RECEIVED

USAO #2017R428/DAW

MAR 26 2018

AT 8:30 _____ M
WILLIAM T. WALSH, CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : HON.
                          :
                          : Criminal No. 18-148-MCA
        v.   :
                          :
SAM CYNAMON   : 18 U.S.C. §§ 2252A(a)(5)(B) and (b)(1)
                          :

INDICTMENT

The Grand Jury in and for the District of New Jersey,

sitting at Newark, charges:

COUNT ONE

(Possession of Child Pornography)

1.   On or about July 10, 2017, in the District of New Jersey,

and elsewhere, the defendant,

SAM CYNAMON,

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 images 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 were produced using materials

that were shipped and transported in and affecting interstate and

foreign commerce, by any means, including by computer, after having

been convicted in the District of New Jersey of possession of child

pornography, in violation of Title 18, United States Code, Section

2252(a)(5)(B).

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATION

1.   The United States hereby gives notice that upon the conviction of the defendant SAM CYNAMON of the offense in violation of 18 U.S.C. § 2252A charged in Count One of this Indictment, 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 18 U.S.C. §§ 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 18 U.S.C. Part I, Chapter 110;

(b)   any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense charged in Count Two of 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 offense,

2

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 residence on or about July 10, 2017:

(a)   One Acer Aspire E 15 laptop, serial number NXGHGAA00164526AAA7600;

(b)   One Lenovo ThinkCentre M83 computer, serial number MJ03BNJT;

(c)   Hitachi 320GB Hard Drive, serial number 11S42T1104Z1ZF6E0046JH;

(d)   Seagate 250GB Hard Drive, serial number 5RG61DC6;

(e)   Toshiba 1TB external Hard Drive, serial number Z33YSFU6STT1; and

(f)   SanDisk Micro Cruzer 2GB thumb drive, serial number BE0801JLMB,

and all property traceable to such property.

Substitute Assets Provision

2.   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.

A TRUE BILL

FOREPERSON

CRAIG CARPENITO
United States Attorney

4

CASE NUMBER: _18-cr-148-Map_

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

SAM CYNAMON

INDICTMENT FOR

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

A True Bill,

roreperson

CRAIG CARPENITO
UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

DANIELLE ALFONZO WALSMAN
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
973-645-2700