

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No.
	:	
	:	18 U.S.C. §§ 2252A(a) (2) (A) and (B)
v.	:	18 U.S.C. § 2252A(a) (5) (B) and
	:	18 U.S.C. § 2253
	:	
CARL TULLIS	:	<u>I N D I C T M E N T</u>

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNT 1
(Distribution of Child Pornography)

On or about March 26, 2011, in Union County, in the District of New Jersey, and elsewhere, the defendant,

CARL TULLIS,

did knowingly distribute child pornography and material that contained child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

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

COUNT 2
(Distribution of Child Pornography)

On or about May 4, 2011, in Union County, in the District of New Jersey, and elsewhere, the defendant,

CARL TULLIS,

did knowingly distribute child pornography and material that contained child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

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

COUNT 3
(Possession of Child Pornography)

On or about June 2, 2011, in Union County, in the District of New Jersey, and elsewhere, the defendant,

CARL TULLIS,

did knowingly possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which images were mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which images were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B) and Section 2.

FORFEITURE ALLEGATIONS

1. The allegations contained in this Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253.

2. Upon conviction of any offenses set forth in this Indictment, in violation of Title 18, United States Code, Sections 2252A, the defendant,

CARL TULLIS,

shall forfeit to the United States:

a. any and all matters that contain visual depictions of child pornography, in violation of the charged offenses;

b. any property constituting or traceable to gross profits or other proceeds obtained, directly or indirectly, from such offenses; and

c. any and all property used or intended to be used to commit and to promote the commission of the aforementioned offenses or any property traceable to such property, including but not limited to the following:

- i. IBM Thinkpad laptop, serial number 99PXYZT;
- ii. Fujitsu MHT2040AH 40GB hard drive, serial number NPOGT452AFYK;
- iii. HP G61 laptop, serial number CNF0025MJV;
- iv. Seagate ST9500420AS 500GB hard drive, serial number 5VJ36HEX;

- v. Dell Dimension 2400 desktop, serial number GWKQV31;
- vi. Western Digital WD400 40GB hard drive, serial number WMAATG071817;
- vii. San Disk Cruzer 8GB thumb drive, serial number SDCZ6-8192RB; and
- viii. HP 16GB thumb drive, serial number SDCZ6-8192RB.

3. If any of the property described above, 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, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,

United States Code, Section 853(p), as incorporated by Title 18,
United States Code, Section 2253(b) and by Title 28, United States
Code, Section 2461(c).

A TRUE BILL

FOREPERSON



PAUL J. FISHMAN
United States Attorney