

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

MATTHEW MURPHY,

Defendant

) Criminal No. 19CR10286
)
) Violations:
)
) Counts One Through Five:
) Sexual Exploitation of Children
) (18 U.S.C. §§ 2251(a) and (e))
)
) Forfeiture Allegation:
) (18 U.S.C. § 2253)

INDICTMENT

COUNT ONE

Sexual Exploitation of Children
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury charges:

On various dates beginning on a date unknown to the Grand Jury, but no later than in June 2017, and continuing through March 26, 2019, in the District of Massachusetts, the defendant,

MATTHEW MURPHY,

using Snapchat username “sarah.shay1,” did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was actually transported and transmitted using any means and facility of and in and affecting interstate and foreign commerce, and attempted to do so.

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

COUNT TWO
Sexual Exploitation of Children
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates beginning on a date unknown to the Grand Jury, but no later than in June 2017, and continuing through March 26, 2019, in the District of Massachusetts, the defendant,

MATTHEW MURPHY,

using Snapchat username “mikala-shaw,” did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was actually transported and transmitted using any means and facility of and in and affecting interstate and foreign commerce, and attempted to do so.

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

COUNT THREE
Sexual Exploitation of Children
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates beginning on a date unknown to the Grand Jury, but no later than in June 2017, and continuing through March 26, 2019, in the District of Massachusetts, the defendant,

MATTHEW MURPHY,

using Snapchat username “emilyhunter.16,” did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was actually transported and transmitted using any means and facility of and in and affecting interstate and foreign commerce, and attempted to do so.

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

COUNT FOUR
Sexual Exploitation of Children
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates beginning on a date unknown to the Grand Jury, but no later than in June 2017, and continuing through March 26, 2019, in the District of Massachusetts, the defendant,

MATTHEW MURPHY,

using Snapchat username “mattyc.1234,” did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was actually transported and transmitted using any means and facility of and in and affecting interstate and foreign commerce, and attempted to do so.

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

COUNT FIVE
Sexual Exploitation of Children
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges:

On various dates beginning on a date unknown to the Grand Jury, but no later than in June 2017, and continuing through March 26, 2019, in the District of Massachusetts, the defendant,

MATTHEW MURPHY,

using Snapchat “lastchaneb4-911,” did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was actually transported and transmitted using any means and facility of and in and affecting interstate and foreign commerce, and attempted to do so.

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

CHILD PORNOGRAPHY/CHILD EXPLOITATION FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

The Grand Jury further finds:

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 2251(a) and (e), set forth in Counts One through Five of this Indictment, the defendant,

MATTHEW MURPHY,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, 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; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

- a. Dell Inspiron Laptop bearing serial number 26HZ0F2
- b. MacBook Air bearing serial number CO2MQ7FCG083
- c. iPad with black case bearing serial number DMP5214WGXPY
- d. iPad bearing serial number DMPJD7BGF185
- e. Apple iPhone bearing serial number GHJWP1H9JCLY

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant—

- f. cannot be located upon the exercise of due diligence;
- g. has been transferred or sold to, or deposited with, a third party;

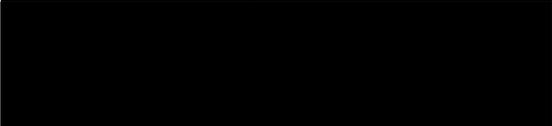
- h. has been placed beyond the jurisdiction of the Court;
- i. has been substantially diminished in value; or
- j. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Sections 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 described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL


FOREPERSON


ANNE PARUTI
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: AUGUST 8, 2019
Returned into the District Court by the Grand Jurors and filed.



