

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ FEB 05 2020 ★

KDE:TH  
F. #2019R01574

BROOKLYN OFFICE

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

ORLANDO LOPEZ,

Defendant.

----- X

THE GRAND JURY CHARGES:

INDICTMENT

Cr. No. **CR 20-00052**

(T. 18, U.S.C. §§ 2241(c), 2246(2)(D),  
2251(a), 2251(e), 2252(a)(4)(B),  
2252(b)(2), 2253(a), 2253(b) and 3551  
et seq.; T. 21, U.S.C., § 853(p))

**KOMITEE, J.**

**POLLAK, M.J.**

COUNT ONE

(Travel with Intent to Commit Aggravated Sexual Abuse  
of a Minor Less Than 12 Years of Age)

1. In or about July 2018, within the Eastern District of New York, the District of New Jersey and elsewhere, the defendant ORLANDO LOPEZ did knowingly and intentionally cross a State line with intent to engage in a sexual act with a person who had not attained the age of 12 years, to wit: the intentional touching, not through the clothing, of the genitalia of Jane Doe #1, an individual whose identity is known to the Grand Jury, with an intent to abuse, humiliate, harass, degrade and arouse and gratify the sexual desire of one or more persons.

(Title 18, United States Code, Sections 2241(c), 2246(2)(D) and 3551 et seq.)

COUNT TWO

(Sexual Exploitation of a Child – Jane Doe #2)

2. On or about March 10, 2011, within the Eastern District of New York, the defendant ORLANDO LOPEZ did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe #2, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

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

COUNT THREE

(Sexual Exploitation of a Child – Jane Doe #2)

3. On or about August 27, 2011, within the Eastern District of New York, the defendant ORLANDO LOPEZ did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe #2, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

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

COUNT FOUR

(Sexual Exploitation of a Child – Jane Doe #3)

4. On or about February 15, 2012, within the Eastern District of New York, the defendant ORLANDO LOPEZ did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe #3, an individual whose

identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

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

COUNT FIVE

(Sexual Exploitation of a Child – Jane Doe #4)

5. On or about June 24, 2013, within the Eastern District of New York, the defendant ORLANDO LOPEZ did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe #4, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

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

COUNT SIX

(Sexual Exploitation of a Child – Jane Doe #1)

6. On or about May 12, 2015, within the Eastern District of New York, the defendant ORLANDO LOPEZ did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe #1, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

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

COUNT SEVEN

(Sexual Exploitation of a Child – John Doe #1)

7. On or about July 29, 2017, within the Eastern District of New York, the defendant ORLANDO LOPEZ did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: John Doe #1, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

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

COUNT EIGHT

(Sexual Exploitation of Children – Jane Does #4 and #5 and John Doe #1)

8. On or about August 9, 2017, within the Eastern District of New York, the defendant ORLANDO LOPEZ did knowingly and intentionally employ, use, persuade, induce, entice and coerce minors, to wit: Jane Doe #4, Jane Doe #5, an individual whose identity is known to the Grand Jury, and John Doe #1, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

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

COUNT NINE

(Sexual Exploitation of a Child – Jane Doe #5)

9. On or about March 23, 2018, within the Eastern District of New York, the defendant ORLANDO LOPEZ did knowingly and intentionally employ, use, persuade,

induce, entice and coerce a minor, to wit: Jane Doe #5, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

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

COUNT TEN

(Sexual Exploitation of a Child – Jane Doe #6)

10. On or about August 2, 2019, within the Eastern District of New York, the defendant ORLANDO LOPEZ did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe #6, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

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

COUNT ELEVEN

(Sexual Exploitation of a Child – John Doe #2)

11. On or about August 21, 2019, within the Eastern District of New York, the defendant ORLANDO LOPEZ did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: John Doe #2, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, which visual depictions were produced and

transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce.

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

COUNT TWELVE

(Possession of Child Pornography)

12. In or about and between January 2011 and October 2019, within the Eastern District of New York, the defendant ORLANDO LOPEZ did knowingly and intentionally possess matter which contained one or more visual depictions, to wit: images contained in digital files stored on hard drives, which were produced using materials which had been mailed, and had been shipped and transported using one or more means and facilities of interstate and foreign commerce and in and affecting interstate and foreign commerce, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

13. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, 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 Section 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 offenses; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property.

14. 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))

A TRUE BILL

A large black rectangular redaction box covering the signature area of the foreperson.

FOREPERSON



RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK



F.#: 2019R01574  
FORM DBD-34  
JUN. 85

No.

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

ORLANDO LOPEZ,

Defendant.

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**INDICTMENT**

T. 18, U.S.C. §§ 2241(c), 2246(2)(D), 2251(a), 2251(e), 2252(a)(4)(B),  
2252(b)(2), 2253(a), 2253(b) and 3551 *et seq.*; T. 21, U.S.C., § 853(p)

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*A true bill.*



J

*Foreperson*

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*Filed in open court this* \_\_\_\_\_ *day,*

*of* \_\_\_\_\_ *A.D. 20* \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

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*Bail, \$* \_\_\_\_\_

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*Tanya Hajjar, Assistant U.S. Attorney (718) 254-6109*

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ FEB 05 2020 ★

**INFORMATION SHEET**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**BROOKLYN OFFICE**

**CR 20 - 00052**

1. Title of Case: United States v. Orlando Lopez

2. Related Magistrate Docket Number(s): \_\_\_\_\_

3. Arrest Date: N/A

**KOMITEE, J.**

4. Nature of offense(s):  Felony  
 Misdemeanor

**POLLAK, M.J.**

5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3.2 of the Local E.D.N.Y. Division of Business Rules): \_\_\_\_\_

6. Projected Length of Trial: Less than 6 weeks   
More than 6 weeks

7. County in which crime was allegedly committed: Queens, New York  
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)

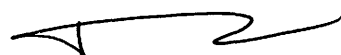
8. Was any aspect of the investigation, inquiry and prosecution giving rise to the case pending or initiated before March 10, 2012.<sup>1</sup>  Yes  No

9. Has this indictment/information been ordered sealed?  Yes  No

10. Have arrest warrants been ordered?  Yes  No

11. Is there a capital count included in the indictment?  Yes  No

RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY

By:   
\_\_\_\_\_  
Tanya Hajjar  
Assistant U.S. Attorney  
(718) 254-6109

<sup>1</sup> Judge Brodie will not accept cases that were initiated before March 10, 2012.