

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 6, 2020

WILLIAM M. McCOOL, Clerk

By  Deputy

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

UNITED STATES OF AMERICA,
Plaintiff,

v.

McKENNA DANILO BERNARDO,
Defendant.

NO. CR20-114 JCC

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Possession of Child Pornography)

Beginning on a date unknown, and continuing until February 11, 2020, in Burien, in King County, within the Western District of Washington, and elsewhere, McKENNA DANILO BERNARDO did knowingly possess matter that contained visual depictions the production of which involved the use of minors engaging in sexually explicit conduct and the visual depictions were of such conduct, that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which had been produced using materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and

1 the images of child pornography involved include images of a prepubescent minor and a
2 minor who had not attained 12 years of age.

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

4 **ALLEGATIONS OF FORFEITURE**

5 The allegation contained in Count 1 of this Indictment is hereby re-alleged and
6 incorporated by reference for the purpose of alleging forfeitures to the United States
7 pursuant to Title 18, United States Code, Section 2253(a).

8 Upon conviction of the offense alleged in Count 1 of this Indictment, the
9 defendant, McKENNA DANILO BERNARDO, shall forfeit to the United States any
10 property, real or personal, used or intended to be used to commit or to promote the
11 commission of such offense, or any property traceable to such property; any property,
12 real or personal, constituting or traceable to gross profits or other proceeds obtained from
13 such offense; and any visual depiction described in Title 18, United States Code, Sections
14 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film,
15 videotape, or other matter which contains any such visual depiction, which was produced,
16 transported, mailed, shipped, or received, in violation of Chapter 110, Title 18, United
17 States Code, including but not limited to the following:

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- 1 a. Any and all images of child pornography, in whatever format and however
2 stored; and
3 b. one Apple iPad, serial number F9FZD2LQMDG1;
4 c. one Apple iPhone; and
5 d. one SanDisk 16GB Memory Card.
6

7 A TRUE BILL:

8 DATED:

8/6/2020

9
10 *Signature of the foreperson is redacted*
11 *pursuant to the policy of the Judicial*
12 *Conference of the United States*

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16 FOREPERSON

15 BRIAN T. MORAN
16 United States Attorney

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18 KATE VAUGHAN
19 Assistant United States Attorney

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21 CECELIA Y. GREGSON
22 Assistant United States Attorney
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