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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

September 2019 Grand Jury

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JOSUE GAMALIEL VIDAL QUINTANILLA,  
aka "Firstlast6543,"  
  
Defendant.

ED CR No. 5:20-cr-00192-JGB  
  
I N D I C T M E N T  
  
[18 U.S.C. §§ 2252A(a)(2)(A),  
(b)(1): Distribution and Receipt  
of Child Pornography; 18 U.S.C.  
§§ 2252A(a)(1), (b)(1):  
Transportation of Child  
Pornography]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

On or about August 12, 2020, in San Bernardino County, within the Central District of California, defendant JOSUE GAMALIEL VIDAL QUINTANILLA, also known as "Firstlast6543," knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce had been shipped and transported in and affecting interstate and foreign commerce by any means, including

1 by computer, knowing that the images and videos were child  
2 pornography.

3 The child pornography that defendant VIDAL received consisted of  
4 the following videos:

- 5 1. A video depicting an adult male penetrating a female child  
6 under the age of 12 years old; and
- 7 2. A video depicting a prepubescent female child masturbating.

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COUNT TWO

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

On or about August 14, 2020, in San Bernardino County, within the Central District of California, defendant JOSUE GAMALIEL VIDAL QUINTANILLA, also known as "Firstlast6543," knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, and using any means and facility of interstate and foreign commerce had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, knowing that the images and videos were child pornography.

The child pornography that defendant VIDAL distributed included, but was not limited to, the following videos:

1. A video depicting an adult male penetrating a female child under the age of 12 years old; and
2. A video depicting a prepubescent female child, under the age of 12 years, masturbating.

COUNT THREE

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

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3 On or about August 22, 2020, in San Bernardino County, within  
4 the Central District of California, defendant JOSUE GAMALIEL VIDAL  
5 QUINTANILLA, also known as "Firstlast6543," knowingly distributed  
6 child pornography, as defined in Title 18, United States Code,  
7 Section 2256(8)(A), that had been mailed, and using any means and  
8 facility of interstate and foreign commerce had been shipped and  
9 transported in and affecting interstate and foreign commerce by any  
10 means, including by computer, knowing that the images and videos were  
11 child pornography.

12 The child pornography that defendant VIDAL distributed included,  
13 but was not limited to, a video depicting a prepubescent female child  
14 masturbating.

COUNT FOUR

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

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3 On or about August 22, 2020, in San Bernardino County, within  
4 the Central District of California, defendant JOSUE GAMALIEL VIDAL  
5 QUINTANILLA, also known as "Firstlast6543," knowingly received child  
6 pornography, as defined in Title 18, United States Code, Section  
7 2256(8)(A), that had been mailed, and using any means and facility of  
8 interstate and foreign commerce had been shipped and transported in  
9 and affecting interstate and foreign commerce by any means, including  
10 by computer, knowing that the images and videos were child  
11 pornography.

12 The child pornography that defendant VIDAL received included,  
13 but was not limited to, the following videos:

- 14 1. A video depicting an adult male penetrating a prepubescent  
15 female child; and
- 16 2. A video depicting an adult male digitally penetrating a  
17 prepubescent female child.

COUNT FIVE

[18 U.S.C. §§ 2252A(a)(1), (b)(1), 2(a)]

On or about August 22, 2020, in San Bernardino County, within the Central District of California, defendant JOSUE GAMALIEL VIDAL QUINTANILLA, also known as "Firstlast6543," knowingly transported and shipped, and aided and abetted in transporting and shipping, child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, knowing that the images and videos were child pornography.

The child pornography that defendant VIDAL transported included, but was not limited to, the following videos titled:

1. VID-20170130-WA00110; and
2. VID-20170131-WA0000.

FORFEITURE ALLEGATION

[18 U.S.C. § 2253 and 28 U.S.C. § 2461(c)]

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3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 2253 and Title 28, United States Code,  
7 Section 2461(c), in the event of the defendant's conviction of any of  
8 the offenses set forth in any of Counts One through Five of this  
9 Indictment.

10 2. The defendant, if so convicted, shall forfeit to the United  
11 States of America the following property:

12 (a) All right, title, and interest in any visual depiction  
13 involved in any such offense, or any book, magazine, periodical, film  
14 videotape, or other matter which contains any such visual depiction,  
15 which was produced, transported, mailed, shipped or received and  
16 involved in any such offense;

17 (b) All right, title, and interest in any property, real  
18 or personal, constituting or traceable to gross profits or other  
19 proceeds obtained from such offense;

20 (c) All right, title, and interest in any property, real  
21 or personal, used or intended to be used to commit or to promote the  
22 commission of such offense or any property traceable to such  
23 property; and

24 (d) To the extent such property is not available for  
25 forfeiture, a sum of money equal to the total value of the property  
26 described in subparagraphs (a), (b), and (c).

27 3. Pursuant to Title 21, United States Code, Section 853(p), as  
28 incorporated by Title 18 Section 2253(b), the defendant, if so

1 convicted, shall forfeit substitute property, up to the total value  
 2 of the property described in the preceding paragraph if, as the  
 3 result of any act or omission of the defendant, the property  
 4 described in the preceding paragraph, or any portion thereof: (a)  
 5 cannot be located upon the exercise of due diligence; (b) has been  
 6 transferred, sold to or deposited with a third party; (c) has been  
 7 placed beyond the jurisdiction of the court; (d) has been  
 8 substantially diminished in value; or (e) has been commingled with  
 9 other property that cannot be divided without difficulty.

10 A TRUE BILL

11  
12 /s/

13 \_\_\_\_\_  
Foreperson

14 NICOLA T. HANNA  
United States Attorney

15 *Brandon Fox*

16  
17 BRANDON D. FOX  
Assistant United States Attorney  
18 Chief, Criminal Division

19 JERRY C. YANG  
Assistant United States Attorney  
20 Chief, Riverside Branch Office

21 SONAH LEE  
Assistant United States Attorney  
22 Riverside Branch Office