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**APR 19 2016**

**CLERK U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF IOWA**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,

v.

JASON MICHAEL MOWER,

Defendant.

Criminal No. 3:16-cr-19

**INDICTMENT**

T. 18 U.S.C. § 2252(a)(2)

T. 18 U.S.C. § 2252(b)(1)

T. 18 U.S.C. § 2252(a)(4)(B)

T. 18 U.S.C. § 2252(b)(2)

T. 18 U.S.C. § 2253

**THE GRAND JURY CHARGES:**

**COUNT 1**

**(Receiving Child Pornography)**

On or about January 2013 to July 13, 2015, in the Southern District of Iowa, the defendant, JASON MICHAEL MOWER, did knowingly receive, and attempt to receive, visual depictions that had been shipped and transported in interstate and foreign commerce by any means, including by computer, said visual depictions consisting of computer-generated image and video files, the producing of which involved the use of minors engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256, said visual depictions being of such conduct.

This is a violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 2  
(Possession of Child Pornography)**

On or about July 14, 2015, in the Southern District of Iowa, the defendant, JASON MICHAEL MOWER, did knowingly possess one (1) and more items containing visual depictions that had been shipped and transported in interstate and foreign commerce, and which were produced using materials which had been so shipped and transported, by any means including by a computer, the producing of said visual depictions involving the use of minors, that is, persons under the age of eighteen (18) years, and depictions of a prepubescent minor or a minor who had not attained 12 years of age, engaged in sexually explicit conduct as defined in Title 18, United States Code, § 2256(2), said visual depictions being of such conduct.

This is a violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

**THE GRAND JURY FURTHER FINDS:**

**NOTICE OF FORFEITURE**

1. The allegations contained in Counts 1 and 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to the provisions of Title 18, United States Code, Section 2253.

2. From his engagement in any or all of the violations alleged in Counts 1 and 2 of this Indictment, the defendant, JASON MICHAEL MOWER, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all interest in:

- a. Any visual depiction or other matter containing such visual depiction which was produced, transported, mailed, shipped, received, or possessed as alleged in Count 1 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 1 of this Indictment; and,
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses alleged in Count 1 of this Indictment.

3. The property referenced in paragraph 2, subparagraphs a, b, and c above includes, but is not limited to, computer hardware such as monitors, central processing units, and keyboards, computer programs, software, computer storage devices such as disk drive units, disks, tapes, and 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.

4. If, as a result of any act or omission of the defendant, JASON MICHAEL MOWER, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(a) and (B), to seek forfeiture of any other property of the defendant, JASON MICHAEL MOWER, up to the value of any forfeitable property described above.

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

**A TRUE BILL**

/s/  
FOREPERSON

Kevin E. VanderSchel  
Acting United States Attorney

By: /s/  
Melisa K. Zaehring  
Assistant United States Attorney