

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 15-**  
**v.** : **DATE FILED: \_\_\_\_\_**  
**MARK HAYNES,** : **VIOLATIONS:**  
**a/k/a "Katie Caponetti"** : **18 U.S.C. § 2422(b) (use of an interstate**  
: **commerce facility to entice a minor to**  
: **engage in sexual conduct – 1 count)**  
: **18 U.S.C. § 1470 (transfer of obscene**  
: **material to a minor – 2 counts)**  
: **18 U.S.C. § 2252(a)(2) (distribution of**  
: **child pornography – 2 counts)**  
: **18 U.S.C. § 2252(a)(4)(B) (possession of**  
: **child pornography – 1 count)**  
: **18 U.S.C. § 1519 (destruction or**  
: **concealment of evidence – 1 count)**  
: **18 U.S.C. § 2 (aiding and abetting**  
: **Notice of forfeiture**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

In or about January 2010 through February 2010, in West Chester, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

**MARK HAYNES,  
a/k/a "Katie Caponetti"**

used a facility and means of interstate and foreign commerce, that is, the Internet, to persuade, induce, entice and coerce Minor #1, who had not attained the age of 18 years, to engage in sexual activity, for which any person could be charged with a criminal offense.

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

**COUNTS TWO AND THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about February 18, 2010 and February 20, 2010, each date constituting a separate act, in West Chester, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

**MARK HAYNES,  
a/k/a "Katie Caponetti"**

using a means or facility of interstate commerce, knowingly transferred an obscene matter to another individual who had not attained the age of 16 years.

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

**COUNTS FOUR AND FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 27, 2014 and April 28, 2014, each date constituting a separate act, in West Chester, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

**MARK HAYNES,  
a/k/a "Katie Caponetti"**

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

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

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 23, 2014, West Chester, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

**MARK HAYNES,  
a/k/a "Katie Caponetti"**

knowingly possessed books, magazines, periodicals, films, video tapes and other matter, namely a computer, 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).

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

In or about October 2014 through February 2015, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

**MARK HAYNES,  
a/k/a "Katie Caponetti"**

knowingly concealed and covered up a tangible object, and aided and abetted the concealment and covering up of a tangible object, that is, a laptop computer, and defendant HAYNES knowing that he was under investigation by law enforcement regarding his online involvement with minors and child pornography, with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of the United States, and he did attempt to do so.

In violation of Title 18, United States Code, Sections 1519 and 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 2422(b), 1470, 2252(a)(2), and 2252(a)(4)(B), as set forth in this indictment, defendant

**MARK HAYNES,  
a/k/a "Katie Caponetti"**

shall forfeit to the United States of America:

(a) any visual depiction, or any film, videotape, or other matter which contains any child pornography, which was produced, transported, mailed, shipped, or received as a result of such violations as charged in the indictment;

(b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violations; and

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violations, including, but not limited to:

- (1) Apple iMac computer, serial number D25JW0RADHJW;
- (2) Apple iPad Table, serial number DMPK3KX2F186;
- (3) Apple iPod MP3 Player, serial number DJ6K10ZXDN0;
- (4) Apple iPod MP3 Player, serial number CCQKL1N7JFD;
- (5) Apple iPhone 5 Cellular Telephone, IMEI: 013330005100769.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (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;

it is the intent of the United States, pursuant to Title 18, United States Code, Sections 1467 and 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 1467 and 2253.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**ZANE DAVID MEMEGER**  
United States Attorney