



**COUNT TWO**

The SPECIAL MARCH 2013 GRAND JURY further charges:

On or about August 14, 2012, at Will County, in the Northern District of Illinois,  
Eastern Division,

JOHN GABRIEL,

defendant herein, knowingly altered, destroyed, mutilated, and concealed a record and tangible object, namely, an HP Pavilion a6000 desktop computer, serial number MXX8050HHB, and data contained thereon, with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the United States, and in relation to and contemplation of such a matter;

In violation of Title 18, United States Code, Section 1519.

**FORFEITURE ALLEGATION**

The SPECIAL MARCH 2013 GRAND JURY alleges:

1. The allegations in Count One are incorporated here for purposes of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

2. As a result of his violation of Title 18, United States Code, Section 2251(a), as alleged in Count One,

JOHN GABRIEL,

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 visual depictions described in Title 18, United States Code, Sections 2251, and any and all property used and intended to be used to commit or to promote the commission of this violation, as well as any property traceable to such violation.

3. The interests of defendant subject to forfeiture include, but are not limited to, the following items seized at defendant's residence on or about August 14, 2012:

a. HP Pavilion a6000 desktop computer, serial number MXX8050HHB; and

b. Western Digital Hard Drive, serial number WCAS83058850.

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

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY