

COUNT TWO

The SPECIAL JANUARY 2012 GRAND JURY further charges:

Beginning in or about February 2011 and continuing until on or about July 27, 2011,
in the Northern District of Illinois, Eastern Division, and elsewhere,

CARL BRANDON SMITH,
a/k/a "Moo,"

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely Victim B, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means would be used to cause Victim B to engage in a commercial sex act, and (2) Victim B had not attained the age of 18 years and would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a)(1), (b)(1) and (b)(2).

COUNT THREE

The SPECIAL JANUARY 2012 GRAND JURY further charges:

In or about February 2011, in the Northern District of Illinois, Eastern Division, and elsewhere,

CARL BRANDON SMITH,
a/k/a "Moo,"

defendant herein, knowingly transported Victim B, a minor under the age of 18, in interstate commerce, from the State of Wisconsin to the State of Illinois, with the intent that Victim B engage in prostitution;

In violation of Title 18, United States Code, Section 2423(a).

COUNT FOUR

The SPECIAL JANUARY 2012 GRAND JURY further charges:

Beginning in or about May 2011 and continuing until in or about July 2011, in the Northern District of Illinois, Eastern Division, and elsewhere,

CARL BRANDON SMITH,
a/k/a "Moo,"

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely Victim C, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means would be used to cause Victim C to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1).

COUNT FIVE

The SPECIAL JANUARY 2012 GRAND JURY further charges:

Beginning in or about November 2011 and continuing until in or about March 2012,
in the Northern District of Illinois, Eastern Division, and elsewhere,

CARL BRANDON SMITH,
a/k/a "Moo,"

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely Victim D, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means would be used to cause Victim D to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY