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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 CLAUD SVELMO MARCUSLUND,
14 Defendant.

CASE NO. 1:23-cr-00141-JLT-SKO
VIOLATIONS: 18 U.S.C. § 2252(a) (2) –
Distribution of a Visual Depiction of a Minor
Engaged in Sexually Explicit Conduct; 18 U.S.C. §
2422(b) – Attempted Coercion and Enticement; 18
U.S.C. §§ 2253(a) and 2428(b) – Criminal Forfeiture

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16
17 INDICTMENT

18 COUNT ONE: [18 U.S.C. § 2252(a) (2) – Distribution of a Visual Depiction of a Minor Engaged in
19 Sexually Explicit Conduct]

20 The Grand Jury charges: T H A T

21 CLAUD SVELMO MARCUSLUND,
22 defendant herein, in and around April 2023, in the County of Fresno, State and Eastern District of
23 California and elsewhere, knowingly distributed at least one visual depiction, the producing of which
24 involved at least one minor engaging in sexually explicit conduct and which depiction was of such
25 conduct, as defined in Title 18, United States Code, Section 2256, which depiction had been transported
26 in interstate or foreign commerce, had been sent or received using any means or facility of interstate or
27 foreign commerce, and which contained materials which had been mailed, shipped, or transported in
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1 interstate or foreign commerce by any means, including by computer, all in violation of Title 18, United
2 States Code, Section 2252(a)(2).

3 COUNT TWO: [18 U.S.C. § 2422(b) – Attempted Coercion and Enticement]

4 The Grand Jury further charges: T H A T

5 CLAUS SVELMO MARCUSLUND,

6 defendant herein, beginning in approximately January 2023 and continuing through July 11, 2023, in the
7 County of Fresno, State and Eastern District of California and elsewhere, did knowingly use a facility or
8 means of interstate or foreign commerce to knowingly attempt to persuade, induce, entice, and coerce an
9 individual he believed had not attained the age of 18 years to engage in any sexual activity for which
10 any person could be charged with a criminal offense, specifically California Penal Code section 288(a),
11 a lewd or lascivious act upon or with the body, or any part or member thereof, of a child who was under
12 the age of 14 years, with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual
13 desires of that person or the child, all in violation of Title 18, United States Code, Section 2422(b).

14 FORFEITURE ALLEGATION: [18 U.S.C. §§ 2253(a) and 2428(b) - Criminal Forfeiture]

15 1. Upon conviction of the offense alleged in Count One of this Indictment, defendant Claus
16 Svelmo Marcuslund shall forfeit to the United States pursuant to 18 U.S.C. § 2253(a), any and all matter
17 which contains visual depictions produced, transported, mailed, shipped or received in violation thereof;
18 any property, real or personal, constituting or traceable to gross profits or other proceeds the defendant
19 obtained as a result of said violations; and any property, real or personal, used or intended to be used to
20 commit and promote the commission of said violation, including, but not limited to:

21 a. iPhone 11 Pro, Model A2215, serial number: F17C410FN6Y2, and

22 b. iPad, Model A2270, serial number: DMPFTUQ5Q1GC.

23 2. Upon conviction of the offense alleged in Count Two of this Indictment, defendant Claus
24 Svelmo Marcuslund shall forfeit to the United States pursuant to 18 U.S.C. § 2428(b), any property, real
25 or personal, that was used or intended to be used to commit or to facilitate the commission of such
26 violation, and any property, real or personal, constituting or derived from proceeds traceable to said
27 violations, including, but not limited to:

28 a. iPhone 11 Pro, Model A2215, serial number: F17C410FN6Y2, and

1 b. iPad, Model A2270, serial number: DMPFTUQ5Q1GC.

2 3. If any property subject to forfeiture as a result of the offenses alleged in Counts One and
3 Two of this Indictment, for which defendant is convicted:

4 a. cannot be located upon the exercise of due diligence;

5 b. has been transferred or sold to, or deposited with, a third party;

6 c. has been placed beyond the jurisdiction of the Court;

7 d. has been substantially diminished in value; or

8 e. has been commingled with other property which cannot be divided without
9 difficulty;

10 it is the intent of the United States, pursuant to 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c),

11 incorporating

12 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant, up to the value of the

13 property subject to forfeiture.

14 A TRUE BILL.

15 /s/ Signature on file w/AUSA

16 _____
17 FOREPERSON

18 PHILLIP A. TALBERT
19 United States Attorney

20 By:

KIRK E. SHERRIFF

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22 KIRK E. SHERRIFF
23 Assistant United States Attorney
24 Chief, Fresno Office
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