

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 15-**
v. : **DATE FILED: _____, 2015**
WILLIAM KELLER III : **VIOLATIONS:**
: **18 U.S.C. § 2252(a)(2) (receipt of child**
: **pornography – 5 counts)**
: **18 U.S.C. § 2252(a)(4)(B) (possession of child**
: **pornography – 1 count)**
: **Notice of Forfeiture**

INDICTMENT

COUNTS ONE THROUGH FIVE

THE GRAND JURY CHARGES THAT:

On or about each of the dates listed below, each date constituting a separate count of this Indictment, in the Eastern District of Pennsylvania and elsewhere, defendant

WILLIAM KELLER III

knowingly received visual depictions, that is, computer files containing such visual depictions, using a means and facility of interstate commerce, that is, the Internet, and 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.

<u>COUNT</u>	<u>DATE</u>	<u>IMAGE</u>
ONE	May 6, 2010	Lsm16-02-04.mpg
TWO	August 3, 2011	Naughty Little Pretty Girls preteen ptn pthc ptsc lsm0037.jpg

THREE	April 25, 2012	Imgsr Ru Pthc Pedo Babyshivid Childlover Private Daughter Torpedo Ranchi Lolita – 1188370141121.jpg
FOUR	May 16, 2012	12985769280_onionib.jpg
FIVE	September 28, 2012	Ela 9 Yo Embarrassed.mpg

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2012, in the Eastern District of Pennsylvania, defendant

WILLIAM KELLER III

knowingly possessed certain matter, namely a computer and an external hard drive, which contained visual depictions that had been shipped and transported using a means and facility of interstate and foreign commerce, that is, the Internet, and in and affecting 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).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 2252, set forth in this indictment, defendant

WILLIAM KELLER III

shall forfeit to the United States of America any visual depiction described in Section 2252 and any matter containing such depictions, and any property used or intended to be used to commit or promote the commission of the offenses, including, but not limited to:

Dell Dimension E521 Computer, S/T 87651D1

iOmega External Hard Drive, Model 1DHD-UP2, Serial No. WJA0320197

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

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

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

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney