
United States District Court
District of New Jersey

UNITED STATES OF AMERICA : Hon. Cathy L. Waldor
v. :
: Magistrate No. 13-7175
Varian Charles, :
a/k/a "Bob," : **CRIMINAL COMPLAINT**
Wilbur Senat, :
a/k/a "Wilby," :
Karl Venord, :
a/k/a "Dreadhead," and :
Samuel Verrier, :
a/k/a "Dre" :

I, Vernon Addison, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.



Vernon Addison, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
July 19, 2013, at Newark, New Jersey



HONORABLE CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Count One

(Conspiracy to Engage in Sex Trafficking of Minors)

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

VARIAN CHARLES, a/k/a "Bob," and
WILBUR SENAT, a/k/a "Wilby,"

conspired with each other and others to knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate and foreign commerce, a person, namely, "Victim #1," knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe "Victim #1," that "Victim #1" had not attained the age of 18 years and that "Victim #1" would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, Section 1594(c).

Count Two

(Conspiracy to Engage in Sex Trafficking of Minors)

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

KARL VENORD, a/k/a "Dreadhead," and
SAMUEL VERRIER, a/k/a "Dre,"

conspired with each other and others to knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate and foreign commerce, a person, namely, "Victim #1," knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe "Victim #1," that "Victim #1" had not attained the age of 18 years and that "Victim #1" would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, Section 1594(c).

ATTACHMENT B

I, Vernon Addison, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Since this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Introduction

At all times relevant to this Complaint:

1. Defendant Varian Charles, a/k/a "Bob," was a resident of Philadelphia, Pennsylvania.
2. Defendant Wilbur Senat, a/k/a "Wilby," was a resident of Haverstraw, New York.
3. Defendant Karl Venord, a/k/a "Dreadhead," was a resident of Philadelphia, Pennsylvania.
4. Defendant Samuel Verrier, a/k/a "Dre," was a resident of Philadelphia, Pennsylvania.

The Minor Sex Trafficking Victim

5. At all times relevant to this Complaint, a minor female, "Victim #1," was a victim of the crimes alleged herein. The minor female was a resident of Tennessee, was under the age of eighteen, and was born in .

The CHARLES and SENAT Conspiracy (Count I)

6. In or about the summer of 2011, Victim #1 was staying with family members who lived in Haverstraw, New York. During this period, Victim #1 met defendant WILBUR SENAT, a/k/a "Wilby" ("SENAT") in Haverstraw. During their first meeting, SENAT asked Victim #1 how old she was and Victim #1 told SENAT that she was 15 years old.

7. In or about August 2011, Victim #1 agreed to accompany SENAT to a motel in Nyack, New York. At the motel, SENAT forced Victim #1 to engage in commercial sex acts with various individuals. These individuals paid SENAT money in exchange for the sex acts performed by Victim #1.

8. In or about August 2011, SENAT threatened Victim #1 that her family would be harmed if she did not agree to go to accompany him to Philadelphia. As a result of SENAT's threats, Victim #1 agreed to accompany SENAT to Philadelphia.

9. Shortly after SENAT's threats against Victim #1 and her family, Victim #1 and SENAT traveled together from New York to Philadelphia via public transportation. Based on law enforcement's analysis of cellular telephone and other records, it was determined that SENAT and Victim #1 traveled through New Jersey en route to Philadelphia from New York.

10. Upon arriving in Philadelphia, Victim #1 and SENAT were greeted by defendant VARIAN CHARLES, a/k/a "Bob" ("CHARLES"). A review of cellular telephone records also reveals that SENAT and CHARLES were in contact with each other on the date of SENAT and Victim #1's travel to Philadelphia. Law enforcement also spoke to an associate of CHARLES, who stated that, prior to SENAT and Victim #1's arrival in Philadelphia, SENAT sent a picture of Victim #1 to CHARLES, who in turn shared the picture with the associate.

11. CHARLES drove them to his house, also in Philadelphia, where CHARLES and SENAT forced Victim #1 to remain in the poorly-lit and uninhabitable basement. SENAT and CHARLES then forced Victim #1 to engage in commercial sex acts with various individuals. These individuals paid SENAT and CHARLES money in exchange for the sex acts performed by Victim #1.

12. Victim #1 lived at CHARLES' house for approximately two days. While she lived at CHARLES' house, she was subjected to physical abuse by both CHARLES and SENAT.

13. At all times relevant to the Complaint, SENAT and CHARLES had reasonable opportunity to observe Victim #1 and recklessly disregarded the fact that she was under the age of eighteen.

The VERRIER and VENORD Conspiracy (Count II)

14. While Victim #1 was living at CHARLES' house, she met defendant SAMUEL VERRIER, a/k/a "Dre" ("VERRIER"). Shortly after they met, VERRIER told CHARLES that Victim #1 would no longer work for CHARLES and would instead work for VERRIER. VERRIER then brought Victim #1 to "work" at various clubs in Philadelphia for him. VERRIER instructed Victim #1 to engage in commercial sex acts with club patrons in exchange for money, and then demanded that she turn over a portion of the proceeds to VERRIER.

15. After Victim #1 began working for VERRIER, VERRIER introduced Victim #1 to various acquaintances who were aware that VERRIER was using Victim #1 to engage in commercial sex acts for his financial gain. Victim #1 told these acquaintances that she was

under eighteen years old. At least one of these acquaintances told VERRIER that Victim #1 was under eighteen years old.

16. In or around late August 2011, after Victim #1 had begun working for VERRIER, VERRIER introduced Victim #1 to defendant Karl Venord, a/k/a "Dreadhead" ("VENORD"). Shortly after Victim #1 met VENORD, VENORD and VERRIER asked Victim #1 to accompany them to Bordentown, New Jersey. Victim #1 agreed to accompany them, because Victim #1 was told that VENORD and VERRIER would allow Victim #1 to visit Victim #1's family member, who lived in New Jersey.

17. During the drive from Philadelphia to New Jersey, VERRIER and VENORD told Victim #1 that Victim #1 was to help VENORD and VERRIER blackmail an individual ("Individual A") in New Jersey. Specifically, VERRIER and VENORD told Victim #1 they wanted Victim #1 to have sex with Individual A and take photographs of him. VERRIER and VENORD planned to then use the photographs to extort money from Individual A.

18. Shortly after arriving in Bordentown, VERRIER, VENORD, and Victim #1 located Individual A outside a bank. At VERRIER and VENORD demand, Victim #1 attempted to make an introduction to Individual A, but Individual A resisted Victim #1's attempts to engage him in conversation.

19. At all times relevant to the Complaint, VERRIER, and VENORD had reasonable opportunity to observe Victim #1 and recklessly disregarded the fact that she was under the age of eighteen.