

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JASON KHAN,

Defendant.

**SEALED INDICTMENT**

26 Cr.

26 CRIM 0236

**COUNT ONE**

**(Sex Trafficking by Force, Fraud, or Coercion)  
(Victim-1)**

The Grand Jury charges:

**Overview**

1. JASON KHAN, the defendant, operates the foot fetish website FootPadNYC.com. KHAN used his foot fetish website to lure and recruit victims to hotel rooms. When women applying to be models on the website showed up to be interviewed by KHAN at Manhattan hotels, KHAN raped or sexually assaulted them.

2. On at least three occasions, JASON KHAN, the defendant, scheduled interviews with women who were seeking professional opportunities as foot models. On each of these occasions, KHAN used the promise of additional income as foot models to lure a woman to a Manhattan hotel room. Once in the hotel room, KHAN raped or sexually assaulted the women—penetrating two of the victims vaginally and, among other things, forcibly putting the third victim's feet on his penis. Each victim expressed her lack of consent to the sexual activity, but her non-consent was ignored by KHAN. Each of the victims reported her assault to law enforcement and others, and two of the victims performed rape kits in a hospital in the aftermath of their rapes.

**Statutory Allegations**

3. From at least in or about November 2018, up to and including in or about June

2019, in the Southern District of New York and elsewhere, JASON KHAN, the defendant knowingly, in and affecting interstate and foreign commerce, did recruit, entice, provide, obtain, maintain, and solicit by any means a person, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause the person to engage in a commercial sex act, and aided and abetted, and willfully caused the same, to wit, KHAN recruited, enticed, provided, obtained, maintained, and solicited, and aided and abetted, and willfully caused the recruitment, enticement, provision, obtaining, maintaining, and solicitation of, a female victim ("Victim-1"), and caused Victim-1 to engage in at least one commercial sex act, knowing and in reckless disregard of the fact that Victim-1 was engaging in the commercial sex act as result of force, fraud, and coercion.

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

**COUNT TWO**  
**(Sex Trafficking by Force, Fraud, or Coercion)**  
**(Victim-2)**

The Grand Jury further charges:

4. In or about March 2019, in the Southern District of New York and elsewhere, JASON KHAN, the defendant knowingly, in and affecting interstate and foreign commerce, did recruit, entice, provide, obtain, maintain, and solicit by any means a person, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause the person to engage in a commercial sex act, and aided and abetted, and willfully caused the same, to wit, KHAN recruited, enticed, provided, obtained, maintained, and solicited, and aided and abetted, and willfully caused the recruitment, enticement, provision, obtaining,

maintaining, and solicitation of, a female victim ("Victim-2"), and caused Victim-2 to engage in at least one commercial sex act, knowing and in reckless disregard of the fact that Victim-2 was engaging in the commercial sex act as result of force, fraud, and coercion.

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

**COUNT THREE**  
**(Sex Trafficking by Force, Fraud, or Coercion)**  
**(Victim-3)**

The Grand Jury further charges:

5. In or about April 2021, in the Southern District of New York and elsewhere, JASON KHAN, the defendant knowingly, in and affecting interstate and foreign commerce, did recruit, entice, provide, obtain, maintain, and solicit by any means a person, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause the person to engage in a commercial sex act, and aided and abetted, and willfully caused the same, to wit, KHAN recruited, enticed, provided, obtained, maintained, and solicited, and aided and abetted, and willfully caused the recruitment, enticement, provision, obtaining, maintaining, and solicitation of, a female victim ("Victim-3"), and caused Victim-3 to engage in at least one commercial sex act, knowing and in reckless disregard of the fact that Victim-3 was engaging in the commercial sex act as result of force, fraud, and coercion.

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

**FORFEITURE ALLEGATION**

6. As a result of committing the offenses alleged in Counts One, Two, and Three of this Indictment, JASON KHAN, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594, any and all property, real and personal, involved in, used, or intended to be used to commit or to facilitate the commission of said offenses; any and all

property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offenses; and any and all property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offenses and proceeds traceable to the commission of said offenses.

**Substitute Assets Provision**

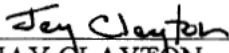
7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- 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 Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 1594;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

1/11/2026  
  
FOREPERSON

  
JAY CLAYTON  
United States Attorney