

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

RALPH WALLACE,
a/k/a "Chase"
a/k/a "Prize"

Defendant.

INDICTMENT

25 Cr.

25 CRIM 171

COUNT ONE

(Sex Trafficking by Force, Fraud, or Coercion)
(Victim-1)

The Grand Jury charges:

Overview

1. RALPH WALLACE, a/k/a "Chase," a/k/a "Prize," the defendant, is a self-declared "pimp." From at least in or around 2021 through in or around March 2025, WALLACE recruited women he met, including through online dating applications, to engage in commercial sex for his own benefit and enrichment. WALLACE took nude photographs of the women and posted them in online advertisements for commercial sex. WALLACE instructed the women how to dress, how to act, and how much to charge for commercial sex acts. WALLACE took all of the proceeds that the women made from the commercial sex.

2. On multiple occasions, including when women did not want to engage in commercial sex, RALPH WALLACE, a/k/a "Chase," a/k/a "Prize," the defendant, used violence and coercion to compel the women to continue working for him. This included, for example, beating, punching, choking, and dragging women on multiple occasions. WALLACE also withheld from the women money for basic necessities, such as food and toiletries, unless they agreed to continue engaging in commercial sex on his behalf.

Statutory Allegations

3. From at least in or about November 2022, up to and including in or about March 2025, in the Southern District of New York and elsewhere, RALPH WALLACE, a/k/a “Chase,” a/k/a “Prize,” the defendant, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause the person to engage in a commercial sex act, and attempted and willfully caused the same, to wit, WALLACE recruited, enticed, harbored, transported, provided, and maintained a female victim (“Victim-1”), and attempted to recruit, entice, harbor, transport, provide and maintain Victim-1, to cause Victim-1 to engage in commercial sex acts, knowing and in reckless disregard of the fact that Victim-1 was engaging in commercial sex acts as a result of force, fraud, and coercion.

(Title 18, United States Code, Sections 1591(a), (b)(1), and 1594(a).)

COUNT TWO **(Sex Trafficking by Force, Fraud, or Coercion)** **(Victim-2)**

The Grand Jury further charges:

4. From at least in or about March 2023, up to and including in or about November 2023, in the Southern District of New York and elsewhere, RALPH WALLACE, a/k/a “Chase,” a/k/a “Prize,” the defendant, in and affecting interstate and foreign commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited by any means a person, and did benefit, financially and by receiving anything of

value, from participation in a venture which has engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause the person to engage in a commercial sex act, and attempted and willfully caused the same, to wit, WALLACE recruited, enticed, harbored, transported, provided, and maintained a female victim ("Victim-2"), and attempted to recruit, entice, harbor, transport, provide and maintain Victim-2, to cause Victim-2 to engage in commercial sex acts, knowing and in reckless disregard of the fact that Victim-2 was engaging in commercial sex acts as a result of force, fraud, and coercion.

(Title 18, United States Code, Sections 1591(a), (b)(1), and 1594(a).)

COUNT THREE
(Transportation to Engage in Prostitution)

The Grand Jury further charges:

5. From at least in or about November 2022, up to and including in or about October 2024, in the Southern District of New York and elsewhere, RALPH WALLACE, a/k/a "Chase," a/k/a "Prize," the defendant, knowingly transported an individual in interstate and foreign commerce with intent that the individual engage in prostitution, and attempted and willfully caused the same, to wit, WALLACE transported Victim-1 in interstate and foreign commerce, including in New Jersey, Pennsylvania, Connecticut, North Carolina, and/or Florida, on multiple occasions with the intent that Victim-1 engage in prostitution.

(Title 18, United States Code, Section 2421(a).)

FORFEITURE ALLEGATION

6. As a result of committing the offenses alleged in Count One and Count Two of this Indictment, RALPH WALLACE, a/k/a "Chase," a/k/a "Prize," the defendant, shall forfeit to the

United States, pursuant to Title 18, United States Code, Section 1594, any and all property, real and personal, involved in, used, or intended to be used to commit or to facilitate the commission of said offenses; any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offenses; and any and all property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offenses and proceeds traceable to the commission of said offenses.

7. As a result of committing the offense alleged in Count Three of this Indictment, RALPH WALLACE, a/k/a "Chase," a/k/a "Prize," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428, any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense; and any and all property, real or personal, that was used or intended to be used to commit or facilitation the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.


Substitute Assets Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

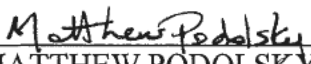
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 1594;
Title 18, United States Code, Section 2428;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON



MATTHEW PODOLSKY
Acting United States Attorney