

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

EMAD SAGHIR

Case No.

Violations: Title 18, United States
Code, Sections 2252A(a)(1) and
(b)(1), 2252A(a)(5)(B) and (b)(2)

COUNT ONE

The SPECIAL APRIL 2024 GRAND JURY charges:

On or about September 16, 2023, at Evanston, in the Northern District of Illinois, Eastern Division, and elsewhere,

EMAD SAGHIR,

defendant herein, did knowingly transport and cause to be transported child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely a file entitled, “d0c985ba8367ba2687f11c3293e59ac4-22 (1) (1).mp4,” 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) and (b)(1).

COUNT TWO

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about October 8, 2023, at Evanston, in the Northern District of Illinois, Eastern Division, and elsewhere,

EMAD SAGHIR,

defendant herein, did knowingly transport and cause to be transported child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely a file entitled, “6f8df7aa89566cf00040a9d9ab95c6eb-feb10-low.mp4,” a file entitled, “df0f452c8b52b031c8b6b4c8f5942876-nov-0000.mp4,” a file entitled, “a46a8972533f3472950ac43e234dd3af-feb19-low.mp4,” and a file entitled, “e592c00abaf3f7fd3daf37fd9c7eb99b-nov-0008-low.mp4,” 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) and (b)(1).

COUNT THREE

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about October 8, 2023, at Evanston, in the Northern District of Illinois, Eastern Division, and elsewhere,

EMAD SAGHIR,

defendant herein, did knowingly transport and cause to be transported child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely a file entitled, “29192c7639f6c9b29b91ab315dcbe97b-011-low.mp4,” 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) and (b)(1).

COUNT FOUR

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about November 29, 2023, at Evanston, in the Northern District of Illinois, Eastern Division, and elsewhere,

EMAD SAGHIR,

defendant herein, did knowingly transport and cause to be transported child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely a file entitled, “8144084217da17e2e99ae1f376c2015e-vd_4_.mp4,” 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) and (b)(1).

COUNT FIVE

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about November 30, 2023, at Evanston, in the Northern District of Illinois, Eastern Division, and elsewhere,

EMAD SAGHIR,

defendant herein, did knowingly transport and cause to be transported child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely a file entitled, “541808fae61bc0e29efd86f0ba4592-vd_6_.mp4,” 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) and (b)(1).

COUNT SIX

The SPECIAL APRIL 2024 GRAND JURY further charges:

On or about November 30, 2023, at Evanston, in the Northern District of Illinois, Eastern Division, and elsewhere,

EMAD SAGHIR,

defendant herein, knowingly possessed material, namely, a Google LLC account associated with the email address “esaghir@gmail.com,” that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), involving a prepubescent minor and a minor who had not attained 12 years of age, such image having been shipped and transported using any means and facility of interstate and foreign commerce, including by computer, and such image having been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION

The SPECIAL APRIL 2024 GRAND JURY further alleges:

Upon conviction of an offense in violation of Title 18, United States Code, Section 2252A, as set forth in this Indictment, defendant shall forfeit to the United States of America any matter which contains visual depictions described in Title 18, United States Code, Section 2252A; any property constituting and traceable to gross profits and other proceeds obtained from such offense; and any property used and intended to be used to commit and to promote the commission of such offense, and any property traceable to such property, as provided by Title 18, United States Code, Section 2253(a).

A TRUE BILL:

FOREPERSON

Signed by Christine O'Neill on behalf of the
ACTING UNITED STATES ATTORNEY