

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 13-
: :
: 18 U.S.C. § 1594(c)
v. :
: :
: :
VARIAN CHARLES :
a/k/a "Bob" :

I N D I C T M E N T

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

1. At all times relevant to this Indictment, a minor
female, "S.C.," was a victim of the crimes alleged herein.

"S.C." resided in Tennessee and was born in 1996.

Manner and Means of the Conspiracy

2. It was part of the conspiracy that the defendant,
VARIAN CHARLES, a/k/a "Bob," and others received monies and other
things of value by having "S.C." engage in commercial sex acts.

3. It was further part of the conspiracy that the
defendant, VARIAN CHARLES, a/k/a "Bob," and others arranged for
the transportation of and transported "S.C." from New York to
Philadelphia, Pennsylvania, with the intent that "S.C." would
engage in prostitution.

4. It was further part of the conspiracy that the
defendant, VARIAN CHARLES, a/k/a "Bob," and others forced "S.C."
to engage in commercial sex acts with various individuals.

5. It was further part of the conspiracy that the defendant, VARIAN CHARLES, a/k/a "Bob," and others received money in exchange for the sex acts performed by "S.C."

6. It was further part of the conspiracy that the defendant, VARIAN CHARLES, a/k/a "Bob," and others subjected "S.C." to physical abuse.

Overt Acts in Furtherance of the Conspiracy

7. In furtherance of the conspiracy, and to effect its unlawful object, the defendant, VARIAN CHARLES, a/k/a "Bob," and others committed the following overt acts in the District of New Jersey and elsewhere:

a. Prior to on or about August 13, 2011, an unindicted co-conspirator took a picture of "S.C." while she was posing in lingerie and sent the photograph to the defendant, VARIAN CHARLES, a/k/a "Bob."

b. On or about August 12, 2011, the same unindicted co-conspirator threatened "S.C." that, if she did not agree to leave New York with him, her family would be harmed.

c. On or about August 13, 2011, the same unindicted co-conspirator took "S.C." from New York State to Philadelphia, Pennsylvania, via public transportation. Public transportation records show that the unindicted co-conspirator and "S.C." traveled through New Jersey en route from New York to Philadelphia.

d. On or about August 13, 2011, the day that the unindicted co-conspirator took "S.C." from New York to Philadelphia, the unindicted co-conspirator and the defendant, VARIAN CHARLES, a/k/a "Bob," were in communication via cellular phone. Cellular telephone records show an excess of fifteen calls between them.

e. On or about August 13, 2011, when the unindicted co-conspirator and "S.C." arrived in Philadelphia, the defendant, VARIAN CHARLES, a/k/a "Bob," was there to meet them. The defendant, VARIAN CHARLES, a/k/a "Bob," drove the unindicted co-conspirator and "S.C." back to his house.

8. From in or about August 2011 through in or about September 2011, in the District of New Jersey, and elsewhere, the defendant,

VARIAN CHARLES, a/k/a "Bob," did knowingly and intentionally conspire and agree with others to recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, "S.C.," knowing and in reckless disregard of the fact that "S.C." had not attained the age of 18 years and that "S.C." would be caused to engage in a commercial sex act.

Contrary to Title 18, United States Code, Section 1591(a), all in violation of Title 18, United States Code, Section 1594(c).

FIRST FORFEITURE ALLEGATION

1. The allegations contained in all paragraphs of this Indictment are hereby realleged and incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 1594(d) and (e).

2. The United States hereby gives notice to the defendant that, upon conviction of the offense alleged in this Indictment, the United States will seek forfeiture, in accordance with Title 18, United States Code, Sections 1594(d) and (e), of (a) any property, real or personal, that was used or intended to be used to commit or facilitate the commission of such offense; and (b) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such offense.

SECOND FORFEITURE ALLEGATION

1. The allegations contained in all paragraphs of this Indictment are hereby realleged and incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to the defendant that, upon conviction of the offense alleged in this Indictment, the United States will seek forfeiture in accordance with Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violation of Title 18, United States Code, Section 1594, alleged in this Indictment.

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 will 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).

A TRUE BILL

FOREPERSON



PAUL J. FISHMAN
United States Attorney