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U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

**SUPERSEDING BILL OF INFORMATION
FOR CONSPIRACY TO PRODUCE
CHILD PORNOGRAPHY AND NOTICE OF FORFEITURE**

| | | |
|--------------------------|---|--------------------------------|
| UNITED STATES OF AMERICA | * | CRIMINAL NUMBER: 13-257 |
| v. | * | SECTION: "E" |
| STANLEY ZDON, III | * | VIOLATION: 18 U.S.C. § 2251(a) |
| | * | 18 U.S.C. § 2251(e) |
| | * | 18 U.S.C. § 2253 |
| | * | * |
| | * | * |

The United States Attorney charges that:

COUNT 1

CONSPIRACY TO PRODUCE CHILD PORNOGRAPHY

Between on or about December 15, 2012, and continuing until on or about October 5, 2013, within the Eastern District of Louisiana and elsewhere, the defendant, **STANLEY ZDON, III** and another person known to the United States Attorney, did knowingly conspire to employ, use, persuade, induce, entice, and coerce a minor victim to engage in sexually explicit conduct

for the purpose of producing any visual depiction of such conduct using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

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

NOTICE OF FORFEITURE

1. The allegations of Count 1 of this Superseding 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 Count 1, defendant, **STANLEY ZDON, III**, 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 offenses, in violation of Title 18, United States Code, Sections 2251(a) and (e), and 2253.

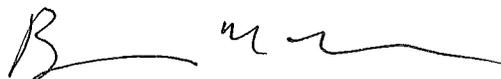
3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- 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

A handwritten signature in black ink, appearing to read "B M K", written over a horizontal line.

BRIAN M. KLEBBA
Assistant United States Attorney
New York Bar Roll No. 2938728

New Orleans, Louisiana
January 30, 2014