

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA

v.

GEORGE AREF NADER,

Defendant.

Criminal No. 1:19-CR-201

Count 1: 18 U.S.C. § 2252(a)(4) & (b)(2)
Possession of Visual Depictions of Minors

Count 2: 18 U.S.C. § 2423(a)
Transportation of a Minor With Intent To
Engage in Criminal Sexual Activity

CRIMINAL INFORMATION

COUNT 1

(Possession of Visual Depictions of Minors)

THE UNITED STATES ATTORNEY CHARGES THAT:

On a date between September 20, 2012 and October 1, 2012, within the Southern District of New York and elsewhere, the defendant, **GEORGE AREF NADER**, having previously been convicted of an offense under Chapters 71, 109A, 110, 117 of Title 18, United States Code, or the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor, did unlawfully and knowingly possess, or knowingly accessed with intent to view, one or more matters containing visual depictions of minors engaging in sexually explicit conduct and the production of such visual depictions involved the use of a minor engaging in that sexually explicit conduct, that has been mailed, or has been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate commerce or foreign commerce, or which was produced using materials which have

been mailed or so shipped or transported, by any means, including by computer, to wit:
electronic files depicting minor children engaging in sexually explicit conduct that had been
uploaded to a file sharing site on the Internet.

(All in violation of 18 U.S.C. § 2252(a)(4)(B) and (b)(2) (2011))

COUNT 2

(Transportation of a Minor With Intent To Engage in Criminal Sexual Activity)


THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

In or about February 2000, **GEORGE AREF NADER**, knowingly transported a 14-year old boy ("MINOR BOY 1"), who had not attained the age of 18 years, in interstate or foreign commerce, or in any commonwealth, territory or possession of the United States, with the intent that the boy engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, or attempted to do so; to wit, NADER transported MINOR BOY 1 from Europe to Washington-Dulles International Airport, located in the Eastern District of Virginia, by means of commercial airplane with the requisite intent.

(All in violation of Title 18, United States Code, Sections 2423(a) (Oct. 30, 1998) & 3283 (1994 & 2003 & 2006) & 3299 (2006) & D.C. Criminal Code §§ 22-3008 and 22-3009 (formerly codified at §§ 22-4108 and 22-4109)).

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By:


Jay V. Prabhu
Chief, Cybercrime Unit
Assistant United States Attorney