

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA

v.

GARY WILSON

No.

Violations: Title 18, United States
Code, Sections 2251(a) and 2260A

COUNT ONE

The SEPTEMBER 2019 GRAND JURY charges:

On or about June 9, 2018, in the Northern District of Illinois, Western
Division, and elsewhere,

GARY WILSON,

defendant herein, did knowingly use, persuade, induce, and entice a minor,
namely, Minor A, to engage in sexually explicit conduct for the purpose of
producing a visual depiction of such conduct, which visual depiction defendant
knew and had reason to know would be transported and transmitted using any
means and facility of interstate and foreign commerce, and that visual
depiction was produced and transmitted using materials that had been mailed,
shipped, and transported in and affecting interstate and foreign commerce by

any means, and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce;

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

COUNT TWO

The SEPTEMBER 2019 GRAND JURY further charges:

On or about June 23, 2018, in the Northern District of Illinois, Western Division, and elsewhere,

GARY WILSON,

defendant herein, did knowingly use, persuade, induce, and entice a minor, namely, Minor B, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using any means and facility of interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce;

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

COUNT THREE

The SEPTEMBER 2019 GRAND JURY further charges:

Beginning on or about June 23, 2018, and continuing to on or about May 12, 2019, in the Northern District of Illinois, Western Division, and elsewhere,

GARY WILSON,

defendant herein, did knowingly use, persuade, induce, and entice a minor, namely, Minor C, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using any means and facility of interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce;

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

COUNT FOUR

The SEPTEMBER 2019 GRAND JURY further charges:

On or about April 17, 2019, in the Northern District of Illinois, Western Division, and elsewhere,

GARY WILSON,

defendant herein, did knowingly use, persuade, induce, and entice a minor, namely, Minor D, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using any means and facility of interstate and foreign commerce, and that visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and which visual depiction was actually transported and transmitted in and affecting interstate and foreign commerce;

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

COUNT FIVE

The SEPTEMBER 2019 GRAND JURY further charges:

Starting no later than on or about June 9, 2018, in the Northern District of Illinois, Western Division, and elsewhere,

GARY WILSON,

defendant herein, being required by federal and other law to register as sex offender, did commit a felony offense involving a minor under section 2251, namely, the felony offenses alleged in Counts One through Four of this Indictment;

In violation of Title 18, United States Code, Section 2260A.

FORFEITURE ALLEGATION

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 2251 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).

2. The property to be forfeited includes, but is not limited to the following specific property:

- Pink Apple iPhone, IMEI 356706081907257, with black and gold case
- Blue SanDisk thumb drive, Model: SDCZ57-064G, serial number BN170425469B
- SanDisk SD card, 16 GB, serial number BL1315822373D
- Dell laptop, Model: PP29L, Service tag: 822NYG1, with battery cord
- Toshiba hard drive, serial number 38FJT02MTC21EC.A (from Dell laptop)

- Xbox One S, Model: 1681, serial number 139685383416, with power cord and controller
- Seagate 1 TB hard drive, serial number WL1B6L3S (from Xbox One)

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

A TRUE BILL:

FOREPERSON

signed by Margaret Schneider on behalf of the
UNITED STATES ATTORNEY