

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 16-
v.	:	DATE FILED: May 26, 2016
THOMAS CHRISTIAN RAMBO	:	VIOLATIONS:
	:	18 U.S.C. § 2252(a)(4)(B) (access with intent to
		view child pornography – 5 counts)
		Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about May 31, 2015, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

THOMAS CHRISTIAN RAMBO

knowingly accessed with intent to view certain matter, namely an internet website and page which contained a visual depiction that had been shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. The production of this visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of a minor engaging in sexually explicit conduct. This visual depiction involved in this offense involved a prepubescent minor and a minor who had not attained 12 years of age.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 1, 2015, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

THOMAS CHRISTIAN RAMBO

knowingly accessed with intent to view certain matter, namely an internet website and page which contained a visual depiction that had been shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. The production of this visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of a minor engaging in sexually explicit conduct. This visual depiction involved in this offense involved a prepubescent minor and a minor who had not attained 12 years of age.

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 10, 2015, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

THOMAS CHRISTIAN RAMBO

knowingly accessed with intent to view certain matter, namely an internet website and page which contained a visual depiction that had been shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. The production of this visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of a minor engaging in sexually explicit conduct. This visual depiction involved in this offense involved a prepubescent minor and a minor who had not attained 12 years of age.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 28, 2015, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

THOMAS CHRISTIAN RAMBO

knowingly accessed with intent to view certain matter, namely an internet website and page which contained a visual depiction that had been shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. The production of this visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of a minor engaging in sexually explicit conduct. This visual depiction involved in this offense involved a prepubescent minor and a minor who had not attained 12 years of age.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 29, 2015, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

THOMAS CHRISTIAN RAMBO

knowingly accessed with intent to view certain matter, namely an internet website and page which contained a visual depiction that had been shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce. The production of this visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of a minor engaging in sexually explicit conduct. This visual depiction involved in this offense involved a prepubescent minor and a minor who had not attained 12 years of age.

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

THOMAS CHRISTIAN RAMBO

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:

- 1) Lenovo H500S desktop computer, serial number ES13149552;
- 2) Dell Inspiron 530 desktop computer, serial number 00146-525-337-219;
- 3) Compaq Presario desktop computer, serial number MXK4130YXD.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

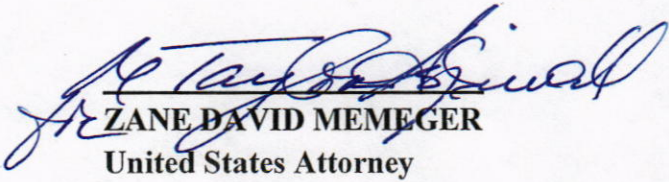
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot 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