

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
RAMY AHMED	:	VIOLATIONS:
	:	18 U.S.C. § 2422(b) (coercion and enticement - 1 count)
	:	18 U.S.C. § 2252(a)(2) (distribution of child pornography - 1 count)
	:	18 U.S.C. § 2252(a)(4)(B) (possession of child pornography - 1 count)
	:	18 U.S.C. § 2252(a)(1) (transportation of child pornography) (1 count)
	:	18 U.S.C. § 2423(b) (travel with intent to engage in illicit sexual conduct - 1 count)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At some time before February 5, 2013, defendant RAMY AHMED posted an advertisement seeking fathers willing to engage in incest with their children on the Internet website www.Craigslist.org.
2. Between on or about February 6, 2012, and on or about April 2, 2013, defendant RAMY AHMED engaged in continuous and ongoing online conversations with an undercover agent, who was posing as the father of an eight year old girl, wherein defendant RAMY AHMED expressed his interest in sexually exploiting the child, identified sex acts that he wished to perform on the child, and suggested courses of action to assist the child in becoming comfortable with engaging in sex acts with adults, including the following statements listed below:

Date

Statement

February 8, 2013

Defendant AHMED asked if he could “play” with the undercover agent’s daughter

February 12, 2013

Defendant AHMED wrote that he wanted to perform oral sex on the undercover agent’s daughter and was willing to travel to do that.

February 26, 2013

Defendant AHMED wrote that he wanted time alone with the undercover agent’s daughter and would try to have the daughter perform oral sex on the undercover agent.

3. On or about February 28, 2013, defendant RAMY AHMED distributed images of minors engaging in sexually explicit conduct to the undercover agent.

4. On or about April 2, 2013, defendant RAMY AHMED drove from Allentown, Pennsylvania to Cherry Hill, New Jersey to meet the undercover agent for the purpose of engaging in sexual activity with the undercover agent’s daughter.

5. From on or about February 6, 2013, to on or about April 2, 2013, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

RAMY AHMED

used facilities and means of interstate commerce, that is, the Internet, to persuade, induce, entice, and coerce, an individual who had not yet attained the age of 18 years to engage in sexual activity for which a person could be charged with a criminal offense, and attempted to do so.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 28, 2013, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

RAMY AHMED

knowingly distributed visual depictions that had been shipped and transported in and affecting interstate and foreign commerce, which visual depictions showed minors engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors engaged in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(2).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 2, 2013, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

RAMY AHMED

knowingly possessed one or more films, video tapes, and other matter, that is a thumb drive, which contained approximately 15 still images and 30 video images that had been mailed, shipped and transported in interstate and foreign commerce. The production of these visual depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of minors engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 2, 2013, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

RAMY AHMED

knowingly transported in interstate commerce a thumb drive containing visual depictions, showing minors engaged in sexually explicit conduct and the producing of those visual depictions involved the use of minors engaged in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(1).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 2, 2013, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

RAMY AHMED

traveled and attempted to travel from Allentown, Pennsylvania to Cherry Hill, New Jersey for the purpose of engaging in illicit sexual conduct with the undercover agent's eight year old daughter.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 2252(a)(1), 2252(a)(2), 2252(a)(4)(B), 2422(b), and 2423(b),(e) set forth in this indictment, defendant

RAMY AHMED

shall forfeit to the United States of America any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 18, United States Code, Sections 2252(a)(1), 2252(a)(2), 2252(a)(4)(B); and any property, real or personal, used or intended to be used to commit or to promote the commission of the violations of Title 18, United States Code, Sections 2422(b), and 2423(b),(e), as charged in this indictment, including, but not limited to:

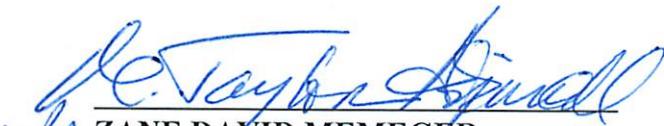
1. One Apple iPhone
2. One Apple iPad 16 GB with charger
3. One Attache thumb drive 256M
4. One Acura thumb drive 16 GB
5. Thirteen CD/DVDs
6. One Staples Relay thumb drive
7. One Coolpix Digital Camera
8. One Google tablet
9. One Hitachi hard drive

10. One Toshiba laptop
11. One SD card
12. One LG cell phone
13. One external hard drive
14. Three thumb drives
15. Two CD/DVDs Rom

All pursuant to Title 18, United States Code, Sections 2253 and 2428.

A TRUE BILL:

GRAND JURY FOREPERSON


ZANE DAVID MEMEGER
UNITED STATES ATTORNEY