FILED At Albuquerque NM

IN THE UNITED STATES DISTRICT COURT

NOV 0 9 2011

FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN CLERK

UNITED STATES OF AMERICA,)
Plaintiff,) CRIMINAL NO. 11-2873
vs.	Count 1: 18 U.S.C. § 2422(b): Coercior and Enticement of a Minor;
JEFFREY NEAL JACKSON,	
) Count 2: 18 U.S.C. §§ 2423(b) and (f):
Defendant.) Travel with Intent to Engage in Illici
) Sexual Contact.

INDICTMENT

The Grand Jury charges:

Count 1

From on or about October 3, 2011, through or about October 24, 2011, in Curry County and elsewhere, in the District of New Mexico, the defendant, **JEFFREY NEAL JACKSON**, knowingly used a facility and means of interstate and foreign commerce, including email, a computer, and a cellular telephone, to knowingly persuade, induce, entice, and coerce, an individual he believed had not attained the age of 18 years, to engage in any sexual activity for which he could be charged with a criminal offense, that being criminal sexual penetration in the fourth degree in violation of N.M. Stat. Ann. § 30-9-11 (G).

In violation of 18 U.S.C. § 2422(b).

Count 2

On or about October 25, 2011, the defendant, **JEFFREY NEAL JACKSON**, knowingly traveled in interstate commerce from Texas to Clovis, Curry County, New Mexico, for the purpose of engaging in illicit sexual conduct with another person, that being a sexual act with a person he believed to be a fifteen-year-old girl, such sexual act being defined in 18 U.S.C. § 2246 and such sexual act would have been in violation of 18 U.S.C., Chapter 109A, had the sexual act occurred in the special maritime and territorial jurisdiction of the United States, that being sexual abuse of a minor in violation of 18 U.S.C. § 2243(a).

In violation of 18 U.S.C. §§ 2423(b) and (f).

FORFEITURE ALLEGATIONS

Upon conviction of any offense alleged in this indictment, the defendant JEFFREY

NEAL JACKSON, shall forfeit to the United States pursuant to 18 U.S.C. §§ 2422(b), 2251(a), 2423(b) and 2253 the following items:

- A). an I-Phone found in the defendant's custody at time of arrest;
- B). a Dell Lattitude E6500 Laptop, service number Ngtxnb-41tk0L1; and
- C). a Dell Lattitude D620 Laptop, service number F32s0F1.

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY

Assistant United States Attorney

- 11/08/11 10:20am