

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CR 13-213 JNE/AJB

UNITED STATES OF AMERICA,)	INDICTMENT
)	
Plaintiff,)	18 U.S.C. § 2423
)	
v.)	
)	
1. BRANDON LYNN GILMORE,)	
2. DOMINIQUE ALEXANDRA)	
MCKEE, and)	
3. ANGELICA MARIE CARTER,)	
)	
Defendants.)	

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy to Facilitate Travel in Interstate Commerce to Engage in Prostitution)

On or about July 12, 2013, in the State and District of Minnesota and elsewhere,
the defendants,

**BRANDON LYNN GILMORE,
DOMINIQUE ALEXANDRA MCKEE, and
ANGELICA MARIE CARTER,**

for the purpose of commercial advantage and private financial gain, conspired to arrange,
induce, procure and facilitate the travel of a person, namely, JANE DOE, knowing the
such person was traveling in interstate or foreign commerce for the purpose of engaging
in illicit sexual conduct, all in violation of Title 18, United States Code Sections 2423 (d)
and (e).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON

