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2 United States Attorney

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RICHARD W. BUEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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5 **SEALED**
6 **BY COURT ORDER**

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

CRB

11
12 UNITED STATES OF AMERICA, **CR 11 0697**

13 Plaintiff,

14 v.

15 RODERICK HAROLD BOLDS,
16 Defendant.

VIOLATIONS: 18 U.S.C. §§ 1591(a)(1)
and 3559(e) – Sex Trafficking of Children or
by Force; 18 U.S.C. § 2423(a) and 3559(e) –
Transportation of Minors with Intent to
Engage in Criminal Sexual Activity; 18
U.S.C. §§ 1594(e)(1) and 2428 – Criminal
Forfeiture

SAN FRANCISCO VENUE

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18
19
20 INDICTMENT

21 The Grand Jury charges:

22 COUNT ONE: (18 U.S.C. § 1591(a)(1) – Sex Trafficking of Children or by Force)

23 Beginning on or about July 3, 2011, and continuing until July 11, 2011, in the Northern
24 District of California, the defendant,

25 RODERICK HAROLD BOLDS,

26 in and affecting interstate commerce, did knowingly recruit, entice, harbor, transport, provide,
27 obtain, and maintain by any means, a person, to wit: a minor female victim identified as “S.G.,”
28 knowing and in reckless disregard of the fact that means of force, threats of force, fraud,

INDICTMENT

1 coercion, and any combination of such means, would be used to cause the person to engage in a
2 commercial sex act, and knowing and in reckless disregard of the fact that the person had not
3 attained the age of 18 years and would be caused to engage in a commercial sex act, in violation
4 of Title 18, United States Code, Sections 1591(a)(1) and 3559(e).

5
6 COUNT TWO: (18 U.S.C. § 2423(a) – Transportation of Minors with Intent to Engage in
7 Criminal Sexual Activity)

8 On or about July 3, 2011, in the Northern District of California, the defendant,
9
10 Roderick Harold Bolts,
11 did knowingly transport an individual who had not attained the age of 18 years, to wit: a minor
12 female victim identified as “S.G.,” in interstate commerce, with the intent that such individual
13 engage in prostitution and any sexual activity for which any person can be charged with a
14 criminal offense, in violation of Title 18, United States Code, Sections 2423(a) and 3559(e).

15 FORFEITURE ALLEGATIONS: (18 U.S.C. §§ 1594(e)(1) and 2428 – Criminal Forfeiture)

16 Upon conviction of the offenses alleged herein, the defendant,
17
18 Roderick Harold Bolts,
19 shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 1594(e)(1)
20 and 2428, all property used or intended to commit or facilitate the commission of the offense,
21 and all property derived from proceeds traceable to the commission of the offense.

22 SPECIAL ALLEGATION: (18 U.S.C. § 3559(e) – Enhancement for Prior Sex Offense)

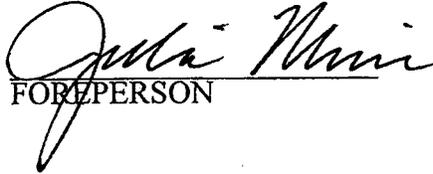
23 The defendant,
24
25 Roderick Harold Bolts
26 has a prior sex conviction for a State sex offense; to wit, on April 19, 2005, the defendant was
27 convicted of violating California Penal Code Section 261.5(c), Unlawful Sexual Intercourse with
28 a Minor, a crime that is punishable by more than one year in prison, that involved a minor who
had not attained the age of 17 years, and that involved conduct that would have been a Federal

1 sex offense had it occurred in any commonwealth, territory, or possession of the United States,
2 within the special maritime and territorial jurisdiction of the United States, in a Federal prison, on
3 any land or building owned by, leased to, or otherwise used by or under the control of the
4 Government of the United States, or in the Indian country, within the meaning of Title 18, United
5 States Code, Section 3559(e)(1).

6 DATED:

A TRUE BILL.

7 *Sept 27, 2011*

8 
FORPERSON

9 MELINDA HAAG
United States Attorney

10 
11 *MIRANDA KANE STROTH For Kane*
12 Chief, Criminal Division

13 (Approved as to form: )

AUSA MARTIKAN