

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. John Michael Vazquez,
	:	U.S.D.J.
v.	:	
	:	Crim. No. 20-597 (JMV)
JOHN E. SCHULENBURG	:	
	:	18 U.S.C. § 2252A(a)(5)

SUPERSEDING INFORMATION

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

On or about November 6, 2019, in Somerset County, in the District of New Jersey, and elsewhere, the defendant,

JOHN E. SCHULENBURG,

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 or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that were produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, after having previously been convicted, in New Jersey Superior Court, of endangering the welfare of a child/possession of child pornography, in violation of N.J.S.A. 2C:24-4b.

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

FORFEITURE ALLEGATION

1. The allegations set forth above are realleged and incorporated herein by reference.

2. Upon conviction of the violation of 18 U.S.C. § 2252A charged in this Superseding Information, the defendant,

JOHN E. SCHULENBURG,

shall forfeit to the United States, pursuant to 18 U.S.C. § 2253, 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 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.

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

- (a) PNY 32GB USB Thumb Drive;
- (b) Sandisk Cruzer Glide 128GB USB Thumb Drive;
- (c) "Diabetes Relief Center" USB Thumb Drive;
- (d) Western Digital My Passport Ultra External Hard Drive, s/n WX41E44RDC21;
- (e) Simpletech 250GB Portable Hard Drive, BOM# 96200-41001-056;

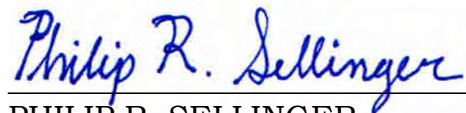
- (f) Google Pixel 2XL;
- (g) Transcend USB Thumb Drive;
- (h) Sandisk Cruzer Edge USB Thumb Drive;
- (i) Simpletech 250GB Portable Hard Drive, BOM# 96200-41001-054;
- (j) Motorola Verizon Phone, Model XT912;
- (k) Motorola Verizon Droid Phone;
- (l) Lenovo Laptop, Model 81BH, s/n PF0TJ003; and
- (m) Apple iPad, Model A1566.

Substitute Assets Provision

4. 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.



PHILIP R. SELLINGER
United States Attorney