

# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

## INDICTMENT FOR PRODUCTION OF CHILD PORNOGRAPHY, TRANSPORTATION OF CHILD PORNOGRAPHY, AND OBSTRUCTION OF JUSTICE

v. \* CRIMINAL NO. 22-45 \* SECTION: SECT. A MAG. 2

JAYDEN D.D. HALL \* VIOLATIONS: 18 U.S.C. § 1519

18 U.S.C. § 2251(a) 18 U.S.C. § 2251(e) 18 U.S.C. § 2252(a)(1)

18 U.S.C. § 2252(b)(1)

The Grand Jury charges that:

### COUNT 1 (Production of Child Pornography)

On or about March 6, 2021, within the Eastern District of Louisiana, and elsewhere, the defendant, **JAYDEN D.D. HALL**, did knowingly employ, use, persuade, induce, entice, and coerce a minor victim to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and the visual depiction was transported in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 2251(a) and (e).

#### COUNT 2 (Transportation of Child Pornography)

On or about March 6, 2021, in the Eastern District of Louisiana, and elsewhere, the defendant, **JAYDEN D.D. HALL**, did knowingly transport, using any means of interstate commerce, including by computer, visual depictions, that is, digital images and videos and computer images, the production of which involved the use of a minor, engaging in sexually explicit conduct, and such visual depictions were of such conduct, in violation of Title 18, United States Code, Sections 2252(a)(1) and (b)(1).

#### **COUNT 3** (Obstruction of Justice)

On or about July 7, 2021, in the Eastern District of Louisiana, the defendant, **JAYDEN D.D. HALL**, did knowingly alter, destroy, mutilate, conceal, and cover up a record, document, and tangible object, to wit, an Apple iPhone and the files contained within it, with the intent to impede, obstruct, and influence an investigation into a matter that was within the jurisdiction of the Department of Homeland Security, a department and agency of the United States, in violation of Title 18, United States Code, Section 1519.

#### **COUNT 4** (Transportation of Child Pornography)

On or about November 16, 2021, in the Eastern District of Louisiana, and elsewhere, the defendant, **JAYDEN D.D. HALL**, did knowingly transport, using any means of interstate commerce, including by computer, visual depictions, that is, digital images and videos and computer images, the production of which involved the use of a minor, engaging in sexually explicit conduct, and such visual depictions were of such conduct, in violation of Title 18, United States Code, Sections 2252(a)(1) and (b)(1).

#### <u>COUNT 5</u> (Transportation of Child Pornography)

On or about November 18, 2021, in the Eastern District of Louisiana, and elsewhere, the defendant, **JAYDEN D.D. HALL**, did knowingly transport, using any means of interstate commerce, including by computer, visual depictions, that is, digital images and videos and computer images, the production of which involved the use of a minor, engaging in sexually explicit conduct, and such visual depictions were of such conduct, in violation of Title 18, United States Code, Sections 2252(a)(1) and (b)(1).

#### NOTICE OF FORFEITURE

- 1. The allegations of Counts 1 through 5 of this Indictment are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.
- 2. As a result of the offenses alleged in Counts 1, 2, 4 and 5, the defendant **JAYDEN D.D. HALL**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253, any visual depiction as defined above; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from said offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of said offenses, and any property traceable to such property.
- 3. If any of the above-described property, 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 person;
  - 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 subdivided without difficulty;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

A TRUE BILL:



DUANE A. EVANS UNITED STATES ATTORNEY

NICHOLAS D. MOSES

Assistant United States Attorney

New Orleans, Louisiana March 11, 2022