

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DAVID KAUFMAN,

Defendant

) Criminal No.
)
) Violations:
)
) Counts One and Two: Knowingly Persuading an
) Individual to Travel in Interstate Commerce to
) Engage in Prostitution; Aiding and Abetting
) (18 U.S.C. § 2422(a); 18 U.S.C. § 2)
)
) Forfeiture Allegation:
) (18 U.S.C. § § 2428(a))
)

INDICTMENT

COUNT ONE

Knowingly Persuading an Individual to Travel in Interstate Commerce to Engage in Prostitution;
Aiding and Abetting
(18 U.S.C. § 2422(a); 18 U.S.C. § 2)

The Grand Jury charges:

1. In or around February 2024, in the District of Massachusetts and elsewhere, the
defendant,

DAVID KAUFMAN,

did knowingly persuade, induce, entice and coerce any individual, that is, Victim 1, to travel in
interstate and foreign commerce to engage in prostitution and any sexual activity for which any
person can be charged with a criminal offense.

All in violation of Title 18, United State Code, Sections 2422(a) and 2.

COUNT TWO

Knowingly Persuading an Individual to Travel in Interstate Commerce to Engage in Prostitution;
Aiding and Abetting
(18 U.S.C. § 2422(a); 18 U.S.C. § 2)

The Grand Jury charges:

2. In or around March 2024, in the District of Massachusetts and elsewhere, the defendant,

DAVID KAUFMAN,

did knowingly persuade, induce, entice and coerce any individual, that is, Victim 1, to travel in interstate and foreign commerce to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United State Code, Sections 2422(a) and 2.

FORFEITURE ALLEGATION
(18 U.S.C. § 2428(a))

The Grand Jury further finds:

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 2422(a), set forth in Counts One and Two, the defendant,

DAVID KAUFMAN,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2428(a), any property, real or personal, used or intended to be used to commit or to facilitate the commission of such offenses, or any property, real or personal, that constitutes or is derived from proceeds obtained, directly or indirectly, as a result of such offenses. The property to be forfeited includes, but is not limited to, the following:

- a. the real property located at [REDACTED], Baltimore, MD 21202-4835, more particularly described in the Condominium Deed, recorded at the Baltimore City Circuit Court (Land Records), at Book 25222, Pages 222-231, dated July 19, 2022, and recorded on October 26, 2022; and
- b. a 2018 Mercedes-Benz S, with Vehicle Identification Number [REDACTED].

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2428(a), 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;

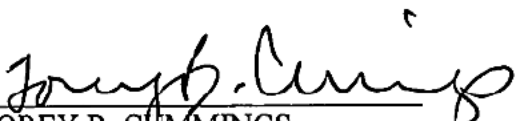
it is the intention of the United States of America, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2428(a).

A TRUE BILL



FOREPERSON


TOREY B. CUMMINGS
CRAIG ESTES
ASSISTANT UNITED STATES ATTORNEYS
DISTRICT OF MASSACHUSETTS

District of Massachusetts,
Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK

JS 45 (5/97) - (Revised U.S.D.C. MA 9/20/2023)

Criminal Case Cover Sheet**U.S. District Court - District of Massachusetts**Place of Offense: MA Category No. II Investigating Agency FBI

City _____

County Hampden**Related Case Information:**

Superseding Ind./ Inf. _____ Case No. _____

Same Defendant _____ New Defendant _____

Magistrate Judge Case Number _____

Search Warrant Case Number 24-8605-PGL, 24-8617-PGL, 24-8633-8634-PGL, 25-8190-PGL

R 20/R 40 from District of _____

Defendant Information:Is this case related to an existing criminal action pursuant to Rule 40.1(h)? If yes, case number _____ ☐ Yes ☒ NoDefendant Name David KaufmanJuvenile: ☐ Yes ☒ NoIs this person an attorney and/or a member of any state/federal bar: ☐ Yes ☒ No

Alias Name: _____

Address: [REDACTED], Four Seasons Residences, Baltimore, Maryland 21202Birth date (Yr only): 1981 SSN (last 4#): 1901 Sex: M Race White Nationality: US Citizen

Defense Counsel if known: _____ Address: _____

Bar Number: _____

U.S. Attorney InformationAUSA: Torey B. Cummings and Craig Estes Bar Number if applicable: _____Interpreter: ☐ Yes ☒ No List language and/or dialect: _____Victims: ☒ Yes ☐ No If yes, are there multiple crime victims under 18 USC§3771(d)(2) ☐ Yes ☒ NoMatter to be SEALED: ☐ Yes ☐ No☒ Warrant Requested ☐ Regular Process ☐ In Custody

Location Status: _____

Arrest Date: _____

☐ Already in Federal Custody as of _____ in _____☐ Already in State Custody at _____ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by: _____ on _____Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 2

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 4/15/2025Signature of AUSA: Torey B. Cummings

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant _____

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	18 U.S.C. § 2422(a); 18 U.S.C. § 2	Knowingly Persuading an Individual to Travel in Interstate Commerce to Engage in Prostitution; Aiding and Abetting	1, 2
Set 2	18 U.S.C. §§ 2428(a))	Forfeiture Allegation	
Set 3			
Set 4			
Set 5			
Set 6			
Set 7			
Set 8			
Set 9			
Set 10			
Set 11			
Set 12			
Set 13			
Set 14			
Set 15			

ADDITIONAL INFORMATION: