

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JORGE ALBERTO RAMOS,

Defendant.

SEALED INDICTMENT

23 Cr.

COUNT ONE

**(Inducement to Travel to Engage in Unlawful Sexual Activity)
(Victim-1)**

The Grand Jury charges:

OVERVIEW

1. Over the course of several years, between at least in or about 2013 and in or about 2023, JORGE ALBERTO RAMOS, the defendant, induced, enticed, and persuaded women with promises of a better life, including educational and other opportunities, to travel from El Salvador to the Bronx, New York, where he raped, sexually assaulted, and sexually abused them. RAMOS groomed at least three women (“Victim-1,” “Victim-2,” and “Victim-3,” and together, the “Victims”) by express concern for them and their families and by sending them gifts and money. RAMOS arranged for each of the Victims to be smuggled from El Salvador into the United States, including by paying fees for smugglers (or “coyotes”) to transport the Victims across the United States border. RAMOS induced at least two of the Victims to travel from El Salvador to the Bronx so that RAMOS could force them to engage in unlawful sex acts with him on demand.

2. Once the Victims were transported to New York, JORGE ALBERTO RAMOS, the defendant, brought each of the Victims, respectively and at different times, to his residence in the Bronx (the “Ramos Residence”). Once at the Ramos Residence, RAMOS raped, sexually

assaulted, and sexually abused the Victims. RAMOS raped, sexually assaulted, and sexually abused Victim-1 on the first day he brought Victim-1 to the Ramos Residence, and he continued to do so for several weeks until Victim-1 fled from RAMOS. RAMOS raped, sexually assaulted, and sexually abused Victim-2 on the first day he brought Victim-2 to the Ramos Residence, and he continued to do so for approximately one month until Victim-2 fled from RAMOS. RAMOS raped, sexually assaulted, and sexually abused Victim-3 on at least three occasions starting approximately one month after he brought Victim-3 to the Ramos Residence. While the Victims stayed at the Ramos Residence, RAMOS attempted to control the Victims by, among other things, ordering the Victims to stay inside the Ramos Residence, attempting to isolate the Victims from other people, and threatening to report the Victims to immigration officials for deportation back to El Salvador.

FACTUAL BACKGROUND

The Defendant

3. JORGE ALBERTO RAMOS, the defendant, was born in El Salvador in or about 1979. At all times relevant to this Indictment, RAMOS maintained relationships with family, friends, and contacts who lived in El Salvador, including in or about the San Miguel area. RAMOS met and knew the Victims through family members and contacts who lived in El Salvador.

4. At all times relevant to this Indictment, JORGE ALBERTO RAMOS, the defendant, lived in the Bronx at the Ramos Residence, and was employed as an adjunct professor of chemistry at a public university in New York.

Victim-1

5. Victim-1 was born in El Salvador in or about 1987, and she resided there until in or about December 2015.

6. In or about November 2015, JORGE ALBERTO RAMOS, the defendant, offered to pay to smuggle Victim-1, who was approximately 27 years old at the time, to the United States from El Salvador. RAMOS communicated with Victim-1, and during these communications, RAMOS expressed concern and care for Victim-1 and Victim-1's family. RAMOS sent Victim-1 money and gifts through a personal contact ("CC-1"), who delivered the money and gifts to Victim-1 in El Salvador. RAMOS told Victim-1 that when Victim-1 arrived in the United States, RAMOS would take care of Victim-1, and they would have a romantic relationship.

7. In or about November 2015, JORGE ALBERTO RAMOS, the defendant, told Victim-1, in substance and in part, that he had arranged for Victim-1 to be smuggled from El Salvador to the United States through Guatemala and Mexico.

8. In or about December 2015, while crossing into the United States, Victim-1 was stopped by agents of U.S. Customs and Border Protection ("CBP") and held in CBP custody for approximately two months.

9. In or about February 2016, JORGE ALBERTO RAMOS, the defendant, paid approximately \$4,000 for Victim-1 to be released from CBP custody. RAMOS also purchased an airline ticket from Texas to New York for Victim-1.

10. On or about February 12, 2016, JORGE ALBERTO RAMOS, the defendant, met Victim-1 at the airport and transported Victim-1 to the Ramos Residence. When Victim-1 met RAMOS at the airport in New York, Victim-1 noticed that RAMOS's demeanor had changed; RAMOS was aggressive and angry, whereas on their prior phone calls, he had been caring.

11. On the same day that Victim-1 arrived at the Ramos Residence, JORGE ALBERTO RAMOS, the defendant, told Victim-1, in substance and in part, that she had to sexually service him. RAMOS forced Victim-1 to have sex, including vaginal and anal sexual intercourse. From

that day forward, until Victim-1 fled from RAMOS, RAMOS routinely forced Victim-1 to have sex.

12. While Victim-1 stayed with JORGE ALBERTO RAMOS, the defendant, RAMOS prohibited Victim-1 from leaving the Ramos Residence. RAMOS threatened Victim-1 by telling her, in substance and in part, that RAMOS would report Victim-1 to immigration officials, and she would be deported from the United States.

Victim-2

13. Victim-2 was born in El Salvador in or about 1998, and she resided there until in or about January 2017.

14. In or about September 2016, when Victim-2 was approximately 18 years old, Victim-2 was introduced to JORGE ALBERTO RAMOS, the defendant, who was approximately 37 years old, through one of RAMOS's family members who lived in El Salvador ("Individual-1"). Individual-1 asked Victim-2 to speak with RAMOS approximately every week, so Victim-2 could assist Individual-1 in retrieving money that RAMOS would regularly send to Individual-1.

15. In or about October 2016, JORGE ALBERTO RAMOS, the defendant, sent Victim-2 a cellphone via CC-1 so that RAMOS could communicate with Victim-2. RAMOS told Victim-2, in substance and in part, that he wanted to help Victim-2 travel to the United States for educational and work opportunities because, among other things, Victim-2 was poor. RAMOS also said that, while in the United States, Victim-2 would not be expected to engage in a romantic relationship with him. RAMOS began sending money and gifts to Victim-2.

16. In or about October 2016, JORGE ALBERTO RAMOS, the defendant, told Victim-2 that he would pay a smuggler to transport Victim-2 into the United States, but RAMOS

needed time to get the money together. RAMOS delivered approximately \$3,000 to Victim-2, through CC-1, as an initial payment to be paid to smugglers to transport Victim-2 into the United States.

17. In or about January 2017, Victim-2 traveled with smugglers from El Salvador to the United States. When Victim-2 reached the border between Guatemala and Mexico, the smugglers demanded an additional payment of approximately \$1,500, which JORGE ALBERTO RAMOS, the defendant, paid. When Victim-2 reached the border between Mexico and the United States, the smugglers demanded an additional payment of approximately \$1,500, which RAMOS paid. In or about March 2017, Victim-2 was then transported from Texas to New York to meet RAMOS.

18. In or about March 2017, on the same day that Victim-2 arrived in New York, JORGE ALBERTO RAMOS, the defendant, brought Victim-2 to the Ramos Residence. As soon as they arrived at the Ramos Residence, RAMOS told Victim-2 that he wanted to have sex with her, and that RAMOS had brought Victim-2 to the United States to be, in sum and substance, “his woman” and for no other reason. Despite Victim-2’s verbal and physical resistance, RAMOS kissed Victim-2, grabbed Victim-2’s breasts, and threw Victim-2 on the bed. RAMOS threatened Victim-2 by stating, in substance and in part, that RAMOS would report Victim-2 to immigration officials, among other things. RAMOS then raped Victim-2.

19. In the weeks that followed, JORGE ALBERTO RAMOS, the defendant, continued to demand sex from Victim-2. RAMOS also continued to threaten Victim-2 by stating, in substance and in part, that RAMOS would report Victim-2 to immigration officials, among other things. Through these threats and physical force, RAMOS forced Victim-2 to have sex, including anal and vaginal sex, until Victim-2 fled from RAMOS.

20. While Victim-2 stayed at the Ramos Residence, JORGE ALBERTO RAMOS, the defendant, directed Victim-2 to remain within the Ramos Residence because, according to RAMOS, immigration officials were everywhere.

21. In or about the end of April 2017, JORGE ALBERTO RAMOS, the defendant, again demanded sex from Victim-2. Victim-2 then fled from RAMOS.

Victim-3

22. Victim-3 was born in El Salvador in or about 1988, and she resided there until in or about 2013.

23. In or about 2013, JORGE ALBERTO RAMOS, the defendant, met Victim-3, who was approximately 25 years old and resided in El Salvador at the time. After meeting Victim-3, RAMOS sent Victim-3 money to purchase a cellphone so that RAMOS could communicate with Victim-3. RAMOS asked Victim-3 to be his girlfriend and told Victim-3 that he would arrange to have her brought into the United States.

24. In or about 2013 or 2014, JORGE ALBERTO RAMOS, the defendant, made arrangements to smuggle Victim-3 from El Salvador into the United States. RAMOS sent one of Victim-3's family members in El Salvador approximately \$3,500 to pay a smuggler to transport Victim-3 from El Salvador. Victim-3 was smuggled into the United States, where one of her family members transported her to the east coast. RAMOS then caused Victim-3 to travel to him in New York, where she was to live in the Ramos Residence.

25. From in or about 2013 to in or about 2014, Victim-3 stayed with JORGE ALBERTO RAMOS, the defendant, in the Ramos Residence. Victim-3 believed that she and RAMOS were in a romantic relationship. During the first month that Victim-3 resided with RAMOS, RAMOS was kind to Victim-3, but prohibited Victim-3 from leaving the Ramos

Residence. When Victim-3 obtained a job, RAMOS's attitude towards Victim-3 changed. RAMOS told Victim-3, in substance and in part, that RAMOS had brought Victim-3 to the United States so that, among other things, RAMOS could have sex with Victim-3 whenever he wanted. Thereafter, RAMOS raped Victim-3 at least approximately two times by forcing Victim-3 to have sex, including anal and vaginal intercourse.

STATUTORY ALLEGATIONS

26. The allegations contained in paragraphs 1 through 25 of this Indictment are repeated and realleged as if set forth fully herein.

27. From at least in or about 2015 through in or about 2016, in the Southern District of New York and elsewhere, JORGE ALBERTO RAMOS, the defendant, knowingly persuaded, induced, enticed, and coerced an individual to travel in interstate and foreign commerce to engage in sexual activity for which a person can be charged with a criminal offense, and attempted, aided and abetted, and willfully caused the same, to wit, RAMOS induced and enticed Victim-1 to travel from El Salvador to the Bronx, New York, so RAMOS could engage and attempt to engage in unlawful sexual activity with Victim-1, in violation of New York Penal Law Sections 130.35, 130.50, 130.65, 130.25, 130.40, 130.55, and 130.52.

(Title 18, United States Code, Sections 2422(a) and 2.)

COUNT TWO **(Inducement to Travel to Engage in Unlawful Sexual Activity)** **(Victim-2)**

The Grand Jury further charges:

28. The allegations contained in paragraphs 1 through 25 of this Indictment are repeated and realleged as if set forth fully herein.

29. From at least in or about 2016 through at least in or about 2017, in the Southern District of New York and elsewhere, JORGE ALBERTO RAMOS, the defendant, knowingly persuaded, induced, enticed, and coerced an individual to travel in interstate and foreign commerce to engage in sexual activity for which a person can be charged with a criminal offense, and attempted, aided and abetted, and willfully caused the same, to wit, RAMOS induced and enticed Victim-2 to travel from El Salvador to the Bronx, New York, so RAMOS could engage and attempt to engage in unlawful sexual activity with Victim-2, in violation of New York Penal Law Sections 130.35, 130.50, 130.65, 130.25, 130.40, 130.55, and 130.52.

(Title 18, United States Code, Sections 2422(a) and 2.)

COUNT THREE
(Transportation to Engage in Unlawful Sexual Activity)
(Victim-1)

The Grand Jury further charges:

30. The allegations contained in paragraphs 1 through 25 of this Indictment are repeated and realleged as if set forth fully herein.

31. From at least in or about 2015 through at least in or about 2016, in the Southern District of New York and elsewhere, JORGE ALBERTO RAMOS, the defendant, knowingly transported an individual in interstate and foreign commerce with intent that the individual engage in sexual activity for which a person can be charged with a criminal offense, and attempted, aided and abetted, and willfully caused the same, to wit, RAMOS transported Victim-1 from El Salvador to the Bronx, New York, so RAMOS could engage and attempt to engage in unlawful sexual activity with Victim-1, in violation of New York Penal Law Sections 130.35, 130.50, 130.65, 130.25, 130.40, 130.55, and 130.52.

(Title 18, United States Code, Sections 2421(a) and 2.)

COUNT FOUR
(Transportation to Engage in Unlawful Sexual Activity)
(Victim-2)

The Grand Jury further charges:

32. The allegations contained in paragraphs 1 through 25 of this Indictment are repeated and realleged as if set forth fully herein.

33. From at least in or about 2016, up to and including in or about 2017, in the Southern District of New York and elsewhere, JORGE ALBERTO RAMOS, the defendant, knowingly transported an individual in interstate and foreign commerce, with intent that the individual engage in sexual activity for which a person can be charged with a criminal offense, and attempted, aided and abetted, and willfully caused the same, to wit, RAMOS transported Victim-2 from El Salvador to the Bronx, New York, so RAMOS could engage and attempt to engage in unlawful sexual activity with Victim-2, in violation of New York Penal Law Sections 130.35, 130.50, 130.65, 130.25, 130.40, 130.55, and 130.52.

(Title 18, United States Code, Sections 2421(a) and 2.)

COUNT FIVE
(Conspiracy to Engage in Human Smuggling)
(Victim-3)

The Grand Jury further charges:

34. The allegations contained in paragraphs 1 through 25 of this Indictment are repeated and realleged as if set forth fully herein.

35. From at least in or about August 2013 through at least in or about 2014, in the Southern District of New York and elsewhere, JORGE ALBERTO RAMOS, the defendant, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the human-smuggling laws of the United States.

36. It was a part and an object of the conspiracy that JORGE ALBERTO RAMOS, the defendant, and others known and unknown, would and did bring to the United States a person at a place other than a designated port of entry and place other than as designated by the Secretary of Homeland Security, knowing that such person was an alien, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(i), to wit, RAMOS facilitated and paid money for Victim-3 to be unlawfully smuggled from El Salvador into the United States.

(Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).)

COUNT SIX
(Human Smuggling)
(Victim-3)

The Grand Jury further charges:

37. The allegations contained in paragraphs 1 through 25 of this Indictment are repeated and realleged as if set forth fully herein.

38. From at least in or about August 2013 through at least in or about 2014, in the Southern District of New York and elsewhere, JORGE ALBERTO RAMOS, the defendant, knowing that a person was an alien, brought and attempted to bring to the United States such person at a place other than a designated port of entry and place other than as designated by the Secretary of Homeland Security, and aided and abetted the same, to wit, RAMOS facilitated and paid money for Victim-3 to be smuggled from El Salvador into the United States.

(Title 8, United States Code, Sections 1324(a)(1)(A)(i) and 1324(a)(1)(A)(v)(II).)

COUNT SEVEN
(Harboring an Alien)
(Victim-3)

The Grand Jury further charges:

39. The allegations contained in paragraphs 1 through 25 of this Indictment are repeated and realleged as if set forth fully herein.

40. From at least in or about August 2013 through at least in or about 2014, in the Southern District of New York and elsewhere, JORGE ALBERTO RAMOS, the defendant, knowing and in reckless disregard of the fact that an alien has come to, entered, and remained in the United States in violation of law, concealed, harbored, and shielded from detection, and attempted to conceal, harbor, and shield from detection, such alien in a place, including a building and means of transportation, and aided and abetted the same, to wit, RAMOS directed Victim-3 to remain in the Ramos Residence in or about 2013 and 2014 to avoid detection by immigration officials, knowing that Victim-3 had been smuggled from El Salvador into the United States.

(Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(A)(v)(II).)

FORFEITURE ALLEGATIONS

41. As a result of committing the offenses alleged in Counts One through Four of this Indictment, JORGE ALBERTO RAMOS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428, any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offenses; and any and all property, real or personal, that was used or intended to be used to commit or facilitation the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of property involved in said offenses and proceeds traceable to the commission of said offenses.

Substitute Asset Provision


42. If any of the above-described forfeitable property, 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 person;
- (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 which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 2428;
Title 21, United States Code, Section 853;
and Title 28, United States Code, Section 2461.)




DAMIAN WILLIAMS
United States Attorney