to register under the Sex Offender

Registration and Notification Act, traveled in interstate commerce and did knowingly fail to register and update a registration.

All in violation of Title 18, United States Code, Section 2250(a).

A TRUE BILL:

**FOREPERSON** 

JIM LEATEN (8517)

UNITED STATES ATTORNEY

AN MASELLI MANN (9020)

First Assistant United States Attorney

JAMES R. MANN (20513)

Assistant United States Attorney

BRIAN M. KLEBBA (NY 2938728)

Assistant United States Attorney

February 23, 2012

New Orleans, Louisiana