

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 09-20 (RBK)

v. :

JAVON GORDON, : 18 U.S.C. § 2423(a)
a/k/a "Teflon" : 18 U.S.C. § 1591(a)
: 18 U.S.C. § 2251(a)
: 18 U.S.C. § 2252A(a)(2)
: 18 U.S.C. § 2252A(a)(g)
: 18 U.S.C. § 2421
: 18 U.S.C. § 2
Forfeiture - 18 U.S.C. §§ 2428 and 2253

SUPERSEDING INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Camden, charges:

General Allegations

1. From in or about September 2007 until in or about July 2008, defendant JAVON GORDON operated a prostitution enterprise in Atlantic City, New Jersey and elsewhere.
2. As part of his prostitution enterprise, defendant JAVON GORDON recruited, promoted, employed, transported and controlled both minor girls and adult females who worked as prostitutes for him.
3. As part of his prostitution enterprise, defendant JAVON GORDON recruited and attempted to recruit minor girls and adult females: (a) in and around Atlantic City; and (b) by searching for them on the internet, to work for him as prostitutes.
4. As part of his prostitution enterprise, defendant JAVON GORDON: (a) used a digital camera to take naked, partially-naked and sexually-suggestive pictures of the minor girls and adult females that worked for him; (b) transferred the digital photographs to a computer; and

(c) posted these images on various internet websites, such as Craigslist and others, in order to advertise the prostitutes for sexual services.

5. As part of his prostitution enterprise, defendant JAVON GORDON gave the minor girls and adult females training and advice regarding prostitution, including but not limited to:

- a. how to complete a commercial sex act (i.e. any sex act in exchange for money or anything of value);
- b. prices to be charged for various commercial sex acts;
- c. procedures for staying in contact with defendant JAVON GORDON before, during, and after engaging in a commercial sex act;
- d. locations (i.e. the “tracks,” which are the areas of a particular street or certain areas of the city where prostitutes work and which are known markets for prostitutes, and the casinos) where they were to solicit the customers or “dates.”

6. As part of his prostitution enterprise, defendant JAVON GORDON directed minor girls and adult females working for him as prostitutes:

- a. solicit dates in Atlantic City on the street and in the casinos and through internet advertisements;
- b. perform sexual acts on customers in exchange for money; and
- c. turn over to him the money they received for performing sexual acts.

7. Defendant JAVON GORDON spent the proceeds from his prostitution enterprise on, among other things, hotel rooms, condoms, and gambling at various casinos in Atlantic City.

8. As part of his prostitution enterprise, defendant JAVON GORDON transported or

arranged for the transportation of his minor girls and adult female prostitutes from Atlantic City, New Jersey to various locations such as: the Boston, Massachusetts metropolitan area, the Washington, D.C. metropolitan area and elsewhere, so that they could work as prostitutes for his financial benefit.

9. Defendant JAVON GORDON controlled the behavior of his prostitutes through threats, coercion and physical violence. During the course of the prostitution enterprise, defendant JAVON GORDON kidnapped and/or assaulted prostitutes who were unwilling to work for him in his prostitution enterprise.

10. During the course of his prostitution enterprise, defendant JAVON GORDON had various individuals either: (a) work for him as prostitutes; (b) post bail money for various people that were arrested; (c) provide transportation for defendant JAVON GORDON and his prostitutes; (d) provide technical computer assistance for him (to allow him to advertise his prostitutes on the Internet but avoid detection by law enforcement); and (e) recruit adult females and minor girls to work as prostitutes.

COUNT ONE

(18 U.S.C. § 2252A(g) – *Child Exploitation Enterprise*)

1. Paragraphs 1 through 10 of the General Allegations are incorporated as if set forth at length herein.

2. From in or about September 2007 to in or about July 2008, in Atlantic County, in the District of New Jersey, and elsewhere, the defendant,

JAVON GORDON, a/k/a “Teflon,”

in concert with three or more other persons, both known and unknown to the Grand Jury, did engage in a child exploitation enterprise constituting three or more separate incidents, that is, sex

trafficking of children, sexual exploitation of children, distribution of child pornography, transportation of minors to engage in prostitution, aggravated assault, and kidnaping, involving more than one victim.

In violation of Title 18, United States Code, Section 2252A(g).

COUNT TWO

(18 U.S.C. § 1591(a) – Sex Trafficking of Children)

1. Paragraphs 1 through 10 of the General Allegations are incorporated as if set forth at length herein.

2. From in or about September 2007 to in or about July 2008, in Atlantic County, in the District of New Jersey, and elsewhere, the defendant,

JAVON GORDON, a/k/a “Teflon,”

did knowingly, in and affecting interstate commerce, recruit, entice, and harbor [A.S.] - age 17 and [M.W] - age 17, knowing that force, fraud, and coercion would be used to cause A.S. and M.W. to engage in commercial sex acts; and knowing that the minors had not attained the age of 18 and would be caused to engage in a commercial sex act.

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

COUNT THREE

(18 U.S.C. § 2423 - Transportation of Minor to Engage in Prostitution)

1. Paragraphs 1 through 10 of the General Allegations are incorporated as if set forth at length herein.

2. From in or about March 2008 to on or about April 16, 2008, in Atlantic County, in the District of New Jersey, and elsewhere, the defendant,

JAVON GORDON, a/k/a “Teflon,”

did knowingly transport an individual who had not attained the age of 18 years, namely, A.S., in interstate commerce, with intent that A.S. engage in prostitution, and in any sexual activity for which any person could be charged with a criminal offense.

In violation of Title 18, United States Code, Section 2423(a) and Title 18, United States Code, Section 2.

COUNT FOUR

(18 U.S.C. § 2423 - Transportation of Minor to Engage in Prostitution)

1. Paragraphs 1 through 10 of the General Allegations are incorporated as if set forth at length herein.

2. In or about July 2008, in Atlantic County, in the District of New Jersey, and elsewhere, the defendant,

JAVON GORDON, a/k/a “Teflon,”

did knowingly transport an individual who had not attained the age of 18 years, namely, M.W., in interstate commerce, with intent that M.W. engage in prostitution, and in any sexual activity for which any person could be charged with a criminal offense.

In violation of Title 18, United States Code, Section 2423(a) and Title 18, United States Code, Section 2.

COUNT FIVE

(18 U.S.C. § 2421 - Transportation of an Adult to Engage in Prostitution)

1. Paragraphs 1 through 10 of the General Allegations are incorporated as if set forth at length herein.

2. From in or about September 2007 to in or about July 2008, in Atlantic County, in the District of New Jersey, and elsewhere, the defendant,

JAVON GORDON, a/k/a “Teflon,”

did knowingly transport an individual, namely C.S., in interstate commerce, with intent that C.S. engage in prostitution, and in sexual activity for which a person can be charged with a criminal offense.

In violation of Title 18, United States Code, Section 2421 and Title 18, United States Code, Section 2.

COUNT SIX

(18 U.S.C. § 2251(a) – Sexual Exploitation of Children)

1. Paragraphs 1 through 10 of the General Allegations are incorporated as if set forth at length herein.

2. From in or about September 2007 to in or about July 2008, in Atlantic County, in the District of New Jersey, and elsewhere, the defendant,

JAVON GORDON, a/k/a “Teflon,”

did knowingly employ, use, persuade, induce, entice, and coerce one or more minors - - namely, A.S. and M.W. - - to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct which depictions were transported in interstate commerce, including by computer.

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

COUNT SEVEN

(18 U.S.C. § 2252A(a)(2) – *Distribution of Child Pornography*)

1. Paragraphs 1 through 10 of the General Allegations are incorporated as if set forth at length herein.

2. From in or about September 2007 to in or about July 2008, in Atlantic County, in the District of New Jersey, and elsewhere, the defendant,

JAVON GORDON, a/k/a “Teflon,”

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been transported in interstate or foreign commerce, including by computer.

In violation of Title 18 United States Code, Section 2252(A)(a)(2) and Title 18, United States Code, Section 2.

COUNT EIGHT

(18 U.S.C. § 2252A(a)(5)(B) - Possession of Child Pornography)

1. Paragraphs 1 through 10 of the General Allegations are incorporated as if set forth at length herein.

2. From in or about September 2007 to in or about July 2008, in Atlantic County, in the District of New Jersey, and elsewhere, the defendant,

JAVON GORDON, a/k/a “Teflon,”

did knowingly possess a computer hard drive, computer disk, and other “material” that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which images were shipped and transported in interstate and foreign commerce by any means, including by computer, and that were produced using materials that were shipped and transported in interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B) and Title 18, United States Code, Section 2.

FIRST FORFEITURE ALLEGATION

1. The allegations contained in Counts Three and Four of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2428.

2. Pursuant to Title 18, United States Code, Section 2428, upon conviction of an offense in violation of Title 18, United States Code, Section 2423, the defendant, JAVON GORDON, shall forfeit to the United States of America any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offenses and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offenses. The property to be forfeited includes, but is not limited to, the following:

- a. A Blackberry Cellular telephone Model 7200, blue in color with IMEI# 357493004945495;
- b. A Blackberry cellular telephone, Model 8320, black in color with a IMEI# 358265012611783;
- c. A Blackberry Cellular telephone, model 7100 silver in color with an IMEI# 354529003363462;
- d. A Motorola Cellular phone, black in color, model H80XAH6RRIAN with an IMEI# 001702747933660;
- e. a Sony Cybershot 7.2 megapixel digital camera bearing serial number 0978623 with a 1 gigabyte Pro Duo Memory Card;
- f. Removable media described as a I/O Magic Gigabank, 8GB, storage

device bearing serial number 0978623; and

g. Hewlett Packard Pavilion laptop computer, model DV6000 bearing serial number CNF8041JHN.

If any of the above-described forfeitable 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 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;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

SECOND FORFEITURE ALLEGATION

1. The allegations contained in Counts One, Two, Five, Six and Seven of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253.

2. Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense in violation of Title 18, United States Code, Sections 2251, 2252A and 2421, the defendant JAVON GORDON, shall forfeit to the United States of America:

a. Any visual depiction described in Title 18, United States Code, sections 2251, 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110;

b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and

c. Any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses.

The property to be forfeited includes, but is not limited to, the following:

a. A Blackberry Cellular telephone Model 7200, blue in color with IMEI# 357493004945495;

b. A Blackberry cellular telephone, Model 8320, black in color with a IMEI# 358265012611783;

c. A Blackberry Cellular telephone, model 7100 silver in color with an IMEI# 354529003363462;

d. A Motorola Cellular phone, black in color, model H80XAH6RRIAN with an IMEI# 001702747933660;

e. a Sony Cybershot 7.2 megapixel digital camera bearing serial number 0978623 with a 1 gigabyte Pro Duo Memory Card;

f. Removable media described as a I/O Magic Gigabank, 8GB, storage device bearing serial number 0978623; and

g. Hewlett Packard Pavilion laptop computer, model DV6000 bearing serial number CNF8041JHN.

3. If any of the property described above, 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 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,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and by Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

RALPH J. MARRA, JR.
Acting United States Attorney

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SUPERSEDING INDICTMENT FOR

**18 U.S.C. § 2423
18 U.S.C. § 1591
18 U.S.C. § 2251
18 U.S.C. § 2252A
18 U.S.C. § 2421
18 U.S.C. § 2
18 U.S.C. §§ 2428 and 2253**

A True Bill,

Foreperson

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