

EDP:MS  
F. #2021R00438

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

MANUEL MORETTI,

Defendant.

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C., §§ 2422(a), 2422(b),  
2423(a), 2428(a) and 3551 et seq.; T. 21,  
U.S.C., § 853(p))

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THE GRAND JURY CHARGES:

COUNT ONE

(Transportation of a Minor)

1. On or about January 7, 2021, within the Eastern District of New York and elsewhere, the defendant MANUEL MORETTI did knowingly and intentionally transport an individual who had not attained the age of 18 years, to wit: John Doe, a minor individual whose identity is known to the Grand Jury, in interstate commerce, with the intent that John Doe engage in sexual activity for which a person could be charged with a criminal offense, to wit: oral and anal sex.

(Title 18, United States Code, Sections 2423(a) and 3551 et seq.)

COUNT TWO

(Transportation of a Minor)

2. On or about February 7, 2021, within the Eastern District of New York and elsewhere, the defendant MANUEL MORETTI did knowingly and intentionally transport an individual who had not attained the age of 18 years, to wit: John Doe, in interstate commerce,

with the intent that John Doe engage in sexual activity for which a person could be charged with a criminal offense, to wit: oral and anal sex.

(Title 18, United States Code, Sections 2423(a) and 3551 et seq.)

COUNT THREE  
(Transportation of a Minor)

3. On or about February 21, 2021, within the Eastern District of New York and elsewhere, the defendant MANUEL MORETTI did knowingly and intentionally transport an individual who had not attained the age of 18 years, to wit: John Doe, in interstate commerce, with the intent that John Doe engage in sexual activity for which a person could be charged with a criminal offense, to wit: oral and anal sex.

(Title 18, United States Code, Sections 2423(a) and 3551 et seq.)

COUNT FOUR  
(Transportation of a Minor)

4. On or about April 17, 2021, within the Eastern District of New York and elsewhere, the defendant MANUEL MORETTI did knowingly and intentionally transport an individual who had not attained the age of 18 years, to wit: John Doe, in interstate commerce, with the intent that John Doe engage in sexual activity for which a person could be charged with a criminal offense, to wit: oral and anal sex.

(Title 18, United States Code, Sections 2423(a) and 3551 et seq.)

COUNT FIVE  
(Interstate Coercion and Enticement of a Minor)

5. In or about and between January 2021 and December 2021, within the Eastern District of New York and elsewhere, the defendant MANUEL MORETTI did knowingly and intentionally persuade, induce, entice and coerce an individual, to wit: John Doe, to travel in

interstate commerce, to engage in sexual activity for which a person could be charged with a criminal offense, to wit: oral and anal sex.

(Title 18, United States Code, Sections 2422(a) and 3551 et seq.)

#### COUNT SIX

(Attempted Interstate Coercion and Enticement of a Minor)

6. In or about December 2021, within the Eastern District of New York and elsewhere, the defendant MANUEL MORETTI, using one or more facilities and means of interstate and foreign commerce, to wit: the Internet and mobile Internet applications, did knowingly and intentionally attempt to persuade, induce, entice and coerce an individual who had not attained the age of 18 years, to wit: John Doe, to engage in sexual activity for which a person could be charged with a criminal offense, to wit: oral and anal sex.

(Title 18, United States Code, Sections 2422(b) and 3551 et seq.)

#### CRIMINAL FORFEITURE ALLEGATION

7. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2428(a), which requires the forfeiture of (a) any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offenses; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

8. 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 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 intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2428(a); Title 21, United States Code, Section 853(p))

A TRUE BILL

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BREON PEACE /  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

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FOREPERSON