

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

TRAVIS CHARLES STIEHL,

Defendant.

INDICTMENT

_____/

The Grand Jury charges:

COUNT ONE

(Sexual Exploitation of a Child and Attempted Sexual Exploitation of a Child)

On or about September 12, 2011, in Kent County, in the Southern Division of the Western District of Michigan,

TRAVIS CHARLES STIEHL

knowingly used, persuaded, induced, enticed, and coerced and attempted to use, persuade, induce, entice, and coerce a child to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

Specifically, the defendant photographed a naked child approximately three years old touching his penis and exposing his nude pubic area to the camera in a lascivious manner. The

defendant produced the image using equipment including, but not limited to, one or both of the following: a Canon Powershot digital camera and a Western Digital SATA 1TB Hard Drive, both manufactured outside the state of Michigan.

18 U.S.C. § 2251(a) and (e)

COUNT TWO

(Sexual Exploitation of a Child and Attempted Sexual Exploitation of a Child)

On or about December 9, 2011, in Kent County, in the Southern Division of the Western District of Michigan,

TRAVIS CHARLES STIEHL

knowingly used, persuaded, induced, enticed, and coerced and attempted to use, persuade, induce, entice, and coerce a child to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

Specifically, the defendant photographed a child approximately three years old, exposing the child's nude pubic area in a lascivious manner by pulling down the child's diaper and focusing the images on the child's penis. The defendant produced the images using equipment including, but not limited to, one or both of the following: a Canon Powershot digital camera and a Western Digital SATA 1TB Hard Drive, both manufactured outside the state of Michigan.

18 U.S.C. § 2251(a) and (e)

COUNT THREE

(Sexual Exploitation of a Child and Attempted Sexual Exploitation of a Child)

On or about May 9, 2012, in Kent County, in the Southern Division of the Western District of Michigan,

TRAVIS CHARLES STIEHL

knowingly used, persuaded, induced, enticed, and coerced and attempted to use, persuade, induce, entice, and coerce a child to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

Specifically, the defendant took a video of a child approximately two years old, exposing the child's nude pubic area in a lascivious manner while changing the child's diaper. The defendant produced the video using equipment including, but not limited to, one or both of the following: a Canon Powershot digital camera and a Western Digital SATA 1TB Hard Drive, both manufactured outside the state of Michigan.

18 U.S.C. § 2251(a) and (e)

COUNT FOUR
(Sexual Exploitation of a Child)

On or about May 17, 2012, in Kent County, in the Southern Division of the Western District of Michigan,

TRAVIS CHARLES STIEHL

knowingly used, persuaded, induced, enticed, and coerced a child to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

Specifically, the defendant took photographs of a child approximately four years old who was wearing only a shirt, exposing the child's pubic area to the camera in a lascivious manner, with an adult hand touching the child's penis in one or more of the photographs. The defendant produced the images using equipment including, but not limited to, one or both of the following: a Canon Powershot digital camera and a Western Digital SATA 1TB Hard Drive, both manufactured outside the state of Michigan.

18 U.S.C. § 2251(a) and (e)

COUNT FIVE

(Sexual Exploitation of a Child and Attempted Sexual Exploitation of a Child)

On or about July 17, 2012, in Kent County, in the Southern Division of the Western District of Michigan,

TRAVIS CHARLES STIEHL

knowingly used, persuaded, induced, enticed, and coerced and attempted to use, persuade, induce, entice, and coerce a child to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

Specifically, the defendant took a video of a child approximately nine years old exposing his pubic area in a lascivious manner. The defendant produced the video using equipment including, but not limited to, one or both of the following: a Canon Powershot digital camera and a Western Digital SATA 1TB Hard Drive, both manufactured outside the state of Michigan.

18 U.S.C. § 2251(a) and (e)

COUNT SIX

(Sexual Exploitation of a Child and Attempted Sexual Exploitation of a Child)

On or about August 8, 2012, in Kent County, in the Southern Division of the Western District of Michigan,

TRAVIS CHARLES STIEHL

knowingly used, persuaded, induced, enticed, and coerced and attempted to use, persuade, induce, entice, and coerce a child to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

Specifically, the defendant took photographs of a child approximately four years old exposing his nude pubic area to the camera in a lascivious manner. The defendant produced the images using equipment including, but not limited to, one or both of the following: a Canon Powershot digital camera and a Western Digital SATA 1TB Hard Drive, both manufactured outside the state of Michigan.

18 U.S.C. § 2251(a) and (e)

COUNT SEVEN

(Sexual Exploitation of a Child and Attempted Sexual Exploitation of a Child)

On or about July 27, 2013 in Muskegon County, in the Southern Division of the Western District of Michigan,

TRAVIS CHARLES STIEHL

knowingly used, persuaded, induced, enticed, and coerced and attempted to use, persuade, induce, entice, and coerce a child to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

Specifically, the defendant took one or more videos of children, including prepubescent boys, changing clothes, exposing their nude pubic areas in a lascivious manner. The defendant produced the video using equipment including, but not limited to, one or both of the following: an Apple iPhone and a Western Digital SATA 1TB Hard Drive, both manufactured outside the state of Michigan.

18 U.S.C. § 2251(a) and (e)

COUNT EIGHT

(Sexual Exploitation of a Child and Attempted Sexual Exploitation of a Child)

On or about August 20, 2013, in Kent County, in the Southern Division of the Western District of Michigan,

TRAVIS CHARLES STIEHL

knowingly used, persuaded, induced, enticed, and coerced and attempted to use, persuade, induce, entice, and coerce a child to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

Specifically, the defendant took photographs of a child approximately two years old lying down and exposing his pubic area in a lascivious manner. The defendant produced the images using equipment including, but not limited to, one or both of the following: an Apple iPhone and a Western Digital SATA 1TB Hard Drive, both manufactured outside the state of Michigan.

18 U.S.C. § 2251(a) and (e)

COUNT NINE
(Possession of Child Pornography)

On or about December 5, 2013, in Kent County, in the Southern Division of the Western District of Michigan,

TRAVIS CHARLES STIEHL

knowingly possessed approximately 2,000 images and videos of child pornography that involved prepubescent minors, including, but not limited to, one or more of the visual depictions listed below by file name:

1. 00001459.jpg;
2. 000017 (2).jpg;
3. -02~.jpg;
4. 0_13469400_1216470934.jpg;
5. 0_10953000_1194530179.jpg; and
6. 0_05449500_1214079461.jpg.

Such depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, including, but not limited to, a Western Digital SATA 1TB Hard Drive made in Thailand.

18 U.S.C. § 2252A(a)(5)(B) and (b)(2)
18 U.S.C. § 2256(8)(A)

FORFEITURE ALLEGATION

(Sexual Exploitation of a Child and Attempted Sexual Exploitation of a Child; Possession of Child Pornography)

The allegations contained in Counts One through Nine of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253.

Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of 18 U.S.C. §§ 2251 or 2252A,

TRAVIS CHARLES STIEHL

shall forfeit to the United States of America any visual depiction described in 18 U.S.C. §§ 2251 or 2252A; any matter which contains any such visual depiction that was produced, transported, mailed, shipped, and received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following as to each respective count:

- a. Western Digital SATA 1TB Hard Drive, Model Number 10EADS, Serial Number WCAU4D017773 (Counts One through Nine);
- b. Canon Powershot SD1200 IS (Counts One through Six);
- c. Canon Powershot SD1300 IS, Serial Number 042062235097 (Counts One through Six); and
- d. Apple iPhone 4S, Model A1387, Serial Number C8PJKMP3DT9Y. (Counts Seven and Eight).

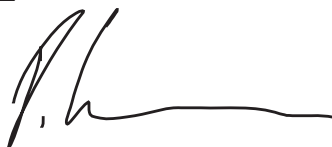
If any of the property described above, as a result of any act or omission of the defendant:

- 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 which cannot be divided without difficulty,

the United States of America 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 by 28 U.S.C. § 2461(c).

18 U.S.C. § 2253
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)
18 U.S.C. § 2251
18 U.S.C. § 2252A
18 U.S.C. § 2256(8)(A)

TRUE BILL



GRAND JURY FOREPERSON

PATRICK A. MILES, JR.
United States Attorney



TESSA K. HESSMILLER
Assistant United States Attorney