

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Brian R. Martinotti
 :
 v. : Crim. No. 24-
 :
 DENNIS NEROLICH : 18 U.S.C. §§ 2252A(a)(5)(B) and
 : (b)(2)

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

From in or around March 2016 through on or about May 1, 2018, in Ocean County, in the District of New Jersey, and elsewhere, the defendant, DENNIS NEROLICH, did knowingly possess and attempt to possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which images had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which images were produced using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, including by computer.

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

FORFEITURE ALLEGATION

1. The United States hereby gives notice that upon the conviction of the defendant Dennis Nerolich of the offense in violation of 18 U.S.C.

§ 2252A(a)(5)(B) and (b)(2) charged in this Information, the United States will seek forfeiture, in accordance with 18 U.S.C. § 2253, of all right, title and interest of the defendant in the following:

- (a) any visual depiction described in 18 U.S.C. §§ 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense charged in this Information, and all property traceable to such property; and
- (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, and all property traceable to such property.

2. The property to be forfeited includes, but is not limited to, all right, title, and interest of the defendant in the following items seized from the defendant's residence on or about May 1, 2018:

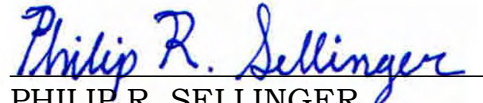
- (a) Apple iPad Air tablet, Model ME898LL/A, serial number DMPLL5QCFK13; and
- (b) Apple iPad Mini 3 tablet, Model MGP32LL/A, serial number DLXNM0XAG5V7.

Substitute Assets Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (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 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253, to seek forfeiture of any other property of the defendant up to the value of the forfeitable property listed above.


PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: 24-_____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

DENNIS NEROLICH

INFORMATION FOR

18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)

PHILIP R. SELLINGER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY

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