

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

UNITED STATES OF AMERICA

CASE NO. 1:17CR19-MW/GRJ

v.

LANEY ELLIS

STATEMENT OF FACTS

THE UNITED STATES OF AMERICA, by and through the undersigned Assistant United States Attorney, provides this factual basis for the acceptance of the guilty plea of Laney Ellis. Should this case proceed to trial, the government is prepared to present evidence as follows:

Between April 25, 2017, and June 12, 2017, Laney Ellis and others were involved in a scheme to make money using a 14 year old minor female, M.H., to perform sex acts. Photographs of M.H. were taken and used to create an advertisement on Backpage.com, an Internet advertising website. The advertisements were posted in a section for "escort services," when in truth, the advertisements were for the purpose of offering M.H. for commercial sexual activity. Individuals, referred to as "clients" or "johns," responded to the advertisements by texting or calling a cell phone number included in the advertisements. In some

instances, Ellis used her phone to post advertisements. Ellis also responded to texts and calls received by “johns,” and coordinated details such as the price and location where M.H. would engage in commercial sexual activity. After receiving responses, M.H. was transported to various locations in the Northern District of Florida, including private residences and motels, for the purpose of engaging in sexual activity with the “clients.” In some instances, Ellis accompanied M.H. when she was transported to these locations. M.H. was paid for this sexual activity, and Ellis and others profited from M.H.’s commercial sexual activity through cash and drugs purchased with the proceeds. Throughout this period Ellis was aware that M.H. was a minor and had not attained the age of 18 years.

Elements of the Offense

The elements of the offense for which the defendant is entering her guilty plea are as follows:

- First: That the defendant knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, or maintained by any means another person, identified by the initials M.H.;
- Second: That the Defendant did so knowing or, except where the act constituting the violation is advertising, 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;


Third: That the Defendant's acts were in or affected interstate or foreign commerce.

CHRISTOPHER P. CANOVA
United States Attorney



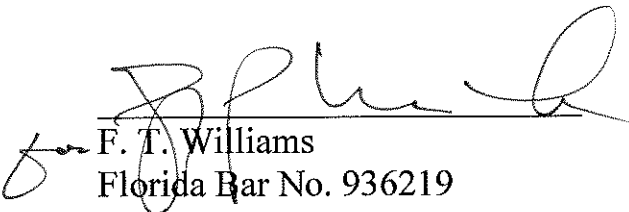
Nick Zissimopoulos
Attorney for Defendant

2/20/2018
Date



Laney Ellis
Defendant

2/20/2018
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February 20, 2018
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