

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 24-
	:	
RUSSELL LYNN DAVIS, JR.	:	18 U.S.C. § 2251(a)
	:	18 U.S.C. § 2251(e)
	:	18 U.S.C. § 2252A(a)(2)(A)
	:	18 U.S.C. § 2

I N D I C T M E N T

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges:

COUNT ONE
(Conspiracy to Commit Sexual Exploitation of Children)

From in or around June 2021 through on or about August 16, 2021, in
the District of New Jersey and elsewhere, the defendant,

RUSSELL LYNN DAVIS, JR.,

did conspire and agree with another to knowingly employ, use, persuade, induce,
entice and coerce, Victim 1, a prepubescent minor, to engage in sexually explicit
conduct, as defined in Title 18, United States Code, Section 2256(2), for the
purpose of producing visual depictions of such conduct, knowing that such
visual depictions would be transported and transmitted using a means and
facility of interstate and foreign commerce, namely, the Internet, and which
visual depictions were 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, and which visual depictions
had actually been transported and transmitted using any means and facility of

interstate and foreign commerce and in and affecting interstate and foreign commerce, contrary to Title 18, United States Code, Section 2251(a).

In violation of Title 18, United States Code, Section 2251(e).

COUNT TWO
(Sexual Exploitation of Children)

On or about August 16, 2021, in the District of New Jersey and elsewhere,
the defendant,

RUSSELL LYNN DAVIS, JR.,

did knowingly employ, use, persuade, induce, entice and coerce Victim 1, a prepubescent minor, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, knowing that such visual depictions would be transported and transmitted using a means and facility of interstate and foreign commerce, namely, the Internet, and which visual depictions were 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, and which visual depictions had actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and did attempt to do the same.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e) and Section 2.

COUNT THREE
(Receipt of Child Pornography)

From in or around June 27, 2021 through on or about August 29, 2021,
in the District of New Jersey and elsewhere, the defendant,

RUSSELL LYNN DAVIS, JR.,

knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8), that 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, Section 2252A(a)(2)(A) and Section 2.

FORFEITURE ALLEGATION

The United States hereby gives notice that upon conviction of the violations of Title 18, United States Code, Sections 2251 and 2252A, as charged in this Indictment, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 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, Chapters 109A and 110;
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in this Indictment, and all property traceable to such property; and
- c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, and all property traceable to such property.

Substitute Assets Provision

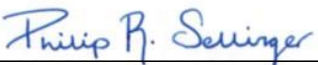
If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- 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 forfeitable property listed above.

A TRUE BILL

FOREPERSON



PHILIP R. SELLINGER
United States Attorney