

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CR 14-82 MJD/JJK

UNITED STATES OF AMERICA,

) INDICTMENT
)
)

Plaintiff,

) 18 U.S.C. § 2252(a)(2)

v.

) 18 U.S.C. § 2252(a)(4)(B)

MICHAEL THOMAS SCHNAPP,

) 18 U.S.C. § 2252(b)(1)

) 18 U.S.C. § 2252(b)(2)

) 18 U.S.C. § 2253(a)
)
)

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

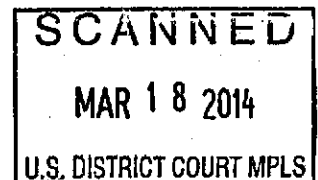
(Receipt of Child Pornography)

On or about April 15, 2013, in the State and District of Minnesota, the defendant,

MICHAEL THOMAS SCHNAPP,

having been previously convicted under the laws of the State of Minnesota relating to the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, namely, a conviction on or about January 8, 2013, in Hennepin County, Minnesota, for Possession of Pornographic Work Involving a Minor, did knowingly receive visual depictions that had been mailed, shipped and transported in interstate commerce, by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such depictions were of such conduct, including, but not limited to, the following computer video files:

- a) p_07.mpg;
- b) p_08.mpg;
- c) p_09.mpg;



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d) p_10.mpg

all in violation of Title 18, United States Code, Section 2252(a)(2) and 2252(b)(1).

COUNT 2

(Distribution of Child Pornography)

On or about July 30, 2013, in the State and District of Minnesota, the defendant,

MICHAEL THOMAS SCHNAPP,

having been previously convicted under the laws of the State of Minnesota relating to the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, namely, a conviction on or about January 8, 2013, in Hennepin County, Minnesota, for Possession of Pornographic Work Involving a Minor, did knowingly distribute visual depictions using a means and facility of interstate commerce and that had been mailed, shipped and transported in interstate commerce, by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such depictions were of such conduct, including, but not limited to, the following computer image files:

a) isl-021-042.jpg;

b) ism-030-034.jpg;

c) ism-030-073.jpg;

d) ism-030-096.jpg;

e) lsp-012b-039.jpg

all in violation of Title 18, United States Code, Section 2252(a)(2) and 2252(b)(1).

COUNT 3
(Attempted Distribution of Child Pornography)

On or about September 4, 2013, in the State and District of Minnesota, the defendant,

MICHAEL THOMAS SCHNAPP,

having been previously convicted under the laws of the State of Minnesota relating to the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, namely, a conviction on or about January 8, 2013, in Hennepin County, Minnesota, for Possession of Pornographic Work Involving a Minor, did knowingly attempt to distribute visual depictions using a means and facility of interstate commerce and that had been mailed, shipped and transported in interstate commerce, by computer, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such depictions were of such conduct, including, but not limited to, the following computer video files:

- a) p_11.mpg
- b) p_12.mpg;
- c) p_13.mpg;
- d) p_14.mpg

all in violation of Title 18, United States Code, Section 2252(a)(2) and 2252(b)(1).

COUNT 4
(Possession of Child Pornography)

On or about September 4, 2013, in the State and District of Minnesota, the defendant,

MICHAEL THOMAS SCHNAPP,

having been previously convicted under the laws of the State of Minnesota relating to the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, namely, a conviction on or about January 8, 2013, in Hennepin County, Minnesota, for Possession of Pornographic Work Involving a Minor, did knowingly possess one or more matters which contained visual depictions that had been shipped and transported using a means and facility of interstate commerce, including by computer, and had been mailed, shipped and transported in and affecting interstate commerce, where the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, including, but not limited to, the following computer video files:

- a) p_15.mpg;
- b) p_16.mpg
- c) p_17.mpg;
- d) p_18.mpg

all in violation of Title 18, United States Code, Section 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATIONS

Counts 1 through 4 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offenses, the defendant,

MICHAEL THOMAS SCHNAPP,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code;

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

(3) 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, including but not limited to: (1) a Hitachi 2TB Hard Drive (serial number MN1240F32WK2AD); (2) a Western Digital 1 TB Hard Drive (serial number WMC1S5616421); (3) a Western Digital 500 GB Hard Drive (serial number WMAYUY797330); (4) a Western Digital 160 GB Hard Drive (serial number WMAP93734406); (5) a Samsung 1 TB Hard Drive (serial number S1VVSJ9BB211351); (6) a LACIE Big Network Attached Backup Device (serial number 1111002140); (7) a LACIE Big Network Attached Storage Device (serial number 1112201871); (8) an HP H9 Computer Tower (serial number MXX21904LM); (9) an Apple iPad 1 (serial number GB045QEPZ3A); (10) a Sony 52" Television (serial number 8015730); and (11) a Sony Vaio Computer Tower (serial number: 3007581).

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2252(a)(2), 2252(a)(4)(B), 2252(b)(1), 2252(b)(2), and 2253(a).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON