

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 14-**  
**v.** : **DATE FILED: \_\_\_\_\_**  
**MATTHEW KRAPF** : **VIOLATIONS:**  
: **18 U.S.C. § 2251(a), 2251(e) (using or**  
: **inducing a child to pose for child**  
: **pornography images - 10 counts)**  
: **18 U.S.C. § 2422(b) (use of an interstate**  
: **commerce facility to entice a minor to**  
: **engage in sexual conduct - 10 counts)**  
: **18 U.S.C. § 2252(a)(2) (distribution of**  
: **child pornography - 3 counts)**  
: **18 U.S.C. § 2252(a)(4) (possession of child**  
: **pornography – 1 count)**  
: **18 U.S.C. § 2 (aiding and abetting)**  
: **Notice of forfeiture**

**INDICTMENT**

**COUNTS ONE TO TEN**

**THE GRAND JURY CHARGES THAT:**

On or about the dates listed below, each date constituting a separate count, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

**MATTHEW KRAPF,**

employed, used, persuaded, induced, enticed, and coerced, and attempted to employ, use, persuade, induce, entice, and coerce, and aided and abetted the employment, use, persuasion, inducement, enticement, and coercion of the minors below listed in each count to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and defendant KRAPF knew and had reason to know that the visual depiction would be transported or transmitted using a facility of interstate and foreign commerce (that is, the Internet) and in and

affecting interstate and foreign commerce, and the visual depiction was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

<b>Count</b>	<b>Date of Offense</b>	<b>Victim</b>	<b>Location</b>
One	January 21, 2005	Minor #1.	Langhorne, PA
Two	February 16, 2005	Minor #1	Levittown, PA
Three	September 8, 2005	Minor #1	Levittown, PA
Four	December 4, 2012	Minor #2	Limerick , PA
Five	July 26, 2013	Minor #2	Limerick, PA
Six	October 1, 2013	Minor #2	Limerick, PA
Seven	July 22, 2013	Minor #3	Schwenksville, PA
Eight	July 22, 2013	Minor #4	Limerick, PA
Nine	July 26, 2013	Minor #4.	Limerick, PA
Ten	August 27, 2013	Minor #5	Collegeville, PA

All in violation of Title 18, United States Code, Sections 2251(a), 2251(e), and 2.

**COUNTS ELEVEN THROUGH TWENTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, each date constituting a separate count, in the Eastern District of Pennsylvania, the defendant,

**MATTHEW KRAPF,**

used a facility and means of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice and coerce the minors listed below, none of whom had attained the age of 18 years, to engage in sexual activity for which any person could be charged with a criminal offense.

<b>Count</b>	<b>Date of Offense</b>	<b>Victim</b>	<b>Location</b>
Eleven	January 21, 2005	Minor #1.	Langhorne, PA
Twelve	February 16, 2005	Minor #1	Levittown, PA
Thirteen	September 8, 2005	Minor #1	Levittown, PA
Fourteen	December 4, 2012	Minor #2	Limerick , PA
Fifteen	July 26, 2013	Minor #2	Limerick, PA
Sixteen	October 1, 2013	Minor #2	Limerick, PA
Seventeen	July 22, 2013	Minor #3	Schwenksville, PA
Eighteen	July 22, 2013	Minor #4	Limerick, PA
Nineteen	July 26, 2013	Minor #4.	Limerick, PA
Twenty	August 27, 2013	Minor #5	Collegetown, PA

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

**COUNTS TWENTY-ONE THROUGH TWENTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, each date constituting a separate count, in the Eastern District of Pennsylvania, defendant

**MATTHEW KRAPF,**

knowingly distributed visual depictions that had been shipped in interstate and foreign commerce, which visual depictions showed minors engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors engaged in sexually explicit conduct.

<b>Count</b>	<b>Date of Offense</b>
Twenty-One	July 22, 2013
Twenty-Two	July 25, 2013
Twenty-Three	July 26, 2013

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

**COUNT TWENTY-FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 2, 2013, in the Eastern District of Pennsylvania, defendant

**MATTHEW KRAPF,**

knowingly possessed books, magazines, periodicals, films, video tapes and other matter, namely a cellular telephone, laptop computers, external hard drives, computer hard drives, CDs and DVDs, VHS tapes, camcorder videotapes, and related computer equipment, which contained visual depictions that had been produced using materials, which had been shipped and transported in interstate and foreign commerce. The production of these visual depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of minors engaging in sexually explicit conduct.

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 2251(a), 2422(b), 2252(a)(2) and 2252(a)(4), as set forth in this indictment, defendant

**MATTHEW KRAPF,**

shall forfeit to the United States of America 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 2251(a), 2422(b), 2252(a)(2) and 2252(a)(4), as charged in this indictment, including, but not limited to:

1. One iPhone, model #A429, owned by Matthew Krapf, serial number C39KX3XLF8H5;
2. Dell laptop Studio 1558 computer bearing serial number CN0874P6486430791439A00;
3. 140 CDs/DVDs;
4. One Western Digital MyBook USB cable, serial number WCANK4468744;
5. One Dell XPS 400, serial number HNG4Y81;
6. One Western Digital external hard drive, serial number WCAPW0712144;
7. One Western Digital USM, serial number WXNY08KU0618;
8. One Dell latitude D530, serial number CN0HP728486438226301.

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

**A TRUE BILL:**

\_\_\_\_\_  
**GRAND JURY FOREPERSON**

\_\_\_\_\_  
**ZANE DAVID MEMEGER**  
United States Attorney