

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**INDICTMENT FOR CONSPIRACY TO COMMIT SEX TRAFFICKING OF  
CHILDREN, SEX TRAFFICKING OF CHILDREN, COERCION  
AND ENTICEMENT OF AN INDIVIDUAL TO TRAVEL TO ENGAGE IN  
PROSTITUTION, COERCION AND ENTICEMENT OF A MINOR TO ENGAGE IN  
ILLEGAL SEXUAL ACTIVITY, USE OF AN INTERSTATE FACILITY TO  
PROMOTE PROSTITUTION, AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

\*

CRIMINAL NO.

v.

\*

SECTION:

TIMOTHY JONES

\*

VIOLATIONS: 18 U.S.C. § 2

a/k/a "Lucci"

18 U.S.C. § 1591(a)

a/k/a "King Lucci"

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18 U.S.C. § 1591(b)

a/k/a "Lucci Loco"

18 U.S.C. § 1594

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18 U.S.C. § 1952(a)(2)

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18 U.S.C. § 1952(a)(3)

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18 U.S.C. § 2422(a)

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18 U.S.C. § 2422(b)

18 U.S.C. § 2428

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The Grand Jury charges that:

**COUNT 1**

**(Conspiracy to Commit Sex Trafficking of Children)**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. **Minor Victim 1** was a juvenile female who was born in about August 1996 and resided in the Baton Rouge, Louisiana area.

2. **Minor Victim 2** was a juvenile female who was born in about August 1997 and resided in the Memphis, Tennessee area.

3. The defendant, **TIMOTHY JONES, a/k/a “Lucci,” a/k/a “King Lucci,” a/k/a “Lucci Loco,” (“JONES”)**, is an adult male born in 1990 who resided in the Memphis, Tennessee area.

4. On or about February 11, 2014, law enforcement officials recovered **Minor Victim 2** at the Residence Inn hotel, located at 345 St. Joseph Street, in New Orleans, Louisiana. They subsequently determined that **Minor Victim 2** was listed by the Memphis Police Department as a missing person.

**B. THE CONSPIRACY:**

Beginning at a date unknown, but not later than on or about December 11, 2013, and continuing until on or about February 11, 2014, within the Eastern District of Louisiana and elsewhere, the defendant, **TIMOTHY JONES, a/k/a “Lucci,” a/k/a “King Lucci,” a/k/a “Lucci Loco,”** and others known and unknown to the Grand Jury, did combine, conspire, confederate, and agree to knowingly recruit, entice, transport, harbor, provide, obtain, and maintain by any means, **Minor Victim 1**, 17-year-old female, and **Minor Victim 2**, a 16-year-old female, and to knowingly benefit financially from participating in a venture that recruited, enticed, transported, harbored, provided, obtained, and maintained by any means, **Minor Victim 1** and **Minor Victim 2**, in and affecting interstate commerce, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause **Minor Victim 1** and **Minor Victim 2** to engage in commercial sex acts and, having had a reasonable opportunity to observe **Minor Victim 1** and **Minor Victim 2**, knowing and in reckless disregard of the fact that **Minor Victim 1** and **Minor Victim 2** had not attained the age of 18 years and that **Minor Victim 1** and **Minor Victim 2** would be caused to engage in commercial sex acts, as that term is defined by Title 18, United States Code, Section 1591(e)(3), in violation of Title 18,

United States Code, Sections 1591(a)(1) and 1591(a)(2).

**C. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY:**

In furtherance of the conspiracy, and to accomplish the object of the conspiracy, **JONES** and others committed various overt acts within the Eastern District of Louisiana and elsewhere, including, but not limited to, the following:

1. In about early December 2013, **JONES** met **Minor Victim 1** in the New Orleans, Louisiana area. **JONES** began recruiting **Minor Victim 1** to work for him as a prostitute despite knowing that **Minor Victim 1** was a minor. **JONES** required **Minor Victim 1** to turn over all, or most, of the money she earned from prostitution to **JONES**.

2. From a date not later than on or about December 11, 2013, through on or about January 2, 2014, at **JONES'S** direction and supervision, **Minor Victim 1** worked in the New Orleans, Louisiana area as a prostitute.

3. In about early January 2014, **JONES** met **Minor Victim 2** in Memphis, Tennessee and learned that **Minor Victim 2** was only 16 years old. Almost immediately, **JONES** began recruiting **Minor Victim 2** to work for him as a prostitute.

4. **Minor Victim 2** worked for **JONES** as a prostitute between about early January 2014 and about February 11, 2014. **JONES** required **Minor Victim 2** to turn over all, or most, of the money she earned from prostitution to **JONES**.

5. Beginning in about early January 2014 and continuing until about February 11, 2014, **JONES** caused **Minor Victim 2** to travel throughout Kentucky, Tennessee, and Louisiana for the purpose of **Minor Victim 2** engaging in prostitution.

6. On a date not later than January 12, 2014, **JONES** arranged for **Minor Victim 2** to travel to the New Orleans, Louisiana area to work as a prostitute.



7. From a date not later than January 12, 2014, through on or about February 11, 2014, at **JONES'S** direction and supervision, **Minor Victim 2** worked in the New Orleans, Louisiana area as a prostitute.

8. **JONES** and others known and unknown to the Grand Jury used facilities of interstate commerce, including vehicles, public highways, hotels, cellular telephones, and the Internet to facilitate commercial sex acts involving **Minor Victim 1** and **Minor Victim 2**.

9. **JONES** instructed **Minor Victim 1** and **Minor Victim 2** on, among other things, how much money to charge for particular sex acts, how to perform certain sex acts, what to do with the money they earned for performing commercial sex acts, how to solicit potential prostitution clients, including where and how to solicit them, and how to avoid detection by law enforcement authorities. **JONES** directed **Minor Victim 1** and **Minor Victim 2** in this manner in-person and by text message and phone call from a cellular telephone.

10. As part of his business, **JONES** directed **Minor Victim 1** and **Minor Victim 2** to operate on an "out call" basis, meaning that **Minor Victim 1** and **Minor Victim 2** would meet a customer at a location chosen by the customer, such as his residence or hotel room, and on an "in call" basis, meaning that the caller would meet **Minor Victim 1** and **Minor Victim 2** at a hotel rented and paid for by **Minor Victim 1**, **Minor Victim 2**, **JONES**, or one of **JONES'S** co-conspirators.

11. Between on or about December 11, 2013, and February 11, 2014, **JONES** and others known and unknown to the Grand Jury rented hotel rooms located in New Orleans, Louisiana, for **Minor Victim 1** and **Minor Victim 2** and others known and unknown to the Grand Jury to use for their "in-call" dates.

12. **JONES** provided **Minor Victim 1** and **Minor Victim 2** with condoms to use

when **Minor Victim 1** and **Minor Victim 2** worked as prostitutes.

13. As part of his business, **JONES** also directed **Minor Victim 1** and **Minor Victim 2** to solicit prospective prostitution customers “on the track,” specifically Bourbon Street, within the French Quarter area of New Orleans, Louisiana.

14. **JONES** created advertisements on an online classified ad service commonly used to advertise sexual services in exchange for money, through which **JONES**, **Minor Victim 1** and **Minor Victim 2**, and people known and unknown to the Grand Jury received telephone calls inquiring about, scheduling, and arranging prostitution calls with **Minor Victim 1** and **Minor Victim 2**.

15. Many of the advertisements for **Minor Victim 1** and **Minor Victim 2** on the online ad service were posted under the category of “escorts.” In truth and in fact, the advertisements were fronts for **JONES’S** illegal prostitution business. **JONES** used, and caused to be used, debit cards in his name to pay for prostitution advertisements for **Minor Victim 1** and **Minor Victim 2**.

16. On about December 14, 2013, **JONES** caused an advertisement to be created and posted on an online classified website specializing in products and services available in the New Orleans, Louisiana area. The advertisement was entitled, “1 of a kind Rare Find Worth The Time!!!! - 18,” and bore Post ID Number 9381026. The advertisement contained photographs of **Minor Victim 1** and stated that **Minor Victim 1** was “Fedish [sic] friendly.”

17. On about January 6, 2014, **JONES** caused an advertisement to be created and posted on an online classified website specializing in products and services available in the Louisville, Kentucky area. The advertisement was entitled, “New 2 The City Korean & Blk Beauty – 19,” and bore Post ID Number 6496435. The advertisement contained photographs of

**Minor Victim 2** and stated that **Minor Victim 2** was “more exciting and funfilled [sic] than average!” and was “fedish [sic] friendly.” The advertisement stated that **Minor Victim 2** was located in the Louisville area “for a limited time.”

18. On about January 12, 2014, **JONES** caused an advertisement to be created and posted on an online classified website specializing in products and services available in the New Orleans, Louisiana area. The advertisement was entitled, “If Yu Enjoy The Finer Things In Life Then Yu Will Love Us – 19,” and 9487568. The advertisement contained photographs of **Minor Victim 2** and stated that **Minor Victim 2** was “your Korean & Blac Beauty” who was “Pure Funsized Satisfaction.”

19. **JONES** instructed **Minor Victim 2** to steal credit cards, wallets, cash, and other valuables from prostitution customers.

20. **JONES** provided **Minor Victim 1** and **Minor Victim 2** with alcohol and illicit and mood-altering drugs, for the purpose of numbing their senses, controlling their behavior, rewarding them for engaging in acts of prostitution, and as a means of encouraging **Minor Victim 1** and **Minor Victim 2** to engage in acts of prostitution.

21. **JONES** threatened and intimidated **Minor Victim 1** and **Minor Victim 2**, causing **Minor Victim 1** and **Minor Victim 2** to feel trapped, despite their desire to cease working for **JONES** as a prostitute and to go home.

22. Specifically, as a means of controlling the behavior of **Minor Victim 1** and **Minor Victim 2** and to ensure their compliance with his instructions, **JONES** beat and punched **Minor Victim 1** and **Minor Victim 2**. Furthermore, **JONES** beat, punched, and choked other individuals known and unknown to the Grand Jury who worked for him as prostitutes in front of **Minor Victim 1** and **Minor Victim 2**.

23. Beginning not later than January 28, 2014, and continuing through at least February 4, 2013, **Minor Victim 2** told **JONES** that that she wanted to return to Memphis, Tennessee and stop working as a prostitute for him, that she could not handle the pressure, that she did not want **JONES** to beat her anymore, and that she was “freezing” and needed medicine for an illness. **JONES** responded that he would send her home once she earned enough “real” money (*i.e.*, more than \$200 or \$300) by performing prostitution dates.

24. On multiple occasions between about December 14, 2013, and January 2, 2014, **JONES** had forcible sexual intercourse with **Minor Victim 1**, with knowledge of her age, for the purpose of controlling **Minor Victim 1’s** behavior, demonstrating his dominance, and ensuring her compliance with his instructions

25. On multiple occasions between about January 8, 2014, and February 11, 2014, **JONES** had forcible sexual intercourse with **Minor Victim 2**, with knowledge of her age, for the purpose of controlling **Minor Victim 2’s** behavior, demonstrating his dominance, and ensuring her compliance with his instructions.

All in violation of Title 18, United States Code, Section 1594(c).

**COUNT 2**  
**(Sex Trafficking of Children)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations of Section A and C of Count 1 are hereby realleged and incorporated herein in their entirety.

**B. THE OFFENSE:**

Beginning at a time unknown, but not later than December 11, 2013, and continuing until on or about January 2, 2014, in the Eastern District of Louisiana, and elsewhere, the defendant, **TIMOTHY JONES, a/k/a “Lucci,” a/k/a “King Lucci,” a/k/a “Lucci Loco,”** 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, **Minor Victim 1**, a person who had not attained the age of 18 years, (1) 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 **Minor Victim 1** to engage in a commercial sex act, and (2) having had a reasonable opportunity to observe **Minor Victim 1**, knowing and in reckless disregard of the fact that **Minor Victim 1** had not attained the age of 18 years and that **Minor Victim 1** 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)(1), 1591(b)(2), 1594(a), and 2.

**COUNT 3**  
**(Sex Trafficking of Children)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations of Section A and C of Count 1 are hereby realleged and incorporated herein in their entirety.

**B. THE OFFENSE:**

Beginning at a time unknown, but not later than January 6, 2014, and continuing until on or about February 11, 2014, in the Eastern District of Louisiana, and elsewhere, the defendant, **TIMOTHY JONES, a/k/a “Lucci,” a/k/a “King Lucci,” a/k/a “Lucci Loco,”** 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, **Minor Victim 2**, a person who had not attained the age of 18 years, (1) 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 **Minor Victim 2** to engage in a commercial sex act, and (2) having had a reasonable opportunity to observe **Minor Victim 2**, knowing and in reckless disregard of the fact that **Minor Victim 2** had not attained the age of 18 years and that **Minor Victim 2** 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)(1), 1591(b)(2), 1594(a), and 2.

#### **COUNT 4**

##### **(Coercion and Enticement of an Individual to Travel to Engage in Prostitution)**

###### **A. AT ALL TIMES MATERIAL HEREIN:**

The allegations of Sections A and C of Count 1 are hereby realleged and incorporated herein in their entirety.

###### **B. THE OFFENSE:**

Beginning at a time unknown, but not later than January 6, 2014, and continuing until on or about February 11, 2014, in the Eastern District of Louisiana and elsewhere, the defendant, **TIMOTHY JONES, a/k/a "Lucci," a/k/a "King Lucci," a/k/a "Lucci Loco,"** knowingly persuaded, induced, enticed, and coerced, **Minor Victim 2** to travel in interstate commerce, that is, from Tennessee to Louisiana, to engage in prostitution and in sexual activity for which a person can be charged with a criminal offense, to wit: LA Rev. Stat. 14:80, LA Rev. Stat. 14:81.3, and LA Rev. Stat. 14:82.1, and aided and abetted such conduct.

All in violation of Title 18, United States Code, Sections 2422(a) and 2.

**COUNT 5**

**(Coercion and Enticement of a Minor to Engage in Illegal Sexual Activity)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations of Sections A and C of Count 1 are hereby realleged and incorporated herein in their entirety.

**B. THE OFFENSE:**

Beginning at a time unknown, but not later than January 8, 2014, and continuing through on or about February 11, 2014, in the Eastern District of Louisiana, and elsewhere, the defendant, **TIMOTHY JONES, a/k/a “Lucci,” a/k/a “King Lucci,” a/k/a “Lucci Loco,”** did knowingly use facilities and means of interstate commerce, to wit: a cellular telephone, a computer, and the Internet, to persuade, induce, entice, and coerce, and attempt to persuade, induce, entice, and coerce, **Minor Victim 2**, an individual who had not attained the age of eighteen (18) years, to engage in sexual activity for which a person can be charged with a criminal offense, to wit: LA Rev. Stat. 14:80, LA Rev. Stat. 14:81.3, and LA Rev. Stat. 14:82.1.

All in violation of Title 18, United States Code, Sections 2422(b) and 2.

**COUNTS 6-8**

**(Use of an Interstate Facility to Promote Prostitution)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations of Sections A and C of Count 1 are hereby realleged and incorporated herein in their entirety.

**B. THE OFFENSE:**

On or about the dates listed below, in the in the Eastern District of Louisiana, and elsewhere, the defendant, **TIMOTHY JONES, a/k/a “Lucci,” a/k/a “King Lucci,” a/k/a “Lucci Loco,”** 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 a crime of violence, Title 18, United States Code, Sections 1591(a) and 1591(b), and an unlawful activity, that is, prostitution offenses in violation of the laws of the State of Louisiana, LA Rev. Stat. 14:80, LA Rev. Stat. 14:81.3, LA Rev. Stat. 14:82, and LA Rev. Stat. 14:82.1, and thereafter performed and attempted to perform an act, to wit: posting advertisements for commercial sex acts on the website “Backpage.com,” to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of such unlawful activity:

| Count | Date of Advertisement | Post ID |
|-------|-----------------------|---------|
| 6     | December 14, 2013     | 9381026 |
| 7     | January 12, 2014      | 9487568 |
| 8     | January 27, 2014      | 9547412 |

All in violation of Title 18, United States Code, Sections 1592(a)(2), 1592(a)(3), and 2.

**NOTICE OF FORFEITURE FOR SEX TRAFFICKING OF CHILDREN**

1. The allegations of Counts 1 through 3 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 1594(d).

2. As a result of the offenses alleged in Counts 1 through 3, **TIMOTHY JONES, a/k/a “Lucci,” a/k/a “King Lucci,” a/k/a “Lucci Loco,”** shall forfeit to the United States pursuant to Title 18, United States Code, Section 1594(d), any and all property constituting or



derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Count 1 through 3 of this Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 1594(d).

#### **NOTICE OF FOREFEITURE FOR COERCION AND ENTICEMENT**

1. The allegations of Counts 4 through 5 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 2428.

2. As a result of the offenses alleged in Counts 4 through 5, **TIMOTHY JONES, a/k/a "Lucci," a/k/a "King Lucci," a/k/a "Lucci Loco,"** shall forfeit to the United States pursuant to Title 18, United States Code, Section 2428, any and all property constituting or

derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts 4 through 5 of this Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 2428.

**NOTICE OF FORFEITURE FOR USE OF AN INTERSTATE  
FACILITY TO PROMOTE PROSTITUTION**

1. The allegations of Counts 6 through 8 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1952 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 6 through 8, the defendant, **TIMOTHY JONES, a/k/a "Lucci," a/k/a "King Lucci," a/k/a "Lucci Loco,"** shall forfeit to the United States pursuant to Title 18, United States Code, Sections 1952 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1952.

3. If any of the property subject to forfeiture, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

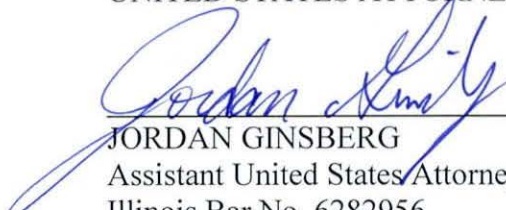


All in violation of Title 18, United States Code, Sections 1952 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

KENNETH ALLEN POLITE, JR.  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
JORDAN GINSBERG  
Assistant United States Attorney  
Illinois Bar No. 6282956

New Orleans, Louisiana  
July 10, 2015