

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS
AUG 01 2023
By: TAMMY H. DOWNS CLERK
DEP CLERK

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

UNITED STATES OF AMERICA)
) 4:23CR 00209 LPR
v.)
) 18 U.S.C. §§ 2423(a) and (e)
HEATHER HARE) 18 U.S.C. § 2422(a)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

In or about August 2021 to on or about April 24, 2022, in the Eastern District of Arkansas and elsewhere, the defendant,

HEATHER HARE,

knowingly persuaded, induced, enticed and coerced any individual, namely J.R., to travel in interstate commerce to engage in any sexual activity for which a person can be charged with a criminal offense, namely a criminal offense under Arkansas law, Sexual Assault in the Second Degree, in violation of A.C.A. § 5-14-125.

All in violation of Title 18, United States Code, Section 2422(a).

COUNT 2

On or about April 21, 2022, to on or about April 24, 2022, in the Eastern District of Arkansas and elsewhere, the defendant,

HEATHER HARE,

knowingly transported, and attempted to transport, J.R., an individual who had not attained the age of 18 years, in interstate commerce, from Arkansas to Washington D.C., with the intent that J.R. engage in any sexual activity for which a person can be charged with a criminal offense,

namely a criminal offense under Arkansas law, Sexual Assault in the Second Degree, in violation of A.C.A. § 5-14-125.

All in violation of Title 18, United States Code, Sections 2423(a) and (e).

(END OF TEXT. SIGNATURE PAGE ATTACHED.)