

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

2021 JUN 11 P 1:10
BY

CAROL L. MICHEL
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR RECEIPT AND POSSESSION OF
MATERIALS INVOLVING THE SEXUAL EXPLOITATION OF CHILDREN,
NOTICE OF SENTENCE ENHANCEMENT, AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

v.

DILLON J. EVERETT
a/k/a Dillon J. Everette

* CRIMINAL NO. **21-0074**
* SECTION: **SECT. DMAG. 3**
* VIOLATIONS: 18 U.S.C. § 2252(a)(2)
18 U.S.C. § 2252(b)(1)
18 U.S.C. § 2252(a)(4)(B)
18 U.S.C. § 2252(b)(2)
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The Grand Jury charges that:

COUNT ONE - RECEIPT OF CHILD PORNOGRAPHY

Beginning at a time unknown, and continuing until on or about December 2, 2020, in the Eastern District of Louisiana, and elsewhere, the defendant, **DILLON J. EVERETT, a/k/a Dillon J. Everette**, did knowingly receive, and attempt to receive, visual depictions, that is, digital images and videos and computer images and videos, that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer, the

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production of which involved the use of minors, 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)(2) and (b)(1).

COUNT TWO – POSSESSION OF CHILD PORNOGRAPHY

Beginning at a time unknown and continuing until on or about December 2, 2020, within the Eastern District of Louisiana, the defendant, **DILLON J. EVERETT**, did knowingly possess one or more matters, that is, computer media, 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, the production of which 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 the United States Attorney for the Eastern District of Louisiana, Duane A. Evans, who gives notice that on or about January 21, 2015, the defendant, **DILLON J. EVERETT**, was convicted in the 17th Judicial District Court for the Parish of Lafourche, State of Louisiana, of Possession of Pornography Involving Juveniles, in violation of Louisiana R.S. 14:81.1, Case Number 531400. Because of this conviction, if the defendant is convicted of a violation of Title 18, United States Code, Section 2252(a)(2) (Count 1), or Title 18, United States Code, Section 2252(a)(4)(B) (Count 2), the defendant's sentence will be subject to a maximum sentence of imprisonment of not more than forty (40) years and a

mandatory minimum sentence of fifteen (15) years as to Count 1 and a maximum sentence of imprisonment of not more than twenty (20) years and a mandatory minimum sentence of ten (10) years as to Count 2. *See* Title 18, United States Code, Sections 2252(b)(1) and 2252(b)(2).

NOTICE OF FORFEITURE

1. The allegations of Counts 1 and 2 of this Indictment are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America.

2. As a result of the offenses alleged in Counts 1 and 2, the defendant, **DILLON J. EVERETT**, shall forfeit to the United States all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and/or any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, in violation of Title 18, United States Code, Sections 2252(a)(2) and 2253, including but not limited to the following:

One (1) Samsung Galaxy Note 8, S/N R38JB07X5KM, IMEI 3536390925255938, model SM-N950U;

One (1) AT&T U304AA cell phone, IMEI 863382045217039;

One (1) Samsung Galaxy Note 3, S/N R31D90YGA1Y, IMEI 357572051230966, model SM-N900A.

3. If any of the above-described property, 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

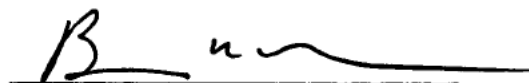
e. has been commingled with other property which cannot be subdivided without difficulty;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

A TRUE BILL:



DUANE A. EVANS
UNITED STATES ATTORNEY


BRIAN M. KLEBBA
Assistant United States Attorney

New Orleans, Louisiana
June 11, 2021