

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

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CAROL L. MICHEL
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR POSSESSION OF MATERIALS INVOLVING THE
SEXUAL EXPLOITATION OF MINORS AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA	*	CRIMINAL NO.:	21-43
v.	*	SECTION:	SECT.F MAG.3
DOMINIC ROMANO	*	VIOLATIONS:	18 U.S.C. § 2252(a)(4)(B) 18 U.S.C. § 2252(b)(2) 18 U.S.C. § 2253
	*		
	*		
	*		

The Grand Jury charges that:

COUNT 1 - POSSESSION OF CHILD SEXUAL ABUSE MATERIAL

Beginning at a time unknown, but not later than on or about April 22, 2019, and continuing until on or about May 7, 2020, within the Eastern District of Louisiana, the defendant, **DOMINIC ROMANO**, did knowingly possess and attempt to possess one or more matters containing visual depictions that had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and which visual depictions were produced using materials which had been mailed and so shipped and transported, by any means, including by computer; and the production of such visual depictions involved the

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use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such visual depictions were of such conduct, to wit: digital videos and images depicting prepubescent minors and minors who had not attained twelve (12) years of age engaged in sexually explicit conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

NOTICE OF FORFEITURE

1. The allegations of Count 1 of this Indictment are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America.

2. As a result of the offense alleged in Count 1, defendant, **DOMINIC ROMANO**, shall forfeit to the United States all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and/or any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, in violation of Title 18, United States Code, Sections 2252(a)(2) and 2253:

One (1) black Acer laptop, bearing model number N17C1, and bearing serial number NHQ2RAA01173604BCF3400;

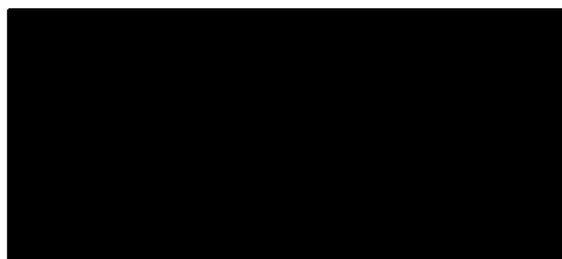
One (1) black home-built Cougar computer tower containing one (1) Toshiba hard drive and one (1) Western Digital hard drive.

3. If any of the above-described property, as a result of any act or omission of the defendant:

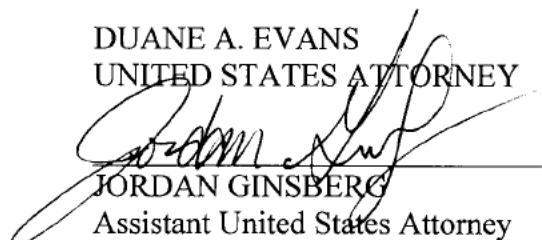
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.



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New Orleans, Louisiana
April 9, 2021