

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

UNITED STATES OF AMERICA)	
)	Criminal No. 1:24-CR-04
v.)	Erie
)	(18 U.S.C. §§ 2251(a), 2251(e), 2252(a)(1),
MATTHEW JAMES CHANTELOIS)	2252(b)(1), 2252(a)(4)(B) and 2252(b)(2))

INDICTMENT

COUNT ONE

The grand jury charges:

From in and around October 2023, to in and around January 2024, in the Western District of Pennsylvania and elsewhere, the defendant, MATTHEW JAMES CHANTELOIS, did employ, use, persuade, induce, entice and coerce Minor A, an individual who had not attained the age of 18 years and whose identity is known to the grand jury, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct: to wit, video files depicting Minor A engaged in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, which visual depictions were produced using materials that had been mailed, shipped and transported in or affecting interstate and foreign commerce by any means, including by computer and the visual depictions were actually transported in interstate commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

The grand jury further charges:

In and around January 2024, in the Western District of Pennsylvania and elsewhere, the defendant, MATTHEW JAMES CHANTELOIS, did knowingly transport or ship, using any means and facility of interstate and foreign commerce or in and affecting interstate and foreign commerce by any means including by computer, one or more visual depictions, to wit: images of Minor A, an individual who had not attained the age of 18 years and whose identity is known to the grand jury, the production of such visual depictions having involved the use of a minor engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and such visual depictions were of such conduct.

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

COUNT THREE

The grand jury further charges:

In and around January 2024, in the Western District of Pennsylvania and elsewhere, the defendant, MATTHEW JAMES CHANTELOIS, did knowingly possess visual depictions, namely, images in computer graphic and digital files, the production of which involved the use of Minor A, an individual who had not attained the age of 18 years and whose identity is known to the grand jury, engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, all of which had been shipped and transported using any means or facility of interstate and foreign commerce, or were produced using materials which had been shipped and transported in interstate and foreign commerce, by any means, including by phone, vehicle and the Internet.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATIONS

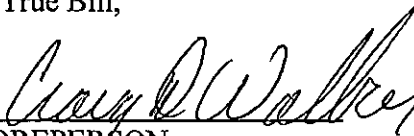
1. The grand jury re-alleges and incorporates by reference the allegations contained in Counts One through Three of this Indictment for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 2253(a)(3).

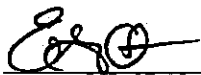
2. As a result of the commission of the violations charged in Counts One through Three of this Indictment, the defendant, MATTHEW JAMES CHANTELOIS, did use the following to commit or to promote the commission of said violations (hereinafter referred to as the "Subject Property"):

- a) a black Samsung Trac Phone bearing IMEI 351347072934839, Model# SM-S134DL;
- b) a gray Samsung phone bearing IMEI 352766392207841.

WHEREFORE, the government seeks forfeiture of the Subject Property pursuant to Title 18, United States Code, Section 2253(a)(3).

A True Bill,


FOREPERSON



ERIC G. OLSHAN
United States Attorney
IL ID No. 6290382



CHRISTIAN A. TRABOLD
Assistant United States Attorney
PA ID No. 75013

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

UNITED STATES OF AMERICA

v.

MATTHEW JAMES CHANTELOIS

Criminal No. 24-04 Erie

CERTIFICATION AND NOTICE FOR FILING PRETRIAL MOTIONS

I hereby certify that I have been notified by the United States Magistrate Judge that all pretrial motions must be filed within fourteen (14) days of Arraignment unless the Court extends the time upon written application made within said fourteen (14) day period.

Date

Attorney for Defendant
MATTHEW JAMES CHANTELOIS

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

UNITED STATES OF AMERICA

v.

MATTHEW JAMES CHANTELOIS

Criminal No. 24-04 Erie

ARRAIGNMENT PLEA

Defendant MATTHEW JAMES CHANTELOIS

being arraigned, pleads _____

in open Court this _____ day of

_____, 20 _____

(Defendant's Signature)

(Attorney for Defendant)

CRIMINAL CASE INFORMATION SHEET

Pittsburgh _____ Erie X Johnstown _____

Related to No. _____ Judge _____
(All criminal prosecutions arising out of the same criminal transaction or series of transactions are deemed related).

- CATEGORY:
- 1. _____ Narcotics and Other Controlled Substances
 - 1a. _____ Narcotics and Other Controlled Substances
(3 or more Defendants)
 - 2. _____ Fraud and Property Offenses
 - 2a. _____ Fraud and Property Offenses
(3 or more Defendants)
 - 3. _____ Crimes of Violence
 - 4. X Sex Offenses
 - 5. _____ Firearms and Explosives
 - 6. _____ Immigration
 - 7. _____ All Others

Defendant's name: Matthew James Chantelois

Is Indictment waived: _____ Yes X No

Pretrial Diversion: _____ Yes X No

Juvenile proceeding: _____ Yes X No

Defendant is: X Male _____ Female

Superseding Indictment or Information _____ Yes X No

Previous case number: _____

If superseding, previous case was/will be:

- _____ Dismissed on defendant's motion
- _____ Dismissed on government's motion
- _____ After appellate action
- _____ Other (explain)

County in which first offense cited occurred: Erie

Previous proceedings before Magistrate Judge: _____

* Case No.: _____

PLEASE INCORPORATE MAGISTRATE CASE WITH CRIMINAL CASE

Date arrested or date continuous U.S. custody began: _____

Defendant: X is in custody is not in custody

Name of Institution: Erie County Prison

Custody is on: this charge X another charge

another conviction

X State Federal

Detainer filed: Yes X No

Date detainer filed: _____

Total defendants: 1

Total counts: 3

Data below applies to defendant No.: 1

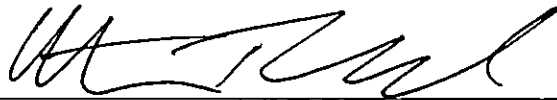
Defendant's name: Matthew James Chantelois

SUMMARY OF COUNTS

<u>COUNT</u>	<u>U.S. CODE</u>	<u>OFFENSE</u>	<u>FELONY</u>	<u>MISDEMEANOR</u>
1	18 U.S.C. §§ 2251(a) and (e)	Sexual exploitation of a minor	XX	
2	18 U.S.C. §§ 2252(a)(1) and 2252(b)(1)	Transportation of material depicting the sexual exploitation a minor	XX	
3	18 U.S.C. §§ 2252(a)(4)(B) and 2252(b)(2)	Possession of material depicting the sexual exploitation of a minor	XX	

FORFETURE ALLEGATIONS

DATE: FEB 13 2024



 CHRISTIAN A. TRABOLD
 Assistant U.S. Attorney
 PA ID No. 75013