

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Holding a Criminal Term

Grand Jury Sworn in on August 11, 2021

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	GRAND JURY ORIGINAL
	:	
RICHARD JUDE DASCHBACH,	:	VIOLATIONS:
	:	18 U.S.C. §§§ 2423(c), (e), and 3238
Defendant.	:	(Engaging in Illicit Sexual Conduct in a Foreign Place)
	:	
	:	FORFEITURE:
	:	18 U.S.C. § 2428 and 21 U.S.C. § 853(p)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Between in or about January 2016 and December 2017, the defendant, **RICHARD JUDE DASCHBACH**, a citizen of the United States whose last known residence in the United States is Washington, D.C., did reside temporarily and permanently in a foreign country, that is, Timor-Leste, out of the jurisdiction of any particular State or District of the United States, and engage in and attempt to engage in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person, MINOR 1, whose identity is known to the Grand Jury.

(Engaging in Illicit Sexual Conduct in a Foreign Place, in violation of Title 18, United States Code, Sections 2423(c) and (e) and 3238)

COUNT TWO

From in or about December 2013 through in or about December 2019, the defendant, **RICHARD JUDE DASCHBACH**, a citizen of the United States whose last known residence in

the United States is Washington, D.C., did reside temporarily and permanently in a foreign country, that is, Timor-Leste, out of the jurisdiction of any particular State or District of the United States, and engage in and attempt to engage in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person, MINOR 2, whose identity is known to the Grand Jury.

(Engaging in Illicit Sexual Conduct in a Foreign Place, in violation of Title 18, United States Code, Sections 2423(c) and (e) and 3238)

COUNT THREE

From March 7, 2013, through in or about December 2016, the defendant, **RICHARD JUDE DASCHBACH**, a citizen of the United States whose last known residence in the United States is Washington, D.C., did reside temporarily and permanently in a foreign country, that is, Timor-Leste, out of the jurisdiction of any particular State or District of the United States, and engage in and attempt to engage in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person, MINOR 3, whose identity is known to the Grand Jury.

(Engaging in Illicit Sexual Conduct in a Foreign Place, in violation of Title 18, United States Code, Sections 2423(c) and (e) and 3238)

COUNT FOUR

Between in or about October 2014 and December 2018, the defendant, **RICHARD JUDE DASCHBACH**, a citizen of the United States whose last known residence in the United States is Washington, D.C., did reside temporarily and permanently in a foreign country, that is, Timor-Leste, out of the jurisdiction of any particular State or District of the United States, and engage in

and attempt to engage in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person, MINOR 4, whose identity is known to the Grand Jury.

(Engaging in Illicit Sexual Conduct in a Foreign Place, in violation of Title 18, United States Code, Sections 2423(c) and (e) and 3238)

COUNT FIVE

From March 7, 2013, through in or about May 2020, the defendant, **RICHARD JUDE DASCHBACH**, a citizen of the United States whose last known residence in the United States is Washington, D.C., did reside temporarily and permanently in a foreign country, that is, Timor-Leste, out of the jurisdiction of any particular State or District of the United States, and engage in and attempt to engage in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person, MINOR 5, whose identity is known to the Grand Jury.

(Engaging in Illicit Sexual Conduct in a Foreign Place, in violation of Title 18, United States Code, Sections 2423(c) and (e) and 3238)

COUNT SIX

From March 7, 2013, through in or about January 2018, the defendant, **RICHARD JUDE DASCHBACH**, a citizen of the United States whose last known residence in the United States is Washington, D.C., did reside temporarily and permanently in a foreign country, that is, Timor-Leste, out of the jurisdiction of any particular State or District of the United States, and engage in and attempt to engage in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person, MINOR 6, whose identity is known to the Grand Jury.

(Engaging in Illicit Sexual Conduct in a Foreign Place, in violation of Title 18, United States Code, Sections 2423(c) and (e) and 3238)

COUNT SEVEN

From March 7, 2013, through in or about December 2014, the defendant, **RICHARD JUDE DASCHBACH**, a citizen of the United States whose last known residence in the United States is Washington, D.C., did reside temporarily and permanently in a foreign country, that is, Timor-Leste, out of the jurisdiction of any particular State or District of the United States, and engage in and attempt to engage in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person, MINOR 7, whose identity is known to the Grand Jury.

(Engaging in Illicit Sexual Conduct in a Foreign Place, in violation of Title 18, United States Code, Sections 2423(c) and (e) and 3238)

FORFEITURE ALLEGATIONS

1. Upon conviction of the offenses alleged in Counts One through Seven, the defendant shall forfeit to the United States any interest in any property, real or personal, that was used or intended to be used to commit or facilitate the commission of these violations and any property, real or personal, constituting or derived from any proceeds the defendants obtained, directly or indirectly as a result of these violations, pursuant to 18 U.S.C. Section 2428. The United States will also seek a forfeiture money judgment equal to the value of any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violations; and any property, real or personal, constituting or derived from any proceeds the defendants obtained, directly or indirectly, as a result of such violations.

2. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- 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 that cannot be divided without difficulty;

the defendants shall forfeit to the United States any other property of the defendants, up to the value of the property described above, pursuant to 21 U.S.C. Section 853(p).

(Criminal Forfeiture, pursuant to Title 18, United States Code, Section 2428, and Title 21, United States Code, Section 853(p))

A TRUE BILL:

FOREPERSON

By /s/ Steven J. Grocki

Steven J. Grocki
Chief
Child Exploitation and Obscenity Section
Criminal Division
U.S. Department of Justice