

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Holding a Criminal Term

Grand Jury Sworn in on February 14, 2022

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
	:	GRAND JURY ORIGINAL
	:	
v.	:	VIOLATIONS:
	:	
RAMANAN PATHMANATHAN,	:	18 U.S.C. §§ 2251(a) and (e)
	:	(Sexual Exploitation of a Child)
	:	18 U.S.C. § 2422(b)
Defendant.	:	(Coercion and Enticement of a Minor)
	:	18 U.S.C. § 3238
	:	(Offenses Not Committed in Any District)
	:	
	:	
	:	FORFEITURE:
	:	18 U.S.C. § 2253(a)
	:	18 U.S.C. § 2428
	:	21 U.S.C. § 853(p)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Sexual Exploitation of a Child

Between on or about August 1, 2019 and on or about April 1, 2020, within Canada and elsewhere, **RAMANAN PATHMANATHAN**, knowingly employed, used, persuaded, induced, enticed, and coerced a minor, "Victim 1," whose identity is known to the Grand Jury and who was located in the State of Texas, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and attempted to do so, knowing and having reason to know

that such visual depiction would be transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; and which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce; and which visual depiction was actually transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Sexual Exploitation of a Child, in violation of Title 18, United States Code, Sections 2251(a) and (e) and 18 U.S.C. § 3238)

COUNT TWO

Sexual Exploitation of a Child

Between on or about July 6, 2020 and on or about July 26, 2020, within Canada and elsewhere, **RAMANAN PATHMANATHAN**, knowingly employed, used, persuaded, induced, enticed, and coerced a minor, "Victim 2," whose identity is known to the Grand Jury and who was located in the State of New Jersey, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; and which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce; and which visual depiction was actually transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Sexual Exploitation of a Child, in violation of Title 18, United States Code, Sections 2251(a) and (e) and 18 U.S.C. § 3238)

COUNT THREE

Sexual Exploitation of a Child

Between on or about March 1, 2018 and on or about September 21, 2020, within Canada and elsewhere, **RAMANAN PATHMANATHAN**, knowingly employed, used, persuaded, induced, enticed, and coerced a minor, “Victim 3,” whose identity is known to the Grand Jury and who was located in the State of Idaho, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; and which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce; and which visual depiction was actually transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Sexual Exploitation of a Child, in violation of Title 18, United States Code, Sections 2251(a) and (e) and 18 U.S.C. § 3238)

COUNT FOUR

Sexual Exploitation of a Child

Between on or about July 31, 2020 and on or about March 5, 2021, within Canada and elsewhere, **RAMANAN PATHMANATHAN**, knowingly employed, used, persuaded, induced, enticed, and coerced a minor, “Victim 4” and “Victim 5,” whose identity is known to the Grand Jury and who were located in the State of Indiana, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign

commerce and in and affecting interstate and foreign commerce; and which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce; and which visual depiction was actually transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Sexual Exploitation of a Child, in violation of Title 18, United States Code, Sections 2251(a) and (e) and 18 U.S.C. § 3238)

COUNT FIVE

Sexual Exploitation of a Child

Between on or about July 1, 2020 and on or about July 23, 2020, within Canada and elsewhere, **RAMANAN PATHMANATHAN**, knowingly employed, used, persuaded, induced, enticed, and coerced a minor, “Victim 6” and “Victim 7,” whose identity is known to the Grand Jury and who were located in the State of Texas, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; and which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce; and which visual depiction was actually transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Sexual Exploitation of a Child, in violation of Title 18, United States Code, Sections 2251(a) and (e) and 18 U.S.C. § 3238)

COUNT SIX

Sexual Exploitation of a Child

Between on or about January 3, 2019 and on or about August 13, 2019, within Canada and elsewhere, **RAMANAN PATHMANATHAN**, knowingly employed, used, persuaded, induced,

enticed, and coerced a minor, “Victim 8” and “Victim 9,” whose identity is known to the Grand Jury and who were located in the State of Washington, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; and which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce; and which visual depiction was actually transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Sexual Exploitation of a Child, in violation of Title 18, United States Code, Sections 2251(a) and (e) and 18 U.S.C. § 3238)

COUNT SEVEN

Sexual Exploitation of a Child

Between on or about September 26, 2018 and on or about July 25, 2020, within Canada and elsewhere, **RAMANAN PATHMANATHAN**, knowingly employed, used, persuaded, induced, enticed, and coerced a minor, “Victim 10,” whose identity is known to the Grand Jury and who was located in the State of Texas, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; and which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce; and which visual depiction was actually transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Sexual Exploitation of a Child, in violation of Title 18, United States Code, Sections 2251(a) and (e) and 18 U.S.C. § 3238)

COUNT EIGHT

Sexual Exploitation of a Child

On or about April 30, 2020, within Canada and elsewhere, **RAMANAN PATHMANATHAN**, knowingly employed, used, persuaded, induced, enticed, and coerced a minor, "Victim 11," whose identity is known to the Grand Jury and who was located in the State of Ohio, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; and which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce; and which visual depiction was actually transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Sexual Exploitation of a Child, in violation of Title 18, United States Code, Sections 2251(a) and (e) and 18 U.S.C. § 3238)

COUNT NINE

Sexual Exploitation of a Child

Between on or about March 10, 2019 and on or about April 13, 2019, within Canada and elsewhere, **RAMANAN PATHMANATHAN**, knowingly employed, used, persuaded, induced, enticed, and coerced a minor, "Victim 12," whose identity is known to the Grand Jury and who was located in the State of Rhode Island, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce

and in and affecting interstate and foreign commerce; and which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce; and which visual depiction was actually transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Sexual Exploitation of a Child, in violation of Title 18, United States Code, Sections 2251(a) and (e) and 18 U.S.C. § 3238)

COUNT TEN

Sexual Exploitation of a Child

Between on or about May 1, 2019 and on or about September 8, 2019, within Canada and elsewhere, **RAMANAN PATHMANATHAN**, knowingly employed, used, persuaded, induced, enticed, and coerced a minor, "Victim 13," whose identity is known to the Grand Jury and who was located in the State of North Carolina, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce; and which visual depiction was produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce; and which visual depiction was actually transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Sexual Exploitation of a Child, in violation of Title 18, United States Code, Sections 2251(a) and (e) and 18 U.S.C. § 3238)

COUNT ELEVEN

Coercion and Enticement of a Minor

Between on or about March 18, 2014 and on or about March 10, 2021, within Canada and elsewhere, **RAMANAN PATHMANATHAN**, did and attempted to, use any facility and

means of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce any individual, who was located in the United States and who had not attained the age of 18 years, to engage in any sexual activity for which any person could be charged with an offense, including, but not limited to, the Sexual Exploitation of a Child, in violation of 18 U.S.C. §§ 2251(a) and (e).

(Coercion and Enticement of a Minor, in violation of Title 18, United States Code, Section 2422(b) and 18 U.S.C. § 3238)

FORFEITURE ALLEGATIONS

1. Upon conviction of the offenses alleged in Counts One through Eleven, the defendant shall forfeit to the United States any and all matters which contain visual depictions of minors engaged in sexually explicit conduct in violation of the charged offenses; any property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violations, including but not limited to the following:

- (1) One Rogers USB Drive
- (2) One HP Laptop (Model Pavilion dv6700, Serial No. CNF7503YB9)
- (3) One Samsung Cellular Telephone (Model SM-A105M, Serial No. R58M82QPM4H)
- (4) Black Sony PS4 Game Console (Model PS4, Serial No. MB093816779)
- (5) Gateway Desktop (Model FX6860-EF30P, Serial No. PTGCQP200113406BA09200)

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

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

the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to 21 United States Code, Section 853(p).

(Criminal Forfeiture, pursuant to Title 18, United States Code, Sections 2253(a) and 2428, and Title 21, United States Code, Section 853(p))

A TRUE BILL

FOREPERSON

A handwritten signature in blue ink that reads "Matthew M. Craves by AEL". The signature is written in a cursive, flowing style.

and for the District of Columbia.