

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
ROBERT KNAPPENBERGER : **VIOLATIONS:**
: **18 U.S.C. § 2251(a) (use of a minor to**
: **produce visual depictions of sexually**
: **explicit conduct - 1 count)**
: **18 U.S.C. § 2260A (commission of**
: **sexual exploitation of a minor by a**
: **registered sex offender - 1 count)**
: **18 U.S.C. § 2252(a)(2) (distribution of**
: **child pornography - 3 counts)**
: **18 U.S.C. § 2252(a)(4)(B) (possession of**
: **child pornography - 1 count)**
: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

In or about July 2010, in the Eastern District of Pennsylvania and elsewhere,
defendant

ROBERT KNAPPENBERGER

employed, used, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and did produce a visual depiction of that conduct, entitled 000_00009.jpg, 000_0010.jpg, and 000_0011.jpg, and ROBERT KNAPPENBERGER knew and had reason to know that the visual depiction would be transported using a facility of interstate commerce, that is, the Internet, and the visual depiction was produced using materials that had been shipped and transported in interstate and foreign commerce, and the visual

depiction had actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

In or about July 2010, in the Eastern District of Pennsylvania and elsewhere,
defendant

ROBERT KNAPPENBERGER,

having been convicted in a court of the Commonwealth of Pennsylvania of an offense that required him under state law to register as a sex offender, committed a felony offense involving a minor in violation of Title 18, United States Code, Section 2251(a), as charged in Count One.

In violation of Title 18, United States Code, Section 2260A.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 12, 2010, in the Eastern District of Pennsylvania and elsewhere,

ROBERT KNAPPENBERGER

knowingly distributed visual depictions using a means and facility of interstate and foreign commerce, that is, files entitled 000_00009.jpg, 000_0010.jpg, and 000_0011.jpg, which visual depictions showed a minor engaging in sexually explicit conduct and the producing of those visual depictions involved the use of a minor engaging in sexually explicit conduct.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 31, 2011, in the Eastern District of Pennsylvania and elsewhere,

ROBERT KNAPPENBERGER

knowingly distributed visual depictions, that is, files entitled 280120101100480500, 280120101100480562, and 280120101106270500, using a means and facility of interstate and foreign commerce, which visual depictions showed a minor engaging in sexually explicit conduct and the producing of those visual depictions involved the use of a minor engaging in sexually explicit conduct.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 31, 2011, in the Eastern District of Pennsylvania and elsewhere,

ROBERT KNAPPENBERGER

knowingly distributed a visual depiction, that is, a file entitled 300120101923380927, using a means and facility of interstate and foreign commerce, which visual depiction showed a minor engaging in sexually explicit conduct and the producing of that visual depiction involved the use of a minor engaging in sexually explicit conduct.

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 7, 2011, in the Eastern District of Pennsylvania, defendant

ROBERT KNAPPENBERGER

knowingly possessed matter, namely a computer hard drive, which contained visual depictions that had been produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce. The production of these visual depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of minors engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 2251(a)(1), 2252(a)(2), and 2252(a)(4), set forth in this indictment, defendant

ROBERT KNAPPENBERGER

shall forfeit to the United States of America any visual depictions described in those statutes, and any property used or intended to be used, to commit, or to facilitate or promote the commission of, the violations of Title 18, United States Code, Sections 2251(a)(1), 2252(a)(2), and 2252(a)(4), as charged in this indictment, including, but not limited to:

1. One Kodak EasyShare C613 digital camera, serial number KCGHA81205583;
2. One HP Compaq D220 computer tower, serial number MXD40602TT;
3. One HP Compaq DX5150 computer tower, serial number 2UA641071M; and
4. One eExchange computer with no visible serial number but with Western Digital hard drive, serial number WMALA1205161.

All pursuant to Title 18, United States Code, Section 2253 and Title 21, United States Code, Section 853.

**_____
GRAND JURY FOREPERSON**

**_____
ZANE DAVID MEMEGER
United States Attorney**