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★ MAR 12 2025 ★

LONG ISLAND OFFICE

MRM:PGS  
F. #2025R00104

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
-----X

UNITED STATES OF AMERICA

- against -

DAVID IBARRA,

Defendant.

-----X

THE GRAND JURY CHARGES:

INDICTMENT

CR 25 90

C. No. (T. 18, U.S.C., §§ 2251(a), 2251(e),  
2253(a), 2253(b), 2422(b), 2428(a) and  
3551 et seq.; T. 21, U.S.C., § 853(p))

SEYBERT, J.

LOCKE, M. J.

COUNT ONE  
(Sexual Exploitation of a Child)

1. In or about August 2024, within the Eastern District of New York and elsewhere, the defendant DAVID IBARRA did employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct, and knowingly and intentionally attempt to do so, for the purpose of producing one or more visual depictions of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and which would be in and affecting interstate and foreign commerce, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depictions were actually transported and transmitted using a means

and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT TWO  
(Coercion and Enticement)

2. In or about August 2024, within the Eastern District of New York and elsewhere, the defendant DAVID IBARRA, using one or more facilities and means of interstate and foreign commerce, to wit: the Internet and mobile Internet applications, did knowingly and intentionally persuade, induce, entice and coerce an individual who had not attained the age of 18 years, to wit: Jane Doe, to engage in sexual activity for which a person could be charged with a criminal offense, to wit: the offense charged in Count One.

(Title 18, United States Code, Sections 2422(b) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT ONE

3. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253(a), which requires the forfeiture of (a) any visual depiction described in Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Title 18 of the United States Code, 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 such sections; (b) any property, real or personal, constituting, or traceable to, gross profits or other proceeds obtained from such offenses; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such

offenses or any property traceable to such property, including but not limited to the following property seized from the defendant on February 12, 2025, in Anchorage, Alaska:

- (a) one Apple iPhone 16 Pro, serial number LL9D00D6QT; and
- (b) one Seagate Portable hard drive, serial number NAAZW5K7.

4. If any of the above-described forfeitable property, 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(b), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 2253(a) and 2253(b); Title 21, United States Code, Section 853(p))

**CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT TWO**

5. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2428(a), which requires the forfeiture of (i) any property, real or personal, that was used or intended to be used to commit or to facilitate

the commission of such offense; and (ii) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense, including but not limited to the following property seized from the defendant on February 12, 2025, in Anchorage, Alaska:

- (a) one Apple iPhone 16 Pro, serial number LL9D00D6QT; and
- (b) one Seagate Portable hard drive, serial number NAAZW5K7.

6. If any of the above-described forfeitable property, 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), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2428(a); Title 21, United States Code, Section 853(p))

A TRUE BILL  
/s/

FOR PERSON

*By David Pittluck, Assistant U.S. Attorney*

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JOHN J. DURHAM  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK