

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Crim. No. 19-
	:	
v.	:	18 U.S.C. § 2252A(a)(2)(A)
	:	18 U.S.C. § 2252A(b)(1)
MICHAEL A. RUGGIERO	:	18 U.S.C. § 2

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

Between on or about April 16, 2016 and on or about April 19, 2016, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

MICHAEL A. RUGGIERO,

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, Sections 2252A(a)(2)(A) and 2252A(b)(1), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

1. The United States hereby gives notice that upon the conviction of the defendant MICHAEL A. RUGGIERO of the offense in violation of 18 U.S.C. § 2252A(a)(2)(A) charged in this Information, 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 this Information, 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 to be forfeited includes, but is not limited to, all of the defendant's right, title, and interest in the following items seized from the defendant's residence on or about June 5, 2017:

One Samsung Galaxy S7 Edge, Model SM-G935V, IMEI # 358166072389288.

Substitute Assets Provision

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,

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 forfeitable property listed above.



CRAIG CARPENITO
United States Attorney

CASE NUMBER: 19-cr-

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UNITED STATES OF AMERICA

v.

MICHAEL A. RUGGIERO

INFORMATION FOR

18 U.S.C. § 2252A(a)(2)(A),
18 U.S.C. § 2252A(b)(1),
18 U.S.C. § 2

CRAIG CARPENITO

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