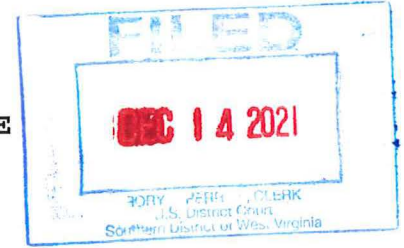


UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON GRAND JURY 2021
DECEMBER 14, 2021 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 2:21-cr-00235

18 U.S.C. § 2251 (a)

18 U.S.C. § 2251 (e)

TODD CHRISTOPHER ROATSEY

18 U.S.C. § 2252A (a) (2)

18 U.S.C. § 2252A (a) (5) (B)

18 U.S.C. § 2252A (b) (1)

18 U.S.C. § 2252A (b) (2)

18 U.S.C. § 2422 (b)

18 U.S.C. § 2427

S U P E R S E D I N G
I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

From on or about February 8, 2020 through on or about February 16, 2020, at or near Elkview, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant TODD CHRISTOPHER ROATSEY did employ, use, persuade, induce, entice, and coerce a minor, Minor Female 1, and attempt to employ, use, persuade, induce, entice, and coerce a minor, Minor Female 1, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, and the visual depictions were transmitted using any 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 (e).

COUNT TWO

On or about January 25, 2020, at or near Elkview, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant TODD CHRISTOPHER ROATSEY did employ, use, persuade, induce, entice, and coerce a minor, Minor Female 2, and attempt to employ, use, persuade, induce, entice, and coerce a minor, Minor Female 2, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, and the visual depictions were transmitted using any 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 (e).

COUNT THREE

From on or about January 25, 2020, through on or about February 16, 2020, at or near Elkview, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant TODD CHRISTOPHER ROATSEY, using a facility and means of interstate commerce, that is, the Internet and cellular network, did knowingly persuade, induce, entice, and coerce an individual, Minor Female 1, who had not attained the age of 18 years, to engage in sexual activity for which any person could have been charged with a criminal offense, and attempted to do so.

In violation of Title 18, United States Code, Sections 2422(b) and 2427.

COUNT FOUR

From on or about January 4, 2020, through on or about January 25, 2020, at or near Elkview, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant TODD CHRISTOPHER ROATSEY, using a facility and means of interstate commerce, that is, the Internet and cellular networks, did knowingly persuade, induce, entice, and coerce an individual, Minor Female 2, who had not attained the age of 18 years, to engage in sexual activity for which any person could have been charged with a criminal offense, and attempted to do so.

In violation of Title 18, United States Code, Sections 2422(b) and 2427.

COUNT FIVE

On or about January 25, 2020, at or near Elkview, Kanawha County, Virginia, and within the Southern District of West Virginia, defendant CHRISTOPHER TODD ROATSEY did knowingly receive and attempt to receive child pornography, as defined in 18 U.S.C. § 2256(8)(A), that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by cell phone and computer, and by using a means and facility of interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2252A(a)(2) and 2252A(b)(1).

COUNT SIX

On or about February 16, 2020, at or near Elkview, Kanawha County, Virginia, and within the Southern District of West Virginia, defendant CHRISTOPHER TODD ROATSEY did knowingly receive and attempt to receive child pornography, as defined in 18 U.S.C. § 2256(8)(A), that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by cell phone and computer, and by using a means and facility of interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2252A(a)(2) and 2252A(b)(1).

COUNT SEVEN

On or about July 16, 2021, at or near Elkview, Kanawha County, Virginia, and within the Southern District of West Virginia, defendant CHRISTOPHER TODD ROATSEY did knowingly distribute and attempt to distribute child pornography, as defined in 18 U.S.C. § 2256(8)(A), that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by cell phone and computer, and by using a means and facility of interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2252A(a)(2) and 2252A(b)(1).

COUNT EIGHT

On or about April 29, 2021, at or near Elkview, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant TODD CHRISTOPHER ROATSEY did knowingly access with intent to view material, that is, computer graphic image files, containing images and videos of child pornography, as defined in 18 U.S.C. § 2256(8)(A), that involved prepubescent minors and which had been 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 2252A(b)(2).

COUNT NINE

On or about October 28, 2021, at or near Elkview, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant TODD CHRISTOPHER ROATSEY did knowingly possess material, that is, computer graphic image files, containing images and videos of child pornography, as defined in 18 U.S.C. § 2256(8)(A), that involved prepubescent minors and which had been 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 2252A(b)(2).

FORFEITURE

In accordance with 18 U.S.C. §§ 981(a)(1)(C), 2428 and 2253(a), 28 U.S.C. § 2461, and Rule 32.2(a) of the Federal Rules of Criminal Procedure, and premised on the conviction of defendant TODD CHRISTOPHER ROATSEY of a violation of 18 U.S.C. §§ 2251 et seq. or 18 U.S.C. §§ 2421 et seq., as set forth in this superseding indictment, the defendant shall forfeit to the United States any visual depictions and any books, magazines, periodicals, films, videotapes, and other matter which contains such visual depictions, which were produced, transported, mailed, shipped, or received in connection with the violations set forth in this superseding indictment, any real and personal property constituting or traceable to gross profits or other proceeds obtained from the violations set forth in this superseding indictment, and any real and personal property used or intended to be used to commit or to promote the commission of the violations set forth in this superseding indictment, including, but not limited to, digital media, cell phone(s), tablet(s), and computer equipment seized on October 28, 2021.

WILLIAM S. THOMPSON
United States Attorney

By:



JENNIFER RADA HERRALD
Assistant United States Attorney