
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. André M. Espinosa, U.S.M.J.
	:	
	:	Mag. No. 22-11359 (AME)
v.	:	
	:	CRIMINAL COMPLAINT
DIEGO RAMOS	:	

I, Monica Cueto, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached page and made a part hereof.

s/ *Monica Cueto*

Monica Cueto, Special Agent
Federal Bureau of Investigation

SA Cueto attested to this Complaint
by telephone pursuant to FRCP 4.1(b)(2)(A)
on November 29, 2022 in the District of New Jersey

s/ *Honorable Andre M. Espinosa*

HONORABLE ANDRÉ M. ESPINOSA
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

COUNT 1
(Sexual Exploitation of a Child)

From at least on or about May 29, 2021 through on or about November 29, 2022, in the District of New Jersey, and elsewhere, the defendant,

DIEGO RAMOS,

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, 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 commerce, and which visual depiction has actually been transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a).

COUNT 2
(Attempted Enticement of a Minor)

From on or about November 18, 2022 through on or about November 29, 2022, in the District of New Jersey and elsewhere, the defendant,

DIEGO RAMOS,

did knowingly use a facility and means of interstate and foreign commerce to attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a criminal offense, namely, production of child pornography, contrary to Title 18, United States Code, Sections 2251(a) and (e) and Section 2.

In violation of Title 18, United States Code, Section 2422(b) and Section 2.

ATTACHMENT B

I, Monica Cueto, am a Special Agent of the Federal Bureau of Investigation (“FBI”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other items of evidence. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where statements of others are related herein, they are related in substance and part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. From at least on or about May 28, 2021 through on or about November 29, 2022, Defendant Diego Ramos (“RAMOS”) used multiple Instagram accounts (the “Instagram Accounts”), and other social media and messaging platforms to successfully coerce a now-17-year-old minor female (“Victim-1”) who resides in or around Middlesex County, New Jersey to send sexually explicit images and videos of herself to RAMOS; to threaten Victim-1 with public exposure if she did not send additional sexually explicit images and videos requested by RAMOS; and to cause Victim-1 to pay RAMOS approximately \$12,982 to stop him from publicly releasing sexually explicit images and videos Victim-1 previously sent to RAMOS.

2. During this time period, RAMOS regularly requested nude images and videos and directed Victim-1 as to how to position herself in sexually explicit images and videos.

3. For example, in a series of messages exchanged on or about May 29, 2021, RAMOS used one of the Instagram Accounts (“Instagram Account-1”), to instruct Victim-1 to send an image “with your pussy out” and to “take off your socks and remove your hand.” Victim-1 sent several sexually explicit images of herself in response that complied with RAMOS’ instructions.

4. RAMOS also threatened Victim-1 if she refused to comply with his demands to provide sexually explicit images and videos.

5. For example, on or about March 28, 2022, RAMOS, using Instagram Account-1, told Victim-1 to send RAMOS sexually explicit videos or images of Victim-1 and threatened her with public disclosure of other images if she did not comply.

6. Specifically, RAMOS sent Victim-1 an Instagram message demanding, "Send videos or pictures or post on twitter," threatening to disclose sexually explicit videos or images of Victim-1 on the Twitter social media platform if Victim-1 refused to comply with RAMOS' demand. RAMOS further messaged Victim-1 that he wanted these images, because he "want[s] to jerk off."

7. In or around March 2022, RAMOS began requesting sexually explicit images of Victim-1's younger sister ("Victim-2"), who was, at the time, approximately 15 years old. Victim-1 provided these images to RAMOS, along with sexually explicit images and videos of Victim-1.

8. For example, on or about March 28, 2022, RAMOS instructed Victim-1 to obtain images of Victim-2 by leaving Victim-1's cellular telephone in Victim-2's bedroom while Victim-2 changed. In an Instagram message sent over Instagram Account-1, RAMOS told Victim-1, "You would rather sneak the phone in her room while she nude or ask her to take one with your something." In response, to avoid involving Victim-2, Victim-1 sent RAMOS, to the address for Instagram Account-1, multiple videos of Victim-1 engaging in various explicit sexual acts, including a video of Victim-1 engaging in sexual intercourse with an unidentified male.

9. In or around September 2021, RAMOS began demanding money from Victim-1 in exchange for RAMOS not releasing sexually explicit videos or images of Victim-1. In response to these demands, between in or around September 2021 through in or around November 2022, Victim-1 paid approximately \$12,982 to RAMOS via an online banking application.

10. From on or about November 18, 2022 through on or about November 29, 2022, with the permission of Victim-1, law enforcement took control of Victim-1's cellular telephone, including Victim-1's Twitter account, and communicated with RAMOS while posing as Victim-1.

11. On or about November 18, 2022, RAMOS sent messages to Victim-1 using a Twitter account, and those messages were received by law enforcement. In the messages, RAMOS demanded that Victim-1 send RAMOS money and threatened that, if Victim-1 refused, RAMOS would disclose sexually explicit images of Victim-1 to her parents and friends. Specifically, RAMOS wrote to Victim-1, "I'm keeping the pics just in case so you can send the cash and send \$450 . . . you can sit here and ignore me but it you do going to send the shit to your mother and not only your pics your sister as well."

12. On or about November 23, 2022, while law enforcement was controlling Victim-1's cellular telephone, RAMOS sent Victim-1 a contact request from a new Instagram account, which law enforcement accepted. RAMOS then sent to Victim-1's Instagram account a collage of approximately 67 sexually explicit images of Victim-1 and Victim-2.