

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. -

: **INDICTMENT**

: 14 Cr.

MATTHEW VADO, :

Defendant. :

- - - - - X

COUNT ONE

(Production of Child Pornography)

The Grand Jury charges:

1. From at least in or about June 2013 up to and including at least in or about February 2014, in the Southern District of New York and elsewhere, MATTHEW VADO, the defendant, willfully and knowingly did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a 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 had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and was

actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, to wit, VADO induced "Victim-1," a minor, to send sexually explicit images of Victim-1 to VADO over the Internet.

(Title 18, United States Code, Sections 2251(a), (e), and 2.)

COUNT TWO

(Production of Child Pornography)

The Grand Jury further charges:

2. In or about February 2014, in the Southern District of New York and elsewhere, MATTHEW VADO, the defendant, willfully and knowingly did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a 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 had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and

foreign commerce, to wit, VADO induced "Victim-2," a minor, to send sexually explicit images of Victim-2 to VADO over the Internet.

(Title 18, United States Code, Sections 2251(a), (e), and 2.)

COUNT THREE

(Production of Child Pornography)

The Grand Jury further charges:

3. From at least in or about March 2014 up to and including at least in or about June 2014, in the Southern District of New York and elsewhere, MATTHEW VADO, the defendant, willfully and knowingly did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a 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 had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, to wit, VADO induced "Victim-3," a minor, to send sexually explicit images of Victim-3 to VADO over the Internet.

(Title 18, United States Code, Sections 2251(a), (e), and 2.)

COUNT FOUR

(Production of Child Pornography)

The Grand Jury further charges:

4. In or about April 2014, in the Southern District of New York and elsewhere, MATTHEW VADO, the defendant, willfully and knowingly did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a 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 had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, to wit, VADO induced "Victim-4," a minor, to send sexually explicit images of Victim-4 to VADO over the Internet.

(Title 18, United States Code, Sections 2251(a), (e), and 2.)

COUNT FIVE

(Production of Child Pornography)

The Grand Jury further charges:

5. In or about April 2014, in the Southern District of New York and elsewhere, MATTHEW VADO, the defendant, willfully and knowingly did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a 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 had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, to wit, VADO induced "Victim-5," a minor, to send sexually explicit images of Victim-5 to VADO over the Internet.

(Title 18, United States Code, Sections 2251(a), (e), and 2.)

COUNT SIX

(Production of Child Pornography)

The Grand Jury further charges:

6. From at least in or about April 2014 up to and including at least in or about June 2014, in the Southern District of New York and elsewhere, MATTHEW VADO, the defendant, willfully and knowingly did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a 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 had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, to wit, VADO induced "Victim-6," a minor, to send sexually explicit images of Victim-6 to VADO over the Internet.

(Title 18, United States Code, Sections 2251(a), (e), and 2.)

COUNT SEVEN

(Production of Child Pornography)

The Grand Jury further charges:

7. In or about May 2014, in the Southern District of New York and elsewhere, MATTHEW VADO, the defendant, willfully and knowingly did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a 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 had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, to wit, VADO induced "Victim-7," a minor, to send sexually explicit images of Victim-7 to VADO over the Internet.

(Title 18, United States Code, Sections 2251(a), (e), and 2.)

COUNT EIGHT

(Production of Child Pornography)

The Grand Jury further charges:

8. In or about June 2014, in the Southern District of New York and elsewhere, MATTHEW VADO, the defendant, willfully and knowingly did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a 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 had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, to wit, VADO induced "Victim-8," a minor, to send sexually explicit images of Victim-8 to VADO over the Internet.

(Title 18, United States Code, Sections 2251(a), (e), and 2.)

COUNT NINE

(Receipt of Child Pornography)

The Grand Jury further charges:

9. From at least in or about June 2013 up to and including at least in or about June 2014, in the Southern District of New York and elsewhere, MATTHEW VADO, the defendant, knowingly did receive materials that contained child pornography, which, using a means and facility of interstate commerce, had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, VADO received communications over the internet sent from minors containing sexually explicit images of those minors.

(Title 18, United States Code, Sections 2252A(a) (2) (B),
(b) (1), and 2.)

COUNT TEN

(Possession of Child Pornography)

The Grand Jury further charges:

1. From at least in or about June 2013 up to and including at least in or about June 2014, in the Southern District of New York and elsewhere, MATTHEW VADO, the defendant, knowingly did possess and access with intent to view a book, magazine, periodical, film, videotape, computer disk, and other material that contained an image of child pornography that had been mailed, and shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any

means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, VADO possessed in New York, New York images of child pornography, including images of minors who had not yet attained 12 years of age.

(Title 18, United States Code, Sections 2252A(a) (5) (B),
(b) (2), and 2.)



FOREPERSON

A handwritten signature in cursive script that reads "Preet Bharara".

PREET BHARARA
United States Attorney

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(18 U.S.C. §§ 2251(a) & (e), 2252A (a)(2)(B) & (b)(1),
2252A(a)(5)(B) & (b)(2), and 2.)

PREET BHARARA
United States Attorney.

A TRUE BILL

Foreperson.

