

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SANDY CARAZAS-PINEZ,

Defendant.

SEALED INDICTMENT

23 Cr. ___

COUNT ONE

(Enticement of Minor Victim-1 to Engage in Illegal Sexual Activity)

The Grand Jury charges:

OVERVIEW

1. At all times relevant to this Indictment, SANDY CARAZAS-PINEZ, the defendant, was a high school teacher at a school for kindergarten through twelfth grade students, located in Yonkers, New York (“School-1”). From in or about January 2022 through in or about March 2023, Minor Victim-1 was a student in one of CARAZAS-PINEZ’s classes at School-1.

2. From in or about November 2022 through in or about February 2023, SANDY CARAZAS-PINEZ, the defendant, abused her position as a teacher at School-1 by inducing and attempting to induce Minor Victim-1 to engage in a sexual relationship with her and to create and transmit sexually explicit visual depictions of Minor Victim-1 to her. During that time period, Minor Victim-1 was sixteen years old.

3. SANDY CARAZAS-PINEZ, the defendant, singled out Minor Victim-1 for personal attention at School-1 and began frequently exchanging text messages with Minor Victim-1 that became increasingly sexual in nature. In addition to providing Minor Victim-1 with special attention, CARAZAS-PINEZ induced Minor Victim-1 to engage in sexual activity with her by leading Minor Victim-1 to believe that they were in a romantic relationship.

4. SANDY CARAZAS-PINEZ, the defendant, used her personal cellphone to call, text, and video call Minor Victim-1's cellphone to maintain her "relationship" with Minor Victim-1, to arrange sexual encounters, and to repeatedly induce Minor Victim-1 to engage in live-streamed sexually explicit conduct while on video calls with CARAZAS-PINEZ. In text messages with Minor Victim-1, CARAZAS-PINEZ referred to her sexual encounters with Minor Victim-1 and the live depictions of sexually explicit conduct she induced Minor Victim-1 to create as "gifts."

5. SANDY CARAZAS-PINEZ, the defendant, also used her personal cellphone to send Minor Victim-1 sexually suggestive photographs of herself along with sexually explicit text messages. After sending the photographs and messages, CARAZAS-PINEZ instructed Minor Victim-1 to delete them and inquired repeatedly as to whether Minor Victim-1 had done so.

6. On multiple occasions while working on the premises of School-1, SANDY CARAZAS-PINEZ, the defendant, inappropriately touched Minor Victim-1 and induced Minor Victim-1 to touch her, including touching her genital area over her clothing. CARAZAS-PINEZ subsequently began asking Minor Victim-1 to meet with her outside the premises of School-1 to engage in sexual activity.

7. To facilitate their sexual encounters outside the premises of School-1, SANDY CARAZAS-PINEZ, the defendant, directed Minor Victim-1 in text messages to obtain day passes from School-1 to be permitted to leave campus. CARAZAS-PINEZ then met Minor Victim-1 at a location near School-1's campus and drove Minor Victim-1 to another location. On multiple occasions, while parked in CARAZAS-PINEZ's car at various locations, including in or around the Bronx, Yonkers, and Staten Island, New York, CARAZAS-PINEZ engaged in sexual intercourse and other sexual acts, and attempted to do so, with Minor Victim-1.

8. On multiple occasions, after Minor Victim-1 expressed a desire to end their sexual

relationship, SANDY CARAZAS-PINEZ, the defendant, coerced Minor Victim-1 to continue their sexual relationship by, among other things, threatening to remove school privileges from Minor Victim-1 if Minor Victim-1 refused to continue engaging in the requested sexual activity.

9. SANDY CARAZAS-PINEZ, the defendant, continued her sexual relationship with Minor Victim-1 and concealed it from School-1 until in or about February 2023, when officials at School-1 learned that CARAZAS-PINEZ was seen off-campus with Minor Victim-1 in her car and had been observed in close contact with Minor Victim-1 in her classroom. CARAZAS-PINEZ was subsequently terminated by School-1.

10. In or about March 2023, SANDY CARAZAS-PINEZ, the defendant, informed Minor Victim-1 during a recorded phone call that she had been terminated. Minor Victim-1 asked CARAZAS-PINEZ, in sum and substance, whether they were observed having sex in CARAZAS-PINEZ's car. CARAZAS-PINEZ did not deny the sexual encounter but informed Minor Victim-1 that they had only been observed entering her car. Subsequently, in or about March 2023, CARAZAS-PINEZ sent text messages to Minor Victim-1 from a new phone number and instructed Minor Victim-1 to delete the messages.

STATUTORY ALLEGATIONS

11. From at least in or about November 2022 through at least in or about February 2023, in the Southern District of New York and elsewhere, SANDY CARAZAS-PINEZ, the defendant, knowingly, using a facility and means of interstate and foreign commerce, persuaded, induced, enticed, and coerced an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be charged with a criminal offense, and attempted to do the same, to wit, on numerous occasions CARAZAS-PINEZ used a cellphone and the Internet to persuade, induce, entice, and coerce Minor Victim-1, who was 16 years old at the time, to engage

in unlawful sexual activity with CARAZAS-PINEZ, in violation of New York Penal Law Sections 130.25, 130.40, and 130.55.

(Title 18, United States Code, Section 2422(b).)

COUNT TWO
(Production of Child Pornography)

The Grand Jury further charges:

12. The allegations contained in paragraphs 1 through 10 of this Indictment are repeated and realleged as if fully set forth within.

13. From at least in or about December 2022 through at least in or about February 2023, in the Southern District of New York and elsewhere, SANDY CARAZAS-PINEZ, the defendant, knowingly employed, used, persuaded, induced, enticed, and coerced 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, and the defendant knew and had reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce and mailed, and the visual depiction was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and such visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, CARAZAS-PINEZ induced Minor Victim-1, who was 16 years old at the time, to engage in sexually explicit activity during live-streamed video calls with CARAZAS-PINEZ, while Minor Victim-1 was in Yonkers, New York.

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

FORFEITURE ALLEGATIONS

14. As a result of committing the offense alleged in Count One of this Indictment, SANDY CARAZAS-PINEZ, 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 offense; and any and all property, real or personal, that was used or intended to be used to commit or facilitation the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

15. As a result of committing the offense alleged in Count Two of this Indictment, SANDY CARAZAS-PINEZ, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from said offense; and any and all property, real or personal, used or intended to be used to commit or promote the commission of said offense, or traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

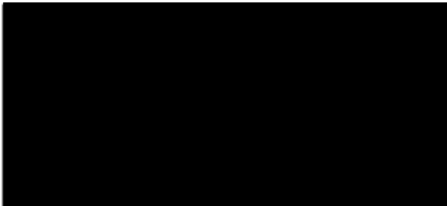
16. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- 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 Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 2428 and 2253;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



Damian Williams
DAMIAN WILLIAMS
United States Attorney