

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

UNITED STATES OF AMERICA)
) Cause No.
)
) 18 U.S.C. 2251(a)
) 18 U.S.C. 2252A(a)(2)(A)
) 18 U.S.C. 2252A(a)(5)(B)
JAMES W. BOND)

COUNT ONE
Sexual Exploitation of a Minor

The GRAND JURY charges:

1. At times material to this Indictment:
 - a. The City of Gary operated the Summer Youth Employment Program for Gary residents between the ages of 14 and 22.
 - b. Defendant **JAMES W. BOND** was a police officer and Commander with the Gary Police Department.
2. In the summer of 2024, Minor A was a minor employed by the City of Gary as part of the Summer Youth Employment Program. Minor A was assigned to the Gary Police Department.

3. From on or about July 2, 2024, and continuing through on or about July 9, 2024, in the Northern District of Indiana,

JAMES W. BOND,

defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor, namely, Minor A, to engage in sexually explicit conduct, for the purpose of producing a visual depiction of such conduct, which visual depiction defendant knew and had reason to know would be transported and transmitted using a means and facility of interstate commerce and in and affecting interstate commerce, and which visual depiction was actually transported and transmitted using a means and facility of interstate commerce and in and affecting interstate commerce;

In violation of Title 18, United States Code, Section 2251(a).

COUNT TWO
Receipt of Child Pornography

On or about July 8, 2024, in the Northern District of Indiana,

JAMES W. BOND,

defendant herein, knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely, an image titled C9F7E799-AB9C-EC0F-52C4-D4A64BF5DED5.png, using a means and facility of interstate commerce, and which image had been transported in or affecting interstate and foreign commerce;

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT THREE
Possession of Child Pornography

On or about July 12, 2024, in the Northern District of Indiana,

JAMES W. BOND,

defendant herein, knowingly possessed material, namely an Apple iPhone 15 bearing IMEI number 355364286167540, that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), namely, an image titled C9F7E799-AB9C-EC0F-52C4-D4A64BF5DED5.png, such image having been shipped or transported using any means or facility of interstate commerce and in or affecting interstate commerce by any means, including by computer, and such image having been produced using materials that had been shipped and transported in and affecting interstate commerce by any means;

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FORFEITURE ALLEGATION

The GRAND JURY further alleges:

1. The allegations in Counts One, Two, and Three of this Indictment are hereby realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to Title 18, United States Code, Section 2253.

2. Upon conviction of an offense in violation of Title 18, United States Code, Sections 2251(a) and 2252A as set forth in this Indictment, **JAMES W. BOND**, defendant shall forfeit to the United States of America, pursuant to Title 18, United State Code, Section 2253, any and all right, title, and interest he has in any matter which contains visual depictions described in Title 18, United States Code, Sections 2251 and, 2252A, as well as any property used and intended to be used to commit and promote the commission of such offense, and any property traceable to such property, to the charged offenses.

3. The property to be forfeited includes, but is not limited to the following specific property: an Apple iPhone 15 bearing IMEI 355364286167540.

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY