

FILED

JAN 9 2019

CLERK OF THE COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOISIN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
URBANA DIVISION

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

HUNTER D. ROUSH,)

Defendant.)

Criminal No. 19-CR-200⁰³Title 18, United States Code, Sections
2252A(a)(1) and (b)(1);
2252A(a)(5)(B) and (b)(2); and
2253.**INDICTMENT****COUNT ONE**

(Transportation of Child Pornography)

THE GRAND JURY CHARGES THAT:

On or about September 2, 2016, in Macon County, in the Central District of Illinois,
and elsewhere,

HUNTER D. ROUSH,

defendant herein, knowingly transported and shipped child pornography, as defined in Title 18, United States Code, Sections 2256(8)(A) and (B), including visual depictions of minors engaging in sexually explicit conduct, such child pornography was shipped and 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.

All in violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

COUNT TWO

(Possession of Child Pornography)

On or about February 9, 2017, in Macon County, in the Central District of Illinois,

HUNTER D. ROUSH,

defendant herein, knowingly possessed cellular telephones, computer processing units, and other digital storage materials, containing images and videos of child pornography, in addition to those charged in Count One, as defined in Title 18, United States Code, Sections 2256(8)(A) and (B), in that the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct, and said images had been shipped and transported in interstate and foreign commerce, including by computer, and had been produced using materials which had been shipped and transported in interstate and foreign commerce, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

FORFEITURE NOTICE

1. The charge contained in Count One and Two are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to the provisions of Title 18, United States Code, Section 2253.

2. For his engagement in the violations alleged in Count One and Two,

HUNTER D. ROUSH,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all interest in:

a. Any visual depictions or other matter containing such visual depictions which were produced, transported, mailed, shipped, received, or possessed as alleged in Count One and Two of this Indictment;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses alleged in Count One and Two of this Indictment; and

c. Any property, real or personal, used or intended to be used to commit or promote the commission of the offenses alleged in Count One and Two of this Indictment.

3. The property referenced in paragraph 2, subparagraphs a, b, and c above includes, but is not limited to, video recorders and accessories, cameras, computer hardware, such as monitors, central processing units, keyboards, computer programs, software, computer storage devices, such as disk drive units, disks, tapes, hard disk drives/units, peripherals, modems and other telephonic and acoustical equipment,

printers, contents of memory data contained in and through the aforementioned hardware and software, tools, equipment, manuals and documentation for the assembly and use of the aforementioned hardware and software, including the specific equipment listed:

- Nextbook tablet, Serial No. YFAV1115007529
- Lenovo Laptop
- Three Cricket ZTE Cellular Phones
- SanDisk 8GB Thumb Drive
- P NY 64GB Thumb Drive
- Blackberry Cellular Phone
- Blu Cellular Phone
- 64GB Micro SD Card
- 8GB Cruiser Thumb Drive
- NextBook tablet, Serial No. YFG071323S057
- Orico External Hard Disk Drive
- Nextbook tablet, Serial No. YFAV1015082225
- 16GB Toshiba Micro SD Card
- Seagate 80GB Hard disk drive, Serial No. 3JV4K541
- Disc Media (12 Discs)

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL,

s/Foreperson

FOREPERSON

s/John Milhiser

JOHN C. MILHISER
UNITED STATES ATTORNEY
EMP