

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARK EARL MCLEOD,

Defendant.

INDICTMENT

_____/

The Grand Jury charges:

COUNT ONE

(Distribution of Child Pornography)

On or about February 25, 2012, in Osceola County, in the Southern Division of the Western District of Michigan,

MARK EARL MCLEOD

knowingly distributed child pornography that was shipped and transported in and affecting interstate and foreign commerce by any means, including by computer. The defendant distributed child pornography via the Internet using a peer-to-peer file sharing program, including, but not limited to, one or more of the visual depictions listed below by file name:

1. REALLY SICK 9yo boys fucking in the ASS Preteen Pedo Boys Playing Sucking Gay incest, incest, 8, 9, 10, 11, 12, 13, 14, 15, 16RBV KDV PT R@YGOLD PRT PTHC PJK dick cock Preteen.jpg; and
2. !2005! Preteen boys posing nude zadoom kdv rbv pthc fenerbahce shx gay sex 9yo 106yo 11yo 112(1)(1).JPG.

18 U.S.C. § 2252A(a)(2)(A) and (b)(1)

18 U.S.C. § 2256(8)(A)

COUNT TWO
(Possession of Child Pornography)

On or about May 7, 2012, in Osceola County, in the Southern Division of the Western District of Michigan,

MARK EARL MCLEOD

knowingly possessed approximately 564 images and approximately 48 videos of child pornography, including, but not limited to, one or more of the visual depictions listed below by file name:

1. aaaa boylove gay pedo preteen boy sex child porn 107.jpg;
2. aaaa boylove gay pedo preteen boy sex child porn 129.jpg;
3. aaaa boylove gay pedo preteen boy sex child porn 143.jpg;
4. 1 [name redacted] & [name redacted] 2 Cute Gay Preteen Boys 11Yo 10Yo Brothers Naked Nude On Bed Pedo Young Child Sex Kdv Rbv Pjk(11).jpg;
5. {FC03A2F5-2875-496D-86D2-C86F8C1BF739}.jpg; and
6. Preteen Boys 3some RBV KDV PT R@YGOLD PRT PTHC PJK Preteen Kids Boys Little illegal Incest Pedo Young Gay Teen Innocent Child Hairless 08.jpg.

Such depictions were shipped and transported using any means and facility of interstate and foreign commerce. Specifically, the defendant downloaded these images from the Internet.

18 U.S.C. § 2252A(a)(5)(B) and (b)(2)

18 U.S.C. § 2256(8)(A)

FORFEITURE ALLEGATION
(Distribution of Child Pornography; Possession of Child Pornography)

The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C.

§ 2253.

Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of 18 U.S.C. § 2252A,

MARK EARL MCLEOD

shall forfeit to the United States of America any visual depiction described in 18 U.S.C. § 2252A; any matter which contains any such visual depiction that was produced, transported, mailed, shipped, and received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses or any property traceable to such property. The property to be forfeited, as to both counts, includes, but is not limited to, the following:

- a. Black custom Silverstone computer, Serial Number 200712100098;
- b. Red Lexar 256 MB USB thumbdrive; and
- c. CDs/DVDs seized from the defendant's residence on or about May 7, 2012, that contain child pornography.

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 21
U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and by 28 U.S.C. § 2461(c).

18 U.S.C. § 2253
18 U.S.C. § 2252A
18 U.S.C. § 2256(8)(A)
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)

A TRUE BILL



GRAND JURY FOREPERSON

PATRICK A. MILES, JR.
United States Attorney



TESSA K. HESSMILLER
Assistant United States Attorney