

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Freda L. Wolfson  
 :  
 v. : Crim. No. 19-  
 :  
 RICHARD ORTIZ : 18 U.S.C. § 1594(c)  
 :

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges that:

From in or around January 2018, through on or about February 2, 2018, in Middlesex, Bergen, and Essex Counties, in the District of New Jersey and elsewhere, the defendant,

RICHARD ORTIZ,

did knowingly and intentionally conspire and agree with another, to knowingly, in and affecting interstate commerce, and after having had a reasonable opportunity to observe Victim-1, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means, Victim-1, knowing, and in reckless disregard of the fact, that Victim-1 had not attained the age of 18 years and that Victim-1 would be caused to engage in one or more commercial sex acts, contrary to Title 18, United States Code, Section 1591(a)(1), (b)(2) and (c).

In violation of Title 18, United States Code, Section 1594(c).

FORFEITURE ALLEGATION

As a result of committing the offense charged in this Information, the defendant,

RICHARD ORTIZ,

shall forfeit to the United States of America, pursuant to 18 U.S.C. §§ 1593 and 1594(d), any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the said offense, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged in this Information.

Substitute Assets Provision

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,

it is the intent of the United States, pursuant to 18 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

  
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CRAIG CARPENITO  
United States Attorney

**CASE NUMBER:** \_\_\_\_\_

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

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**UNITED STATES OF AMERICA**

**v.**

**RICHARD ORTIZ**

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**INFORMATION FOR**

18 U.S.C. § 1594(c)

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**CRAIG CARPENITO**

*UNITED STATES ATTORNEY*

*NEWARK, NEW JERSEY*

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SHAWN P. BARNES

*SPECIAL ASSISTANT U.S. ATTORNEY*

*NEWARK, NEW JERSEY*

*973-645-2700*

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