



IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

SEALED INDICTMENT

v.

Case No. 24-cr-50-jdp
18 U.S.C. § 1466A(a)(1), (b)(1)
18 U.S.C. § 1470

STEVEN ANDEREGG,

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

Between on or about October 20, 2023, and on or about December 28, 2023, in the Western District of Wisconsin, the defendant,

STEVEN ANDEREGG,

knowingly produced at least one visual depiction that depicted a minor engaging in sexually explicit conduct and was obscene, and attempted to do so, and any visual depiction involved in the offense had been shipped and transported in interstate and foreign commerce by any means, including by computer, and was produced using materials that had been mailed, and 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, Section 1466A(a)(1) and (d)(4)).

COUNT 2

On or about October 7, 2023, in the Western District of Wisconsin, the defendant,

STEVEN ANDEREGG,

knowingly distributed at least one visual depiction that depicted a minor engaging in sexually explicit conduct and was obscene, and any communication involved in and made in furtherance of the offense was communicated and transported in interstate and foreign commerce by any means, including by computer, and any means and instrumentality of interstate and foreign commerce was otherwise used in committing and in furtherance of the commission of the offense.

(In violation of Title 18, United States Code, Section 1466A(a)(1) and (d)(1)).

COUNT 3

On or about October 7, 2023, in the Western District of Wisconsin, the defendant,

STEVEN ANDEREGG,

using a facility and means of interstate commerce, knowingly transferred obscene matter to another individual who had not attained the age of 16 years, knowing that such other individual had not attained the age of 16 years, and attempted to do so.

(In violation of Title 18, United States Code, Section 1470).

COUNT 4

From on or about October 20, 2023, to on or about February 22, 2024, in the Western District of Wisconsin, the defendant,

STEVEN ANDEREGG,

knowingly possessed at least one visual depiction that depicted a minor engaging in sexually explicit conduct and was obscene, and any visual depiction involved in the offense had been shipped and transported in interstate and foreign commerce by any means, including by computer, and was produced using materials that had been

mailed, and 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, Section 1466A(b)(1) and (d)(4)).

FORFEITURE ALLEGATION

Upon conviction of any offense alleged in Counts 1, 2, 3, or 4 this indictment, pursuant to Title 18, United States Code, Section 1467, the defendant,

STEVEN ANDEREGG,

shall forfeit to the United States all of his right, title, and interest in:

(1) any obscene material produced, transported, mailed, shipped, or received in the respective offense;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the respective offense; and

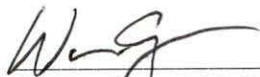
(3) any property, real or personal, used or intended to be used to commit or to promote the commission of the respective offense.

A TRUE BILL



PRESIDING JUROR

Indictment returned: 2024-05-15

 FOR

STEVEN J. GROCKI
Chief, Child Exploitation and Obscenity Section