# JUL 1 6 2020

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

THOMAS G. BRUTON CLERK, U.S. DISTRICT COURT

## UNITED STATES OF AMERICA

v.

JOSEPH WERWATH

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

# JUDGE KENDALL

#### The SPECIAL MAY 2019 GRAND JURY charges:

On or about June 17, 2020, at Chicago, in the Northern District of Illinois, Eastern Division,

#### JOSEPH WERWATH,

knowingly possessed material, namely, a Google Pixel 2, serial number HT7BV1A03980, 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 obtained 12 years of age, such image having been shipped and transported using any means or facility of interstate or foreign commerce and in or affecting interstate commerce by any means, including by computer; and such image having been produced using materials that have been 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 SPECIAL MAY 2019 GRAND JURY further alleges:

1. 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 property that contains visual depictions described in Title 18, United States Code, Section 2252A, and any and all property used and intended to be used in any manner or part to commit the violation set forth in the Indictment, as provided in Title 18, United States Code, Section 2253.

The property to be forfeited includes, but is not limited to, a Google Pixel
serial number HT7BV1A03980.

A TRUE BILL:

FOREPERSON

signed by Matthew F. Madden on behalf of JOHN R. LAUSCH, JR. United States Attorney