

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**BILL OF INFORMATION FOR THE SEXUAL EXPLOITATION OF CHILDREN,  
DISTRIBUTION OF MATERIALS INVOLVING THE SEXUAL  
EXPLOITATION OF CHILDREN AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
CHAD MICHAEL HOTARD	*	VIOLATION: 18 U.S.C. § 2251(a), (e)
		18 U.S.C. § 2252(a)(2), (b)(1)
	*	18 U.S.C. § 2253

The United States Attorney charges that:

**COUNT 1**

**SEXUAL EXPLOITATION OF A CHILD - PRODUCTION OF CHILD PORNOGRAPHY**

On or about December 13, 2012, within the Eastern District of Louisiana and elsewhere, the defendant, **CHAD MICHAEL HOTARD**, did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

## COUNT 2

### SEXUAL EXPLOITATION OF A CHILD - PRODUCTION OF CHILD PORNOGRAPHY

On or about March 12, 2013, within the Eastern District of Louisiana and elsewhere, the defendant, **CHAD MICHAEL HOTARD**, did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

## COUNT 3

### DISTRIBUTION OF CHILD PORNOGRAPHY

On or about March 13, 2013, within the Eastern District of Louisiana, and elsewhere, the defendant, **CHAD MICHAEL HOTARD**, did knowingly distribute, and attempt to distribute, visual depictions, that is, digital images and computer images, that had been mailed, shipped, and transported in interstate and foreign commerce, by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), and such visual depictions were of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

## NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 3 of this Bill of Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 2253.

2. As a result of the offenses alleged in Counts 1 through 3, defendant, **CHAD MICHAEL HOTARD**, shall forfeit to the United States all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and/or any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, in violation of Title 18, United States Code, Sections 2251(a), 2252(a)(2), and 2253, including but not limited to:

- a. One (1) Acer Aspire laptop computer, with serial number 57337-4633; and
- b. One (1) Samsung cellular telephone with model number SGH-I577 and serial number R21C44733SF.

3. If any of the property described above as being subject to forfeiture, 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 Title 18, United States Code, Section 2253(o) to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 2253.



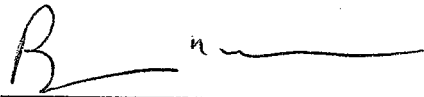
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New Orleans, Louisiana  
August 26, 2013