FILED

AUG 1 4 2017

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury
Number SGJ706-17-2

Superior Court

Docket Number 17 - 08 - 00 1 36 - \$

STATE	OF	NEW	JΙ	ERSEY)	
		V _a .)	
CHRISTOPHER WHITE)	

and

ADRIA REGN)

ORDER OF VENUE

An Indictment having been returned to this Court by the State Grand Jury in the above captioned matter,

IT IS ORDERED on this 14 day of 113/151, 2017, pursuant to paragraph 8 of the State Grand Jury Act, that the County of Burlington be and hereby is designated as the County of venue for the purpose of trial.

IT IS FURTHER ORDERED that the Clerk of the Superior Court shall transmit forthwith the Indictment in this matter and a certified copy of this Order to the Criminal Division Manager of the County of Burlington for filing.

Robert C. Billmeier, J.S.C.

FILED

AUG 1 4 2017

State Grand Jury Judge

SUPERIOR COURT OF NEW JERSEY LAW DIVISION - CRIMINAL

State Grand Jury
Number \$GJ706-17-2
Superior Court
Docket Number 17-08-00136-\$

STATE OF NEW	W JERSEY)	Against Co.
V.)	INDICTMENT
CHRISTOPHER	WHITE)	
and)	
ADRIA REGN)	

The Grand Jurors of and for the State of New Jersey, upon their oaths, present that:

COUNT ONE

(Conspiracy - First Degree)

CHRISTOPHER WHITE

and

ADRIA REGN

who are named as defendants herein, and other individuals whose identities are unknown to the Grand Jurors, who are named as co-conspirators but not as defendants herein, between on or about October 8, 2016, and on or about October 17, 2016, at the Township of Pemberton, and at the Borough of Wrightstown, both in the County of Burlington, elsewhere, and within the jurisdiction of this Court,

with the purpose of promoting or facilitating the commission of the crimes of human trafficking, facilitating human trafficking, promoting prostitution, manufacturing child pornography, distribution of child pornography, possession with intent to distribute child pornography, and endangering the welfare of children, did agree together that:

- A. One or more of them knowingly would engage in conduct which would constitute the aforesaid crimes, or
- B. One or more of them knowingly would aid in the planning, solicitation or commission of said crimes, that is:
- 1. Knowingly hold, recruit, lure, entice, harbor, transport, provide or obtain, by any means, a child under 18 years of age, to engage in sexual activity, contrary to the provisions of N.J.S.A. 2C:13-8a(3);
- 2. Knowingly provide services, resources, or assistance, including financial support, business services, lodging, and transportation, to another with the knowledge that the services, resources, or assistance were intended to be used in furtherance of the commission of the crime of human trafficking, in violation of N.J.S.A. 2C:13-8, contrary to the provisions of N.J.S.A.
- 3. Knowingly procure or attempt to procure a person to engage in sexual activity, or to provide labor or services, whether

for herself or another person, knowing that the person provided or to be provided was a victim of human trafficking, or under circumstances which a reasonable person would conclude that there was a substantial likelihood that the person was a victim of human trafficking, contrary to the provisions of $N.J.S.A.\ 2C:13-9$;

- 4. Knowingly promote prostitution of a child under 18, contrary to N.J.S.A. 2C:34-1b(3).
- 5. Knowingly cause or permit a child under the age of 18 to engage in a prohibited sexual act which they knew, had reason to know or intended that the prohibited act would be photographed, filmed, or reproduced, or reconstructed in any manner, including the Internet, contrary to $N.J.S.A.\ 2C:24-4b(3)$.
- 6. Knowingly photograph a child under 18 years of age in a prohibited sexual act or in in the simulation of such an act, or used a device, including a computer, to reproduce or reconstruct the image of a child in a prohibited sexual act or in the simulation of such an act, contrary to the provisions of N.J.S.A. 2C:24-4b(4).
- 7. Knowingly distribute, by any means, including, but not limited to, the Internet, items depicting the sexual exploitation or abuse of a child under 18 years of age, contrary to the provisions of N.J.S.A. 2C:24-4b(5)(a)(i).
- 8. Knowingly possess with intent to distribute items depicting the sexual exploitation or abuse of a child under 18 years

of age, contrary to the provisions of N.J.S.A. 2C:24-4b(5)(a)(ii).

9. Having assumed responsibility for the care of B.S., born December 13, 1998, knowingly engaged in sexual conduct which would impair or debauch the morals of B.S., contrary to the provisions of N.J.S.A. 2C:24-4a(1).

All in violation of $\underline{\text{N.J.S.A.}}$ 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Human Trafficking - First Degree)

CHRISTOPHER WHITE

and

ADRIA REGN

between on or about October 8, 2016, and on or about October 17, 2016, at the Township of Pemberton, and at the Borough of Wrightstown, both in the County of Burlington, elsewhere, and within the jurisdiction of this Court, knowingly did hold, recruit, lure, entice, harbor, transport, provide or obtain, a child under 18 years of age, that is, B.S., born December 13, 1998, to engage in sexual activity, contrary to the provisions of N.J.S.A. 2C:13-8a(3), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Facilitating Human Trafficking - Second Degree)

CHRISTOPHER WHITE

and

ADRIA REGN

between on or about October 8, 2016, and on or about October 17, 2016, at the Township of Pemberton, and at the Borough of Wrightstown, both in the County of Burlington, elsewhere, and within the jurisdiction of this Court, knowingly did provide services, resources, or assistance, including financial support, business services, lodging, and transportation, to another with knowledge that the services, resources, or assistance were intended to be used in furtherance of the commission of the crime of human trafficking in violation of N.J.S.A. 2C:13-8, contrary to the provisions of N.J.S.A. 2C:13-9a(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Facilitating Human Trafficking - Second Degree)

CHRISTOPHER WHITE

and

ADRIA REGN

between on or about October 8, 2016, and on or about October 17, 2016, at the Township of Pemberton, and at the Borough of Wrightstown, both in the County of Burlington, elsewhere, and within the jurisdiction of this Court, knowingly did procure or attempt to procure a person to engage in sexual activity, or to provide labor or services, whether for herself or another person, knowing that the person was a victim of human trafficking, or under circumstances which a reasonable person would conclude that there was a substantial likelihood that the person was a victim of human trafficking, contrary to the provisions of N.J.S.A. 2C:13-9a(2), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Promoting Prostitution - First Degree) CHRISTOPHER WHITE

and

ADRIA REGN

between on or about October 8, 2016, and on or about October 17, 2016, at the Township of Pemberton, and at the Borough of Wrightstown, both in the County of Burlington, elsewhere, and within the jurisdiction of this Court, knowingly did promote the prostitution of a child under 18, that is, B.S., born December 13, 1998, contrary to the provisions of N.J.S.A. 2C:34-1b(3), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Promoting Organized Street Crime - First Degree)

CHRISTOPHER WHITE

and

ADRIA REGN

between on or about October 8, 2016, and on or about October 17, 2016, at the Township of Pemberton, and at the Borough of Wrightstown, both in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did conspire with others as an organizer, supervisor, financier or manager to promote prostitution, in violation of N.J.S.A. 2C:34-1b(3), contrary to the provisions of N.J.S.A. 2C:33-30, N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Endangering Welfare of Children - First Degree)

CHRISTOPHER WHITE

and

ADRIA REGN

between on or about October 8, 2016, and on or about October 17, 2016, at the Township of Pemberton, and at the Borough of Wrightstown, both in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did knowingly cause or permit a child under 18 years of age, that is, B.S., born December 13, 1998, to engage in a prohibited sexual act or in the simulation of such an act, as defined by N.J.S.A. 2C:24-4b(1), which they knew, had reason to know or intended that the prohibited act would be photographed, filmed, or reproduced, or reconstructed in any manner, including the Internet, contrary to the provisions of N.J.S.A. 2C:24-4b(3), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Endangering Welfare of Children - Second Degree)

CHRISTOPHER WHITE

and

ADRIA REGN

between on or about October 8, 2016, and on or about October 17, 2016, at the Township of Pemberton, and at the Borough of Wrightstown, both in the County of Burlington, elsewhere, and within the jurisdiction of this Court, did photograph a child under 18 years of age, that is, B.S., born December 13, 1998, in a prohibited sexual act or in in the simulation of such an act, or used a device, including a computer, to reproduce or reconstruct the image of a child in a prohibited sexual act or in the simulation of such an act, as defined by N.J.S.A. 2C:24-4b(1), contrary to the provisions of N.J.S.A. 2C:24-4b(4), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Endangering Welfare of Children - Second Degree)

CHRISTOPHER WHITE

and

ADRIA REGN

between on or about October 8, 2016, and on or about October 17, 2016, at the Township of Pemberton, and at the Borough of Wrightstown, both in the County of Burlington, elsewhere, and within the jurisdiction of this Court, knowingly did distribute, by any means, including, but not limited to, the Internet, items depicting the sexual exploitation or abuse of a child under 18 years of age, that is, B.S., born December 13, 1998, as defined by N.J.S.A. 2C:24-4b(1), contrary to the provisions of N.J.S.A. 2C:24-4b(5)(a)(i), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Endangering Welfare of Children - Second Degree) CHRISTOPHER WHITE

and

ADRIA REGN

between on or about October 8, 2016, and on or about October 17, 2016, at the Township of Pemberton, and at the Borough of Wrightstown, both in the County of Burlington, elsewhere, and within the jurisdiction of this Court, knowingly did possess with intent to distribute items depicting the sexual exploitation or abuse of a child under 18 years of age, that is, B.S., born December 13, 1998, as defined by N.J.S.A. 2C:24-4b(1), contrary to the provisions of N.J.S.A. 2C:24-4b(5)(a)(ii), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Endangering Welfare of Children - Second Degree)

CHRISTOPHER WHITE

and

ADRIA REGN

between on or about October 8, 2016, and on or about October 17, 2016, at the Township of Pemberton, and at the Borough of Wrightstown, both in the County of Burlington, elsewhere, and within the jurisdiction of this Court, having assumed responsibility for the care of B.S., born December 13, 1998, knowingly engaged in sexual conduct which would impair or debauch the morals of B.S., contrary to the provisions of N.J.S.A. 2C:24-4a(1), N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

AAG Elie Honig

Director

NJ Division of Criminal Justice

A TRUE BILL:

Foreperse

Date: 8/14/2017