

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : HON.
 :
 : Criminal No. 13-
 v. :
 : 18 U.S.C. § 2252A(a) (2) (A)
 JONATHAN MARTIN : 18 U.S.C. § 2252A(a) (5) (B)
 : 18 U.S.C. § 2

INDICTMENT

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges:

COUNTS ONE AND TWO

(Distribution of Child Pornography)

1. On or about the dates specified below, in the District
of New Jersey, and elsewhere, the defendant,

JONATHAN MARTIN,

did knowingly distribute and attempt to distribute child
pornography, as defined in Title 18, United States Code, Section
2256(8), which had been mailed, and using any means and facility
of interstate and foreign commerce, shipped, and transported in
and affecting interstate and foreign commerce by any means,
including by computer, each distribution constituting a separate
count of this Indictment.

COUNT	DATE
1	April 30, 2012
2	May 1, 2012

All in violation of Title 18, United States Code, Section
2252A(a)(2)(A) and Section 2.

COUNT THREE

(Possession of Child Pornography)

1. On or about August 7, 2012, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

JONATHAN MARTIN,

did knowingly possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which images had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and which were produced using materials that were shipped and transported in and affecting interstate and foreign commerce, by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B) and Section 2.

FORFEITURE ALLEGATION

1. The allegations contained in pages One through Three of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a).

2. Upon conviction for violating Title 18, United States Code, Sections 2252A(a)(2)(A), 2252A(a)(5)(B), and 2, defendant,

JONATHAN MARTIN,

shall forfeit to the United States any and all matter that contains visual depictions of minors engaged in sexually explicit conduct in violation of the charged offenses; any property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violations or any property traceable to such property, including but not limited to the following:

- a. One Macbook Pro Laptop, Serial Number
C02GK1P6DRJD;
- b. One Toshiba MK7559GSXF 750GB Hard
Drive, Serial Number 91M4CUIXTQR8;
- c. One Lacie Thunderbolt 4000GB External
Hard Drive;

- d. One Seagate ST2000DM001 2000GB Hard Drive, Serial Number S2404VGM;
- e. One Seagate ST2000DM001 2000GB Hard Drive, Serial Number S2404AP1;
- f. One Lacie 1000GB External Hard Drive, Serial Number 13501101053605QR;
- g. One Samsung HD103SJ 1000GB Hard Drive, Serial Number S2C8J9FZB00310;
- h. One Lacie 1000GB External Hard Drive, Serial Number .194906995; and
- i. One Lacie Rugged 1000GB External Hard Drive, Serial Number 14291109300155QR.

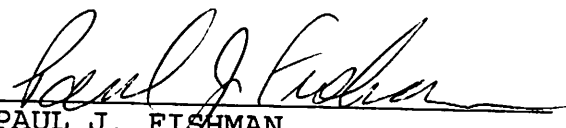
3. If any of the property described above, as a result of any act or omission of the defendant:

- 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853 (p).

A TRUE BILL




PAUL J. FISHMAN
United States Attorney

CASE NUMBER:

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

JONATHAN MARTIN

INDICTMENT FOR

18 U.S.C. § 2252A(a)(2)(A),
18 U.S.C. § 2252A(a)(5)(B) and
18 U.S.C. § 2

PAUL J. FISHMAN

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