

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 20-
v.	:	DATE FILED: November 25, 2020
WILLIAM T. MCCANDLESS	:	VIOLATIONS:
	:	18 U.S.C. §§ 2260(b), (c)(2) (possession of
	:	child pornography for importation into the
	:	United States – 1 count)
	:	18 U.S.C. §§ 2252(a)(1), (b)(1) transportation
	:	of child pornography – 1 count)
	:	18 U.S.C. §§ 2252(a)(4)(B), (b)(2) (attempted
	:	access with intent to view child pornography
	:	– 1 count)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about January 25, 2017, in Philadelphia County, in the Eastern District of Pennsylvania, and elsewhere, defendant

WILLIAM T. MCCANDLESS,

outside the United States, knowingly transported or possessed with intent to transport, a visual depiction of a minor engaging in sexually explicit conduct, the production of which involved the use of a minor engaging in sexually explicit conduct, intending that the visual depiction would be imported into the United States, that is, the Eastern District of Pennsylvania, and attempted to do so.

In violation of Title 18, United States Code, Sections 2260(b), (c)(2), and 2252(b)(1).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 26, 2017, in Philadelphia County, in the Eastern District of Pennsylvania, and elsewhere, defendant

WILLIAM T. MCCANDLESS

knowingly transported and shipped, and attempted to transport and ship, a visual depiction, using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, the producing of which visual depiction involved the use of a minor engaged in sexually explicit conduct, and which visual depiction was of such conduct.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT

In or about April 2017, in Lehigh County, in the Eastern District of Pennsylvania and elsewhere, defendant

WILLIAM T. MCCANDLESS

knowingly accessed with intent to view, and attempted to access with intent to view, at least one matter which contained a visual depiction that had been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and which was produced using materials which had been mailed and shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 2260(b) and 2252, as set forth in this Indictment, defendant

WILLIAM T. MCCANDLESS

shall forfeit to the United States of America:

(a) any item which contains any child pornography which was produced, transported, mailed, shipped, or received as a result of such violations as charged in the indictment;

(b) any property, real or personal, constituting or derived from any proceeds obtained directly or indirectly from such violations: and

(c) any property, real or personal, used or intended to be used to commit or to facilitate the commission of such violations, including, but not limited to:

- (1) an Apple iPhone 5 bearing serial number FYNTR18LHG6W;
- (2) a HP ProBook laptop bearing serial number 5CG6196XJF: and
- (3) a Dell Latitude laptop bearing serial number HHR3081.

If any of the property subject to forfeiture, 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:

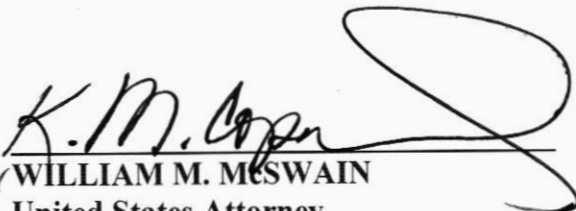
it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

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

A TRUE BILL:



act GRAND JURY FOREPERSON

for 
WILLIAM M. McSWAIN
United States Attorney