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

UNITED STATES OF AMERICA : Hon. Christine P. O'Hearn
:
v. : Crim. No. 25-573
:
GABRIEL PEREZ : 18 U.S.C. § 2422(b)
: 18 U.S.C. § 1470

**SUPERSEDING
INDICTMENT**

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

**Count One
(Attempted Enticement and Coercion of a Minor)**

From on or about August 13, 2024 through on or about August 29, 2024,
in Burlington County, in the District of New Jersey, and elsewhere, the
defendant,

GABRIEL PEREZ,

did use any facility and means of interstate commerce to knowingly attempt to
persuade, induce, entice, and coerce 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(c)(4).

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

Count Two
(Attempted Transfer of Obscene Material to a Minor)

On or about August 28, 2024, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

GABRIEL PEREZ,

did, by means of interstate commerce, knowingly attempt to transfer obscene matter to another individual who had not attained the age of 16 years, knowing that the other individual had not attained the age of 16 years.

In violation of Title 18, United States Code, Section 1470.

FORFEITURE ALLEGATION ONE

As a result of committing the offense alleged in Count One of this Superseding Indictment, the defendant,

GABRIEL PEREZ,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2248, all of defendant PEREZ'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 Title 18, United States Code, Part I, Chapter 117.
- b. Any property, real or personal, that constitutes or is derived from proceeds traceable to any violation of Title 18, United States Code, Part I, Chapter 117.

FORFEITURE ALLEGATION TWO

As a result of committing the offense alleged in Count Two of this Superseding Indictment, the defendant,

GABRIEL PEREZ,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1467, all of defendant PEREZ's right, title, and interest in the following:

- a. any obscene material produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Part I, Chapter 71;
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in Count Two of this Superseding Indictment; and
- c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

A TRUE BILL


FOREPERSON

ROBERT FRAZER
United States Attorney


Matthew J. Belgiovine
Richard G. Shephard
Assistant United States Attorneys

Approved:

R. David Walk, Jr.
Deputy United States Attorney

CASE NUMBER: 25-573 (CPO)

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

GABRIEL PEREZ

SUPERSEDING INDICTMENT
FOR

18 U.S.C. § 2422(b)
18 U.S.C. § 1470

A True Bill,


Foreperson

ROBERT FRAZER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY

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RICHARD G. SHEPHARD
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