

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

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
NATHANIEL RODRIGUEZ	:	VIOLATIONS:
	:	18 U.S.C. § 1201 (kidnapping - 2 counts)
	:	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about November 6, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendant

NATHANIEL RODRIGUEZ

knowingly, willfully, and unlawfully seized, confined, kidnapped, abducted, carried away, and held, K.J., a person known to the grand jury, for ransom, reward, and otherwise, that is, for the purpose of forcing K.J. to obtain money from an automated teller machine, and, in committing the offense, used K.J.'s Mastercard debit card, a means, facility, and instrumentality of interstate commerce.

In violation of Title 18, United States Code, Section 1201(a)(1).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 11, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendant

NATHANIEL RODRIGUEZ

knowingly, willfully, and unlawfully seized, confined, kidnapped, abducted, carried away, and held, P.M.N.L., a person known to the grand jury, for ransom, reward, and otherwise, that is, for the purpose of forcing P.M.N.L. to obtain money from automated teller machines and merchants and, in committing the offense, used P.M.N.L.'s Citizen's Bank Visa debit card and Capital One Visa credit, a means, facility, and instrumentality of interstate commerce.

In violation of Title 18, United States Code, Section 1201(a)(1).

A TRUE BILL:

FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**