UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA ORLANDO DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 6:24-cr- 3 - ORI- PGB- RMW 18 U.S.C. § 2251(a)

MARIE-JO GORDO

INDICTMENT

The Grand Jury charges:

COUNT ONE

On or about June 17, 2023, in the Middle District of Florida, the defendant, MARIE-JO GORDO,

did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced and transmitted using materials that had been transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of 18 U.S.C. § 2251(a) and (e).

COUNT TWO

On or about June 26, 2023, in the Middle District of Florida, the defendant, MARIE-JO GORDO,

did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced and transmitted using materials that had been

transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of 18 U.S.C. § 2251(a) and (e).

COUNT THREE

On or about July 8, 2023, in the Middle District of Florida, the defendant, MARIE-JO GORDO,

did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced and transmitted using materials that had been transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of 18 U.S.C. § 2251(a) and (e).

FORFEITURE

- 1. The allegations contained in Counts One, Two, and Three are incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 2253.
- 2. Upon conviction of a violation of 18 U.S.C. § 2251(a), the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 2253:
- a. Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B, or 2260 of chapter 110 of Title 18, 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 chapter 110;

- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- c. 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.
- 3. The property to be forfeited includes, but is not limited to, the following: one Apple iPhone 11 that was seized from MARIE-JO GORDO on October 27, 2023.
- 4. 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 person;
 - 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 subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).

A TRUE BILL,

ROGER B. HANDBERG United States Attorney

By:

Adam J. Nate

Assistant United States Attorney

By:

Chauncey A. Bratt

Assistant United States Attorney Deputy Chief, Orlando Division No.

UNITED STATES DISTRICT COURT Middle District of Florida Orlando Division
THE UNITED STATES OF AMERICA
VS.
MARIE-JO GORDO
INDICTMENT
Violation:
18 U.S.C. § 2251(a)
A true bill,
Filed in open court this 3 rd day of January, 2024. Clerk Clerk
Bail \$