

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b> _____
<b>v.</b>	:	<b>DATE FILED:</b> _____
<b>WEI QIN</b>	:	<b>VIOLATIONS:</b>
	:	<b>18 U.S.C. § 2252(a)(1) (transportation of</b>
	:	<b>child pornography) (1 count)</b>
	:	<b>18 U.S.C. § 2252(a)(4) (possession of child</b>
	:	<b>pornography) (1 count)</b>
	:	<b>Notice of forfeiture</b>
	:	
	:	

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about October 13, 2012, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**WEI QIN**

knowingly transported and shipped in interstate and foreign commerce visual depictions, showing minors engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors engaged in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(1).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 7, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**WEI QIN**

knowingly possessed computer hard drives, which contained more than 600 visual depictions that had been mailed, shipped or 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:**

1. As a result of the violations of Title 18, United States Code, Sections 2252(a)(1) and 2252(a)(4)(B), set forth in this indictment, defendant

**WEI QIN**

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)(1) and (a)(4)(B), as charged in this indictment, including, but not limited to:

1. Agio Video Player;
2. Kingston 2G Mini SD card found within D-Link Router bearing serial number QBCZ1B5020901;
3. HP Pavilion s5650z bearing serial number 2MD0470JHD;
4. Nugate External Hard Drive bearing soccer logo;
5. Western Digital External Hard Drive bearing serial number WXC1A72X7257;
6. Sony Vaio bearing service tag J002JBGB;

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

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

  
**LANE DAVID MEMEGER**  
**UNITED STATES ATTORNEY**