

1. The defendant, **RANDY JONAL SCHENCK** ("**SCHENCK**"), was an adult male born in April 1981 who lived for extended periods of time in both California and the New Orleans, Louisiana area.

2. **Dominique Alaina Berry** ("**Berry**") was a United States citizen, who resided in Tangipahoa Parish, Louisiana, within the Eastern District of Louisiana. **Berry** was born in July 1989.

3. **SCHENCK** and **Berry** met in the New Orleans area in about early 2013 and soon thereafter developed a romantic relationship.

4. Between about 2013 and September 2017, **SCHENCK** and **Berry** traveled across the country, including to California, Louisiana, New Mexico, Texas, Arizona, Tennessee, and Georgia.

5. **SCHENCK** used facilities of interstate commerce, including vehicles, public highways, hotels, cellular telephones, and the Internet to facilitate commercial sex acts involving **Berry**. Among the vehicles **SCHENCK** used was a white Mercedes Benz sport utility vehicle bearing Arizona license plate BWB6164.

6. Between not later than about January 2015 and September 2017, **SCHENCK** and **Berry** posted advertisements containing photographs of **Berry** on multiple location-specific online classified ad service websites and social media applications in, among other places, California, Louisiana, New Mexico, Texas, Arizona, Tennessee, and Georgia, that invited interested individuals to contact **Berry** to schedule sexual interactions, many of which were explicitly commercial.

7. In the advertisements, **Berry** was often referred to using aliases, including "Desiree Knowles," "Jasmine Collins," and "Stephanie."

8. **SCHENCK** determined the rates to be charged for commercial sex acts involving **Berry**.

9. **SCHENCK** provided **Berry** with condoms to use when **Berry** anticipated engaging in commercial sex acts.

10. In or about September 2015, **SCHENCK** caused **Berry** to use the Internet to meet an adult male via an online dating application/website in the Bakersfield, California, area.

11. In or about March 2016, **SCHENCK** caused **Berry** to use the Internet to meet an adult male via an online dating application/website in the Phoenix, Arizona, area.

12. In or about June 2016, **SCHENCK** caused **Berry** to use the Internet to meet an adult male via an online dating application/website in the Phoenix, Arizona, area.

13. In or about September and October 2016, **SCHENCK** caused **Berry** to use the Internet to meet an adult male via an online dating application/website in the Tucson, Arizona, area.

14. In or about October 2016, **SCHENCK** caused **Berry** to use the Internet to meet an adult male via an online dating application/website in the Albuquerque, New Mexico, area.

15. In or about October 2016, **SCHENCK** caused **Berry** to use the Internet to meet an adult male via an online dating application/website in the Bakersfield, California, area.

16. In or about December 2016, **SCHENCK** caused **Berry** to use the Internet to meet an adult male via an online classified advertisement marketplace in the Peoria, Arizona, area.

17. In or about December 2016, **SCHENCK** caused **Berry** to use the Internet to meet an adult male via an online classified advertisement marketplace in the Sacramento, California, area.

18. S.A. was an adult male who resided in Metairie, Louisiana.

19. On or about February 24, 2017, S.A. met **Berry** through a social media cellular phone application designed to meet and interact with strangers. Thereafter, S.A. exchanged phone calls and text messages with phone number (504) 339-3990, a phone number used by **Berry**.

20. On or about February 24, 2017, at approximately 9:30 p.m., **SCHENCK** dropped **Berry** off at S.A.'s apartment, located in Metairie, Louisiana, within the Eastern District of Louisiana.

21. On or about February 25, 2017, detectives with the Jefferson Parish Sheriff's Office responded to a wellness check at S.A.'s residence and found S.A. to be deceased.

22. In or about August 2017, **SCHENCK** and **Berry** traveled to the state of Georgia.

23. In or about August 2017, **SCHENCK** caused **Berry** to use the Internet to meet an adult male via an online dating application/website in the Kennesaw, Georgia, area.

24. In or about August 2017, **SCHENCK** caused **Berry** to use the Internet to meet an adult male via an online dating application/website in the Marietta, Georgia, area.

25. In or about September 2017, **SCHENCK** caused **Berry** to use the Internet to meet an adult male via an online dating application/website in the Sandy Springs, Georgia, area.

26. On or about September 13, 2017, **SCHENCK** and **Berry** were arrested at a hotel in Sandy Springs, Georgia.

27. When law enforcement authorities located **Berry** at the hotel in Sandy Springs, Georgia, she was bleeding from her nose, had a swollen lip and puncture consistent with her teeth biting through her lip, and a substance consistent with black electrical tape around one of her arms.

28. The laws of the states of California, Louisiana, New Mexico, Texas, Arizona, Tennessee, and Georgia, among others, made prostitution a criminally punishable unlawful activity.

B. THE OFFENSE:

On or about the dates listed below, in the Eastern District of Louisiana, and elsewhere, the defendant, **RANDY JONAL SCHENCK**, traveled in interstate commerce and used and caused to be used a facility in interstate commerce, to wit: the Internet, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, a business enterprise involving prostitution in violation of the laws of the states in which they were committed, and thereafter performed and attempted to perform the acts described below to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of such unlawful activity:

| Count | Date | Description |
|-------|-------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | September 2, 2015 | Use of online classified advertisement service "Backpage.com" to post advertisement ID 34697834 in the Tucson, Arizona, area |
| 2 | November 26, 2015 | Use of online classified advertisement service "Backpage.com" to post advertisement ID 61896389 in the Los Angeles, California, area |
| 3 | March 29, 2016 | Use of online classified advertisement service "Backpage.com" to post advertisement ID 38792698 in the Phoenix, Arizona, area |
| 4 | October 1, 2016 | Use of online classified advertisement service "Backpage.com" to post advertisement ID 8129829 in the Albuquerque, New Mexico, area |
| 5 | October 21, 2016 | Use of online classified advertisement service "Backpage.com" to post advertisement ID 14063100 in the Bakersfield, California, area |
| 6 | February 25, 2017 | Use of social media application "Meet Me" and cellular phone bearing number (504) 339-3990 to meet and thereafter schedule interaction with S.A. in the Metairie, Louisiana, area |

All in violation of Title 18, United States Code, Sections 1952(a)(3) and 2.

COUNTS 7-8
(Wire Fraud)

A. AT ALL TIMES MATERIAL HEREIN:

29. The allegations of Section A of Counts 1 through 6 are hereby realleged and incorporated herein in their entirety.

30. JPMorgan Chase Bank, N.A. ("Chase Bank") was a financial institution located in New Orleans, Louisiana, within the Eastern District of Louisiana, and elsewhere, the deposits of which were insured by the Federal Deposit Insurance Corporation.

31. S.A. had a checking account at Chase Bank bearing account number x7887.

32. S.A. also had a debit card in his name, which drew on the funds contained in the Chase Bank account bearing account number x8230 ("S.A.'s debit card").

33. On or about February 25, 2017, **SCHENCK** and **Berry** used S.A.'s debit card to make a purchase at a Walmart Supercenter located in New Orleans, Louisiana, in the amount of \$81.04.

34. On or about February 25, 2017, **SCHENCK** and **Berry** used S.A.'s debit card to make a purchase at a Discount City market/gas station located in New Orleans, Louisiana, in the amount of \$71.16.

B. THE SCHEME TO DEFRAUD:

Beginning at a time unknown, but not later than about 2013, and continuing through on or about September 13, 2017, in the Eastern District of Louisiana and elsewhere, the defendant, **RANDY JONAL SCHENCK**, did knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money, funds, and property by means of false and fraudulent pretenses, representations, and promises, and attempting to do so, namely, that **SCHENCK** would use credit

cards, debit cards, and other valuables taken without authorization to purchase goods and services to be used for the benefit of **SCHENCK** and individuals **SCHENCK** chose to benefit.

C. MANNER AND MEANS:

35. It was part of the scheme and artifice to defraud that **SCHENCK** caused **Berry** to meet dozens of individuals on social media applications and through websites. **SCHENCK** then caused **Berry** to arrange sexual interactions with the individuals.

36. It was further part of the scheme and artifice to defraud that **SCHENCK** often drove **Berry** to “out call” interactions and, if asked, identified himself as a driver who worked for a ridesharing company.

37. It was further part of the scheme and artifice to defraud that **SCHENCK** instructed **Berry** to place illegal and prescription drugs, including anti-psychotic prescription medications, into the beverages of the individuals for the purpose of “spiking” their drinks and rendering them unconscious.

38. It was further part of the scheme and artifice to defraud that **SCHENCK** instructed **Berry** to steal the valuable personal property, including electronics, credit and debit cards, firearms, jewelry, and pharmaceutical products once the individuals were unconscious and incapacitated.

39. It was further part of the scheme and artifice to defraud that **SCHENCK** used, and caused **Berry** to use, the stolen debit and credit cards of the individuals to purchase goods and services for the benefit of **SCHENCK**, individuals associated with **SCHENCK**, and **Berry** fraudulently, that is, without the knowledge or authorization of the people to whom the credit and debit cards belonged.

40. It was further part of the scheme and artifice to defraud that **SCHENCK** sold, and caused **Berry** to sell, some of the personal property they stole at pawn shops, with the proceeds to be used for their benefit.

41. It was further part of the scheme and artifice to defraud that **SCHENCK** threatened, slapped, struck, beat, and choked **Berry** for the purpose of establishing dominion over her, controlling her behavior, and ensuring her compliance with his instructions. **SCHENCK** typically did so when he believed **Berry** was not performing her role effectively, not stealing enough, not wanting to work, or tried to leave **SCHENCK**.

42. It was further part of the scheme and artifice to defraud that **SCHENCK** threatened to hurt, or have someone else hurt, **Berry's** relatives if **Berry** tried to leave him or disobey his orders.

D. THE USE OF THE WIRES:

On or about the dates set forth below, in the Eastern District of Louisiana and elsewhere, the defendant, **RANDY JONAL SCHENCK**, for the purpose of executing and attempting to execute the scheme and artifice to defraud described above, did transmit and cause to be transmitted by means of wire communication in interstate commerce writing, signs, signals and sounds by means of wire communication in interstate and foreign commerce, as described below:

| <u>COUNT</u> | <u>DATE</u> | <u>AMOUNT</u> | <u>DESCRIPTION</u> |
|--------------|-------------------|---------------|----------------------------------------------------------------------------------------------------------------------------------|
| 7 | February 25, 2017 | \$81.04 | Unauthorized use of S.A.'s debit card to make a purchase at a Walmart Supercenter located in New Orleans, Louisiana |
| 8 | February 25, 2017 | \$71.16 | Unauthorized use of S.A.'s debit card to make a purchase at a Discount City market/gas station located in New Orleans, Louisiana |

All in violation of Title 18, United States Code, Section 1343.

COUNT 9

(Sex Trafficking by Force, Fraud, and Coercion)

A. AT ALL TIMES MATERIAL HEREIN:

The allegations of Section A of Counts 1 through 6 and Sections A and C of Counts 7 through 8 are hereby realleged and incorporated herein in their entirety.

B. THE OFFENSE:

Beginning at a time unknown, but not later than about October 2013, and continuing until on or about September 13, 2017, in the Eastern District of Louisiana, and elsewhere, the defendant, **RANDY JONAL SCHENCK**, knowingly, recruited, enticed, transported, harbored, provided, obtained, and maintained, by any means, and attempted to recruit, entice, transport, harbor, provide, obtain, and maintain, in and affecting interstate commerce, **Berry**, 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 **Berry** to engage in a commercial sex act, as that term is defined by Title 18, United States Code, Section 1591(e)(3), and knowingly benefitted financially and by receiving anything of value from participation in a venture that engaged in an act of recruiting, enticing, transporting, harboring, providing, obtaining, and maintaining by any means a person 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 **Berry** to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), 1591(b)(1), and 1594(a).

COUNT 10

(Transportation of Individual to Engage in Prostitution)

A. AT ALL TIMES MATERIAL HEREIN:

The allegations of Section A of Counts 1 through 6 and Sections A and C of Counts 7 through 8 are hereby realleged and incorporated herein in their entirety.

B. THE OFFENSE:

Between on or about August 12, 2015, and not later than on or about September 2, 2015, in the Eastern District of Louisiana, and elsewhere, the defendant, **RANDY JONAL SCHENCK**, knowingly transported **Berry** in interstate commerce, from Louisiana to Arizona, with intent that **Berry** engage in prostitution and sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2421.

COUNT 11

(Transportation of Individual to Engage in Prostitution)

A. AT ALL TIMES MATERIAL HEREIN:

The allegations of Section A of Counts 1 through 6 and Sections A and C of Counts 7 through 8 are hereby realleged and incorporated herein in their entirety.

B. THE OFFENSE:

On or about August 5, 2017, in the Eastern District of Louisiana, and elsewhere, the defendant, **RANDY JONAL SCHENCK**, knowingly transported **Berry** in interstate commerce, from Louisiana to Georgia, with intent that **Berry** engage in prostitution and sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2421.

COUNT 12
(Aggravated Identity Theft)

A. AT ALL TIMES MATERIAL HEREIN:

The allegations of Section A of Counts 1 through 6 and Sections A and C of Counts 7 through 8 are hereby realleged and incorporated herein in their entirety.

B. THE OFFENSE:

On or about February 25, 2017, in the Eastern District of Louisiana, the defendant, **RANDY JONAL SCHENCK**, did knowingly possess and use, without lawful authority, a means of identification of another person, S.A., during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: wire fraud, knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 12 are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offenses alleged in Counts 1 through 8, the defendant, **RANDY JONAL SCHENCK**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property real or personal which constitutes or is derived from proceeds traceable to said offenses.

3. As a result of the offense alleged in Count 9, the defendant, **RANDY JONAL SCHENCK**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 1594(d), any interest in any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of said offense, and any property traceable to such property; and any property, real or personal, constituting or derived from any proceeds

obtained directly or indirectly as a result of said offense, and any property traceable to such property.

4. As a result of the offenses alleged in Counts 10 and 11, the defendant, **RANDY JONAL SCHENCK**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2428(a), any interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and any property, real or personal, constituting or derived from any proceeds obtained directly or indirectly as a result of said offense.

5. If any of the above-described property, 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 person;
- 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 subdivided without difficulty;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

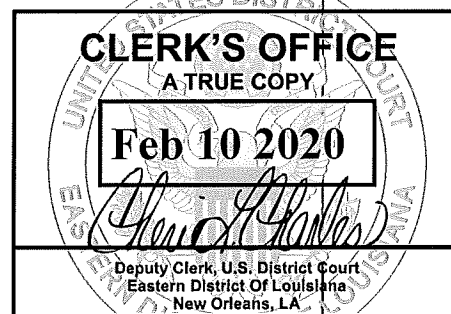
A TRUE BILL:


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New Orleans, Louisiana
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