## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

# INDICTMENT FOR SEX TRAFFICKING AND USE OF AN INTERSTATE FACILITY TO PROMOTE PROSTITUTION

UNITED STATES OF AMERICA	*	CRIMINAL NO.:
<b>v.</b>	*	SECTION:
DAVID MICHAEL WHITE, JR. a/k/a "Prince Loyalty"	*	VIOLATIONS: 18 U.S.C. § 1591(a) and (b) 18 U.S.C. § 1952(a)(3)

The Grand Jury charges:

## <u>COUNT 1</u> (Sex Trafficking by Force, Fraud, or Coercion)

Beginning on or about July 28, 2015 and continuing through on or about August 31, 2015, in the Eastern District of Louisiana and elsewhere, the defendant, **DAVID MICHAEL WHITE, Jr.**, a/k/a "Prince Loyalty," in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, maintain, patronize and solicit, by any means a person, A.D., and did benefit financially from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, maintained, patronized and solicited by any means a person, A.D., knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination thereof, would be used to cause A.D.

to engage in a commercial sex act, all in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), and (b)(1).

## <u>COUNT 2</u> (Use of Interstate Facility to Promote Prostitution)

From on or about July 1, 2015, continuing up to and including on or about September 30, 2015, in the Eastern District of Louisiana and elsewhere, the defendant **DAVID MICHAEL WHITE, Jr.**, a/k/a "Prince Loyalty," used and caused to be used a facility in interstate commerce, to wit: the Internet, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, prostitution offenses in violation of the laws of the State of Louisiana, LA Rev. Stat. 14:83.2 and LA Rev. Stat 14:84, and thereafter performed and attempted to perform an act, to wit: posting advertisements for commercial sex acts on the website "Backpage.com" to promote, manage establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, all in violation of Title 18, United States Code, Section 1952(a)(3).

#### **<u>COUNT 3</u>** (Use of Interstate Facility to Promote Prostitution)

From on or about January 1, 2013, continuing up to and including on or about February 1, 2013, in the Eastern District of Louisiana and elsewhere, the defendant **DAVID MICHAEL WHITE, Jr.**, a/k/a "Prince Loyalty," used and caused to be used a facility in interstate commerce, to wit: the Internet, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, prostitution offenses in violation of the laws of the State of Louisiana, LA Rev. Stat. 14:83.2 and LA Rev. Stat 14:84, and thereafter performed and attempted to perform an act, to wit:

posting advertisements for commercial sex acts on the website "Backpage.com" to promote, manage establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity, all in violation of Title 18, United States Code, Section 1952(a)(3).

#### **NOTICE OF SEX TRAFFICKING FORFEITURE**

1. The allegations of Count 1 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 1594(d).

2. As a result of the offense alleged in Count 1, defendant **DAVID MICHAEL WHITE, Jr.**, a/k/a "Prince Loyalty," shall forfeit to the United States pursuant to Title 18, United States Code, Section 1594(d), any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Count 1 of this Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, 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 person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 1594(d).

## NOTICE OF FORFEITURE FOR USE OF AN INTERSTATE FACILITY TO PROMOTE PROSTITUTION

1. The allegations of Counts 2 and 3 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1952 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 2 and 3, defendant **DAVID MICHAEL WHITE, Jr.**, a/k/a "Prince Loyalty," shall forfeit to the United States pursuant to Title 18, United States Code, Sections 1952 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1952.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, 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 person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 1952 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

KENNETH ALLEN POLITE, JR. UNITED STATES ATTORNEY

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JULIA K. EVANS Assistant United States Attorney

New Orleans, Louisiana May 6, 2016