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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ZOBAIDUL AMIN,

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) No. 3:22-cr-00055-SLG-MMS
)
) COUNT 1:
) CONSPIRACY TO PRODUCE CHILD
) PORNOGRAPHY
) Vio. of 18 U.S.C. § 2251(a), (e)
)
) COUNT 2:
) CONSPIRACY TO RECEIVE AND
) DISTRIBUTE CHILD
) PORNOGRAPHY
) Vio. of 18 U.S.C. § 2252A(a)(2),
) (b)(1)
)
) COUNT 3:
) CHILD EXPLOITATION
) ENTERPRISE
) Vio. of 18 U.S.C. § 2252A(g)(1), (2)
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Defendant.

-) COUNT 4:
-) PRODUCTION OF CHILD
-) PORNOGRAPHY
-) Vio. of 18 U.S.C. § 2251(a), (e)
-)
-) COUNT 5:
-) RECEIPT AND DISTRIBUTION OF
-) CHILD PORNOGRAPHY
-) Vio. of 18 U.S.C. § 2252A(a)(2),
-) (b)(1)
-)
-) COUNT 6:
-) CYBERSTALKING
-) Vio. of 18 U.S.C. §§ 2261A(2) and
-) 2261(b)(5)
-)
-) COUNTS 7-8:
-) AGGRAVATED IDENTITY THEFT
-) Vio. of 18 U.S.C. § 1028A(a)(1)
-)
-) COUNTS 9-13:
-) WIRE FRAUD
-) Vio. of 18 U.S.C. § 1343
-)
-) CRIMINAL FORFEITURE
-) ALLEGATION
-) 18 U.S.C. § 2253 and 28 U.S.C.
-) § 2461(c)
-)

INDICTMENT

The Grand Jury charges that:

Background

1. Beginning on a date unknown to the grand jury, and continuing to the date of this Indictment, within the District of Alaska and elsewhere, defendant ZOB Aidul Amin, also known as (“a/k/a”) 



[REDACTED] and co-conspirators known and unknown to the Grand Jury, used computers and interactive computer services connected through the Internet to trick, extort, and persuade minors to produce sexually explicit images of themselves and send the images to AMIN and others, and to transmit to AMIN live visual depictions of the minors engaging in sexually explicit activity.

2. At least one of the minor victims was located in the District of Alaska during this scheme.
3. At all times relevant to this Indictment, AMIN was over the age of 18. AMIN is a citizen of Bangladesh living in Malaysia.

Instagram, Snapchat, and Dropbox

4. Instagram is a service owned by Meta, a United States company and a provider of an electronic communications service as defined by 18 U.S.C. §§ 3127(1) and 2510. Specifically, Instagram is a free-access social networking service, accessible through its website and its mobile application, that allows subscribers to acquire and use Instagram accounts to share messages, multimedia, and other information with other Instagram users and the general public.
 - a. Each Instagram account is identified by a unique username chosen by the user. Users can change their usernames whenever they choose but no two users can have the same usernames at the same time. Instagram users can create multiple accounts and, if “added” to the primary account, can switch between the associated accounts on a device without having to repeatedly log-in and log-out.
 - b. Instagram users can “follow” other users to receive updates about their posts and to gain access that might otherwise be restricted by privacy settings (for example, users can choose whether their posts are visible to anyone or only to their followers). Users can also “block” other users from viewing their posts and searching for their account, “mute” users to avoid seeing their posts, and “restrict” users to hide certain activity and prescreen their comments. Instagram also allows users to create a

“close friends list” for targeting certain communications and activities to a subset of followers.

- c. Users have several ways to search for friends and associates to follow on Instagram, such as by allowing Meta to access the contact lists on their devices to identify which contacts are Instagram users. Meta retains this contact data unless deleted by the user and periodically syncs with the user’s devices to capture changes and additions. Users can similarly allow Meta to search an associated Facebook account for friends who are also Instagram users. Users can also manually search for friends or associates.
- d. Each Instagram user has a profile page where certain content they create and share (“posts”) can be viewed either by the general public or only the user’s followers, depending on privacy settings. Users can customize their profile by adding their name, a photo, a short biography (“Bio”), and a website address.
- e. One of Instagram’s primary features is the ability to create, edit, share, and interact with photos and short videos. Users can upload photos or videos taken with or stored on their devices, to which they can apply filters and other visual effects, add a caption, enter the usernames of other users (“tag”), or add a location. These appear as posts on the user’s profile. Users can remove posts from their profiles by deleting or archiving them.

- f. Users can interact with posts by liking them, adding or replying to comments, or sharing them within or outside of Instagram. Users receive notification when they are tagged in a post by its creator or mentioned in a comment (users can “mention” others by adding their username to a comment followed by “@”). An Instagram post created by one user may appear on the profiles or feeds of other users depending on a number of factors, including privacy settings and which users were tagged or mentioned.
- g. Instagram Direct, Instagram’s messaging service, allows users to send private messages to select individuals or groups. These messages may include text, photos, videos, posts, videos, profiles, and other information. Participants to a group conversation can name the group and send invitations to others to join. Instagram users can send individual or group messages with “disappearing” photos or videos that can only be viewed by recipients once or twice, depending on settings. Senders can’t view their disappearing messages after they are sent but do have access to each message’s status, which indicates whether it was delivered, opened, or replayed, and if the recipient took a screenshot. Instagram Direct also enables users to video chat with each other directly or in groups.
- h. Instagram has a search function which allows users to search for accounts by username, user activity by location, and user activity by

hashtag. Hashtags, which are topical words or phrases preceded by a hash sign (#), can be added to posts to make them more easily searchable and can be “followed” to generate related updates from Instagram.

- i. In some cases, Instagram users may communicate directly with Meta about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users.
 - j. At all times relevant to this Indictment, Instagram’s Terms of Use prohibited impersonating others; using Instagram for an illegal purpose, such as sharing child pornography; posting another person’s private or confidential information without permission; and harassing, intimidating, or threatening other users.
5. Snapchat owns and operates a free access social networking website that can be accessed at <http://www.snapchat.com>. Snapchat is a cellphone application with which users can take photos, record short videos, add text and drawings to such photos or video, and send these contents to a selected list of recipients. Photos and videos sent over the application are known as “snaps.” Snapchat also enables users to communicate by text in a way similar to an instant-messaging application via chat and video chat features. Snapchat is one of the most popular applications for sending and receiving “self-destructing” messages, pictures, and videos.

- a. Users can set a time limit on their snaps that affect how long they may be viewed by the receiver of the snap. At the end of the viewing time, the snap disappears and the receiving party can no longer view it without use of the Replay feature. The Replay feature allows a user, once a day, to re-watch a snap he received, even though the time limit on the snap may expire. Users may use the Replay feature on one snap per day only.
- b. Snapchat users can send text messages to others using the Chat feature. Once a user leaves the Chat screen, messages viewed by both the sender and the receiver will no longer be visible. However, Snapchat does allow users to “save” specific messages, enabling portions of the conversation to be retained.
- c. Snapchat also allows users to save sent or unsent “snaps” and posted “Stories,” photos, and videos to “Memories,” which is Snapchat’s cloud-storage service. A user can also edit and send Snaps as well as create “Stories” from the saved “Memories.” The “Memories” will be saved by Snapchat until deleted by the user.
- d. Snapchat also provides users with the ability to video chat with each other via the application.
- e. Snapchat users may create a list of Friends by which they can identify other Snapchat users for the purposes of sending and receiving information. Users may search for and add Friends by a number of

methods, including username, the user's cellphone address book and other methods allowed by the application.

- f. When a user creates an account they make a unique Snapchat username. This is the name visible to other Snapchat users.
- g. At all times relevant to this Indictment, Snapchat's Terms of Service prohibited using Snapchat for an illegal purpose; bullying, harassing, intimidating, or threatening other users; posting content containing pornography; and creating another account if Snapchat has already disabled that user's account.

6. Dropbox is a file hosting service that offers cloud storage, file synchronization, personal cloud, and client software. Dropbox allows users to create a special folder on each of their computers, which Dropbox then synchronizes so that it appears to be the same folder (with the same contents), regardless of which computer is used to view it. Files placed in this folder are also accessible through website and mobile phone applications.

- a. Dropbox provides users with a certain amount of free data storage, and if the user wants more storage, the user can pay for it. Users can access Dropbox from anywhere in the world using the Internet. For example, a user may take a photograph from a smartphone, upload that photo to Dropbox, and then erase the photo from the user's phone. The photograph now resides in the user's "cloud." The user can then access

his/her Dropbox account from a desktop computer and download the photograph to that computer.

- b. Another feature of Dropbox is sharing. A Dropbox user can share certain files he/she designates by sending a web link to another user. It then gives the additional users access to those particular files.
- c. At all times relevant to this Indictment, Dropbox's Terms of Service prohibited publishing, sharing, or storing child sexually exploitive material and using Dropbox to violate the law in any way.

Finding Victims and Obtaining Sexually Explicit Images

7. ZOB AIDUL AMIN generally targeted victims under the age of 18 and as young as 11 years old.
8. To find victims, AMIN often posed as a teenage boy on Instagram, sometimes using photos of real teenage boys, and requested nude images of the victim. Other times, AMIN posed as a teenage girl, messaged a potential victim, portrayed himself as gay or bisexual, asked about the victim's sexual orientation, and then requested nude images. Alternatively, AMIN promised to stop extorting current minor victims if they helped him find new victims or sent him nude images of other girls.

Threatening to Expose Victims to Obtain More Images

9. Once he had obtained a nude image, AMIN began threatening to expose the victim unless the victim provided additional sexually explicit images and videos to him.

10. By exposure, AMIN meant that he would share the victim's nude images with the victim's friends and followers on social media. AMIN often shared screenshots of the victim's friends or followers list while threatening exposure. AMIN frequently followed through on his threats, sharing nude images of multiple minor victims to their social media followers or directing his co-conspirators to do so.
11. After threatening exposure, AMIN directed victims to connect with him on Snapchat and then demanded a specific number of images and videos per day. The images and videos depicted minor victims' genitalia, and AMIN also demanded that they vaginally and anally penetrate themselves with various objects.
12. AMIN sometimes video chatted with minor victims, including masturbating while victims engaged in sexually explicit conduct.
13. Many victims confronted AMIN with their age, and some called him a pedophile. In response to one victim who stated her family member was a police officer, AMIN stated "ur local pd won't do shit."
14. In one chat string, Minor Victim N questioned why he was doing this to her, and AMIN responded, "Depressed girls are the preetiast [sic] not even lying."

Using False Promises and Fake Accounts to Find More Victims

15. AMIN frequently created new Snapchat and Instagram accounts with female-seeming usernames or usernames similar to victims' names and used those to

re-contact minor victims for continued exploitation after the victim had tried to stop communicating with him.

16. For example, on December 23, 2021, AMIN used Snapchat account [REDACTED] to communicate with Minor Victim R. AMIN stated his name was Sarah and that he was 15 years old. When Minor Victim R suspected that “Sarah” was actually AMIN, he responded “Do I look like a fuckin guy to you?”

Use of Multiple Accounts to Facilitate Sexual Exploitation

17. As described above, AMIN initially contacted minor victims on Instagram but later directed them to connect with him on Snapchat. AMIN then used the Snapchat platform as a primary method of demanding child pornography from minor victims.
18. Although AMIN’s accounts were regularly disabled by Snapchat, he simply created new accounts, reconnected with the minor victims, and exploited new victims.
19. In order to create new Snapchat accounts, AMIN had to enter a first and last name, birthdate older than 13, and a password. AMIN then had to enter either a mobile number or an email address, to which an authentication code would be sent to verify possession of that email address or phone number.
20. On June 29, 2021, AMIN received an email from Snapchat stating that his [REDACTED] account was deleted due to violations of Snapchat’s Terms of Service. The email expressly stated that the account could not be recovered and

that “Snapchatters who have had their accounts deleted are prohibited from creating new account.” Despite that email, AMIN continued creating new Snapchat accounts. For example, AMIN’s account [REDACTED] was created on July 17, 2021.

21. On August 25, 2021, AMIN received an email from Snapchat stating that his [REDACTED] account was deleted due to violations of Snapchat’s Terms of Service. The email expressly stated that the account could not be recovered and that “Snapchatters who have had their accounts deleted are prohibited from creating new account.” Despite that email, AMIN continued creating new Snapchat accounts. For example, AMIN’s account [REDACTED] was created on September 3, 2021.

22. On December 25, 2021, AMIN received an email from Snapchat stating that his [REDACTED] account was deleted due to violations of Snapchat’s Terms of Service. The email expressly stated that the account could not be recovered and that “Snapchatters who have had their accounts deleted are prohibited from creating new account.” Despite that email, AMIN continued creating new Snapchat accounts. On December 26, 2021, AMIN created Snapchat account [REDACTED]

23. Each time AMIN created a new Snapchat account, he directed minor victims to connect with his new account and used it to continue his extortion scheme.

24. For example, on December 26, 2021, AMIN used Snapchat account

[REDACTED] to contact Minor Victim K and directed her to add him on his [REDACTED] account because his other account “keeps getting locked.”

25. On January 16, 2022, AMIN contacted Minor Victim F on Instagram and told

her to add him on Snapchat using his account [REDACTED]. On January 20, 2021, Snapchat deleted account [REDACTED]. That day, AMIN told Minor Victim F to add his new account [REDACTED] because his other account “just got deleted.”

26. AMIN similarly created new Instagram accounts after others were deleted.

Like Snapchat, creating a new Instagram account requires a verified phone number or email address.

27. On September 20, 2021, AMIN’s Instagram account [REDACTED] was

deleted. On September 25, 2021, AMIN used Snapchat account [REDACTED] to contact Minor Victim F, saying “Give me ur phone number. My insta acc got locked. I need a number to try and get it back.” AMIN added, “They will send u a code just send it to me.” In response, Minor Victim F provided her phone number, which AMIN used to attempt to unlock his Instagram account.

28. On January 10, 2022, Instagram account [REDACTED] was deleted.

Instagram account [REDACTED] was created on January 16, 2022. Shortly afterward, AMIN used [REDACTED] to communicate with Minor Victim

F. AMIN began the chat by stating “It’s me” and “My other account got deleted.”

29. On January 28, 2022 AMIN used Snapchat account [REDACTED] to direct an unidentified victim to create him a new Instagram account because his “device got banned” so he “can’t make new accounts.” AMIN provided the victim a name ([REDACTED]), email address, and password to use when making the new account. The victim sent AMIN screenshots of each step of the process. AMIN used the email account he provided to retrieve the authentication code, which he sent to the victim to complete the registration process.

30. As of the date of this Indictment, AMIN has used over 80 different Snapchat accounts and over 40 Instagram accounts, some of which remain active.

Sharing Child Sexual Abuse Material with Others

31. AMIN amassed a large collection of child sexual abuse material through this course of conduct. AMIN then sent the images and videos to Co-conspirator 1, who uploaded them to Dropbox, maintaining separate Dropbox folders for each victim. Co-conspirator 1 then sent links to those folders back to AMIN, who shared them with victims to extort more images.

32. Additionally, Co-conspirator 1 and AMIN shared links to the Dropbox folders containing sexually explicit images and videos of minor victims with many co-conspirators. Before sharing the links, AMIN required the intended recipients to contact minor victims and say demeaning things, or to share a victim’s sexually explicit images with the victim’s social media followers. These

communications occurred with at least three other individuals, some of whom are listed in Paragraphs 66 to 69.

33.



34.



Exploitation of Individual Victims

35. All the following minor victims were under the age of 18 at all times relevant to this Indictment.

36. Minor Victim A

- a. At all times relevant to this Indictment, Minor Victim A lived in the District of Alaska.
- b. From September 2021 to December 2021, AMIN used Instagram accounts [REDACTED] and Snapchat accounts [REDACTED] to communicate with Minor Victim A.
- c. AMIN obtained a partially nude image of Minor Victim A from a different minor, and used that image to coerce Minor Victim A into creating and sending AMIN images and videos of child pornography depicting Minor Victim A.
- d. AMIN contacted Minor Victim A daily, requesting eight sexually explicit videos and ten sexually explicit images each time with Minor Victim A's face visible. AMIN also required Minor Victim A to participate in video calls with him where she engaged in sexually explicit conduct.
- e. Minor Victim A's chats with AMIN include multiple videos of child pornography depicting Minor Victim A.

- f. Minor Victim A described making the videos as “like raping myself because I don’t want to do it and it hurts sometimes.”
- g. On November 11, 2021, AMIN used Snapchat account [REDACTED] to make the following false promises to Minor Victim A: “don’t worry I won’t ever break ur trust,” and “I wont show ur nudes to anyone.”
- h. From Snapchat account [REDACTED] AMIN told Minor Victim A “Now I want u to decide rn. Will u stay or leave..If u leave I will expose u and that’s that..But if u are staying..U have to change how u behave with me..I am not asking the world from u. Just listen to somethings that I want from u. I will let u go eventually. Some day. If u stay u can go with out any harm being done. Do now decide will u stay or leave.” During that conversation, AMIN send Minor Victim A multiple screenshots with proof that he had kept the images and videos of child pornography that he had previously received.
- i. After Minor Victim A stopped communicating with AMIN, AMIN sent sexually explicit videos of Minor Victim A to her friends and family via the Internet.
- j. Co-conspirator 1 created a Dropbox link containing child pornography of Minor Victim A that was shared with a person unknown to the Grand Jury.

37. Minor Victim B



- a. From September 2021 to January 2022, AMIN used Snapchat accounts [REDACTED] to communicate with Minor Victim B.
- b. AMIN demanded “nudes” from Minor Victim B and threatened to expose her if she did not comply. Minor Victim B provided AMIN with images and videos of child pornography. AMIN gave Minor Victim B specific instructions about what to do in the photos and videos.

38. Minor Victim C

- a. From September 2021 to January 2022, AMIN used Instagram accounts [REDACTED] and Snapchat accounts [REDACTED] to communicate with Minor Victim C.
- b. AMIN told Minor Victim C if she did not continue to send him nude pictures and videos he would post the nude photo he had of her on the Internet. AMIN told Minor Victim C he would expose her to all of her friends just like he did to a friend of hers, whom he listed by name. Minor Victim C sent him images and videos for two weeks.
- c. Co-conspirator 1 created a Dropbox link containing child pornography of Minor Victim C.

- d. On September 15, 2021 AMIN sent a message to Co-conspirator 1 asking if Co-conspirator 1 could add Minor Victim C’s new nudes and that AMIN will make her send more.

39. Minor Victim D

- a. From September 2021 to October 2021, AMIN used Snapchat accounts  to communicate with Minor Victim D.
- b. AMIN required Minor Victim D to send ten photos and ten videos each day or do a video call with him, or he would send her nude images to her friends. Minor Victim D sent AMIN sexually explicit images and videos.
- c. AMIN later exposed Minor Victim D by sharing her child pornography images to her friends and followers.
- d. On September 19, 2021, AMIN messaged Minor Victim D a screenshot from his  Snapchat account showing that his followers were asking for nude images of Minor Victim D. AMIN stated “I will delete the account after the deal is done.” Instead AMIN continued extorting images from Minor Victim D.

e.



[REDACTED]

f. [REDACTED]

g. [REDACTED]

h. [REDACTED]

40. Minor Victim E

- a. AMIN initially contacted Minor Victim E in approximately May 2020.
- b. From April 2021 to January 2022, AMIN used Instagram accounts
- c. [REDACTED] and Snapchat accounts
[REDACTED] to
communicate with Minor Victim E.
- d. AMIN directed Minor Victim E to send him sexually explicit images
and videos of herself, which she did.

- e. AMIN took screenshots of Minor Victim E's followers and threatened to send the images to her friends and family if she did not continue sending images and videos.
- f. On at least two occasions, AMIN carried out his threats by sharing images and videos of Minor Victim E with others.
- g. AMIN also sent Victim E sexually explicit images of other girls he stated he was extorting and sent Victim E a Dropbox link that contained about 300 images/videos of herself.
- h. Between September 30, 2021 and December 17, 2021, AMIN, using Instagram account [REDACTED] told Minor Victim E to send "5 pics and 3 vids." AMIN told Victim E, "Bitch let me follow u" referring to Instagram and added that he already had all of her followers saved. AMIN graphically described to Minor Victim E the sexual acts he wanted her to do and referred to exposing Minor Victim E as he continued to direct the victim to record additional sexual acts.
- i. In January 2022, AMIN, using Snapchat account [REDACTED] directed Minor Victim E to send him a list of an unidentified minor victim's Instagram followers.
- j. Minor Victim E stated that she has maintained communication with AMIN because "it's not like I can leave."

41. Minor Victim F

- a. From September 2021 to March 2022, AMIN used Instagram accounts [REDACTED] and Snapchat accounts [REDACTED] to communicate with Minor Victim F.
- b. In September and October 2021, AMIN, using Snapchat account [REDACTED] directed Minor Victim F to provide him images and videos of child pornography, including specific instructions about how many to send, how to pose, and where to place the camera.
- c. From September to December 2021, AMIN, using Instagram account [REDACTED] told Minor Victim F that he shared her images and that he has “a lot of people who are fans of you.” He told Minor Victim F it was her fault he exposed her because she did not reply to him in a timely manner.
- d. In January 2022, AMIN, using Instagram account [REDACTED] threatened to expose Minor Victim F unless she provided “nudes and call,” and he referenced several of her friends he wanted her to recruit for him.
- e. Co-conspirator 1 created a Dropbox link containing child pornography of Minor Victim F.

42. Minor Victim G

- a. From September 2021 to November 2021, AMIN used Instagram account [REDACTED] and Snapchat accounts [REDACTED] and [REDACTED] to communicate with Minor Victim G.
- b. AMIN directed Minor Victim G to “do nudes for me for 7 days..12 vids and 12 pics each day.” AMIN appeared to post a child pornography image of Minor Victim G and stated “I will take down ur nude s if u get a girl to agree to do the deal for u.”
- c. Regarding exposure of Minor Victim G, AMIN stated “I will expose u..And everyone gona talk about it for a few days and u will feel like shit since there’s nothing u can do about it..Then a few days will go by and u will soon stsr to forget abou it..And u will on living ur life..Then a few months later since I still have ur nudes and they aren’t deletedd..I will text u again for nudes and u will either block me or say ‘no idc u already exposed me once’ and then I will expose u again..And its gona keep goin on and on and on..Ur boyfriends or who ever u date..They will be affected more then u.”
- d. Co-conspirator 1 created a Dropbox link containing child pornography of Minor Victim G.
- e. AMIN sent Minor Victim G’s images to a group of individuals who began harassing Minor Victim G for more images. At one point, 586 people had added Minor Victim G on Snapchat.

- f. AMIN threatened to come kill Minor Victim G if she didn't send nude images and videos. AMIN also told Minor Victim G to kill herself because she wasn't worth it.
- g. On September 15, 2021, AMIN told Co-conspirator 1 that he had another girl to make a Dropbox and then provided the Instagram account for Minor Victim G followed by 3 videos and one image of child pornography.

43. Minor Victim H

- a. In August, 2021, AMIN contacted Minor Victim H using Instagram account [REDACTED]
- b. AMIN sent Minor Victim H two images of child pornography depicting Minor Victim H and stated that he had screenshots of all of her followers.
- c. AMIN threatened Minor Victim H that if she did not connect with his Snapchat account [REDACTED] then he would expose her.

44. Minor Victim I

- a. From June 2021 to March 2022, AMIN used Instagram accounts [REDACTED] and Snapchat accounts [REDACTED] to communicate with Minor Victim I.
- b. AMIN sent images of child pornography to Minor Victim I and warned her not to block him, saying "I have ur nudes now with ur face in it

too.” AMIN told Minor Victim I to add him on Snapchat and provided his account [REDACTED] AMIN said “just add me back I promise I won’t expose u,” and “please don’t ignore my warning I don’t wana expose ur nudes with ur face in them.”

- c. Co-conspirator 1 created a Dropbox link containing child pornography of Minor Victim I.
- d. A person unknown to the Grand Jury created an additional Dropbox link containing child pornography of Minor Victim I.

45. Minor Victim K

- a. From April 2021 to January 2022, AMIN used Instagram account [REDACTED] and Snapchat accounts [REDACTED] [REDACTED] to communicate with Minor Victim K.
- b. In April 2021, AMIN, using Instagram account [REDACTED] threatened to expose Minor Victim K. AMIN showed MINOR VICTIM K a file on his computer containing images of child pornography depicting Minor Victim K.
- c. In December 2021, AMIN, using Snapchat account [REDACTED] directed Minor Victim K to add his [REDACTED] account because his other account “keeps getting locked.”

46. Minor Victim L

- a. In January 2022, Co-conspirator 1 contacted Minor Victim L using Snapchat account [REDACTED]
- b. Co-conspirator 1 directed Minor Victim L to send him sexually explicit images and videos of herself, which she did.

47. Minor Victim M

- a. From at least August 2021 to January 2022, AMIN used Snapchat accounts [REDACTED] to communicate with Minor Victim M.
- b. AMIN sent Minor Victim M nude photos of her that she had sent to a friend several months earlier. AMIN told Minor Victim M to send more images to him or he would send the pictures he had out to her friends and family. Minor Victim M complied, and AMIN then gave her a time frame of when he would “let her go.”
- c. AMIN demanded Minor Victim M send him five to seven sexually explicit images and videos four times per week that depicted Minor Victim M’s face.
- d. In addition to the above-listed accounts, AMIN added Minor Victim M on about five other Snapchat accounts. AMIN took screen shots of Victim M’s Instagram followers when she added him to Instagram.
- e. AMIN made Victim M do video calls with him on Snapchat. AMIN screen recorded the videos and threatened to send them to others.

Sometimes AMIN would just watch and other times AMIN would masturbate while telling Minor Victim M what to do.

48. Minor Victim N

- a. From September 2021 to January 2022, AMIN used Snapchat accounts


 to communicate with Minor Victim N.

- b.



- c. On November 21, 2021, AMIN sent Co-conspirator 1 a series of child pornography videos of Minor Victim N. AMIN wrote “Her name is [Minor Victim N].” Co-conspirator 1 replied and sent AMIN a Dropbox link containing Minor Victim N’s child pornography images.

49. Minor Victim O

- a. In January 2022, Co-conspirator 1 contacted Minor Victim O using Snapchat account 

- b. Co-conspirator 1 directed Minor Victim O to send him sexually explicit images and videos of herself, which she did.

50. Minor Victim Q

- a. Between September 2021 and January 2022, AMIN used Snapchat accounts [REDACTED] to communicate with Minor Victim Q.
- b. AMIN directed Minor Victim Q to get her friends to add him as a friend on social media. He used Victim Q as an intermediary to warn that he would expose them.
- c. On December 30, 2021, Minor Victim Q sent AMIN two videos of child pornography depicting Minor Victim Q. The same day, Minor Victim Q stated, “hey could you make sure you let me go at least before I go into highschool?” In explaining why AMIN should let her go, Minor Victim Q said she helped him with “like 15 girls.” Minor Victim Q also stated, “I’m a kid I can’t deal w this stuff,” “an I shouldn’t have to,” and “jus let me be a kid.”

51. Minor Victim R

- a. In December 2021, AMIN communicated with Minor Victim R using Snapchat accounts [REDACTED] and [REDACTED]
- b. AMIN described to Minor Victim R exactly what he wanted her to do in the pornographic videos she created for him.

- c. AMIN repeatedly threatened to expose Minor Victim R, even after she revealed that she was suicidal, to which AMIN responded “I don’t care anymore.”
- d. AMIN also contacted Minor Victim R using Snapchat account [REDACTED] and stated “I will only stop expsing u and deleted all ur nuxes if you do my 5 days deal.”
- e. Co-conspirator 1 created a Dropbox link containing child pornography depicting Minor Victim R.

52. Minor Victim S

- a. In December 2021, AMIN communicated with Minor Victim S using Snapchat account [REDACTED]
- b. Minor Victim S sent AMIN images and videos of child pornography depicting Minor Victim S.
- c. Co-conspirator 1 created a Dropbox link containing child pornography of Minor Victim S.

53. Minor Victim T

- a. Between November 2021 and January 2022, AMIN communicated with Minor Victim T using Snapchat accounts [REDACTED] and [REDACTED]
- b. Minor Victim T sent AMIN a video of child pornography.

- c. When Minor Victim T told AMIN that she would contact the authorities, AMIN responded, “I am sending ur nudes to all ur friends school everyone.”

54. Minor Victim U

- a. Between September 2021 and November 2021, AMIN used Snapchat account [REDACTED] to communicate with Minor Victim U.
- b. Initially, AMIN misrepresented his age, saying he was 15 years old. Once he obtained sexually explicit images from Minor Victim U, AMIN began threatening to expose her, stating: “I have screenshots of all ur followers and ur nudes too,” “I want u to send me nudes for 7 days.. 12 vids and 12 pics each day..How I ask..So u just gotta be good abd follow instructions,” “And in return after the 7 days I will delete all ur nudes.”
- c. As a result, Minor Victim U sent AMIN additional sexually explicit images and videos. Minor Victim U stated, “you honestly make me hate my body, every inch of it.”
- d. Despite promising to end the exploitation after 7 days, AMIN continued threatening to expose Minor Victim U for months. For example, AMIN sent Minor Victim U a screenshot of his Snapchat story where he had shared Minor Victim U’s Snapchat username and a nude image of her with the statement “HMU if u want her nudes boys”

- e. About three weeks later, AMIN threatened to expose Minor Victim U unless she did a video call with him.
- f. AMIN shared sexually explicit images and videos of Minor Victim U with Co-conspirator 1 and another individual.

55. Minor Victim V

- a. In November 2021 and December 2021, AMIN used Snapchat accounts [REDACTED] to communicate with Minor Victim V.
- b. AMIN successfully solicited sexually explicit images and videos from Minor Victim V. AMIN threatened to expose Minor Victim V if she did not comply with his demands for more images, stating “Okay now u don’t have a choice u either be good and listen to me or I have to expose u.”
- c. At one point, Minor Victim V expressed suicidal ideations, and AMIN responded, “U sure? Shud I post u then?”
- d. On November 3, 2021, AMIN falsely promised Minor Victim V that he would delete her images if she complied with his demands 10 more times.
- e. However, AMIN later contacted Minor Victim V from a different Snapchat account and sent her screenshots of her sexually explicit images as well as her social media followers. AMIN stated “please come back [REDACTED] Unblock me and add me back. If u do block

me here too I won't ask u anymore..I will start exposing u." AMIN also sent Minor Victim V a screenshot of a post he made with an image of Minor Victim V along with the statement "Who ever wants the drop box link text me.. u have to do a task first."

- f. AMIN shared sexually explicit images and videos of Minor Victim V with Co-conspirator 1. Co-conspirator 1 created D Dropbox link containing child pornography of Minor Victim S.
- g. In December 2021 and January 2022, Co-conspirator 1 communicated with Minor Victim V using Snapchat account [REDACTED] and directed Minor Victim V to send him sexually explicit images.

56. Minor Victim X

- a. Between September 2021 and January 2022, AMIN used Snapchat accounts [REDACTED] to communicate with Minor Victim X.
- b. AMIN demanded that Minor Victim X obey his rules, stating, "Do u remember the first day when I was explain u the deal..I told u just be good abd obey and nothing will ever happen, and "Now make up ur mind. Will u obey me or not." Minor Victim X responded, "yes I can obey you."
- c. AMIN repeatedly solicited sexually explicit images and videos, which Minor Victim X sent.

- d. AMIN demanded the Minor Victim X create him a new Instagram account, saying, “I need u to make a new insta account..I will give u the email and everything” and “All u have to do is make the account.” AMIN said he needed this because his device got banned and he was not able to make new Instagram accounts.

57. Minor Victim Y

- a. In September 2021, Co-conspirator 1 used Snapchat account [REDACTED] [REDACTED] to communicate with Minor Victim Y.
- b. Co-conspirator 1 directed Minor Victim Y to provide him sexually explicit images and videos, which she did.

58. Minor Victim Z

- a. Between September 2021 and January 2022, AMIN used Snapchat accounts [REDACTED] to communicate with Minor Victim Z.
- b. AMIN threatened to expose Minor Victim Z unless she sent him very specific sexually explicit images and videos, and she complied.

59. Minor Victim AA

- a. Between September 2021 and January 2022 AMIN used Snapchat accounts [REDACTED] and Co-conspirator 1 used Snapchat account [REDACTED] to communicate with Minor Victim AA.

- b. Co-conspirator 1 created a Dropbox folder containing child pornography depicting Minor Victim AA.
- c. In September 2021, AMIN, using Snapchat account [REDACTED] threatened Minor Victim AA with exposure and sent her a Dropbox link containing Minor Victim AA's child pornography images. On September 21, 2021, AMIN falsely promised to delete the Dropbox folder containing Minor Victim AA's child pornography images if she complied with his demands.
- d. [REDACTED]

60. Minor Victim BB

- a. In January 2022, AMIN used Snapchat account [REDACTED] to communicate with Minor Victim BB.
- b. When AMIN initially tried to contact Minor Victim BB on Snapchat, she blocked him. In response, AMIN sent a partially nude image of Minor Victim BB to students from her school. Minor Victim BB then unblocked AMIN.
- c. In January 2022, AMIN sent Minor Victim BB a screenshot video of AMIN scrolling through child pornography images of Minor Victim BB on AMIN's phone. AMIN solicited, and Minor Victim BB sent, images and videos of child pornography depicting Minor Victim BB.

61. Minor Victim CC

- a. In October 2021, AMIN used Snapchat accounts [REDACTED] and [REDACTED] to communicate with Minor Victim CC.
- b. During their chat conversation, AMIN bragged about how he obtained Minor Victim CC's list of Instagram followers. AMIN explained to Minor Victim CC that he found one of her friend's TikTok accounts, used that to find another person's TikTok account, found that person's Instagram account, used that to determine Minor Victim CC's Instagram username, and directed another minor victim to follow Minor Victim CC on Instagram in order to get a list of all her Instagram followers.
- c. AMIN obtained images of child pornography depicting Minor Victim CC and used those to extort additional images.
- d. AMIN also used Snapchat account [REDACTED] to offer his followers additional nude images of Minor Victim CC in exchange for sending a nude image to three of Minor Victim CC's Instagram followers. In response, Co-conspirator 2 sent one of Minor Victim CC's followers a nude image.

62. Minor Victim DD

- a. From October 2021 to January 2022, AMIN used Snapchat accounts [REDACTED] to communicate with Minor Victim DD.

- b. On October 14, 2021, AMIN, using Snapchat account [REDACTED] impersonated a social media influencer by sending Minor Victim DD a picture of the influencer that he claimed was a selfie.
- c. AMIN initially contacted Minor Victim DD after she commented on a Snapchat post by Minor Victim B. AMIN asked Minor Victim DD if she cared what happened to Minor Victim B, and she responded she did. AMIN told Minor Victim DD that she could switch spots with Minor Victim B and he would let Minor Victim B go. AMIN directed Minor Victim DD to tell Minor Victim B he would expose her if she did not contact him.
- d. AMIN forced Minor Victims DD and B to do a sexually explicit video call with him and to send him sexually explicit videos.

63. Minor Victim EE

- a. On August 20, 2021, AMIN created an email account and a Snapchat account that both used Minor Victim EE's name and that were nearly identical to Minor Victim EE's Snapchat username.
- b. In September 2021, AMIN used Snapchat account [REDACTED] to communicate with Minor Victim EE.

c. [REDACTED]



- d. On October 14, 2021, AMIN used Snapchat account [REDACTED] to communicate with Minor Victim EE. AMIN sent Minor Victim EE a screen capture from a video of child pornography depicting Minor Victim EE, demanding that she add him back on Snapchat or he would share nude images of her “again.”
- e. During the exploitation of Minor Victim EE, Co-conspirator 1 created a Dropbox link containing child pornography of Minor Victim EE.

Impact on Victims

- 64. Many minor victims threatened self-harm in their chats with AMIN, specifically referencing the emotional toll of AMIN’s demands.
- 65. On September 25, 2021, AMIN told Minor Victim G “One of the girls I did this to she even send me a vid of her slitting her throat.”

Distribution to Specific Recipients

66. Co-conspirator 2

- a. [REDACTED]



b.



67. Co-conspirator 3

a.



68. Co-conspirator 4

a.



69. Co-conspirator 5


a.



b.



COUNT 1

Paragraphs 1-69 of this Indictment are re-alleged and incorporated by reference herein. Between a date unknown to the Grand Jury, but no later than April 12, 2021 and continuing to the date of this Indictment, within the District of Alaska and elsewhere, the defendant, ZOBAIDUL AMIN, a/k/a 



[REDACTED]

[REDACTED] did knowingly conspire and agree with others known and unknown to the Grand Jury to knowingly employ, use, persuade, induce, entice, and coerce minors, namely, Minor Victims A, C, D, E, K, L, M, O, Q, R, T, U, V, X, Y, Z, AA, BB, CC, and DD with the intent that such minors engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate or foreign commerce, were produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and were actually transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce. All of which is in violation of 18 U.S.C. § 2251(a), (e).

COUNT 2

Paragraphs 1-69 of this Indictment are re-alleged and incorporated by reference herein. Between a date unknown to the Grand Jury, but no later than April 12, 2021, and continuing to the date of this Indictment, within the District of Alaska and elsewhere, the defendant, ZOBAIDUL AMIN, a/k/a [REDACTED]

[REDACTED]



[REDACTED] did knowingly conspire and agree with others known and unknown to the Grand Jury to knowingly distribute and receive by any means or facility of interstate and foreign commerce, including by computer, child pornography and material containing child pornography depicting Minor Victims A, B, C, D, E, F, G, H, I, K, L, M, N, O, Q, R, S, T, U, V, X, Y, Z, AA, BB, CC, DD, and EE which had been transported by any means and facility of interstate and foreign commerce, including by computer.

All of which is in violation of 18 U.S.C. § 2252A(a)(2), (b)(1).

COUNT 3

Paragraphs 1-69 of this Indictment are re-alleged and incorporated by reference herein. Between a date unknown to the Grand Jury, but no later than September 28, 2021, and continuing to the date of this Indictment, within the District of Alaska and elsewhere, the defendant, ZOBAIDUL AMIN, a/k/a [REDACTED]



[REDACTED]

[REDACTED] engaged in a child exploitation enterprise by violating Chapter 110 of Title 18 of the United States Code (except for sections 2257 and 2257A), specifically, distributing and receiving child pornography that has been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, as part of series of felony violations constituting three or more separate incidents and involving more than one victim, and committed the violations in concert with three or more other persons, those being violations of Title 18, United States Code, Section 2252A(a)(2).

All of which is in violation of 18 U.S.C. § 2252A(g)(1), (2).

COUNT 4

Paragraphs 1-69 of this Indictment are re-alleged and incorporated by reference herein. Between a date unknown to the Grand Jury, but no later than November 3, 2021, and continuing to the date of this Indictment, within the District of Alaska, the defendant, ZOBAIDUL AMIN, a/k/a [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] did knowingly employ, use, persuade, induce, entice, and coerce a minor, namely Minor Victim A, with the intent that Minor Victim A engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce and in or affecting interstate or foreign commerce, were produced using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and were actually transported and transmitted using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce.

All of which is in violation of 18 U.S.C. § 2251(a), (e).

COUNT 5

Paragraphs 1-69 of this Indictment are re-alleged and incorporated by reference herein. Between a date unknown to the Grand Jury, but no later than November 3, 2021, and continuing to the date of this Indictment, within the District of Alaska, the defendant, ZOBAIDUL AMIN, a/k/a [REDACTED]

[REDACTED]



did knowingly distribute and receive by any means or facility of interstate and foreign commerce, including by computer, child pornography and material containing child pornography, which had been transported by any means and facility of interstate and foreign commerce, including by computer.

All of which is in violation of 18 U.S.C. § 2252A(a)(2), (b)(1).

COUNT 6

Paragraphs 1-69 of this Indictment are re-alleged and incorporated by reference herein. Between a date unknown to the Grand Jury, but no later than October 19, 2021, and continuing to the date of this Indictment, within the District of Alaska and elsewhere, with the intent to kill, injure, harass, intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate Minor Victim A, the defendant, ZOBAIDUL AMIN,



[REDACTED]

[REDACTED] used any interactive computer service and electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, to knowingly engage in a course of conduct that placed Minor Victim A in reasonable fear of the death of and serious bodily injury to that person; and knowingly caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Minor Victim A.

All in violation of 18 U.S.C. §§ 2261A(2)(A), (B), and 2261(b)(5).

COUNTS 7-8

Paragraphs 1-69 of this Indictment are re-alleged and incorporated by reference herein. Between a date unknown to the Grand Jury, but no later than August 20, 2021, and continuing to the date of this Indictment, in Malaysia and elsewhere, in an offense begun and committed out of the jurisdiction of the United States, the defendant, ZOB AIDUL AMIN, a/k/a [REDACTED]

[REDACTED]




whom is expected to be first brought to and arrested the Southern District of New York, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: 18 U.S.C. § 1030, Unauthorized Access to a Protected Computer, knowing that that the means of identification belonged to another actual person.


All in violation of 18 U.S.C. § 1028A(a)(1).


<u>Count</u>	<u>Date</u>	<u>Means of Identification</u>
7	August 20, 2021	Name and username of Minor Victim EE (reference Paragraph 63.a of this Indictment)
8	October 14, 2021	Image of social media influencer (reference Paragraph 62.b of this Indictment)

COUNTS 9-13

Paragraphs 1-69 of this Indictment are re-alleged and incorporated by reference herein. Between a date unknown to the Grand Jury, but no later than September 19, 2021, and continuing to the date of this Indictment, within the District of Alaska and elsewhere, defendant ZOBAIDUL AMIN, a/k/a 






 devised and intended to devise a scheme – described in Paragraphs 1-69 of this Indictment – to defraud Minor Victims listed below, and to obtain property by means of materially false and fraudulent pretenses, representations and promises. On or about each of the dates set forth below, within in the District of Alaska and elsewhere, defendant ZOBAIDUL AMIN, for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds described below for each count, each transmission constituting a separate count:

<u>Count</u>	<u>Date</u>	<u>Description</u>
9	September 19, 2021	Obtaining by false pretenses child pornography of Minor Victim D (reference paragraph 39.d of this Indictment)
10	September 21, 2021	Obtaining by false pretenses child pornography of Minor Victim AA (reference paragraph 59.c of this Indictment)
11	October 14, 2021	Obtaining by false pretenses child pornography of Minor Victim DD (reference Paragraph 62.b of this Indictment)
12	November 3, 2021	Obtaining by false pretenses child pornography of Minor Victim V (reference paragraph 55.d of this Indictment)
13	November 11, 2021	Obtaining by false pretenses child pornography of Minor Victim A (reference Paragraph 36.g of this Indictment)

All in violation of 18 U.S.C. § 1343.

CRIMINAL FORFEITURE ALLEGATION 1

The allegations contained in Counts 1 - 5 are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 2253. Upon conviction of the offenses in violation of 18 U.S.C. § 2251(a), (e), 18 U.S.C.

§ 2252A(a)(2), (b)(1), 18 U.S.C. § 2252A(g)(1), (2) as set forth in Counts 1 – 5 of this Indictment, the defendant, ZOBAIDUL AMIN, a/k/a [REDACTED]

[REDACTED]

[REDACTED] shall forfeit to the United States pursuant to 18 U.S.C. § 2253 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 obtained, directly or indirectly, as a result of such violations.

All pursuant to 18 U.S.C. § 2253 and 28 U.S.C. § 2461(c), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Adam Alexander
ADAM ALEXANDER
United States of America
Assistant U.S. Attorney

s/ S. Lane Tucker
S. LANE TUCKER
United States of America
United States Attorney

DATE: 7/12/22