

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)
) No.
 v.)
) Violations: Title 18, United States
) Code, Sections 2251(a), 2252A(a)(1),
 GRANT WOJAHN) and 2252A(a)(5)(B)

COUNT ONE

The NOVEMBER 2015 GRAND JURY charges:

On or about March 20, 2015, at Loves Park, in the Northern District of Illinois, Western Division, and elsewhere,

GRANT WOJAHN,

defendant herein, did knowingly employ, use, persuade, induce, and entice a minor, namely Victim B, to engage in sexually explicit conduct, namely the lascivious display of the minor's genitalia, for the purpose of producing a visual depiction of such conduct, and attempted to do so, which visual depiction defendant knew and had reason to know would be transported and transmitted using a means and facility of interstate commerce and in and affecting interstate commerce, and which visual depiction was actually transported and transmitted using a means and facility of interstate commerce and in and affecting interstate commerce;

In violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

The NOVEMBER 2015 GRAND JURY further charges:

On or about March 25, 2015, at Loves Park, in the Northern District of Illinois, Western Division, and elsewhere,

GRANT WOJAHN,

defendant herein, knowingly transported and caused to be transported child pornography, as that term is defined in Title 18, United States Code, Section 2256(8)(A), including a computer file titled, 11074784_1635679739987357_1810834577_n.jpg, using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer;

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

COUNT THREE

The NOVEMBER 2015 GRAND JURY further charges:

On or about September 1, 2015, at Loves Park, in the Northern District of Illinois, Western Division,

GRANT WOJAHN,

defendant herein, knowingly possessed material, namely, a silver USB 2 gigabyte storage device, that contained an image of child pornography as defined in Title 18, United States Code, Section 2256(8)(A), involving 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 mailed, shipped, and transported in and affecting interstate and foreign commerce by any means;

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

COUNT FOUR

The NOVEMBER 2015 GRAND JURY further charges:

On or about December 5, 2015, at Loves Park, in the Northern District of Illinois, Western Division,

GRANT WOJAHN,

defendant herein, knowingly possessed material, namely, a LG cellphone with serial number 5725574, that contained an image of child pornography as defined in Title 18, United States Code, Section 2256(8)(A), 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 mailed, shipped, and transported in and affecting interstate and foreign commerce by any means;

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 2251(a) and 2252A,

GRANT WOJAHN,

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:

a. Apple iPhone 5 with serial number F19JW078F8H2, including a Verizon Nano SIM card with Integrated Circuit Card Identifier 89148000000515288422;

b. Hitachi hard drive with serial number
100819PCK304GKG5DL0J;

c. silver USB 2 gigabyte storage device;

d. Casio cellphone with serial number CVJZ0832142,
including a SanDisk 8 gigabyte micro SD card; and

e. LG cellphone with serial number 5725574.

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

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY