

STATE OF INDIANA)
) SS:
COUNTY OF DUBOIS)

STATE OF INDIANA

VS

JOHN T. SCHNEIDER

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

SSN: (REDACTED)

IN THE DUBOIS CIRCUIT COURT

CAUSE NUMBER 19C01-2001-F5-000001

AMENDED INFORMATION FOR:

COUNT 1:

ATTEMPTED CHILD EXPLOITATION
I.C. 35-42-4-4(b)(4)(A) and I.C. 35-41-5-1
and I.C. 35-42-4-4(c)(2) and I.C. 35-41-5-1
LEVEL 4 FELONY

COUNT 2:

CHILD EXPLOITATION
I.C. 35-42-4-4(b)(4)(A) and I.C. 35-42-4-
4(c)(2)
LEVEL 4 FELONY

COUNT 3:

VOYEURISM
I.C. 35-45-4-5(b)(2) and I.C. 35-45-4-5(c)(1)
LEVEL 6 FELONY

COUNT 4:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(2)
LEVEL 5 FELONY

COUNT 5:

OBSTRUCTION OF JUSTICE
I.C. 35-44.1-2-2(a)(3)
LEVEL 6 FELONY

COUNT 6:

CHILD EXPLOITATION
I.C. 35-42-4-4(b)(4)(A) and I.C. 35-42-4-
4(c)(2)
LEVEL 4 FELONY

COUNT 7:

VOYEURISM
I.C. 35-45-4-5(b)(2) and I.C. 35-45-4-5(c)(1)
LEVEL 6 FELONY

COUNT 8:

POSSESSION OF CHILD PORNOGRAPHY
I.C. 35-42-4-4(d) and I.C. 35-42-4-4(e)(2)
LEVEL 5 FELONY

Count 1: On or about January 1, 2020 in Dubois County, State of Indiana, the following named defendant, John T. Schneider, acting with the culpability required to commit the crime of Child Exploitation (which is defined as, with the intent to arouse or satisfy the sexual desires of any person, knowingly or intentionally photographing, filming, or videotaping an incident

that includes the uncovered genitals of a child less than eighteen (18) years of age or the exhibition of the female breast with less than a fully opaque covering of any part of the nipple by a child less than eighteen (18) years of age), did point a phone, iPad, or other recording device at Victim 1, a child less than twelve (12) years of age, while Victim 1 was using the shower at the defendant's residence.

Count 2: On or about January 1, 2020 in Dubois County, State of Indiana, the following named defendant, John T. Schneider, with the intent to arouse or satisfy the sexual desires of any person, did knowingly or intentionally photograph, film, or videotape an incident that included the uncovered genitals of Victim 1, a child less than twelve (12) years of age, and/or the exhibition of the female breast with less than a fully opaque covering of any part of the nipple by Victim 1.

Count 3: On or about January 1, 2020 in Dubois County, State of Indiana, the following named defendant, John T. Schneider, did knowingly or intentionally peep without the consent of Victim 1 into an area where Victim 1 could reasonably be expected to disrobe, to-wit: a bathroom at the defendant's residence occupied by Victim 1, and the defendant knowingly or intentionally committed said offense by means of a camera.

Count 4: On or about January 1, 2020 in Dubois County, State of Indiana, the following named defendant, John T. Schneider, did knowingly or intentionally possess a picture, a photograph, a digitized image, or a pictorial representation that depicted or described sexual conduct by a child who John T. Schneider knew to be less than eighteen (18) years of age and that lacked serious literary, artistic, political or scientific value, to wit: a picture and/or a video of Victim 1 using the shower at the defendant's residence, and Victim 1 was less than twelve (12) years of age.

Count 5: On or between January 1, 2020 and January 3, 2020 in Dubois County, State of Indiana, the following named defendant, John T. Schneider, did alter, damage, or remove a thing, to wit: a picture and/or video of Victim 1 using the defendant's shower, with the intent to prevent said item from being produced or used as evidence in an official proceeding or investigation.

Count 6: On or about January 26, 2019 in Dubois County, State of Indiana, the following named defendant, John T. Schneider, with the intent to arouse or satisfy the sexual desires of any person, did knowingly or intentionally film or videotape an incident that included the uncovered genitals of Victim 1, a child less than twelve (12) years of age, to wit: Victim 1 using the toilet at the defendant's residence.

Count 7: On or about January 26, 2019 in Dubois County, State of Indiana, the following named defendant, John T. Schneider, did knowingly or intentionally peep without the consent of Victim 1 into an area where Victim 1 could reasonably be expected to disrobe, to-

wit: a bathroom at the defendant's residence occupied by Victim 1, and the defendant knowingly or intentionally committed said offense by means of a camera.

Count 8: On or between January 26, 2019 and January 3, 2020 in Dubois County, State of Indiana, the following named defendant, John T. Schneider, did knowingly or intentionally possess a digitized image or a pictorial representation that depicted or described sexual conduct by a child who John T. Schneider knew to be less than eighteen (18) years of age and that lacked serious literary, artistic, political or scientific value, to wit: a video of Victim 1 using the toilet at the defendant's residence, and Victim 1 was less than twelve (12) years of age.

All of which is contrary to the form of the Statute in such cases made and provided against the peace and dignity of the State of Indiana.

Dated: January 24, 2020

BRIAN D. LUCCHI
Deputy Prosecuting Attorney

WITNESSES:

Kaleb J. Chambers

Gregory Brescher

Martin Loya

Jeremy Lee

John Anderson

[REDACTED]

Victim 1

[REDACTED]