

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:   
UNITED STATES OF AMERICA : SEALED  
: SUPERSEDING  
- v. - : INDICTMENT  
:   
JABARI KENNEDY, : S1 18 Cr. 529 (JFK)  
a/k/a "Poppa," and :   
CIMMIE WRIGHT, :   
:   
Defendants. :   
:   
- - - - - x

COUNT ONE

(Conspiracy to Commit Sex Trafficking)

The Grand Jury charges:

1. From in or about January 2017, up to and including in or about May 2018, within the Southern District of New York and elsewhere, JABARI KENNEDY, a/k/a "Poppa," and CIMMIE WRIGHT, 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. 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 JABARI KENNEDY, a/k/a "Poppa," and CIMMIE WRIGHT, 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 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, KENNEDY and WRIGHT recruited women and minor girls to engage in prostitution at various locations in and around the New York area, including at least six 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

(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. In or about March 2017, within the Southern District of New York and elsewhere, JABARI KENNEDY, a/k/a "Poppa," 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, KENNEDY recruited a minor victim ("Victim-1") from Facility-1, enticed, harbored, transported, provided, obtained, advertised, and maintained Victim-2, and,

through force, threats of force, fraud, coercion, and a combination of such means, caused Victim-1 to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to KENNEDY.

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

COUNT THREE

(Sex Trafficking)

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 February 2017, up to and including in or about September 2017, within the Southern District of New York and elsewhere, JABARI KENNEDY, a/k/a "Poppa," 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 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, to wit,

KENNEDY recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained an adult victim ("Victim-2"), formerly a resident of 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 KENNEDY.

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

COUNT FOUR

(Sex Trafficking)

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

9. , From in or about September 2017, up to and including in or about November 2017, within the Southern District of New York and elsewhere, CIMMIE WRIGHT, 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,

WRIGHT recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained a minor victim ("Victim-3"), formerly a resident of Facility-1, and caused Victim-3 to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to WRIGHT.

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

#### FORFEITURE ALLEGATIONS

10. As a result of committing the offenses alleged in Counts One through Three of this Indictment, JABARI KENNEDY, a/k/a "Poppa," and CIMMIE WRIGHT, 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 Four, 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 defendants personally obtained.

#### Substitute Asset Provision

11. 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;

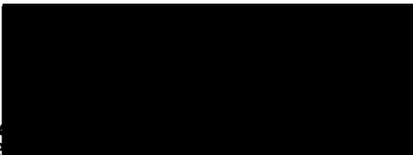
(d) has been substantially diminished in value; or

(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 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

  
Geoffrey S. Berman  
GEOFFREY S. BERMAN  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

JABARI KENNEDY,  
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Defendants.

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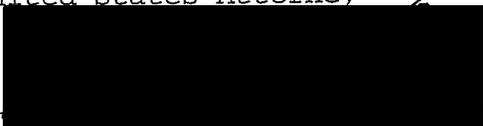
INDICTMENT

S1 18 Cr. 529 (JFK)

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

GEOFFREY S. BERMAN  
United States Attorney

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Foreperson

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