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**UNITED STATES DISTRICT COURT  
DISTRICT OF KANSAS**

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**UNITED STATES OF AMERICA,  
PLAINTIFF,**

**vs.**

**CASE No. 20-CR- 40068-HLT**

**JEFFREY D. PIERCE,  
DEFENDANT.**

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**INDICTMENT**

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**THE GRAND JURY CHARGES:**

**COUNT 1  
SEXUAL EXPLOITATION OF A CHILD  
(PRODUCTION OF CHILD PORNOGRAPHY)**

On or about March 10, 2020, in the District of Kansas, the defendant,

**JEFFREY D. PIERCE**

did knowingly employ, use, persuade, induce, entice, or coerce any minor, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct using materials that have been mailed, shipped, and transported in an affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was transported using any means and facility of interstate and foreign commerce including by computer. This was in violation of Title 18, United State Code, § 2251(a), with reference to Title 18 United States Code, § 2251(e).

**COUNT 2**  
**SEXUAL EXPLOITATION OF A CHILD**  
**(PRODUCTION OF CHILD PORNOGRAPHY)**

On or about March 14, 2020, in the District of Kansas, the defendant,

**JEFFREY D. PIERCE**

did knowingly employ, use, persuade, induce, entice, or coerce any minor, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct using materials that have been mailed, shipped, and transported in an affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was transported using any means and facility of interstate and foreign commerce including by computer. This was in violation of Title 18, United State Code, § 2251(a), with reference to Title 18 United States Code, § 2251(e).

**COUNT 3**  
**SEXUAL EXPLOITATION OF A CHILD**  
**(POSSESSION OF CHILD PORNOGRAPHY)**

On or about September 2, 2020, in the District of Kansas, the defendant

**JEFFREY D. PIERCE**

did knowingly possess and knowingly access with intent to view at least one (1) matter which contained any visual depiction of minors that had been shipped and transported using any means and facility of interstate and foreign commerce, including by computer and was produced using materials which had been mailed and shipped and transported using any means and

facility of interstate and foreign commerce and the production of such visual depictions involved the use of minors engaging in sexually explicit conduct as defined in Title 18, United States Code, § 2256, and such visual depictions were of such conduct. This was in violation of Title 18, United State Code, § 2252(a)(4)(B), with reference to Title 18 United States Code, § 2252(b)(2).

**FORFEITURE NOTICE**

1. The allegations contained in Counts 1 through 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

2. Upon conviction of the offenses identified in Counts 1 through 3, the defendant,

**JEFFREY D. PIERCE,**

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 2253(a), any and all property used or intended to be used in any manner or part to commit or to promote the commission of such offenses or any property traceable to such property.

**A TRUE BILL.**

September 16, 2020  
DATE

s/Foreperson  
FOREPERSON OF THE GRAND JURY

s/ Stephen A. Hunting, #21648

for Brian C. Rabbitt, Acting Assistant Attorney General of the Criminal Division

Attorney for the United States, Acting under Authority Conferred by 28 U.S.C. § 515

[It is requested that trial be held in Topeka, Kansas.]

### **PENALTIES**

#### **Count 1 and 2: 18 U.S.C. §§ 2251(a) & 2251(e)**

- NLT than 15 years and NMT than 30 years imprisonment
- NMT \$250,000 fine
- NLT 5 years and NMT Life supervised release
- Restitution
- NMT \$35,000 child pornography assessment
- \$5,000 JVT A assessment (pursuant to 18 U.S.C. 3014(a)(3))
- \$100 special assessment fee

If the defendant has a prior conviction relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward:

- NLT 25 years and NMT 50 years imprisonment
- NMT \$250,000 fine
- NLT 5 years and NMT Life supervised release
- Restitution
- NMT \$35,000 child pornography assessment
- \$5,000 JVT A assessment (pursuant to 18 U.S.C. 3014(a)(3))
- \$100 special assessment fee

If the defendant has two or more prior convictions relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward:

- NLT 35 years and NMT Life
- NMT \$250,000 fine
- NLT 5 years and NMT Life supervised release

- Restitution
- NMT \$35,000 child pornography assessment
- \$5,000 JVRTA assessment (pursuant to 18 U.S.C. 3014(a)(3))
- \$100 special assessment fee

**Count 3: 18 U.S.C. §§ 2252(a)(4)(B) & 2252(b)(2)**

- NMT 10 years imprisonment
- NMT \$250,000 fine
- NLT 5 years and NMT Life supervised release
- Restitution
- NMT \$17,000 child pornography assessment
- \$5,000 JVRTA assessment (pursuant to 18 U.S.C. 3014(a)(3))
- \$100 special assessment fee

If the defendant is found to have possessed any matter that involved prepubescent minors or minors who have not attained 12 years of age the penalties are:

- NMT 20 years imprisonment
- NMT \$250,000 fine
- NLT 5 years and NMT Life supervised release
- Restitution
- NMT \$17,000 child pornography assessment
- \$5,000 JVRTA assessment (pursuant to 18 U.S.C. 3014(a)(3))
- \$100 special assessment fee

If the defendant has a prior conviction relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward:

- NLT 10 years and NMT 20 years imprisonment
- NMT \$250,000 fine
- NLT 5 years and NMT Life supervised release
- Restitution
- NMT \$17,000 child pornography assessment
- \$5,000 JVRTA assessment (pursuant to 18 U.S.C. 3014(a)(3))
- \$100 special assessment fee