

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : HON.  
 :  
 v. : Criminal No. 18-  
 :  
 RASHAD RUSSELL : 18 U.S.C. § 2252A(a) (2)  
 :

INDICTMENT

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

COUNT ONE

(Distribution of Child Pornography)

1. On or about January 8, 2018, in the District of New  
Jersey, and elsewhere, the defendant,

RASHAD RUSSELL,

did knowingly 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, Section  
2252A(a) (2).

FORFEITURE ALLEGATION

1. The United States hereby gives notice that upon the conviction of the defendant RASHAD RUSSELL 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 One 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,
- 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 March 13, 2018:

- (a) An ASUS Laptop, Model K501,  
Unique ID: DZ 13GNVK12P031-C 6;
- (b) An LG Phone, Serial No. 609VTLZ0436128;
- (c) An LG Phone, Serial No. 610CQBD0604917;
- (d) An Alcatel OneTouch Phone, Unique ID: A564C-  
2AKFUS1-R1;
- (e) A ZTE Phone, Model Z899VL, Serial No.  
32FB76412755;
- (f) A Samsung MP3 Player, Model S6H-T599N; and
- (g) A Cruzer Glide 32 GB Flash Drive, Model SDCZ60-  
032G;

and all property traceable to such property.

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.

A TRUE BILL



FOREPERSON

  
CRAIG CARPENITO  
United States Attorney