

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
UNITED STATES OF AMERICA :
 : SEALED
 : SUPERSEDING
 - v. - : INDICTMENT
 :
 NAZEER VICKERS, : S1 18 Cr. 530 (LGS)
 a/k/a "Z," :
 :
 Defendant. :
 :
 - - - - - x

COUNT ONE

(Conspiracy to Commit Sex Trafficking)

The Grand Jury charges:

1. From in or about June 2017, up to and including in or about August 2017, within the Southern District of New York and elsewhere, NAZEER VICKERS, a/k/a "Z," the defendant, 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. Other victims of the conspiracy were young women who had reached 18 years of age.

3. It was a part and an object of the conspiracy that NAZEER VICKERS, a/k/a "Z," the defendant, 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 and more commercial sex acts, and (2) one and 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, VICKERS recruited women and minor girls to engage in prostitution at various locations in and around the New York area, including at least two minor victims and one adult victim, who were, at various points, residents of Facility-1.

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

COUNT TWO

(Attempted Sex Trafficking)

The Grand Jury further charges:

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

5. From in or about June 2017, up to and including in or about August 2017, within the Southern District of New York and elsewhere, NAZEER VICKERS, a/k/a "Z," the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did attempt to 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, VICKERS recruited a minor victim ("Victim-1") from Facility-1, and, through force, threats of

force, fraud, coercion, and a combination of such means, attempted to cause her to engage in at least one commercial sex act.

(Title 18, United States Code, Sections 1591(a), (b)(1), (b)(2), 1594(a), and 2.)

COUNT THREE

(Sex Trafficking)

The Grand Jury further charges:

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

7. From in or about June 2017, up to and including in or about August 2017, within the Southern District of New York and elsewhere, NAZEER VICKERS, a/k/a "Z," 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 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, VICKERS recruited a minor victim ("Victim-2") from Facility-1, and, through force, threats of force, fraud,

coercion, and a combination of such means, caused Victim-2 to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to VICKERS.

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

FORFEITURE ALLEGATIONS

8. As a result of committing the offenses alleged in Counts One through Three of this Indictment, NAZEER VICKERS, a/k/a "Z," the defendant, 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 Three, 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 Three, 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 defendant personally obtained.

Substitute Asset Provision

9. 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;

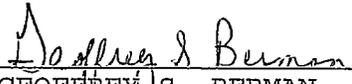
(d) has been substantially diminished in value; or

(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 said defendant 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.)


FOR PERSON



GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

NAZEER VICKERS,
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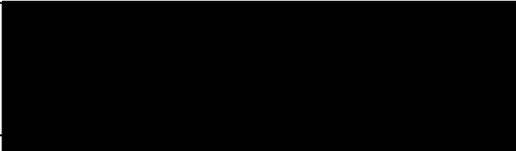
Defendant.

INDICTMENT

S1 18 Cr. 530 (LGS)

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

GEOFFREY S. BERMAN


Foreperson
