

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

FEB 28 2017 W

MATTHEW J. DYKMAN
CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
JESSE FURSE,)
)
Defendant.)

CRIMINAL NO. 17-569 JB
Counts 1-8 18 U.S.C. §§ 2252A(a)(2), (b)(1),
2256: Distribution of Visual Depictions of
Minors Engaged in Sexually Explicit Conduct;
Count 9: 18 U.S.C. §§ 2252A(a)(5)(B), (b)(2),
and 2256: Possession of Visual Depictions of
Minors Engaged in Sexually Explicit Conduct.

INDICTMENT

The Grand Jury charges:

Count 1

On or about October 10, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **JESSE FURSE**, did knowingly distribute and attempt to distribute child pornography that 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, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(2), (b)(1), and 2256.

Count 2

On or about October 23, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **JESSE FURSE**, did knowingly distribute and attempt to distribute child pornography that 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, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(2), (b)(1), and 2256.

Count 3

On or about November 1, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **JESSE FURSE**, did knowingly distribute and attempt to distribute child pornography that 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, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(2), (b)(1), and 2256.

Count 4

On or about November 5, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **JESSE FURSE**, did knowingly distribute and attempt to distribute child pornography that 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, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(2), (b)(1), and 2256.

Count 5

On or about December 17, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **JESSE FURSE**, did knowingly distribute and attempt to distribute child pornography that 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, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(2), (b)(1), and 2256.

Count 6

On or about December 26, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **JESSE FURSE**, did knowingly distribute and attempt to distribute child pornography that 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, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(2), (b)(1), and 2256.

Count 7

On or about January 1, 2016, in Bernalillo County, in the District of New Mexico, the defendant, **JESSE FURSE**, did knowingly distribute and attempt to distribute child pornography that 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, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(2), (b)(1), and 2256.

Count 8

On or about January 17, 2016, in Bernalillo County, in the District of New Mexico, the defendant, **JESSE FURSE**, did knowingly distribute and attempt to distribute child pornography

that 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, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(2), (b)(1), and 2256.

Count 9

From on or about May 18, 2014, and continuing to on or about January 29, 2016, in Bernalillo County, in the District of New Mexico, the defendant, **JESSE FURSE** did knowingly possess child pornography that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, and which was produced using materials which had been mailed, and shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, an Arctic external hard drive, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(5)(B), (b)(2), and 2256.

FORFEITURE ALLEGATION

Upon conviction of any of the violations alleged in this Indictment involving violations of 18 U.S.C. §§ 2252A(a)(2) and 2252A(a)(5)(B), Defendant **JESSE FURSE** shall forfeit to the United States, pursuant to 18 U.S.C. § 2253, any and all of the defendant's right, title and interest in:


- A. Arctic External Hard Drive, containing a 500 GB Toshiba MK5059GSXP hard drive, S/N 21BLF0WZS MC3 EC.A.

A TRUE BILL:

/S/
FOREPERSON OF THE GRAND JURY



Assistant United States Attorney

 02/23/17 4:50PM