

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : **CRIMINAL NO.**
v. : **DATE FILED: Dec. 8, 2011**
JOHN ANGELL : **VIOLATIONS: 18 U.S.C. § 2423(b)**
 : **(traveling for the purpose of engaging**
 : **in sex with a minor - 8 counts)**
 : **18 U.S.C. § 2241(c) (aggravated sexual**
 : **abuse of a child - 8 counts)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, defendant JOHN ANGELL was a resident of the state of Delaware. Minor 1, whose name is known to the grand jury, was a resident of the state of New York.

2. Between on or about June 1, 2001 through on or about June 30, 2007, defendant JOHN ANGELL worked as a driver for the father of Minor 1 and Minor 2, whose names are known to the grand jury. On numerous weekends, defendant JOHN ANGELL drove Minor 1 and Minor 2 from their mother's house in Plainview, New York, through the state of New Jersey, to their father's house in Blue Bell, Pennsylvania, and then returned them to their mother's house in New York at the end of the weekend.

3. On many such occasions, Minor 2 did not visit the father, and therefore, Minor 1 was alone with defendant JOHN ANGELL. On these occasions, defendant perpetrated sexual acts upon Minor 1 at certain rest stop locations between Pennsylvania and New York.

4. Between on or about January 16, 2004, and on or about January 19, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

JOHN ANGELL,

traveled in interstate commerce for the purpose of engaging in any illicit sexual conduct, to wit, defendant ANGELL transported Minor 1, whose name is known to the grand jury, and who was under the age of 12, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transit, engaged in sexual acts with Minor 1, which would be a violation of Section 2241.

In violation of Title 18, United States Code, Section 2423(b).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are incorporated herein by reference.
2. Between on or about October 15, 2004, and on or about October 17, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

JOHN ANGELL,

traveled in interstate commerce for the purpose of engaging in any illicit sexual conduct, to wit, defendant ANGELL transported Minor 1, whose name is known to the grand jury, and who was under the age of 12, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transit, engaged in sexual acts with Minor 1, which would be a violation of Section 2241.

In violation of Title 18, United States Code, Section 2423(b).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are incorporated herein by reference.
2. Between on or about November 5, 2004, and on or about November 7, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

JOHN ANGELL,

traveled in interstate commerce for the purpose of engaging in any illicit sexual conduct, to wit, defendant ANGELL transported Minor 1, whose name is known to the grand jury, and who was under the age of 12, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transit, engaged in sexual acts with Minor 1, which would be a violation of Section 2241.

In violation of Title 18, United States Code, Section 2423(b).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are incorporated herein by reference.

2. Between on or about November 12, 2004, and on or about November 14, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

JOHN ANGELL,

traveled in interstate commerce for the purpose of engaging in any illicit sexual conduct, to wit, defendant ANGELL transported Minor 1, whose name is known to the grand jury, and who was under the age of 12, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transit, engaged in sexual acts with Minor 1, which would be a violation of Section 2241.

In violation of Title 18, United States Code, Section 2423(b).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are incorporated herein by reference.
2. Between on or about January 21, 2005, and on or about January 23, 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

JOHN ANGELL,

traveled in interstate commerce for the purpose of engaging in any illicit sexual conduct, to wit, defendant ANGELL transported Minor 1, whose name is known to the grand jury, and who was under the age of 12, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transit, engaged in sexual acts with Minor 1, which would be a violation of Section 2241.

In violation of Title 18, United States Code, Section 2423(b).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are incorporated herein by reference.
2. Between on or about February 3, 2005, and on or about February 7, 2005, in the

Eastern District of Pennsylvania and elsewhere, defendant

JOHN ANGELL,

traveled in interstate commerce for the purpose of engaging in any illicit sexual conduct, to wit, defendant ANGELL transported Minor 1, whose name is known to the grand jury, and who was under the age of 12, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transit, engaged in sexual acts with Minor 1, which would be a violation of Section 2241.

In violation of Title 18, United States Code, Section 2423(b).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are incorporated herein by reference.
2. Between on or about February 25, 2005, and on or about February 27, 2005, in the Eastern District of Pennsylvania and elsewhere, defendant

JOHN ANGELL,

traveled in interstate commerce for the purpose of engaging in any illicit sexual conduct, to wit, defendant ANGELL transported Minor 1, whose name is known to the grand jury, and who was under the age of 12, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transit, engaged in sexual acts with Minor 1, which would be a violation of Section 2241.

In violation of Title 18, United States Code, Section 2423(b).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are incorporated herein by reference.
2. Between on or about March 11, 2005, and on or about March 13, 2005, in the

Eastern District of Pennsylvania and elsewhere, defendant

JOHN ANGELL,

traveled in interstate commerce for the purpose of engaging in any illicit sexual conduct, to wit, defendant ANGELL transported Minor 1, whose name is known to the grand jury, and who was under the age of 12, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transit, engaged in sexual acts with Minor 1, which would be a violation of Section 2241.

In violation of Title 18, United States Code, Section 2423(b).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count one are incorporated herein by reference.

Between in or about January 16, 2004, and on or about January 19, 2004, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN ANGELL

crossed a State line with intent to engage in a sexual act with a person who had not attained the age of 12 years, and attempted to do so, to wit, defendant ANGELL, a resident of Delaware, transported Minor 1, whose name is known to the grand jury, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transport, engaged in sexual acts with Minor 1, who had not attained the age of 12 years.

In violation of Title 18, United States Code, Section 2241(c).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count one are incorporated herein by reference.
2. Between in or about October 15, 2004, and on or about October 17, 2004, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN ANGELL

crossed a State line with intent to engage in a sexual act with a person who had not attained the age of 12 years, and attempted to do so, to wit, defendant ANGELL, a resident of Delaware, transported Minor 1, whose name is known to the grand jury, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transport, engaged in sexual acts with Minor 1, who had not attained the age of 12 years.

In violation of Title 18, United States Code, Section 2241(c).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count one are incorporated herein by reference.
2. Between in or about November 5, 2004, and on or about November 7, 2004, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN ANGELL

crossed a State line with intent to engage in a sexual act with a person who had not attained the age of 12 years, and attempted to do so, to wit, defendant ANGELL, a resident of Delaware, transported Minor 1, whose name is known to the grand jury, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transport, engaged in sexual acts with Minor 1, who had not attained the age of 12 years.

In violation of Title 18, United States Code, Section 2241(c).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count one are incorporated herein by reference.
2. Between in or about November 12, 2004, and on or about November 14, 2004, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN ANGELL

crossed a State line with intent to engage in a sexual act with a person who had not attained the age of 12 years, and attempted to do so, to wit, defendant ANGELL, a resident of Delaware, transported Minor 1, whose name is known to the grand jury, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transport, engaged in sexual acts with Minor 1, who had not attained the age of 12 years.

In violation of Title 18, United States Code, Section 2241(c).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count one are incorporated herein by reference.
2. Between in or about January 21, 2005, and on or about January 23, 2005, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN ANGELL

crossed a State line with intent to engage in a sexual act with a person who had not attained the age of 12 years, and attempted to do so, to wit, defendant ANGELL, a resident of Delaware, transported Minor 1, whose name is known to the grand jury, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transport, engaged in sexual acts with Minor 1, who had not attained the age of 12 years.

In violation of Title 18, United States Code, Section 2241(c).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count one are incorporated herein by reference.
2. Between in or about February 3, 2005, and on or about February 7, 2005, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN ANGELL

crossed a State line with intent to engage in a sexual act with a person who had not attained the age of 12 years, and attempted to do so, to wit, defendant ANGELL, a resident of Delaware, transported Minor 1, whose name is known to the grand jury, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transport, engaged in sexual acts with Minor 1, who had not attained the age of 12 years.

In violation of Title 18, United States Code, Section 2241(c).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count one are incorporated herein by reference.
2. Between in or about February 25, 2005, and on or about February 27, 2005, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN ANGELL

crossed a State line with intent to engage in a sexual act with a person who had not attained the age of 12 years, and attempted to do so, to wit, defendant ANGELL, a resident of Delaware, transported Minor 1, whose name is known to the grand jury, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transport, engaged in sexual acts with Minor 1, who had not attained the age of 12 years.

In violation of Title 18, United States Code, Section 2241(c).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count one are incorporated herein by reference.
2. Between in or about March 11, 2005, and on or about March 13, 2005, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN ANGELL

crossed a State line with intent to engage in a sexual act with a person who had not attained the age of 12 years, and attempted to do so, to wit, defendant ANGELL, a resident of Delaware, transported Minor 1, whose name is known to the grand jury, from Plainview, New York, to Blue Bell, Pennsylvania, and from Blue Bell, Pennsylvania, to Plainview, New York, and during transport, engaged in sexual acts with Minor 1, who had not attained the age of 12 years.

In violation of Title 18, United States Code, Section 2241(c).

A TRUE BILL:

FOREPERSON



ZANE DAVID MEMEGER
United States Attorney