

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF FLORIDA  
GAINESVILLE DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**RAJHEEM KWAMAINE RODDEY**  
**a/k/a "Cash"**  
**and**  
**LANEY ELLIS**

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**SUPERSEDING  
INDICTMENT  
1:17-cr-19-MW-GRJ**

**THE GRAND JURY CHARGES:**

**COUNT ONE**


Between on or about April 25, 2017, and on or about June 12, 2017, in the Northern District of Florida and elsewhere, the defendants,

**RAJHEEM KWAMAINE RODDEY,**  
**a/k/a "Cash,"**  
**and**  
**LANEY ELLIS,**

knowingly and willfully did combine, conspire, confederate, and agree together and with other persons, to commit offenses against the United States, namely:

1. in and affecting interstate commerce, to recruit, entice, harbor, transport, provide, obtain, and maintain, by any means a person, that is, M.H., having a reasonable opportunity to observe M.H., and knowing, and in reckless disregard of the fact, that M.H. had not attained the age of 18 years and

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would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a)(1); and

2. to benefit financially by receiving anything of value from participation in a venture which has engaged in an act in violation of Title 18, United States Code, Section 1591(a)(1), as described in paragraph 1 above, in violation of Title 18, United States Code, Section 1591(a)(2).

All in violation of Title 18, United States Code, Section 1594(c).

## **COUNT TWO**

Between on or about April 25, 2017, and on or about June 12, 2017, in the Northern District of Florida and elsewhere, the defendants,

**RAJHEEM KWAMAINE RODDEY,**  
**a/k/a "Cash,"**  
**and**  
**LANEY ELLIS,**

did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain, by any means a person, that is, M.H., having a reasonable opportunity to observe, and knowing, and in reckless disregard of the fact, that M.H. had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(2), and 2.

**COUNT THREE**

Between on or about April 25, 2017, and on or about June 12, 2017, in the Northern District of Florida and elsewhere, the defendants,

**RAJHEEM KWAMAINE RODDEY,**  
**a/k/a "Cash,"**  
**and**  
**LANEY ELLIS,**

did knowingly benefit, financially and by receiving anything of value, from participation in a venture which had engaged in an act described in violation of paragraph (1) of Title 18, United States Code, Section 1591(a), as set forth in Count Two of this Indictment.

In violation of Title 18, United States Code, Sections 1591(a)(2), 1591(b)(2), and 2.

**CRIMINAL FORFEITURE**

The allegations contained in Counts One, Two, and Three of this Indictment are hereby realleged and incorporated by reference as part of this forfeiture count.

Because the defendants,

**RAJHEEM KWAMAINE RODDEY,**  
**a/k/a "Cash,"**  
**and**  
**LANEY ELLIS,**

did knowingly commit an offense in violation of Section 1591 of Chapter 77, any and all interest that these defendants have in any property, real and personal, used

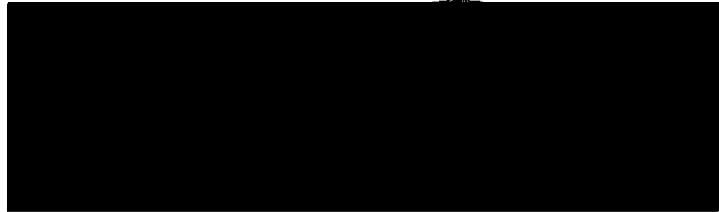
and intended to be used to commit and facilitate the commission of said offenses, or constituting or derived from any proceeds obtained directly or indirectly as a result of such violations, is vested in the United States and hereby forfeited to the United States, pursuant to Title 18, United States Code, Sections 1594(d) and 1594(e).

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third party;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that 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 1594 (e)(2), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.


A TRUE BILL:



11-28-17

DATE

  
CHRISTOPHER P. CANOVA  
United States Attorney

  
F.T. WILLIAMS  
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