

UNITED STATES DISTRICT COURT  
District of Minnesota

UNITED STATES OF AMERICA,

INDICTMENT *CR 15-88 SRN/JJK*

Plaintiff,

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

v.

18 U.S.C. § 2253(a)

ANDREW L. SCHILLER,

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

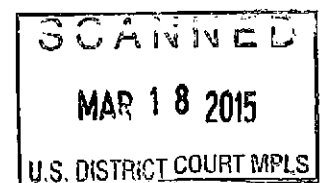
**COUNT 1**

(Sexual Exploitation of Children)

Between on or about September 23, 2013 and on or about January 12, 2014, in the State and District of Minnesota, the defendant,

**ANDREW L. SCHILLER,**

did knowingly employ, use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and attempt to do so, namely, a computer image file entitled "AB4503D1-F4C9-49CA-B2AE-E33145E29211.jpg," knowing and having reason to know such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which visual depiction was transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, all in violation of Title 18, United State Code, Sections 2251(a) and (e).



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**FORFEITURE ALLEGATIONS**

Count 1 of this Indictment is 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 offense, the defendant,

**ANDREW L. SCHILLER,**

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 the following:

One Asus laptop S/N C1N0AS14871602B containing Hitachi hard drive  
One Samsung Galaxy Tablet S/N R61BC67500M  
One Samsung SCH-T769 cellular phone S/N DW6B307FS/7-B

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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 2251(a) and (e) and 2253(a).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON