

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Crim. No. 13-\_\_\_\_\_  
 :  
 v. : 18 U.S.C. § 2251(a)  
 : 18 U.S.C. § 2252A(a)(5)(B)  
 GREGORY JOHN SCHAFFER :  
 : INDICTMENT

The Grand Jury in and for the District of New Jersey,  
sitting at Newark, charges:

COUNT 1  
(Production of Child Pornography)

From in or about January 1, 2007 through in or about  
December 2010, in Hudson County, in the District of New Jersey,  
and elsewhere, defendant

GREGORY JOHN SCHAFFER

did knowingly employ, use, persuade, induce, entice, and coerce  
a minor, Child Victim #1, to engage in sexually explicit conduct  
for the purpose of producing a visual depiction of such conduct,  
which visual depiction was produced using materials that were  
mailed, shipped, and transported in and affecting interstate and  
foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section  
2251(a) and Section 2.

**COUNT 2**  
**(Production of Child Pornography)**

From in or about January 1, 2007 through in or about December 2010, in Hudson County, in the District of New Jersey, and elsewhere, defendant

**GREGORY JOHN SCHAFFER**

did knowingly employ, use, persuade, induce, entice, and coerce a minor, Child Victim #2, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, which visual depiction was produced using materials that were mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Section 2251(a) and Section 2.

**COUNT 3**  
**(Possession of Child Pornography)**

On or about June 3, 2012, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

**GREGORY JOHN SCHAFFER,**

did knowingly possess material that contained at least 3 images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which images were mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which images were produced using materials that were mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B) and Section 2.

FORFEITURE ALLEGATIONS

1. The allegations contained in this Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253.

2. Upon conviction of any offenses set forth in this Indictment, in violation of Title 18, United States Code, Sections 2252A, the defendant,

**GREGORY JOHN SCHAFFER,**

shall forfeit to the United States:

a. any and all matters that contain visual depictions of child pornography, in violation of the charged offenses;

b. any property constituting or traceable to gross profits or other proceeds obtained, directly or indirectly, from such offenses; and

c. any and all property used or intended to be used to commit and to promote the commission of the aforementioned offenses or any property traceable to such property, including but not limited to the following:

i. one ACER Aspire laptop computer, model number 7739, serial number unknown;

ii. a Gigaware external hard drive, serial

number unknown;

iii. one digital camera, serial number unknown; and

iv. one video camera, serial number unknown.

3. If any of the property described above, 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 party;

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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States

Code, Section 2461(c).

A TRUE BILL



*Paul J. Fishman*

PAUL J. FISHMAN  
United States Attorney

CASE NUMBER:

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**GREGORY JOHN SCHAFFER**

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**INDICTMENT FOR**

18 U.S.C. § 2251(a)  
18 U.S.C. § 2251A(a)(5)(B)

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**PAUL J. FISHMAN**  
*UNITED STATES ATTORNEY*  
*NEWARK, NEW JERSEY*

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ELIZABETH M. HARRIS  
*ASSISTANT U.S. ATTORNEY*  
*NEWARK, NEW JERSEY*  
*(973) 645-2913*

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