

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

CR 15

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UNITED STATES OF AMERICA

v.

DUJUAN HARRIS,

Defendant.

Criminal Case No. _____

In Violation of 18 U.S.C. §§ 1591(a)(1),
(a)(2), (b)(2) and (c); 18 U.S.C. § 2423(a); 18
U.S.C. §§ 2251(a) and (e); 18 U.S.C. §§
2252(a)(4)(B) and (b)(2); and 18 U.S.C.
§§ 1512(b)(1), (b)(2)(A), (b)(2)(D), and (b)(3)

INDICTMENT

The Grand Jury charges that:

COUNT I

(Sex Trafficking of a Child)

From on or about November 2014, exact date unknown, through on or about June 30, 2015, in the District of Rhode Island and elsewhere, Defendant DUJUAN HARRIS did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain or maintain by any means a person, namely MINOR VICTIM, whose identity is known to the Grand Jury, and did benefit financially and by receiving a thing of value, from participation in a venture which engaged in such acts, and knowing and in reckless disregard of the fact, and having a reasonable opportunity to observe, that MINOR VICTIM 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)(1), (a)(2), (b)(2) and (c).

COUNT II

(Transportation of a Minor with Intent to Engage in Criminal Sexual Activity)

On or about June 12, 2015, through on or about June 14, 2015, in the District of Rhode Island and elsewhere, Defendant DUJUAN HARRIS did knowingly transport MINOR VICTIM, whose identity is known to the Grand Jury and who had not attained the age of 18 years, in interstate commerce, with the intent that MINOR VICTIM engage in prostitution or sexual activity for which a person can be charged with a criminal

offense, in violation of 18 U.S.C. § 2423(a).

COUNT III
(Production of Child Pornography)

From on or about December 2015, exact date unknown, through on or about June 30, 2015, in the District of Rhode Island, Defendant DUJUAN HARRIS knowingly employed, used, persuaded, induced, enticed, and coerced a minor, MINOR VICTIM, whose identity is known to the Grand Jury, to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce, or in or affecting interstate commerce, or that the visual depiction would be produced or transmitted using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means including by computer, in violation of 18 U.S.C. § 2251(a) and (e).

COUNT IV
(Possession of Child Pornography)

From on or about December 2015, exact date unknown, through on or about June 30, 2015, in the District of Rhode Island, Defendant DUJUAN HARRIS did knowingly possess one or more matters, which contained any visual depiction that had been mailed, shipped and transported in interstate and foreign commerce, and which was produced using materials which had been mailed, shipped, or transported in interstate and foreign commerce, by any means including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct, in violation of 18 U.S.C. § 2252(a)(4)(B) and (b)(2).

COUNT V
(Witness Tampering)

On various dates between on or about August 19, 2015, through on or about September 15, 2015, in the District of Rhode Island, Defendant DUJUAN HARRIS did knowingly intimidate, threaten, corruptly persuade, and engage in misleading conduct toward MINOR VICTIM and attempted the same, including, but not limited to, making the following statements to MINOR VICTIM:

- a) "I don't want you talking to nobody;"
- b) "The fact of her admitting that she was f***ing prostituting, she's going to jail;"
- c) "Don't ever, ever, ever let police try to contact you;"
- d) "You know I got people checking down there;"
- e) "Tell them to go f*** themselves. . . If she comes up here, they are going to lock her the f*** up;"
- f) "Don't be talking to nobody. . . I don't care what the father saying. . . they are using that against me. . . If she talks, they're using that against me;"
- g) "Stop talking to the police;"
- h) "You know how dangerous I am out on the streets. . .Blood don't f*** around;"
- i) "Tell her don't be talking to no police. . . no conversation. . . no nothing. . . She doesn't know nothing. She hasn't seen nothing. She hasn't heard nothing;" and
- j) "Someone over there?. . . Do you want me to come over there and kill everyone in the f***ing house?"
- k) "F*** doing what's best. . . she needs mother f***ing get someone out of mother f***ing jail."

with the intent to influence, delay, and prevent the testimony of MINOR VICTIM in an official proceeding, with the intent to cause and induce MINOR VICTIM to withhold testimony from an official proceeding, with the intent to cause and induce MINOR VICTIM to be absent from an official proceeding to which MINOR VICTIM had been summoned by legal process, to wit the Grand Jury, and with the intent to hinder, delay, and prevent the communication to a law enforcement officer of information relating to

the commission of a Federal offense, in violation of 18 U.S.C. §§ 1512(b)(1), (b)(2)(A), (b)(2)(D), and (b)(3) .

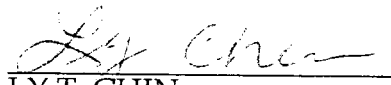
FORFEITURE ALLEGATION

Upon conviction of the offenses alleged in Counts I, II, III, and IV of this Indictment, Defendant DUJUAN HARRIS shall forfeit to the United States under 18 U.S.C. §§ 1594(a)(1), 2428 (a)(1) and 2253, his interest in any and all matters which contain any visual depiction(s) produced or possessed in violation thereof; any property, real or personal, constituting or traceable to gross profits or other proceeds the defendant obtained from such offense(s); and any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property including the following:

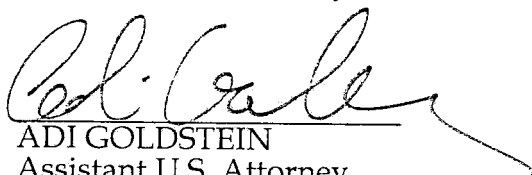
- a) One Samsung cell phone.

PETER F. NERONHA,
United States Attorney

A TRUE BILL:


LY T. CHIN
Assistant U.S. Attorney

REDACTED


ADI GOLDSTEIN
Assistant U.S. Attorney
Criminal Division Chief

Date: 9/14/15