

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

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 19-
	:	
TODD WALSH	:	18 U.S.C. § 2252A(a)(2)(A)

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 or about February 9, 2017 in Hudson County, in the District of New Jersey and elsewhere, the defendant,

TODD WALSH,

did knowingly distribute 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, Sections 2252A(a)(2)(A), 2252A(b)(1), and 2.

FORFEITURE ALLEGATION

1. As a result of committing the distribution of child pornography offense charged in this Information, in violation of Title 18, United States Code, Section 2252A(a)(2), the defendant, Todd Walsh, pursuant to Title 18, United States Code, Section 2253, shall forfeit to the United States of America (a) all 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 109A; (b) all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in this Indictment; and (c) all property, real and personal, used or intended to be used to commit or to promote the commission of the offenses charged in this Indictment and all property traceable to such property.

2. The property to be forfeited includes, but is not limited to, the following property seized from the defendant on or about October 17, 2018:

- a. Western Digital hard drive, Serial No. wx61a648b4t2;
- b. Western Digital hard drive, Serial No. wxn1ea52k3uc;
- c. Western Digital external hard drive, Serial No. wxx1ec3cutjd;
- d. Hitachi hard drive, Serial No. 2z694-5456;
- e. Hitachi hard drive, Serial No. 0a57325;
- f. Seagate hard drive, Serial No. WDe32ppc;
- g. Samsung hard drive, Serial No. 52tpj9ac629768;

- h. Toshiba SS drive, Serial No. t0ug1xbg;
- i. Thumb drive (black)
- j. Flash drive (black);
- k. Sandisk (32 GB) thumb drive;
- l. Gigastone thumb drive (16 GB);
- m. iPhone (red);
- n. Macbook Air, Serial No. fvf519vlh3qf;
- o. Lenovo laptop, Serial No. vd03ybya;
- p. Toshiba laptop, Serial No. 5f0281794;
- q. Asus laptop, Serial No e4n0bc642156143;
- r. Lenovo laptop, Serial No. yd01qjx2;
- s. HP laptop, Serial No. cnd7074r57;
- t. Dell laptop, Serial No. gjh9v91;
- u. iPhone (white);
- v. iPad mini (black), Serial No. f4kjn0j3f194;
- w. iPad mini (white), Serial No. f7nmx35mf19m;
- x. iPad (black), Serial No. dlxh8634dngt;
- y. iPad (black), Serial No. dmplc02vf18c;
- z. Gray and orange device case with cords;
- aa. Thumb drives (9);
- bb. Toshiba SSD hard drive, Serial No. 64ts10hktbzw;
- cc. Western Digital hard drive, Serial No. wx51a67pucjj;
- dd. Thumb drives (3);

- ee. Buckle thumb drives;
- ff. Toshiba hard drive, Serial No. 50f9p193t1b3;
- gg. HGST hard drive, Serial No. gyo2455h; and
- hh. iPhone (black).

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).

CRAIG CARPENITO
United States Attorney