

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

BRUCE H. NIGGEMANN

No.

Violations: Title 18, United States
Code, Sections 2252A(a)(2)(A)
and 2252A(a)(5)(B)

COUNT ONE

The SPECIAL FEBRUARY 2014 GRAND JURY charges:

On or about July 25, 2014, at West Dundee, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRUCE H. NIGGEMANN,

defendant herein, knowingly received using a means and facility of interstate commerce, namely, the Internet, child pornography, as that term is defined in Title 18, United States Code, Section 2256(8)(A), namely, a video file titled "pthc 2010 -- [k] -- dumping a cum load in her mouth -- 00m21s," which video file had been shipped and transported in and affecting interstate commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT TWO

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about August 12, 2014, at West Dundee, in the Northern District of Illinois, Eastern Division,

BRUCE H. NIGGEMANN,

defendant herein, knowingly possessed material, namely, (1) a HP Pavilion desktop computer bearing serial number MXX21606C3; (2) a Seagate hard drive bearing serial number 6VPJP49W; (3) a HP Pavilion laptop model number dv7 bearing serial number ZCE2010KWQ; and (4) a Hitachi hard drive bearing serial number J2540054DB45ME; which contained an image of child pornography, as that term is defined in Title 18, United States Code, Section 2256(8)(A), such image having been mailed, shipped and transported using any means and facility of interstate or foreign commerce and in and affecting interstate commerce by any means, including by computer, and such image having been produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means;

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

FORFEITURE ALLEGATION

The SPECIAL FEBRUARY 2014 GRAND JURY further alleges:

1. The allegations of this Indictment are realleged and fully incorporated herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253.

2. As a result of his violations of Title 18, United States Code, Sections 2252A,

BRUCE H. NIGGEMANN,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all right, title and interest defendant has in any matter which contains visual depictions described in Title 18, United States Code, Section 2252A, 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 said violations.

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Section 2253 include, but are not limited to:

(1) a HP Pavilion desktop computer bearing serial number MXX21606C3;

(2) a Seagate hard drive bearing serial number 6VPJP49W;

(3) a HP Pavilion laptop model number dv7 bearing serial number ZCE2010KWQ;

(4) a Hitachi hard drive bearing serial number J2540054DB45ME, and

(5) images and videos seized from defendant's residence on August 12, 2014.

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

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY