

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

SEALED INDICTMENT

- v. -

17 Cr.

ADRIAN BROOKS,
a/k/a "Abee,"

Defendant.

17 CRIM 607

- - - - - x

COUNT ONE

(Sex Trafficking Conspiracy)

The Grand Jury charges:

1. From at least in or about January 2014, up to and including at least in or about January 2017, ADRIAN BROOKS, a/k/a "Abee," the defendant, directed and operated a domestic sex trafficking and prostitution enterprise (the "Enterprise"), in which he exploited vulnerable women, including minors (the "victims") for his own profit. BROOKS employed diverse tactics to maintain and control the victims he sold for sex, including by forcing them to take prescription drugs to which they became addicted, intimidating them, and employing violence and threats of violence. BROOKS also used cell phones and the Internet to run the Enterprise.

2. Once ADRIAN BROOKS, a/k/a "Abee," the defendant, recruited his victims, he regularly advertised them on a

classifieds website called Backpage.com ("Backpage"). At all times relevant to this Indictment, Backpage was a classifieds website that, among other things, was sometimes used by sex traffickers and others to advertise women, men, girls, and boys for commercial sex. To evade detection by law enforcement, such advertisements often purported to be offering individuals as mere escorts. However, such advertisements often signaled that they were, in fact, offering individuals for sale for commercial sex acts through a variety of cues, including pictures of scantily-clad minor and adult women in sexually provocative poses, with coded language indicating that the people being offered will perform commercial sex acts. These Backpage advertisements typically contained a callback phone number that potential customers were to text or call in order to respond to the advertisement and set up an appointment for commercial sex.

3. ADRIAN BROOKS, a/k/a "Abee," the defendant, typically offered his victims for commercial sex in motels in or around the Bronx and Yonkers, New York and on the street. BROOKS often provided his victims with cell phones to use to answer calls from potential customers and communicated with his victims by cell phone. Advertisements on Backpage were typically posted via cell phone from BROOKS' phone.

4. Victims recruited by ADRIAN BROOKS, a/k/a "Abee," the defendant, typically engaged in commercial sex with multiple

customers in a single day. Customers typically paid for commercial sex with BROOKS' victims in cash. All or most of the victims' earnings from engaging in commercial sex was taken by BROOKS.

5. ADRIAN BROOKS, a/k/a "Abee," the defendant, forced certain of his victims to take prescription pain relievers, to which they became addicted. In addition, BROOKS provided other narcotics to his victims, including cocaine to at least one victim and an antipsychotic medication to another.

6. ADRIAN BROOKS, a/k/a "Abee," the defendant, set rules for his victims, controlled their actions, and punished violations of his rules and disobedience by using physical violence. BROOKS threatened violence and physically beat his victims for, among other things, indicating an intention to leave the Enterprise and holding back earnings from commercial sex from BROOKS.

STATUTORY ALLEGATIONS

7. From at least in or about January 2014, up to and including at least in or about January 2017, in the Southern District of New York and elsewhere, ADRIAN BROOKS, a/k/a "Abee," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Sections 1591(a) and (b).

8. It was a part and object of the conspiracy that ADRIAN BROOKS, a/k/a "Abee," the defendant, and others known and unknown, would and did, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and did benefit, financially and by receiving things of value, from participation in a venture which had engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion 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, in violation of Title 18, United States Code, Sections 1591(a) and (b)(1).

(Title 18, United States Code, Section 1594(c).)

COUNT TWO

(Sex Trafficking of Minor Victim-1)

The Grand Jury further charges:

9. From at least in or about January 2014, up to and including at least in or about June 2016, in the Southern District of New York and elsewhere, ADRIAN BROOKS, a/k/a "Abee," the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and did benefit, financially and

by receiving things of value, from participation in a venture which had engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years, and that means of force, threats of force, fraud, coercion 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 did aid and abet the same, to wit, BROOKS recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited, and aided and abetted the recruitment, harboring, transport, and advertisement of, an individual who was less than 18 years old ("Minor Victim-1"), in the Bronx, New York, Yonkers, New York, and elsewhere, who was then caused to engage in at least one commercial sex act by means of force, threats of force, fraud, and coercion, which sex act benefitted BROOKS financially.

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

COUNT THREE

(Sex Trafficking of Minor Victim-2)

The Grand Jury further charges:

10. From at least in or about March 2016, up to and including at least in or about January 2017, in the Southern

District of New York and elsewhere, ADRIAN BROOKS, a/k/a "Abee," the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person, and did benefit, financially and by receiving things of value, from participation in a venture which had engaged in any such act, and having had a reasonable opportunity to observe such person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years, and that means of force, threats of force, fraud, coercion 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 did aid and abet the same, to wit, BROOKS recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited, and aided and abetted the recruitment, harboring, transport, and advertisement of, an individual who was less than 18 years old ("Minor Victim-2"), in the Bronx, New York, Yonkers, New York, and elsewhere, who was then caused to engage in at least one commercial sex act by means of force, threats of force, fraud, and coercion, which sex act benefitted BROOKS financially.

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

COUNT FOUR

(Use of Interstate Commerce to Promote Unlawful Activity)

The Grand Jury further charges:

11. From at least in or about January 2014, up to and including at least in or about January 2017, in the Southern District of New York and elsewhere, ADRIAN BROOKS, a/k/a "Abee," the defendant, did travel in interstate and foreign commerce and use and cause to be used the mail and facilities in interstate and foreign commerce, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, and thereafter performed and attempted to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment and carrying on of such unlawful activity, to wit, BROOKS used cellular phones and the Internet to promote, manage, establish, and carry on a criminal business enterprise engaged in sex trafficking and promoting prostitution, in violation of New York Penal Law §§ 230.20 and 230.34.

(Title 18, United States Code, Sections 1952(a)(3) and 2.)

FORFEITURE ALLEGATION

12. As a result of committing one or more of the offenses charged in Counts One through Four of this Indictment, ADRIAN BROOKS, a/k/a "Abee," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section

1594(d)(1), any property, real and personal, that was involved in, used, and intended to be used to commit and to facilitate the commission of the offenses alleged in Counts One through Three of this Indictment, and any property traceable thereto, and, pursuant to Title 18, United States Code, Sections 1594(d)(2) and 981(a)(1)(C), and Title 28, United States Code, Section 2461, any property, real and personal, constituting and derived from, any proceeds obtained, directly or indirectly, as a result of the offenses alleged in Counts One through Four of this Indictment, or any property traceable to such property.

Substitute Asset Provision

13. 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 21 U.S.C. § 853(p) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the

defendant up to the value of the forfeitable property described above.

(Title 18, United States Code, Sections 981 and 1594;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


JOON H. KIM
Acting United States Attorney

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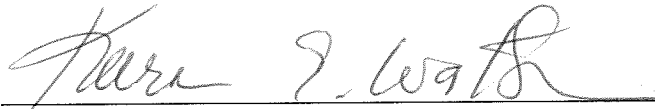
INDICTMENT

17 Cr.

(18 U.S.C. §§ 1591(a), (b)(1), and (b)(2),
1594(c), 1952(a)(3), and 2.)

JOON H. KIM

Acting United States Attorney


Foreperson
