

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

TODD BALDWIN,

Defendant.

CASE NO. **CR 24-00582-BLF (NC)**

VIOLATIONS:

18 U.S.C. § 2422(b) – Enticement of Minors;

18 U.S.C. §§ 2252(a)(2) and (b) – Receipt of Child
Pornography;

18 U.S.C. §§ 2253 and 2428 – Criminal Forfeiture

SAN JOSE VENUE

I N F O R M A T I O N

The United States Attorney charges:

COUNT ONE: (18 U.S.C. § 2422(b) – Enticement of Minors)

Beginning in approximately December 2022 and continuing until approximately August 2023, in
the Northern District of California, the defendant,

TODD BALDWIN,

using the mail and any facility and means of interstate and foreign commerce, did knowingly persuade,
induce, entice, and coerce Minor Boy 1, who had not attained the age of 18 years, to engage in
prostitution and any sexual activity for which any person can be charged with a criminal offense,
specifically production of child pornography, in violation of 18 U.S.C. §§ 2251 and 2427.

All in violation of Title 18, United States Code, Section 2422(b).

INDICTMENT

1 COUNT TWO: (18 U.S.C. § 2422(b) – Enticement of Minors)

2 Beginning in approximately February 2023 and continuing until approximately August 2023, in
3 the Northern District of California, the defendant,

4 TODD BALDWIN,

5 using the mail and any facility and means of interstate and foreign commerce, did knowingly persuade,
6 induce, entice, and coerce Minor Boy 2, who had not attained the age of 18 years, to engage in
7 prostitution and any sexual activity for which any person can be charged with a criminal offense,
8 specifically production of child pornography, in violation of 18 U.S.C. §§ 2251 and 2427.

9 All in violation of Title 18, United States Code, Section 2422(b).

10 COUNT THREE: (18 U.S.C. §§ 2252(a)(2) and (b) –Receipt of Child Pornography)

11 Beginning in approximately December 2022 and continuing until approximately August 2023, in
12 the Northern District of California, the defendant,

13 TODD BALDWIN,

14 did knowingly receive visual depictions, using a means and facility of interstate and foreign commerce,
15 and the production of such visual depictions involved the use of Minor Boy 1 engaging in sexually
16 explicit conduct, and which visual depictions were of such conduct, all in violation of Title 18, United
17 States Code, Sections 2252(a)(2) and (b).

18 COUNT FOUR: (18 U.S.C. §§ 2252(a)(2) and (b) –Receipt of Child Pornography)

19 Beginning in approximately February 2023 and continuing until approximately August 2023, in
20 the Northern District of California, the defendant,

21 TODD BALDWIN,

22 did knowingly receive visual depictions, using a means and facility of interstate and foreign commerce,
23 and the production of such visual depictions involved the use of Minor Boy 2 engaging in sexually
24 explicit conduct, and which visual depictions were of such conduct, all in violation of Title 18, United
25 States Code, Sections 2252(a)(2) and (b).

26 FORFEITURE ALLEGATION: (18 U.S.C. §§ 2253 and 2428)

27 The allegations contained in this Indictment are re-alleged and incorporated by reference for the
28 purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 2253, and 2428.

Pursuant to Title 18, United States Code, Section 2428, upon conviction of Counts One or Two of this Indictment, the defendant,

TODD BALDWIN,

shall forfeit to the United States of America any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offenses and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offenses.

The property to be forfeited includes, but is not limited to:

- a. One Apple iPhone 13 (SJ425026-1) seized on August 17, 2023;
- b. One Apple iPad (SJ425026-2) seized on August 17, 2023; and
- c. One Apple iPhone (SJ425026-3) seized on August 17, 2023.

Pursuant to Title 18, United States Code, Section 2253(a), upon conviction of Counts Three or Four of this Indictment, the defendant,

TODD BALDWIN,

shall forfeit to the United States of America:

- a. any visual depiction described in Title 18, United States Code, Sections 2251 or 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and
- c. any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

The property to be forfeited includes, but is not limited to:

- a. One Apple iPhone 13 (SJ425026-1) seized on August 17, 2023;
- b. One Apple iPad (SJ425026-2) seized on August 17, 2023; and
- c. One Apple iPhone (SJ425026-3) seized on August 17, 2023.

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and Title 28, United States Code, Section 2461(c).

All pursuant to Title 18 United States Code Sections 2253, and 2428, Title 28, United States Code, Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

DATED: November 19, 2024

ISMAIL J. RAMSEY
United States Attorney

/s/

MARISSA HARRIS
Assistant United States Attorney

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

18 U.S.C. 2422(b): Enticement of Minors
 18 U.S.C. 2252(a)(2): Receipt of Child Pornography

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY:
 See attached penalty sheet.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

▶ TODD BALDWIN

DISTRICT COURT NUMBER

CR 24-00582-BLF (NC)**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

FBI Special Agent Colleen Dettling

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrP 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:
☐ U.S. ATTORNEY ☐ DEFENSE

SHOW
DOCKET NO.

☐ this prosecution relates to a
 pending case involving this same
 defendant

MAGISTRATE
CASE NO.

☒ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

} 24-71486-MAG

Name and Office of Person
 Furnishing Information on this form ISMAIL J. RAMSEY

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.
 Attorney (if assigned) AUSA Marissa Harris

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1) ☐ If not detained give date any prior
 summons was served on above charges ▶
- 2) ☐ Is a Fugitive
- 3) ☒ Is on Bail or Release from (show District)

NDCA

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☐ Awaiting trial on other charges
 If answer to (6) is "Yes", show name of institution

Has detainer ☐ Yes
 been filed? ☐ No

If "Yes"
 give date
 filed

DATE OF
ARREST ▶

Month/Day/Year
 10/28/2024

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY ▶

Month/Day/Year

☐ This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**

☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

UNITED STATES V. TODD BALDWIN
PENALTY SHEET

COUNTS ONE AND TWO: 18 U.S.C. § 2422(b) (Enticement of a Minor)

Penalties:

- Minimum Prison Term: 10 years
- Maximum Prison Term: Life
- Maximum Fine: \$250,000
- Minimum Supervised Release Term: 5 years
- Maximum Supervised Release Term: Life
- Mandatory Restitution
- Forfeiture
- Potential Deportation
- Special Assessment: \$100 (Per 18 U.S.C. § 3014(a), there is an additional \$5,000 special assessment for non-indigent defendants)
- Potential Sex Offender Registration

COUNTS THREE AND FOUR: 18 U.S.C. § 2252(a)(2) (Receipt of Child Pornography)

Penalties:

- Minimum Prison Term: 5 years
- Maximum Prison Term: 20 years
- Maximum Fine: \$250,000
- Minimum Supervised Release Term: 5 years (18 U.S.C. § 3583(k))
- Maximum Supervised Release Term: Life
- Mandatory Restitution
- Forfeiture
- Potential Deportation
- Special Assessment: \$100 (Per 18 U.S.C. § 3014(a), there is an additional \$5,000 special assessment for non-indigent defendants)
- Special Assessment for Child Pornography Defendants: Up to \$35,000 pursuant to 18 U.S.C. § 2259A
- Potential Sex Offender Registration

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CRIMINAL COVER SHEET

Instructions: Effective November 1, 2016, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

CASE NAME:

USA v. TODD BALDWIN

CASE NUMBER:

CR 24-00582-BLF (NC)

Is This Case Under Seal?

Yes

No

✓

Total Number of Defendants:

1

✓

2-7

8 or more

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes

No

✓

Venue (Per Crim. L.R. 18-1):

SF

OAK

SJ

✓

Is this a potential high-cost case?

Yes

No

✓

Is any defendant charged with a death-penalty-eligible crime?

Yes

No

✓

Is this a RICO Act gang case?

Yes

No

✓

Assigned AUSA

(Lead Attorney): Marissa Harris

Date Submitted: November 19, 2024

Comments: