KOH JRB/CMS: USAO 2022R00355

v.

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

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UNITED STATES OF AMERICA

DELVON LASHAWN REDD,

Defendant

CRIMINAL NO. 657422CR242

(Aggravated Sexual Abuse of a Child, 18 U.S.C. § 2241(c); Forfeiture, 18 U.S.C. § 2253, 21 U.S.C. § 853(p),

28 U.S.C. § 2461(c))

INDICTMENT

<u>COUNT ONE</u> (Aggravated Sexual Abuse of a Child)

The Grand Jury for the District of Maryland charges that:

Between on or about May 6, 2022, and on or about May 7, 2022, in the District of

Maryland and elsewhere, the defendant,

DELVON LASHAWN REDD,

while in the special maritime and territorial jurisdiction of the United States, did knowingly

engage in and attempt to engage in a sexual act, as defined in 18 U.S.C. § 2246(2), with Victim

A, a person who had not attained the age of 12 years.

18 U.S.C. § 2241(c)

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FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 2253, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of the defendant's conviction under Count One of this Indictment.

Child Exploitation Forfeiture

2. Upon conviction of the offense alleged in Count One of this Indictment, the defendant,

DELVON LASHAWN REDD,

shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a):

a. any visual depiction described in Title 18, United States Code, Sections, 2251, 2251A, 2252, or 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, received or possessed 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 such offense; and

c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

Substitute Assets

3. If, as a result of any act or omission of the defendant, any of the property described above as being subject to forfeiture:

- 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 that cannot be subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c).

18 U.S.C. § 2253 21 U.S.C. § 853(p) 28 U.S.C. § 2461(c)

Erek L. Barron

Erek L. Barron United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Date: July **7**, 2022