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CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

THOMAS W. MICHAELIS,)

Defendant.)

INDICTMENT

JUDGE:

3 : 1 4 C R 0 4 0 0

C.R. No. _____

18 U.S.C. § 2252(a)(2)

18 U.S.C. § 2252(a)(4)(B)

JUDGE HELMICK

COUNT 1

MAG. JUDGE JAMES R. KNEPP II

(Receipt and Distribution of Material Involving the Sexual Exploitation of a Child)

The Grand Jury charges:

From on or about April 21, 2014 to on or about May 12, 2014, in the Northern District of Ohio, Western Division, and elsewhere, the defendant, THOMAS W. MICHAELIS, did knowingly receive and distribute numerous visual depictions using any means or facility of interstate commerce, the production of such visual depictions involved the use of minors engaged in sexually explicit conduct, and such visual depictions were of such conduct, in violation of 18 U.S.C. § 2252(a)(2).

ORIGINAL

COUNT 2

(Possession and Access with Intent to View of
Material Involving the Sexual Exploitation of a Child)

The Grand Jury further charges:

From on or about January 13, 2014 to on or about May 12, 2014, in the Northern District of Ohio, Western Division, and elsewhere, the defendant, THOMAS W. MICHAELIS, did knowingly possess and access with intent to view one or more Internet websites which contained numerous visual depictions that had been shipped and transported using any means and facility of interstate commerce, the production of such visual depictions involved the use of minors engaged in sexually explicit conduct, and such visual depictions were of such conduct, in violation of 18 U.S.C. § 2252(a)(4)(B).

FORFEITURE SPECIFICATION

The Grand Jury further charges:

1. The allegations contained in Counts 1 and 2 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture, pursuant to the provisions of 18 U.S.C. § 2253.

2. Pursuant to 18 U.S.C. § 2253, upon conviction of an offense, in violation of 18 U.S.C. § 2252, the defendant, THOMAS W. MICHAELIS, shall forfeit to the United States of America, the following property:

- a) Any visual depiction described in Title 18, United States Code, sections 2251, 2251A, or 2252, 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 Title 18, United States Code, Chapter 110;
- b) Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense[s]; and

- c) Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense[s].

3. The property to be forfeited by the defendant, THOMAS W. MICHAELIS, includes, but is not limited to, the following:

- a) Western Digital external hard drive, serial number WCAZA3094030, seized from 5679 Monroe Street, #1119, Sylvania, Ohio on or about May 12, 2014; and
- b) iMac computer, serial number QP8360SPZE3, seized from 5679 Monroe Street, #1119, Sylvania, Ohio on or about May 12, 2014.

A TRUE BILL.