

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.
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CAROL L. MICHEL
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

**SEALED
FELONY**

**INDICTMENT FOR SEXUAL EXPLOITATION OF CHILDREN,
INTERSTATE COMMUNICATIONS WITH INTENT TO EXTORT,
AND POSSESSION OF CHILD SEXUAL ABUSE MATERIAL**

UNITED STATES OF AMERICA

*

CRIMINAL NO. **22-36**

v.

*

SECTION:

SECT. D MAG. 4

BIAGIO WILLIAM AMBROSINO

*

VIOLATIONS: 18 U.S.C. § 875(b)

18 U.S.C. § 875(d)

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18 U.S.C. § 2251(a)

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18 U.S.C. § 2252(a)(4)(B)

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18 U.S.C. § 2253

* * *

The Grand Jury charges that:

COUNT 1
(Sexual Exploitation of Children)

Beginning at a time unknown, but not later than in or about August 2020, and continuing until at least on or about November 14, 2021, in the Eastern District of Louisiana, and elsewhere, the defendant, **BIAGIO WILLIAM AMBROSINO**, did knowingly employ, use, persuade, induce, entice, and coerce, and attempt to employ, use, persuade, induce, entice, and coerce, a minor, namely Victim 1, a female born in August 2004, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to

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know that such visual depiction would be transported and transmitted using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and using materials that have been mailed, shipped, and transported in an affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 2
(Sexual Exploitation of Children)

On or about November 28, 2021, in the Eastern District of Louisiana, and elsewhere, the defendant, **BIAGIO WILLIAM AMBROSINO**, did knowingly employ, use, persuade, induce, entice, and coerce, and attempt to employ, use, persuade, induce, entice, and coerce, a minor, namely Victim 2, a male born in August 2005, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and using materials that have been mailed, shipped, and transported in an affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 3
(Interstate Communications With Intent to Extort)

Beginning at a time unknown, but not later than on or about November 14, 2021, and continuing until on or about November 30, 2021, in the Eastern District of Louisiana, and elsewhere, the defendant, **BIAGIO WILLIAM AMBROSINO**, knowingly and with intent to extort a thing of value, namely sexually explicit visual depictions, from Victim 3, a female born in December 2004, did transmit in interstate and foreign commerce from Belle Chasse, Louisiana, to

the State of New York, a communication via text message and messages sent via social media applications to Victim 3, and the communication contained a threat to injure the person of another, to wit: while pretending to be someone else, **AMBROSINO** threatened to injure **AMBROSINO** if Victim 3 refused to transmit sexually explicit depictions of herself, in violation of Title 18, United States Code, Section 875(b).

COUNT 4

(Interstate Communications With Intent to Extort)

Beginning at a time unknown, but not later than about June 2021, and continuing until on or about December 29, 2021, in the Eastern District of Louisiana and elsewhere, the defendant, **BIAGIO WILLIAM AMBROSINO**, knowingly and with intent to extort a thing of value, namely sexually explicit visual depictions, from Victim 4, an adult female, did transmit in interstate and foreign commerce from Belle Chasse, Louisiana, and elsewhere, to the State of Maryland, a communication, to wit: text messages and messages sent via social media, to Victim 4, and the communication contained a threat to injure the property and reputation of Victim 4, specifically, threats to expose Victim 4 by transmitting to individuals, including family members of Victim 4, previously obtained sexually explicit depictions of Victim 4, in violation of Title 18, United States Code, Section 875(d).

COUNT 5

(Possession of Child Sexual Abuse Material)

Beginning at a time unknown, but not later than on or about December 5, 2020, and continuing until on or about January 19, 2022, within the Eastern District of Louisiana, the defendant, **BIAGIO WILLIAM AMBROSINO**, did knowingly possess and attempt to possess one or more matters containing visual depictions that had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and

foreign commerce, and which visual depictions were produced using materials which had been mailed and so shipped and transported, by any means, including by computer; and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such visual depictions were of such conduct, to wit: digital videos and images depicting prepubescent minors and minors who had not attained twelve (12) years of age engaged in sexually explicit conduct, in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 5 of this indictment are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offenses alleged in Counts 1, 2 and 5, the defendant, **BIAGIO AMBROSINO**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253, any visual depiction as defined above; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from said offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of said offenses, and any property traceable to such property.

3. As a result of the offenses alleged in Counts 3 through 4, the defendant, **BIAGIO AMBROSINO**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any property constituting or derived from any proceeds obtained directly or indirectly as the result of said offenses, and any property used or intended to be used in any manner or part to commit or to facilitate the commission of said offenses.

4. If any of the above-described 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;

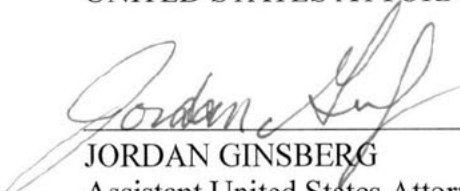
The United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

A TRUE BILL:



FOREPERSON

DUANE A. EVANS
UNITED STATES ATTORNEY


JORDAN GINSBERG
Assistant United States Attorney
Illinois Bar No. 6282956

New Orleans, Louisiana
February 25, 2022