

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.:</b> _____
<b>v.</b>	:	<b>DATE FILED:</b> _____
<b>JOHN RUSSELL, a/k/a "Jack Russell"</b>	:	<b>VIOLATIONS:</b>
	:	<b>18 U.S.C. § 2252(a)(4)(B) (possession of child pornography - 1 count)</b>
	:	<b>18 U.S.C. § 2252(a)(2) (receipt of child pornography - 1 count)</b>
	:	<b>Notice of Forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about August 15, 2008, in Levittown, in the Eastern District of Pennsylvania, defendant

**JOHN RUSSELL,  
a/k/a "Jack Russell"**

knowingly possessed computer hard drives, which contained visual depictions that had been shipped and transported in interstate commerce. The production of each visual depiction involved the use of a minor or minors engaging in sexually explicit conduct and each visual depiction was of a minor or minors engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 15, 2008, in Levittown, in the Eastern District of Pennsylvania, defendant

**JOHN RUSSELL,  
a/k/a “Jack Russell”**

knowingly received a visual description that had been shipped and transported in interstate commerce. This visual description, contained in the computer file named “Gay preteen - 2 Thai Boys in bed with 1 man - kiddie pedo boy lolita R@ygold underage.partial.mpg,” was a visual depiction of a minor engaging in sexually explicit conduct and the production of this visual depiction involved the use of a minor engaged in such conduct.

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

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Sections 2252(a)(2) and 2252(a)(4), set forth in this indictment, defendant

**JOHN RUSSELL,  
a/k/a “Jack Russell”**

shall forfeit to the United States of America any (1) visual depictions described in the above sections, (2) any matter which contains any such visual depiction which was received or possessed in violation of any of the charged sections, and (3) any property used or intended to be used, in any manner or part, to commit or to promote the commission of, the offenses charged in this indictment, including, but not limited to:

1. One Dell XPS 400, Serial Number FFYXJ91, desktop computer
2. One Western Digital My Book, 500 gigabyte external SATA hard drive, Model WD500AAKS, Serial Number WCAPW2255352
3. One Western Digital WD800, 80 gigabyte hard drive, Serial Number WCA8E5354266
4. Western Digital WD400, 40 gigabyte hard drive, Serial Number WMA6R3009101

All pursuant to Title 18, United States Code, Section 2253 and Title 21, United States Code, Section 853.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**MICHAEL L. LEVY  
United States Attorney**