

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)
)
 v.) No.
)
) Violations: Title 18, United States
) Code, Section 2252A(a)(1)
PIERRE D. HAYES)

COUNT ONE

The NOVEMBER 2015 GRAND JURY charges:

On or about January 4, 2015, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

PIERRE D. HAYES,

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), namely, a computer file titled 007_002.JPG, using a means and facility of interstate and foreign commerce;

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

COUNT TWO

The NOVEMBER 2015 GRAND JURY further charges:

On or about May 4, 2015, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

PIERRE D. HAYES,

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), namely, a computer file titled Babyhead.wmv, using a means and facility of interstate and foreign commerce;

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

COUNT THREE

The NOVEMBER 2015 GRAND JURY further charges:

On or about October 23, 2015, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

PIERRE D. HAYES,

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), namely, a computer file titled Recode_lez.mp4, using a means and facility of interstate and foreign commerce;

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

FORFEITURE ALLEGATION

The NOVEMBER 2015 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 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:

a. the following specific property:

i. One Cellular Telephone, Alcatel One Touch, White in color, IMEI # 014247003652451.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; the United States of America shall be entitled to forfeiture

of substitute property, as provided by Title 21, United States Code Section 853(p).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY