

IN THE UNITED STATES DISTRICT COURT DEC 03 2024

FOR THE DISTRICT OF NEW MEXICO MITCHELL R. ELPERS
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

VICTOR BARNETT LANE,

Defendant.

CRIMINAL NO. 24-1722 KWRCount 1: 18 U.S.C. § 2422(b): Coercion
and Enticement of a Minor;Count 2: 18 U.S.C. §§ 2423(b) and (g):
Interstate Travel with Intent to Engage in
Illicit Sexual Conduct with a Minor;Count 3: 18 U.S.C. §§ 2251(a), 2251(e),
and 2256: Production of a Visual
Depiction of a Minor Engaging in
Sexually Explicit Conduct.INDICTMENT

The Grand Jury charges:

Count 1

From on or about November 1, 2022, and continuing to on or about May 5, 2024, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendant, **VICTOR BARNETT LANE**, using any facility of interstate and foreign commerce, knowingly persuaded, induced, enticed, and coerced any individual who had not attained the age of 18 years, to engage in any sexual activity for which any person could be charged with a criminal offense.

In violation of 18 U.S.C. § 2422(b).

Count 2

From on or about December 13, 2023, and continuing to on or about December 17, 2023, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendant, **VICTOR**

BARNETT LANE, traveled in interstate and foreign commerce from South Korea to the District of New Mexico, for the purpose of engaging in illicit sexual conduct, with Jane Doe, who had not attained the age of 18.

In violation of 18 U.S.C. §§ 2423(b) and (g).

Count 3

From on or about December 13, 2023, and continuing to on or about December 17, 2023, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendant, **VICTOR BARNETT LANE**, employed, used, persuaded, induced, enticed and coerced a minor under 18 years of age, Jane Doe, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, 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 18 U.S.C. §§ 2251(a), 2251(e), and 2256.

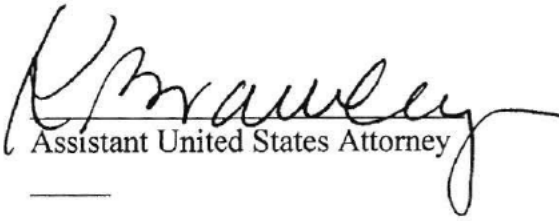
FORFEITURE ALLEGATIONS

Upon conviction of any offense in violation of 18 U.S.C. § 2422 or 18 U.S.C. § 2423, the defendant, **VICTOR BARNETT LANE**, shall forfeit to the United States, pursuant to 18 U.S.C. § 2428: any property, real or personal, used or intended to be used to commit or to facilitate the commission of such violation; and any property, real or personal, constituting or derived from any proceeds the defendant obtained, directly or indirectly, as a result of such violation, including, but not limited to an Apple iPhone 14 bearing IMEI number 359922416539320.

Upon conviction of any offense in violation of 18 U.S.C. § 2251, the defendant, **VICTOR BARNETT LANE**, shall forfeit to the United States, pursuant to 18 U.S.C. § 2253: any matter containing visual depictions produced, transported, mailed, shipped, or received in violation of Chapter 110, of United States Code Title 18; 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 such offense or any property traceable to such property. The property to be forfeited includes, but is not limited to an Apple iPhone 14 bearing IMEI number 359922416539320.

A TRUE BILL:


Assistant United States Attorney

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FOREPERSON OF THE GRAND JURY