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filed 11/12/2020

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**NOV 12 2020**

UNITED STATES OF AMERICA

:

Crim. No. 20- 996 (FLW)

AT 8:30 \_\_\_\_\_ M  
WILLIAM T. WALSH CLERK

v.

:

18 U.S.C. § 2252A(a)(2)(A) & (b)(1)

STEPHEN TISCH

:

18 U.S.C. § 2252A(a)(5)(B) & (b)(2)

:

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 Trenton,  
charges:

COUNT ONE

(Distribution of Child Pornography)

Between on or about January 17, 2016 and on or about March 13, 2016,  
in Ocean County, in the District of New Jersey and elsewhere, the defendant,

STEPHEN TISCH,

did knowingly distribute child pornography, as defined in Title 18, United  
States Code, Section 2256(8), using any means and facility of interstate and  
foreign commerce and that had been mailed, and had been shipped and  
transported in and affecting interstate and foreign commerce by any means,  
including by computer, after having been convicted in the Superior Court of  
New Jersey, Ocean County, of endangering the welfare of a child/possession of  
child pornography, in violation of N.J.S.A. 2C:24-4B(5)(b).

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

COUNT TWO  
(Possession of Child Pornography)

On or about August 11, 2016, in Ocean County, in the District of New Jersey and elsewhere, the defendant,

STEPHEN TISCH,

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 mailed, shipped, and transported in and affecting interstate and foreign commerce, by any means, including by computer, after having been convicted in the Superior Court of New Jersey, Ocean County, of endangering the welfare of a child/possession of child pornography, in violation of N.J.S.A. 2C:24-4B(5)(b).

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

1. The allegations contained in Counts One and Two of this Indictment hereby are realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a).

2. Upon conviction of either or both of the offenses charged in Counts One and Two of this Indictment, the defendant,

STEPHEN TISCH,

shall forfeit to the United States of America all of his right, title, and interest 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, and all property traceable to such property.

3. The property to be forfeited includes, but is not limited to, all of the defendant's right, title, and interest in the following items:


- (a) One (1) Samsung SM-S902L Galaxy S5 cell phone, IMEI number 990005823273256; and
- (b) One (1) LG LGL31L cell phone, IMEI number 014037-00-193150-6, serial number 411CYSF193150.

**Substitute Assets Provision**

4. 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 above forfeitable property.



*Craig Carpenito*

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CRAIG CARPENITO  
United States Attorney

**CASE NUMBER:** 20-996 (FLW)

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**STEPHEN TISCH**

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**INDICTMENT FOR**

**18 U.S.C. § 2252A(a)(2)(A) and (b)(1)  
18 U.S.C. § 2252A(5)(B) and (b)(2)  
18 U.S.C. § 2**

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**CRAIG CARPENITO  
UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY**

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**MICHELLE S. GASPARIAN  
KATIE MAGEE LEE  
ASSISTANT U.S. ATTORNEYS  
TRENTON, NEW JERSEY  
(609) 656-2558**

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