

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 25-
	:	
MICHAEL HAMILTON	:	18 U.S.C. §§ 2251(a) and 2251(e)

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:

On a date in or before 2018, in the District of New Jersey and elsewhere, the defendant,

MICHAEL HAMILTON,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, that is, Minor Victim-1, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction and transmitting a live visual depiction of such conduct knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, including by computer and the internet.

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

FORFEITURE ALLEGATION

Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offense charged in this Information, the defendant, MICHAEL HAMILTON, shall forfeit to the United States all right, title and interest in the following:

(a) any visual depictions described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, and 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, 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 offense charged in this Information and any property traceable to such property.

3. The property to be forfeited includes, but is not limited to, the following property seized from the defendant on or about October 13, 2023:

(a) One Cruzer black 4GB Thumb Drive;

(b) One Verbatim blue Thumb Drive;

(c) One Verbatim Tie Dye 16GB thumb drive;

(d) One Apple computer, Serial Number C07JX9S5DWYL;

(e) One Gray MacBook, model A1286, FCC ID QDS-BRCM103;

(f) One Black iPhone, model A1387, FCC ID BCG-E2430A;

- (g) One Gray iPhone, cracked screen, model A1586, IMEI
356979064702157;
- (h) One Gray iPhone, model MLKL3LL/A;
- (i) One Black and gray iPad, 16GB, model A1475, Serial Number
DMQLWD4FF4YD;
- (j) One Black iPhone, 16GB, model A1241;
- (k) One iPad with red case, iPad white in color, model A1395, Serial
Number DYTJKHJ7DKFH;
- (l) One Black Apple wristwatch, Model A2354;
- (m) One Green, blue, and brown Arrow Collar Shirt, size XL.

SUBSTITUTE ASSETS PROVISION

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 Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253, to seek forfeiture of any other property of the defendant up to the value of the above described forfeitable property.



ALINA HABBA
United States Attorney