



1 MCGREGOR W. SCOTT
United States Attorney
2 BRIAN W. ENOS
Assistant United States Attorney
3 2500 Tulare Street, Suite 4401
Fresno, CA 93721
4 Telephone: (559) 497-4000
Facsimile: (559) 497-4099
5

6 Attorneys for Plaintiff
United States of America
7

8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

10 UNITED STATES OF AMERICA,
11
12 Plaintiff,
13 v.
14 NATHAN DANIEL LARSON,
15 Defendants.
16
17
18

Case No. 1:21-cr-00022-NONE-SKO

VIOLATIONS: 18 U.S.C. § 1201(a)(1), (d) and (g) –
Kidnapping and Attempt [COUNT ONE]; 18 U.S.C.
§ 2423(a) – Transportation of Minor with Intent to
Engage in Illegal Sexual Activity [COUNT TWO]; 18
U.S.C. § 2422(b) – Coercion and Enticement of
Minor [COUNT THREE]; 18 U.S.C. § 2251(a) and
(e) – Sexual Exploitation of Minor and Attempt
[COUNT FOUR]; 18 U.S.C. § 2252(a)(2) – Receipt
and Distribution of Material Involving the Sexual
Exploitation of Minors [COUNT FIVE]; 18 U.S.C.
§§ 981(a)(1)(C), 2253(a), 2428, and 28 U.S.C. §
2461(c) – Criminal Forfeiture

19 **INDICTMENT**

20 **COUNT ONE:** [18 U.S.C. § 1201(a)(1), (d) and (g) – Kidnapping and Attempt]

21 The Grand Jury charges: T H A T

22 NATHAN DANIEL LARSON,
23 defendant herein, on or about December 14, 2020, in Fresno County, within the State and Eastern
24 District of California and elsewhere, willfully and unlawfully seized, confined, inveigled, decoyed,
25 kidnapped, abducted, and carried away Victim 1, a female individual who had not attained the age of 18
26 years, and defendant traveled in interstate commerce and willfully transported Victim 1 in interstate
27 commerce, and used any means, facility, and instrumentality of interstate and foreign commerce, in
28

1 committing and in furtherance of the commission of the offense, and held Victim 1 for ransom, reward,
2 and other benefit, while the defendant was over the age of 18 years and had no legal custody or familial
3 relationship with Victim 1, and attempted to do so, all in violation of Title 18, United States Code,
4 Sections 1201(a)(1), (d) and (g).

5
6 COUNT TWO: [18 U.S.C. § 2423(a) – Transportation of Minor with Intent to Engage in Illegal Sexual
Activity]

7 The Grand Jury further charges: T H A T

8 NATHAN DANIEL LARSON,

9 defendant herein, on or about December 14, 2020, in Fresno County, within the State and Eastern
10 District of California and elsewhere, did knowingly transport a female individual, Victim 1, who had not
11 attained the age of 18 years, in interstate commerce, with the intent that such individual engage in any
12 sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18,
13 Section 2423(a).

14
15 COUNT THREE: [18 U.S.C. § 2422(b) –Coercion and Enticement of Minor]

16 The Grand Jury further charges: T H A T

17 NATHAN DANIEL LARSON,

18 defendant herein, beginning on or about November 22, 2020, and continuing through on or about
19 December 14, 2020, in Fresno County, State and Eastern District of California, the State and Eastern
20 District of Virginia, and elsewhere, using facilities and means of interstate and foreign commerce, did
21 knowingly persuade, induce, entice and coerce a female individual, Victim 1, who had not attained the
22 age of 18 years to engage in sexual activity for which any person can be charged with a criminal offense,
23 and attempted to do so, all in violation of Title 18, United States Code, Section 2422(b).

24
25 COUNT FOUR: [18 U.S.C. § 2251(a) and (e) – Sexual Exploitation of a Minor and Attempt]

26 The Grand Jury further charges: T H A T

27 NATHAN DANIEL LARSON,

28 defendant herein, beginning on a date unknown but no later than approximately November 22, 2020 and

1 continuing through approximately December 14, 2020, in Fresno County, State and Eastern District of
2 California, the State and Eastern District of Virginia, and elsewhere, and through the use of a Samsung
3 tablet computer (manufactured in China), a Samsung cellular phone (manufactured in China), and a
4 website whose Internet Protocol address resolved to a location in Europe, did knowingly employ, use,
5 persuade, induce, entice, and coerce a minor (“Victim 1”) to engage in, and did transport Victim 1 in and
6 affecting interstate commerce with the intent that Victim 1 engage in, any sexually explicit conduct, as
7 defined in Title 18, United States Code, Section 2256, for the purpose of producing any visual depiction
8 of such conduct, with knowledge and reason to know that such visual depiction would be transported
9 and transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate
10 or foreign commerce, and the visual depiction was produced or transmitted using materials that had been
11 mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including
12 by computer and cellular phone, and the visual depiction was actually transported in interstate or foreign
13 commerce using any means or facility of interstate commerce, and attempted to do so, all in violation of
14 Title 18, United States Code, Section 2251(a) and (e).

15
16 COUNT FIVE: [18 U.S.C. § 2252(a)(2) – Receipt and Distribution of Material Involving the Sexual
Exploitation of Minors]

17 The Grand Jury further charges: T H A T

18 NATHAN DANIEL LARSON,

19 defendant herein, beginning on a date unknown but no later than approximately November 22, 2020 and
20 continuing through approximately December 14, 2020, in Fresno County, within the State and Eastern
21 District of California, the State and Eastern District of Virginia, and elsewhere and through the use of a
22 Samsung tablet computer, manufactured in China, a Samsung cellular phone, manufactured in China,
23 and a website whose Internet Protocol address resolves to a location in Europe, did knowingly receive
24 and distribute at least one visual depiction, the producing of which involved at least one minor engaging
25 in sexually explicit conduct and which depiction was of such conduct, as defined in Title 18, United
26 States Code, Section 2256, and which had been shipped or transported in or affecting interstate or
27 foreign commerce, had been sent or received using any means or facility of interstate or foreign
28 commerce, and which contained materials which had been mailed, shipped, or transported in interstate

1 or foreign commerce by any means, including by computer, all in violation of Title 18, United States
2 Code, Section 2252(a)(2).

3 FORFEITURE ALLEGATION: [18 U.S.C. §§ 981(a)(1)(C), 2253(a), 2428, and 28 U.S.C. § 2461(c) –
4 Criminal Forfeiture]

5 1. Upon conviction of the offense alleged in Count One of this Indictment, defendant
6 NATHAN DANIEL LARSON shall forfeit to the United States pursuant to Title 18, United States
7 Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or
8 person, which constitutes or is derived from proceeds traceable to such offense.

9 2. Upon conviction of the offenses alleged in Counts Two and Three of this Indictment,
10 defendant NATHAN DANIEL LARSON shall forfeit to the United States pursuant to Title 18, United
11 States Code, Section 2253(a), any and all matter which contained visual depictions produced,
12 transported, mailed, or shipped or received in violation thereof; any property, real or personal,
13 constituting traceable to gross profits or other proceeds the defendant obtained as a result of said
14 violations; and any property, real or personal, used or intended to be used to commit and to promote the
15 commission of such violations, or any property traceable to such property; including but not limited to
16 the following property:

- 17 a) Samsung tablet computer, seized from defendant by law enforcement on or about
18 December 14, 2020;
- 19 b) Samsung cell phone, seized from defendant by law enforcement on or about
20 December 14, 2020; and
- 21 c) SD cards, compact discs, DVDs, hard drives, or other electronic storage devices
22 containing visual depictions of minors engaged in sexually explicit conduct and
23 seized from defendant by law enforcement on or about December 14 through 24,
24 2020.

25 3. Upon conviction of the offenses alleged in Counts Four and Five of this Indictment,
26 defendant NATHAN DANIEL LARSON shall forfeit to the United States pursuant to Title 18, United
27 States Code, Section 2428(a), any property, real or personal, that was used or intended to be used to
28 commit or to facilitate the commission of such violations, and any property, real or person, constituting

1 or derived from any proceeds that such person obtained, directly or indirectly, as a result of such
2 violation, including but not limited to the following property:

- 3 a) Samsung tablet computer, seized from defendant by law enforcement on or about
4 December 14, 2020;
- 5 b) Samsung cell phone, seized from defendant by law enforcement on or about
6 December 14, 2020; and
- 7 c) SD cards, compact discs, DVDs, hard drives, or other electronic storage devices
8 containing visual depictions of minors engaged in sexually explicit conduct and
9 seized from defendant by law enforcement on or about December 14 through 24,
10 2020.

11 4. If any property subject to forfeiture as a result of the offenses alleged in this Indictment,
12 for which defendant is convicted:

- 13 a) cannot be located upon the exercise of due diligence;
- 14 b) has been transferred or sold to, or deposited with, a third party;
- 15 c) has been placed beyond the jurisdiction of the Court;
- 16 d) has been substantially diminished in value; or
- 17 e) has been commingled with other property which cannot be divided without
18 difficulty;

19 It is the intent of the United States, pursuant to Title 18, United State Code, Section 2253(b),
20 incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of
21 said defendant, up to the value of the property subject to forfeiture.

22 A TRUE BILL.
23 /s/ Signature on file w/AUSA

24 _____
FOREPERSON

25 MCGREGOR W. SCOTT
United States Attorney

26 **KIRK E. SHERRIFF**

27 KIRK E. SHERRIFF
Assistant United States Attorney,
28 Chief, Fresno Office