

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

|                          |   |  |
|--------------------------|---|--|
| UNITED STATES OF AMERICA | : | Hon.                                   |
|                          | : |  |
| v.                       | : | Crim. No. 25-                          |
|                          | : |  |
| DOMINIQUE SACZAWA        | : | 18 U.S.C. §§ 2251(a) and (e)           |
|                          | : | 18 U.S.C. §§ 2252A(a)(2)(A) and (b)(1) |
|                          | : | 18 U.S.C. §§ 2251(d)(1)(A) and (e)     |
|                          | : | 18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2) |
|                          | : | 18 U.S.C. § 2                          |

**INFORMATION**

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

**COUNT ONE**  
**(Production of Child Pornography)**

From on or about June 7, 2021, through on or about August 29, 2021, in Sussex County, in the District of New Jersey and elsewhere, the defendant,

**DOMINIQUE SACZAWA,**

did knowingly employ, use, persuade, induce, entice, and coerce Victim 1, a prepubescent minor, to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, which visual depictions were produced and transmitted using materials that had been mailed, 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 2251(a) and (e) and Title 18, United States Code, Section 2.

**COUNT TWO**  
**(Distribution of Child Pornography)**

From on or about June 7, 2021, through on or about August 29, 2021, in Sussex County, in the District of New Jersey and elsewhere, the defendant,

**DOMINIQUE SACZAWA,**

did knowingly and intentionally distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce, and which had been mailed, 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)(2)(A) and (b)(1) and Title 18, United States Code, Section 2.

**COUNT THREE**  
**(Advertisement of Child Pornography)**

On or about August 27, 2021, in Sussex County, in the District of New Jersey and elsewhere, the defendant,

**DOMINIQUE SACZAWA,**

did knowingly make, print, and publish, and cause to be made, printed, and published, a notice and advertisement seeking and offering to receive, exchange, buy, produce, display, distribute, and reproduce a visual depiction, the production of which involved the use of a minor engaging in sexually explicit conduct and which depiction was of such conduct, and such notice and advertisement was transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, and the defendant knew and had reason to know that such notice and advertisement would be so transported.

In violation of Title 18, United States Code, Sections 2251(d)(1)(A) and (e) and Title 18, United States Code, Section 2.

**COUNT FOUR**  
**(Possession of Prepubescent Child Pornography)**

From at least in or around June 2021 through on or about August 31, 2021, in Sussex County, in the District of New Jersey and elsewhere, the defendant,

**DOMINIQUE SACZAWA,**

did knowingly possess and attempt to possess material that contained images and videos of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), including images of a prepubescent minor, which images had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which images were produced using materials that had been mailed, 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 (b)(2) and Title 18, United States Code, Section 2.

## **FORFEITURE ALLEGATION**

Upon conviction of any of the offenses in violation of Title 18, United States Code, Sections 2251(a), 2252A(a)(2)(A), 2251(d)(1)(A), and 2252A(a)(5)(B) as charged in this Information, the defendant,

**DOMINIQUE SACZAWA,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2253, all right, title, and interest of the defendant in the following:

- (a) any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Part I, Chapter 110;
- (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in this Information, and all property traceable to such property; and
- (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, and all property traceable to such property.

The property subject to forfeiture includes, but is not limited to, all right, title, and interest of the defendant in the following items seized from the defendant's residence on or about August 31, 2021:

- a. LG LM-K500MM Cellular Device, IMEI 355041-61-214761-6;
- b. Coolpad Cellular Device;
- c. Two Motorola Cellular Devices;

d. HP Laptop, Model 172-CA 300, bearing serial number 5CG05029PS;

and

e. HP Laptop, Model 15-BS 020 WM, bearing serial number CND 7280J00.

**Substitute Assets Provision**

If by any act or omission of the defendant any of the property subject to forfeiture described above:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.



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ALINA HABBA  
United States Attorney