IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 13-14

v. : DATE FILED: January 10, 2012

JUSTIN WILLIAMS, : VIOLATIONS:

a/k/a "New York Ice," 18 U.S.C. § 1591 (sex trafficking by

a/k/a "Pimp Juice" : force - 2 counts);

18 U.S.C. § 1594(a) (attempt)

: 18 U.S.C. § 2 (aiding and abetting)

: Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

- 1. At all times material to this indictment, defendant, JUSTIN WILLIAMS, a/k/a "New York Ice," a/k/a "Pimp Juice," was the operator of a prostitution venture in Philadelphia, Pennsylvania, and elsewhere.
- 2. As part of this venture, defendant JUSTIN WILLIAMS, a/k/a "New York Ice," a/k/a "Pimp Juice," recruited young females to work as prostitutes in his business.

 Defendant JUSTIN WILLIAMS engaged in acts of physical violence to maintain the participation of females in his prostitution business.
- 3. As part of this venture, defendant JUSTIN WILLIAMS, a/k/a "New York Ice," a/k/a "Pimp Juice," created Internet advertisements in which he advertised various females as available for purchase for purposes of prostitution. These advertisements featured pictures of the females, either scantily clad, or topless with their hands covering their breasts, the price, and a phone number to call to arrange a meeting with a female.

Between on or about November 7, 2011, through on or about January 31,
 2012, in the Eastern District of Pennsylvania and elsewhere, defendant

JUSTIN WILLIAMS, a/k/a "New York Ice," a/k/a "Pimp Juice,"

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Person 1, whose identity is known to the Grand Jury, and benefitted financially from participation in a venture which engaged in the knowing recruitment, enticement, harboring, transporting, providing, obtaining, and maintaining of Person 1, and attempted to do so. At the time that defendant JUSTIN WILLIAMS did this, he knew and acted in reckless disregard of the fact that force, threats of force, fraud, coercion, and any combination of such means would be used to cause Person 1 to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1591 and 1594(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

- 1. The allegations of Paragraphs 1 through 3 of Count One are incorporated by reference.
- Between on or about March 17, 2011, through on or about May 31, 2012,
 in the Eastern District of Pennsylvania and elsewhere, defendant

JUSTIN WILLIAMS, a/k/a "New York Ice," a/k/a "Pimp Juice,"

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Person 2, whose identity is known to the Grand Jury, and benefitted financially from participation in a venture which engaged in the knowing recruitment, enticement, harboring, transporting, providing, obtaining, and maintaining of Person 2, and attempted to do so. At the time that defendant JUSTIN WILLIAMS did this, he knew and acted in reckless disregard of the fact that force, threats of force, fraud, coercion, and any combination of such means would be used to cause Person 2 to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1591 and 1594(a).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1591, set forth in this Indictment, defendant

JUSTIN WILLIAMS, a/k/a "New York Ice," a/k/a "Pimp Juice,"

shall forfeit to the United States of America:

- (a) any property, real or personal, used or intended to be used to commit, or to facilitate the commission of such violations; and
- (b) any property, real or personal, constituting or derived from, any proceeds obtained directly or indirectly as a result of such violations.
- 2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:
 - (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred or sold to, or deposited with, a third party;
 - (c) has been placed beyond the jurisdiction of the Court;
 - (d) has been substantially diminished in value; or
 - (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 246	51(c) and Title 18, United
States Code, Sections 1594(d) and (e).	
A TRUE BILL:	
FOREPERSON	