

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. **11-20557 CR-MOORE**

18 U.S.C. § 371
18 U.S.C. § 1591(a)(1) and (b)(1)
18 U.S.C. § 1591(a)(2) and (b)(1)
18 U.S.C. § 1594(c)
18 U.S.C. § 1594(a)
18 U.S.C. § 1594(d)
21 U.S.C. § 841(b)(2)
21 U.S.C. § 853

/TORRES

FILED by _____ D.C.
AUG 16 2011
STEVEN M. LARIMORE CLERK U. S. DIST. CT S. D. of FLA. - MIAMI

UNITED STATES OF AMERICA

vs.

LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore," and
EMERSON CALLUM
a/k/a "Jah-T,"

Defendants,

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

1. www.ModelMayhem.com was a social networking website tailored to men and

women who were interested in pursuing a career in the modeling and acting industries.

2. www.Blackplanet.com was a social networking website owned and operated by InteractiveOne, a company headquartered in the State of New York.

3. Miami Vibes Enterprises Inc. ("Miami Vibes") was incorporated in the State of Florida in 2005 and was located at 3950 South State Road 7, Suite 209, Miramar, Florida.

4. Miami Vibes produced adult pornography in South Florida and distributed it over the Internet and to local businesses.

5. **EMERSON CALLUM** was a resident of Miami-Dade County and President and sole Director of Miami Vibes.

6. **LAVONT FLANDERS, JR.**, was a resident of Miami-Dade County and a business associate of **EMERSON CALLUM**'s.

7. Alprazolam, commonly referred to as "Xanax," was a Schedule IV controlled substance in the benzodiazepine class.

COUNT 1

8. Paragraphs 1 through 7 of the General Allegations Section of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

9. Beginning at least as early as May 2006, the exact date being unknown to the Grand Jury, and continuing through on or about July 18, 2007, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"

a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"
and
EMERSON CALLUM
a/k/a "Jah-T,"

did knowingly combine, conspire, confederate, and agree with each other and others known and unknown to the Grand Jury to commit offenses against the United States, that is, to:

(1) in and affecting interstate and foreign commerce, to recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, knowing that fraud would be used to cause such person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1); and

(2) knowingly benefit, financially and by receiving anything of value, from participation in a venture which has, in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, in violation of paragraph (1) of Title 18, United States Code, Section 1591(a), knowing that fraud would be used to cause that person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(2) and (b)(1).

OBJECT OF THE CONSPIRACY

10. It was the object of the conspiracy for the defendants to enrich themselves unlawfully by selling copies of video recordings that they created by luring women, under false pretenses, to audition for what the women believed would be legitimate modeling or acting contracts, and then

having them consume alcoholic beverages which, unbeknownst to the women, contained Xanax, to get the women to engage in sexual acts, which the defendants video-recorded.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants sought to accomplish the purpose of the conspiracy included, among other things, the following:

11. **FLANDERS** would search for women on www.ModelMayhem.com and www.Blackplanet.com by looking at the photographs and profiles of women who were interested in pursuing careers in acting or modeling.

12. **FLANDERS**, using a false and fraudulent identity and pretending to be associated with a well-known modeling, acting, or commercial business, would contact the women, typically by sending emails to their accounts on either www.ModelMayhem.com or www.Blackplanet.com.

13. In these emails, **FLANDERS**, using his false and fraudulent identity, would falsely and fraudulently inform the women that the company with which he claimed to be associated was interested in having them travel to South Florida to audition for a potentially lucrative acting or modeling contract with the company.

14. If a woman was interested in the audition, **FLANDERS**, using a second false and fraudulent identity, would contact her over the phone and encourage her to meet him for the audition.

15. At the "audition," **FLANDERS**, still using a false and fraudulent identity, would provide the women with alcoholic beverages that contained Xanax, which **FLANDERS** told them to drink as part of the audition. The women did not know that the drinks contained Xanax.

16. After the women had ingested the Xanax, **FLANDERS** and **CALLUM** would have them sign Model Release Forms.

17. **FLANDERS**, while filming the women, would ask them whether they were under the influence of any drugs or alcohol, knowing, however, that they had already consumed the alcoholic beverages he had given them, which contained Xanax.

18. **CALLUM** witnessed the women deny that they were under the influence of any drugs or alcohol.

19. **CALLUM** would engage in sexual acts with the women.

20. **FLANDERS** would film **CALLUM** engaging in sexual acts with the women.

21. **CALLUM**, through Miami Vibes, would sell copies of the videos over the Internet and to local businesses.

22. **CALLUM** included in the video-recordings he sold footage of the women denying that they were under the influence of any drugs or alcohol, knowing, however, that the women had been given alcoholic beverages.

23. **FLANDERS** and **CALLUM** did not pay any of the women any money for the filming or distribution of these video-recordings.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish the objects thereof, at least one of the co-conspirators committed and caused to be committed, in the Southern District of Florida, and elsewhere, at least one of the following overt acts, among others:

1. On or about May 16, 2006, **FLANDERS**, falsely and fraudulently representing himself to be "Antone Cobe," contacted I.H. by telephone and asked her to travel to South Florida for a modeling audition.

2. On or about May 17, 2006, **FLANDERS**, falsely and fraudulently representing

himself to be “Antone Cobe,” provided I.H. with a series of alcoholic beverages, which **FLANDERS** told I.H. to drink as part of the modeling audition, but which, unbeknownst to I.H., contained Xanax.

3. On or about May 17, 2006, **CALLUM** engaged in sexual acts with I.H.

4. On or about May 17, 2006, **FLANDERS**, falsely and fraudulently representing himself to be “Antone Cobe,” filmed **CALLUM** engaging in sexual acts with I.H.

5. **CALLUM**, through “Miami Vibes,” sold copies of the videos of himself engaged in sexual acts with I.H. over the Internet and to local businesses.

6. On June 30, 2006, **FLANDERS**, falsely and fraudulently representing himself to be “Larry,” contacted C.K. by telephone and asked her to meet him in South Florida for a modeling audition.

7. On or about June 30, 2006, **CALLUM** engaged in sexual acts with C.K.

8. On or about June 30, 2006, **FLANDERS**, falsely and fraudulently representing himself to be “Larry,” filmed **CALLUM** engaging in sexual acts with C.K.

9. **CALLUM**, through “Miami Vibes,” sold copies of the videos of himself engaged in sexual acts with C.K. over the Internet and to local businesses.

10. On or about August 17, 2006, **FLANDERS**, falsely and fraudulently representing himself to be “Shannon,” sent an email to A.T., in which he falsely and fraudulently pretended to be a female singer named Shannon who offered to put A.T. in touch with the agent who had landed Shannon a lucrative contract.

11. On or about August 18, 2006, **FLANDERS**, falsely and fraudulently representing himself to be “Larry Griffin,” contacted A.T. by telephone and asked her to travel to South Florida for a modeling audition.

12. On or about August 20, 2006, **FLANDERS**, falsely and fraudulently representing himself to be "Larry Griffin," provided A.T. with a series of alcoholic beverages, which **FLANDERS** told A.T. to drink as part of the modeling audition, but which, unbeknownst to A.T., contained Xanax.

13. On or about August 20, 2006, **CALLUM** falsely and fraudulently representing himself to be to A.T. as an agent for Bacardi and falsely and fraudulently told her that he was there to shoot a Bacardi commercial with her.

14. On or about August 20, 2006, **CALLUM** engaged in sexual acts with A.T.

15. On or about August 20, 2006, **FLANDERS**, falsely and fraudulently representing himself to be "Larry Griffin," filmed **CALLUM** engaging in sexual acts with A.T.

16. **CALLUM**, through "Miami Vibes," sold copies of the videos of himself engaged in sexual acts with A.T. over the Internet.

17. On or about November 15, 2006, **FLANDERS** contacted S.B. by telephone and asked her to meet him for a modeling audition.

18. On or about November 15, 2006, **FLANDERS** provided S.B. with a series of alcoholic beverages, which **FLANDERS** told S.B. to drink as part of the modeling audition, but which, unbeknownst to S.B., contained Xanax.

19. On or about November 15, 2006, **CALLUM** engaged in sexual acts with S.B.

20. On or about November 15, 2006, **FLANDERS** filmed **CALLUM** engaging in sexual acts with S.B.

21. **CALLUM**, himself and through "Miami Vibes," sold videos of himself engaged in sexual acts with I.H. over the Internet and to local businesses.

22. On or about March 16, 2007, **FLANDERS**, falsely and fraudulently representing himself to be “Karen Watson,” sent an email to C.S., in which he falsely and fraudulently pretended to be a female employee of a modeling agency whose website was www.olympicmodels.com, and offered to put C.S. in touch with a modeling scout.

23. On or about March 18, 2007, **FLANDERS**, falsely and fraudulently representing himself to be “Darius,” contacted C.S. by telephone and asked her to travel to South Florida for a modeling audition.

24. On or about March 19, 2007, **CALLUM** engaged in sexual acts with C.S.

25. On or about March 19, 2007, **FLANDERS**, falsely and fraudulently representing himself to be “Darius,” filmed **CALLUM** engaging in sexual acts with C.S.

26. **CALLUM**, himself and through “Miami Vibes,” sold copies of the videos of himself engaged in sexual acts with C.S. over the Internet and to local businesses.

27. On or about March 23, 2007, **FLANDERS**, falsely and fraudulently representing himself to be “Karen Watson,” sent an email to J.H., in which he offered to put J.H. in touch with a modeling and acting scout.

28. On or about March 23, 2007, **FLANDERS**, falsely and fraudulently representing himself to be “Ladarius Cobe,” contacted J.H. by telephone and asked her to travel to South Florida for a modeling and acting audition.

29. On or about April 13, 2007, **FLANDERS**, falsely and fraudulently representing himself to be “Ladarius Cobe,” provided J.H. with a series of alcoholic beverages, which **FLANDERS** told J.H. to drink as part of the modeling and acting audition, but which, unbeknownst to J.H., contained Xanax.

30. On or about May 30, 2007, **FLANDERS**, falsely and fraudulently representing himself to be “Karen Watson,” sent an email to S.C., in which he told S.C. that he could help her take her look to new places and offered to put S.C. in touch with a modeling scout.

31. On or about May 30, 2007, **FLANDERS**, falsely and fraudulently representing himself to be “Karen Watson,” sent an email to S.C., in which he falsely represented that the modeling scout worked for a company whose website was www.bacardilive.com.

32. On or about May 31, 2007, **FLANDERS**, falsely and fraudulently representing himself to be “Darius Cove,” contacted S.C. by telephone and asked her to travel to South Florida for a modeling audition.

33. On or about June 2, 2007, **FLANDERS**, falsely and fraudulently representing himself to be “Darius Cove,” provided S.C. with a series of alcoholic beverages, which **FLANDERS** told S.C. to drink as part of the modeling audition, but which, unbeknownst to S.C., contained Xanax.

All in violation of Title 18, United States Code, Section 371.

Count 2

From in or around early May 2006, the exact date being unknown to the Grand Jury, through May 17, 2006, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

LAVONT FLANDERS, JR.
a/k/a “Antone Cobe”
a/k/a “Shannon”
a/k/a “Larry Griffin”
a/k/a “Karen Watson”
a/k/a “Darius”
a/k/a “Ladarius Cobe”
a/k/a “Darius Cove”
a/k/a “Errick Farmer”

**a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"
and
EMERSON CALLUM
a/k/a "Jah-T,"**

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, and obtain by any means a person, that is, I.H., knowing that fraud would be used to cause such person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1), and 2.

COUNT 3

On or about May 17, 2006, in Miami-Dade County, in the Southern District of Florida, the defendant,

**LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(b)(2).

Pursuant to Title 21, United States Code, Section 841(b)(2), it is further alleged that this violation involved a mixture and substance containing a detectable amount of Alprazolam, commonly referred to as "Xanax," a Schedule IV controlled substance.

Count 4

Beginning at least as early as on or about May 17, 2006, up to and including the date of the return of this Indictment, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"
and
EMERSON CALLUM
a/k/a "Jah-T,"

did knowingly benefit, financially and by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1) of Title 18, United States Code, Section 1591(a), as set forth in Count 2 of this Indictment, knowing that fraud would be used to cause a person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(2), (b)(1), and 2.

Count 5

On or about June 30, 2006, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"

**a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"
and
EMERSON CALLUM
a/k/a "Jah-T,"**

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, and obtain by any means a person, that is, C.K., knowing that fraud would be used to cause such person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1), and 2.

Count 6

Beginning as early as on or about June 30, 2006, up to and including the date of the return of this Indictment, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

**LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"
and
EMERSON CALLUM**

a/k/a “Jah-T,”

did knowingly benefit, financially and by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1) of Title 18, United States Code, Section 1591(a), as described in Count 5 of this Indictment, knowing that fraud would be used to cause a person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(2), (b)(1), and 2.

Count 7

Beginning on or about August 17, 2006, and continuing through on or about August 20, 2006, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

**LAVONT FLANDERS, JR.
a/k/a “Antone Cobe”
a/k/a “Shannon”
a/k/a “Larry Griffin”
a/k/a “Karen Watson”
a/k/a “Darius”
a/k/a “Ladarius Cobe”
a/k/a “Darius Cove”
a/k/a “Errick Farmer”
a/k/a “Eric Lawson”
a/k/a “Erick Liwson”
a/k/a “Tina Clintmore,”
and
EMERSON CALLUM
a/k/a “Jah-T,”**

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, and obtain by any means a person, that is, A.T., knowing that fraud would be used to cause such person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1), and 2.

COUNT 8

On or about August 20, 2006, in Miami-Dade County, in the Southern District of Florida,
the defendant,

**LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(b)(2).

Pursuant to Title 21, United States Code, Section 841(b)(2), it is further alleged that this violation involved a mixture and substance containing a detectable amount of Alprazolam, commonly referred to as "Xanax," a Schedule IV controlled substance.

Count 9

Beginning as early as on or about August 20, 2006, up to and including the date of the return of this Indictment, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

**LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"**

**a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"
and
EMERSON CALLUM
a/k/a "Jah-T,"**

did knowingly benefit, financially and by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1) of Title 18, United States Code, Section 1591(a), as set forth in Count 7 of this Indictment, knowing that fraud would be used to cause a person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(2), (b)(1), and 2.

Count 10

In or around November 2006, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

**LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"
and
EMERSON CALLUM
a/k/a "Jah-T,"**

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport,

provide, and obtain by any means a person, that is, S.B., knowing that fraud would be used to cause such person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1), and 2.

COUNT 11

On or about November 15, 2006, in Miami-Dade County, in the Southern District of Florida,
the defendant,

**LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(b)(2).

Pursuant to Title 21, United States Code, Section 841(b)(2), it is further alleged that this violation involved a mixture and substance containing a detectable amount of Alprazolam, commonly referred to as "Xanax," a Schedule IV controlled substance.

Count 12

Beginning as early as on or about November 15, 2006, up to and including the date of the return of this Indictment, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"
and
EMERSON CALLUM
a/k/a "Jah-T,"

did knowingly benefit, financially and by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1) of Title 18, United States Code, Section 1591(a), as set forth in Count 10 of this Indictment, knowing that fraud would be used to cause a person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(2), (b)(1), and 2.

Count 13

Beginning on or about March 16, 2007, and continuing through on or about March 19, 2007, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"

**a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"
and
EMERSON CALLUM
a/k/a "Jah-T,"**

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, and obtain by any means a person, that is, C.S., knowing that fraud would be used to cause such person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1), and 2.

Count 14

Beginning as early as March 19, 2007, up to and including the date of the return of this Indictment, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

**LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"
and
EMERSON CALLUM
a/k/a "Jah-T,"**

did knowingly benefit, financially and by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1) of Title 18, United States Code,

Section 1591(a), knowing that fraud would be used to cause a person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(2), (b)(1), and 2.

COUNT 15

On or about April 13, 2007, in Miami-Dade County, in the Southern District of Florida, the defendant,

**LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(b)(2).

Pursuant to Title 21, United States Code, Section 841(b)(2), it is further alleged that this violation involved a mixture and substance containing a detectable amount of Alprazolam, commonly referred to as "Xanax," a Schedule IV controlled substance.

COUNT 16

On or about June 2, 2007, in Miami-Dade County, in the Southern District of Florida, the defendant,

**LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"**

**a/k/a “Karen Watson”
a/k/a “Darius”
a/k/a “Ladarius Cobe”
a/k/a “Darius Cove”
a/k/a “Errick Farmer”
a/k/a “Eric Lawson”
a/k/a “Erick Liwson”
a/k/a “Tina Clintmore,”**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(b)(2).

Pursuant to Title 21, United States Code, Section 841(b)(2), it is further alleged that this violation involved a mixture and substance containing a detectable amount of Alprazolam, commonly referred to as “Xanax,” a Schedule IV controlled substance.

Count 17

Beginning at least as early as on or about May 3, 2010, and continuing up to and including the date of the return of this Indictment, the exact date being unknown to the Grand Jury, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

**LAVONT FLANDERS, JR.
a/k/a “Antone Cobe”
a/k/a “Shannon”
a/k/a “Larry Griffin”
a/k/a “Karen Watson”
a/k/a “Darius”
a/k/a “Ladarius Cobe”
a/k/a “Darius Cove”
a/k/a “Errick Farmer”
a/k/a “Eric Lawson”
a/k/a “Erick Liwson”
a/k/a “Tina Clintmore,”
and
EMERSON CALLUM
a/k/a “Jah-T,”**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to:

(1) knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, knowing, and in reckless disregard of the fact, that fraud would be used to cause such person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1); and

(2) knowingly benefit, financially and by receiving anything of value, from participation in a venture which has, in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, in violation of paragraph (1) of Title 18, United States Code, Section 1591(a), knowing that fraud would be used to cause that person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(2) and (b)(1);

All in violation of Title 18, United States Code, Section 1594(c).

Count 18

Beginning on or about May 3, 2010, and continuing through on or about May 17, 2010, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

LAVONT FLANDERS, JR.

a/k/a "Antone Cobe"

a/k/a "Shannon"

a/k/a "Larry Griffin"

a/k/a "Karen Watson"

a/k/a "Darius"

a/k/a "Ladarius Cobe"

a/k/a "Darius Cove"

a/k/a "Errick Farmer"

**a/k/a “Eric Lawson”
a/k/a “Erick Liwson”
a/k/a “Tina Clintmore,”
and
EMERSON CALLUM
a/k/a “Jah-T,”**

did knowingly attempt to, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, and obtain by any means a person, that is, L.W., knowing, and in reckless disregard of the fact, that fraud would be used to cause such person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1); in violation of Title 18, United States Code, Sections 1594(a) and 2.

Count 19

Beginning as early as on or about May 3, 2010, and continuing through on or about May 17, 2010, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

**LAVONT FLANDERS, JR.
a/k/a “Antone Cobe”
a/k/a “Shannon”
a/k/a “Larry Griffin”
a/k/a “Karen Watson”
a/k/a “Darius”
a/k/a “Ladarius Cobe”
a/k/a “Darius Cove”
a/k/a “Errick Farmer”
a/k/a “Eric Lawson”
a/k/a “Erick Liwson”
a/k/a “Tina Clintmore,”
and
EMERSON CALLUM
a/k/a “Jah-T,”**

did knowingly attempt to benefit, financially and by receiving anything of value, from participation

in a venture which has, in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, and obtained by any means a person, that is, L.W., in violation of paragraph (1) of Title 18, United States Code, Section 1591(a), knowing, and in reckless disregard of the fact, that fraud would be used to cause that person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(2), (b)(1); in violation of Title 18, United States Code, Sections 1594(a) and 2.

Count 20

Beginning on or about February 8, 2011, and continuing through on or about February 18, 2011, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"
and
EMERSON CALLUM
a/k/a "Jah-T,"

did knowingly attempt to, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, and obtain by any means a person, that is, L.H., knowing, and in reckless disregard of the fact, that fraud would be used to cause such person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1); in violation of Title 18,

United States Code, Sections 1594(a) and 2.

COUNT 21

On or about February 17, 2011, in Miami-Dade County, in the Southern District of Florida,
the defendant,

LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"
a/k/a "Karen Watson"
a/k/a "Darius"
a/k/a "Ladarius Cobe"
a/k/a "Darius Cove"
a/k/a "Errick Farmer"
a/k/a "Eric Lawson"
a/k/a "Erick Liwson"
a/k/a "Tina Clintmore,"

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(b)(2).

Pursuant to Title 21, United States Code, Section 841(b)(2), it is further alleged that this violation involved a mixture and substance containing a detectable amount of Alprazolam, commonly referred to as "Xanax," a Schedule IV controlled substance.

Count 22

Beginning as early as on or about February 8, 2011, and continuing through on or about February 18, 2011, in Miami-Dade and Broward Counties, in the Southern District of Florida, and elsewhere, the defendants,

LAVONT FLANDERS, JR.
a/k/a "Antone Cobe"
a/k/a "Shannon"
a/k/a "Larry Griffin"

**a/k/a “Karen Watson”
a/k/a “Darius”
a/k/a “Ladarius Cobe”
a/k/a “Darius Cove”
a/k/a “Errick Farmer”
a/k/a “Eric Lawson”
a/k/a “Erick Liwson”
a/k/a “Tina Clintmore,”
and
EMERSON CALLUM
a/k/a “Jah-T,”**

did knowingly attempt to benefit, financially and by receiving anything of value, from participation in a venture which has, in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, and obtained by any means a person, that is, L.H., in violation of paragraph (1) of Title 18, United States Code, Section 1591(a), knowing, and in reckless disregard of the fact, that fraud would be used to cause that person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(2), (b)(1); in violation of Title 18, United States Code, Sections 1594(a) and 2.

CRIMINAL FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are re-alleged and fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which one or more of the defendants has an interest.


2. Upon conviction of any of the violations alleged in Counts 2, 4-7, 9-10, 12-14, and 17 of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), (1) any property, real or personal, used or intended to be used to commit or to facilitate the commission of any such violation; and (2) any property, real or personal, which constitutes or is derived from proceeds traceable to any such violation.

3. Upon conviction of any of the violations alleged in Counts 3, 8, 11, 15, 16, and 18 of this Indictment, the defendant, **LAVONT FLANDERS, JR., a/k/a “Antone Cobe,” a/k/a “Shannon,” a/k/a “Larry Griffin,” a/k/a “Karen Watson,” a/k/a “Darius,” a/k/a “Ladarius Cobe,” a/k/a “Darius Cove,” a/k/a “Errick Farmer,” a/k/a “Eric Lawson,” a/k/a “Erick Liwson, a/k/a “Tina Clintmore,”** shall forfeit to the United States any property (1) constituting, or derived from, any proceeds which the defendant obtained, directly or indirectly, as a result of such violation, and (2) any property which the defendant used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation, pursuant to Title 21, United States Code, Sections 853(a)(1) and (a)(2).

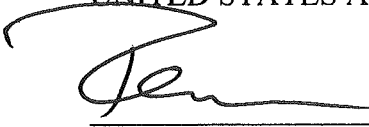
All pursuant to Title 18, United States Code, Sections 1594(d) and 982(a)(2)(A), and the procedures set forth at Title 21, United States Code, Section 853, made applicable here by Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON _____



WIFREDO A. FERRER
UNITED STATES ATTORNEY



ROY K. ALTMAN
ASSISTANT UNITED STATES ATTORNEY



BARBARA A. MARTINEZ
ASSISTANT UNITED STATES ATTORNEY