

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DAVID KAUFMAN and
DARREN ZALDIVAR,

Defendants

) Criminal No. 25-cr-30025-MGM-KAR
)
) Violations:
)
) Count One: Persuading an Individual to Travel to
) Engage in Prostitution; Aiding and Abetting
) (18 U.S.C. §§ 2422(a) and 2)
)
) Count Two: Transporting an Individual with
) Intent the Individual Engage in Prostitution
) (18 U.S.C. § 2421)
)
) Count Three: Conspiracy to Engage in Sex
) Trafficking of a Minor
) (18 U.S.C. § 1594)
)
) Count Four: Sex Trafficking of a Minor
) (18 U.S.C. § 1591(a)(1) and (b)(2))
)
) Transportation for Prostitution Forfeiture
) Allegation:
) (18 U.S.C. § 2428(a))
)
) Sex Trafficking of a Minor Forfeiture Allegation:
) (18 U.S.C. § 1594(d))
)

SUPERSEDING INDICTMENT

COUNT ONE

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

The Grand Jury charges:

From in or about February 2024 through in or about 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 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

Transporting an Individual with Intent the Individual Engage in Prostitution
(18 U.S.C. § 2421)

The Grand Jury further charges:

In or about March 2024, in the District of Massachusetts and elsewhere, the defendant,

DARREN ZALDIVAR,

did knowingly transport any individual – that is, Victim 1 – in interstate commerce, with intent that such individual engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United State Code, Section 2421.

COUNT THREE

Conspiracy to Engage in Sex Trafficking of a Minor
(18 U.S.C. § 1594(c))

The Grand Jury further charges:

From in or about May 2024 through in or about June 2024, in the District of Massachusetts and elsewhere, the defendants,

DAVID KAUFMAN and DARREN ZALDIVAR,

did conspire with each other, in or affecting interstate commerce, to knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means, a person – that is, Minor Victim A – who had not attained the age of 18, having had a reasonable opportunity to observe Minor Victim A and knowing and in reckless disregard that Minor Victim A was under the age of 18 years old, and knowing he would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1594(c).

COUNT FOUR
Sex Trafficking of a Minor
(18 U.S.C. § 1591(a)(1) and (b)(2))

The Grand Jury further charges:

From in or about May 2024 through in or about June 2024, in the District of Massachusetts and elsewhere, the defendant,

DAVID KAUFMAN,

did, in or affecting interstate commerce, knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means, a person – that is, Minor Victim A – who had not attained the age of 18, having had a reasonable opportunity to observe Minor Victim A and knowing and in reckless disregard that Minor Victim A was under the age of 18 years old, and knowing he would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(2).

TRANSPORTATION FOR PROSTITUTION 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, Sections 2422(a) and 2421, set forth in Counts One and Two, the defendants,

DAVID KAUFMAN and
DARREN ZALDIVAR,

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 300 International Drive, Unit 2001, 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 WDDUG8JB4JA373846.

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 defendants --

- 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 defendants up to the value of the property described in Paragraph 1 above.

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

SEX TRAFFICKING OF A MINOR FORFEITURE ALLEGATION
(18 U.S.C. § 1594(d))

The Grand Jury further finds:

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Sections 1594 and 1591(a)(1) and (b)(2), set forth in Counts Three and Four, the defendants,

DAVID KAUFMAN and
DARREN ZALDIVAR,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 1594(d), 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:

- c. the real property located at 300 International Drive, Unit 2001, 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
- d. a 2018 Mercedes-Benz S, with Vehicle Identification Number WDDUG8JB4JA373846.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 1594(d), as a result of any act or omission of the defendants --

- f. cannot be located upon the exercise of due diligence;
- g. has been transferred or sold to, or deposited with, a third party;
- h. has been placed beyond the jurisdiction of the Court;

- i. has been substantially diminished in value; or
- j. 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 defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 1594(d).

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.

 5-13-2025
DEPUTY CLERK 3:19 PM