



**COUNT TWO**

The MAY 2018 GRAND JURY charges:

On or about September 25, 2017, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

DONOVAN HEIDENREICH,

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

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

**COUNT THREE**

The MAY 2018 GRAND JURY further charges:

On or about November 28, 2017, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

DONOVAN HEIDENREICH,

defendant herein, knowingly possessed material, namely, a Dell laptop computer with serial number J5B9732, 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, and such images 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, Sections 2252A(a)(5)(B) and 2252A(b)(2).

**FORFEITURE ALLEGATION**

The MAY 2018 GRAND JURY further alleges:

1. The allegations in Counts One, Two, and Three of this Indictment are realleged here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

2. As a result of his violations of Title 18, United States Code, Section 2252A, as alleged in the foregoing Indictment,

DONOVAN HEIDENREICH,

defendant herein, shall forfeit to the United States any and all right, title and interest defendant has in any matter that contains visual depictions described in Title 18, United States Code, Section 2252A; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the said violations, including, but not limited to, a Dell laptop computer with serial number J5B9732;

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

A TRUE BILL:

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FOREPERSON

\_\_\_\_\_  
UNITED STATES ATTORNEY