

SD

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

:

CRIMINAL NO. 14-

cr 475

v.

:

DATE FILED:

SEP 04 2014

WILLIAM KINSLEY

:

VIOLATIONS:

:

18 U.S.C. § 2252(a)(2) (receipt of child pornography - 1 count)

:

18 U.S.C. § 2252(a)(2) (distribution of child pornography - 2 counts)

:

18 U.S.C. § 2252(a)(4) (possession and access of child pornography - 1 count)

:

18 U.S.C. § 2 (aiding and abetting)

Notice of forfeiture

I N D I C T M E N T

COUNT ONE

THE GRAND JURY CHARGES THAT:

FILED

SEP 04 2014

**MICHAEL E. KUNZ, Clerk
By _____ Dep. Clerk**

From on or about October 8, 2008 until on or about August 4, 2011, in

Langhorne, in the Eastern District of Pennsylvania, defendant

WILLIAM KINSLEY

knowingly possessed, and knowingly accessed with intent to view, one or more books, magazines, periodicals, films, video tapes and other matter, namely visual depictions of minors engaging in sexually explicit conduct, which he found at various locations on the internet and which he downloaded to the following devices: (i) one IBM ThinkPad R61E, Serial: LX-X1689 (containing Western Digital hard drive, Serial: WXC208689940); (ii) one generic computer tower, Serial: 8619C17340094 (containing Seagate, hard drive, Serial: 9VMF0LFJ); and (iii) one

Gateway computer tower, Serial: 00281666214 (containing Western Digital hard drive, Serial:
~~9VMP0LFJ~~ *WMA8E2992573*), all of which contained, within unallocated space, the visual depictions that had
(WRONG SER)
been shipped and transported in interstate and foreign commerce. The production of these
visual depictions involved the use of minors engaging in sexually explicit conduct and the visual
depictions were of minors engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 29, 2011, in Langhorne, in the Eastern District of Pennsylvania,
defendant

WILLIAM KINSLEY

knowingly received and attempted to receive visual depictions that had been shipped and transported in interstate and foreign commerce, which visual depictions showed minors engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors engaged in sexually explicit conduct, that is, images with the path name:

QPH2_1.E01/Partition2/NONAME[NTFS]/[root]/ProgramData/AOL/C_AOL Desktop
9.6/misc/temp/My_family_incest_Serie_2011_Julia_8yo_Lisa_4yo_Mike_7yo_Lara_8yo_hot(2).
rar.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about January 21, 2011 and on or about February 16, 2011, in Langhorne, in the Eastern District of Pennsylvania, defendant

WILLIAM KINSLEY

knowingly aided and abetted the distribution of visual depictions that had been shipped and transported in interstate and foreign commerce, which visual depictions showed minors engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors engaged in sexually explicit conduct, that is, images contained within files titled:

"global2.rar," "global3.rar," and "global4.rar."

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 28, 2011, in Langhorne, in the Eastern District of Pennsylvania,
defendant

WILLIAM KINSLEY

knowingly distributed and aided and abetted the distribution of visual depictions that had been shipped and transported in interstate and foreign commerce, which visual depictions showed minors engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors engaged in sexually explicit conduct, that is, images located on the website whose name ends as follows: /loc1123/255_1417_madison.php.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 2252, set forth in this indictment, defendant

WILLIAM KINSLEY

shall forfeit to the United States of America:

(a) any visual depiction described in section 2252 or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received as a result of such violation, including, but not limited to:

- (1) one Western Digital hard drive, Serial: WXC208689940;
- (2) one Seagate, hard drive, Serial: 9VMF0LFJ; and
- (3) one Western Digital, hard drive, Serial: WMA8E2992513;

(b) any property, real or personal, used or intended to be used to commit or to promote the commission of such violation, including, but not limited to:

- (1) one IBM ThinkPad R61E, Serial: LX-X1689;
- (2) one generic computer tower, Serial: 8619C17340094; and
- (3) one Gateway computer tower, Serial: 0028166214.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- (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 Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

v.

WILLIAM KINSLEY

INDICTMENT

Counts

18 U.S.C. § 2252(a)(2) (receipt of child pornography - 1 count);
18 U.S.C. § 2252(a)(2) (distribution of child pornography - 1 count);
18 U.S.C. § 2252(a)(4) (possession and access of child pornography - 1 count);
18 U.S.C. § 2 (aiding and abetting)
Notice of forfeiture

A true bill.

Mark Helgeson

Foreman

Filed in open court this 4 THURSDAY day,
Of SEPTEMBER A.D. 2014

Clerk

Bail, \$ _____

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SD

INDICTMENT

14-475

DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106-4476

Post Office: Philadelphia

County: Philadelphia

City and State of Defendant: Langhorne, PA

County: Montgomery

Register number: N/A

Place of accident, incident, or transaction:

Eastern District of Pennsylvania

Post Office: Langhorne

County: Montgomery

RELATED CASE, IF ANY:

Criminal cases are deemed related when the answer to the following question is "yes".

Does this case involve a defendant or defendants alleged to have participated in the same action or transaction, or in the same series of acts or transactions, constituting an offense or offenses?

YES/NO: No

Case Number: N/A

Judge: N/A

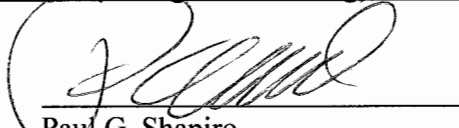
CRIMINAL: (Criminal Category - FOR USE BY U.S. ATTORNEY ONLY)

- 1. Antitrust
- 2. Income Tax and other Tax Prosecutions
- 3. Commercial Mail Fraud
- 4. Controlled Substances
- 5. Violations of 18 U.S.C. Chapters 95 and 96 (Sections 1951-55 and 1961-68) and Mail Fraud other than commercial
- 6. General Criminal

(U.S. ATTORNEY WILL PLEASE DESIGNATE PARTICULAR CRIME AND STATUTE CHARGED TO BE VIOLATED AND STATE ANY PREVIOUS CRIMINAL NUMBER FOR SPEEDY TRIAL ACT TRACKING PURPOSES)

18 U.S.C. § 2252(a)(2) (receipt of child pornography - 1 count); 18 U.S.C. § 2252(a)(2) (distribution of child pornography - 1 count); 18 U.S.C. § 2252(a)(4) (possession and access of child pornography - 1 count); 18 U.S.C. § 2 (aiding and abetting); Notice of forfeiture

DATE: 9-4-14



Paul G. Shapiro
Assistant United States Attorney