

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

UNITED STATES OF AMERICA : CRIMINAL NO. 15-_____
v. : DATE FILED: _____
MARK WILKENS : VIOLATIONS:
: 18 U.S.C. § 2251(a), 2251(e)
: (manufacturing/attempted manufacture
: of child pornography – 5 counts)
: 18 U.S.C. § 2252(a)(4)(B) (possession of
: child pornography – 1 count)
: Notice of forfeiture

INDICTMENT

COUNTS ONE THROUGH FIVE

THE GRAND JURY CHARGES THAT:

On or about the dates listed below, each date constituting a separate count, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere, the defendant,

MARK WILKENS,

employed and used a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and attempted to do so, that is, by photographing the minors to capture and attempt to capture sexually explicit visual depictions, and such depictions were produced using materials that were mailed, shipped, or transported in or affecting interstate or foreign commerce by any means.

Count	Date	Location
1	August 19, 2010	Morris Arboretum, 100 E. Northwestern Avenue, Philadelphia, Pennsylvania

Count	Date	Location
2	July 26, 2014	Camden Children's Garden, 3 Riverside Drive, Camden, New Jersey
3	August 14, 2014	Morris Arboretum, 100 E. Northwestern Avenue, Philadelphia, Pennsylvania
4	May 2, 2015	Franklin Institute, 222 N. 20 th Street, Philadelphia, Pennsylvania
5	July 4, 2015	6500 Rising Sun Avenue, Philadelphia, Pennsylvania

All in violation of Title 18, United States Code, Sections 2251(a), 2251(e).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 27, 2015, in the Eastern District of Pennsylvania, defendant

MARK WILKENS

knowingly possessed books, magazines, periodicals, films, video tapes and other matter, namely a cellular telephone, SD camera cards, and photographs, all of which contained visual depictions that had been produced using materials, which had been shipped and transported in interstate and foreign commerce. The production of these visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of a minor 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 and 2252(a)(4)(B), as set forth in this indictment, defendant

MARK WILKENS

shall forfeit to the United States of America:

(a) any visual depiction described in section 2252, or any film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received as a result of such violation;

(b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violation;

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violation; and

(d) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 18, United States Code, Sections 2422, 2251 and 2252(a)(4)(B), including, but not limited to:

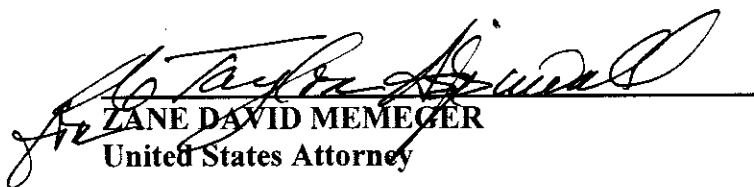
- (1) Alcatel One Touch 5020T smart phone, serial number 013778000050092;
- (2) One Nikon digital camera D90, serial number 3078520;
- (3) One Nikon D70 camera, serial number 3196243;
- (4) One Nikon D3100 camera, serial number 4133230;
- (5) One Nikon Coolpix camera, serial number 32607983;
- (6) One Nikon F4 MB-23 camera, serial number 2531780;
- (7) One FujiFilm Instax 210 camera;

- (8) Various camera attachments, including: one Nikon MH-64 charger; one Targus high speed card reader; one Nikon MH-18a charger; one Nikon speedlight SB-800; one Sigma DG camera lens; one Nikon battery pack; and one Pro Master battery pack;
- (9) A total of 118 SD and compact flash camera cards;
- (10) One Maxtor One Touch 4 Mini 250GB USB hard drive, serial number 2HAS31X2, with cord;
- (11) one PNY 8GB thumb drive, black;
- (12) Various photos/posters/videos depicting minors; and
- (13) Miscellaneous children's clothing.

All pursuant to Title 18, United States Code, Sections 2253 and 2428.

A TRUE BILL:

GRAND JURY FOREPERSON



ZANE DAVID MEMEGER
United States Attorney