

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

RAYMON EVERETT HOLMBERG,
a/k/a RAYMON HOLMBERG,
a/k/a RAY HOLMBERG,
a/k/a SEAN EVAN,
a/k/a SEAN EVANS

INDICTMENT

Case No. _____

Violations: 18 U.S.C. §§ 2252A(a)(2)(A),
2252A(b)(1), and 2423(b)

COUNT ONE

Travel with Intent to Engage in Illicit Sexual Activity

The Grand Jury Charges:

From on or about June 24, 2011, to on or about November 1, 2016, in the District of North Dakota, and elsewhere,

RAYMON EVERETT HOLMBERG, a/k/a RAYMON HOLMBERG,
a/k/a RAY HOLMBERG, a/k/a SEAN EVAN, a/k/a SEAN EVANS,
a United States citizen, did travel in interstate and foreign commerce from the United States, that is, North Dakota, to Prague, Czech Republic, for the purpose of engaging in any illicit sexual conduct, to wit, any commercial sex act, as defined in Title 18, United States Code, Section 1591, with a person under 18 years of age;

In violation of Title 18, United States Code, Section 2423(b).

COUNT TWO

Receipt and Attempted Receipt of Child Pornography

The Grand Jury Further Charges:

On or about November 24, 2012, and continuing until on or about March 4, 2013,
in the District of North Dakota, and elsewhere,

RAYMON EVERETT HOLMBERG, a/k/a RAYMON HOLMBERG,
a/k/a RAY HOLMBERG, a/k/a SEAN EVAN, a/k/a SEAN EVANS,
did knowingly receive, and did knowingly attempt to receive, child pornography, as
defined in Title 18, United States Code, Section 2256(8)(A), that had been shipped and
transported using any means and facility of interstate and foreign commerce, and in and
affecting interstate and foreign commerce by any means, including by computer;

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

FORFEITURE ALLEGATION

The Grand Jury Further Finds Probable Cause That:

Upon conviction of violating Title 18, United States Code, Sections 2252A(a)(2)(A), 2252A(b)(1), and 2423(b) as charged in Counts 1 and 2 of this Indictment,

RAYMON EVERETT HOLMBERG, a/k/a RAYMON HOLMBERG, a/k/a RAY HOLMBERG, a/k/a SEAN EVAN, a/k/a SEAN EVANS, shall forfeit to the United States, any property, real or personal, that was involved in, used, and intended to be used to commit and to facilitate the commission of such violations and property traceable to such property and any property, real or personal, constituting or derived from, any proceeds obtained, directly and indirectly, as a result of such violations and any property traceable to such property, including, but not limited to, the following:

- One White Apple iPad with IMEI 355819085093783.
- Samsung SM-G988U1 with IMEI 355422421183390.

By virtue of commission of the felony offenses as charged in this Indictment, all right, title, and interest in the above-described property is vested in the United States and is hereby forfeited to the United States, pursuant to Title 18, United States Code, Section 1594(d).

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Jennifer Puhl
JENNIFER PUHL
First Assistant United States Attorney
Acting Under Authority Conferred by 28 U.S.C. § 515

JKP/vt