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U.S. DISTRICT COURT  
EAST DISTRICT OF LA

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**BILL OF INFORMATION FOR POSSESSION OF CHILD  
PORNOGRAPHY, NOTICE OF SENTENCE ENHANCEMENT,  
AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

\*

CRIMINAL NO.

15-166

v.

\*

SECTION:

SECT. 5 MAG. 2

DAVID MOREL

\*

VIOLATION: 18 U.S.C. § 2252(a)(4)(B)

18 U.S.C. § 2252(b)(2)

\*

18 U.S.C. § 2253

\* \* \*

The United States Attorney charges that:

**COUNT 1**

**POSSESSION OF CHILD PORNOGRAPHY**

Beginning at a time unknown, and continuing until on or about December 18, 2014, within the Eastern District of Louisiana and elsewhere, the defendant, **DAVID MOREL**, did knowingly possess one or more matters, that is electronic storage devices including PlayStation gaming devices containing digital videos and computer images that contained visual depictions that had been mailed, shipped, and transported in interstate and foreign commerce,

and that were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means including by computer, and the production of such visual depictions involved the use of a minor who was prepubescent and under the age of twelve (12)-years-old engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such visual depictions were of such conduct.

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

**NOTICE OF SENTENCE ENHANCEMENT**

Now comes the United States of America, by and through Kenneth Allen Polite, Jr., the United States Attorney for the Eastern District of Louisiana, to give notice that on or about September 30, 2010, the defendant, **DAVID MOREL**, was convicted of Pornography Involving Juveniles in violation of Louisiana Revised Statute 14.81.1, in the Criminal District Court for the Parish of Orleans, under Case No. 494125, Section "E." Because of this conviction, if the defendant is convicted for a violation of Title 18, United States Code, Section 2252(a)(4)(B), the defendant's sentence will be subject to a minimum sentence of imprisonment of not less than 10 years and a maximum sentence of not more than 20 years pursuant to Title 18, United States Code, Section 2252(b)(2).

**NOTICE OF FORFEITURE**

1. The allegations of Count One of this Bill of Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 2253.

2. As a result of the offense(s) alleged in Count One, defendant, **DAVID MOREL**, shall forfeit to the United States all property, real or personal, constituting or traceable to gross

profits or other proceeds obtained from such offenses; and/or any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2253, including but not limited to:

a. Sony Playstation gaming devices;

b. iPad.

3. If any of the property described above as being 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 person;

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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(o), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 2253.

KENNETH ALLEN POLITE, JR.  
UNITED STATES ATTORNEY



BRIAN M. KLEBBA  
Assistant United States Attorney  
New York Registration No. 2938728

New Orleans, Louisiana  
June 25, 2015