FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

2022 JUN 10 P. 1: 42

CAROL L. MICHEL

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

FELONY

INDICTMENT FOR SEX TRAFFICKING OF A MINOR

UNITED STATES OF AMERICA

CRIMINAL NO.

22-118

SECTION:

SECT.R MAG 5

DOMINIQUE PEEPLES

v.

a/k/a "Dominiquo Peeples"

a/k/a "Frado" a/k/a "Loc Frado" **VIOLATIONS: 18 U.S.C. § 1591(a)**

18 U.S.C. § 1591(b)

18 U.S.C. § 1594

18 U.S.C. § 2

The Grand Jury charges that:

COUNT 1

A. <u>AT ALL TIMES MATERIAL HEREIN:</u>

- 1. Minor Victim was a juvenile female who was born in about August 2003 and resided in the Memphis, Tennessee area.
- 2. The defendant, **DOMINIQUE PEEPLES**, a/k/a "Dominiquo Peeples" a/k/a "Frado" a/k/a "Loc Frado" (PEEPLES), was an adult male born in 1997 who resided in the Memphis, Tennessee area.

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- 3. On or about December 17, 2020, law enforcement officials encountered Minor Victim, who was with **PEEPLES**, at a Days Inn & Suites, located at New Orleans, Louisiana, within the Eastern District of Louisiana.
- 4. On or about January 2, 2021, a posting titled "hey daddies come see about me" was posted to an online classified ad service commonly used to advertise sexual services in exchange for money, advertising, among other things, "pornstar experience" and "deep throat" with photographs of Minor Victim.
- In or around mid-January of 2021, Minor Victim fled from PEEPLES in Houston,
 Texas and returned to Memphis, Tennessee.

B. THE OFFENSE:

Beginning at a time unknown, but not later than in or around August of 2020, and continuing until in or around mid-January of 2021 in the Eastern District of Louisiana, and elsewhere, the defendant, **DOMINIQUE PEEPLES**, a/k/a "Dominiquo Peeples" a/k/a "Frado" a/k/a "Loc Frado," knowingly, in and affecting interstate and foreign commerce, recruited, enticed, transported, harbored, provided, obtained, and maintained, by any means, and attempted to recruit, entice, transport, harbor, provide, obtain, and maintain, Minor Victim, a person who had not attained the age of 18 years, having had a reasonable opportunity to observe Minor Victim, knowing and in reckless disregard of the fact that Minor Victim had not attained the age of 18 years and that Minor Victim would be caused to engage in a commercial sex act, as that term is defined by Title 18, United States Code, Section 1591(e)(3).

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

NOTICE OF FORFEITURE

- 1. The allegation of Count 1 of this Indictment is 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 offense alleged in Count 1, the defendant, **DOMINIQUE PEEPLES**, a/k/a "Dominiquo Peeples" a/k/a "Frado" a/k/a "Loc Frado," shall forfeit to the United States pursuant to Title 18, United States Code, Section 1594(d), any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the 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 the offense, and any property traceable to such property.
- 3. 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. the defendant up to the value of said property.



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New Orleans, Louisiana June 10, 2022