

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** 15-_____
v. : **DATE FILED:** _____
RICHARD SCHULTZ : **VIOLATION:**
: **18 U.S.C. § 2252(a)(4)(B) (possession of**
: **child pornography - 1 count)**
: **Notice of forfeiture**

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

From on or about July 2, 2015 in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

RICHARD SCHULTZ

knowingly possessed laptop computers, an iPhone, and a computer hard drive which contained more than 600 visual depictions of minors, including depictions of prepubescent minors and minors who had not attained 12 years of age, that had been shipped and transported using a means and facility of interstate and foreign commerce and in 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 UNITED STATES ATTORNEY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 2252(a)(4)(B), set forth in this information, defendant

RICHARD SCHULTZ

shall forfeit to the United States of America visual depictions described in the above section, and any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation, including, but not limited to:

1. one Acer Laptop computer, serial number LXPGX0200594741B2F1601;
2. one Compaq Presario Laptop computer, serial number IV06FL47N8AC;
3. one Gateway 2000 Tower computer, serial number 0008599023; and
4. one Apple iPhone with black Buddibox case, serial number 013850006725918

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

ZANE DAVID MEMEGER
United States Attorney