

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence  
of the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington

August 6, 2020

WILLIAM M. McCOOL, Clerk

By  Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID CRAIG MARTIN,

Defendant.

NO. CR20-116 JLR

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**(Possession of Child Pornography)**

Beginning on a date unknown, and continuing until April 20, 2020, at Seattle, within the Western District of Washington, and elsewhere, DAVID CRAIG MARTIN did knowingly possess matter that contained visual depictions the production of which involved the use of minors engaging in sexually explicit conduct and the visual depictions were of such conduct, that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which had been produced using materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and the images of child

1 | pornography involved include images of a prepubescent minor and a minor who had not  
2 | attained 12 years of age.

3 | All in violation of Title 18, United State Code, Section 2252(a)(4)(B) and 2252(b)(2).

4 | **ALLEGATIONS OF FORFEITURE**

5 | The allegation contained in Count 1 of this Indictment is hereby re-alleged and  
6 | incorporated by reference for the purpose of alleging forfeitures to the United States  
7 | pursuant to Title 18, United States Code, Section 2253(a) and 2253(b).

8 | Upon conviction of the offense alleged in Count 1 of this Indictment, the  
9 | defendant, DAVID CRAIG MARTIN, shall forfeit to the United States any property, real  
10 | or personal, used or intended to be used to commit or to promote the commission of such  
11 | offense, or any property traceable to such property; any property, real or personal,  
12 | constituting or traceable to gross profits or other proceeds obtained from such offense;  
13 | and any visual depiction described in Title 18, United States Code, Sections 2251,  
14 | 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film,  
15 | videotape, or other matter which contains any such visual depiction, which was produced,  
16 | transported, mailed, shipped, or received, in violation of Chapter 110, Title 18, United  
17 | States Code, including but not limited to the following:

- 18 | a. Any and all images of child pornography, in whatever format and however  
19 | stored; and  
20 | b. one iPhone white in color;  
21 | c. one LG cell phone;  
22 | d. one Samsung phone with a 32 GB storage card; and  
23 | e. one Visual Land Tablet.

24 |  
25 | If any of the above-described forfeitable property, as a result of any act or  
26 | omission of the defendant,

- 27 | a. cannot be located upon the exercise of due diligence;  
28 | b. has been transferred or sold to, or deposited with, a third party;  
c. has been placed beyond the jurisdiction of the Court;

- 1 d. has been substantially diminished in value; or  
2 e. has been commingled with other property which cannot be divided  
3 without difficulty;  
4


5 It is the intent of the United States, pursuant to Title 21, United States Code,  
6 Section 853(p), to seek the forfeiture of any other property of the defendant, up to the  
7 value of the above-described forfeitable property.  
8  
9

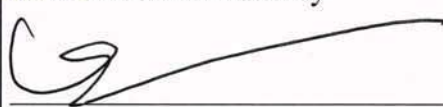
10 A TRUE BILL:


11 DATED: 8/6/2020  
12

13 *Signature of the foreperson is redacted*  
14 *pursuant to the policy of the Judicial*  
15 *Conference of the United States*

16 \_\_\_\_\_  
17 FOREPERSON  
18

19   
20 \_\_\_\_\_  
21 BRIAN T. MORAN  
22 United States Attorney

23   
24 \_\_\_\_\_  
25 KATE VAUGHAN  
26 Assistant United States Attorney

27   
28 \_\_\_\_\_  
CECELIA Y. GREGSON  
Assistant United States Attorney