

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : HON.
: :
: Criminal No. 23-
v. : :
: :
: 18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1)
WILLIAM MICKEL : 18 U.S.C. § 2252A(a)(5)(B)
: :

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges as follows:

COUNT ONE
(Distribution of Child Pornography)

In or around February 2022, in Morris County, in the District of New Jersey,
and elsewhere, the defendant,

WILLIAM MICKEL,

did knowingly distribute child pornography, as defined in Title 18, United States
Code, Section 2256(8), which had been mailed, and, using any means and facility of
interstate and foreign commerce, shipped, and transported in and affecting
interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A) and (b)(1).

COUNT TWO
(Possession of Child Pornography)

In or around April 2022, in Morris County, in the District of New Jersey, and elsewhere, the defendant,

WILLIAM MICKEL,

did knowingly possess and access with intent to view material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATION

The United States hereby gives notice that upon the conviction of the defendant WILLIAM MICKEL of the offenses in violation of Title 18, United States Code, Section 2252A charged in Counts One and Two of this Indictment, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 2253, of all right, title and interest of the defendant in the following:

- (a) any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Part I, Chapter 110;
- (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in Counts One and Two of this Indictment, and all property traceable to such property; and
- (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, and all property traceable to such property.

Substitute Assets Provision

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:


- (a) cannot be located upon the exercise of due diligence;

- (b) has been transferred or sold to, or deposited with, a third person;
- (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 subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253, to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL

FOREPERSON


PHILIP R. SELLINGER
United States Attorney