



COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about September 29, 2008, in Portsmouth, in the Eastern District of Virginia, defendant PAUL ALONZO EWING did unlawfully and knowingly possess material, that is, a hard drive manufactured by Hitachi outside of the state of Virginia with one or more images of child pornography, which images had been transported in interstate and foreign commerce by any means, including by computer, and which images had been produced using materials that had been shipped and transported in interstate and foreign commerce, in that the defendant possessed images of a known victim of child pornography on that hard drive.

(In violation of Title 18, United States Code, Sections 2252A(a)(5)(B), 2256(1), 2256(2), and 2256(8)(A).)

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about September 29, 2008, in Portsmouth, in the Eastern District of Virginia, defendant PAUL ALONZO EWING did unlawfully and knowingly possess material, that is, a USB thumb drive manufactured by PNY outside of the state of Virginia with one or more images of child pornography, which images had been transported in interstate and foreign commerce by any means, including by computer, and which images had been produced using materials that had been shipped and transported in interstate and foreign commerce, in that the defendant possessed images of a known victim of child pornography on that thumb drive.

(In violation of Title 18, United States Code, Sections 2252A(a)(5)(B), 2256(1), 2256(2), and 2256(8)(A).)

## CRIMINAL FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

A. Upon conviction for violating Title 18, United States Code, 2252A(a)(5)(B), defendant PAUL ALONZO EWING shall forfeit to the United States:

1. Any and all matter which contains child pornography produced, transported, shipped, received, or possessed in violation of Title 18, United States Code, Section 2251 *et seq.*; and

2. Any and all property used or intended to be used in any manner or part to commit and to promote the commission of violations of Title 18, United States Code, Section 2251 *et seq.*

B. The property subject to forfeiture under Paragraph A includes, but is not limited to, the following items seized from the defendant's residence on or about September 29, 2008:

1. One (1) Hewlett Packard desktop computer model Pavilion xt938 bearing serial number MX14029819

2. One (1) IBM hard drive model DHEA-36480 with serial number J90B7095J93 manufactured in Thailand.

3. One (1) Compaq laptop computer model Presario 900 bearing serial number 9X2BKSBZ10V0.

4. One (1) Hitachi hard drive model DK23DA-20F with serial number J2UM14DGFF manufactured in Phillipines.

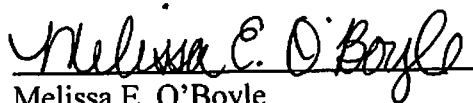
5. One (1) LG cell phone model VX9900-0 bearing serial number 710KPPB0504632.

6. One (1) LG cell phone bearing serial number 703KPNY4689639.

7. One (1) PNY USB 256-megabyte thumb drive model Attache.

(In violation of Title 18, United States Code, Section 2253.)

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UNITED STATES ATTORNEY



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