UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

V. * SECTION: "R" (1)

ANTHONY ELLIS, * EASTERN DISTRICT OF LOUISIANA aka "Animal" * FILED APR 20 2015

WILLIAM W. BLEVINS CLERK

FACTUAL BASIS

The Defendant, ANTHONY ELLIS, aka "Anthony Deshun Lloyd," aka "Animal," aka "AD," ("ELLIS"), 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. § 371, and one count of Transportation for Purposes of Engaging in Prostitution, in violation of 18 U.S.C. § 2421, as charged in the Superseding Bill of Information. 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 Spring 2013, the Defendant, ELLIS, became a pimp. Codefendant Granville Robinson, aka "Bear," aka "HB," ("Robinson"), who is Defendant ELLIS' uncle, encouraged ELLIS to become a pimp, and explained the rules of pimping to ELLIS.

Sometime in or about Spring 2013, ELLIS and Robinson traveled from Memphis, Tennessee, to New Orleans, Louisiana, for the purpose of forcing and coercing women to engage in commercial sex acts. Robinson introduced ELLIS to co-defendants Christopher Williams, aka "Gutter," ("Williams"), and Laquentin Brown, aka "Nino," ("Brown"). ELLIS already knew co-defendant Duane Phillips, aka "P-nut," ("Phillips"), who was from the same

neighborhood in Memphis. **ELLIS** knew that Williams, Brown, and Phillips were also pimps who were forcing and coercing women to engage in commercial sex acts in New Orleans.

ELLIS learned that the co-defendants and other pimps enforced rules for the women who they forced and coerced to engage in commercial sex acts. The women had to show the co-defendants "respect." They were not allowed to call the co-defendants by their names; instead, they had to call them "Daddy." If a woman worked for one of the co-defendants, she was not allowed to speak to or look at the others. The co-defendants took identification cards away from the women, in part, to make it more difficult for them to leave. The co-defendants required the women to earn a certain amount of money each day by engaging in commercial sex acts. The co-defendants kept the money that the women earned. Sometimes, the pimps would advertise the women for commercial sex acts on www.backpage.com. If the women did not earn enough money or broke any other rules, they would face consequences from the co-defendants, which included beatings and being forced to stay out and continue to engage in commercial sex acts. In particular, ELLIS learned that Robinson hit one woman with a glass coffee pot on one occasion, and that he beat another woman badly with a piece of wood on another occasion. ELLIS and the other pimps would talk to each other about how they would beat the women, and they would joke about the beatings.

ELLIS forced and coerced multiple adult women to engage in commercial sex acts in New Orleans and elsewhere, by applying the "rules" that he learned from the co-defendants and other pimps. ELLIS would use www.facebook.com to identify and recruit women, and he would trick the women into believing that he was interested in having a relationship with them. He would then force and coerce the women to engage in commercial sex acts. ELLIS required

the women to show him respect. The women called him "Daddy," and ELLIS called the women "bitches" and "hoes." ELLIS did not allow the women to talk to or look at other pimps, and he regulated their access to social media. At times, ELLIS kept the identification cards of the women as well as birth certificates of their children, in part, because it made it more difficult for them to leave him. ELLIS gave the women a quota that they had to earn each day from engaging in commercial sex acts, and he collected all of the money that the women earned. He required the women to use condoms with customers. If a woman did not earn enough money by engaging in commercial sex acts, ELLIS would order her to continue engaging in commercial sex acts. ELLIS used his cellular telephone to keep in contact with the women as they met with customers for commercial sex acts. He would also advertise the women for commercial sex acts on www.backpage.com.

On several occasions, **ELLIS** physically assaulted or otherwise punished women because they broke one of his rules. In one incident, **ELLIS** used an extension cord to whip a woman because she had talked to another pimp.

On one occasion, ELLIS brought S.G., an adult woman who he met through Phillips, from New Orleans, Louisiana, to Houston, Texas, for the purpose of forcing and coercing S.G. to engage in commercial sex acts. During the trip to Houston, S.G. "disrespected" ELLIS in front of some of the other pimps. Robinson told ELLIS to teach S.G. a lesson. ELLIS ordered S.G. to stand in the corner of the room or else "he would knock her out." ELLIS made her stand in the corner for several hours, and he refused to let her eat for eight or nine hours. ELLIS punished S.G. to show her that he was in charge.

ELLIS also assisted co-defendant Robinson by bonding him out of jail. While Robinson was incarcerated, ELLIS also watched Robinson's women, told the women to continue engaging in commercial sex acts, and collected the money that they earned, which he then gave to Robinson.

When in New Orleans, ELLIS, Phillips, Robinson, Williams, and Brown stayed in certain motels, where they forced and coerced the women to engage in commercial sex acts. At these hotels, the co-defendants would rent multiple rooms, where the women would then meet with customers. Frequently, the hotel staff would charge the co-defendants a higher rate than the general public to compensate them for the increased traffic they brought into the hotel. The hotel staff did not call the police to report the activities of **ELLIS** or the co-defendants.

Both the Government and the Defendant, ANTHONY ELLIS, 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.

Defendant

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