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★ SEP 17 2018 ★

BROOKLYN OFFICE

EG:MEF
F. #2018R00823

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

- against -

JONATHAN DEUTSCH,

Defendant.

-----X

INDICTMENT

CR 18 00502

Cr. No. _____
(T. 18, U.S.C., §§ 2251(a), 2251(e), 2253(a),
2253(b) and 3551 et seq.; T. 21, U.S.C.,
§ 853(p))

BLOCK, J.

KUO, M.J.

THE GRAND JURY CHARGES:

COUNT ONE

(Sexual Exploitation of a Child – John Doe 1)

1. On or about January 13, 2017, within the Eastern District of New York and elsewhere, the defendant JONATHAN DEUTSCH did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: John Doe 1, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and which would be in and affecting interstate and foreign commerce, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depictions were

actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT TWO

(Sexual Exploitation of a Child – Jane Doe 1)

2. On or about January 23, 2017, within the Eastern District of New York and elsewhere, the defendant JONATHAN DEUTSCH did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe 1, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and which would be in and affecting interstate and foreign commerce, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depictions were actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT THREE

(Sexual Exploitation of a Child – Jane Doe 1)

3. On or about January 24, 2017, within the Eastern District of New York and elsewhere, the defendant JONATHAN DEUTSCH did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe 1, to engage in

sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and which would be in and affecting interstate and foreign commerce, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depictions were actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT FOUR

(Sexual Exploitation of a Child – Jane Doe 2)

4. On or about February 20, 2017, within the Eastern District of New York and elsewhere, the defendant JONATHAN DEUTSCH did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe 2, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and which would be in and affecting interstate and foreign commerce, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depictions were

actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT FIVE

(Sexual Exploitation of a Child – Jane Doe 3)

5. On or about May 18, 2017, within the Eastern District of New York and elsewhere, the defendant JONATHAN DEUTSCH did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe 3, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and which would be in and affecting interstate and foreign commerce, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depictions were actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

6. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253(a), which requires the forfeiture of: (a) any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B, or 2260

of Title 18 of the United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting, or traceable to, gross profits or other proceeds obtained from the offenses; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, or any property traceable to such property, including, but not limited to the following:

- (a) One Gray Apple MacBook Pro Laptop,
Serial number CPWJLK7KDTY3;
- (b) One Gray Apple MacBook Air Laptop,
Serial number C02N900XG6D5;
- (c) One Gray Apple iPad,
Serial number DLXH7Z6MDJ8T;
- (d) One Black Apple iPhone X;
- (e) One Apple iPhone 6, Model number A1549,
IMEI number 354411063842612;
- (f) One Apple Mac Mini, Model A1283,
Serial number YM0081P39G5;
- (g) One Gray Apple iMac, Model number A1225,
Serial number QP9300WQ0TM;
- (h) One 250 GB Seagate Hard Drive,
Serial number 3ND2AW9C;
- (i) One Black Western Digital (WD) External Hard Drive,
Serial number WCAWZ0891570;
- (j) One Black Western Digital (WD) External Hard Drive,
Serial number WCAVY2086429;
- (k) One Black Western Digital (WD) External Hard Drive,
Serial number W0A8J1962444;

- (l) One Sabrent External Hard Drive, Serial number 60375028908214;
- (m) One Seagate External Hard Drive, Serial number NA8JECKX;
- (n) One Black Seagate 160 GB External Hard Drive, Serial number 5JS3S1E0; and
- (o) One Black Seagate 250 GB External Hard Drive, Serial number 5NF0T2HT,

all seized from the defendant's residence on or about December 22, 2017.

7. If any of the above-described forfeitable 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 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 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any

other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 2253(a) and 2253(b); Title 21, United States Code, Section 853(p))

A TRUE BILL

FOREPERSON

RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

<
BY: ~~ACTING UNITED STATES ATTORNEY~~
PURSUANT TO 28 C.F.R. O.136

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

JONATHAN DEUTSCH,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 2251(a), 2251(e), 2253, 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p))

_____ *Foreperson*

Filed in open court this _____ day,

of _____ A.D. 20 _____

_____ *Clerk*

Bail, \$ _____

Megan E. Farrell, Assistant U.S. Attorney (718) 254-6448