

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**BILL OF INFORMATION FOR SEXUAL EXPLOITATION OF CHILDREN,
POSSESSION OF CHILD PORNOGRAPHY, AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
	*	
v.	*	SECTION:
	*	
JOHNNY SMITH	*	VIOLATION: 18 U.S.C. §2251(a)
	*	18 U.S.C. §2251(e)
	*	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 ONE - SEXUAL EXPLOITATION OF CHILDREN

Beginning at a time unknown, but not later than on or about May 12, 2013, and continuing until on or about June 23, 2013, in the Eastern District of Louisiana, the defendant, **JOHNNY SMITH**, did knowingly attempt to employ, use, persuade, induce, entice, and coerce a minor, namely **Victim 1**, a three (3)-year-old girl, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be produced and transmitted using materials that have been

mailed, shipped, and transported in and affecting interstate or foreign commerce and using any means and facility of interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO - POSSESSION OF CHILD PORNOGRAPHY

Beginning at a time unknown and continuing until on or about June 23, 2013, within the Eastern District of Louisiana, and elsewhere, the defendant, **JOHNNY SMITH**, did knowingly possess one or more matters, that is, computer media, containing digital images 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 Counts 1 and 2 of this Bill of Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 2253.

2. As a result of the offenses alleged in Counts 1 and 2, the defendant, **JOHNNY SMITH**, shall forfeit to the United States all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and/or any property, real or

personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, in violation of Title 18, United States Code, Sections 2251(a) and 2252(a)(2), including but not limited to:

- (1) One (1) 250 GB Seagate hard drive SN: 5ND2991G, Model: ST3250823A;
- (2) One (1) thumb drive (black and white in color); no serial number or other markings; and
- (3) One (1) HP Pavilion Elite Desktop (black in color), SN: MXY942023B.

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;

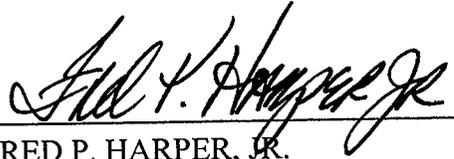
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) 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.



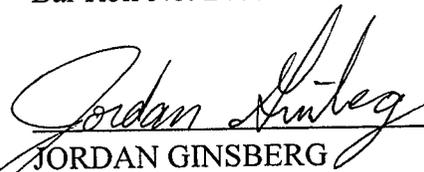
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New Orleans, Louisiana
September 17, 2013