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FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

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CLERK'S OFFICE
AT GREENBELT

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

MOSHE MICHAEL IMEL,

Defendant

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CRIMINAL NO. TDC21CR461

(Production of Child Pornography,
18 U.S.C. § 2251(a); Forfeiture,
18 U.S.C. § 2253, 21 U.S.C. § 853(p))

INDICTMENT

COUNT ONE

(Production of Child Pornography)

The Grand Jury for the District of Maryland charges that:

On or about July 22, 2018, in the District of Maryland, the defendant,

MOSHE MICHAEL IMEL,

attempted to and did knowingly employ, use, persuade, induce, entice, and coerce a minor, Victim A, to engage in any sexually explicit conduct as defined in 18 U.S.C. § 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT TWO
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about August 4, 2018, in the District of Maryland, the defendant,

MOSHE MICHAEL IMEL,

attempted to and did knowingly employ, use, persuade, induce, entice, and coerce a minor, Victim A, to engage in any sexually explicit conduct as defined in 18 U.S.C. § 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT THREE
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about November 4, 2020, in the District of Maryland, the defendant,

MOSHE MICHAEL IMEL,

attempted to and did knowingly employ, use, persuade, induce, entice, and coerce a minor, Victim B, to engage in any sexually explicit conduct as defined in 18 U.S.C. § 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT FOUR
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about November 7, 2020, in the District of Maryland, the defendant,

MOSHE MICHAEL IMEL,

attempted to and did knowingly employ, use, persuade, induce, entice, and coerce a minor, Victim B, to engage in any sexually explicit conduct as defined in 18 U.S.C. § 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

COUNT FIVE
(Production of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about November 26, 2020, in the District of Maryland, the defendant,

MOSHE MICHAEL IMEL,

attempted to and did knowingly employ, use, persuade, induce, entice, and coerce a minor, Victim B, to engage in any sexually explicit conduct as defined in 18 U.S.C. § 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

18 U.S.C. § 2251(a)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Federal Rule of Criminal Procedure 33.2, notice is hereby given to the defendant that the United States of America will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 2253 and 21 U.S.C. § 853(p) as a result of the defendant's conviction of the offenses charged in Counts One through Five of this Indictment.

Production of Child Pornography Forfeiture

2. Pursuant to 18 U.S.C. § 2253, upon conviction of the offenses set forth in Counts One through Five of this Indictment, in violation of 18 U.S.C. § 2251, the defendant,

MOSHE MICHAEL IMEL,

shall forfeit to the United States of America:

- a. Any visual depiction described in 18 U.S.C. §§ 2251, 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 Title 18, United States Code, Chapter 110;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and
- c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

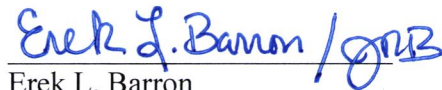
Substitute Assets

3. If, as a result of any act or omission of the defendant, any of the property described above:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).

18 U.S.C. § 2253
21 U.S.C. § 853(p)


Erek L. Barron
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

Date: November 18, 2021