IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

U.S. DISTRICT COURT DISTRICT OF NEBRASKA 2022 FEB 24 PM 5: 09

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UNITED STATES OF AMERICA,

CHRISTOPHER GROTH,

VS.

Defendant.

Plaintiff,

INDICTMENT 18 U.S.C. § 2251(a) 18 U.S.C. § 2252(a)(1) 18 U.S.C. § 2252(a)(4)(B)

The Grand Jury charges that

COUNT I

Beginning or about September of 2020 and continuing to on or about December of 2020, within the District of Nebraska, CHRISTOPHER GROTH, the defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, Victim 1, to engage in sexually explicit conduct and acts that are indistinguishable from that of a minor engaging in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce; and using materials that have been 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, Sections 2251(a).

COUNT II

On or about February 2, 2021, within the District of Nebraska, CHRISTOPHER GROTH, the defendant herein, did knowingly transport and ship, using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, including by

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computer, any visual depiction, the production of such visual depiction having involved the use of a minor engaging in sexually explicit conduct and such visual depiction being of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(1).

COUNT III

On or about June 3, 2021, in the district of Nebraska, CHRISTOPHER GROTH, the defendant herein, did knowingly possess one or more computer files and other matter which contained an image of child pornography, the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct, said computer files and other matter had been shipped or transported in interstate commerce by any means, including by computer including images of child pornography, involving prepubescent minors or minors who had not attained 12 years of age.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

A TRUE BILL

FOREPERSON

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.

TE\$SIE L. SMITH

Assistant United States Attorney