

FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

**BILL OF INFORMATION FOR PRODUCTION OF MATERIALS INVOLVING
THE SEXUAL EXPLOITATION OF CHILDREN, DISTRIBUTION OF CHILD
PORNOGRAPHY, RECEIPT OF CHILD PORNOGRAPHY,
AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
CHRISTOPHER M. SCHWAB	*	VIOLATIONS: 18 U.S.C. § 2251(a)
	*	18 U.S.C. § 2251(e)
	*	18 U.S.C. § 2252(a)(2)
	*	18 U.S.C. § 2252(b)(1)
	*	18 U.S.C. § 2253
	*	*
	*	*
	*	*

The United States Attorney charges that:

COUNT 1

Sexual Exploitation of a Child - Production of Child Pornography

Between on or about March 11, 2011, through on or about January 27, 2012, within the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTOPHER M. SCHWAB**, did knowingly employ, use, persuade, induce, entice, and coerce Minor Victim 1 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 and affecting interstate and foreign commerce by any means, including by computer.

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

COUNT 2

Sexual Exploitation of a Child - Production of Child Pornography

Between on or about November 10, 2012, to on or about May 5, 2013, within the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTOPHER M. SCHWAB**, did knowingly employ, use, persuade, induce, entice, and coerce Minor Victim 2 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 and affecting interstate and foreign commerce by any means, including by computer.

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

COUNT 3

Sexual Exploitation of a Child - Production of Child Pornography

Between on or about May 22, 2011, through on or about July 8, 2011, within the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTOPHER M. SCHWAB**, did knowingly employ, use, persuade, induce, entice, and coerce Minor Victim 3 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 and affecting interstate and foreign commerce by any means, including by computer.

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

COUNT 4

Sexual Exploitation of a Child - Production of Child Pornography

On or about June 4, 2011, within the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTOPHER M. SCHWAB**, did knowingly employ, use, persuade, induce, entice, and coerce Minor Victim 4 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 and affecting interstate and foreign commerce by any means, including by computer.

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

COUNT 5

Distribution of Child Pornography

Beginning at a time unknown and continuing until on or about July 31, 2013, within the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTOPHER M. SCHWAB**, did knowingly distribute, and attempt to distribute, visual depictions, that is, digital images and computer images, that had been mailed, shipped, and transported in interstate and foreign commerce, by any means, including by computer, the production of such visual depictions having involved the use of a minor engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), and such visual depictions were of such conduct.

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

COUNT 6

Receipt of Child Pornography

Beginning at a time unknown and continuing until on or about July 31, 2013, within the Eastern District of Louisiana and elsewhere, **CHRISTOPHER M. SCHWAB**, defendant herein, did knowingly receive, and attempt to receive, visual depictions, that is, digital images, computer images, and digital video files, that had been mailed, shipped, and transported in interstate and foreign commerce, by any means, including by computer, the production of such visual depictions having involved the use of a minor engaging in sexually explicit conduct as defined in Title 18, United States Code, Section 2256, and such visual depictions were of such conduct.

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

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 6 of this Bill of Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 2253.

2. As a result of the offenses alleged in Counts 1 through 6, defendant, **CHRISTOPHER SCHWAB**, shall forfeit to the United States all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and/or any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, in violation of Title 18, United States Code, Sections 2251(a), 2252(a)(2), and 2253, including but not limited to:

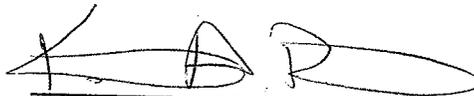
- a. 2008 Ford Mustang, VIN # 1ZVHT80N285169484;
- b. Apple Macbook A1181, Serial No. W87250TCYA9;
- c. Asus Model G51VX, Serial No. 98NOAS169552338;
- d. External Western Digital hard drive, Serial No. WCAZA4004545;
- e. Home-built computer, Serial No. RC9212KKN11112000830;
- f. iPhone 5, Serial No. C39JFAMQDTTQ.

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(o) to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

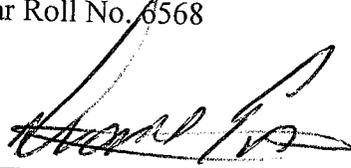
All in violation of Title 18, United States Code, Section 2253.



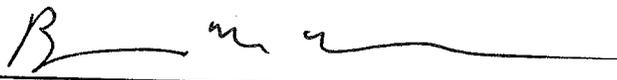
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New Orleans, Louisiana
October 28, 2013