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APR 30 2024			
CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA			
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE DISTRICT OF ARIZONA

10 United States of America,
11
12 Plaintiff,
13
14 vs.
15 Alaa Robert Bartley,
16
17 Defendant.

No. CR-24-00749-PHX-JJT (DMF)

REDACTED INDICTMENT

VIO: 18 U.S.C. §§ 2251(a), 2251(e) and
2256
(Attempted Production of Child
Pornography)
Count 1

18 U.S.C. § 2422(b)
(Attempted Coercion and
Enticement of a Minor)
Count 2

18 U.S.C. §§ 2252(a)(2),
2252(b)(1) and 2256
(Knowingly Distributing Child
Pornography)
Count 3

18 U.S.C. §§ 2252(a)(2),
2252(b)(1) and 2256
(Knowingly Receiving Child
Pornography)
Counts 4-11

18 U.S.C. §§ 2252(a)(4)(B),
2252(b)(2) and 2256
(Possession of Child
Pornography)
Count 12

18 U.S.C. §§ 981 and 2253,
21 U.S.C. § 853 and
28 U.S.C. § 2461(c)
(Forfeiture Allegations)

1 **THE GRAND JURY CHARGES:**

2 **COUNT 1**

3 On or about November 25, 2019, in the District of Arizona and elsewhere,
4 Defendant ALAA ROBERT BARTLEY did knowingly use a minor, that is, Jane Doe, age
5 15, to engage in sexually explicit conduct for the purpose of producing any visual depiction
6 of such conduct knowing and having reason to know that the visual depiction would be
7 transported and transmitted using any means and facility of interstate and foreign
8 commerce, and in and affecting commerce and mailed if the visual depiction was produced
9 and transmitted using materials that have been mailed, shipped, and transported in and
10 affecting interstate and foreign commerce by any means, including by computer, and such
11 visual depiction was actually transported and transmitted using any means and facility of
12 interstate and foreign commerce and in and affecting interstate and foreign commerce and
13 mailed, and did attempt to do so, to wit: a visual file created on or about 11/25/19 2:41:30
14 PM UTC -7 in a bathroom.

15 All in violation of Title 18, United States Code, Sections 2251(a), 2251(e) and 2256.

16 **COUNT 2**

17 On or between approximately December 18, 2023, through April 4, 2024, in the
18 District of Arizona and elsewhere, Defendant ALAA ROBERT BARTLEY did unlawfully
19 and knowingly use any facility and means of interstate and foreign commerce to attempt
20 to persuade, induce, entice, and coerce any individual who had not attained the age of 18
21 years, to engage in any sexual activity for which any person can be charged with a criminal
22 offense, including Ariz. Rev. Stat. § 13-1405 (Sexual Conduct with a Minor).

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

24 **COUNT 3**

25 On or about August 23, 2023, in the District of Arizona, and elsewhere, Defendant
26 ALAA ROBERT BARTLEY knowingly distributed a visual depiction that involved the
27 use of a minor engaging in sexually explicit conduct and such visual depictions were of
28 such conduct. Defendant ALAA ROBERT BARTLEY distributed the visual depiction

1 within a social media platform. The visual depiction was mailed, shipped, and transported
 2 using any means or facility of interstate or foreign commerce and in and affecting interstate
 3 and foreign commerce, and had been produced using materials which had been mailed,
 4 shipped, and transported by any means, including by computer. Some of the files that were
 5 distributed by Defendant ALAA ROBERT BARTLEY can be identified as:

6 File 1 sent on or about 8/23/2023 8:05:18 AM

7 File 2 sent on or about 8/23/2023 8:05:42 AM

8 File 3 sent on or about 8/23/2023 8:06:59 AM

9 File 4 sent on or about 8/23/2023 8:09:53 AM

10 File 5 sent on or about 8/23/2023 8:12:40 AM

11 File 6 sent on or about 8/23/2023 8:21:31 AM

12 All in violation of Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1)
 13 and 2256.

14 **COUNTS 4 - 11**

15 On or about the dates below, in the District of Arizona, and elsewhere, Defendant
 16 ALAA ROBERT BARTLEY knowingly received a visual depiction that involved the use
 17 of a minor engaging in sexually explicit conduct and such visual depictions were of such
 18 conduct. Defendant ALAA ROBERT BARTLEY received the visual depiction within a
 19 social media platform. The visual depiction was mailed, shipped, and transported using
 20 any means or facility of interstate or foreign commerce and in and affecting interstate and
 21 foreign commerce, and had been produced using materials which had been mailed, shipped,
 22 and transported by any means, including by computer. Some of the files that were received
 23 by Defendant ALAA ROBERT BARTLEY can be identified as:

Count	Date (on or about)	File(s)
4	December 19, 2020	VID-20201219-WA0008.mp4 IMG-20201219-WA0011.jpg
5	December 27, 2020	VID-20201227-WA0002.mp4

6	December 31, 2020	VID-20201219-WA0008(2).mp4
7	January 6, 2021	VID-20201219-WA0008(3).mp4
8	January 24, 2021	IMG-20210124-WA0006.jpg IMG-20210124-WA0009.jpg
9	April 10, 2021	IMG-20210410-WA0027.jpg VID-20210410-WA0035.mp4
10	June 30, 2021	IMG-20210630-WA0000.jpg
11	October 4, 2021	VID-20211004-WA0035.mp4

All in violation of Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1) and 2256.

COUNT 12

On or about April 4, 2024, in the District of Arizona and elsewhere, Defendant ALAA ROBERT BARTLEY knowingly possessed and knowingly accessed with intent to view, visual depictions that involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct. The visual depictions possessed and accessed by Defendant ALAA ROBERT BARTLEY were contained on a cell phone and included a prepubescent minor and a minor under the age of 12. The visual depictions on the cell phone had been mailed, shipped, or transported using any means or facility of interstate or foreign commerce or in and affecting interstate or foreign commerce, and had been produced using materials which had been mailed, shipped, or transported, by any means, including by computer. Some of the visual depictions of minors engaged in sexually explicit conduct are listed below:

Item	File Name
Cellular phone identified as QPX1	Tumblr_1_372754927935459.jpg
	Tumblr_1_904698625169828.jpg
	dfa41082-780d-417c-9a15-be950f232add.jpg
Cellular phone identified as QPX7	The Uranus girl – ass fuck 2 + cum.mp4

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1.avi
1_4983531273164161098.mp4
1_5012619239824032522.mp4
eo-159.mp4
VID_20230423_132312_309.mp4
VID_2030408_102157_396.mp4
VID_20221001_165746_070.mp4
IMG_2610.mp4
IMG_2562.mp4
VID_20220718_023834_553.mp4
febfeb002.webm
febfeb007.webm
trim.28908E2E-B884-440C-B6B5-35C9D2145ED7.mov
trim.16561A9A-5BFD-4170-B094-E5CE01969DEA.mov
ea2bfcf3-5a61-472c-9d20-4491440232b5.mp4
VID_20200926_033516_752.mp4

In violation of Title 18, United States Code, Section 2252(a)(4)(B), 2252(b)(2) and 2256.

FORFEITURE ALLEGATIONS

The Grand Jury realleges and incorporates the allegations of Counts 1-12 of this Indictment, which are incorporated by reference as though fully set forth herein.

Pursuant to Title 18, United States Code, Sections 981, and 2253, Title 21 United States Code, Section 853, and Title 28, United States Code, Section 2461(c), and upon conviction of one or more of the offenses alleged in Counts 1-12 of this Indictment, the defendant shall forfeit to the United States of America all right, title, and interest in any visual depiction, 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 statute, and any property, real or personal, constituting or traceable

1 to gross profits or other proceeds obtained from such offense, and any property, real or
2 personal, used or intended to be used to commit or to promote the commission of such
3 offenses or any property traceable to such property, including by not limited to, the two
4 cellular telephones seized by law enforcement on April 4, 2024.

5 If any forfeitable property, as a result of any act or omission of the defendant:

- 6 (1) cannot be located upon the exercise of due diligence,
7 (2) has been transferred or sold to, or deposited with, a third party,
8 (3) has been placed beyond the jurisdiction of the court,
9 (4) has been substantially diminished in value, or
10 (5) has been commingled with other property which cannot be divided without
11 difficulty,

12 it is the intent of the United States to seek forfeiture of any other property of said defendant
13 up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. Section
14 853(p).

15 All in accordance with Title 18, United States Code, Sections 981 and 2253, Title
16 21, United States Code, Section 853, Title 28, United States Code, Section 2461(c), and Rule
17 32.2, Federal Rules of Criminal Procedure.

18 A TRUE BILL

19
20 s/
21 FOREPERSON OF THE GRAND JURY
Date: April 30, 2024

22 GARY M. RESTAINO
23 United States Attorney
District of Arizona

24
25 s/
26 GAYLE L. HELART
Assistant United States Attorney