

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 16-_____**
v. : **DATE FILED:_____**
RALPH FISHER : **VIOLATIONS:**
: **18 U.S.C. § 2422(b) (attempted use of an**
: **interstate commerce facility to entice a**
: **minor to engage in sexual conduct - 1 count)**
: **18 U.S.C. § 1470 (attempted transfer of**
: **obscene material to minors – 1 count**
: **18 U.S.C. § 2423(b) (attempted interstate**
: **travel with the intent to engage in illicit**
: **sexual conduct with a minor - 1 count)**
: **18 U.S.C. § 2252(a)(2) (attempted**
: **distribution of child pornography – 1 count)**
: **18 U.S.C. § 2252(a)(4)(B) (possession of child**
: **pornography – 1 count)**
: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From on or about June 15, 2015 through on or about July 20, 2015, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

RALPH FISHER

used a facility and means of interstate and foreign commerce, that is, the Internet, to attempt to persuade, induce, entice and coerce Minor #1, a person whom FISHER believed was a minor child under the age of 18 years, to engage in sexual activity, for which any person could be charged with a criminal offense, and attempted to do so, that is, (i) attempted transfer of obscene materials to a minor, in violation of 18 U.S.C. § 1470, (ii) attempted involuntary deviate sexual intercourse, in

violation of 18 Pa.C.S. §901 and 3123, and (iii) attempted indecent assault of a minor, in violation of 18 Pa.C.S. §901 and 3126.

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 12, 2015, in the Eastern District of Pennsylvania, the District of Maryland, and elsewhere, defendant

RALPH FISHER,

using a means or facility of interstate commerce, knowingly transferred an obscene matter to another individual whom FISHER believed had not attained the age of 16 years, and attempted to do so.

In violation of Title 18, United States Code, Section 1470.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 20, 2015, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

RALPH FISHER

traveled in interstate commerce, that is, from the State of Maryland to the Commonwealth of Pennsylvania, for the purpose of engaging in illicit sexual conduct with a minor, and did attempt to do so.

In violation of Title 18, United States Code, Section 2423(b).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 19, 2015, in the Eastern District of Pennsylvania, in the District of Maryland, and elsewhere, the defendant,

RALPH FISHER

knowingly distributed visual depictions that had been shipped in interstate and foreign commerce, and attempted to do so, which visual depictions showed a minor engaged in sexually explicit conduct and the producing of those visual depictions involved the use of a minor engaged in sexually explicit conduct.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 20, 2015, in the Eastern District of Pennsylvania, the District of Maryland, and elsewhere, the defendant,

RALPH FISHER

knowingly possessed books, magazines, periodicals, films, video tapes and other matter, namely a cellular telephone, which contained visual depictions that had been shipped and transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce.

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 2422(b), 2423(b), 2252(a)(2), and 2252(a)(4)(B), as set forth in this indictment, defendant

RALPH FISHER

shall forfeit to the United States of America any visual depiction charged in the indictment, and any matter containing such visual depictions, and 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(b), 2423(b), 2252(a)(2), and 2252(a)(4)(B), as charged in this indictment, including, but not limited to:

1. One Apple iPhone 6, IMEI #359232067825741; and
2. A maroon 2003 GMC Yukon

If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

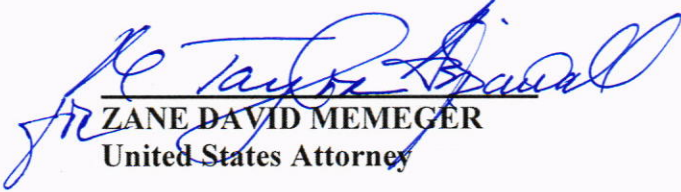
1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. has been comingled with other property which cannot be divided,

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2253(b) incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

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

A TRUE BILL:

GRAND JURY FOREPERSON



ZANE DAVID MEMEGER
United States Attorney