

LEH:EMR/ALK/JD
F. #2023R00402

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

INDICTMENT

- against -

OMARI SCOTT,
also known as "Prince" and "Sir
Prince," and
MICHAEL SIMMONS,
also known as "Victory,"

Defendants.

Cr. No. 24-CR-158
(T. 18, U.S.C., §§ 922(g)(1), 924(a)(2),
924(d)(1), 981(a)(1)(C), 1591(a)(1),
1591(a)(2), 1591(b)(1), 1594(d),
1952(a)(3)(A), 2245, 2253(a), 2253(b),
2422(a), 2428(a), 2 and 3551 et seq.; T.
21, U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c))

**Judge Kiyo A. Matsumoto
Magistrate Judge Robert M. Levy**

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THE GRAND JURY CHARGES:

COUNT ONE
(Promotion of Prostitution)

1. In or about and between January 2021 and May 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant OMARI SCOTT, also known as "Prince" and "Sir Prince," together with others, did knowingly and intentionally use one or more facilities in interstate commerce, to wit: one or more cellphones, with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of unlawful activity, to wit: a business enterprise involving prostitution, in violation of the laws of the States in which they were committed and of the United States, and did thereafter perform and attempt to perform the promotion,

management, establishment, carrying on and facilitation of the promotion, management, establishment and carrying on of such unlawful activity.

(Title 18, United States Code, Sections 1952(a)(3)(A), 2 and 3551 et seq.)

COUNT TWO

(Sex Trafficking – Jane Doe #1)

2. In or about and between May 2022 and February 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant OMARI SCOTT, also known as “Prince” and “Sir Prince,” together with others, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe #1, an individual whose identity is known to the Grand Jury, in and affecting interstate commerce, and did benefit, financially and by receiving things of value, from participation in a venture which engaged in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means, would be used to cause Jane Doe #1 to engage in one or more commercial sex acts, which offense was effected by means of force, threats of force, fraud and coercion, and a combination of such means.

(Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), 1591(b)(1), 2 and 3551 et seq.)

COUNT THREE

(Sex Trafficking – Jane Doe #2)

3. In or about and between August 2022 and June 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants OMARI SCOTT, also known as “Prince” and “Sir Prince,” and MICHAEL SIMMONS, also known as “Victory,” together with others, did knowingly and intentionally

recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe #2, an individual whose identity is known to the Grand Jury, in and affecting interstate commerce, and did benefit, financially and by receiving things of value, from participation in a venture which engaged in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means, would be used to cause Jane Doe #2 to engage in one or more commercial sex acts, which offense was effected by means of force, threats of force, fraud and coercion, and a combination of such means.

(Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), 1591(b)(1), 2 and 3551 et seq.)

COUNT FOUR

(Murder of Cleveland Clay in the Course of Sex Trafficking)

4. On or about May 1, 2023, within the Eastern District of New York and elsewhere, the defendants OMARI SCOTT, also known as “Prince” and “Sir Prince,” and MICHAEL SIMMONS, also known as “Victory,” together with others, in the course of a violation of Title 18, United States Code, Section 1591, to wit: the crime charged in Count Three, did knowingly and intentionally murder an individual, in that the defendants, together with others, with malice aforethought, did unlawfully kill Cleveland Clay.

(Title 18, United States Code, Sections 2245, 2 and 3551 et seq.)

COUNT FIVE

(Promotion of Prostitution)

5. In or about and between November 2022 and June 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MICHAEL SIMMONS, also known as “Victory,” together with others, did knowingly and intentionally use one or more facilities in interstate commerce, to wit: one or more cellphones,

with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of unlawful activity, to wit: a business enterprise involving prostitution, in violation of the laws of the States in which they were committed and of the United States, and did thereafter perform and attempt to perform the promotion, management, establishment, carrying on and facilitation of the promotion, management, establishment and carrying on of such unlawful activity.

(Title 18, United States Code, Sections 1952(a)(3)(A), 2 and 3551 et seq.)

COUNT SIX
(Interstate Prostitution)

6. In or about and between May 2023 and June 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant MICHAEL SIMMONS, also known as “Victory,” did knowingly and intentionally persuade, induce, entice and coerce one or more individuals to travel in interstate commerce to engage in prostitution.

(Title 18, United States Code, Sections 2422(a) and 3551 et seq.)

COUNT SEVEN
(Felon in Possession of Ammunition)

7. On or about May 1, 2023, within the Eastern District of New York, the defendant MICHAEL SIMMONS, also known as “Victory,” knowing that he had previously been convicted in a court of one or more crimes punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce ammunition, to wit: .380 caliber Winchester ammunition.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 3551 et seq.)

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE AND FIVE**

8. The United States hereby gives notice to the defendants charged in Counts One and Five that, upon their conviction of any of such offenses, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses; and (b) Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any violation of any criminal law of the United States.

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (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 divided

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 the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS TWO AND THREE**

10. The United States hereby gives notice to the defendants charged in Counts Two and Three that, upon their conviction of any of such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 1594(d), of: (a) any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offenses, and any property traceable to such property; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses, or any property traceable to such property.

11. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (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 divided

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 the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 1594(d); Title 21, United States Code, Section 853(p))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT FOUR

12. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count Four, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253(a), which requires the forfeiture of: (a) any visual depiction described in Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Title 18 of the United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting, or traceable to, gross profits or other proceeds obtained from such offense; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

13. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (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 divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any other

property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 2253(a) and 2253(b); Title 21, United States Code, Section 853(p))

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT SIX**

14. The United States hereby gives notice to the defendant charged in Count Six that, upon his conviction of such offense, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2428(a), which requires the forfeiture of: (a) any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offense; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

15. If any of the above-described forfeitable property, 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 party;
- (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 divided

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 the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2428(a); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOR PERSON

By Carolyn Pokorny, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

OMARI SCOTT, also known as "Prince" and "Sir Prince," and
MICHAEL SIMMONS, also known as "Victory,"

Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 922(g)(1), 924(a)(2), 924(d)(1), 981(a)(1)(C),
1591(a)(1), 1591(a)(2), 1591(b)(1), 1594(d), 1952(a)(3)(A), 2245,
2253(a), 2253(b), 2422(a), 2428(a), 2 and 3551 et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

A true bill.



person

Filed in open court this _____ day.

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Erin Reid, Anna L. Karamigios and Joshua Dugan
Assistant U.S. Attorneys (718) 254-7000