

LHE:LM
F. #2023R00078

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

JUSTIN DIXON,
Defendant.

----- X

THE GRAND JURY CHARGES:

COUNT ONE
(Sex Trafficking of a Minor)

1. In or about January 2023, within the Eastern District of New York and elsewhere, the defendant JUSTIN DIXON, together with others, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe #1, a minor whose identity is known to the Grand Jury, in and affecting interstate commerce, and did benefit, financially and by receiving anything of value, from participation in a venture which engaged in such acts, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means, would be used to cause Jane Doe #1 to engage in one or more commercial acts; and (2) Jane Doe #1 had not attained the age of 18 years and would be caused to engage in one or more commercial sex acts, having had a reasonable

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US DISTRICT COURT E.D.N.Y.
* FEBRUARY 28, 2023 *
BROOKLYN OFFICE

Judge William F. Kuntz, II
Magistrate Judge James R. Cho

I N D I C T M E N T

Cr. No. 23-CR-90

(T. 18, U.S.C., §§ 922(g)(1), 924(d)(1),
1591(a)(1), 1591(a)(2), 1591(b)(1),
1591(b)(2), 1591(c), 1594(d), 2251(a),
2251(e), 2422(b), 2428(a), 2253(a),
2253(b), 2 and 3551 *et seq.*; T. 21,
U.S.C., § 853(p); T. 28, U.S.C., §
2461(c))

opportunity to observe Jane Doe #1, and which offense was effected by means of force, threats of force, fraud and coercion, and a combination of such means.

(Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), 1591(b)(1), 1591(b)(2), 1591(c), 2 and 3551 et seq.)

COUNT TWO
(Coercion and Enticement of a Minor)

2. In or about January 2023, within the Eastern District of New York and elsewhere, the defendant JUSTIN DIXON, together with others, using one or more facilities and means of interstate and foreign commerce, to wit; the Internet and mobile Internet applications, did knowingly and intentionally persuade, induce, entice and coerce an individual who had not attained the age of 18 years, to wit: Jane Doe #1, to engage in prostitution.

(Title 18, United States Code, Sections 2422(b), 2 and 3551 et seq.)

COUNT THREE
(Sexual Exploitation of a Minor)

3. In or about January 2023, within the Eastern District of New York and elsewhere, the defendant JUSTIN DIXON, together with others, did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe #1, to engage in sexually explicit conduct, and attempt to do so, for the purpose of producing one or more visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and which would be in and affecting interstate and foreign commerce, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, to wit: one or more

mobile or Internet devices, computers, cameras and smartphones, and such visual depictions were actually transported and transmitted using one or more means and facilities of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a), 2251(e), 2 and 3551 et seq.)

COUNT FOUR
(Felon in Possession of a Firearm)

4. In or about January 2023, within the Eastern District of New York and elsewhere, the defendant JUSTIN DIXON, knowing that he had previously been convicted in a court of one or more crimes punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm, to wit: one black defaced Ruger LCP .380 auto pistol.

(Title 18, United States Code, Sections 922(g)(1) and 3551 et seq.)

COUNT FIVE
(Felon in Possession of a Firearm)

5. In or about January 2023, within the Eastern District of New York and elsewhere, the defendant JUSTIN DIXON, knowing that he had previously been convicted in a court of one or more crimes punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm, to wit: one black Taurus USA G2C 9mm pistol bearing serial number ACH191661.

(Title 18, United States Code, Sections 922(g)(1) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT ONE

6. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 1594(d), of (a) any property, real or

personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offense, and any property traceable to such property; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense, or any property traceable to such property.

7. If any of the above-described forfeitable property, 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 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 1594(d); Title 21, United States Code, Section 853(p))

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT TWO**

8. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2428(a), which requires the forfeiture of (a) any property, real or personal, that was used or intended to be used to commit or to facilitate

the commission of such offense; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

9. If any of the above-described forfeitable property, 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 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2428(a); Title 21, United States Code, Section 853(p))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT THREE

10. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Three, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253(a), which requires the forfeiture of (a) any visual depiction described in Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Title 18 of the United States Code, 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 such sections; (b) any property, real or personal, constituting,

or traceable to, gross profits or other proceeds obtained from such offense; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

11. If any of the above-described forfeitable property, 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 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 2253(a) and 2253(b); Title 21, United States Code, Section 853(p))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS FOUR AND FIVE

12. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged in Counts Four and Five, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition

involved in or used in any knowing violation of Title 18, United States Code, Sections 922 or Section 924, including but not limited to the following items:

- (a) one black defaced Ruger LCP .380 auto pistol recovered inside a 2017 BMW vehicle on or about January 27, 2023 in Brooklyn, New York; and
- (b) one black Taurus USA G2C 9mm pistol bearing serial number ACH191661 with A/O initials etched on body recovered inside a 2014 Infiniti Q50 vehicle on or about February 15, 2023 in the Bronx, New York.

13. If any of the above-described forfeitable property, 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 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

[REDACTED] / FOREPERSON

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

JUSTIN DIXON,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 922(g)(1), 924(d)(1), 1591(a)(1), 1591(a)(2), 1591(b)(1),
1591(b)(2), 1591(c), 1594(d), 2251(a), 2251(e), 2422(b), 2428(a), 2253(a),
2253(b), 2 and 3551 et seq.; T. 21, U.S.C., § 853(p), T. 28, U.S.C., § 2461(c))

A true bill

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Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Lorena Michelen, Assistant U.S. Attorney (718) 254-6475