

COUNT TWO

Engaging in Illicit Sexual Conduct in Foreign Places
(18 U.S.C. §§ 2423(c) and (e); 3238)

The Grand Jury further charges:

On various dates between in or about May 2018 and on or about March 10, 2020, the defendant,

MICHAEL SEBASTIAN,

a citizen of the United States who was thereafter found present and arrested in the District of Massachusetts, did travel in foreign commerce and reside, temporarily and permanently, in Laos, and engaged in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f)(2), with another person, Minor B (YOB 2002), and attempted to do so.

All in violation of Title 18, United States Code, Sections 2423(c) and (e); 3238.

COUNT THREE

Engaging in Illicit Sexual Conduct in Foreign Places
(18 U.S.C. §§ 2423(c) and (e); 3238)

The Grand Jury further charges:

On various dates between in or about May 2018 and September 2019, the defendant,

MICHAEL SEBASTIAN,

a citizen of the United States who was thereafter found present and arrested in the District of Massachusetts, did travel in foreign commerce and reside, temporarily and permanently, in Laos, and engaged in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f)(2), with another person, Minor C (YOB 2001), and attempted to do so.

All in violation of Title 18, United States Code, Sections 2423(c) and (e); 3238.

COUNT FOUR

Sex Trafficking of Children

(18 U.S.C. §§ 1591(a)(1), (b)(1) and (b)(2); 1596(a)(1) and (2); 3238)

The Grand Jury further charges:

On various dates between in or about May 2018 and September 2018, in Laos and elsewhere, the defendant,

MICHAEL SEBASTIAN,

a national of the United States who was thereafter found present and arrested in the District of Massachusetts, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, Minor A (YOB 2005), a person who had not yet attained 14 years of age, having had a reasonable opportunity to observe Minor A and knowing and in reckless disregard of the fact that Minor A had not attained the age of 18 years and would be caused to engage in a commercial sex act, and attempted to do so.

All in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1), and (b)(2). and (c); 1596(a)(1) and (2); 3238.

COUNT FIVE

Sex Trafficking of Children

(18 U.S.C. §§ 1591(a)(1) and (b)(2), and (c); 1596(a)(1) and (2); 3238)

The Grand Jury further charges:

On various dates between in or about May 2018 and on or about March 10, 2020, in Laos and elsewhere, the defendant,

MICHAEL SEBASTIAN,

a national of the United States who was thereafter found present and arrested in the District of Massachusetts, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, Minor B (YOB 2002), a person who had not attained 18 years of age, having had a reasonable opportunity to observe Minor B and knowing and in reckless disregard of the fact that Minor B had not attained the age of 18 years and would be caused to engage in a commercial sex act, and attempted to do so.

All in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c); 1596(a)(1) and (2); 3238.

COUNT SIX
Sex Trafficking of Children
(18 U.S.C. §§ 1591(a)(1) and (b)(2); 1596(a)(1) and (2); 3238)

The Grand Jury further charges:

On various dates between in or about May 2018 and September 2019, in Laos and elsewhere, the defendant,

MICHAEL SEBASTIAN,

a national of the United States who was thereafter found present and arrested in the District of Massachusetts, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, Minor C (YOB 2001), a person who had not yet attained 18 years of age, having had a reasonable opportunity to observe Minor C and knowing and in reckless disregard of the fact that Minor C had not attained the age of 18 years and would be caused to engage in a commercial sex act, and attempted to do so.

All in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c); 1596(a)(1) and (2); 3238.

FORFEITURE ALLEGATION
(U.S.C. §§ 2428 and 1594)

1. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 2423(c) and (e), set forth in Counts One through Three, the defendant,

MICHAEL SEBASTIAN,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2428, any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense, and any property, real or personal, constituting or derived from any proceeds obtained, directly, or indirectly, as a result of the offense.

2. Upon conviction of one or more offenses in violation of Title 18, United States Code, Section 1591, set forth in Counts Four through Six, the defendant

MICHAEL SEBASTIAN,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 1594, any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offense, and any property traceable to such property, and any property, real or personal, constituting or derived from proceeds traceable to the offense.

3. If any of the property described in Paragraphs 1 and 2, above, as being forfeitable pursuant to Title 18, United States Code, Sections 2428 and 1594, 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 party;
- 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 divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraphs 1 and 2 above.

All pursuant to Title 18, United States Code, Sections 2428 and 1594, and Title 28, United States Code, Section 2461(c).

A TRUE BILL



FOREPERSON

A handwritten signature in cursive script, appearing to read 'AP' followed by a flourish.

ANNE PARUTI
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: AUGUST 27, 2020
Returned into the District Court by the Grand Jurors and filed.

/s/ Thomas F. Quinn 8/27/20 @ 4:35pm
DEPUTY CLERK