

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO. 12-**
v. : **DATE FILED: _____**
RICHARD HAINES, JR. : **VIOLATIONS:**
: **18 U.S.C. § 2251(a), 2251(e) (using or**
: **inducing a child to pose for child**
: **pornography images - 4 counts)**
: **18 U.S.C. § 2252(a)(4)(B) (possession**
: **of child pornography - 1 count)**
: **Notice of forfeiture**

INDICTMENT

COUNTS ONE THROUGH FOUR

THE GRAND JURY CHARGES:

On or about each of the dates listed below (each date constituting a separate count of this Indictment) in Denver, in the Eastern District of Pennsylvania, the defendant,

RICHARD HAINES, JR.

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Minor #1, a minor whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of that conduct and the visual depictions were produced using materials that had been sent by mail and shipped and transported in and affecting interstate and foreign commerce.

Count One	October 4, 2010
Count Two	November 7, 2010
Count Three	March 15, 2011

Count Four

June 1, 2011

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about, February 24, 2012, in Denver, in the Eastern District of Pennsylvania, defendant

RICHARD HAINES, JR.

knowingly possessed books, magazines, periodicals, films, video tapes and other matter, namely a computer hard drive and a camera, which contained visual depictions that had been produced using materials which had been shipped and transported in interstate and foreign commerce. The production of these visual depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of minors engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 2251(a), and 2252(a)(4), set forth in this indictment, defendant

RICHARD HAINES, JR.

shall forfeit to the United States of America any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 18, United States Code, Sections 2252(a)(2) and (4), as charged in this indictment, including, but not limited to:

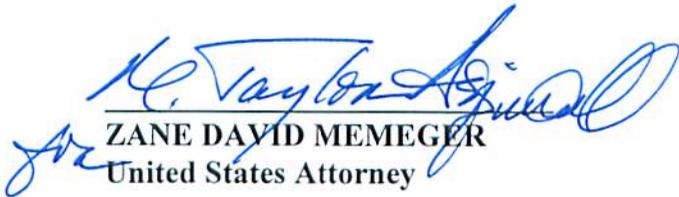
1. Camera: Kodak Easy Share CD82, S/N: KCGMC93539329, color: blue, manufacturer's label states "Made in China;"
2. Computer: Black Dell Tower, Key #: HTDXY-KXH2W-DYQXD-8FY8K-X3XPJ;
3. Computer: White computer tower, no serial number;
4. Computer: Black computer tower, no serial number;
5. External hard drive: Maxtor external hard drive 200GB, S/N: L41H0L1H, manufacturer's label states "Assembled in China from components from Singapore and China."

6. External hard drive: Seagate Free Agent external hard drive, S/N: NA0L6NEC, manufacturer's label states "Product of China"

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

GRAND JURY FOREPERSON


ZANE DAVID MEMEGER
United States Attorney