

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

CHARLES BORRELLI

Crim. No. 24-cr-577 (RMB)

18 U.S.C. § 2252A(a)(2)(A)

**SUPERSEDING INFORMATION**

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

On or about January 3, 2022, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

CHARLES BORRELLI,

did knowingly receive and distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which had been mailed, using a means and facility of interstate and foreign commerce, shipped and transported in and affecting interstate and foreign commerce by any means, including computer, after having previously been convicted, in the State of New Jersey, of possession of child pornography, in violation of N.J.C.S. 2C:24-4B(5) BIII.

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

## FORFEITURE ALLEGATION

1. Upon conviction of the violation of Title 18, United States Code, Section 2252A(a)(2)(A), as alleged in the foregoing Superseding Information, the defendant,

CHARLES BORRELLI,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all rights, title and interest in the following:

- (a) any visual depiction described in 18 U.S.C. §§ 2251, 2251A, 2252, 2252A, 2252B, or 2260, 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 18 U.S.C. Part I, Chapter 110;
- (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense charged in this Information, and all property traceable to such property; and
- (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, and all property traceable to such property.


2. The property to be forfeited includes, but is not limited to, all of the defendant's right, title, and interest in the following item(s):

- (1) One iPad
- (2) iPhone 11 Pro Max
- (3) G Drive 2 TB External Hard Drive
- (4) Kexin Portable SSD
- (5) (2) Qnine SSDs
- (6) Crucial X8 2 TB Portable SSD
- (7) Amplim 512GB Micro SD Card

**SUBSTITUTE ASSETS PROVISION**

3. 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 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;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253, to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

  
PHILIP R. SELLINGER  
United States Attorney

CASE NUMBER: \_\_\_\_\_

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**INFORMATION FOR**

**18 U.S.C. § 2252A(a)(2)(A)**

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**PHILIP R. SELLINGER**

*U.S. ATTORNEY  
NEWARK, NEW JERSEY*

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**LINDSEY R. HARTEIS**

*ASSISTANT U.S. ATTORNEY  
CAMDEN, NEW JERSEY  
856-757-5026*

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