ORIGINAL

FILED IN OPEN COURT
U.S.D.C. - Atlanta
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KEVIN P. WEIMER, Clerk
By: Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA *v.* RAJESH MOTIBHAI PATEL	Criminal Indictment No. 1:23CR133 **UNDER SEAL**

THE GRAND JURY CHARGES THAT:

Introduction

At all times relevant to this Indictment:

1. The Veterans Health Administration (VHA) was an agency of the United States that operated medical centers and provided health care to nine million enrolled veterans throughout the United States annually.

2. The Atlanta Veterans Affairs Medical Center (VAMC), located in Decatur, Georgia, was a medical center operated by the VHA.

3. Medical Doctors are physicians licensed to practice medicine in the United States.

4. Defendant RAJESH MOTIBHAI PATEL is a Medical Doctor who was employed at the VAMC as a Primary Care Physician between December 13, 2015, and February 4, 2020.

5. Defendant PATEL stopped providing patient care on February 4, 2020.

6. While employed at the VAMC, Defendant PATEL provided medical care to veterans, including S.J., S.A., C.B., and A.H.

7. Paragraphs 1 through 6 of this Indictment are realleged and incorporated into each count as though fully set forth therein.

Count One

Between on or about September 11, 2019, and on or about October 29, 2019, at the Atlanta Veterans Affairs Medical Center, in Decatur, DeKalb County, Georgia, within the Northern District of Georgia, the defendant, RAJESH MOTIBHAI PATEL, while acting under color of law, willfully deprived S.J. of liberty without due process of law, including the right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, by rubbing S.J.'s clitoris, groping S.J.'s bare breasts, and digitally penetrating S.J.'s vagina, all without S.J.'s consent and without a legitimate medical purpose, resulting in bodily injury to S.J.

All in violation of Title 18, United States Code, Section 242.

Count Two

Between on or about September 11, 2019, and on or about October 29, 2019, at the Atlanta Veterans Affairs Medical Center, in Decatur, DeKalb County, Georgia, within the Northern District of Georgia and the territorial jurisdiction of the United States, the defendant, RAJESH MOTIBHAI PATEL, knowingly engaged in sexual contact with S.J., without S.J.'s permission, by intentionally rubbing S.J.'s clitoris, groping S.J.'s bare breasts, and digitally penetrating S.J.'s vagina.

All in violation of Title 18, United States Code, Section 2244(b).

Count Three

On or about November 20, 2019, at the Atlanta Veterans Affairs Medical Center, in Decatur, DeKalb County, Georgia, within the Northern District of Georgia, the defendant, RAJESH MOTIBHAI PATEL, while acting under color of law, willfully deprived S.A. of liberty without due process of law, including the right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, by rubbing S.A.'s clitoris, rubbing S.A.'s breasts, digitally penetrating S.A.'s vagina, and making sexually suggestive comments to S.A., all without S.A.'s consent and without a legitimate medical purpose.

All in violation of Title 18, United States Code, Section 242.

Count Four

On or about November 20, 2019, at the Atlanta Veterans Affairs Medical Center, in Decatur, DeKalb County, Georgia, within the Northern District of Georgia and the territorial jurisdiction of the United States, the defendant, RAJESH MOTIBHAI PATEL, knowingly engaged in sexual contact with S.A., without S.A.'s permission, by intentionally rubbing S.A.'s clitoris, rubbing S.A.'s breasts, and digitally penetrating S.A.'s vagina.

All in violation of Title 18, United States Code, Section 2244(b).

Count Five

Between on or about September 24, 2019, and on or about December 19, 2019, at the Atlanta Veterans Affairs Medical Center, in Decatur, DeKalb County, Georgia, within the Northern District of Georgia, the defendant, RAJESH MOTIBHAI PATEL, while acting under color of law, willfully deprived C.B. of

liberty without due process of law, including the right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, by squeezing C.B.'s buttocks and touching C.B.'s clitoris, all without C.B.'s consent and without a legitimate medical purpose.

All in violation of Title 18, United States Code, Section 242.

Count Six

From on or about September 24, 2019, to on or about December 19, 2019, at the Atlanta Veterans Affairs Medical Center, in Decatur, DeKalb County, Georgia, within the Northern District of Georgia and the territorial jurisdiction of the United States, the defendant, RAJESH MOTIBHAI PATEL, knowingly engaged in sexual contact with C.B., without C.B.'s permission, by intentionally squeezing C.B.'s buttocks and rubbing C.B.'s clitoris.

All in violation of Title 18, United States Code, Section 2244(b).

Count Seven

On or about January 14, 2020, at the Atlanta Veterans Affairs Medical Center, in Decatur, DeKalb County, Georgia, within the Northern District of Georgia, the defendant, RAJESH MOTIBHAI PATEL, while acting under color of law, willfully deprived A.H. of liberty without due process of law, including the right to bodily integrity, a right secured and protected by the Constitution and laws of the United States, by rubbing A.H.'s vagina and clitoris, squeezing A.H.'s nipple, and digitally penetrating A.H.'s vagina, all without A.H.'s consent and without a legitimate medical purpose.

All in violation of Title 18, United States Code, Section 242.

Count Eight

On or about January 14, 2020, at the Atlanta Veterans Affairs Medical Center, in Decatur, DeKalb County, Georgia, within the Northern District of Georgia and the territorial jurisdiction of the United States, the defendant, RAJESH MOTIBHAI PATEL, knowingly engaged in sexual contact with A.H., without A.H.'s permission, by intentionally rubbing A.H.'s vagina and clitoris, squeezing A.H.'s nipple, and digitally penetrating A.H.'s vagina.

All in violation of Title 18, United States Code, Section 2244(b).

A True BILL

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