

FILED
IN COURT
CHARLOTTE, N. C.

SEP 29 2006

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

U. S. DISTRICT COURT
W. DIST. OF N. C.

UNITED STATES OF AMERICA)
)
)
v.)
)
)
MARQUES DRAKEFORD BYNUM)
aka "markie_zkidluv6")
aka "keyidol26@netzero.net")

DOCKET NO. 3:06 CR 401-W

BILL OF INDICTMENT

Violation:
18 U.S.C. § 2252A(a)(1) and (b)(1)
18 U.S.C. § 2252A(a)(5)

THE GRAND JURY CHARGES:

COUNT ONE

On or about July 8, 2003, in the Western District of North Carolina and elsewhere,

MARQUES DRAKEFORD BYNUM,
aka markie_zkidluv6, aka keyidol26@netzero.net

did knowingly transport and ship in interstate and foreign commerce by means of a computer,
child pornography as defined in 18 U.S.C. 2256(8)(A), that is computer files entitled:
"2lezzie01.jpg," "2lezzie03.jpg", "2lezzie04.jpg." and "2lezzie08.jpg."

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

COUNT TWO

On or about July 10, 2003, in the Western District of North Carolina and elsewhere,

MARQUES DRAKEFORD BYNUM,
aka markie_zkidluv6, aka keyidol26@netzero.net

did knowingly transport and ship in interstate and foreign commerce by means of a computer,
child pornography as defined in 18 U.S.C. 2256(8)(A), that is computer files entitled: "kg-11-
19.jpg," "kg12-13.jpg," "aug02_00.jpg," "kg11-20.jpg."

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

COUNT THREE

On or about September 22, 2003, in the Western District of North Carolina and elsewhere,

MARQUES DRAKEFORD BYNUM,
aka markie_zkidluv6, aka keyidol26@netzero.net

did knowingly transport and ship in interstate and foreign commerce by means of a computer, child pornography as defined in 18 U.S.C. 2256(8)(A), that is a computer file entitled "4-yo-refusing- cumshot-wsound[1].mpg."

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

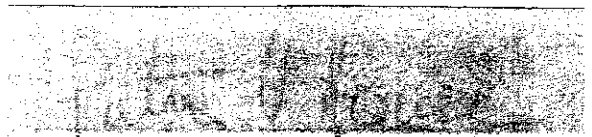
COUNT FOUR

On or about December 10, 2003, in the Western District of North Carolina and elsewhere,

MARQUES DRAKEFORD BYNUM,
aka markie_zkidluv6, aka keyidol26@netzero.net

did knowingly possess material that contained images of child pornography, as defined in 18 U.S.C. 2256(8)(A), that had been mailed, and shipped and transported in interstate and foreign commerce by any means, including by computer, and which were produced using materials that had been mailed, and shipped and transported in interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(5).



Foreperson

GRETCHEN C.F. SHAPPERT
United States Attorney

A handwritten signature in cursive script that reads "KimLani M. Ford". The signature is written in dark ink and is positioned above a horizontal line.

KIMLANI M. FORD
Assistant United States Attorney