

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. 15-_____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
	<b>:</b>	<b>VIOLATIONS:</b>
<b>ANDREW F. DICKSON</b>	<b>:</b>	<b>18 U.S.C. § 2252(a)(4)(B)(access with intent to view child pornography – 2 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2252(a)(4)(B)(possession of child pornography – 2 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2252(a)(2)(receipt of child pornography – 1 count)</b>
	<b>:</b>	<b>Notice of Forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about February 21, 2015, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

**ANDREW F. DICKSON**

knowingly accessed a website with the intent to view child pornography, that is a visual depiction that involved the use of a minor engaging in sexually explicit conduct, which had been transported and shipped using a means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and the production of that visual depiction involved the use of a minor, engaging in sexually explicit conduct and the visual depiction was of such conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

**COUNT TWO**

**THE GRAND JURY CHARGES THAT:**

On or about March 2, 2015, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

**ANDREW F. DICKSON**

knowingly accessed a website with the intent to view child pornography, that is a visual depiction that involved the use of a minor engaging in sexually explicit conduct, which had been transported and shipped using a means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and the production of that visual depiction involved the use of a minor, engaging in sexually explicit conduct and the visual depiction was of such conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 17, 2015, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

**ANDREW F. DICKSON**

knowingly possessed a computer which contained child pornography, that is visual depictions that involved the use of minors engaging in sexually explicit conduct, which had been transported and shipped using a means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which were produced using materials which had been shipped and transported in interstate and foreign commerce. The production of these visual depictions involved the use of minors, including prepubescent minors and minors who had not attained 12 years of age, 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).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 9, 2015, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

**ANDREW F. DICKSON**

knowingly possessed a computer which contained child pornography, that is visual depictions that involved the use of minors engaging in sexually explicit conduct, that had been transported and shipped using a means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which were produced using materials which had been shipped and transported in interstate and foreign commerce. The production of these visual depictions involved the use of minors, including prepubescent minors and minors who had not attained 12 years of age, 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).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 19, 2013, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

**ANDREW F. DICKSON**

knowingly received a visual depiction that had been transported and shipped using a means of interstate commerce, that is the Internet, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct.

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

## **NOTICE OF FORFEITURE**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 2252(a)(2) and 2252(a)(4), as set forth in this indictment, defendant

### **ANDREW F. DICKSON**

shall forfeit to the United States of America:

(a) any visual depiction, or any film, videotape, or other matter which contains any child pornography, which was produced, transported, mailed, shipped, or received as a result of such violations as charged in the indictment;

(b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violations; and

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violations including, but not limited to, items seized from the person and house of Andrew F. Dickson as follows:

- i. Samsung Cell Phone, S/N RZ8F80X2CVR
- ii. Samsung Tablet S/N R22DC04XESB
- iii. SimpleTech 320 GB External Hard Drive, S/N  
07135480320309335
- iv. Black Computer Tower, no serial number
- v. LG LG-V496 Tablet, IMEI 359211061624862
- vi. Sandisk 256 MB SD Card

- vii. Approximately 360 CD-Roms/DVDs and 1 Floppy disk
- viii. Cruzer Glide 64 GB Thumb drive S/N VN131123461b
- ix. Toshiba External Hard Drive S/N 14HCT57DTIFB
- x. Western Digital 500 GB Hard Drive, S/N WCAV98946555
- xi. Lexar 16 GB Thumb drive 34044-16GNA
- xii. Compaq Sticker/Western Digital External Hard drive 60 GB S/N  
WM9680027309
- xiii. Western Digital External Hard Drive 60 GB S/N  
WMA8F2698400
- xiv. Sandisk Cruzer 4GB SDCZ36-004G
- xv. HTC Cell Phone T-Mobile, no serial number available

2. If any of the property 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 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;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

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



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