

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	No.	14 CR 237
)		
v.)	Violations:	Title 18, United States Code,
)		Sections 2252A(a)(1),
KEITH FARNHAM)		2252A(a)(2)(A), and
)		2252A(a)(5)(B)

COUNT ONE

The SPECIAL JULY 2013 GRAND JURY charges:

On or about August 13, 2013, at Elgin, in the Northern District of Illinois, Eastern Division,

KEITH FARNHAM,

defendant herein, using a means and facility of interstate and foreign commerce, knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely, a computer file titled (1) "Pia 8 yo Daddy fondles her pussy.avi" and (2) "Nena 9 yo Nice long.avi," which file had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer;

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

COUNT TWO

The SPECIAL JULY 2013 GRAND JURY further charges:

On or about November 23, 2013, at Elgin, in the Northern District of Illinois, Eastern Division,

KEITH FARNHAM,

defendant herein, knowingly transported and caused to be transported child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely, a computer file titled (1) "13 yo mouthful.flv" and (2) "17.3gp," using a 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, Section 2252A(a)(1).

COUNT THREE

The SPECIAL JULY 2013 GRAND JURY further charges:

On or about November 25, 2013, at Elgin, in the Northern District of Illinois, Eastern Division,

KEITH FARNHAM,

defendant herein, knowingly transported and caused to be transported child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely, a computer file titled (1) "SSPX0060.3g2" and (2) "2010_2Bpthc_Bbabyshivid_2Bfrifam_2BPussyPlay03_2528 withsound_2529.avi," using a 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, Section 2252A(a)(1).

COUNT FOUR

THE SPECIAL JULY 2013 GRAND JURY further charges:

On or about March 13, 2014, at Elgin, in the Northern District of Illinois, Eastern Division,

KEITH FARNHAM,

defendant herein, knowingly possessed material, namely, (1) a Seagate, 320 GB hard drive, model Momentus 5400.6, bearing serial number 6VDHZZSG; (2) a Dell Dimension 9200 computer, which contained a Seagate, 160 GB hard drive, model Barracuda 7200.9, bearing serial number 5LS8KGSX; (3) an HP Compaq Pro 6305 computer, which contained a Seagate, 500 GB hard drive, model Barracuda, bearing serial number Z3TJJZMG; and (4) a HP Compaq Elite 8300 computer, which contained a Western Digital, 500 GB hard drive, model WD5000AAKX-60U6AAO, bearing serial number WCC2EEN50884, which contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A) that involved a prepubescent minor or a minor who had not obtained 12 years of age, such image having been shipped and transported using any means and facility of interstate and foreign commerce, and such image having been produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer;

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

FORFEITURE ALLEGATION

The SPECIAL JULY 2013 GRAND JURY alleges:

1. The allegations contained in Counts One through Four are incorporated here for the purpose of alleging forfeiture, pursuant to Title 18, United States Code, Section 2253.

2. As a result of his violations of Title 18, United States Code, Sections 2252A(a)(1), 2252A(a)(2)(A), and 2252A(a)(5)(B), as alleged in the foregoing Indictment,

KEITH FARNHAM,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all right, title, and interest that he may have in any visual depictions described in Title 18, United States Code, Sections 2251 and 2252A, as well as any property, real or personal, used or intended to be used to commit or promote the commission of such offenses, as well as any property traceable to such property.

3. The interests of defendant subject to forfeiture include, but are not limited to, the following item seized at defendant's residence on or about March 13, 2014:

- a. a Seagate, 320 GB hard drive, model Momentus 5400.6, bearing serial number 6VDHZZSG.

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

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY