

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

UNITED STATES OF AMERICA :

SEALED INDICTMENT

- v. - :

17 Cr.

JAMEL GODDARD, :

a/k/a "Payroll," :

**17 CRIM 439**

Defendant. :

- - - - - x

COUNT ONE

(Sex Trafficking Conspiracy)

The Grand Jury charges:

The Goddard Sex Trafficking/Prostitution Enterprise

1. From at least in or about 2012, up to and including at least on or about July 6, 2017, JAMEL GODDARD, a/k/a "Payroll," the defendant, directed and operated a domestic sex trafficking and prostitution enterprise (the "Enterprise"), the purpose of which was sexually exploiting vulnerable minor and adult women (the "victims") for his own profit. GODDARD employed diverse tactics to recruit, maintain, and control the victims he sold for sex, including manipulation, intimidation, coercion, threats, and violence. GODDARD also traveled interstate and used cell phones and the Internet to run the Enterprise.

2. JAMEL GODDARD, a/k/a "Payroll," the defendant, typically recruited vulnerable minor and adult victims who

lacked education, a stable home, family support, and who had suffered past physical and emotional trauma. GODDARD often exploited victims' need for shelter, stability, and affection as a means to sexually exploit the victims for his own financial gain.

3. Once JAMEL GODDARD, a/k/a "Payroll," 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.

4. JAMEL GODDARD, a/k/a "Payroll," the defendant, typically offered his victims for commercial sex in motels in or

around the Bronx and Brooklyn in New York City, upstate New York, and in or around other states, including New Jersey, Connecticut, Rhode Island, and Florida. GODDARD 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 either from GODDARD's phones, or from victims' phones at GODDARD's direction.

5. Victims recruited by JAMEL GODDARD, a/k/a "Payroll," the defendant, typically engaged in commercial sex with multiple customers in a single day. Customers typically paid for commercial sex with GODDARD's victims in cash, and the victims were able to earn thousands of dollars from engaging in commercial sex in a single day. All or most of the victims' earnings from engaging in commercial sex was taken by GODDARD.

6. JAMEL GODDARD, a/k/a "Payroll," the defendant, commonly designated one or more individuals to manage the Enterprise and the victims engaging in commercial sex acts for GODDARD. This designated individual was usually a woman and was referred to as GODDARD's "bottom." The responsibilities of the bottom typically included recruiting, overseeing, and training new women and girls engaging in commercial sex, collecting earnings from commercial sex for GODDARD, and reporting any disobedience to GODDARD.

7. JAMEL GODDARD, a/k/a "Payroll," the defendant, set rules for his victims, controlled their actions, and punished violations of his rules and disobedience by using physical violence. GODDARD threatened violence and physically beat his victims for, among other things, being disrespectful, owing GODDARD money, and holding back earnings from commercial sex from GODDARD.

#### STATUTORY ALLEGATIONS

8. From at least in or about 2012, up to and including at least on or about July 6, 2017, in the Southern District of New York and elsewhere, JAMEL GODDARD, a/k/a "Payroll," 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).

9. It was a part and object of the conspiracy that JAMEL GODDARD, a/k/a "Payroll," 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).

10. It was further a part and object of the conspiracy that JAMEL GODDARD, a/k/a "Payroll," 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, 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 would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a) and (b)(2).

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

**COUNT TWO**

**(Sex Trafficking of Adult Victim-1)**

The Grand Jury further charges:

11. In or about July 2012, in the Southern District of New York and elsewhere, JAMEL GODDARD, a/k/a "Payroll," 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, 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, and did aid and abet the same, to wit, GODDARD recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited, and aided and abetted the recruitment, harboring, transport, and advertisement of, an individual ("Adult Victim-1"), in the Bronx, 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 GODDARD financially.

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

**COUNT THREE**

**(Sex Trafficking of Minor Victim-1)**

The Grand Jury further charges:

12. In or about 2015, in the Southern District of New York and elsewhere, JAMEL GODDARD, a/k/a "Payroll," 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 would be caused to engage in a commercial sex act, and did aid and abet the same, to wit, GODDARD 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 and elsewhere, who was then caused to engage in at least one commercial sex act, which sex act benefitted GODDARD financially.

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

COUNT FOUR

**(Use of Interstate Commerce to Promote Unlawful Activity)**

The Grand Jury further charges:

13. From at least in or about 2012, up to and including at least on or about July 6, 2017, in the Southern District of New

York and elsewhere, JAMEL GODDARD, a/k/a "Payroll," 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, GODDARD used cellular phones and the Internet, and traveled interstate, 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**

14. As a result of committing one or more of the offenses charged in Counts One through Four of this Indictment, JAMEL GODDARD, a/k/a "Payroll," 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 Four 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

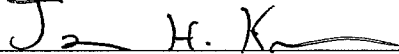
15. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (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.)

  
FORFEITURE

  
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JOON H. KIM  
Acting 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.

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a/k/a "Payroll,"

Defendant.

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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

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Acting United States Attorney

  
Foreperson

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