

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

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| UNITED STATES OF AMERICA | : | CRIMINAL NO. 16- |
| v. | : | DATE FILED: May 12, 2016 |
| RUBEN COTTO, JR. | : | VIOLATIONS: |
| | : | 18 U.S.C. § 2251(a) & (e) (production of |
| | : | child pornography – 1 count) |
| | : | 18 U.S.C. § 2252(a)(2) (distribution |
| | : | of child pornography - 1 count) |
| | : | 18 U.S.C. § 2252(a)(4) (possession of child |
| | : | pornography - 1 count) |
| | | Notice of forfeiture |

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about April 25, 2016, in Lehigh County, in the Eastern District of Pennsylvania, and elsewhere, defendant

RUBEN COTTO, JR.,

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct and knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 25, 2016, in Lehigh County, in the Eastern District of Pennsylvania, and elsewhere, defendant

RUBEN COTTO, JR.,

knowingly distributed visual depictions, using a means and facility of interstate and foreign commerce, that is, the Internet, and which visual depictions had been shipped and transported in and affecting interstate and foreign commerce, and which visual depictions contained materials which had been mailed and so shipped and transported, and the producing of such visual depictions involved the use of minors engaging in sexually explicit conduct, and the visual depictions were of such conduct, and aided and abetted the same.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 25, 2016, in Lehigh County, in the Eastern District of Pennsylvania, defendant

RUBEN COTTO, JR.,

knowingly possessed a mobile device which contained visual depictions that had been 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 a minor, including a prepubescent minor 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).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Section 2251 and 2252, set forth in this indictment, defendant

RUBEN COTTO, JR.,

shall forfeit to the United States of America any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, including, but not limited to an Apple iPhone bearing social security number F2MNTV0VG5QH.

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

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney