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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GERARDO AURELIO ITURBIDE,

Defendant.

INDICTMENTCOUNT 1: 18 U.S.C. §§ 2251(a) and (e), and 2,
Production of Child Pornography;COUNT 2: 18 U.S.C. § 2252A(a)(2)(A), (B) and
(b)(1), Distribution of Child Pornography.

Case: 4:26-cr-00020
Assigned To : Allen, Ann Marie McIlff
Assign. Date : 3/9/2026
Description: USA v.

The Grand Jury charges:

COUNT 1

18 U.S.C. § 2251(a) and (e)
(Production of Child Pornography)

On or about November 23, 2025, in the District of Utah,

GERARDO AURELIO ITURBIDE,

defendant herein, did employ, use, persuade, induce, entice and coerce a minor, Victim, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; and the visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and attempted to do so, and did aid and abet therein; all in violation of 18 U.S.C. § 2251(a) and (e) and 18 U.S.C. § 2.

COUNT 2

18 U.S.C. § 2252A(a)(2)(A), (B) and (b)(1)
(Distribution of Child Pornography)

On or about November 23, 2025, in the District of Utah,

GERARDO AURELIO ITURBIDE,

defendant herein, did knowingly distribute any child pornography, and material that contained child pornography, as defined in 18 U.S.C. § 2256(8), using any means or facility of interstate and foreign commerce, including by computer, and attempted to do so; all in violation of 18 U.S.C. § 2252A(a)(2)(A), (B), and punishable under § 2252A(b)(1).

NOTICE OF INTENT TO SEEK FORFEITURE

Pursuant to 18 U.S.C. § 2253, upon conviction of any offense violating 18 U.S.C. § 2251 or § 2252A, the defendant(s) shall forfeit to the United States of America: (i) any visual depiction described in 2251, 2251A, or 2252, 2252A, 2252B, or 2260 of this chapter, 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 this chapter; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property. The property to be forfeited includes, but is not limited to:

- An Apple iPhone 16 Pro Max;
- Substitute property as allowed by 21 U.S.C. § 853(p) and 18 U.S.C. § 2253(b).

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY

MELISSA HOLYOAK
United States Attorney



BRADY WILSON
Assistant United States Attorney

for