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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

DeWAYNE EUGENE HOPKINS, and  
JULIA JANE YOUNG

Defendants.

INDICTMENT

18 U.S.C. § 371 (Conspiracy to  
Commit Sex Trafficking of Children)

**SEALED  
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Case: 2:09-cr-00148  
Assigned To : Stewart, Ted  
Assign. Date : 3/18/2009  
Description: USA v.

A. INTRODUCTION

At all times relevant to this Indictment:

1. Defendant DeWAYNE EUGENE HOPKINS was a resident of Salt Lake County, Utah.
2. Defendant JULIA JANE YOUNG was a resident of Salt Lake County, Utah.
3. D.A. was a resident of Salt Lake County, Utah, and a juvenile female who had

not yet reached the age of eighteen (18).

4. H.S. was a resident of Salt Lake County, Utah, and a juvenile female who had not yet reached the age of eighteen (18).

5. M.H. was a resident of Salt Lake County, Utah, and a juvenile female who had not yet reached the age of eighteen (18).

6. The three juveniles noted in paragraphs 3, 4, and 5 are collectively referred to throughout the Indictment as "the minor females."

7. Craigslist.com is a internet-based website that, among other things, advertises the sell and purchases of goods and services.

8. Backpage.com is a internet-based website that, among other things, advertises the sell and purchases of goods and services.

9. Cityvibe.com is a internet-based website that, among other things, advertises the sell and purchases of goods and services.

10. Best Western is a nation-wide hotel chain that operates a hotel at 280 West 7200 South, Midvale, Utah (hereinafter "Best Western hotel").

11. A "commercial sex act," as defined by 18 U.S.C. § 1591(c)(1), is any sex act on account of which anything of value is given to or received by any person.

**Count 1**  
**18 U.S.C. § 371**  
**Conspiracy to Commit**  
**Sex Trafficking of Children**

12. Beginning on or about May 1, 2008, and continuing through on or about May 21, 2008, in the Central Division of the District of Utah,

DeWAYNE EUGENE HOPKINS and  
JULIA JANE YOUNG,

Defendants herein, conspired and agreed with each other to recruit, entice, harbor, transport, provide and obtain by any means minor females knowing that the minor females had not attained the age of 18 years and would be caused to engage in commercial sex acts, in violation of 18 U.S.C. § 1591(a)(1), and punishable according to 18 U.S.C. § 1591(b)(2).

B. OBJECT OF THE CONSPIRACY

13. The object of the conspiracy was for Defendants to profit financially from commercial sex acts performed by the minor females.

C. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

14. The object of the conspiracy was to be accomplished, in substance, as follows:

15. Defendants recruited the minor females to work as escorts giving “erotic massages” with “happy endings”- a sex act ending in ejaculation.

16. Defendants took photographs of the minor females and published them on Internet sites such as craigslist.com, backpage.com, and cityvibe.com to advertise the

“massages.”

17. Defendant DeWAYNE EUGENE HOPKINS rented hotel rooms, which was a staging area for the minor females to engage in commercial sex acts.

18. Defendant DeWAYNE EUGENE HOPKINS gave the minor females instructions regarding how much to charge for certain sex acts.

19. Defendant JULIA JANE YOUNG received telephone calls from customers and then called the minor females to arrange appointments between the minor females and the customers.

20. Defendant DeWAYNE EUGENE HOPKINS drove the minor females to the Best Western hotel where they worked as escorts and engaged in sexual acts with customers.

21. Defendant DeWAYNE EUGENE HOPKINS collected the money the minor females earned performing commercial sex acts.

22. Defendants DeWAYNE EUGENE HOPKINS and JULIA JANE YOUNG directed the minor females to recruit other females to work for them as escorts.

C. OVERT ACTS

23. In furtherance of the conspiracy and to accomplish the objects of the conspiracy, Defendants, acting either individually or collectively, committed various overt acts within the Central District of Utah, including but not limited to the following:

24. Beginning on or about April 1, 2008, and continuing through on or about May 21, 2008, Defendants DeWAYNE EUGENE HOPKINS and JULIA JANE YOUNG recruited and encouraged D.A. to work for them as an escort performing commercial sex acts.

25. Beginning on or about April 1, 2008, and continuing through on or about May 21, 2008, Defendants DeWAYNE EUGENE HOPKINS and JULIA JANE YOUNG took photographs of D.A. and published them on the following Internet sites: backpage.com, craigslist.com, and cityvibe.com.

26. Beginning on or about April 1, 2008, and continuing through on or about May 21, 2008, Defendant DeWAYNE EUGENE HOPKINS collected money from D.A. that she earned performing sex acts.

27. On or about May 21 2008, Defendant DeWAYNE EUGENE HOPKINS drove D.A. from Taylorsville, Utah to the Best Western hotel.

28. On or about May 21, 2008, Defendant JULIA JANE YOUNG received a phone call from a customer and then arranged a meeting between D.A. and the customer by placing a phone call to D.A. informing her that the customer was on his way to her hotel room.

29. Beginning on or about April 1, 2008, and continuing through on or about May 21, 2008, Defendants DeWAYNE EUGENE HOPKINS and JULIA JANE YOUNG

recruited and encouraged H.S. and M.H. to work for them as escorts performing commercial sex acts.

30. On or about May 21, 2008, Defendant DeWAYNE EUGENE HOPKINS drove H.S. and M.H. from Taylorsville, Utah, to the Best Western hotel.

31. On or about May 21, 2008, Defendant DeWAYNE EUGENE HOPKINS rented a room at the Best Western hotel from which H.S. and M.H. performed commercial sex acts.

32. On or before May 21, 2008, Defendant DeWAYNE EUGENE HOPKINS instructed H.S. and M.H. regarding how much to charge for various sex acts.

33. On or before May 21, 2008, Defendant DeWAYNE EUGENE HOPKINS ordered H.S. and M.H. to give him half of the money that they earned performing commercial sex acts.

34. On or about May 21, 2008, Defendant DeWAYNE EUGENE HOPKINS collected the money that H.S. and M.H. earned for performing sex acts.

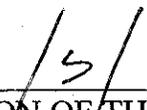
35. On or about May 21, 2008, Defendant DeWAYNE EUGENE HOPKINS took photographs of H.S. and M.H. and instructed H.S. and M.H. to take photographs of themselves using his cellular telephone camera.

36. On or about May 21, 2008, Defendants DeWAYNE EUGENE HOPKINS and JULIA JANE YOUNG published photographs of H.S. and M.H. on backpage.com.

37. On or about May 21, 2008, Defendant JULIA JANE YOUNG arranged meetings between H.S. and M.H. and customers by placing telephone calls to H.S. and informing her that customers were on their way to the Best Western hotel room.

38. On or about May 21, 2008, Defendant DeWAYNE EUGENE HOPKINS drove H.S. and M.H. to Taylorsville, Utah, from the Best Western hotel after they had completed commercial sex acts.

A TRUE BILL:

  
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FOREPERSON OF THE GRAND JURY

BRETT L. TOLMAN  
UNITED STATES ATTORNEY

  
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SCOTT B. ROMNEY  
Assistant United States Attorney