

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

BRANDON J. BERGTHOLD

Violations: Title 18, United States  
Code, Sections 2252A(a)(1),  
2252A(a)(5)(B), 2252A(b)(1), and  
2252A(b)(2)

**COUNT ONE**

The SPECIAL JULY 2021 GRAND JURY charges:

On or about August 7, 2021, at Frankfort, in the Northern District of Illinois,  
Eastern Division, and elsewhere,

BRANDON J. BERGTHOLD,

defendant herein, knowingly possessed material, namely, a black Samsung model  
S20 FE 5G cellular phone with IMEI 359823613628991, that contained an image of  
child pornography, as defined in Title 18, United States Code, Section 2256(8)(A),  
involving a prepubescent minor and a minor who had not attained 12 years of age,  
such image having been shipped and transported in interstate and foreign commerce  
by any means, and such image having been produced using materials that had been  
shipped and transported in interstate and foreign commerce by any means, including  
by computer;

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

**COUNT TWO**

The SPECIAL JULY 2021 GRAND JURY further charges:

On or about October 17, 2021, at Frankfort, in the Northern District of Illinois, Eastern Division, and elsewhere,

BRANDON J. BERGTHOLD,

defendant herein, did knowingly transport and cause to be transported, child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), including, file name 34b1b78c-1242-4b98-84eb-c698b84c3555.mp4, using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer;

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

**FORFEITURE ALLEGATION**

The SPECIAL JULY 2021 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 2252A as set forth in this Indictment, defendant shall forfeit to the United States of America any matter which contains visual depictions described in Title 18, United States Code, Section 2252A, and any property used and intended to be used to commit and to promote the commission of such offense, as provided by Title 18, United States Code, Section 2253(a).

2. The property to be forfeited includes, but is not limited to, the following specific property: a black Samsung model S20 FE 5G cellular phone with IMEI 359823613628991.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
Signed by Erika Csicsila on behalf of the  
UNITED STATES ATTORNEY