

2024R00627/MJB

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

FILED

JUL 31 2025

AT 8:30 1:45 P.M.
CLERK, U.S. DISTRICT COURT - DNJ

UNITED STATES OF AMERICA : Hon.
v. :
BOBBYJEAN ORAK : Crim. No. 25-490 (kmw)
: 18 U.S.C. § 2423(a)
: 18 U.S.C. § 2423(b)
: 18 U.S.C. § 2422(b)
: 18 U.S.C. § 2251(a)
: 18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Trenton, charges as follows:

**Count One
(Transportation of a Minor for Unlawful Sexual Activity)**

On or about July 13, 2024, in Atlantic County, in the District of New Jersey, the Eastern District of Pennsylvania, and elsewhere, the defendant,

BOBBYJEAN ORAK,

did knowingly transport Victim-1, an individual who had not attained the age of 18 years, in interstate and foreign commerce, with intent that the individual engage in sexual activity for which any person can be charged with a criminal offense, namely, committing an act of sexual penetration with another person where the victim is at least 13 but less than 16 years old and the actor is at least four years older than the victim, which was a criminal offense under N.J.S.A. 2C:14-2(c)(4).

In violation of Title 18, United States Code, Section 2423(a).

Count Two
**(Interstate Travel with Intent to Engage in a Sexual Act with/a
Minor)**

On or about July 13, 2024, in Atlantic County, in the District of
New Jersey, and elsewhere, the defendant,

BOBBYJEAN ORAK,

did knowingly travel in interstate commerce for the purpose of engaging in any
illicit sexual conduct with another person, as defined in Title 18, United States
Code, Section 2423(g).

In violation of Title 18, United States Code, Section 2423(b).

Count Three
(Enticement)

From in or around October 2022 through on or about August 13, 2024, in Atlantic County, in the District of New Jersey, and elsewhere, the defendant,

BOBBYJEAN ORAK,

did use the mail and any facility and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce Victim-1, an individual who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, namely, sexual assault of a victim at least 13 but less than 16 years old, which was a criminal offense under N.J.S.A. 2C:14-2(a)(2).

In violation of Title 18, United States Code, Section 2422(b).

Count Four
(Production of Child Pornography)

From on or about March 7, 2024 through on or about August 13, 2024, in Atlantic County, in the District of New Jersey, and elsewhere, the defendant,

BOBBYJEAN ORAK,

did knowingly employ, use, persuade, induce, entice, and coerce any minor, namely, Victim-1, to engage in any sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction actually was transported and transmitted using any means and facility of interstate and foreign commerce and was in and affecting interstate and foreign commerce and mailed.

In violation of Title 18, United States Code, Section 2251(a).

Count Five
(Possession of Child Pornography)

On or about August 13, 2024, in Atlantic County, in the District of New Jersey, and elsewhere, the defendant,

BOBBYJEAN ORAK,

did knowingly possess and knowingly access with intent to view, any book, magazine, periodical, film, videotape, computer disk, and any other material that contained images and videos of child pornography as defined in Title 18, United States Code, Section 2256(8)(A), involving a prepubescent minor and a minor who had not attained 12 years of age, that had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that 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 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION ONE

As a result of committing any of the offenses alleged in Counts One, Two, and Three of this Indictment, the defendant,

BOBBYJEAN ORAK,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2248, all of defendant ORAK's right, title, and interest in the following:

- a. Any property, real or personal, used or intended to be used to commit or to facilitate the commission of any violation of this chapter.
- b. Any property, real or personal, that constitutes or is derived from proceeds traceable to any violation of this chapter.

The property to be forfeited includes, but is not limited to, all of ORAK's right, title, and interest in an iPhone SE bearing Serial No. NWV2HL0Q54.

FORFEITURE ALLEGATION TWO

As a result of committing either of the offenses alleged in Counts Four and Five of this Indictment, the defendant,

BOBBYJEAN ORAK,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, all of defendant ORAK's right, title, and interest in the following:

- a. any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260, 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 Title 18, United States Code, Part I, Chapter 110;
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in Counts Four and Five of this Indictment, and all property traceable to such property; and
- c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses, and all property traceable to such property.

The property to be forfeited includes, but is not limited to, all of ORAK's right, title, and interest in an iPhone SE bearing Serial No. NWV2HLOQ54.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Counts)

If any of the forfeitable 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,

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 and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL


FOREPERSON


ALINA HABBA
Acting United States Attorney

CASE NUMBER: 25-_____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

BOBBYJEAN ORAK

INDICTMENT FOR

18 U.S.C. § 2423(a)

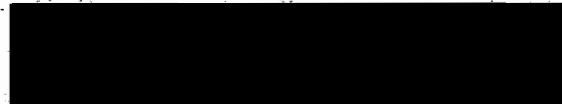
18 U.S.C. § 2423(b)

18 U.S.C. § 2422(b)

18 U.S.C. § 2251(a)

18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)

A True Bill,



Foreperson

**ALINA HABBA
ACTING UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY**

**MATTHEW J. BELGIOVINE
ASSISTANT U.S. ATTORNEY
TRENTON, NEW JERSEY
973.856.9179**
