### **FILED**

# UNITED STATES DISTRIC' NORTHERN DISTRICT OF CA

Mar 18 2025

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

### **CRIMINAL COVER SI**

<u>Instructions</u>: Effective November 1, 2016, this Criminal Cover She along with the Defendant Information Form, for each new criminal case.

CASE NAME:		CASE NUMBER: CR25-00073 SI
USA v. RICCI LEE WYNNE		CR
Is This Case Under Seal?	Yes	No ✓
<b>Total Number of Defendants:</b>	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): E. Wistar Wilson		<b>Date Submitted:</b> 03/18/2025
Comments:		
Co-counsel: AUSA Eric Cheng		

**RESET FORM** 

SAVE PDF

## United States District Court

## FOR THE NORTHERN DISTRICT OF CALIFORNIA

**VENUE: SAN FRANCISCO** 

CR25-00073 SI

UNITED STATES OF AMERICA,

٧.

RICCI LEE WYNNE,

**FILED** 

Mar 18 2025

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

DEFENDANT(S).

### INDICTMENT

18 U.S.C. § 2251(a) – Production of Child Pornography; 18 U.S.C. § 2253(a) – Criminal Forfeiture

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 18th day of

March 2025

Brenda Lopez, Deputy Clerk

Bail, \$ No Process

Hon. Sallie Kim, U.S. Magistrate Judge

	Case 3:25-cr-00073-CRB Documen	FILED		
1 2 3 4	PATRICK D. ROBBINS (CABN 152288) Acting United States Attorney	Mar 18 2025  Mark B. Busby  CLERK, U.S. DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA  SAN FRANCISCO		
<ul><li>5</li><li>6</li></ul>				
7				
8	UNITED STATES DISTRICT COURT			
9	NORTHERN DISTRICT OF CALIFORNIA			
10	SAN FRANCISCO DIVISION			
11	UNITED STATES OF AMERICA,	CASE NO. CR25-00073 SI		
12	Plaintiff,	VIOLATIONS:  18 U.S.C. § 2251(a) Production of Child		
13	v. )	<ul> <li>18 U.S.C. § 2251(a) – Production of Child</li> <li>Pornography;</li> <li>18 U.S.C. § 2253(a) – Criminal Forfeiture</li> </ul>		
14	RICCI LEE WYNNE,			
15	Defendant.			
16		SAN FRANCISCO VENUE		
17				
18	,			
19	INDIC	C T M E N T		
20	The Grand Jury charges:			
21	COUNT ONE: (18 U.S.C. § 2251(a) – Production of Child Pornography)			
22	On or about April 9, 2022, in the Northern	n District of California, the defendant,		
23	RICCI LEE WYNNE,			
24	did employ, use, persuade, induce, entice, and coerce a minor, known here as Minor 1, to engage in			
25	sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and			
26	having reason to know that such visual depiction would be transported using any means and facility of			
27	interstate and foreign commerce, and knowing and having reason to know that such visual depiction			
28	would be transported in and affecting interstate and foreign commerce, and using materials that have			
	INDICTMENT			

been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was transported using any means and facility of interstate and foreign commerce, and the visual depiction was transported in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Section 2251(a).

COUNT TWO: (18 U.S.C. § 2251(a) – Production of Child Pornography)

On or about October 29, 2022, in the Northern District of California, the defendant, RICCI LEE WYNNE,

did employ, use, persuade, induce, entice, and coerce a minor, known here as Minor 2, to engage in

did employ, use, persuade, induce, entice, and coerce a minor, known here as Minor 2, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, and knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce, and using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was transported using any means and facility of interstate and foreign commerce, and the visual depiction was transported in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Section 2251(a).

### FORFEITURE ALLEGATION: (18 U.S.C. § 2253(a))

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

Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offenses set forth in this Indictment, the defendant,

#### RICCI LEE WYNNE,

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;

1	b. any property, real or personal, constituting or traceable to gross profits or other		
2	proceeds obtained from the offenses; and		
3	c. any property, real or personal, used or intended to be used to commit or to promote		
4	the commission of the offenses.		
5	The property to be forfeited includes, but is not limited to:		
6	a. One Apple iPhone 12 Pro Max with IMEI 352871471193290, seized from Ricci Lee		
7	Wynne at San Francisco International Airport on or about November 24, 2024.		
8	If any of the property described above, as a result of any act or omission of the defendant:		
9	a. cannot be located upon exercise of due diligence;		
10	b. has been transferred or sold to, or deposited with, a third party;		
11	c. has been placed beyond the jurisdiction of the court;		
12	d. has been substantially diminished in value; or		
13	e. has been commingled with other property which cannot be divided without		
14	difficulty,		
15	the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,		
16	United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b)		
17	and Title 28, United States Code, Section 2461(c).		
18	All pursuant to Title 18, United States Code, Section 2253, Title 28, United States Code,		
19	Section 2461(c), and Federal Rule of Criminal Procedure 32.2.		
20			
21	DATED: March 18, 2025 A TRUE BILL.		
22			
23	/s/ Foreperson		
24	FOREPERSON		
25	PATRICK D. ROBBINS		
26	Acting United States Attorney		
27	/s/ E. Wistar Wilson		
28	E. WISTAR WILSON Assistant United States Attorney		
	INDICTMENT 3		

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE 1	O A CRIMINAL ACTION - IN U.S. DISTRICT COURT	
BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMEN	Name of District Court, and/or Judge/Magistrate Location	
OFFENSE CHARGED SUPERSEDI		
	SAN FRANCISCO DIVISION	
Counts 1-2: 18 U.S.C. 2251(a) - Production of Child Pet Pornography  Min		
Mis	DEFERDANT OIS	
	RICCI LEE WYNNE	
X Feld	DISTRICT COURT NUMBER	
PENALTY: Prison: 15 years (min.) - 30 years (max.) Fine: \$250,000 (max.)	CR25-00073 SI	
Supervised Release: 5 years (min.) - Life (max.) Special Assessment: \$5,100 (\$100 is mandatory)	01/25-00073 01	
Assessment: Up to \$50,000; Forfeiture	DEFENDANT	
PROCEEDING	IS NOT IN CUSTODY	
Name of Complaintant Agency, or Person (& Title, if any)	Has not been arrested, pending outcome this proceeding.  1) If not detained give date any prior	
FBI	summons was served on above charges	
person is awaiting trial in another Federal or State Court, give name of court	2) Is a Fugitive	
— give hame or court	FILED  3) Is on Bail or Release from (show [	
	Mark B. Busby	
this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District	CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO	
— per (direct one) i reorp 20, 21, or 40. Onew District	IS IN CUSTODY	
	4)  On this charge	
this is a reprosecution of charges previously dismissed	5) On another conviction	
which were dismissed on motion of:	Federal State	
U.S. ATTORNEY DEFENSE	6) X Awaiting trial on other charges	
J	If answer to (6) is "Yes", show name of institution U.S. Dist. Court, N.D. Cal., Case No. 3:19-cr-00120-CRB	
this prosecution relates to a pending case involving this same	Has detainer Yes If "Yes"	
defendant   MAGISTRAT	TE been filed? No filed	
prior proceedings or appearance(s)	DATE OF Month/Day/Year	
before U.S. Magistrate regarding this defendant were recorded under	ARREST 7	
Name and Office of Person	Or if Arresting Agency & Warrant were not  DATE TRANSFERRED Month/Day/Year	
Furnishing Information on this form Patrick D. Robbins (Acting)	TO U.S. CUSTODY	
x U.S. Attorney ☐ Other U.S. Agend	y	
Name of Assistant U.S. Attorney (if assigned) E. Wistar Wilson (AUSA)	This report amends AO 257 previously submitted	
	FORMATION OR COMMENTS	
PROCESS:	TORMATION OR COMMENTO	
☐ SUMMONS 🔀 NO PROCESS* ☐ WARRANT	Bail Amount:	
If Summons, complete following:  ☐ Arraignment ☐ Initial Appearance	* Where defendant previously apprehended on complaint, no new summons or	
Defendant Address:	warrant needed, since Magistrate has scheduled arraignment	
	Date/Time: Before Judge:	
Comments:		