

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
:   
UNITED STATES OF AMERICA : SEALED  
: INDICTMENT  
:   
- v. - :   
: 18 Cr. \_\_\_\_\_  
:   
RUBEN MORCIGLIO, :   
a/k/a "El Tribu," :   
a/k/a "El Diablo," :   
and :   
CARLTON VANIER, :   
a/k/a "Lucky," :   
:   
Defendants. :   
:   
- - - - - X

COUNT ONE

(Conspiracy to Commit Sex Trafficking)

The Grand Jury charges:

1. From in or about 2011, up to and including in or about October 2018, within the Southern District of New York and elsewhere, RUBEN MORCIGLIO, a/k/a "El Tribu," a/k/a "El Diablo," and CARLTON VANIER, a/k/a "Lucky," the defendants, together with others known and unknown, did willfully and knowingly combine, conspire, confederate, and agree together and with each other to commit sex trafficking, in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2) and (b).

2. Victims of the defendants' sex trafficking conspiracy included minor girls who resided at a particular non-incarceratory residential treatment facility located in

Westchester County, New York ("Facility-1"), which provided housing for at-risk and troubled children and adolescents on behalf of departments of social services for certain counties in New York State.

3. It was a part and an object of the conspiracy that RUBEN MORCIGLIO, a/k/a "El Tribu," a/k/a "El Diablo," and CARLTON VANIER, a/k/a "Lucky," the defendants, and others known and unknown, willfully and knowingly, in and affecting interstate and foreign commerce, would and did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means one and more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause such persons to engage in one or more commercial sex acts, and (2) one or more such persons had not attained the age of 18 years and would be caused to engage in one and more commercial sex acts, to wit, MORCIGLIO and VANIER recruited minor girls to engage in prostitution at

various locations in and around the New York area, including at least one minor victim who was, at various points, a resident of Facility-1.

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

COUNT TWO

(Sex Trafficking)

The Grand Jury further charges:

4. The allegations in paragraph 2 of this Indictment are repeated and realleged as if fully set forth herein.

5. From in or about August 2017, up to and including in or about October 2017, within the Southern District of New York and elsewhere, RUBEN MORCIGLIO, a/k/a "El Tribu," a/k/a "El Diablo," 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 one or more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause such persons to engage in one or more commercial sex acts, and (2) that one or more such persons had not attained the age of 18 years and would be caused

to engage in one and more commercial sex acts, to wit, MORCIGLIO recruited, harbored, transported, provided, obtained, advertised, and maintained a minor victim ("Victim-1"), who at various points was a resident of Facility-1, and through force, threats of force, fraud, coercion, and a combination of such means, was caused to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to MORCIGLIO.

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

COUNT THREE

(Sex Trafficking)

The Grand Jury further charges:

6. The allegations in paragraph 2 of this Indictment are repeated and realleged as if fully set forth herein.

7. In or about August 2018, within the Southern District of New York and elsewhere, CARLTON VANIER, a/k/a "Lucky," 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 one or more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud,

coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause such persons to engage in one or more commercial sex acts, and (2) that one or more such persons had not attained the age of 18 years and would be caused to engage in one and more commercial sex acts, to wit, VANIER recruited, harbored, transported, provided, obtained, advertised, and maintained a minor victim ("Victim-1"), who at various points was a resident of Facility-1, and through force, threats of force, fraud, coercion, and a combination of such means, was caused to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to VANIER.

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

COUNT FOUR

(Sex Trafficking)

The Grand Jury further charges:

8. From in or about 2011, for approximately two months, within the Southern District of New York and elsewhere, RUBEN MORCIGLIO, a/k/a "El Tribu," a/k/a "El Diablo," 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 one or more persons, and did benefit, financially and by

receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause such persons to engage in one or more commercial sex acts, and (2) that one or more such persons had not attained the age of 18 years and would be caused to engage in one and more commercial sex acts, to wit, MORCIGLIO recruited, harbored, transported, provided, obtained, advertised, and maintained a minor victim ("Victim-2"), who through force, threats of force, fraud, coercion, and a combination of such means, was caused to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to MORCIGLIO.

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

COUNT FIVE

(Sex Trafficking)

The Grand Jury further charges:

9. From in or about 2011, for approximately two months, within the Southern District of New York and elsewhere, CARLTON VANIER, a/k/a "Lucky," 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 one or more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause such persons to engage in one or more commercial sex acts, and (2) that one or more such persons had not attained the age of 18 years and would be caused to engage in one and more commercial sex acts, to wit, VANIER recruited, harbored, transported, provided, obtained, advertised, and maintained a minor victim ("Victim-2"), who through force, threats of force, fraud, coercion, and a combination of such means, was caused to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to VANIER.

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

#### FORFEITURE ALLEGATIONS

1. As a result of committing the offenses alleged in Counts One through Four of this Indictment, RUBEN MORCIGLIO, a/k/a "El Tribu," a/k/a "El Diablo," and CARLTON VANIER, a/k/a "Lucky," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), any

property, real and personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of the offenses alleged in Counts One through Five, and any property, real and personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses alleged in Counts One through Five, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendants personally obtained.

Substitute Asset Provision

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

(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

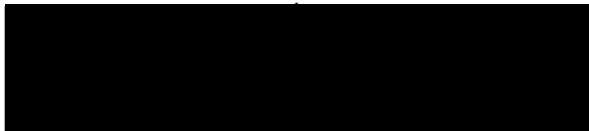
(e) has been commingled with other property which cannot be subdivided without difficulty;

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 said defendants up to the value of the above  
forfeitable property.

(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

*Geoffrey S. Berman*  
GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-338-274 (Ed. 9-25-58)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

RUBEN MORCIGLIO,  
a/k/a "El Tribu" a/k/a "El Diablo" and  
CARLTON VANIER,  
a/k/a "Lucky,"

Defendants.

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INDICTMENT

18 Cr. \_\_\_\_\_

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

