JTM DAL/JRK 2020R00854

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
	*	
v.	*	**CRIMINAL NO.** SAG-21-021
	*	
JEFFREY WHITE	*	
	*	
Defendant	*	
	*	

****

INFORMATON

COUNT ONE
(Possession of Child Pornography)

The United States Attorney for the District of Maryland charges that:

On or about July 6, 2020, in the District of Maryland, the defendant,

JEFFREY WHITE,

having previously been convicted of an offense under the laws of any State relating to the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, did knowingly possess and knowingly access with intent to view any book, magazine, periodical, film, videotape, computer disk, and any other material that contained an image of child pornography, as defined in Title 18 United States Code, Section 2256(8)(A), that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant possessed a HP Probook 650 GT laptop computer bearing Serial No. 5CG5181YKG and containing one PNY 4GB SD Card, which contained one or more visual depictions of minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B), 2252A(b)(2) & 2256

FORFEITURE ALLEGATION

The United States Attorney for the District of Maryland further charges that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 2253, 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), as a result of the Defendant's conviction under Count One of this Information.

2. Pursuant to 18 U.S.C. § 2253, upon conviction of the offense set forth in Count One of this Information, in violation of 18 U.S.C. § 2252A, the defendant,

JEFFREY WHITE,

shall forfeit to the United States:

a. any visual depiction described in Title 18, United States Code, section 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 Title 18, United States Code, Chapter 110;

b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and

c. any property, real or personal, used or intended to be used to commit or to promote the commission of the offense or any property traceable to such property.

3. The property to be forfeited includes, but is not limited to, the following:

HP Probook 650 GT laptop computer bearing Serial No. 5CG5181YKG containing one PNY 4GB SD Card

Substitute Assets

4. If any of the property described above, 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 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,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c).

18 U.S.C. §§ 2253
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)

Jonathan F. Lenzner /s DAL

Jonathan F. Lenzner
Acting United States Attorney