

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>TARIQ HAITHAM ALKHUDAYRI</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 2252(a)(2) (distribution of</b>
	<b>:</b>	<b>child pornography) (1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2252(a)(2) (receipt of child</b>
	<b>:</b>	<b>pornography) (1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2252(a)(4)(B) (possession of</b>
	<b>:</b>	<b>child pornography) (1 count)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about August 3, 2014 in Glen Mills, in the Eastern District of Pennsylvania,  
and elsewhere, defendant

**TARIQ HAITHAM ALKHUDAYRI**

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) and (b)(1).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about August 2, 2014, in Glen Mills, in the Eastern District of Pennsylvania,  
defendant

**TARIQ HAITHAM ALKHUDAYRI**

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 November 6, 2014, in Glen Mills, in the Eastern District of Pennsylvania, and elsewhere, defendant

#### **TARIQ HAITHAM ALKHUDAYRI**

knowingly possessed and knowingly accessed with intent to view, and attempted to possess a custom built desktop computer with a Seagate hard drive and an OCZ hard drive, a Maxtor hard drive, and a Fujitsu hard drive, 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

**TARIQ HAITHAM ALKHUDAYRI**

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 custom built laptop bearing serial number RC932KKN11093301692, containing a Seagate hard drive, bearing serial number S1DBJ8LH and an OCZ hard drive, bearing serial number 018131111001310.
2. One Maxtor hard drive, bearing serial number 6622181111105.
3. One Fujitsu hard drive, bearing serial number NWADT652BHF.

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

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY**