

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

- 18 U.S.C. § 2252(a)(2) – Receipt of Child Pornography ☐ Petty
- 18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography ☐ Minor
- ☐ Misdemeanor
- ☒ Felony

PENALTY:

See attached.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

DOMINIC J. VANNUCCI

DISTRICT COURT NUMBER

CR 25 0223 JST**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1) ☐ If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

FILED**JUL 31 2025****IS IN CUSTODY**CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

- 4) ☐ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☒ Awaiting trial on other charges

 If answer to (6) is "Yes", show name of institution
 Contra Costa County Jail

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed
**DATE OF
ARREST**

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Homeland Security Investigations (HSI)

☒ person is awaiting trial in another Federal or State Court, give name of court

Contra Costa County Superior Court

☐ this person/proceeding is transferred from another district per (circle one) FRCp 20, 21, or 40. Show District
☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:
SHOW
DOCKET NO.☐ U.S. ATTORNEY ☐ DEFENSE
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

Name and Office of Person

Furnishing Information on this form CRAIG H. MISSAKIAN

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) KELLY I. VOLKAR

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: No Bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

Date/Time:

Before Judge:

Comments:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

PENALTY SHEET FOR DOMINIC JAMES VANNUCCI

Count 1: 18 U.S.C. § 2252(a)(2) – Receipt of Child Pornography

- Mandatory minimum of 5 years' imprisonment (18 U.S.C. § 2252(b)(1));
- Maximum of 20 years' imprisonment (18 U.S.C. § 2252(b)(1));
- Maximum \$250,000 fine (18 U.S.C. § 3571);
- Between five years and lifetime supervised release (18 U.S.C. § 3583(k));
- \$5,100 special assessment (typical \$100 special assessment under 18 U.S.C. § 3013 and an additional \$5,000 special assessment under 18 U.S.C. § 3014(a)(3) because the crime relates to sexual exploitation of children).

Count 2: 18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography

- Maximum 20 years' imprisonment (18 U.S.C. § 2252(b)(2))
- Maximum \$250,000 fine (18 U.S.C. § 3571);
- Between five years and lifetime supervised release (18 U.S.C. § 3583(k));
- \$5,100 special assessment (typical \$100 special assessment under 18 U.S.C. § 3013 and an additional \$5,000 special assessment under 18 U.S.C. § 3014(a)(3) because the crime relates to sexual exploitation of children).

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

CR 25 0223

UNITED STATES OF AMERICA,
V.

JST

DOMINIC J. VANNUCCI,

FILED

JUL 31 2025

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

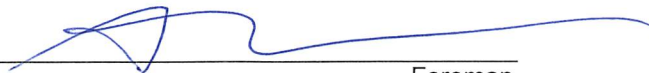
DEFENDANT(S).

SEALED BY ORDER
OF THE COURT

INDICTMENT

18 U.S.C. § 2252(a)(2) and (b) – Receipt of Child Pornography;
18 U.S.C. § 2252(a)(4)(B) and (b)(2) – Possession of Child Pornography;
18 U.S.C. § 2253(a) – Criminal Forfeiture

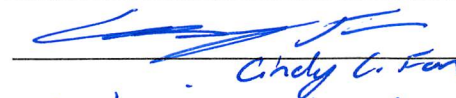
A true bill.



Foreman

Filed in open court this 31st day of

July, 2025



Clerk



Bail, \$ No bail No Process Warrant

Hon. Kandis A. Westmore, U.S. Magistrate Judge

1 CRAIG H. MISSAKIAN (CABN 125202)
2 United States Attorney

FILED

JUL 31 2025

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

**SEALED BY ORDER
OF THE COURT**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 DOMINIC J. VANNUCCI,

15 Defendant.

) CASE NO.

CR 25 0223 JST

) VIOLATIONS:

) 18 U.S.C. § 2252(a)(2) and (b) – Receipt of Child
Pornography;

) 18 U.S.C. § 2252(a)(4)(B) and (b)(2) – Possession of
Child Pornography;

) 18 U.S.C. § 2253(a) – Criminal Forfeiture

) OAKLAND VENUE
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19 INDICTMENT

20 The Grand Jury charges:

21 COUNT ONE: (18 U.S.C. §§ 2252(a)(2) and (b) – Receipt of Child Pornography)

22 On or about May 1, 2025, in the Northern District of California, the defendant,

23 DOMINIC J. VANNUCCI,

24 did knowingly receive a visual depiction, which has been shipped and transported using a means and
25 facility of interstate and foreign commerce, or which has been mailed and has been shipped and
26 transported in and affecting interstate and foreign commerce, or which was produced using materials, or
27 which has been mailed or so shipped or transported, by any means including by computer, and the
28 production of such visual depiction involved the use of a minor engaging in sexually explicit conduct,

INDICTMENT

1 and which visual depiction was of such conduct, all in violation of Title 18, United States Code,
2 Sections 2252(a)(2) and (b).

3 COUNT TWO: (18 U.S.C. §§ 2252(a)(4)(B) and (b)(2) – Possession of Child Pornography)

4 Beginning on a date unknown, but continuing through on or about June 4, 2025, in the Northern
5 District of California, the defendant,

6 DOMINIC J. VANNUCCI,

7 did knowingly possess matter which contained at least one visual depiction that was produced using
8 materials that had been mailed, shipped, and transported using any means and facility of interstate and
9 foreign commerce, including by computer, the production of which visual depiction involved the use of
10 a prepubescent minor engaging in sexually explicit conduct, which visual depiction was of such conduct,
11 all in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).

12 FORFEITURE ALLEGATION: (18 U.S.C. § 2253(a))

13 The allegations contained in this Indictment are re-alleged and incorporated by reference for the
14 purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

15 Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offenses set forth
16 in this Indictment, the defendant,

17 DOMINIC J. VANNUCCI,

18 shall forfeit to the United States of America:

- 19 a. any visual depiction described in Title 18, United States Code, Sections 2251 or
20 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter
21 which contains any such visual depiction, which was produced, transported, mailed,
22 shipped or received in violation of Title 18, United States Code, Chapter 110;
- 23 b. any property, real or personal, constituting or traceable to gross profits or other
24 proceeds obtained from the offenses; and
- 25 c. any property, real or personal, used or intended to be used to commit or to promote
26 the commission of the offenses.

27 The property to be forfeited includes, but is not limited to:
28

- a. one Apple iPhone 15 (serial no. JX7KK25C9N);
- b. one NZXT Desktop Computer (with no serial number);
- c. one Apple Macbook (serial no. C02WW1C6JHC9);
- d. one ONN USB 59GB thumbdrive;
- e. one Easy Store USB 64GB thumbdrive (serial no. SDUSBES4-064G-A46
BN191057934W)
- f. one SanDisk USB 2TB thumbdrive (serial no. SDSSDE81-2T00)
- g. one Orico solid state 1TB drive (serial no. 2E3X-60BT1X)
- h. one Lexar USB thumbdrive (serial no. LJDS73-8GB-133-108 A 33608-8GBGA
0712S); and
- i. one Lexar USB thumbdrive (serial no. LJDTT16G-000-328 E 34137-16GBGA
2414S).

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

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- 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 divided without
difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b)
and Title 28, United States Code, Section 2461(c).

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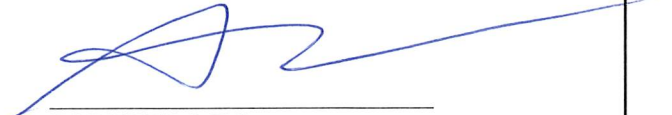
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1 All pursuant to Title 18, United States Code, Section 2253, Title 28, United States Code,
2 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

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4 DATED: July 31, 2025

A TRUE BILL.

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7 _____
FOREPERSON

8 CRAIG H. MISSAKIAN
9 United States Attorney

10 /s/ Kelly Volkar
11 KELLY I. VOLKAR
12 Assistant United States Attorney
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