

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
UNITED STATES OF AMERICA :
 : SUPERSEDING
 : INFORMATION
 - v. - :
 : S3 11 Cr. 929 (PAE)
INOCENCIA ORTEGA, :
 a/k/a "Inocenci Ortega," :
 :
 Defendant. :
- - - - - x

COUNT ONE

(Conspiracy to Commit the Sexual Exploitation of a Child)

The United States Attorney charges:

1. In or about July 2011, in the Southern District of New York and elsewhere, INOCENCIA ORTEGA, a/k/a "Inocenci Ortega," the defendant, together with others known and unknown, wilfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Section 2251(b) of Title 18 of the United States Code.

2. It was a part and object of the conspiracy that INOCENCIA ORTEGA, a/k/a "Inocenci Ortega," the defendant, together with others known and unknown, being a parent, legal guardian, and person having custody and control of a minor, would and did knowingly permit such minor to engage in, and to assist any other person to engage in, sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing

and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, in violation of Title 18, United States Code, Section 2251(b).

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York:

a. In or about July 2011, INOCENCIA ORTEGA, a/k/a "Inocenci Ortega," the defendant, and a co-conspirator not named as a defendant herein ("CC-1") engaged in sexually explicit conduct in their home in the Bronx, New York while one of their minor children (the "Victim") filmed videos of it using a video camera.

b. In or about July 2011, CC-1 directed the Victim to film videos of ORTEGA and CC-1 engaging in sexually explicit conduct in the Bronx, New York, and CC-1 instructed the Victim on how to film those videos.

(Title 18, United States Code, Section 371.)

COUNT TWO

(False Statements)

The United States Attorney further charges:

4. On or about October 19, 2011, in the Southern District of New York, INOCENCIA ORTEGA, a/k/a "Inocenci Ortega," the defendant, willfully and knowingly, in a matter within the jurisdiction of the executive branch of the Government of the United States, did make a materially false, fictitious, and fraudulent statement and representation, to wit, in connection with a child exploitation investigation conducted by the United States Department of Homeland Security Investigations ("HSI"), ORTEGA falsely stated to two HSI agents that her children never told her that they had seen child pornography. However, in truth and in fact, the Victim had already told ORTEGA that the Victim had seen a video containing child pornography.

(Title 18, United States Code, Section 1001.)



PREET BHARARA
United States Attorney

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SUPERSEDING INFORMATION

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(18 U.S.C. §§ 371, 1001).

PREET BHARARA
United States Attorney.
