

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**INDICTMENT FOR CONSPIRACY TO COMMIT SEX TRAFFICKING OF CHILDREN, SEX TRAFFICKING OF CHILDREN, COERCION AND ENTICEMENT OF AN INDIVIDUAL TO TRAVEL TO ENGAGE IN PROSTITUTION, INTERSTATE TRANSPORTATION OF A MINOR FOR THE PURPOSE OF ENGAGING IN CRIMINAL SEXUAL CONDUCT, OBSTRUCTION OF A CRIMINAL INVESTIGATION, NOTICE OF SENTENCE ENHANCEMENT, AND NOTICE OF FORFEITURE**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO.</b>
<b>v.</b>	*	<b>SECTION:</b>
<b>TAUREAN OKEITH JACKSON</b> (a/k/a/ “Marvelous Rich”) (a/k/a “Richard Jones”) (a/k/a “Richard Marvelously”)	* * * *	<b>VIOLATION: 18 U.S.C. § 2</b> <b>18 U.S.C. § 1591(a)</b> <b>18 U.S.C. § 1591(b)</b> <b>18 U.S.C. § 1594</b> <b>18 U.S.C. § 2422(a)</b> <b>18 U.S.C. § 2423(a)</b> <b>18 U.S.C. § 1591(d)</b> <b>18 U.S.C. § 2428</b>
<b>ANDREA BIRDOW</b>	* *	
	* * *	

The Grand Jury charges that:

**COUNT 1 – CONSPIRACY TO COMMIT SEX TRAFFICKING OF CHILDREN**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. **Minor Victim 1** was a juvenile female who was born in about January 1997, and who resided in the Mesquite, Texas area.

2. The defendant, **TAUREAN OKEITH JACKSON (“JACKSON”)** (a/k/a “Marvelous Rich,” a/k/a “Richard Jones,” a/k/a “Richard Marvelously”), is an adult male who resided in the Dallas, Texas area.

3. The defendant, **ANDREA BIRDOW (“BIRDOW”)**, is an adult female who

resided in the Dallas, Texas area.

4. On or about July 10, 2013, law enforcement agents identified an advertisement for suspected prostitution services posted on an online classified website. The advertisement was entitled ““GORGEOUS-CURVES-SEXXY-GIRL NEXXT DOOR-25,” and bore Post ID Number 7960316. The advertisement stated that the female “date” was “ready and more than willing to fulfill all of your erotic needs and desires.” A law enforcement official, acting in an undercover capacity, arranged a prostitution “date” to take place at a hotel located in Metairie, Louisiana, by contacting (214) 735-5277, the telephone number listed on the advertisement.

5. Subsequently, on or about July 10, 2013, law enforcement officials arrived at the hotel located in Metairie, Louisiana, where the undercover prostitution “date” had been scheduled, and arrested **Minor Victim 1** and **BIRDOW**.

**B. THE CONSPIRACY:**

Beginning at a date unknown, but prior to on or about July 10, 2013, and continuing until on or about July 10, 2013, within the Eastern District of Louisiana and elsewhere, the defendants, **TAUREAN OKEITH JACKSON** (a/k/a “**Marvelous Rich,**” a/k/a “**Richard Jones,**” a/k/a “**Richard Marvelously**”) and **ANDREA BIRDOW**, and others known and unknown to the Grand Jury, did combine, conspire, confederate, and agree to knowingly recruit, entice, transport, harbor, provide, obtain, and maintain by any means, a person, that is, **Minor Victim 1**, a 16-year-old female, and to knowingly benefit financially from participating in a venture that recruited, enticed, transported, harbored, provided, obtained, and maintained by any means, **Minor Victim 1**, in and affecting interstate commerce, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause the person to engage in a commercial sex act and that **Minor Victim 1** had not attained the age of 18 years and

that **Minor Victim 1** would be caused to engage in a commercial sex act, as that term is defined by Title 18, United States Code, Section 1591(e)(3), all in violation of Title 18, United States Code, Sections 1591(a)(1) and (a)(2).

**C. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY:**

In furtherance of the conspiracy, and to accomplish the object of the conspiracy, **JACKSON, BIRDOW**, and others, committed various overt acts within the Eastern District of Louisiana and elsewhere, including, but not limited to, the following:

1. In about March 2012, **JACKSON** created, and subsequently operated, “Star City Vixens,” an escort agency that was a front for prostitution activity. Star City Vixens had a registered business address of 1499 Regal Row, Dallas, Texas, and claimed to offer a variety of prostitution-based employment. Star City Vixens advertised “upscale adult entertainment” and stated that its “team members” would have the opportunity to travel to “major social events” throughout the country, including the Super Bowl, the NBA All-Star game, and other major sporting and entertainment events.

2. Beginning not earlier than August 2012, **JACKSON** created and hosted a regular radio show entitled “Cheap Hoes Gotta Go.” The show consisted of **JACKSON** conducting interviews with pimps and prostitutes, discussing nuances of the pimp/prostitution “game,” and providing a call-in forum to “let real pimps and hoes speak there [sic] mind.”

3. In about June 2013, **JACKSON** and **BIRDOW** met **Minor Victim 1** in the Dallas, Texas area. Shortly after their meeting, **JACKSON** and **BIRDOW** recruited **Minor Victim 1** to begin working for **JACKSON** as a prostitute. **JACKSON** required **Minor Victim 1** to turn over all, or most, of the money she earned from prostitution to **JACKSON**.

4. **JACKSON** and **BIRDOW** used vehicles, public highways, hotels, telephones,

and the Internet to facilitate commercial sex acts. Specifically, **JACKSON** and **BIRDOW** drove **Minor Victim 1** throughout Texas and Louisiana, including to Fort Worth, Texas, San Antonio, Texas, Austin, Texas, and Baton Rouge, Louisiana for the purpose of **BIRDOW** and **Minor Victim 1** engaging in prostitution.

5. As part of his business, **JACKSON** directed **Minor Victim 1** to operate on an “in call” basis, meaning that a customer would meet **Minor Victim 1** at a hotel rented and paid for by **JACKSON** or **BIRDOW** in which **BIRDOW** and **Minor Victim 1** would stay and engage in prostitution activities.

6. **JACKSON** created advertisements on an online classified ad service commonly used to advertise sexual services in exchange for money, through which **JACKSON** received telephone calls inquiring about, scheduling, and arranging prostitution calls with **BIRDOW** and **Minor Victim 1**.

7. Many of the advertisements for **Minor Victim 1** on the online ad service were posted under the category of “escorts.” In truth and in fact, the advertisements were fronts for **JACKSON’S** illegal prostitution business.

8. When a prospective customer would call and inquire about arranging a prostitution date with **BIRDOW** and/or **Minor Victim 1**, **JACKSON** would answer the call. **JACKSON** scheduled the time, location, and other logistics of each prostitution date. Occasionally, **JACKSON** would attempt to disguise his identity by answering the phone calls in a high-pitched, female voice and claiming to be related to **Minor Victim 1** or **BIRDOW**.

9. After scheduling a prostitution date with a customer, **JACKSON** would contact **BIRDOW** and notify her of the details of the impending activity.

10. **JACKSON** and **BIRDOW** provided **Minor Victim 1** with alcohol and/or illicit

and mood-altering drugs, including marijuana, numbing her senses, controlling her behavior, and/or as a means of encouraging **Minor Victim 1** to engage in acts of prostitution and keep her happy and therefore maintaining her as an employee, or as a reward for engaging in acts of prostitution.

11. On or about July 7, 2013, **JACKSON** and **BIRDOW** drove **Minor Victim 1** to the New Orleans, Louisiana area to work as a prostitute.

12. From on or about July 7, 2013, through on or about July 10, 2013, at **JACKSON'S** direction and supervision, **Minor Victim 1** worked in the New Orleans, Louisiana area as a prostitute.

13. On about July 7, 2013, **JACKSON** and **BIRDOW** rented a hotel room in **BIRDOW'S** name at a hotel located in Metairie, Louisiana, for **BIRDOW** and **Minor Victim 1** to use for their "in-call" dates arranged by **JACKSON**.

14. As a means of controlling **Minor Victim 1's** behavior and ensuring her compliance with his instructions, **JACKSON** struck **Minor Victim 1** on multiple occasions. On at least one occasion **JACKSON** beat **Minor Victim 1** across the legs and buttocks with an extension cord. Furthermore, **JACKSON** beat and choked **BIRDOW** in front of **Minor Victim 1** and told **Minor Victim 1** that he would do the same to her if she tried to leave him.

All in violation of Title 18, United States Code, Section 1594(c).

## **COUNT 2 –SEX TRAFFICKING OF CHILDREN**

### **A. AT ALL TIMES MATERIAL HEREIN:**

The allegations of Section A and C of Count 1 are hereby realleged and incorporated herein in their entirety.

**B. THE OFFENSE:**

Beginning at a time unknown, but not later than June 21, 2013, and continuing until on or about July 10, 2013, in the Eastern District of Louisiana, and elsewhere, the defendant, **TAUREAN OKEITH JACKSON (a/k/a “Marvelous Rich,” a/k/a “Richard Jones,” a/k/a “Richard Marvelously”)**, knowingly, in and affecting interstate commerce, recruited, enticed, transported, harbored, provided, obtained, and maintained, by any means, and attempted to recruit, entice, transport, harbor, provide, obtain, and maintain, **Minor Victim 1**, a person who had not attained the age of 18 years, (1) knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause **Minor Victim 1** to engage in a commercial sex act and (2) knowing and in reckless disregard of the fact that **Minor Victim 1** had not attained the age of 18 years and that **Minor Victim 1** would be caused to engage in a commercial sex act, as that term is defined by Title 18, United States Code, Section 1591(e)(3).

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

**COUNT 3 – COERCION AND ENTICEMENT OF AN INDIVIDUAL TO TRAVEL TO ENGAGE IN PROSTITUTION**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations of Sections A and C of Count 1 are hereby realleged and incorporated herein in their entirety.

**B. THE OFFENSE:**

Beginning at a time unknown, but not later than June 17, 2013, and continuing until on or about July 10, 2013, in the Eastern District of Louisiana and elsewhere, the defendant, **TAUREAN OKEITH JACKSON (a/k/a “Marvelous Rich,” a/k/a “Richard Jones,” a/k/a**

“**Richard Marvelously**”), knowingly persuaded, induced, enticed, and coerced, **Minor Victim 1** to travel in interstate commerce, that is, from Texas to Louisiana, to engage in prostitution and in sexual activity for which a person can be charged with a criminal offense, to wit: LA Rev. Stat. 14:80, LA Rev. Stat. 14:81.3, and LA Rev. Stat. 14:82.1, and aided and abetted such conduct.

All in violation of Title 18, United States Code, Sections 2422(a) and 2.

**COUNT 4 – INTERSTATE TRANSPORTATION OF A MINOR FOR PURPOSE OF  
ENGAGING IN CRIMINAL SEXUAL ACTIVITY**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations of Sections A and C of Count 1 are hereby realleged and incorporated herein in their entirety.

**B. THE OFFENSE:**

Beginning at a time unknown, but not later than July 6, 2013, and continuing until on or about July 10, 2013, in the Eastern District of Louisiana and elsewhere, **TAUREAN OKEITH JACKSON (a/k/a “Marvelous Rich,” a/k/a “Richard Jones,” a/k/a “Richard Marvelously”)**, did knowingly transport an individual, that is, **Minor Victim 1**, a minor under the age of 18, in interstate commerce, from Texas to Louisiana, with the intent that **Minor Victim 1** engage in sexual activity for which a person can be charged with a criminal offense, to wit: LA Rev. Stat. 14:80, LA Rev. Stat. 14:81.3, and LA Rev. Stat. 14:82.1.

All in violation of Title 18, United States Code, Sections 2423(a) and 2.

**COUNT 5 – OBSTRUCTION AND ATTEMPTED OBSTRUCTION OF  
ENFORCEMENT OF 18 U.S.C. § 1591**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. The allegations of Sections A and C of Count 1 are hereby realleged and incorporated herein in their entirety.

2. Beginning at a time unknown, but not earlier than July 15, 2013, and continuing through on or about July 26, 2013, while aware of a pending investigation into his role in the conduct described above, the defendant, **TAUREAN OKEITH JACKSON (a/k/a “Marvelous Rich,” a/k/a “Richard Jones,” a/k/a “Richard Marvelously”)**, requested and encouraged individuals known and unknown to the Grand Jury, including, but not limited to, immediate family members, to delete certain social media accounts containing information that would inculcate him in the trafficking, and attempted trafficking, of individuals for the purpose of engaging in prostitution.

3. On or about July 23, 2013, **JACKSON** also directed certain immediate family members to destroy a computer believed to contain records and materials related to the activities described above.

4. **JACKSON** also instructed individuals known and unknown to the Grand Jury to create a false alibi for him, namely that he did not know **Minor Victim 1** and was not present in the New Orleans area with **BIRDOW** and **Minor Victim 1** between July 7, 2013, and July 10, 2013.

**B. THE OFFENSE:**

Beginning at a time unknown, but not later than July 15, 2013, and continuing until not earlier than July 26, 2013, in the Eastern District of Louisiana and elsewhere, the defendant, **TAUREAN OKEITH JACKSON (a/k/a “Marvelous Rich,” a/k/a “Richard Jones,” a/k/a “Richard Marvelously”)**, obstructed, interfered with, and prevented the enforcement of, and attempted to obstruct, interfere with, and prevent the enforcement of, Title 18, United States Code, Section 1591.

All in violation of Title 18, United States Code, Section 1591(d).



### NOTICE OF SENTENCE ENHANCEMENT

Now comes the United States of America, by and through the United States Attorney for the Eastern District of Louisiana, Kenneth Allen Polite, Jr., who gives notice that on or about August 24, 2009, the defendant, **TAUREAN OKEITH JACKSON (a/k/a “Marvelous Rich,” a/k/a “Richard Jones,” a/k/a “Richard Marvelously”)** was convicted in the 363<sup>rd</sup> Criminal District Court of Dallas, Texas of Compelling Prostitution of an Individual Under the Age of 18, Texas Penal Code Section 43.05(a)(2), and Sexual Assault of a Child, Texas Penal Code Section 22.011(a)(2), Case Number F-83-1307. Because of this conviction, if the defendant is convicted for a violation of Title 18, United States Code, Section 2422(a) (Count 3) or 2422(b) (Count 4), the defendant’s sentence will be subject to a maximum sentence of imprisonment of not more than forty (40) years as to Count 3 and a mandatory minimum sentence of twenty (20) years and a maximum sentence of life as to Count 4. *See* Title 18, United States Code, Section 2426.

### NOTICE OF FORFEITURE FOR SEX TRAFFICKING OF CHILDREN

1. The allegations of Counts 1 and 2 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 1594(d).

2. As a result of the offenses alleged in Counts 1 and 2, **TAUREAN OKEITH JACKSON (a/k/a “Marvelous Rich,” a/k/a “Richard Jones,” a/k/a “Richard Marvelously”)**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 1594(d), any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the

violations alleged in Count 1 and 2 of this Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, 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 Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 1594(d).

**NOTICE OF FOREFEITURE FOR COERCION AND ENTICEMENT**

1. The allegations of Counts 3 and 4 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 2428.

2. As a result of the offenses alleged in Counts 3 and 4, **TAUREAN OKEITH JACKSON (a/k/a “Marvelous Rich,” a/k/a “Richard Jones,” a/k/a “Richard Marvelously”)**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2428, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations and any and all property used or

intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts 3 and 4 of this Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, 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 Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 2428.

A TRUE BILL:

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FOREPERSON

KENNETH ALLEN POLITE, JR.  
United States Attorney

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JORDAN GINSBERG  
Assistant United States Attorney  
Illinois Bar No. 6282956

New Orleans, Louisiana  
December 13, 2013