

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

UNITED STATES OF AMERICA

v.

JORGE GUERRERO-TORRES

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CASE NO. 2:16cr68 FTH99cn

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

18 U.S.C. § 2252(a)(4)(B)

18 U.S.C. § 2252(b)(2)

INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning on an unknown date, but at least as early as in or about
December 2015, through on or about May 31, 2016, in Lee County and Orange
County, in the Middle District of Florida,

JORGE GUERRERO-TORRES,

defendant herein, did knowingly possess one or more matter(s) which contain a
visual depiction that had been produced using materials which had been mailed,
shipped, and transported, in interstate and foreign commerce, by any means
including by computer, where the production of such visual depiction involved the
use of a minor engaging in sexually explicit conduct, and such visual depiction is of
such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and
2252(b)(2).

COUNT TWO

Beginning on an unknown date, but at least as early as in or about December 2015, through on or about May 31, 2016, in Lee County, in the Middle District of Florida,

JORGE GUERRERO-TORRES,

defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and such visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

FORFEITURE

1. The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to the provision of Title 18, United States Code, Section 2253.

2. The defendant, Jorge Guerrero -Torres, shall forfeit to the United States of America, any visual depiction described in section 2251, 2251A, or 2252 of this chapter, 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 this chapter; any property, real or

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

The assets to be forfeited specifically include, but are not limited to, the following:

- a. a white Samsung cellular telephone, Model SM-G900P, DEC 256691517509905748, HEX 99000467972654, made in China;

3. If any of the property described above, 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,

the United States of America shall be entitled to forfeiture of substitute property under the provision of Title 18, United States Code, Section 2253(b).

Dated: 15 Jun 16

A TRUE BILL,

R S B
Foreperson

A. LEE BENTLEY, III
United States Attorney

By: Jesus M. Casas
Jesus M. Casas
Assistant United States Attorney
Chief, Fort Myers Division

By: Rachelle DesDunys Bedke
for Charles D. Schmitz
Assistant United States Attorney

UNITED STATES DISTRICT COURT
Middle District of Florida
Fort Myers Division

THE UNITED STATES OF AMERICA

vs.

JORGE GUERRERO-TORRES

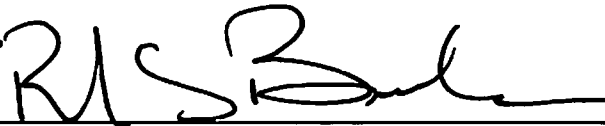
INDICTMENT

Violations:

18 U.S.C. §§ 2251(a) and 2251(e)

18 U.S.C. §§ 2252(a)(4)(B) and 2252(b)(2)

A true bill,



Foreperson

Filed in open court this 15th day
of June, 2016.

Clerk

Bail \$ _____
