



COUNT TWO

On or about April 3, 2005, in Norfolk, in the Eastern District of Virginia, defendant SHON M. WALTER did unlawfully and knowingly receive child pornography, as defined in Title 18 United States Code Section 2256(8), that had been shipped or transported in interstate and foreign commerce by any means, including by computer, in that the defendant received over the internet one or more images of child pornography, including, but not limited to, an image bearing the file name:

[REDACTED]

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

COUNT THREE

On or about June 10, 2005, in Norfolk, in the Eastern District of Virginia, defendant SHON M. WALTER did unlawfully and knowingly receive child pornography, as defined in Title 18 United States Code Section 2256(8), that had been shipped or transported in interstate and foreign commerce by any means, including by computer, in that the defendant received over the internet one or more images of child pornography, including, but not limited to, an image bearing the file name: [REDACTED]

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

COUNT FOUR

On or about June 18, 2005, in Norfolk, in the Eastern District of Virginia, defendant SHON M. WALTER did unlawfully and knowingly receive child pornography, as defined in Title 18 United States Code Section 2256(8), that had been shipped or transported in interstate and foreign commerce by any means, including by computer, in that the defendant received over the internet one or more images of child pornography, including, but not limited to, an image bearing the file name: [REDACTED]

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

COUNT FIVE

On or about June 24, 2005, in Norfolk, in the Eastern District of Virginia, defendant SHON M. WALTER did unlawfully and knowingly receive child pornography, as defined in Title 18 United States Code Section 2256(8), that had been shipped or transported in interstate and foreign commerce by any means, including by computer, in that the defendant received over the internet one or more images of child pornography, including, but not limited to, an image bearing the file name: [REDACTED]

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

COUNT SIX

On or about March 25, 2008, in Norfolk, in the Eastern District of Virginia, defendant SHON M. WALTER did unlawfully and knowingly receive child pornography, as defined in Title 18 United States Code Section 2256(8), that had been shipped or transported in interstate and foreign commerce by any means, including by computer, in that the defendant received over the internet one or more images of child pornography, including, but not limited to, an image bearing the file name: ██████████

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

COUNT SEVEN

On or about December 11, 2008, in Norfolk, in the Eastern District of Virginia, defendant SHON M. WALTER, did unlawfully and knowingly possess material, that is, a Western Digital hard drive, serial number WMAD11862768, 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 various images of child pornography on that hard drive, including, but not limited to, an image bearing the file name: ██████████

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

COUNT EIGHT

On or about December 11, 2008, in Norfolk, in the Eastern District of Virginia, defendant SHON M. WALTER, did unlawfully and knowingly possess material, that is, a Hitachi hard drive, serial number SERTDB2H, 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 various images of child pornography on that hard drive, including, but not limited to, an image bearing the file name:

[REDACTED]

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

COUNT NINE

On or about December 11, 2008, in Norfolk, in the Eastern District of Virginia, defendant SHON M. WALTER, did unlawfully and knowingly possess material, that is, a Simpletech external hard drive containing a Hitachi hard drive, serial number HDP725032GLA360, 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 various images of child pornography on that hard drive, including, but not limited to, an image bearing the file name: [REDACTED]

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

COUNT TEN

On or about December 11, 2008, in Norfolk, in the Eastern District of Virginia, defendant SHON M. WALTER, did unlawfully and knowingly possess material, that is, a Memorex compact disk, 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 various images of child pornography on that compact disk, including, but not limited to, an image bearing the file name: [REDACTED]

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

## CRIMINAL FORFEITURE

Upon conviction for violating Title 18, United States Code, 2252A(a)(2)(A), SHON M. WALTER shall forfeit to the United States any and all matter which contains child pornography produced, transported, shipped, received, or possessed in violation thereof and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violation, including, but not limited to the following items which were taken from defendant's residence on December 11, 2008:

- One desktop computer; make: Dell, model : Dimension 8200; serial number: 2V54T11
- One hard drive; make: Western Digital, serial number: WMAD11862768
- One hard drive; make: Hitachi, serial number SERTDB2H
- One external hard drive; make: Simpletech, containing a Hitachi hard drive, serial number HDP725032GLA360
- One compact disk, make: Memorex

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