

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	DATE FILED: _____
v.	:	CRIMINAL NO. _____
JOHN WORMAN	:	VIOLATIONS:
CONCETTA JACKSON	:	18 U.S.C. § 2251(a)(1)
DOROTHY PRAWDZIK	:	(Use of a minor to produce visual depic-
	:	tions of sexually explicit conduct - 51
	:	counts)
	:	18 U.S.C. § 2252(a)(4)
	:	(possession of child pornography- 1 count)
	:	18 U.S.C. § 2
	:	(aiding and abetting)
	:	Notice of forfeiture

INDICTMENT
COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about March 5, 2001, in Colwyn, in the Eastern District of Pennsylvania,
the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use,
persuade, induce, entice, and coerce, Cha.B., a minor, to engage in sexually explicit conduct
for the purpose of producing a visual depiction of that conduct and the visual depiction was
produced using materials that had been sent by mail and shipped and transported in interstate
and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 11, 2001, in Colwyn, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Cha.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 10, 2002, in Colwyn, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Cha.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 17, 2002, in Colwyn, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Cha.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 20, 2002, in Colwyn, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Cha.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

In or about January 2002, the exact date being unknown to the Grand Jury, in Colwyn, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Chr.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 4, 2002, in Colwyn, in the Eastern District of Pennsylvania,
the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use,
persuade, induce, entice, and coerce, Chr.B., a minor, to engage in sexually explicit conduct
for the purpose of producing a visual depiction of that conduct and the visual depiction was
produced using materials that had been sent by mail and shipped and transported in interstate
and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 8, 2002, in Colwyn, in the Eastern District of Pennsylvania,
the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use,
persuade, induce, entice, and coerce, Chr.B., a minor, to engage in sexually explicit conduct
for the purpose of producing a visual depiction of that conduct and the visual depiction was
produced using materials that had been sent by mail and shipped and transported in interstate
and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

In or about July 2002, the exact date being unknown to the Grand Jury, in Colwyn, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Chr.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 16, 2002, in Colwyn, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Chr.B., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 22, 2001, in Colwyn, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
DOROTHY PRAWDZIK**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, D.P., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 9, 2002, in Colwyn, in the Eastern District of Pennsylvania,
the defendants

**JOHN WORMAN, and
DOROTHY PRAWDZIK**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use,
persuade, induce, entice, and coerce, D.P., a minor, to engage in sexually explicit conduct for
the purpose of producing a visual depiction of that conduct, and aided and abetted such
production, and the visual depiction was produced using materials that had been sent by mail
and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and
Title 18, United States Code, Section 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 15, 2002, in Colwyn, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
DOROTHY PRAWDZIK**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, D.P., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 15, 2002, in Colwyn, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
DOROTHY PRAWDZIK**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, D.P., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 29, 2001, in Colwyn, in the Eastern District of Pennsylvania,
the defendants

**JOHN WORMAN, and
DOROTHY PRAWDZIK**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use,
persuade, induce, entice, and coerce, T.P., a minor, to engage in sexually explicit conduct for
the purpose of producing a visual depiction of that conduct, and aided and abetted such
production, and the visual depiction was produced using materials that had been sent by mail
and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and
Title 18, United States Code, Section 2.

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 29, 2001, in Colwyn, in the Eastern District of Pennsylvania,
the defendants

**JOHN WORMAN, and
DOROTHY PRAWDZIK**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use,
persuade, induce, entice, and coerce, T.P., a minor, to engage in sexually explicit conduct for
the purpose of producing a visual depiction of that conduct, and aided and abetted such
production, and the visual depiction was produced using materials that had been sent by mail
and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and
Title 18, United States Code, Section 2.

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 2, 2001, in Colwyn, in the Eastern District of Pennsylvania,
the defendants

**JOHN WORMAN, and
DOROTHY PRAWDZIK**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use,
persuade, induce, entice, and coerce, T.P., a minor, to engage in sexually explicit conduct for
the purpose of producing a visual depiction of that conduct, and aided and abetted such
production, and the visual depiction was produced using materials that had been sent by mail
and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and
Title 18, United States Code, Section 2.

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 2, 2002, in Colwyn, in the Eastern District of Pennsylvania,
the defendants

**JOHN WORMAN, and
DOROTHY PRAWDZIK**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use,
persuade, induce, entice, and coerce, T.P., a minor, to engage in sexually explicit conduct for
the purpose of producing a visual depiction of that conduct, and aided and abetted such
production, and the visual depiction was produced using materials that had been sent by mail
and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and
Title 18, United States Code, Section 2.

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 22, 2001, in Colwyn, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
DOROTHY PRAWDZIK**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, T.P., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 22, 2001, in Colwyn, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
DOROTHY PRAWDZIK**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, R.G., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT TWENTY ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 27, 2004, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, V.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT TWENTY TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 21, 2004, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, V.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT TWENTY THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 7, 2005, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, V.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT TWENTY FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 21, 2005, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, V.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT TWENTY FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 2, 2005, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, V.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT TWENTY SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 15, 2004, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, H.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT TWENTY SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 2, 2004, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, H.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT TWENTY EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 23, 2004, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, H.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT TWENTY NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 22, 2005, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, H.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 26, 2005, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, H.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT THIRTY ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 8, 2003, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, S.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT THIRTY TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 15, 2003, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, S.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT THIRTY THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 15, 2003, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, S.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT THIRTY FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 26, 2004, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, S.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT THIRTY FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 13, 2005, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, S.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT THIRTY SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 26, 2005, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, M.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT THIRTY SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 27, 2005, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, M.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT THIRTY EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 28, 2005, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, M.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT THIRTY NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 12, 2005, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, M.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT FORTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 12, 2005, in Collingdale, in the Eastern District of Pennsylvania, the defendants

**JOHN WORMAN, and
CONCETTA JACKSON**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, M.J., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e), and Title 18, United States Code, Section 2.

COUNT FORTY ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 2, 2001, in Colwyn, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, V.G., a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FORTY TWO

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about January 1, 2004 through on or about March 31, 2004, the exact date being unknown to the Grand Jury, in Collingdale, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Ka.B, a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FORTY THREE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about January 1, 2004 through on or about March 31, 2004, the exact date being unknown to the Grand Jury, in Collingdale, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Ka.B, a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FORTY FOUR

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about January 1, 2004 through on or about March 31, 2004, the exact date being unknown to the Grand Jury, in Collingdale, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Ka.B, a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FORTY FIVE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about January 1, 2004 through on or about March 31, 2004, the exact date being unknown to the Grand Jury, in Collingdale, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Ka.B, a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FORTY SIX

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about January 1, 2004 through on or about March 31, 2004, the exact date being unknown to the Grand Jury, in Collingdale, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Ka.B, a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FORTY SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about February 1, 2004 through on or about July 31, 2005, the exact date being unknown to the Grand Jury, in Collingdale, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Kr.B, a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FORTY EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about February 1, 2004 through on or about July 31, 2005, the exact date being unknown to the Grand Jury, in Collingdale, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Kr.B, a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FORTY NINE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about February 1, 2004 through on or about July 31, 2005, the exact date being unknown to the Grand Jury, in Collingdale, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Kr.B, a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FIFTY

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about February 1, 2004 through on or about July 31, 2005, the exact date being unknown to the Grand Jury, in Collingdale, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Kr.B, a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FIFTY ONE

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about February 1, 2004 through on or about July 31, 2005, the exact date being unknown to the Grand Jury, in Collingdale, in the Eastern District of Pennsylvania, the defendant

JOHN WORMAN

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, Kr.B, a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and aided and abetted such production, and the visual depiction was produced using materials that had been sent by mail and shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT FIFTY TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 3, 2006, in Colwyn, in the Eastern District of Pennsylvania,
defendant

JOHN WORMAN

knowingly possessed one or more books, magazines, periodicals, films, video tapes, and other matter, namely ten VHS video tapes containing visual depictions, and in excess of 600 visual depictions contained on computer hard drives. These visual depictions had been shipped and transported in interstate and foreign commerce and had been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce. The production of these visual depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of minors engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 2251(a) and 2252(a)(4), set forth in this indictment, the defendant

JOHN WORMAN

shall forfeit to the United States of America any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation of Title 18, United States Code, Sections 2251(a)(1) and 2252(a)(4), as charged in this indictment, including, but not limited to:

1. Seagate Hard Drive, ST36421A, serial number 3BE06HSA; and
2. IBM Hard Drive, serial number 11S03L5610Z1MFJTGP5257; and
3. Western Digital Hard Drive, serial number WCALA1888450; and
4. Western Digital Hard Drive, serial number WM3531314815; and
5. Maxtor Hard Drive, serial number Y41PED9E;
6. Maxtor Hard Drive, serial number R30GWYWA;
7. Canon EOS Rebel Body, serial number 0860336492 and 80 to 200 lens, serial number 89002307;
8. Lap top computer, serial number 78-LDY77;
9. Compac Tower computer, serial number 0933CVVP0062;
10. Concord Camera digital camera, Concord 4060AF, serial number AB1027666;
11. JVC video camera, serial number 926Q5455; and

12. JVC video camera, serial number 077Q3396.

All pursuant to Title 18, United States Code, Section 2253.

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY