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BROOKLYN OFFICE

NS:PAS  
F. #2019R01222

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

GLADIMIR THOMAS,  
also known as "Sleep,"  
"Sleep Boss" and  
"Daddy," and  
RONALD THOMAS,  
also known as "Roco,"  
"Roco Da Boss" and  
"Daddy,"

Defendants.

INDICTMENT

Cr. No. **CR 20 0001**  
(T. 18, U.S.C., §§ 981(a)(1)(C),  
1591(a)(1), 1591(a)(2), 1591(b)(1),  
1594(c), 1594(d), 1594(e),  
1952(a)(3)(A), 2 and 3551 et seq.;  
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,  
§ 2461(c))

**MAUSKOPF, J**

**POLLAK, M.J.**

----- X  
THE GRAND JURY CHARGES:

COUNT ONE  
(Sex Trafficking Conspiracy)

1. In or about and between 2014 and 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants GLADIMIR THOMAS, also known as "Sleep," "Sleep Boss" and "Daddy," and RONALD THOMAS, also known as "Roco," "Roco Da Boss" and "Daddy," together with others, did knowingly and intentionally conspire to recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe, an individual whose identity is known to the Grand Jury, in and affecting interstate commerce, and to 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 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, contrary to Title 18, United States Code, Sections 1591(a)(1) and 1591(a)(2).

(Title 18, United States Code, Sections 1594(c), 1591(a)(1), 1591(a)(2), 1591(b)(1) and 3551 et seq.)

COUNT TWO  
(Sex Trafficking)

2. In or about and between 2014 and 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants GLADIMIR THOMAS, also known as “Sleep,” “Sleep Boss” and “Daddy,” and RONALD THOMAS, also known as “Roco,” “Roco Da Boss” and “Daddy,” together with others, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, to wit: Jane Doe, 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 to engage in one or more

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.

5. 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 1594(d) and 1594(e); Title 21, United States Code, Section 853(p))

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT THREE

6. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count Three, the government will seek forfeiture in accordance with 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 offense to forfeit

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  
(Promotion of Prostitution)

3. In or about and between 2014 and 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants GLADIMIR THOMAS, also known as "Sleep," "Sleep Boss" and "Daddy," and RONALD THOMAS, also known as "Roco," "Roco Da Boss" and "Daddy," together with others, did knowingly and intentionally use one or more facilities in interstate commerce, to wit: the Internet, 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.)

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNTS ONE AND TWO

4. The United States hereby gives notice to the defendants that, upon their conviction of either of the offenses charged in Counts One and Two, the government will seek forfeiture in accordance with Title 18, United States Code, Sections 1594(d) and (e), of (a) any property, real or personal, that was involved in, used or intended to be used to

any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

7. 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 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

  
RICHARD P. DONOGHUE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK



No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

*EASTERN District of NEW YORK*

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

*GLADIMIR THOMAS, also known as "Sleep," et. al.,*

Defendants.

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**INDICTMENT**

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

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*A true bill.*

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*Filed in open court this* ----- *d*

*of* ----- *A.D. 20* -----

\_\_\_\_\_  
*Clerk*

*Bail, \$* -----

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*Phil Selden, Assistant U.S. Attorney (718) 254-6257*