

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

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED
THOMAS GORDON, JR.	:	VIOLATIONS:
	:	18 U.S.C. § 2252(a)(1) (distribution of material involving the sexual exploitation of children – 12 counts)
	:	18 U.S.C. § 2252(a)(4)(B) (possession of material involving the sexual exploitation of children – 1 count)
	:	Notice of forfeiture

INDICTMENT

COUNTS ONE THROUGH TWELVE

THE GRAND JURY CHARGES THAT:

1. At all times material to this Indictment, the defendant, THOMAS GORDON, JR., was a subscriber to the online service, Facebook, using multiple accounts with multiple identities and associated e-mail accounts.

2. Among the Facebook accounts used by the defendant, THOMAS GORDON, JR., were the following:

	<u>SCREEN NAME</u>	<u>ASSOCIATED E-MAIL ACCOUNT</u>
a.	Tom Gibson	treynolds922@ymail.com
b.	Tom Gibbons	tgibbons7923@yahoo.com
c.	TomGibbons	tgibbons1964@gmail.com
d.	TomGibbons	tgibbons7923@gmail.com
e.	TomGibbons	tgibbons3928@yahoo.com
f.	Mark Rogers	m.rogers64@ymail.com

3. The defendant, THOMAS GORDON, JR., used these accounts to upload and store images of the sexual exploitation of minor children.

4. On or about each of the dates listed below, each date constituting a separate count of this Indictment, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

THOMAS GORDON, JR.

knowingly transported and shipped, using a facility of, and in and affecting, interstate and foreign commerce, that is, the Internet, from Philadelphia PA to the servers of Facebook in California, visual depictions, showing minors engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors engaged in sexually explicit conduct:

<u>COUNT NO.</u>	<u>DATE</u>	<u>FACEBOOK ACCOUNT ASSOCIATED WITH E-MAIL ACCOUNT</u>	<u>NUMBER OF IMAGES</u>
1.	02/02/2011	<u>treynolds922@ymail.com</u>	18
2.	02/03/2011	<u>treynolds922@ymail.com</u>	7
3.	02/04/2011	<u>treynolds922@ymail.com</u>	6
4.	02/05/2011	<u>treynolds922@ymail.com</u>	1
5.	02/06/2011	<u>treynolds922@ymail.com</u>	4
6.	02/15/2011	<u>m.rogers64@ymail.com</u>	6
7.	02/20/2011	<u>tgibbons7923@gmail.com</u>	12
8.	02/24/2011	<u>tgibbons1964@gmail.com</u>	21
9.	02/24/2011	<u>tgibbons7923@yahoo.com</u>	15
10.	02/26/2011	<u>tgibbons7923@yahoo.com</u>	2
11.	02/27/2011	<u>tgibbons7923@yahoo.com</u>	1
12.	03/01/2011	<u>tgibbons7923@yahoo.com</u>	<u>11</u>

<u>COUNT</u> <u>NO.</u>	<u>DATE</u>	<u>FACEBOOK ACCOUNT ASSOCIATED</u> <u>WITH E-MAIL ACCOUNT</u>	<u>NUMBER OF</u> <u>IMAGES</u>
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	TOTAL		104
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All in violation of Title 18, United States Code, Section 2252(a)(1).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 24, 2011, at Philadelphia, in the Eastern District of Pennsylvania, defendant

THOMAS GORDON, JR.

knowingly possessed one or more books, magazines, periodicals, films, video tapes and other matter, namely computer hard drive(s) and flash drives, which contained more than 600 visual depictions that had been shipped and transported in and affecting interstate and foreign commerce. The production of these visual depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of minors engaging in sexually explicit conduct.

In violation of Title 18 U.S.C. § 2252(a)(4)(B).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 2252,
defendant

THOMAS GORDON, JR.

shall forfeit to the United States of America any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense(s), including, but not limited to:

One HP laptop computer, bearing serial number CNF9498ZGV

PNY Optima Pro Attaché 4 GB thumb drive

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

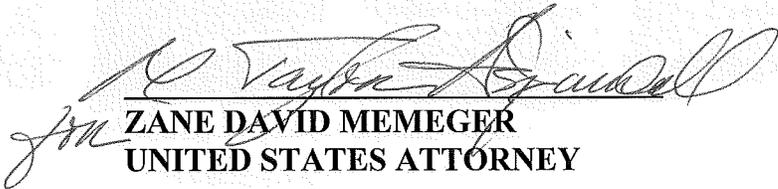
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

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

A TRUE BILL:

GRAND JURY FOREPERSON



ZANE DAVID MEMEGER
UNITED STATES ATTORNEY