

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :
 :
 v. : Criminal No. 13-_____
 :
 DAVID CLARK : 18 U.S.C. §2251(a)
 : 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:

COUNT 1

On diverse dates from 2004 through March 9, 2011, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

DAVID CLARK,

did employ, use, persuade, induce, entice, and coerce a minor, Victim 1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, which visual depiction was produced or transmitted using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2251(a) and Title 18, United States Code, Section 2.

COUNT 2

On diverse dates from 2004 through March 9, 2011, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

DAVID CLARK,

did employ, use, persuade, induce, entice, and coerce a minor, Victim 2, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, which visual depiction was produced or transmitted using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2251(a) and Title 18, United States Code, Section 2.

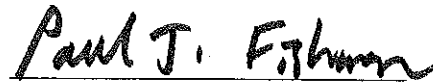
COUNT 3

On diverse dates from 2004 through March 9, 2011, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

DAVID CLARK,

did employ, use, persuade, induce, entice, and coerce a minor, Victim 3, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce or mailed, which visual depiction was produced or transmitted using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2251(a) and Title 18, United States Code, Section 2.


PAUL J. FISHMAN
United States Attorney