

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
PAUL SEWELL, a/k/a "GOD" MICHAEL JOHNSON	:	VIOLATIONS: 18 U.S.C. § 1591 (sex trafficking of children, or of adults by force - 5 counts) 18 U.S.C. §§ 2251 (a), (e) (production of child pornography - 3 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, defendants PAUL SEWELL, a/k/a "God," and MICHAEL JOHNSON, were participants in a venture that ran a prostitution ring in and around Reading, Pennsylvania.
2. As part of this venture, defendant PAUL SEWELL, a/k/a "God," recruited young women to work as prostitutes in his business. Several of the women whom he recruited and who worked for him were under the age of 18 years.
3. As part of this venture, defendant PAUL SEWELL, a/k/a "God," generally collected 40% of the fees that each prostitute earned for performing commercial sex acts.
4. As part of this venture, defendant PAUL SEWELL, a/k/a "God," used force, coercion, and threats of force to cause the prostitutes in his venture to engage in commercial sex acts.

5. As part of this venture, defendant MICHAEL JOHNSON drove prostitutes to jobs.

6. As part of this venture, when defendant PAUL SEWELL, a/k/a “God,” initially recruited a girl, he had her write down, or asked her and he wrote down, her name, address, birth date, and measurements.

7. As part of this venture, when defendant PAUL SEWELL, a/k/a “God,” initially recruited a girl, he took a series of photographs of each girl with his camera; several clothed, then several topless, and finally, several naked close-up shots with the girl’s legs spread, revealing her genitalia.

8. As part of this venture, when defendant PAUL SEWELL, a/k/a “God,” initially recruited a girl, gave her a “working name.”

9. As part of this venture, defendant PAUL SEWELL, a/k/a “God,” ran a website on which he advertised his business as an escort service. The website featured pictures of the prostitutes, either scantily clad, or topless with their hands covering their breasts, the girl’s working name, her measurements, height, and weight, and price per hour.

10. As part of this venture, when defendant PAUL SEWELL, a/k/a “God,” initially recruited a girl, he would take her to a tattoo parlor to have the back of her neck tattooed with his nickname and her nickname (“God’s [girl’s working name]).”

11. Between on or about September 1, 2008, and on or about June 30, 2010, in the Eastern District of Pennsylvania, defendant

**PAUL SEWELL,
a/k/a “GOD,”**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained a person whose identity is known to the Grand Jury (hereinafter referred to as "Person 1"), 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 SEWELL did this, he knew and acted in reckless disregard of the fact that Person 1 had not attained the age of 18 years and that Person 1 would be caused 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 10 of Count One are incorporated by reference.

2. Between on or about June 1, 2010, and on or about June 10, 2010, in the Eastern District of Pennsylvania, defendant

**PAUL SEWELL,
a/k/a "GOD,"**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained a person whose identity is known to the Grand Jury (hereinafter referred to as "Person 2"), 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 SEWELL did this, he knew, and acted in reckless disregard of the fact that, Person 2 had not attained the age of 18 years and that Person 2 would be caused to engage in commercial sex acts.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of Paragraphs 1 through 10 of Count One are incorporated by reference.
2. Between on or about January 1, 2006, and on or about June 30, 2010, in the Eastern District of Pennsylvania, defendant

**PAUL SEWELL,
a/k/a "GOD,"**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained a person whose identity is known to the Grand Jury (hereinafter referred to as "Person 3"), and benefitted financially from participation in a venture which engaged in the knowing recruitment, enticement, harboring, transporting, providing, obtaining, and maintaining of Person 3, and attempted to do so. At the time that defendant SEWELL did this, he knew, and acted in reckless disregard of the fact that, Person 3 had not attained the age of 18 years, that Person 3 would be caused to engage in commercial sex acts, and that means of force, threats of force, fraud, coercion, and combinations of such means would be used to cause Person 3 to engage in a commercial sex acts.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of Paragraphs 1 through 10 of Count One are incorporated by reference.

2. Between on or about September 1, 2009, and on or about March 1, 2010, in the Eastern District of Pennsylvania, defendant

**PAUL SEWELL,
a/k/a "GOD,"**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained a person whose identity is known to the Grand Jury (hereinafter referred to as "Person 4"), and benefitted financially from participation in a venture which engaged in the knowing recruitment, enticement, harboring, transporting, providing, obtaining, and maintaining of Person 4, and attempted to do so. At the time that defendant SEWELL did this, he knew, and acted in reckless disregard of the fact that, means of force, threats of force, fraud, coercion, and combinations of such means would be used to cause Person 4 to engage in a commercial sex acts.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of Paragraphs 1 through 10 of Count One are incorporated by reference.
2. On or before September 15, 2008, in the Eastern District of Pennsylvania, defendant

**PAUL SEWELL,
a/k/a "GOD,"**

employed, used, persuaded, induced, enticed, or coerced Person 1, who was under the age of 18, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction would be transported or transmitted in and affecting interstate commerce, or attempted to do so, that is, defendant SEWELL photographed the naked genitalia of Person 1, whose name is known to the Grand Jury, for the purposes of sending the photograph over the Internet.

In violation of Title 18, United States Code, Section 2251(a) and (e) and 2256(2)(A)(v).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of Paragraphs 1 through 10 of Count One are incorporated by reference.
2. On or before June 2, 2010, in the Eastern District of Pennsylvania, defendant

**PAUL SEWELL,
a/k/a “GOD,”**

employed, used, persuaded, induced, enticed, and coerced Person 2, who was under the age of 18, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction would be transported or transmitted in and affecting interstate commerce, or attempted to do so, that is, defendant SEWELL photographed the naked genitalia of Person 2, whose name is known to the Grand Jury, for the purposes of sending the photograph over the Internet.

In violation of Title 18, United States Code, Section 2251(a) and (e) and 2256(2)(A)(v).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of Paragraphs 1 through 10 of Count One are incorporated by reference.
2. On or before October 15, 2008, in the Eastern District of Pennsylvania, defendant

**PAUL SEWELL,
a/k/a "GOD,"**

employed, used, persuaded, induced, enticed, or coerced Person 5, who was under the age of 18, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing that such visual depiction would be transported or transmitted in and affecting interstate commerce, or attempted to do so, that is, defendant SEWELL photographed the naked genitalia of Person 5, whose name is known to the Grand Jury, for the purposes of sending the photograph over the Internet.

In violation of Title 18, United States Code, Section 2251(a) and (e) and 2256(2)(A)(v).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of Paragraphs 1 through 10 of Count One are incorporated by reference.

2. Between on or about June 1, 2008, and on or about June 30, 2010, in the Eastern District of Pennsylvania, defendant

MICHAEL JOHNSON

in and affecting interstate commerce, knowingly harbored, transported, provided, and maintained persons whose identities are known to the Grand Jury, and benefitted financially and received things of value from his participation in the venture described in Count One, which engaged in the knowing recruitment, enticement, harboring, transporting, providing, obtaining, and maintaining of persons to engage in commercial sex acts, and attempted to do so, and aided and abetted such acts. At the time that defendant JOHNSON did this, he knew, and acted in reckless disregard of the fact, that some persons that the venture caused to engage in commercial sex acts had not attained the age of 18 years, and that the venture used means of force, threats of force, fraud, coercion, and combinations of such means to cause some persons to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1591, 1594(a) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1591 and 2251, set forth in this indictment, defendant

**PAUL SEWELL,
a/k/a "GOD"**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, including, but not limited to:

- (a) Real property located at 214 North 10th Street, Reading, PA.
- (b) Real property located at 209 Fisher Court, Reading, PA.
- (c) Isuzu Rodeo bearing PA registration HGR 5079.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (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 defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 1594(d) and (e), and 2253.

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney