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UNITED STATES OF AMERICA

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

FEB 12 2003

at 10 o'clock and 30 min. a.m.
WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 02-00062 HG
)	
Plaintiff,)	SUPERSEDING INDICTMENT
)	
vs.)	18 U.S.C. §§ 2422(b)
)	[Attempted Enticement of
)	a Minor]
)	18 U.S.C. § 1470
THOMAS M. SCHNEPPER,)	[Attempted Transfer of Obscene
)	Materials to a Minor]
)	18 U.S.C. § 2252
)	[Child Pornography]
)	

SUPERSEDING INDICTMENT

COUNT 1

The Grand Jury charges:

From on or about December 4, 2001 through on or about February 15, 2002, in the District of Hawaii and elsewhere, THOMAS M. SCHNEPPER, using the Internet, a facility and means of interstate commerce, did knowingly attempt to persuade, induce

and entice an individual who had not attained the age of 18 years, to engage in sexual activity for which said Thomas M. Schnepfer could be charged with a criminal offense, namely, sexual assault in the first degree, a violation of Hawaii state law.

All in violation of Title 18, United States Code, section 2422(b).

COUNT 2

The Grand Jury further charges:

On or about December 11, 2001, in the District of Hawaii and elsewhere, THOMAS M. SCHNEPPER, using the Internet, a facility and means of interstate commerce, did knowingly attempt to transfer obscene material, namely, a computer graphics file entitled "t,unit.jpg," to another individual who had not attained the age of 16 years, with said Thomas M. Schnepfer then knowing that such person had not attained the age of 16 years.

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

COUNT 3

The Grand Jury further charges:

On or about December 11, 2001, in the District of Hawaii and elsewhere, THOMAS M. SCHNEPPER, using the Internet, a facility and means of interstate commerce, did knowingly attempt to transfer obscene material, namely, a computer graphics file

entitled "tunit 3.jpg," to another individual who had not attained the age of 16 years, with said Thomas M. Schnepfer then knowing that such person had not attained the age of 16 years.

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

COUNT 4

The Grand Jury further charges:

On or about December 11, 2001, in the District of Hawaii and elsewhere, THOMAS M. SCHNEPPER, using the Internet, a facility and means of interstate commerce, did knowingly attempt to transfer obscene material, namely, a computer graphics file entitled "tunit 4.jpg," to another individual who had not attained the age of 16 years, with said Thomas M. Schnepfer then knowing that such person had not attained the age of 16 years.

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

COUNT 5

The Grand Jury further charges:

On or about December 11, 2001, in the District of Hawaii and elsewhere, THOMAS M. SCHNEPPER, using the Internet, a facility and means of interstate commerce, did knowingly attempt to transfer obscene material, namely, a computer graphics file entitled "tunit 5.jpg," to another individual who had not

attained the age of 16 years, with said Thomas M. Schnepfer then knowing that such person had not attained the age of 16 years.

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

COUNT 6

The Grand Jury further charges:

On or about December 13, 2001, in the District of Hawaii and elsewhere, THOMAS M. SCHNEPPER, using the Internet, a facility and means of interstate commerce, did knowingly attempt to transfer obscene material, namely, a computer graphics file entitled "tunit 6.jpg," to another individual who had not attained the age of 16 years, with said Thomas M. Schnepfer then knowing that such person had not attained the age of 16 years.

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

COUNT 7

The Grand Jury further charges:

On or about December 13, 2001, in the District of Hawaii and elsewhere, THOMAS M. SCHNEPPER, using the Internet, a facility and means of interstate commerce, did knowingly attempt to transfer obscene material, namely, a computer graphics file entitled "corynme01.jpg," to another individual who had not attained the age of 16 years, with said Thomas M. Schnepfer then knowing that such person had not attained the age of 16 years.

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

COUNT 8

The Grand Jury further charges:

On or about December 13, 2001, in the District of
Hawaii and elsewhere, THOMAS M. SCHNEPPER, by means of a
computer, did knowingly transport and ship, and attempt to
transport and ship, in interstate commerce, a visual depiction
the production of which involved the use of a minor engaged in
sexually explicit conduct, namely, a computer file entitled
"Mandy taken a dare for \$100.jpg," with said Thomas M. Schnepfer
then knowing that the production of such visual depiction
involved the use of a minor engaged in sexually explicit conduct,
and that such visual depiction was of such conduct.

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In violation of Title 18, United States Code, section
2252 (a) (1) and (b) (1).

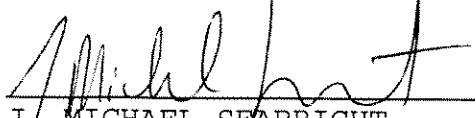
DATED: Honolulu, Hawaii, February 12, 2003.

A TRUE BILL

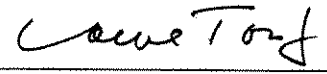
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FOREPERSON, GRAND JURY

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United States v. Thomas M. Schnepfer
"Superseding Indictment"
Cr. No. 02-0062 HG _____