UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

FILED

2015 APR -7 P 12: 15

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UNITED STATES OF AMERICA)	NO. 3:15-CR- <u>59</u>	1
v.)	JUDGES Jordan/ Guyton DEPT CO	1.2.2
MARCUS WASHINGTON)	1 1	

INDICTMENT

The Grand Jury charges:

COUNT ONE

Between in or about August 2013 and continuing through in or about September 2013, in the Eastern District of Tennessee, the defendant,

MARCUS WASHINGTON

did, in and affecting interstate or foreign commerce, knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, that is A.S., knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion would be used to cause A.S. to engage in a commercial sex act, and attempted to do so.

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

COUNT TWO

Between in or about August 2013 and continuing through in or about September 2013, in the Eastern District of Tennessee, the defendant,

MARCUS WASHINGTON

did, in and affecting interstate or foreign commerce, knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, that is K.C., knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion would be used to cause K.C. to engage in a commercial sex act, and attempted to do so.

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

COUNT THREE

Beginning in or about April 2013 and continuing to in or about September 2013, in the Eastern District of Tennessee, the defendant,

MARCUS WASHINGTON

did knowingly, intentionally, and without authority combine, conspire, and agree with other persons both known and unknown to the Grand Jury, to commit the following offenses against the United States: to possess with intent to distribute and to distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and to possess with intent to distribute and to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, both constituting violations of the provisions of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(C).

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COUNT FOUR

On or about September 24, 2013 through on or about September 25, 2013, in the Eastern District of Tennessee, the defendant,

MARCUS WASHINGTON

did knowingly, intentionally, and without authority possess with the intent to distribute a

quantity of a mixture and substance containing a detectable amount of oxycodone, a Schedule II

controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

A TRUE BILL:

DATE:

FOREPERSON OF THE GRAND JURY

WILLIAM C. KILLIAN United States Attorney Eastern District of Tennessee

VANITA GUPTA Acting Assistant Attorney General United States Department of Justice Civil Rights Division

BY:

NICHOLAS DURHAM Trial Attorney, Civil Rights Division United States Department of Justice

BROOKLYN SAWYERS

Assistant United States Attorney Eastern District of Tennessee