

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

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

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
ERIN PITRE	*	VIOLATION: 18 U.S.C. § 2252(a)(4)(B)
	*	18 U.S.C. § 2252(b)(2)
	*	18 U.S.C. § 2253
	*	
	*	
	*	

The United States Attorney charges that:

COUNT 1 - POSSESSION OF CHILD PORNOGRAPHY

Beginning at a time unknown and continuing until on or about January 22, 2015, within the Eastern District of Louisiana, the defendant, **ERIN PITRE**, did knowingly possess one or more matters, that is, computer media, containing digital videos and computer images, that contained visual depictions that had been mailed, shipped, and transported in interstate and foreign commerce, and that were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, by any means including by computer, the production of which involved the use of a minor who was prepubescent and under the age of twelve (12)-years-old 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, Sections 2252(a)(4)(B) and 2252(b)(2).

NOTICE OF FORFEITURE

1. The allegations of this Bill of Information are re-alleged as if fully set forth herein, 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, the defendant, **ERIN PITRE**, 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, as well as any and all property, either 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 federal agents on or about January 22, 2015:

- a. One (1) PNY 32 GB thumb drive, silver in color; no serial number or other markings

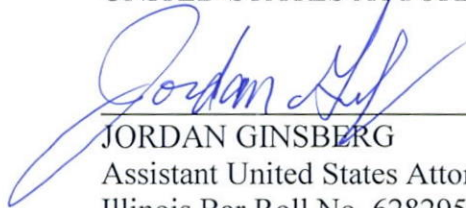
3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- 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 18, United States Code, Section 2253(o) to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 2253.

KENNETH ALLEN POLITE, JR.
UNITED STATES ATTORNEY



JORDAN GINSBERG
Assistant United States Attorney
Illinois Bar Roll No. 6282956

New Orleans, Louisiana
June 15, 2015