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F. #2021R00434

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

UNITED STATES OF AMERICA

- against -

JOSHUA LAMPLEY-REID,

Defendant.

INDICTMENT

CR 21 319

Cr. No. (T. 18, U.S.C., §§ 981(a)(1)(C),
1591(a)(1), 1591(a)(2), 1591(b)(1),
1591(b)(2), 1591(c), 1594(d), 2251(a),
2251(e), 2252(a)(1), 2252(b)(1),
2253(a), 2253(b), 2422(a), 2422(b),
2423(a), 2 and 3551 et seq.; T. 21,
U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c))

BROWN, J.

----- X

THE GRAND JURY CHARGES:

COUNT ONE

(Sex Trafficking of a Minor – Jane Doe #1)

WICKS, M.J.

1. In or about and between December 2019 and August 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOSHUA LAMPLEY-REID, 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 sex 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 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 – Jane Doe #1)

2. In or about and between December 2019 and August 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOSHUA LAMPLEY-REID, 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 – Jane Doe #1)

3. In or about and between December 2019 and August 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOSHUA LAMPLEY-REID, 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 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

(Transportation of Child Pornography – Jane Doe #1)

4. In or about and between December 2019 and August 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOSHUA LAMPLEY-REID, together with others, did knowingly and intentionally transport and ship, using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, one or more visual depictions, to wit: images depicting Jane Doe #1 engaged in sexually explicit conduct, the production of such visual depictions having involved the use of a minor engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(1), 2252(b)(1), 2 and 3551 et seq.)

COUNT FIVE
(Sex Trafficking of a Minor – Jane Doe #2)

5. In or about and between January 2020 and April 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOSHUA LAMPLEY-REID, together with others, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe #2, 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 Jane Doe #2 had not attained the age of 18 years and would be caused to engage in one or more commercial sex acts, and having had a reasonable opportunity to observe Jane Doe #2.

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

COUNT SIX
(Interstate Prostitution – Jane Doe #2)

6. In or about and between January 2020 and April 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOSHUA LAMPLEY-REID, together with others, did knowingly and intentionally persuade, induce, entice and coerce an individual, to wit: Jane Doe #2, to travel in interstate and foreign commerce to engage in prostitution.

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

COUNT SEVEN

(Transportation of a Minor – Jane Doe #2)

7. In or about and between January 2020 and April 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOSHUA LAMPLEY-REID, together with others, did knowingly and intentionally transport a person, to wit: Jane Doe #2, who had not attained the age of 18 years, in interstate commerce, with the intent that Jane Doe #2 engage in prostitution, and in sexual activity for which any person could be charged with a criminal offense.

(Title 18, United States Code, Sections 2423(a), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE AND FIVE

8. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged in Counts One and Five, 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 offenses, 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 offenses, or any property traceable to such property.

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

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS TWO THROUGH FOUR**

10. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged in Counts Two through Four, 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.

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 SIX AND SEVEN**

12. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged in Counts Six and Seven, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

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 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

FOREPERSON

MARK J. LESKO
ACTING 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.

JOSHUA LAMPLEY-REID,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 981(a)(1)(C), 1591(a)(1), 1591(a)(2), 1591(b)(1),
1591(b)(2), 1591(c), 1594(d), 2251(a), 2251(e), 2252(a)(1), 2252(b)(1),
2253(a), 2253(b), 2422(a), 2422(b), 2423(a), 2 and 3551 et seq.; T. 21,
U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.

Foreperson

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Megan E. Farrell, Assistant U.S. Attorney (631) 715-7862