

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Crim. No.
	:	
v.	:	18 U.S.C. §§ 2422(b)
	:	18 U.S.C. §§ 2252A(a)(2)(A)
KEVIN VAN PELT	:	18 U.S.C. §§ 2252A(a)(5)(B) & (b)(2)
	:	

I N F O R M A T I O N

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

**COUNT ONE**  
**(Online Enticement of a Minor to Engage in Criminal Sexual Conduct)**

From in or around August 2018 through in or around October 2018, in Ocean County, in the District of New Jersey, and elsewhere, the defendant, KEVIN VAN PELT, using the mail and any facility and means of interstate and foreign commerce, did knowingly persuade, induce, entice, and coerce, and attempt to persuade, induce, entice, and coerce, MINOR VICTIM 1, an individual who had not attained the age of eighteen years, to engage in sexual activity, believing that MINOR VICTIM 1 was under the age of eighteen, for which any person could be charged with a criminal offense.

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

**COUNT TWO**  
**(Distribution of Child Pornography)**

From in or around December 2017 through in or around March 2019, in Ocean County, in the District of New Jersey and elsewhere, the defendant,

KEVIN VAN PELT,

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), which had been mailed, and using any means and facility of interstate and foreign commerce, 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 2252A(a)(2)(A).

**COUNT THREE**  
**(Possession of Prepubescent Child Pornography)**

On or about May 1, 2019, in Ocean County, in the District of New Jersey and elsewhere, the defendant,

KEVIN VAN PELT,

did knowingly possess material that contained at least three images and videos of child pornography, as defined in Title 18, United States Code, Section 2256(8), involving a prepubescent minor or a minor who had not attained 12 years of age, that had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had 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 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION

1. The allegations above and on pages 1, 2, and 3 of this Information hereby are realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253(a).

2. Upon conviction of the violations of Title 18, United States Code, Sections 2422(b), 2252A(a)(2)(A), and 2252A(a)(5)(B) charged in Counts One through Three of this Information, the defendant,

KEVIN VAN PELT,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253,

- a. any visual depiction described in 18 U.S.C. §§ 2251, 2251A, 2252, 2252A, 2252B, or 2260, 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 18 U.S.C. Part I, Chapter 110;
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in this Information, and all property traceable to such property; and
- c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, and all property traceable to such property.

3. The property to be forfeited includes, but is not limited to, all of the defendant's right, title, and interest in the following property seized from the defendant's residence on or about May 1, 2019:

- a. an Apple MacBook Air laptop, bearing serial number C1MVJ771J1WK; and
  - b. a black Apple iPhone cellular telephone, in a black Tech 21 case.
4. If any of the property described above, 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).



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PHILIP R. SELLINGER  
United States Attorney

**CASE NUMBER:**

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District of New Jersey**

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**v.**

**KEVIN VAN PELT**

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**INFORMATION FOR**

**18 U.S.C. § 2422(b)  
18 U.S.C. § 2252A(a)(2)(A)  
18 U.S.C. §§ 2252A(a)(5)(B) & (b)(2)**

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**PHILIP R. SELLINGER**  
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*NEWARK, NEW JERSEY*

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*ASSISTANT U.S. ATTORNEY*  
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