

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Criminal No. 19-
	:	
v.	:	
	:	18 U.S.C. § 2251(a)
RAMON ZELAYA	:	18 U.S.C. § 2252A(a)(2)(A)
	:	18 U.S.C. § 2252A(a)(5)(B)
	:	18 U.S.C. § 2

**INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at  
Newark, charges:

**COUNT 1**  
**(Sexual Exploitation of a Child)**

From on or about August 20, 2018 through on or about September  
20, 2018, in Essex County, in the District of New Jersey, and elsewhere, the  
defendant,

**RAMON ZELAYA,**

did employ, use, persuade, entice, and coerce, and attempt to employ, use,  
persuade, entice, and coerce, a minor 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 and  
transmitted using a means and facility of interstate and foreign commerce and  
in and affecting interstate commerce, and which visual depiction was

transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2.

**COUNT 2**  
**(Receipt of Child Pornography)**

From on or about August 20, 2018 through on or about September 20, 2018, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

**RAMON ZELAYA,**

did knowingly receive and attempt to receive child pornography, as defined in Title 18, United States Code, Section 2256(8), which had been mailed, and, using any means and facility of interstate commerce, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2.

**COUNT 3**  
**(Possession of Child Pornography)**

From on or about August 20, 2018 through on or about September 20, 2018, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

**RAMON ZELAYA,**

did knowingly possess and attempt to possess, and knowingly access with intent to view and attempt to access with intent to view, material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which had been mailed, and, using any means and facility of interstate and foreign commerce, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2.

### **FORFEITURE ALLEGATIONS**

1. The allegations set forth above are realleged and incorporated herein by reference.
2. Upon conviction of any of the offenses set forth in this Indictment, defendant RAMON ZELAYA shall forfeit to the United States, pursuant to 18 U.S.C. § 2253, all of his right, title, and interest in the following:
  - (a) Any visual depiction described in 18 U.S.C. §§ 2251, 2251A, 2252, 2252A, 2252B, or 2260, 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 offense set forth in this Indictment, and all property traceable to such property; and
  - (c) Any property, real or personal, used or intended to be used to commit or to promote the commission of the offense set forth in this Indictment, and any property traceable to such property.
3. The property to be forfeited includes, but is not limited to, all of the defendant's right, title, and interest in the following items:
  - (a) One (1) Apple iPhone bearing International Mobile Equipment Identity ("IMEI") Number 353318073465352;
  - (b) One (1) Apple iPhone bearing IMEI Number 358372065982556;
  - (c) Four (4) black cellular telephones of unknown make, model, and IMEI; and

- (d) One (1) black LG cellular telephone bearing internal serial number 089446861504233017.

**Substitute Assets Provision**

4. If any of the above-described forfeitable property, 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 person;
- (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 subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253, to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL

  
FOREPERSON

  
CRAIG CARPENITO  
United States Attorney

CASE NUMBER: 19-

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**RAMON ZELAYA**

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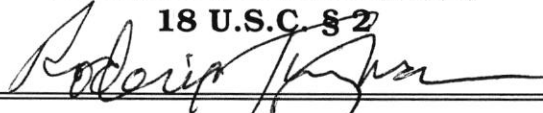
**INDICTMENT FOR**

**18 U.S.C. § 2251(a)**

**18 U.S.C. § 2252A(a)(2)(A)**

**18 U.S.C. § 2252A(a)(5)(B)**

**18 U.S.C. § 2**



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CRAIG CARPENITO

UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY

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