

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 22-
 :
 PERTH DE, : 18 U.S.C. §§ 2252A(a)(2)(A) and
 a/k/a “Parthasarthie Kapoor” : 2252A(a)(5)(B)

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT 1
(Distribution of Child Pornography)

From on or about September 25, 2017 through on or about April 29, 2018, in the District of New Jersey, and elsewhere, the defendant,

PERTH DE,
a/k/a “Parthasarthie Kapoor,”

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), which had been mailed, and using any means and facility of interstate and foreign commerce, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT 2
(Possession of Child Pornography)

On or about January 21, 2020, in Essex County, in the District of New Jersey and elsewhere, the defendant,

PERTH DE,
a/k/a “Parthasarthie Kapoor,”

did knowingly possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which images had been mailed, shipped, and transported, using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that were produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

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

FORFEITURE ALLEGATION

1. The allegations contained in Counts 1 and 2 of this Information are realleged here for the purpose of alleging forfeiture.

2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offenses alleged in this Information, the defendant,

**PERTH DE,
a/k/a “Parthasarthie Kapoor,”**

shall forfeit to the United States (a) all visual depictions described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, and 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, shipped, or received in violation of Title 18, United States Code, Chapter 109A; (b) all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in this Indictment; and (c) all property, real and personal, used or intended to be used to commit or to promote the commission of the offenses charged in this Indictment and all property traceable to such property. The property to be forfeited includes, but is not limited to, the following property seized from the defendant on or about January 20, 2020:

- a. A Black Motorola Cellular Telephone;
- b. A Black Zte Cellular Telephone;
- c. A Silver Samsung Cellular Telephone, bearing Serial Number R21DC2WT79P;
- d. A Black Kyocera Cellular Telephone; and
- e. A Silver Samsung Galaxy S4 Cellular Telephone.

3. 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 of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p).



PHILIP R. SELLINGER
United States Attorney