

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO. 20-19
	*	
v.	*	SECTION: M
	*	
RANDY JONAL SCHENCK	*	
(a/k/a "RuRu")	*	
(a/k/a "Shaq")	*	

* * *

FACTUAL BASIS

The defendant, **RANDY JONAL SCHENCK** (hereinafter, the "defendant" or "**SCHENCK**"), has agreed to plead guilty to Counts 1 and 7 of the Indictment currently pending against him, charging **SCHENCK** with interstate transportation in aid of racketeering enterprises, in violation of Title 18, United States Code, Section 1952(a)(3) (Count 1), and wire fraud, in violation of Title 18, United States Code, Sections 1343 and 2 (Count 7). Should this matter proceed to trial, both the Government and the defendant, **RANDY JONAL SCHENCK**, 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 Indictment now pending against the defendant:

AUSA JG
Defendant RL
Defense Counsel BN

Introduction

The Government would show that **RANDY JONAL SCHENCK** (“**SCHENCK**”), was an adult male who was born in April 1981. **SCHENCK** lived for extended periods of time in both California and the New Orleans, Louisiana area.

The Government would further show that Dominique Alaina Berry (“Berry”) was a United States citizen, who resided in Tangipahoa Parish, Louisiana, within the Eastern District of Louisiana. Berry was born in July 1989. Berry used numerous aliases, including “Desiree Knowles,” “Jasmine Collins,” and “Stephanie,” among others.

The Government would further show that S.A. was an adult male who, at all times mentioned in the Indictment, resided in Metairie, Louisiana, within the Eastern District of Louisiana.

The Government would further establish that the laws of the states of California, Louisiana, New Mexico, Texas, Arizona, Tennessee, and Georgia made prostitution a criminally punishable unlawful activity.

Operating Prostitution Enterprise

The Government would further show that in about early 2013, **SCHENCK** met Berry in the New Orleans, Louisiana area. **SCHENCK** and Berry entered into a romantic relationship. Shortly thereafter, **SCHENCK** encouraged Berry to engage in commercial sex activities (*i.e.*, prostitution) with individuals in the New Orleans, Louisiana area. **SCHENCK** became involved in the scheduling, coordination, and facilitation of Berry’s commercial sex acts. **SCHENCK** also determined the rates to be charged for commercial sex acts involving Berry and provided Berry

with instructions related to the commission of commercial sex acts. Additionally, **SCHENCK** typically drove Berry to “out call” commercial sex dates, often posing as Berry’s ride-sharing driver. **SCHENCK** typically kept all, or most, of the proceeds of the commercial sex acts.

The Government would further establish that, beginning not later than about March 2014, and continuing through September 2017, **SCHENCK** and Berry traveled across the country, including to California, Louisiana, New Mexico, Texas, Arizona, Tennessee, and Georgia, for the purpose of Berry engaging in commercial sex acts. The prostitution activity constituted a recurring business enterprise designed and intended to make a profit. **SCHENCK** used facilities of interstate commerce, including vehicles, public highways, hotels, cellular telephones, and the internet to promote, manage, and facilitate commercial sex acts involving Berry. Among the vehicles **SCHENCK** used was a white Mercedes Benz sport utility vehicle bearing Arizona license plate [REDACTED]. In furtherance of the enterprise, Berry regularly engaged in commercial sex acts on multiple days of nearly every week between about March 2014 and September 2017.

The Government would further establish that between about 2014 and 2017, **SCHENCK** and Berry posted dozens of advertisements, including on or about September 2, 2015, November 26, 2015, March 29, 2016, October 1, 2016, and October 21, 2016, containing photographs of Berry on location-specific online classified ad service websites and social media applications in, among other places, California, Louisiana, New Mexico, Texas, Arizona, Tennessee, and Georgia. The advertisements invited interested individuals to contact Berry to schedule sexual interactions, many of which were explicitly commercial. Among the advertisements for prostitution services **SCHENCK** participated in creating was one posted on or about September 2, 2015 in the Tucson,

Arizona area entitled, "Let me replace that stress with soft sensual finesse - 25," bearing [REDACTED] [REDACTED]. The advertisement contained sexually suggestive pictures of Berry and stated, "Hello gentlemen, I'm Jasmine. Long hard day at work? Tired of this heat? I would love to have the joy to take all that away and bring you to a world of exotic and sensual fantasy. You deserve to relax and let these magical hands take full effect, and caress you to your every desire. OUTCALLS TO ALL MAJOR HOTELS, CASINOS, AND RESORTS IN THE TUCSON AREA. [REDACTED]" As a result of the above-described advertisement, Berry engaged in commercial sex acts in the Tucson, Arizona area.

Wire Fraud


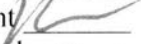

The Government would further establish that the prostitution enterprise described above evolved to include a scheme to defraud whereby Berry, acting at **SCHENCK's** direction, travelled to "out call" interactions at the residences of men who met Berry through online postings. **SCHENCK** typically drove Berry to the interactions. While at the residences, Berry placed substances in the beverages of the men for the purpose of "spiking" their drinks and rendering them unconscious. Berry then took items of value from the incapacitated men, including jewelry, firearms, electronics, cash, and debit and credit cards. **SCHENCK** and Berry used the items, without the knowledge or authorization of the people to whom the items belonged, for their benefit and the benefit of individuals associated with them. Between about 2015 and September 2017, **SCHENCK** and Berry engaged in this scheme to defraud on numerous occasions at locations across the United States, including in California, Arizona, Texas, Georgia, and Louisiana.

The Government would further establish that, in furtherance of the above-described scheme, on or about February 24, 2017, Berry met S.A. via a social networking cellular phone application, "Meet Me." Berry and S.A. discussed and arranged for Berry to travel to S.A.'s apartment, located in Metairie, Louisiana, to visit with S.A. At approximately 9:30 pm on February 24, 2017, **SCHENCK** drove Berry to S.A.'s apartment and dropped her off. Acting at **SCHENCK's** direction, while at S.A.'s apartment, Berry provided S.A. various substances, mixed within alcohol without his knowledge, to loosen S.A.'s inhibitions and to render him more susceptible to theft. After S.A. became incapacitated, Berry stole S.A.'s personal property, including a debit card in his name. S.A.'s debit card, which bore account number [REDACTED], drew on the funds contained in S.A.'s JPMorgan Chase Bank, N.A. ("Chase Bank") account bearing account number [REDACTED]. At approximately 1:00 am on February 25, 2017, **SCHENCK** picked up Berry from S.A.'s apartment.

The Government would further establish that, on or about February 25, 2017, at approximately 4:15 pm, **SCHENCK** used and caused to be used S.A.'s debit card at a Walmart Supercenter located at 1901 Tchoupitoulas Street, New Orleans, Louisiana 70130, to make a purchase in the amount of \$81.04. S.A. did not authorize **SCHENCK** to make the purchase; **SCHENCK** was aware that he lacked S.A.'s authorization to use S.A.'s debit card. Consequently, **SCHENCK's** use of S.A.'s debit card constituted a fraudulent transaction whose design and purpose was to obtain money and property. **SCHENCK's** use of S.A.'s debit card caused the transmission of a wire communication to travel in interstate commerce, that is, from the State of Louisiana to a location outside of the State of Louisiana.



The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from Special Agents from the Federal Bureau of Investigation, representatives from the Jefferson Parish (Louisiana) Sheriff's Office, the Tucson (Arizona) Police Department, the Salt River (Arizona) Police Department, the Cobb County (Georgia) Police Department, the Sandy Springs (Georgia) Police Department, the Sacramento (California) Police Department, as well as other witnesses and documents in the possession of the FBI.

AUSA 
Defendant 
Defense Counsel 

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **RANDY JONAL SCHENCK** and the Government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for his guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the plea of guilty to the charged offenses by **RANDY JONAL SCHENCK**.

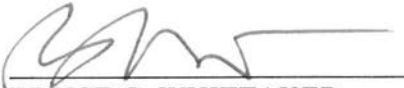
APPROVED AND ACCEPTED:



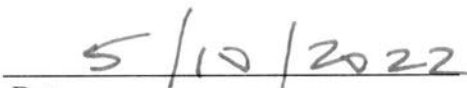
RANDY JONAL SCHENCK
Defendant



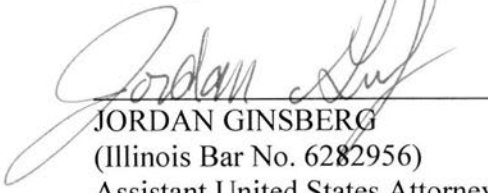
Date



BRUCE G. WHITTAKER
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Date



JORDAN GINSBERG
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Assistant United States Attorney



Date



MELISSA BÜCHER
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Assistant United States Attorney



Date