

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Criminal No. 23-  
 :  
 v. :  
 : 18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)  
 DANIEL BALDWIN :  
 :

**INFORMATION**

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

On or about February 23, 2022, in Burlington County, in the District of New Jersey, and elsewhere, defendant

DANIEL BALDWIN

did knowingly possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that had been mailed and shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, including by computer, and that was produced using materials that have been mailed and shipped and transported in and affecting interstate and foreign commerce, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

**FORFEITURE ALLEGATION**

1. The United States hereby gives notice that upon the conviction of the defendant DANIEL BALDWIN of the offense in violation 18 U.S.C. § 2252A(a)(5)(B) and (b)(2), as charged in this Information, the United States will seek forfeiture, in accordance with 18 U.S.C. § 2253, of all right, title and interest of the defendant in the following:

(a) any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, 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 Title 18, United States Code,

Chapter 110;

(b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense charged in this Information; and

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses,

and all property traceable to such property.

2. The property subject to forfeiture includes, but is not limited to, the following property seized from the defendant's prison cell on or about February 23, 2022:

a. One (1) Samsung EVO 32 GB SD card containing markings

“MBMEBGVEGAAW-T” and “KNDAVDRAF749;”

- b. One (1) AT&T SIM card, bearing number 89014103271890737586;  
and
- c. One (1) Sprint SIM card, bearing number  
89011203002542737079.

**Substitute Assets Provision**

3. If any of the above-described forfeitable property, 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;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253, to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.



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PHILIP R. SELLINGER  
United States Attorney

**CASE NUMBER:**

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**DANIEL BALDWIN**

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**INFORMATION FOR**

**18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)**

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PHILIP R. SELLINGER  
UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY

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DANIEL A. FRIEDMAN  
ASSISTANT U.S. ATTORNEY  
CAMDEN, NEW JERSEY  
(856) 757-5026

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