

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
BRIAN WELSH : **VIOLATIONS:**
: **18 U.S.C. § 2252(a)(2) (receipt of child**
: **pornography) (1 count)**
: **18 U.S.C. § 2252(a)(2) (distribution of**
: **child pornography) (1 count)**
: **18 U.S.C. § 2252(a)(4)(B) (possession of**
: **child pornography) (1 count)**
: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about May 23, 2012, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

BRIAN WELSH

knowingly received visual depictions that had been shipped in interstate and foreign commerce, which visual depictions showed 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)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 24, 2012, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

BRIAN WELSH

knowingly distributed 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)(2).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 30, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

BRIAN WELSH

knowingly possessed one or more films, video tapes, or other matter, including computer storage files and devices, hard drives and thumb 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:

As a result of the violations of Title 18, United States Code, Sections 2252(a)(2) and 2252(a)(4)(B), set forth in this indictment, defendant

BRIAN WELSH

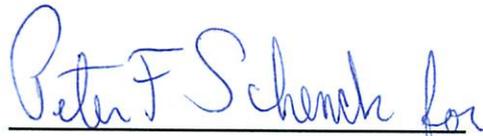
shall forfeit to the United States of America any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 18, United States Code, Sections 2252(a)(2) and (a)(4)(B), as charged in this indictment, including, but not limited to:

1. (1) HP S5000 PC
2. (1) Averatec Laptop
3. (1) VNet Laptop
4. (1) iPhone
5. (1) iPod
6. (1) ZTE Metro PCS Cell Phone
7. (1) Blue Lexar Thumb Drive
8. (1) Yellow Lexar Thumb Drive
8. (1) Black MP3 Player
9. (48) CD/DVDs

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

A TRUE BILL:

GRAND JURY FOREPERSON



ZANE DAVID MEMEGER
UNITED STATES ATTORNEY