

FILED
At Albuquerque NM

APR 10 2018

MATTHEW J. DYKMAN
CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	CRIMINAL NO. 17-03246 MV
Plaintiff,)	
)	Count 1: 18 U.S.C. §§ 1594(a) and (c):
vs.)	Attempt and Conspiracy to Commit Sex
)	Trafficking of Minors;
)	
CHANTE BICKHAM,)	Count 2: 18 U.S.C. §§ 2423(a) and (e):
CAMARA CHERRY-AMOS,)	Attempt and Conspiracy to Transport
JOHN DOMPIERRE,)	Minors to Engage in Criminal Sexual
BREEAUNA LANGTON,)	Activity; and
KERON EUGENE LUCIOUS,)	
JASON L. JACKSON,)	Counts 3-11: 18 U.S.C. §§ 1591(a) and
DEVIN PERKINS, and)	(b)(2): Sex Trafficking of Minors; 18
ANDREW WYATT,)	U.S.C. § 2: Aiding and Abetting.
)	
Defendants.)	

FIRST SUPERSEDING INDICTMENT

Count 1

Beginning in or about February 2017, and continuing until in or about January 2018, in Bernalillo County, in the District of New Mexico and elsewhere, the defendants, **CHANTE BICKHAM, CAMARA CHERRY-AMOS, JOHN DOMPIERRE, BREEAUNA LANGTON, KERON EUGENE LUCIOUS, JASON L. JACKSON, DEVIN PERKINS,** and **ANDREW WYATT**, attempted to and conspired with one or more other persons to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means and benefit financially and receive anything of value from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained in and affecting interstate or foreign commerce minor victims knowing and in reckless disregard of the fact that force, threats

of force, fraud, and coercion would be used to cause minor victims to engage in commercial sex acts and knowing and in reckless disregard of the fact that the minor victims had not attained the age of 18 years in violation of 18 U.S.C. §§ 1591(a) and (b)(2).

In violation of 18 U.S.C. §§ 1594(a) and (c).

Count 2

Beginning in or about November 2017, and continuing until in or about January 2018, in Bernalillo County, in the District of New Mexico and elsewhere, the defendants, **CHANTE BICKHAM, CAMARA CHERRY-AMOS, JOHN DOMPIERRE, JASON L. JACKSON,** and **ANDREW WYATT**, knowingly transported, and attempted and conspired with one or more other persons to knowingly transport, an individual, that is, Jane Doe 2, a minor under the age of 18, in interstate commerce, from the District of New Mexico to the District of Arizona, with the intent that Jane Doe 2 engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

In violation of 18 U.S.C. §§ 2423(a) and (e).

Count 3

Beginning in or about November 2017, and continuing until in or about January 2018, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendant, **CHANTE BICKHAM**, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means Jane Doe 2, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Jane Doe 2 to engage in a commercial sex act, and knowing, and in reckless disregard of the fact, and having a reasonable opportunity to

observe Jane Doe 2, that Jane Doe 2 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a) and (b)(2), and 18 U.S.C. § 2.

Count 4

Beginning in or about February 2017 and continuing until in or about January 2018, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **CAMARA CHERRY-AMOS**, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means Jane Doe 2, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Jane Doe 2 to engage in a commercial sex act, and knowing, and in reckless disregard of the fact, and having a reasonable opportunity to observe Jane Doe 2, that Jane Doe 2 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a) and (b)(2), and 18 U.S.C. § 2.

Count 5

In or about December 2017, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **JOHN DOMPIERRE**, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means Jane Doe 2, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Jane Doe 2 to engage in a commercial sex act, and knowing, and in reckless disregard of the fact, and having a reasonable opportunity to observe Jane Doe 2, that Jane Doe 2 had not attained the age of 18

years and would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a) and (b)(2), and 18 U.S.C. § 2.

Count 6

Beginning in or about April 2017, and continuing until in or about June 2017, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **BREEAUNA LANGTON**, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means Jane Doe 1, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Jane Doe 1 to engage in a commercial sex act, and knowing, and in reckless disregard of the fact, and having a reasonable opportunity to observe Jane Doe 1, that Jane Doe 1 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a) and (b)(2), and 18 U.S.C. § 2.

Count 7

Beginning in or about April 2017, and continuing until in or about June 2017, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **KERON EUGENE LUCIOUS**, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means Jane Doe 1, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Jane Doe 1 to engage in a commercial sex act, and knowing, and in reckless disregard of the fact, and having a reasonable opportunity to observe Jane Doe 1, that Jane Doe 1 had not attained the age of 18 years and

would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a) and (b)(2), and 18 U.S.C. § 2.

Count 8

Beginning in or about May 2017, and continuing until in or about June 2017, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **JASON L. JACKSON**, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means Jane Doe 1, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Jane Doe 1 to engage in a commercial sex act, and knowing, and in reckless disregard of the fact, and having a reasonable opportunity to observe Jane Doe 1, that Jane Doe 1 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a) and (b)(2), and 18 U.S.C. § 2.

Count 9

Beginning in or about February 2017, and continuing in or about January 2018, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **JASON L. JACKSON**, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means Jane Doe 2, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Jane Doe 2 to engage in a commercial sex act, and knowing, and in reckless disregard of the fact, and having a reasonable opportunity to observe Jane Doe 2, that Jane Doe 2 had not attained the age of 18 years and would be caused to

engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a) and (b)(2), and 18 U.S.C. § 2.

Count 10

Beginning in or about May 2017, and continuing until in or about June 2017, in Bernalillo County, in the District of New Mexico and elsewhere, the defendant, **DEVIN PERKINS**, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means Jane Doe 1, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Jane Doe 1 to engage in a commercial sex act, and knowing, and in reckless disregard of the fact, and having a reasonable opportunity to observe Jane Doe 1, that Jane Doe 1 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a) and (b)(2), and 18 U.S.C. § 2.

Count 11

Beginning in or about November 2017, and continuing in or about January 2018, in Bernalillo County, in the District of New Mexico, and elsewhere, the defendant, **ANDREW WYATT**, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means Jane Doe 2, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause Jane Doe 2 to engage in a commercial sex act, and knowing, and in reckless disregard of the fact, and having a reasonable opportunity to observe Jane Doe 2, that Jane Doe 2 had not attained the age of 18 years and would be caused to

engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a) and (b)(2), and 18 U.S.C. § 2.

A TRUE BILL:

/s/

FOREPERSON OF THE GRAND JURY



Assistant United States Attorney

04/09/18 1:55PM