

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

**FILED**  
6-24-2015  
CLERK, U. S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE, FLORIDA

UNITED STATES OF AMERICA

v.

ESTHELA CLARK

CASE NO. 3:15-cr-93-J-32MCR  
Ct. 1: 8 U.S.C. § 1324(a)(1)(A)(iv) and  
1324(a)(1)(B)(i)  
Ct. 2: 8 U.S.C. § 1324(a)(1)(A)(i) and  
1324(a)(1)(B)(i) and 18 U.S.C. § 2  
Ct. 3: 8 U.S.C. § 1324(a)(1)(A)(iii) and  
1324(a)(1)(B)(i)  
Ct. 4: 18 U.S.C. § 1590(a)  
Ct. 5: 18 U.S.C. § 1581(a)  
Ct. 6: 18 U.S.C. § 1584(a)  
Ct. 7: 18 U.S.C. § 1589(a)  
Ct. 8: 18 U.S.C. § 1591  
Ct. 9: 18 U.S.C. § 1592(a)  
Forfeitures: 18 U.S.C. § 982(a)(6) and/or  
8 U.S.C. § 1324(b) and  
18 U.S.C. § 2461(c)  
18 U.S.C. §§ 1594(a)(1) and (a)(2)

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

**COUNT ONE (ENCOURAGING OR INDUCING  
AN ALIEN TO ENTER THE UNITED STATES UNLAWFULLY)**

Between a presently unknown date, but not later than on or about November 27,  
2012, and on or about December 2, 2012, in Duval County, in the Middle District of  
Florida, Texas, Mexico, and elsewhere,

ESTHELA CLARK,

the defendant herein, did encourage and induce an alien, namely, a female whose initials are Y.L., to come to, enter and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States was in violation of law, for purpose of private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv) and 1324(a)(1)(B)(i).

**COUNT TWO (BRINGING AN ALIEN TO THE  
UNITED STATES UNLAWFULLY)**

Between on or about November 27, 2012, and on or about December 2, 2012, in Duval County, in the Middle District of Florida, Mexico, Texas, and elsewhere,

ESTHELA CLARK,

the defendant herein, did knowingly bring, cause to be brought, and aided and abetted in bringing to the United States an alien, namely a female whose initials are Y.L., knowing that said person was an alien, at a place other than as designated by the Secretary of Homeland Security.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(i) and 1324(a)(1)(B)(i) and Title 18, United States Code, Section 2.

**COUNT THREE (ALIEN HARBORING)**

Between a presently unknown date, but not later than on or about December 2, 2012, and on or about January 12, 2015, in Duval County, in the Middle District of Florida, Missouri, and elsewhere,

**ESTHELA CLARK,**

the defendant herein, knowing and in reckless disregard of the fact that an alien, namely, a female whose initials are Y.L., had come to, entered and remained in the United States in violation of law, did conceal, harbor, and shield from detection such alien in buildings and other places for the purpose of private financial gain

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i).

**COUNT FOUR (LABOR TRAFFICKING)**

Between on or about November 27, 2012, and on or about January 12, 2015, in Duval County, in the Middle District of Florida, Mexico, Texas, Missouri, and elsewhere,

**ESTHELA CLARK,**

the defendant herein, did knowingly recruit, harbor, transport, provide, and obtain by any means a person, that is, a female whose initials are Y.L., for labor or services in violation of Title 18, United States Code, Sections 1581(a), 1584(a), and 1589(a).

In violation of Title 18, United States Code, Section 1590(a).

**COUNT FIVE (PEONAGE)**

Between on or about November 27, 2012, and on or about January 12, 2015, at Duval County, in the Middle District of Florida, Missouri, and elsewhere,

**ESTHELA CLARK,**

the defendant herein, held a person, that is a female whose initials are Y.L., to a condition of peonage.

In violation of Title 18, United States Code, Section 1581(a).

**COUNT SIX (INVOLUNTARY SERVITUDE)**

Between on or about November 27, 2012, and on or about January 12, 2015, in Duval County, the Middle District of Florida, Missouri, and elsewhere,

**ESTHELA CLARK,**

the defendant herein, knowingly and willfully held a person, that is a female whose initials are Y.L., to involuntary servitude for a term.

In violation of Title 18, United States Code, Section 1584(a).

**COUNT SEVEN (FORCED LABOR)**

Between on or about November 27, 2012, and on or about January 12, 2015, at Duval County, in the Middle District of Florida, Missouri, and elsewhere,

**ESTHELA CLARK,**

the defendant herein, did knowingly provide and obtain the labor and services of a female whose initials are Y.L. by means of force, threats of force, physical restraint, and threats of physical restraint to Y.L.; serious harm and threats of serious harm to Y.L.; the abuse and threatened abuse of law and legal process; and by means of a scheme, plan, and

pattern intended to cause Y.L. to believe that, if Y.L. did not perform such labor and services, Y.L. would suffer serious harm or physical restraint.

In violation of Title 18, United States Code, Section 1589(a).

**COUNT EIGHT (COMMERCIAL SEX TRAFFICKING)**

Between on or about June 17, 2013 through on or about September 17, 2013, at Jacksonville, in the Middle District of Florida, Missouri, and elsewhere,

ESTHELA CLARK,

the defendant herein, in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, that is a female whose initials are Y.L., while knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion would be used to cause that person to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591.

**COUNT NINE (UNLAWFUL CONDUCT WITH RESPECT TO DOCUMENTS)**

Between on or about November 27, 2012, and on or about January 12, 2015, at Duval County, in the Middle District of Florida, Missouri, and elsewhere,

ESTHELA CLARK,

the defendant herein, did knowingly destroy, conceal, remove, confiscate, and possess any actual and purported government identification document of another person, that is a

female whose initials are Y.L., in the course of the violations alleged in Counts Four, Five, Six, Seven, Eight, and Nine, above; and with intent to commit any of the violations alleged in Counts Four, Five, Six, Seven, Eight, and Nine, above; and to prevent and restrict and to attempt to prevent and restrict, without lawful authority, Y.L.'s ability to move and travel, in order to maintain the labor and services of Y.L.

In violation of Title 18, United States Code, Section 1592(a).

### **FORFEITURE**

1. The allegations contained in Counts One through Nine of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(6) and/or Title 8, United States Code, Section 1324(b) and Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 1594.

2. Upon conviction of a violation of Title 8, United States Code, Section 1324, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(6), any conveyance, including any vessel, vehicle, or aircraft, used in the commission of the offense, any property, real or personal, that constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of conviction, and any property, real or personal, used to facilitate or intended to be used to facilitate, the commission of the offense of conviction.

3. Upon conviction of a violation of Title 8, United States Code, Section 1324(a), the defendant shall forfeit to the United States of America, pursuant to Title 8, United States Code, Section 1324(b), any conveyance, including any vessel, vehicle, or aircraft, that has been or is being used in the commission of the offense of conviction, the gross proceeds of such violation, and any property traceable to such conveyance or proceeds.

4. Upon conviction of a violation of Title 18, United States Code, Section 1581, 1584, 1589, 1590, 1591 and/or 1592, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 1594, any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense; and any property, real or personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offense.

5. The property to be forfeited includes, but is not limited to, the following:

- a. a 2003 aluminum/silver Chevrolet Avalanche truck, Florida Tag No. H721PV, VIN 3GNEC13T73G317421; and
- b. a 2004 black Ford Mustang, 2 door, Florida Tag No. W167TL, VIN 1FAFP42X34F195320.

6. If any of the property described above, 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,

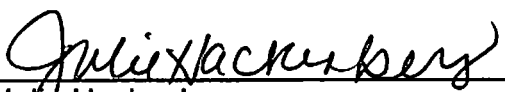
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL,

Susanna Vance  
Foreperson

A. LEE BENTLEY, III  
United States Attorney

By:   
\_\_\_\_\_  
Mac D. Heavener, III  
Assistant United States Attorney

By:   
\_\_\_\_\_  
Julie Hackenberry  
Assistant United States Attorney  
Chief, Jacksonville Division

---

---

**UNITED STATES DISTRICT COURT**

Middle District of Florida  
Jacksonville Division

---

---

**THE UNITED STATES OF AMERICA**  
**vs.**  
**ESTHELA CLARK**

---

---

**INDICTMENT**

Violations:

- Ct. 1: 8 U.S.C. § 1324(a)(1)(A)(iv) and 1324(a)(1)(B)(i)
  - Ct. 2: 8 U.S.C. § 1324(a)(1)(A)(i) and 1324(a)(1)(B)(i) and 18 U.S.C. § 2
  - Ct. 3: 8 U.S.C. § 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i)
  - Ct. 4: 18 U.S.C. § 1590(a)
  - Ct. 5: 18 U.S.C. § 1581(a)
  - Ct. 6: 18 U.S.C. § 1584(a)
  - Ct. 7: 18 U.S.C. § 1589(a)
  - Ct. 8: 18 U.S.C. § 1591
  - Ct. 9: 18 U.S.C. § 1592(a)
- 
- 

A true bill,

*Susanna Vance*

Foreperson

---

---

Filed in open court this 24 day

of June, 2015.

*Meghan D. Chaddock*  
Deputy Clerk

---

---

Bail \$ \_\_\_\_\_

---

---