

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

TONY MYERS

knowingly received, and attempted to receive, visual depictions, using any means or facility of interstate and foreign commerce, and that had been shipped and transported in interstate and foreign commerce, and that contained materials that had been shipped and transported in or affecting interstate and foreign commerce, by any means including by computer, the producing of which visual depictions involved the use of a minor engaging in sexually explicit conduct, and such visual depictions were of minors engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 2, 2014, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

TONY MYERS

knowingly possessed and knowingly accessed with intent to view, and attempted to possess an HP Pavilion dv7 laptop computer with a Toshiba hard drive and a Thermaltake self-built desktop computer with Toshiba and Samsung hard drives, which contained visual depictions that had been shipped and transported using any means and facility of interstate and foreign commerce, and in or affecting interstate and foreign commerce, and were produced using materials that had been mailed, 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) and (b)(2).

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 (e), 2252(a)(2) and 2252(a)(4)(B), set forth in this indictment, defendant

TONY MYERS

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 2251(a) and (e), 2252(a)(2) and (a)(4)(B), as charged in this indictment, including, but not limited to:

1. One HP Pavilion dv7 laptop computer with a Toshiba hard drive laptop, bearing serial number 61C2B082B
2. One Thermaltake self-built laptop computer with a Toshiba hard drive, bearing serial number Z2TVUJKMSWK7 and with a Samsung hard drive, bearing serial number S07GJ1ML404719
3. One IBM ThinkPad laptop computer with a Fujitsu hard drive, bearing serial number 11S92P6592Z1Z8PY3053GY
4. One Hitachi hard drive, bearing serial number 14R9210BA1250E4A
5. One Western Digital hard drive, bearing serial number WXE0A89E3968
6. One Iomega USB drive, bearing serial number H6AA411030

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

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**

