

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

August 7 2024
Ravi Subramanian, Clerk
By Deputy

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NO. CR24-132 JHC

UNITED STATES OF AMERICA,
Plaintiff,
v.
ALAN LEWIS MEIRHOFER,
Defendant.

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Receipt of Child Pornography)

On or about February 1, 2021, in Skagit County, within the Western District of Washington, ALAN LEWIS MEIRHOFER knowingly received, and attempted to receive any visual depiction—the production of which involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct—using any means and facility of interstate and foreign commerce, such visual depiction had been mailed and shipped and transported in and affecting interstate and foreign commerce, and such visual depiction contained materials that have been mailed and so shipped and transported, by any means, including by computer.

All in violation of Title 18, United State Code, Section 2252(a)(2) and 2252(b)(1).

1 All in violation of Title 18, United State Code, Section 2252(a)(2) and 2252(b)(1).

2 **COUNT 2**

3 **(Possession of Child Pornography)**

4 Beginning on a date unknown and continuing until on or about May 22, 2022, in
5 Skagit County, within the Western District of Washington, and elsewhere, ALAN
6 LEWIS MEIRHOFER knowingly possessed, and attempted to do so, matter that
7 contained any visual depiction—the production of which involved the use of a minor
8 engaging in sexually explicit conduct and such visual depiction was of such conduct—
9 that was mailed and shipped and transported using any means and facility of interstate
10 and foreign commerce and in and affecting interstate and foreign commerce and that was
11 produced using materials that had been so mailed and shipped and transported by any
12 means, including by computer, and any visual depiction involved in the offense involved
13 a prepubescent minor and a minor who had not attained 12 years of age.

14 All in violation of Title 18, United State Code, Sections 2252(a)(4)(B) and
15 2252(b)(2).

16 **FORFEITURE ALLEGATION**

17 The allegations contained in Counts 1 and 2 of this Indictment are hereby
18 realleged and incorporated by reference for the purpose of alleging forfeiture.

19 Upon conviction of either of the offenses alleged in Counts 1 and 2, the defendant,
20 ALAN LEWIS MEIRHOFER, shall forfeit to the United States, pursuant to Title 18,
21 United States Code, Section 2253(a), all property used to commit or to facilitate
22 commission of the offense, any proceeds of the offense, and any data files consisting of
23 or containing visual depictions within the meaning of Title 18, United States Code,
24 Section 2253(a)(1).

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1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
2 any act or omission of the defendant,

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

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

12
13 A TRUE BILL:

14 DATED: 8-7-2024

15 *Signature of Foreperson redacted pursuant*
16 *to the policy of the Judicial Conference of*
17 *the United States.*

18 _____
19 FOREPERSON

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20 
21 TESSA M. GORMAN
22 United States Attorney

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23 
24 MARCI L. ELLSWORTH
25 Assistant United States Attorney

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26 
27 CECELIA GREGSON
Assistant United States Attorney