

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

UNITED STATES OF AMERICA : CRIMINAL NO. 16-
v. : DATE FILED: _____
DANIEL MATTSON : VIOLATIONS:
ANTHONY LEMBO : 18 U.S.C. § 2252(a)(2) (distribution of
child pornography - 14 counts)
: 18 U.S.C. § 2252(a)(2) (receipt of child
pornography - 19 counts)
: 18 U.S.C. § 2252(a)(4) (possession of child
pornography – 2 counts)
: Notice of forfeiture

INDICTMENT

COUNTS ONE THROUGH SEVEN

THE GRAND JURY CHARGES THAT:

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

DANIEL MATTSON

knowingly distributed visual depictions to ANTHONY LEMBO that had been shipped using a
means and facility of interstate and foreign commerce, which visual depictions showed minors
under the age of 18 years engaged in sexually explicit conduct and the producing of those visual
depictions involved the use of minors under the age of 18 years engaged in sexually explicit
conduct.

Count	Date	Subject
1	November 13, 2009	Not Much
2	January 5, 2010	Who likes cock?
3	February 10, 2011	What u got?
4	August 18, 2012	Jerk it some more

5	July 16, 2013	Happy Birthday!
6	July 24, 2014	Old classics
7	February 13, 2015	Where you been?

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

COUNTS EIGHT THROUGH FOURTEEN

THE GRAND JURY CHARGES THAT:

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

ANTHONY LEMBO

knowingly received visual depictions from DANIEL MATTSON that had been shipped using a means and facility of interstate and foreign commerce, which visual depictions showed minors under the age of 18 years engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors under the age of 18 years engaged in sexually explicit conduct.

Count	Date	Subject
8	November 13, 2009	Not Much
9	January 5, 2010	Who likes cock?
10	February 10, 2011	What u got?
11	August 18, 2012	Jerk it some more
12	July 16, 2013	Happy Birthday!
13	July 24, 2014	Old classics
14	February 13, 2015	Where you been?

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

COUNTS FIFTEEN THROUGH TWENTY ONE

THE GRAND JURY FURTHER CHARGES THAT:

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

ANTHONY LEMBO

knowingly distributed visual depictions to DANIEL MATTSON that had been shipped using a means and facility of interstate and foreign commerce, which visual depictions showed minors under the age of 18 years engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors under the age of 18 years engaged in sexually explicit conduct.

Count	Date	Subject
15	August 20, 2009	Re:
16	January 6, 2010	Re: Running low
17	November 11, 2010	If you spank it you will cum
18	November 20, 2010	Let me know what you think
19	October 21, 2011	When can I blow you
20	October 23, 2012	I love cock
21	March 31, 2015	Whats happening?

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

COUNTS TWENTY-TWO THROUGH TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

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

DANIEL MATTSON

knowingly received visual depictions from ANTHONY LEMBO that had been shipped using a means and facility of interstate and foreign commerce, which visual depictions showed minors under the age of 18 years engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors under the age of 18 years engaged in sexually explicit conduct.

Count	Date	Subject
22	August 20, 2009	Re:
23	January 6, 2010	Re: Running low
24	November 11, 2010	If you spank it you will cum
25	November 20, 2010	Let me know what you think
26	October 21, 2011	When can I blow you
27	October 23, 2012	I love cock
28	March 31, 2015	Whats happening?

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

COUNTS TWENTY-NINE THROUGH THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

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

ANTHONY LEMBO

knowingly received visual depictions that had been shipped using a means and facility of interstate and foreign commerce, which visual depictions showed minors under the age of 18 years engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors under the age of 18 years engaged in sexually explicit conduct.

Count	Date	Subject
29	July 16, 2011	Trade?
30	July 21, 2011	Trade?
31	September 14, 2011	Trade?
32	October 3, 2011	Trade?
33	October 22, 2011	Trade

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

COUNT THIRTY-FOUR

THE GRAND JURORS FURTHER CHARGE THAT:

On or about October 15, 2015, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

DANIEL MATTSON

knowingly possessed books, magazines, periodicals, films, video tapes and other matter, namely a laptop computer, a cellular telephone, and email accounts, which contained visual depictions that had been 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 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 THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 25, 2015, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

ANTHONY LEMBO

knowingly possessed books, magazines, periodicals, films, video tapes and other matter, namely a laptop computer, a hard drive, a cellular telephone, a desktop computer, a flash drive, and email accounts, which contained visual depictions that had been 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 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:

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

**DANIEL MATTSON, and
ANTHONY LEMBO**


shall forfeit to the United States of America:

- (a) any visual depiction described in section 2252, or any film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received as a result of such violation;
- (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violation;
- (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violation; and
- (d) 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 2252(a)(2), and 2252(a)(4)(B), including, but not limited to:
 - i. Dell Inspiron laptop, Model N5010, serial number HKH02N1;
 - ii. Apple iPhone 3G, Model A1241, IMEI 011772004079423;
 - iii. One Hewlitt Packard laptop computer, serial number 2CE2120QXT;
 - iv. One Western Digital hard drive, serial number WX31A3464644;
 - v. One Samsung Galaxy Note3 cellphone, Model SM-N900P;
 - vi. One Dell XPS desktop computer, serial number 607P661; and
 - vii. One PYN 64GB Sand disk flash drive.

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

A TRUE BILL:

GRAND JURY FOREPERSON


ZANE DAVID MEMEGER
United States Attorney