

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

| | | |
|---------------------------|---|---------------------------|
| UNITED STATES OF AMERICA, |) | CL 25-67 PJS/SGE |
| |) | INDICTMENT |
| Plaintiff, |) | 18 U.S.C. § 1466A(a)(1) |
| |) | 18 U.S.C. § 2252(a)(2) |
| v. |) | 18 U.S.C. § 2251(a)(4)(B) |
| |) | 18 U.S.C. § 2251(b)(1) |
| WILLIAM MICHAEL HASLACH, |) | 18 U.S.C. § 2251(b)(2) |
| |) | 18 U.S.C. § 2253(a) |
| Defendant. |) | |

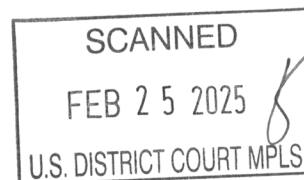
THE UNITED STATES GRAND JURY CHARGES THAT:

INTRODUCTION

At times relevant to the Indictment:

1. Defendant WILLIAM MICHAEL HASLACH resided in the State and District of Minnesota. He worked as a lunch monitor and traffic safety guard in SCHOOL DISTRICT 1, including primarily at an elementary school, from approximately August of 2021 until January of 2025.

2. Defendant HASLACH also worked first as a paraprofessional and then as a youth summer programs assistant in SCHOOL DISTRICT 2 from approximately February of 2021 until August of 2024. Defendant HASLACH was responsible for providing summer childcare to school aged children.



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3. Defendant HASLACH created, maintained, and controlled several internet-based accounts for email, digital storage, file sharing, and chatting, among other services.

4. From at least on or about August of 2021 until at least on or about January of 2025, Defendant HASLACH used his position as a lunch monitor, traffic guard, and summer youth programs assistant to obtain images of minors with whom he had regular contact.

5. Defendant HASLACH surreptitiously used the images he obtained to produce computer generated depictions of those minors engaging in sexually explicit conduct. These images are obscene and display, for example, Minor Victim 1 engaging in graphic or simulated lascivious exhibition of the anus, genitals, and pubic area.

6. Defendant HASLACH stored obscene visual representations of child sex abuse involving at least Minor Victim 1 on several electronic storage media, including a cloud-based file hosting service known as Dropbox.

7. Victim 1 is a minor who resided in the State and District of Minnesota.

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COUNTS 1 – 5
(Receipt of Child Pornography)

Between on December 4, 2024, and on or about January 13, 2025, in the State and District of Minnesota and elsewhere, the defendant,

WILLIAM MICHAEL HASLACH,

did knowingly receive visual depictions using any means and facility of interstate and foreign commerce or that had been mailed, shipped, and transported in or affecting interstate and foreign commerce, including by cellular device and computer, where the production of such depictions involved the use of minors engaging in sexually explicit conduct, and such visual depictions are of such conduct, including, but not limited to the following digital files, to wit:

| Count | Date | File Name |
|-------|-----------|--|
| 1 | 1/13/2025 | 0f7bbb90-d12f-11ef-a2db-bb460ce5fec1.mp4 |
| 2 | 1/7/2025 | 0e244fc0-cd3b-11ef-94cd-cd22ed7451e2.mp4 |
| 3 | 1/7/2025 | 0a587ab0-cd3b-11ef-838a-3f1cd86a0f87.mp4 |
| 4 | 1/7/2025 | 07118d10-cd3b-11ef-b550-2b7b6560e5b7.mp4 |
| 5 | 12/4/2024 | 06582420-b28c-11ef-a298-1fab7ee3a156.mp4 |

all in violation of Title 18, United States Code, Section 2252(a)(2) and 2252(b)(1).

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COUNTS 6 – 10

(Possession of Child Pornography)

On or about January 17, 2025, in the State and District of Minnesota and elsewhere, the defendant,

WILLIAM MICHAEL HASLACH,

did knowingly possess one or more visual depictions that had been mailed, shipped, and transported using a means and facility of interstate commerce, and in or affecting interstate and foreign commerce, including by cellular device and computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to the following digital files, to wit:

| Count | File Name |
|-------|---|
| 6 | 05e2954b-b037-11ef-8db3-b9bedaaaff2b0.mp4 |
| 7 | 0d40e9d0-b2fe-11ef-8d23-bff81fce2fce.mp4 |
| 8 | 0eb90400-b1c3-11ef-bd3b-69d3e431e438.mp4 |
| 9 | 05e2954f-b037-11ef-8db3-b9bedaaaff2b0.mp4 |
| 10 | 05e29540-b037-11ef-8db3-b9bedaaaff2b0.mp4 |

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

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COUNT 11

(Production of an Obscene Visual Representation of Child Sexual Abuse)

On or about January 17, 2025, in the State and District of Minnesota and elsewhere, the defendant,

WILLIAM MICHAEL HASLACH,

did knowingly produce, distribute, receive, and possess with the intent to distribute, a visual depiction of any kind, including a drawing that depicts a minor engaging in sexually explicit conduct and is obscene, to wit: a drawing of Minor Victim 1 engaged in the lascivious exhibition of the genitals and pubic area and this visual depiction had been mailed, and shipped and transported in interstate and foreign commerce by any means, including by computer, and was produced using materials that have been mailed, and that have been shipped and transported in interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Section 1466A(a)(1).

FORFEITURE ALLEGATIONS

All Counts of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

Upon conviction of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

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(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, data disc, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses;

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property. The property subject to forfeiture upon conviction of any of Counts 1-11 includes, but is not limited to the following property:

- a) A HP laptop computer with Serial Number 5CD23866N0;
- b) A HP Notebook laptop computer with Serial Number CND7021YLW;
- c) An Apple iPhone 8 Plus with Serial Number F17WGMWBJCLY;
- d) An Apple Iphone 14 Plus with IMEI Number 356295371885100;
- e) A Toshiba 2 GB storage drive with Serial Number 1123WH4107G;
- f) A Sony PSP with Serial Number Hu0217751;
- g) An Apple iPhone with Serial Number 358823052085431;
- h) An Apple iPod 8 GB with Serial Number C3RH64TCDT75;
- i) An Apple iPhone, model A1387;

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- j) A Motorola flip phone, model V170;
- k) A Western Digital My Passport storage drive with Serial Number WXC2D33PAS3S;
- l) A Western Digital My Passport storage drive with Serial Number WX72A91410F5;
- m) An Ativa 4 GB USB storage device;
- n) A PNY 8 GB USB storage device;
- o) An Ativa 4 GB USB storage device with Model Number 4GBCA-3609; and
- p) A HP HQ-TRE laptop computer with Serial Number CND5304YBV.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 1028(g), and 2253(b).

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A TRUE BILL

ACTING UNITED STATES ATTORNEY

FOREPERSON