

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRIAN JEFFREY RAYMOND,

Defendant.

CRIMINAL NO.:

MAG NOs.: 1:20-mj-00261-ZMF

1:20-mj-00200-GMH

VIOLATIONS:

18 U.S.C. § 2242

18 U.S.C. § 1462

18 U.S.C. § 2428

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

GENERAL ALLEGATIONS

1. Defendant BRIAN JEFFREY RAYMOND is a United States citizen. From on or about August 21, 2018 until on or about June 1, 2020, RAYMOND was a United States government employee, working at the United States Embassy in Mexico City, Mexico. During that time, RAYMOND resided in an apartment in Mexico City, Mexico assigned to him by the United States government. RAYMOND's residence in Mexico City, Mexico is leased by the United States government for use by Embassy personnel assigned to diplomatic, consular, military, and other United States missions in Mexico City, Mexico. This residence falls within the Special Maritime and Territorial Jurisdiction of the United States, pursuant to Title 18, United States Code, Section 7(9).

2. From 2006 to May 31, 2020, RAYMOND went on dates with numerous adult women who he then recorded videos and photographed while they were unconscious and nude or partially nude without their consent, including Victim 2 through Victim 25. Most of these video recordings and photographs focused on the breast and genital area of these women, and the women were photographed and recorded while in a bed, on a couch, or on the floor. In many of the recordings and photographs, RAYMOND's hand can be seen touching the buttocks, breasts, and/or genital area of the women. RAYMOND engaged in this conduct in several different countries (including the United States) and did so at embassy-leased housing in multiple countries.

COUNT ONE

Sexual Abuse – 18 U.S.C. §§ 2242(2), 7(9)

The general allegations are incorporated herein by reference.

In or about May 2020, in Mexico City, Mexico, within the Special Maritime and Territorial Jurisdiction of the United States, the defendant, BRIAN JEFFREY RAYMOND, knowingly engaged in a sexual act with another person, Victim 7, who was, as the defendant well knew, at the time incapable of appraising the nature of the conduct, or physically incapable of declining participation in, and communicating unwillingness to engage in, the sexual act. The sexual act involved: (1) contact between RAYMOND's penis and Victim 7's vulva; all in violation of Title 18, United States Code, Sections 2242(2), 7(9).

COUNT TWO

Sexual Abuse – 18 U.S.C. §§ 2242(2), 7(9)

The general allegations are incorporated herein by reference.

In or about March 2020, in Mexico City, Mexico, within the Special Maritime and Territorial Jurisdiction of the United States, the defendant, BRIAN JEFFREY RAYMOND, knowingly engaged in a sexual act with another person, Victim 9, who was, as the defendant well

knew, at the time incapable of appraising the nature of the conduct, or physically incapable of declining participation in, and communicating unwillingness to engage in, the sexual act. The sexual act involved: (1) contact between RAYMOND's penis and Victim 9's vulva; all in violation of Title 18, United States Code, Sections 2242(2), 7(9).

COUNT THREE

Transportation of Obscene Material – 18 U.S.C. § 1462

The general allegations are incorporated herein by reference.

From 2006 to June 1, 2020, in the District of Columbia, the Special Maritime and Territorial Jurisdiction of the United States, and elsewhere, the defendant, BRIAN JEFFREY RAYMOND, brought into the United States and into any place subject to the jurisdiction thereof and knowingly used a common carrier and interactive computer service, for carriage in interstate and foreign commerce, obscene matters, that is, the depictions as described in the following chart:

Victim	Number of Photos and/or Videos	Location	Date Created	Description of Obscene Depiction
AV-2	33 photographs and 1 video 44 photographs and 7 videos	California Mexico	February 2, 2018 November 23, 2018	Close-up of breast with shirt pulled down by adult male hand Close-up of genitalia
AV-3	16 Photos and 3 Videos	Country 5 ¹	December 1, 2017	Close-up of bare breasts and genitalia
AV-4	8 Photos and 2 Videos	Virginia	May 14, 2017	Close-up of breasts with bra pulled down
AV-5	25 Photos and 10 Videos	Mexico	May 17, 2019	Close-up of adult male grabbing bare breast
AV-6	29 Photos and 6 Videos 35 Photos	Mexico Mexico	June 23, 2019 December 21, 2019	Close-up of bare breasts and genitalia, places her hand on her own breast and genitalia

¹ Countries 3, 4, 5, and 6 are known to the government and to the defendant.

AV-7	77 Photos and 4 Videos	Mexico	May 30, 2020	Close-up of genitalia, adult male straddling
AV-8	13 Photos and 1 Video	Mexico	March 27, 2020	Close-up of bare breast
AV-9	20 Photos and 15 Videos	Mexico	March 26, 2020	Close-up of adult male touching bare breast
AV-11	3 Videos	Mexico	May 11, 2019	Depicts her nude body with her leg draped over adult male whose penis is visible
AV-12	10 Photos	Mexico	September 15, 2018	Close-ups of bare breasts
AV-13	9 Photos	Country 5	November 28, 2017	Depicts close-up side view of bare breast
AV-15	4 Photos	Maryland	April 9, 2017	Depicts fully nude body and buttocks
AV-16	2 Photos	Virginia	November 5, 2016	Depicts bra pulled down exposing bare breasts
AV-17	6 Photos	Virginia	November 6, 2015	Close-up of male hand pulling down underwear to expose genitalia
AV-18	9 Photos	Virginia	November 1, 2015	Depicts bare breasts
AV-20	7 Photos	Country 6	November 2007	Depicts close-up of bare breasts
AV-22	7 Photos	Country 3	April 21, 2006	Depicts close ups of bare breasts and bare genitalia
AV-23	40 Photos	Country 6	December 2013	Depicts bare breasts and genitalia, body stretched and leg to one side; depicts close-up of genitalia
AV-24	27 Photos	Country 6	October 11-12, 2013	Depicts close-up of bare breasts and of bare genitalia
AV-25	6 Photos	Washington D.C.	December 25, 2015	Depicts bare genitalia and breasts

; all in violation of Title 18, United States Code, Section 1462.

FORFEITURE ALLEGATIONS

Criminal Forfeiture –18 U.S.C. § 2428; 18 U.S.C. § 2253(a)

As a result of the violation of 18 U.S.C. § 2242, as set forth in Counts One and Two of this Information, upon conviction the defendant shall forfeit to the United States: (1) any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation(s), and any property traceable to such property, pursuant to 18 U.S.C. § 2428; and (2) any property, real or personal, constituting or derived from, any proceeds that he obtained, directly or indirectly, as a result of such violation(s), or any property traceable to such property, pursuant to 18 U.S.C. § 2428.

As a result of the violation of 18 U.S.C. § 1462, as set forth in Count Three of this Information, upon conviction the defendant shall forfeit to the United States: (1) any visual depiction described in 18 U.S.C. § 1462, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Section 1462, pursuant to 18 U.S.C. § 2428; shall forfeit to the United States of America any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense, pursuant to 18 U.S.C. § 2428.

Such property includes, but is not limited to, a money judgment equal to an amount as proved in this matter, representing the total value of property subject to forfeiture from the defendant for his violation(s) of 18 U.S.C. § 2242 and/or 18 U.S.C. § 1462 as alleged in this Information. If the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property that cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by 18 U.S.C. § 2428 and/or 18 U.S.C. § 2461(c), to seek to forfeit any other property of the defendant up to the listed value.

CHANNING PHILLIPS
ACTING UNITED STATES ATTORNEY
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ACTING ASST. ATTORNEY GENERAL
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Date: May 28, 2021