

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

UNITED STATES OF AMERICA        )  
  )  
  )        No. \_\_\_\_\_  
  )  
  )        Violations: Title 18, United States Code,  
  )        Sections 2252A(a)(1) and 2252A(a)(5)(B)  
JOHN CARLSON                        )

**COUNT ONE**

The DECEMBER 2011 GRAND JURY charges:

On or about July 22, 2011, at Algonquin, in the Northern District of Illinois, Western Division, and elsewhere,

JOHN CARLSON,

defendant herein, using a means or facility of interstate commerce, namely, the Internet, knowingly transported and caused to be transported child pornography, as that term is defined in Title 18, United States Code, Section 2256(8)(A), namely, a computer file titled, “Jen7.jpg”;

In violation of Title 18, United States Code, Section 2252A(a)(1).

**COUNT TWO**

The DECEMBER 2011 GRAND JURY further charges:

On or about July 22, 2011, at Algonquin, in the Northern District of Illinois, Western Division, and elsewhere,

**JOHN CARLSON,**

defendant herein, using a means or facility of interstate commerce, namely, the Internet, knowingly transported and caused to be transported child pornography, as that term is defined in Title 18, United States Code, Section 2256(8)(A), namely, a computer file titled, “Sharon 6yo Private 021.jpg”;

In violation of Title 18, United States Code, Section 2252A(a)(1).

**COUNT THREE**

The DECEMBER 2011 GRAND JURY further charges:

On or about August 24, 2011, at Algonquin, in the Northern District of Illinois,  
Western Division,

**JOHN CARLSON,**

defendant herein, knowingly possessed material, namely, a Toshiba Satellite T135-S1305 laptop computer, containing Toshiba hard drive serial number Z91PC7TDTGQ1, that contained still and video images of child pornography as defined in Title 18, United States Code, Section 2256(8)(A), such images having been shipped and transported in or affecting interstate or foreign commerce by any means, including computer;

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

**FORFEITURE ALLEGATION**

The DECEMBER 2011 GRAND JURY further alleges:

1. The allegations contained in this Indictment are realleged and incorporated by reference as if fully restated here for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253.

2. As a result of his violations of Title 18, United States Code, Sections 2252A(a)(1), and 2252A(a)(5)(B),

JOHN CARLSON,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all right, title, and interest defendant has in any visual depictions described Title 18, United States Code, Sections 2252A, and any and all property used and intended to be used to commit or to promote the commission of these violations, as well as any property traceable to such violations.

3. The interests of the defendant subject to forfeiture include, but are not limited to, the following item seized at defendant's residence on or about August 24, 2011: Toshiba Satellite T135-S1305 laptop computer, containing Toshiba hard drive serial number Z91PC7TDTGQ1.

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

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
ACTING UNITED STATES ATTORNEY