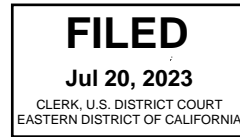


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6 Attorneys for Plaintiff  
7 United States of America

8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 BRADLEY EARL REGER,  
15 Defendant.

CASE NO. 2:23-cr-0177 TLN  
18 U.S.C. § 2423(c) – Engaging in Illicit Sexual  
Conduct in a Foreign Place (2 counts); 18 U.S.C.  
§ 2423(a) – Transportation with Intent to Engage in  
Criminal Sexual Activity; 18 U.S.C. § 2422(a) –  
Coercion and Enticement (2 counts); 18 U.S.C.  
§ 2428(b) - Criminal Forfeiture

16  
17 INDICTMENT

18  
19 COUNT ONE: [18 U.S.C. § 2423(c) – Engaging in Illicit Sexual Conduct in a Foreign Place]

20 The Grand Jury charges: T H A T

21 BRADLEY EARL REGER,

22 defendant herein, a United States citizen, who was arrested in the Eastern District of California, and  
23 whose last known address was in Lassen County in the Eastern District of California, between on or  
24 about October 31, 2009, and on or about November 7, 2009, traveled in foreign commerce from the  
25 Eastern District of California to the Republic of the Philippines, and did knowingly engage in illicit  
26 sexual conduct with Minor Victim #3, to wit: the intentional touching, not through the clothing, of  
27 Minor Victim #3’s genitalia, who had not attained the age of 16 years and who was at least four years  
28 younger than the defendant, with the intent to abuse, harass, degrade, and arouse and gratify the sexual

1 desire of any person, all in violation of 18 U.S.C. § 2423(c).

2 COUNT TWO: [18 U.S.C. § 2423(a) – Transportation with Intent to Engage in Criminal Sexual  
3 Activity]

4 The Grand Jury further charges: T H A T

5 BRADLEY EARL REGER,

6 between on or about June 13, 2010, and on or about July 3, 2010, did knowingly transport, and cause to  
7 be transported, Minor Victim #3, an individual who had not attained the age of 18 years, in interstate  
8 commerce between the Eastern District of California and the District of Nevada, and elsewhere, with  
9 intent that Minor Victim #3 engage in any sexual activity for which any person could be charged with a  
10 criminal offense, to wit, a violation of Nevada Revised Statute 201.230 (2005), and attempted to do so,  
11 all in violation of 18 U.S.C. § 2423(a) and (e).

12 COUNT THREE: [18 U.S.C. § 2422(a) – Coercion and Enticement]

13 The Grand Jury further charges T H A T

14 BRADLEY EARL REGER,

15 between on or about September 30, 2013, and in or about February 2014, in the County of Lassen, State  
16 and Eastern District of California, the District of Oregon, Canada and elsewhere, did knowingly  
17 persuade, induce, entice and coerce an individual, Minor Victim #2, who had not attained the age of 18  
18 years, to travel in interstate and foreign commerce to engage in any sexual activity for which any person  
19 can be charged with a criminal offense, and did attempt to do so, to wit: California Penal Code section  
20 288.4(a)(1), and California Penal Code section 243.4(c), all in violation of Title 18, United States Code,  
21 Section 2422(a).

22 COUNT FOUR: [18 U.S.C. § 2423(c) – Engaging in Illicit Sexual Conduct in a Foreign Place]

23 The Grand Jury charges: T H A T

24 BRADLEY EARL REGER,

25 a United States citizen, who was arrested in the Eastern District of California, and whose last known  
26 address was in Lassen County in the Eastern District of California, between on or about August 3, 2014,  
27 and on or about August 5, 2014, did travel in foreign commerce, from the Eastern District of California  
28 through other countries to the Republic of Poland, and did knowingly engage in illicit sexual conduct,

1 with Minor Victim #2, to wit: the intentional touching, not through the clothing, of Minor Victim #2's  
2 genitalia, who had not attained the age of 16 years and who was at least four years younger than the  
3 defendant, with the intent to abuse, harass, degrade, and arouse or gratify the sexual desire of any  
4 person, all in violation of 18 U.S.C. § 2423(c).

5 COUNT FIVE: [18 U.S.C. § 2422(a) – Coercion and Enticement]

6 The Grand Jury further charges T H A T

7 BRADLEY EARL REGER,

8 between on or about April 8, 2006, and on or about April 16, 2006, in the County of Lassen, State and  
9 Eastern District of California, the Eastern District of Virginia, and elsewhere, did knowingly persuade,  
10 induce, entice and coerce an individual, Minor Victim #1, who had not attained the age of 18 years, to  
11 travel in interstate and foreign commerce to engage in any sexual activity for which any person can be  
12 charged with a criminal offense, to wit: Virginia Statute § 18.2-370 (2005) and § 18.2-67.4:2 (March 30,  
13 2006), and did attempt to do so, all in violation of Title 18, United States Code, Section 2422(a).

14 FORFEITURE ALLEGATION: [18 U.S.C. § 2428(b) – Criminal Forfeiture]

15 1. Upon conviction of the offense alleged in Count Three of this Indictment, defendant  
16 BRADLEY EARL REGER shall forfeit to the United States pursuant to 18 U.S.C. § 2428(b), any  
17 property, real or personal, used or intended to be used to commit or to facilitate the commission of such  
18 violation, including but not limited to:

19 a. Real property located at 710 Ash Street, Susanville, California, Lassen County,  
20 APN: 105-030-23-11.

21 2. If any property subject to forfeiture as a result of the offense alleged in Count Three of  
22 this Indictment, for which defendant is convicted:

- 23 a. cannot be located upon the exercise of due diligence;  
24 b. has been transferred or sold to, or deposited with, a third party;  
25 c. has been placed beyond the jurisdiction of the Court;  
26 d. has been substantially diminished in value; or  
27 e. has been commingled with other property which cannot be  
28 divided without difficulty;

1 it is the intent of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to  
2 seek forfeiture of any other property of said defendant, up to the value of the property subject to  
3 forfeiture.

4  
5 A TRUE BILL.

6 **/s/ Signature on file w/AUSA**

7  
8 FOREPERSON

9 

10 PHILLIP A. TALBERT  
11 United States Attorney  
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No. 2:23-cr-0177 TLN

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**UNITED STATES DISTRICT COURT**

*Eastern District of California*

*Criminal Division*

**THE UNITED STATES OF AMERICA**

vs.

**BRADLEY EARL REGER**

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**I N D I C T M E N T**

**VIOLATION(S):** 18 U.S.C. § 2423(c) – Engaging in Illicit Sexual Conduct in a Foreign Place (2 counts);  
18 U.S.C. § 2423(a) – Transportation with Intent to Engage in Criminal Sexual Activity;  
18 U.S.C. § 2422(a) – Coercion and Enticement (2 counts);  
18 U.S.C. § 2428(b) - Criminal Forfeiture

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*A true bill,*

**/s/ Signature on file W/AUSA**

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*Foreman.*

Filed in open court this 20th day

of July, A.D. 2023

**/s/ Jonathan Anderson**

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*Clerk.*

**No process necessary**  
Bail, \$ -----

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*am Clavi*

**U.S. Magistrate Judge**

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**United States v. Bradley Earl Reger**  
**Penalties for Indictment**

**COUNT 1 and COUNT 4:**

VIOLATION: 18 U.S.C. § 2423(c) – Engaging in Illicit Sexual Conduct Abroad

PENALTIES: 30 years in prison;  
Fine of up to \$250,000;  
Supervised release of at least 5 years up to life  
Restitution: 18 U.S.C. § 3663

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

**COUNT 2:**

VIOLATION: 18 U.S.C. § 2423(a) – Transportation with Intent to Engage in Criminal Sexual Activity

PENALTIES: Up to life in prison, with a mandatory minimum 10 years in prison;  
Fine of up to \$250,000;  
Supervised release of at least 5 years up to life  
Restitution: 18 U.S.C. § 3663

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

**COUNT 3 and COUNT 5:**

VIOLATION: 18 U.S.C. § 2422(a) – Coercion and Enticement

PENALTIES: Up to 20 years in prison;  
Fine of up to \$250,000;  
Supervised release of at least 5 years up to life  
Restitution: 18 U.S.C. § 3663

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

**FORFEITURE ALLEGATION:**

VIOLATION: 18 U.S.C. § 2428(b) – Criminal Forfeiture

PENALTIES: As stated in the charging document