UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA		*	CRIMINAL N	0.: 13-2	286
v.		ŵ	SECTION: "R'	" (1)	
CHRISTOPHER WILLIAMS, aka "Gutter"		*		EAST	U.S. DISTRICT COURT ERN DISTRICT OF LOUISIANA
ana Gunes		ń		FILED	APR 20 2015
	*	*	*		WILLIAM W. BLEVINS CLERK
	FACTUAL BASIS			L	pur

The Defendant, CHRISTOPHER WILLIAMS, aka "Gutter," ("WILLIAMS"), agreed to plead guilty to one count of conspiracy to commit sex trafficking (18 U.S.C. § 1591), in violation of 18 U.S.C. § 1594(c), as charged in Count One of the Second Superseding Indictment. If this matter were to go to trial, the Defendant agrees that the Government would prove, through the introduction of competent testimony and admissible tangible exhibits, the following facts beyond a reasonable doubt:

Sometime in or about 2012, the Defendant, WILLIAMS drove from Memphis, Tennessee, across state lines to New Orleans, Louisiana, for the purpose of forcing and coercing women to engage in commercial sex acts. WILLIAMS forced and coerced several adult women, including Y.W., S.T., A.W., and M.P., to prostitute for him. WILLIAMS had many rules that he required the women to follow. The women referred to him as their "Daddy," and had to show him respect. The women were not allowed to speak to or even look at another pimp. WILLIAMS required the women to make a certain amount of money each day by engaging in commercial sex acts. During the weekday, he generally required them to make at least \$500, and on weekends, he typically made them earn at least \$800. If women did not meet these quotas, WILLIAMS would order them to continue soliciting customers. WILLIAMS took all of the money that the women earned. WILLIAMS used his cellular telephone to stay in contact with the women, in order to monitor their movements and their commercial sex activity. WILLIAMS intentionally tried to impregnate the women he forced to prostitute, because he thought that it would be harder for the women to leave him if they had a child with him. If the women did not obey his rules or if they failed to show him respect, they would have to face consequences from WILLIAMS, which included ignoring them, keeping their children away from them, and beating them. WILLIAMS would punch and kick the women for infractions of his rules. However, he would deliberately hit them on parts of their body where the bruises would not be visible, so that the women would not draw the attention of police or deter potential customers.

WILLIAMS knew co-defendant, Laquentin Brown ("Brown"), from Memphis, Tennessee. Brown would ask WILLIAMS for advice about the best ways to pimp women. WILLIAMS and the women that he forced to prostitute would occasionally stay at Brown's house. Further, when WILLIAMS went to jail for a period of time, he asked Brown to take over WILLIAMS' role as pimp and to "watch" Y.W., who was one of the women that Williams had been forcing and coercing to engage in commercial sex acts. While in New Orleans, WILLIAMS and Brown often stayed at the Rivera Motel. There, WILLIAMS saw co-defendants, Granville Robinson ("Robinson"), Duane Phillips ("Phillips"), and Anthony Ellis ("Ellis"), whom he knew were also pimps. WILLIAMS knew that his coconspirators also enforced rules for the women they pimped. The women were not allowed to call the co-conspirators by their name. Instead, the women referred to them as their "Daddy," in order to show the co-conspirators "respect." If a woman worked for one pimp, she was not allowed to speak to or even look at another pimp. Typically, the pimps took identification cards away from the women, in part, to keep them from leaving. The co-conspirators required the women to earn a certain amount of money each day by engaging in commercial sex acts, and they kept the money that the women earned. If the women did not earn enough money, or broke any of the other rules, they would have to face consequences from the co-conspirators. The consequences included being forced to stay outside the hotel rooms and continue to solicit customers for commercial sex acts; having food withheld from them; and being beaten.

WILLIAMS, Brown, Robinson, Phillips, and Ellis stayed at the Riviera Motel because they knew that the hotel staff would not stop them from forcing and coercing the women to engage in commercial sex acts. At these hotels, the co-defendants would rent multiple rooms where the women would meet with customers. The hotel staff would charge the co-defendants a higher rate than the general public to compensate for the increased traffic they brought into the hotel. The hotel staff did not call the police when they saw the co-defendants assault women, nor did they call the police when women asked them for help. Case 2:13-cr-00286-SSV-SS Document 190 Filed 04/20/15 Page 4 of 4

Both the Government and the Defendant, CHRISTOPHER WILLIAMS, do hereby stipulate and agree that the above facts are true, and that they set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty.

(Date)

CHRISTOPHER WILLIAMS Defendant

COTTON RICHMOND JOHN (Date)

Special Litigation Counsel Human Trafficking Prosecution Unit **Civil Rights Division** U.S. Department of Justice

JOHN

Counsel for Defendant

120/15 CHRISTINE M. SISCARETTI (Date)

Trial Attorney, Civil Rights Division U.S. Department of Justice

10-15 Date)

JULI Assistant United States Attorney