

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: June 4, 2013</b>
<b>CHRISTOPHER MAILLOUX</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 2251(a), (e)</b>
	<b>:</b>	<b>(Production of child pornography -</b>
	<b>:</b>	<b>2 counts);</b>
	<b>:</b>	<b>18 U.S.C. § 2252(a)(4)(B), (b)(2)</b>
	<b>:</b>	<b>(Possession of child pornography -</b>
	<b>:</b>	<b>2 counts)</b>
		<b>18 U.S.C. § 2 (aiding and abetting)</b>
		<b>Notice of Forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

Between on or about November 28, 2012, and on or about December 5, 2012, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER MAILLOUX**

employed, used, persuaded, induced, enticed, and coerced Minor 1, who was under the age of 18, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer, and attempted to do so, and aided and abetted the same.

In violation of Title 18, United States Code, Sections 2251(a) and (e) and 2256(2)(A)(v) and 2.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

Between on or about November 28, 2012, and on or about December 5, 2012, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER MAILLOUX**

employed, used, persuaded, induced, enticed, and coerced Minor 2, who was under the age of 18, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer, and attempted to do so, and aided and abetted the same.

In violation of Title 18, United States Code, Sections 2251(a) and (e) and 2256(2)(A)(v) and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

Between on or about November 3, 2012 and on or about December 12, 2012, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER MAILLOUX**

knowingly possessed, and attempted to possess, 1 or more books, magazines, periodicals, films, video tapes, or other matter, that is, a NZXT computer containing a Western Digital hard drive serial number WMC1S0742588 and a Western Digital hard drive serial number WMC1S0743428, which contained visual depictions that had been mailed and had been shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and were produced using materials that had been mailed, shipped, and transported, in interstate and foreign commerce, and aided and abetted the same. The producing of the visual depictions involved the use of minors engaging in sexually explicit conduct, and the visual depictions were of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2) and 2.

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

Between on or about November 23, 2011 and on or about November 30, 2012, in the Eastern District of Pennsylvania, defendant

**CHRISTOPHER MAILLOUX**

knowingly possessed, and attempted to possess, 1 or more books, magazines, periodicals, films, video tapes, or other matter, that is, a HP Pavilion dv6 Notebook PC laptop containing a Hitachi hard drive serial number 110602J2180053GKZWED, which contained visual depictions that had been mailed and had been shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and were produced using materials that had been mailed, shipped, and transported, in interstate and foreign commerce, and aided and abetted the same. The producing of the visual depictions involved the use of minors engaging in sexually explicit conduct, and the visual depictions were of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2) and 2.

## NOTICE OF FORFEITURE

### THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 2251 and 2252, set forth in this indictment, and pursuant to Title 18, United States Code, Section 2253, defendant

### CHRISTOPHER MAILLOUX

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, including, but not limited to:

- (a) Child pornography images;
- (b) One NZXT computer containing a Western Digital hard drive serial number WMC1S0742588 and a Western Digital hard drive serial number WMC1S0743428;
- (c) One HP Pavilion dv6 Notebook PC laptop containing a Hitachi hard drive serial number 110602J2180053GKZWED;
- (d) one Apple iPhone; and
- (e) one Sony DSC-HX10 digital camera.

2. If any of the property 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 party;
- (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 divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 1594(d) and (e), and 2253.

**A TRUE BILL:**

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**FOREPERSON**

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**ZANE DAVID MEMEGER**  
**United States Attorney**