

**SEALED**  
**BY ORDER OF THE COURT**

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

MAY 26 2022

at 1 o'clock and 38 min. M  
CLERK, U.S. District Court

CLARE E. CONNORS #7936  
United States Attorney  
District of Hawaii

WAYNE A. MYERS  
CHRISTINE OLSON  
Assistant U.S. Attorneys  
Room 6-100, PJKK Federal Building  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96850  
Telephone: (808) 541-2850  
Facsimile: (808) 541-2958  
Email: Wayne.Myers@usdoj.gov  
Christine.Olson2@usdoj.gov

**FILED**  
United States District Court  
Albuquerque, New Mexico  
Mitchell R. Elfers  
Clerk of Court

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

22-MJ-921

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MASON JORDAN,

Defendant.

CR. NO.

**CR 22-00046 LEK**

**FILED UNDER SEAL**

INDICTMENT

[18 U.S.C. §§ 2251(a), 2251(e),  
2422(b), 1591(a)(1), 1591(b)(2),  
1592(c), 1594(a), and 2261A(2)(B)]

INDICTMENT

The Grand Jury charges:

Count 1  
Sexual Exploitation of a Child  
(18 U.S.C. §§ 2251(a) and (e))

On or about July 17, 2017, within the District of Hawaii, MASON JORDAN, the defendant, did attempt to and did employ and use a minor, Minor Victim 1, to engage in sexually explicit conduct for the purpose of producing visual depictions 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 in and affecting such commerce, and where the visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and where such visual depictions were actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting such commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

Count 2  
Sexual Exploitation of a Child  
(18 U.S.C. §§ 2251(a) and (e))

On or about July 2, 2016, within the District of Hawaii, MASON JORDAN,



the defendant, did attempt to and did employ and use a minor, Minor Victim 1, to engage in sexually explicit conduct for the purpose of producing visual depictions 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 in and affecting such commerce, and where the 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.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

Count 3  
Sexual Exploitation of a Child  
(18 U.S.C. §§ 2251(a) and (e))

On or about July 18, 2016, within the District of Hawaii, MASON JORDAN, the defendant, did attempt to and did employ and use a minor, Minor Victim 1, to engage in sexually explicit conduct for the purpose of producing visual depictions 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 in and affecting such commerce, and where the 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.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

Count 4  
Coercion and Enticement  
(18 U.S.C. § 2422(b))

On or about January 14, 2020, within the District of Hawaii, MASON JORDAN, the defendant, did use any facility and means of interstate and foreign commerce, that is, the Internet and a cellular phone, to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, Minor Victim 2, to engage in prostitution, and attempted to do so.

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

Count 5  
Coercion and Enticement  
(18 U.S.C. § 2422(b))

On or about January 22, 2020, within the District of Hawaii, MASON JORDAN, the defendant, did use any facility and means of interstate and foreign commerce, that is, the Internet and a cellular phone, to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, Minor Victim 3, to engage in prostitution, and attempted to do so.



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

Count 6  
Sex Trafficking of a Child  
(18 U.S.C. §§ 1591(a)(1) and 1594(a))

On or about January 14, 2020, within the District of Hawaii, MASON JORDAN, the defendant, in and affecting interstate and foreign commerce, did knowingly recruit, entice, transport, obtain, patronize, and solicit, by any means, a person, Minor Victim 2, who had attained the age of 14 years but had not attained the age of 18 years, knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe Minor Victim 2, that Minor Victim 2 had not attained the age of 18 years and would be caused to engage in a commercial sex act, and attempted to do so.

All in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1592(c), and 1594(a).

Count 7  
Sex Trafficking of a Child  
(18 U.S.C. §§ 1591(a)(1) and 1594(a))

On or about January 22, 2020, within the District of Hawaii, MASON JORDAN, the defendant, in and affecting interstate and foreign commerce, did knowingly recruit, entice, transport, obtain, patronize, and solicit, by any means, a person, Minor Victim 3, who had attained the age of 14 years but had not attained

the age of 18 years, knowing and in reckless disregard of the fact, and having had a reasonable opportunity to observe Minor Victim 3, that Minor Victim 3 had not attained the age of 18 years and would be caused to engage in a commercial sex act, and attempted to do so.

All in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), 1592(c), and 1594(a).

Count 8  
Cyberstalking  
(18 U.S.C. § 2261A(2)(B))

Between on or about April 10, 2020 and April 11, 2020, both dates being approximate and inclusive, within the District of Hawaii, MASON JORDAN, the defendant, with the intent to harass and cause substantial emotional distress to another person, Adult Female 1, did use facilities of interstate and foreign commerce, including the Internet and a cellular phone, to engage in a course of conduct that caused, and would be reasonably expected to cause, substantial emotional distress to Adult Female 1, and attempted to do so.

All in violation of Title 18, United States Code, Section 2261A(2)(B).



First Forfeiture Notice

1. The allegations in Counts 1 to 3 of this Indictment are incorporated here for the purpose of noticing forfeitures pursuant to Title 18, United States Code, Section 2253.

2. The United States hereby gives notice to MASON JORDAN, the defendant, that, upon conviction of an offense in violation of Title 18, United States Code, Section 2251, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 2253, of (a) any visual depiction described in Title 18, United States Code, Section 2252, and 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 that section; (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. If by any act or omission of the defendant, any of the property subject to forfeiture described in paragraph 2 of this section:

- 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 subdivided without difficulty,

the United States will be entitled to forfeiture of substitute property up to the value of the property described in paragraph 2 of this section, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253.

#### Second Forfeiture Notice

1. The allegations in Counts 4 to 5 of this Indictment are incorporated here for the purpose of noticing forfeitures pursuant to Title 18, United States Code, Section 2428.

2. The United States hereby gives notice to MASON JORDAN, the defendant, that, upon conviction of an offense in violation of Title 18, United States Code, Section 2422, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 2428, of (a) the defendant's interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and (b) any property, real or personal, constituting or



derived from any proceeds that the defendant obtained, directly or indirectly, as a result of such violation.

3. If by any act or omission of the defendant, any of the property subject to forfeiture described in paragraph 2 of this section:

- 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 subdivided without difficulty,

the United States will be entitled to forfeiture of substitute property up to the value of the property described in paragraph 2 of this section, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461.

#### Third Forfeiture Notice

1. The allegations in Counts 6 to 7 of this Indictment are incorporated here for the purpose of noticing forfeitures pursuant to Title 18, United States Code, Section 1594.

2. The United States hereby gives notice to MASON JORDAN, the defendant, that, upon conviction of an offense in violation of Title 18, United States Code, Section 1591, the United States will seek forfeiture, in accordance with Title 18, United States Code, Section 1594, of (a) the defendant's interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and (b) any property, real or personal, constituting or derived from any proceeds that the defendant obtained, directly or indirectly, as a result of such violation.

3. If by any act or omission of the defendant, any of the property subject to forfeiture described in paragraph 2 of this section:

- 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 subdivided without difficulty,

the United States will be entitled to forfeiture of substitute property up to the value of the property described in paragraph 2 of this section, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United

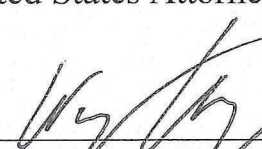


States Code, Section 2461.

DATED: May 26, 2022, at Honolulu, Hawaii.

A TRUE BILL

/s/ Foreperson  
FOREPERSON, GRAND JURY

  
\_\_\_\_\_  
CLARE E. CONNORS #7936  
United States Attorney  
\_\_\_\_\_  
WAYNE A. MYERS  
CHRISTINE OLSON  
Assistant U.S. Attorneys

United States v. Mason Jordan  
Indictment

Cr. No. **C'R 22 - 00046** **LEK**

## UNITED STATES DISTRICT COURT

District of Hawaii

UNITED STATES OF AMERICA

WARRANT FOR ARREST

V.

Case Number: CR 22-00046 LEK

MASON JORDAN

(Name and Address of Defendant)

To: The United States Marshal and any Authorized United States Officer

YOU ARE HEREBY COMMANDED TO ARREST MASON JORDAN and bring him or her forthwith to the nearest district/ magistrate judge to answer an Indictment , charging him or her with (brief description of offense)

Counts 1-3: Sexual Exploitation of a Child

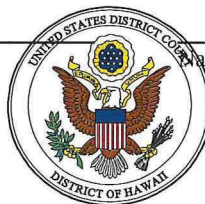
Counts 4 &amp; 5: Coercion and Enticement

Counts 6 &amp; 7: Sex Trafficking of a Child

Count 8: Cyberstalking

• in violation of Title 18 United States Code, Section(s) 2251(a) and 2251(e), 18 U.S.C. §§ 2422(b), 18 U.S.C. §§ 1591(a)(1), 1591(b)(2), 1592(c), 1594(a), 18 U.S.C. §§ 2261A(2)(B)

Date: May 26, 2022

Pam Hartman Beyer, Clerk of Court  
Name and Title of Issuing Officer

Location: Honolulu, Hawaii

/S/Pam Hartman Beyer by deputy clerk EA  
Prepared/Signed By:

By: Wes Reber Porter, United States Magistrate Judge

## RETURN

This warrant was received and executed with the arrest of the above-named defendant at

Date Received	NAME AND TITLE OF ARRESTING OFFICER	SIGNATURE OF ARRESTING OFFICER
Date of Arrest		