

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
 :
 v. : **DATE FILED:** _____
 :
 : **VIOLATIONS:**
 ALEXANDER DAVIS :
 : **18 U.S.C. § 2422(b) (use of an interstate**
 : **facility to entice a minor to engage in**
 : **sexual conduct- 1 count)**
 : **18 U.S.C. § 2423(b) (travel in interstate**
 : **commerce with intent to engage in illicit**
 : **sexual conduct- 1 count)**
 : **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

Between on or about December 4, 2017 and December 20, 2017, in Northampton County, in the Eastern District of Pennsylvania, and elsewhere, the defendant

ALEXANDER DAVIS

used a facility and means of interstate and foreign commerce, that is, an Apple iPhone cellular phone, to attempt to persuade, induce, entice and coerce a minor, who he believed had not attained the age of 18 years, to engage in sexual activity, for which any person could be charged with a criminal offense, that is, 18 Pa. C.S.A. § 3122.1 and § 902, solicitation to commit statutory sexual assault, and 18 Pa. C.S.A. § 6318(a)(1), unlawful contact with a minor.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 20, 2017, in Northampton County, in the Eastern District of Pennsylvania, and elsewhere, defendant

ALEXANDER DAVIS

traveled, and attempted to travel, from Monsey, New York to Bethlehem, Pennsylvania for the purpose of engaging in illicit sexual conduct with another person, namely, a sexual act (as defined in Title 18, United States Code, Section 2246) with a person under 18 years of age that would be in violation of Chapter 109A of Title 18, United States Code, had the sexual act occurred in the special maritime and territorial jurisdiction of the United States.

In violation of Title 18, United States Code, Section 2423(b), (e).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 2422(b) and 2423(b) as set forth in this indictment, defendant

ALEXANDER DAVIS

shall forfeit to the United States of America:


(a) any property, real or personal, used or intended to be used to commit or to facilitate the commission of such violation including, but not limited to, items seized from the person of ALEXANDER DAVIS as follows:

- i. Apple iPhone Cellular Phone, Model Number A1723, Serial Number 358634076511470

All pursuant to Title 18, United States Code, Section 2428.

A TRUE BILL:

GRAND JURY FOREPERSON


LOUIS D. LAPPEN
United States Attorney