

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 16-
	:	
DONALD HARING	:	18 U.S.C. § 2252A(a)(2)(A)
	:	18 U.S.C. § 2252A(a)(5)(B)
	:	18 U.S.C. § 2252A(b)(1)-(2)

I N F O R M A T I O N

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

COUNT ONE
(Distribution of Child Pornography)

From on or about June 18, 2014 through on or about October 19, 2014, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

DONALD HARING,

did knowingly distribute and attempt to distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), which had been mailed, and using any means and facility of interstate and foreign commerce, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(b)(1).

COUNT TWO
(Possession of Child Pornography)

On or about December 12, 2014, in Monmouth County, in the District of New Jersey, and elsewhere, the defendant,

DONALD HARING,

did knowingly possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and which was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

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

FORFEITURE ALLEGATIONS

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a).

2. Upon conviction of the offenses set forth in this Information, in violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(a)(5)(B), the defendant,

DONALD HARING,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, all of his right, title, and interest in the following:

- a. Any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, or 2252A, 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; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

The property to be forfeited includes, but is not limited to, the following, which was seized from the defendant's residence on or about December 12, 2014:

- a. Sytemax desktop, serial number 106137801, containing a Western

Digital WD3200AAKS hard disk drive, bearing serial number WMAWF1828933;

- b. Toshiba 500 GB external hard drive HDDR500E03X, bearing serial number 69B1F1XUSF55; and
- c. Western Digital 250 GB external hard drive WD2500JB, bearing serial number WCANKE709790.

3. 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 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 without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).



PAUL J. FISHMAN
United States Attorney

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v.

DONALD HARING

INFORMATION FOR

18 U.S.C. § 2252A(a)(2)(A)
18 U.S.C. § 2252A(a)(5)(B)
18 U.S.C. § 2252A(b)(1)-(2)

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