

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FACTUAL BASIS

UNITED STATES OF AMERICA	*	CRIMINAL NO. 13-279
v.	*	SECTION: "E"
TAUREAN OKEITH JACKSON	*	
(a/k/a/ "Marvelous Rich")	*	
(a/k/a "Richard Jones")	*	
(a/k/a "Richard Marvelously")	*	
	*	
	*	
	*	

The defendant, **TAUREAN OKEITH JACKSON** (hereinafter, the "defendant" or "**JACKSON**"), has agreed to plead guilty as charged to Counts 1 and 5 of the Indictment currently pending against him, charging him with conspiracy to commit sex trafficking of a minor, in violation of Title 18, United States Code, Section 1594(c) (Count 1), and obstruction and attempted obstruction of enforcement of Title 18, United States Code, Section 1591, in violation of Title 18, United States Code, Section 1591(d) (Count 5). Should this matter proceed to trial, both the Government and the defendant, **TAUREAN OKEITH JACKSON**, do hereby stipulate and agree that the following facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty. The Government and the defendant further stipulate that the Government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts beyond a reasonable doubt to support the allegations in the

24

Indictment now pending against the defendant:

Introduction

The Government would show that, at all times mentioned in the Indictment, **TAUREAN OKEITH JACKSON ("JACKSON")** (a/k/a "**Marvelous Rich,**" a/k/a "**Richard Jones,**" a/k/a "**Richard Marvelously**"), was an adult male who resided in the Dallas, Texas area.

The Government would further show that, at all times mentioned in the Indictment, **A.B.** was an adult female who resided in the Dallas, Texas area.

The Government would show that, at all times mentioned in the Indictment, **Minor Victim 1** was a juvenile female who was born in about January 1997, and who resided in the Mesquite, Texas area.

The Government would present eyewitness testimony and documentary evidence that in about 2012, **JACKSON** created, and subsequently operated, "Star City Vixens," an escort agency that was a front for prostitution activity. Star City Vixens had a registered business address of 1499 Regal Row, Dallas, Texas, and claimed to offer a variety of prostitution-based employment. Star City Vixens advertised "upscale adult entertainment" and stated that its "team members" would have the opportunity to travel to "major social events" throughout the country, including the Super Bowl, the NBA All-Star game, and other major sporting and entertainment events. **JACKSON** recruited **A.B.** to join "Star City Vixens." and shortly thereafter **JACKSON** became **A.B.**'s pimp and arranged for her to engage in sexual acts with others in exchange for money.

The Government would further present eyewitness testimony and documentary evidence that **JACKSON** created advertisements on an online classified ad service commonly used to advertise sexual services in exchange for money, through which **JACKSON** received telephone

19

calls inquiring about, scheduling, and arranging prostitution calls with **A.B., JACKSON** scheduled the time, location, and other logistics of each prostitution date.

Minor Victim 1

The Government would present the testimony of eye witnesses and, further, introduce recorded statements and documentary evidence that in about June 2013, **JACKSON** and **A.B.** met **Minor Victim 1** in the Dallas, Texas area. Shortly after their meeting, **JACKSON** and **A.B.** jointly recruited **Minor Victim 1** to begin working for **JACKSON** as a prostitute. As part of his recruitment process, **JACKSON** showed **Minor Victim 1** a video he had recorded and uploaded to Youtube.com. The video, narrated primarily by **JACKSON**, advertised **JACKSON'S** radio program, and his prostitution business, "Star City Vixens," depicted the purportedly glamorous life of a prostitute, and showed **JACKSON** and **A.B.** in a hotel room, riding around the streets of Dallas, Texas in a limousine, drinking champagne, and eating a heaping plate of nachos.

JACKSON required **Minor Victim 1** to turn over all, or most, of the money she earned from prostitution.

The Government would present documentary evidence and eyewitness testimony that **JACKSON** and **A.B.** took **Minor Victim 1** by car throughout Texas and Louisiana, including to Fort Worth, Texas, San Antonio, Texas, Austin, Texas, and Baton Rouge, Louisiana, with the intent that **A.B.** and **Minor Victim 1** engage in prostitution acts.

The Government would further introduce testimony from **Minor Victim 1** and **A.B.** that **JACKSON** arranged for **Minor Victim 1** to watch **A.B.** engage in prostitution acts with clients as a means of educating **Minor Victim 1** on the best way to perform sexual acts.

The Government would further present documentary evidence and eyewitness testimony

Detectives with the Jefferson Parish Sheriff's Office, as well as Special Agents with the Federal Bureau of Investigation (FBI) would testify, and documentary evidence would be introduced to show that on or about July 10, 2013, law enforcement agents identified an advertisement for suspected prostitution services posted on an online classified website. The advertisement was entitled "GORGEOUS-CURVES-SEXXY-GIRL NEXXT DOOR-25." and bore Post ID Number 7960316. The advertisement stated that the female "date" was "ready and more than willing to fulfill all of your erotic needs and desires." A law enforcement official, acting in an undercover capacity, arranged a "date" that involved prostitution services to take place at a hotel located in Metairie, Louisiana, by contacting (214) 735-5277, the telephone number listed on the advertisement.

Detectives with the Jefferson Parish Sheriff's Office and Special Agents with the FBI would testify that on about July 10, 2013, law enforcement officials arrived at the hotel located in Metairie, Louisiana where the undercover "date" had been scheduled, and arrested **Minor Victim 1** and **A.B.**

Obstruction and Attempted Obstruction of Enforcement of 18 U.S.C. § 1591

The Government would establish, through the introduction of documentary evidence and eyewitness testimony, that on or about July 15, 2013, **JACKSON** was arrested in the Dallas, Texas area because of a valid arrest warrant issued out of Jefferson Parish, Louisiana, based on his involvement in the matter detailed above.

The Government would further establish, through the introduction of documentary evidence, including recordings of phone calls, that in telephone calls **JACKSON** made while in custody between July 15, 2013, and July 26, 2013, both in the Dallas, Texas area and after his

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extradition to the New Orleans, Louisiana area, **JACKSON** requested and directed several of his close friends and immediate family members, including his sister, mother, grandmother, and daughter, to delete social media accounts and multiple Google e-mail (“G-mail”) accounts through which **JACKSON** recruited prospective “team members” to join Star City Vixens, posted and paid for online classified advertisements in numerous cities (as described *supra.* at 2, 4), and arranged prostitution “dates” based on responses to the advertisements. Among the accounts **JACKSON** sought to have “cleaned” were e-mail accounts related to Star City Vixens. **JACKSON** also directed his family members to delete certain videos he had posted on various websites, including the video described *supra.* at 3.

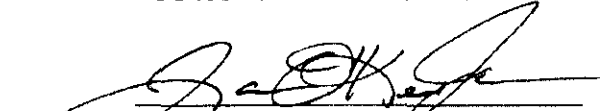
The Government would further establish, through recorded phone calls and eyewitness testimony, that on about July 23, 2013, **JACKSON** directed an immediate relative, **T.J.**, to destroy a white laptop computer believed to contain records and materials related to his trafficking of Minor Victim 1.

The Government would further establish, through recorded phone calls and eyewitness testimony **JACKSON** also instructed individuals, including his mother, grandmother, and **A.B.**, to create a false alibi for him, namely that he did not know **Minor Victim 1** and was not present in the New Orleans area with **A.B.** and **Minor Victim 1** between July 7, 2013, and July 10, 2013.

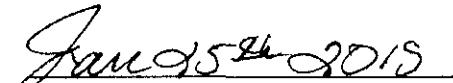


The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from, Special Agents from the FBI, Detectives from the Jefferson Parish Sheriff's Office, other witnesses, and documents and electronic devices in the possession of the FBI.



APPROVED AND ACCEPTED:




TAUREAN OKEITH JACKSON
Defendant

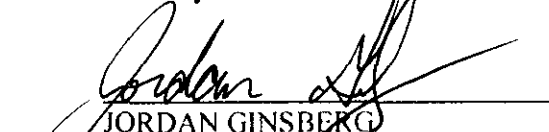


Date



for  Bar #19464
MARTIN E. REGAN, JR., ESQ.
(Louisiana Bar No. _____)
Attorney for Defendant Jackson



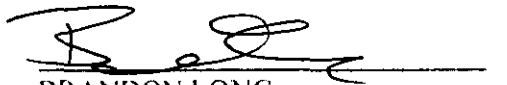
Date




JORDAN GINSBERG
(Illinois Bar. No. 6282956)
Assistant United States Attorney



Date



BRANDON LONG
(District of Columbia Bar. No. 500721)
Assistant United States Attorney



Date