

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

10:00 AM PH 1:41

U.S. DISTRICT COURT
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

CHARLES POOLE

CASE NO.

8:2020 cr 190 T35 AAS

18 U.S.C. § 2251(a)

18 U.S.C. § 2252(a)(2)

18 U.S.C. § 2252(a)(4)(B)

INDICTMENT

The Grand Jury charges:

COUNT ONE

On an unknown date but starting at least in or around August 2017 and continuing through and including in or around August 2018, in the Middle District of Florida, and elsewhere, the defendant,

CHARLES POOLE,

did employ, use, persuade, induce, entice, and coerce a minor, to engage in any sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of 18 U.S.C. § 2251(a) and (e).

COUNT TWO

On or about October 8, 2019, in the Middle District of Florida, and elsewhere, the defendant,

CHARLES POOLE,

did knowingly receive, and attempt to receive, a visual depiction that contained materials that had been shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, when the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction was of such conduct.

In violation of 18 U.S.C. § 2252(a)(2) and (b)(1).

COUNT THREE

On or about November 1, 2019, in the Middle District of Florida, and elsewhere, the defendant,

CHARLES POOLE,

did knowingly receive, and attempt to receive, a visual depiction that contained materials that had been shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, when the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and the visual depiction was of such conduct.

In violation of 18 U.S.C. § 2252(a)(2) and (b)(1).

COUNT FOUR

On or about April 29, 2020, in the Middle District of Florida, and elsewhere, the defendant,

CHARLES POOLE,

did knowingly possess a matter which contained a visual depiction that had been shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, produced using materials which had been shipped and transported using any means and facility of interstate and foreign commerce including by computer, and produced using materials that had been shipped and transported in and affecting interstate and foreign commerce, when the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct and the depiction involved a prepubescent minor and a minor who had not attained 12 years of age.

In violation of 18 U.S.C. § 2252(a)(4)(B) and (b)(2).

FORFEITURE

1. The allegations contained in Counts One, Two, Three and Four are incorporated by reference for the purpose of alleging forfeiture, pursuant to the provisions of 18 U.S.C. § 2253.

2. Upon conviction of a violation of 18 U.S.C. §§ 2251, 2252(a)(2) or (a)(4)(b), the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 2253:

a. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B, or 2260 of chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of chapter 110;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

3. The property to be forfeited includes, but is not limited to, the following: a Motorola, Model No. XT1921-3 (IMEI 354159103140782) and a Samsung, Model No. SM-J327T1 (IMEI 355417099376672).

4. If any of the property described above, as a result of any act or omission of the defendant:

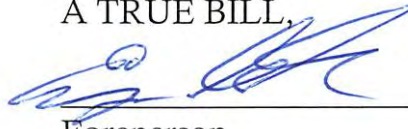
a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

- 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 subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).

A TRUE BILL,



Foreperson

MARIA CHAPA LOPEZ
United States Attorney

By:



Candace Rich
Assistant United States Attorney

By:



Carlton Gammons
Assistant United States Attorney
Acting Chief, Special Victims Section

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

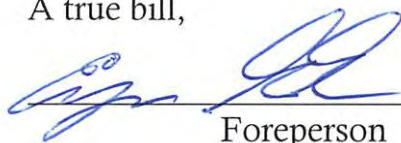
vs.

CHARLES POOLE

INDICTMENT

Violations: 18 U.S.C. § 2251(a)
18 U.S.C. § 2252(a)(2)
18 U.S.C. § 2252(a)(4)(B)

A true bill,


Foreperson

Filed in open court this 11th day
of June, 2020.

Clerk

Bail \$ _____
