

1 Presented to the Court by the foreman of the  
2 Grand Jury in open Court, in the presence of  
3 the Grand Jury and FILED in the U.S.  
4 DISTRICT COURT at Seattle, Washington.

5 \_\_\_\_\_ April 26, 2023  
6 Ravi Subramanian, Clerk  
7 By \_\_\_\_\_ Deputy

8 UNITED STATES DISTRICT COURT FOR THE  
9 WESTERN DISTRICT OF WASHINGTON  
10 AT SEATTLE

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 WINSTON BURT,  
15 Defendant.

No. **CR 23 - 066 JHC**  
**INDICTMENT**

16 The Grand Jury charges that:

17 **COUNT 1**

18 **(Sex Trafficking of an Adult Female (AF1) by Force, Fraud, and Coercion)**

19 Beginning in or about 2021, and continuing until on or about November 5, 2022, in  
20 King County, within the Western District of Washington, and elsewhere, WINSTON  
21 BURT did, in and affecting interstate commerce, knowingly recruit, entice, harbor,  
22 transport, provide, obtain, and maintain, by any means, an adult female, AF1, knowing  
23 and with reckless disregard of the fact that force, threats of force, fraud, and coercion, and  
24 any combination of such means, would be used to cause AF1 to engage in a commercial  
25 sex act.

26 All in violation of Title 18, United States Code, Sections 1591(a)(1) and  
27 1591(b)(1).



1 firearm, that is, a Glock 27 .40 caliber handgun bearing serial number ACWD881, which had  
2 been shipped and transported in interstate and foreign commerce.

3 All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

4 **FORFEITURE ALLEGATION**

5 The allegations in Counts 1 through 4 of this Indictment are hereby realleged and  
6 incorporated by reference herein for the purpose of alleging forfeiture.

7 Upon conviction of the offense charged in Count 1, WINSTON BURT shall  
8 forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d),  
9 any property that constitutes or is derived from proceeds of the offense, as well as any  
10 property involved in, used, or intended to be used to commit or facilitate commission of  
11 the offense. Such property includes, but is not limited to, a judgment for a sum of money  
12 in the amount of proceeds WINSTON BURT obtained as a result of the offense as well as  
13 the following property seized from WINSTON BURT's person, residence, and vehicle:

- 14 a. \$20,090.00 in United States currency;
- 15 b. \$724.00 in United States currency;
- 16 c. \$3,350.00 in United States currency;
- 17 d. \$500.00 in United States currency;
- 18 e. one Audemars Piguet watch encrusted with diamonds;
- 19 f. one 14k white gold necklace encrusted with 1,616 round brilliant  
20 diamonds;
- 21 g. one 14k white gold ring encrusted with 339 round brilliant diamonds;
- 22 h. one FN 5.7mm pistol and any associated ammunition; and
- 23 i. one Glock 27 .40 caliber handgun bearing serial number ACWD881 and  
24 any associated ammunition.

25 Upon conviction of the offense charged in Count 2, WINSTON BURT shall  
26 forfeit to the United States, pursuant to Title 18, United States Code, Section 2428(a) any  
27 property that constitutes or is derived from proceeds of the offense, as well as any

1 property used or intended to be used to commit or facilitate the offense. Such property  
2 includes, but is not limited to, a judgment for a sum of money in the amount of proceeds  
3 WINSTON BURT obtained as a result of the offense as well as the following property  
4 seized from WINSTON BURT's person, residence, and vehicle:

- 5 a. \$20,090.00 in United States currency;
- 6 b. \$724.00 in United States currency;
- 7 c. \$3,350.00 in United States currency;
- 8 d. \$500.00 in United States currency;
- 9 e. one Audemars Piguet watch encrusted with diamonds;
- 10 f. one 14k white gold necklace encrusted with 1,616 round brilliant diamonds;
- 11 g. one 14k white gold ring encrusted with 339 round brilliant diamonds;
- 12 h. one FN 5.7mm pistol and any associated ammunition; and
- 13 i. one Glock 27 .40 caliber handgun bearing serial number ACWD881 and any  
14 associated ammunition.

15 Upon conviction of either offense charged in Counts 3 and 4, WINSTON BURT,  
16 shall forfeit to the United States, pursuant to Title 18, United States Code, Section  
17 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms and  
18 associated ammunition involved in the offense. Such property includes, but is not limited  
19 to:

- 20 a. one 14k white gold ring encrusted with 339 round brilliant diamonds;
- 21 b. one FN 5.7mm pistol and any associated ammunition; and
- 22 c. one Glock 27 .40 caliber handgun bearing serial number ACWD881 and  
23 any associated ammunition.

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1           **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
2 any act or omission of the defendant,

- 3           a.       cannot be located upon the exercise of due diligence;  
4           b.       has been transferred or sold to, or deposited with, a third party;  
5           c.       has been placed beyond the jurisdiction of the Court;  
6           d.       has been substantially diminished in value; or,  
7           e.       has been commingled with other property which cannot be divided  
8                    without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the  
10 defendant, up to the value of the above-described forfeitable property, pursuant to Title  
11 21, United States Code, Section 853(p).

12  
13                                   A TRUE BILL: '  '

14                                   DATED: 4/26/23

15  
16                                   *Signature of Foreperson redacted pursuant*  
17                                   *to the policy of the Judicial Conference of*  
18                                   *the United States.*

19                                   \_\_\_\_\_  
20                                   FOREPERSON

21                                   *Catherine L. Crisham*  
22                                   \_\_\_\_\_  
23                                   NICHOLAS W. BROWN  
24                                   United States Attorney

25                                   *Catherine L. Crisham*  
26                                   \_\_\_\_\_  
27                                   TODD GREENBERG  
                                 Assistant United States Attorney

*Catherine L. Crisham*  
                                 \_\_\_\_\_  
                                 CATHERINE L. CRISHAM  
                                 Assistant United States Attorney