

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)
)
) No. _____
)
) Violations: Title 18, United
MICHAEL L. CHAPARRO) States Code, Sections 2252A
) (a)(1) and (a)(5)(B)

COUNT ONE

The NOVEMBER 2015 GRAND JURY charges:

On or about August 7, 2014, at McHenry, in the Northern District of Illinois, Western Division, and elsewhere,

MICHAEL L. CHAPARRO,

defendant herein, using a means and facility of interstate and foreign commerce and in and affecting interstate commerce by any means, namely, the Internet, knowingly transported and caused to be transported child pornography, as that term is defined in Title 18, United States Code, Section 2256(8)(A), namely, computer files titled, “0yo-g-07-01”, “1177670455587”, “1262564812258”, “db76ff3510d2”, “1180839238449”, and “Pedo Baby 03-2yo Photos 56”;

In violation of Title 18, United States Code, Section 2252A(a)(1).

COUNT TWO

The NOVEMBER 2015 GRAND JURY further charges:

On or about November 24, 2014, at McHenry, in the Northern District of Illinois, Western Division,

MICHAEL L. CHAPARRO,

defendant herein, knowingly accessed with intent to view material that contained an image of child pornography as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor and a minor who had not attained 12 years of age, such image having been mailed, shipped, and transported using any means and facility of interstate or foreign commerce and such image having been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, namely LG cellular telephone model LS990 with serial number 407KPBF0086357;

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

COUNT THREE

The NOVEMBER 2015 GRAND JURY further charges:

On or about July 30, 2013, at McHenry, in the Northern District of Illinois, Western Division,

MICHAEL L. CHAPARRO,

defendant herein, knowingly accessed with intent to view material that contained an image of child pornography as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor and a minor who had not attained 12 years of age, such image having been mailed, shipped, and transported using any means and facility of interstate or foreign commerce and such image having been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, namely a Seagate Barracuda hard drive with serial number 6RYK3JD7;

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

FORFEITURE ALLEGATION

The NOVEMBER 2015 GRAND JURY further alleges:

1. The allegations contained in this Indictment are realleged and incorporated by reference as if fully restated here for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253.

2. As a result of his violations of Title 18, United States Code, Sections 2252A(a)(1), and 2252A(a)(5)(B),

MICHAEL L. CHAPARRO,

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 Title 18, United States Code, Section 2252A, and any and all property used and intended to be used to commit or to promote the commission of these violations, as well as any property traceable to such violations.

3. The interests of the defendant subject to forfeiture include, but are not limited to, the following items seized at defendant's residence on or about December 2, 2014:

a. LG cellular telephone model LS990 with serial number 407KPBF0086357, and

b. Seagate Barracuda hard drive with serial number 6RYK3JD7;

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

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY