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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 STEPHEN SHIPPS,

Defendant.

Case:2:20-cr-20517
Judge: Hood, Denise Page
MJ: Grand, David R.
Filed: 10-28-2020 At 01:11 PM
INDI USA V. SEALED MATTER (DA)

VIO: 18 U.S.C. § 2423(a)

INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this Indictment, a girl, Minor Victim One (MV-1), whose identity is known to the Grand Jury, was the victim of the crime alleged herein. MV-1 was a resident of the Eastern District of Michigan and was born in December 1985.

COUNT ONE

Transportation of a Minor to Engage in Sexual Activity
18 U.S.C. § 2423(a)

In or around February and March 2002, in the Eastern District of Michigan and elsewhere, the defendant, STEPHEN SHIPPS, did knowingly transport an individual who had not attained the age of 18 years (to wit: MV-1) in interstate and

foreign commerce, with the intent that such individual engage in sexual activity for which any person can be charged with a criminal offense; all in violation of Title 18, United States Code, Section 2423(a).

COUNT TWO

Transportation of a Minor to Engage in Sexual Activity
18 U.S.C. § 2423(a)

In or around June and July 2002, in the Eastern District of Michigan and elsewhere, the defendant, STEPHEN SHIPPS, did knowingly transport an individual who had not attained the age of 18 years (to wit: MV-1) in interstate and foreign commerce, with the intent that such individual engage in sexual activity for which any person can be charged with a criminal offense; all in violation of Title 18, United States Code, Section 2423(a).

FORFEITURE ALLEGATIONS

18 U.S.C. § 2428

As a result of the violation of 18 U.S.C. § 2423(a) set forth in Count One of this Indictment, upon conviction the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 2428: (1) any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and (2) any property, real or personal, constituting or derived from, any proceeds that he obtained, directly or indirectly, as a result of such violation.

Forfeiture Money Judgment: Such property also includes, but is not limited to, a forfeiture money judgment against the defendant in an amount to be determined, representing the total value of all property subject to forfeiture, as described herein.

Substitute Assets: Pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461, the defendant shall forfeit substitute property, up to the value of the properties described above, if, by any act or omission of the defendant, the property described above cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the court; have been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
Grand Jury Foreperson

MATTHEW SCHNEIDER
UNITED STATES ATTORNEY

MATTHEW A. ROTH
Chief, Major Crimes Unit
Assistant United States Attorney

s/Sara D. Woodward
SARA D. WOODWARD
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Dated: October 28, 2020

Case:2:20-cr-20517
 Judge: Hood, Denise Page
 MJ: Grand, David R.
 Filed: 10-28-2020 At 01:11 PM
 INDI USA V. SEALED MATTER (DA)

United States District Court
 Eastern District of Michigan

Criminal Case Cover

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: SDW

Case Title: USA v. D-1 Stephen Shipps

County where offense occurred : Washtenaw and Elsewhere

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

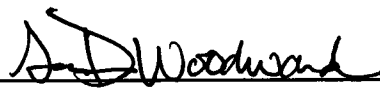
Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 28, 2020
 Date


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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.