

PAR/JK: 2021R00172
JM 05.03.21

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

DANIEL MOROZEWICZ,

Defendant.

CRIMINAL NO.

SAG 21cr152

(Possession of Child Pornography, 18
U.S.C. § 2252A(a)(5)(B) & (b)(2)
Forfeiture, 18 U.S.C. § 2253, 21 U.S.C.
§ 853(p), 28 U.S.C. § 2461(e))

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2021 MAY -6 PM 2:44
CLERK'S OFFICE
AT BALTIMORE
MARYLAND

INDICTMENT

COUNT ONE

(Possession of Child Pornography)

The Grand Jury for the District of Maryland charges that:

On or about March 5, 2021, in the District of Maryland, the defendant,

DANIEL MOROZEWICZ,

did knowingly possess and knowingly access with intent to view any book, magazine, periodical, film, videotape, computer disk, and any other material that contained an image of child pornography, as defined in Title 18 United States Code, Section 2256(8)(A), that had been mailed, 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, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant possessed a Seagate Hard Drive, SN: 5LZ45THB, which contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B), 2252A(b)(2) & 2256

COUNT TWO
(Possession of Child Pornography)

The Grand Jury for the District of Maryland charges that:

On or about March 5, 2021, in the District of Maryland, the defendant,

DANIEL MOROZEWICZ,

did knowingly possess and knowingly access with intent to view any book, magazine, periodical, film, videotape, computer disk, and any other material that contained an image of child pornography, as defined in Title 18 United States Code, Section 2256(8)(A), that had been mailed, 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, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant possessed a Verbatim Store & Go USB drive, which contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B), 2252A(b)(2) & 2256

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 2253, 18 U.S.C. § 853(p), and 28 U.S.C. § 2461(c) as a result of the defendant's conviction under any of the offenses alleged in Counts One and Two of this Indictment.

2. Upon conviction of any of the offenses set forth in Counts One and Two of the Indictment, the defendant,

DANIEL MOROZEWICZ,

shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a):

a. any visual depiction described in Title 18, United States Code, Sections 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, received or possessed 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 such offense; and

c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

3. The property to be forfeited includes, but is not limited to, the following:

a. a Seagate Hard Drive, SN: 5L045THB; and

b. a Verbatim Store & Go USB drive.

Substitute Assets

4. If any of the property described above, 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 party;
- 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 that cannot be subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c).

18 U.S.C. § 2253
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)

Jonathan F. Lenzner/par
Jonathan F. Lenzner
Acting United States Attorney

A TRUE BILL

SIGNATURE REDACTED

Foreperson

Date: May 6, 2021