

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,)
)
) Plaintiff)
)
) v.)
)
 EDWARD BAGLEY, (01))
 a/k/a "Master Ed")
 [DOB: 04/16/1967])
)
 BRADLEY COOK, (02))
 a/k/a "PutHer2GoodUse")
 [DOB: 09/24/1978])
)
 MICHAEL STOKES, (04))
 a/k/a "The Rodent")
 [DOB: 05/28/1948])
)
 and)
)
 MARILYN BAGLEY, (06))
 [DOB: 07/04/1965])
)
)
 _____ Defendants.)

No. 10-00244-01/02/04/06-CR-W-DW

COUNT ONE:

18 U.S.C. § 371

Conspiracy

ALL DEFENDANTS

[NMT: Five Years Imprisonment,
\$250,000 Fine, Three Years Supervised
Release]

Class D Felony

COUNT TWO:

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

Sex Trafficking by Force, Fraud or Coercion

ALL DEFENDANTS

[NLT: Fifteen Years Imprisonment, Five Years
Supervised Release,

NMT: Life Imprisonment, \$250,000 Fine,
Life Supervised Release]

Class A Felony

COUNT THREE:

18 U.S.C. §§ 1589, 1594, and 2

Forced Labor Trafficking

DEFENDANTS E. BAGLEY and M. BAGLEY

[NMT: Life Imprisonment, \$250,000 Fine,
Five Years Supervised Release]

Class A Felony

COUNT FOUR:

18 U.S.C. § 2422(b)

Use of an Interstate Facility for Enticement

DEFENDANT E. BAGLEY

[NLT: Ten Years Imprisonment,
NMT: Life Imprisonment, \$250,000 Fine,
Any Term of Years or Life Supervised
Release]

Class A Felony

COUNT FIVE:

18 U.S.C. §§ 1592 and 2

Document Servitude

DEFENDANT E. BAGLEY and M. BAGLEY

[NMT: Five Years Imprisonment, \$250,000

Fine, Three Years Supervised Release]

Class D Felony

COUNT SIX:

18 U.S.C. § 2422(a)

Enticement to Travel for Sexual Activity

DEFENDANT E. BAGLEY

[NMT: Twenty Years Imprisonment,

\$250,000 Fine, Three Years Supervised

Release]

Class C Felony

COUNT SEVEN:

18 U.S.C. § 2421

Transportation for Sexual Activity

DEFENDANT E. BAGLEY

[NMT: Ten Years Imprisonment,

\$250,000 Fine, Three Years Supervised

Release]

Class C Felony

COUNT EIGHT:

18 U.S.C. §§ 924(c)(1)(A) and (iii)

**Possession of a Firearm in Furtherance of a
Crime of Violence**

DEFENDANT E. BAGLEY

[NLT: Ten Years Imprisonment (Consecutive),

NMT: Life Imprisonment, \$250,000 Fine, Five

Years Supervised Release]

Class A Felony

COUNT NINE:

21 U.S.C. §§ 846, 859(a) and 841(b)(1)(D)

Conspiracy to Distribute a Controlled Substance to a Person Under 21-Years Old

DEFENDANT E. BAGLEY

[NLT: One Year Imprisonment,

NMT: Five Years Imprisonment, \$250,000

Fine, NLT: Two Years Supervised Release]

Class D Felony

COUNT TEN:

18 U.S.C. § 922(g)(3)

Drug User in Possession of a Firearm

DEFENDANT E. BAGLEY

[NMT: Ten Years Imprisonment,

\$250,000 Fine, Three Years Supervised

Release]

Class C Felony

COUNT ELEVEN:

18 U.S.C. § 2252(a)(2)

Receipt of Child Pornography

DEFENDANT STOKES

[NLT: Five Years Imprisonment,

NMT: Twenty Years Imprisonment, \$250,000

Fine, Any Term of Years or Life Supervised

Release]

Class C Felony

COUNT TWELVE:

18 U.S.C. § 2252(a)(4)(B)

Possession of Child Pornography

DEFENDANT STOKES

[NMT: Ten Years Imprisonment, \$250,000

Fine, Any Term of Years or Life Supervised

Release]

Class C Felony

COUNT THIRTEEN:

18 U.S.C. §§ 1952(a) and 2

Use of an Interstate Facility to Facilitate Unlawful Activity

ALL DEFENDANTS

[NMT: Five Years Imprisonment,
\$250,000 Fine, Three Years Supervised
Release]

Class D Felony

COUNT FOURTEEN:

18 U.S.C. § 1512(a)(1)(A)

Attempted Tampering with a Victim

DEFENDANT COOK

[NMT: Thirty Years Imprisonment, \$250,000
Fine, Five Years Supervised Release]

Class B Felony

COUNTS FIFTEEN - SIXTEEN:

18 U.S.C. §§ 1958 and 2

Use of Interstate Facility in Commission of Murder for Hire

DEFENDANT COOK

[NMT: Ten Years Imprisonment, \$250,000
Fine, Five Years Supervised Release]

Class C Felony

COUNT SEVENTEEN:

18 U.S.C. §§ 1513(a)(1) and 2

Attempted Witness Retaliation

DEFENDANT COOK

[NMT: Thirty Years Imprisonment, \$250,000
Fine, Five Years Supervised Release]

Class B Felony

COUNT EIGHTEEN:

18 U.S.C. §§ 1512(b)(1) and 2

Attempted Tampering with a Witness

DEFENDANT COOK

[NMT: Twenty Years Imprisonment, \$250,000
Fine, Five Years Supervised Release]

Class C Felony

ALLEGATION OF FORFEITURE

\$100 Special Assessment on Each Count
Order of Restitution

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Conspiracy)

A. Introduction

At all times relevant to this Indictment:

1. Defendants **EDWARD BAGLEY**, a/k/a “Master Ed,” **MICHAEL STOKES**, a/k/a “The Rodent,” and **MARILYN BAGLEY**, and Dennis Henry and James Noel were residents of the Western District of Missouri. Defendant **BRADLEY COOK**, a/k/a “PutHer2GoodUse,” was a resident of the Eastern District of Missouri.

2. Unless otherwise specified herein, Defendants **EDWARD BAGLEY**, a/k/a “Master Ed,” **BRADLEY COOK**, a/k/a “PutHerToGoodUse,” **MICHAEL STOKES**, a/k/a “The Rodent,” and **MARILYN BAGLEY**, and Dennis Henry and James Noel engaged in the alleged conduct herein in the Western District of Missouri.

3. A female born in February 1986, was the victim of the crimes alleged herein. Female Victim, hereafter “FV,” was a resident of the Western District of Missouri.

B. Object of the Conspiracy

Between on or about December 2002, to and including February 27, 2009, within the Western District of Missouri, and elsewhere, Defendants **EDWARD BAGLEY**, **BRADLEY COOK**, **MICHAEL STOKES**, and **MARILYN BAGLEY**, and Dennis Henry and

James Noel, and others known and unknown to the Grand Jury, conspired and agreed with each other to:

(a) recruit, entice, harbor, transport, provide, and obtain FV and benefitted financially and by receiving something of value from participation in a venture which engaged in an act of recruiting, enticing, harboring, transporting, providing, and obtaining FV, knowing that force, fraud, and coercion, and any combination of such means, would be used to cause FV to engage in a commercial sex act; and did so in and affecting interstate commerce; all in violation of Title 18, United State Code, Sections 1591(a) and (b)(1);

(b) use a facility of interstate commerce to promote, establish, carry on, and facilitate the promotion, establishment, and carrying on, of unlawful activity; all in violation of Title 18, United States Code, Section 1952(a)(3).

C. Manner and Means By Which the Object of the Conspiracy was to be Accomplished

The object of the conspiracy was to be accomplished, in substance, as follows:

1. Defendants **EDWARD BAGLEY** and **MARILYN BAGLEY** recruited and enticed a minor female, FV, who they believed suffered from mental deficiencies and came from a troubled childhood, into their trailer home in a wooded area within the Western District of Missouri.

2. Defendants **EDWARD BAGLEY** and **MARILYN BAGLEY** engaged in sexual intercourse and sexual torture activities with FV to groom and coerce her to become a “sex slave.”

3. Defendant **EDWARD BAGLEY** beat, whipped, flogged, suffocated, choked, electrocuted, caned, skewered, drowned, mutilated, hung, and caged FV to groom and coerce her to become a “sex slave.”

4. Defendant **EDWARD BAGLEY** advertised and publicized FV over the internet and in live web cam sessions as his slave who would engage in sexual acts and could be tortured during live online sessions, or in person.

5. Defendants **BRADLEY COOK** and **MICHAEL STOKES**, and Dennis Henry and James Noel communicated with Defendant **EDWARD BAGLEY** on the internet and the telephone regarding **BAGLEY’s** use of FV and the sexual acts he could have her perform for them as his slave.

6. Defendants **BRADLEY COOK**, **MICHAEL STOKES** and Dennis Henry and James Noel provided Defendant **EDWARD BAGLEY** with benefits and things of value including, but not limited to, cash, cigarettes, computer hard drives, sadomasochism videos, coats, and meat.

7. Defendant **EDWARD BAGLEY** accepted the benefits and things of value and coerced FV to engage in sexual acts and torture sessions with Defendants **BRADLEY COOK**, **MICHAEL STOKES**, and Dennis Henry and James Noel.

8. Defendants **BRADLEY COOK** and **MICHAEL STOKES**, and Dennis Henry and James Noel engaged in sexual acts with FV, including sexual torture, including, but not limited to, flogging, whipping, shocking, choking, piercing, skewering, sewing, stapling, and electrocuting.

D. Overt Acts

In furtherance of the conspiracy and to accomplish the object of the conspiracy, Defendants **EDWARD BAGLEY, BRADLEY COOK, MICHAEL STOKES, MARILYN BAGLEY**, and Dennis Henry and James Noel, and others known and unknown to the Grand Jury, committed various overt acts within the Western District of Missouri and elsewhere, including, but not limited to the following:

1. In or about December 2002, Defendants **EDWARD BAGLEY** and **MARILYN BAGLEY** invited FV, a 16-year-old minor, who grew up in foster care homes, into their residence after she ran away from home and promised her “a great life,” including but not limited to, making her a model and a dancer, and making her “dreams come true.”

2. In or about February 2003, Defendants **EDWARD BAGLEY** and **MARILYN BAGLEY** gave FV her own bedroom, dresser, and television, and provided her with clothes and food to entice her to stay in their trailer home.

3. Between on or about December 2002, to and including December 6, 2004, Defendant **MARILYN BAGLEY** modeled “slave clothes” as a part of recruiting FV to become Defendant **EDWARD BAGLEY**’s slave.

4. Between on or about December 2002, to and including February 27, 2009, Defendants **EDWARD BAGLEY** and **MARILYN BAGLEY** used the internet and adult BDSM pornography to train and groom FV to become a sex slave.

5. Between on or about December 2002, to and including February 2004, Defendant **EDWARD BAGLEY** had sexual intercourse with FV while she was still a minor.

6. Between on or about December 2002, to and including February 2004, Defendants **EDWARD BAGLEY** and **MARILYN BAGLEY** showed FV, while she was still a minor, images of pornography and sadomasochism activities on the internet, his computer, and television.

7. On or about February 10, 2004, Defendant **EDWARD BAGLEY** had FV sign a “sex slavery contract” and related home-made documents, shortly after her 18th birthday and instructed FV that the contract legally bound her to him as his “sex slave,” with a term that “never” ended.

8. Between on or about February 10, 2004, to and including December 27, 2005, Defendant **EDWARD BAGLEY** sewed FV’s urinary opening and vagina shut to show her what was “expected of her.”

9. Between on or about February 10, 2004, to and including February 2005, Defendant **EDWARD BAGLEY** had FV tattooed to mark her as his property, which included a tattoo of:

(1) a bar code on FV’s neck; (2) a tribal tattoo on her back with the letter “S” to mark her as a slave; and (3) the Chinese symbol for slave on her ankle.

10. Between on or about December 2002, to and including February 27, 2009, Defendant **EDWARD BAGLEY** gave FV marijuana and ecstasy, Schedule I controlled substances.

11. Between on or about February 2004, to and including February 27, 2009, Defendant **EDWARD BAGLEY** engaged in oral, vaginal, and anal sex with FV.

12. On or before August 19, 2004, Defendant **MARILYN BAGLEY** posed in photographs taken by Defendant **EDWARD BAGLEY** where she sexually tortured FV, including, but not limited to, full vaginal penetration with her fist.

13. On or before June 6, 2005, Defendants **EDWARD BAGLEY** and **MARILYN BAGLEY** sent a text message on the internet stating he “whored out” FV.

14. On or about December 9, 2006, FV called Defendant **MARILYN BAGLEY** from California and told Marilyn Bagley that she was afraid of Ed Bagley using the crank phone on her for the photo shoot. Defendant **MARILYN BAGLEY** indicated to FV she did not have a choice and not to upset Defendant **EDWARD BAGLEY**.

15. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **EDWARD BAGLEY** performed the following sexual acts, mutilation, and torture, any one of which constitute an overt act, including, but not limited to, the following:

a. Defendant **EDWARD BAGLEY** sewed FV’s vaginal opening with a needle and thread.

b. Defendant **EDWARD BAGLEY** skewered through FV’s flesh on her pubic region, pierced FV’s vaginal opening and tacked open her labia.

c. Defendant **EDWARD BAGLEY** punctured through FV’s nipples with multiple metal needles.

d. Defendant **EDWARD BAGLEY** hooded, roped down, and pierced through FV’s nipples with hooks and stretched her breasts into the air.

e. Defendant **EDWARD BAGLEY** whipped FV’s body, breasts, genitalia, and anus with paddles, canes, and floggers.

- f. Defendant **EDWARD BAGLEY** tied up FV's breasts, cutting off blood flow and circulation to escalate sensitivity, and slapped her breasts with metal devices.
- g. Defendant **EDWARD BAGLEY** tied up FV's breasts, cutting off blood flow and circulation to escalate sensitivity, and pierced her breasts with needles.
- h. Defendant **EDWARD BAGLEY** tied FV down, duct taped her mouth, and cut through her breast with a long metal skewer.
- i. Defendant **EDWARD BAGLEY** gagged FV and tied her body and neck up with rope, cutting off oxygen.
- j. Defendant **EDWARD BAGLEY** tied FV's limbs behind her body and left her hanging, suspended in the air, or on a bench for long period's of time.
- k. Defendant **EDWARD BAGLEY** gagged FV, tied her limbs stretched open, and suctioned her breasts and vaginal labia with suction devices.
- l. Defendant **EDWARD BAGLEY** chained FV's body down or to the wall and blindfolded and hooded her.
- m. Defendant **EDWARD BAGLEY** gagged and blindfolded FV naked, chained up FV, and stretched her limbs in opposing directions.
- n. Defendant **EDWARD BAGLEY** gagged FV, tied her hands behind her back, and nailed FV's nipples to slabs of wood.
- o. Defendant **EDWARD BAGLEY** bound and tied FV naked to a wooden pony or wooden horse with an appendage inserted into her vaginal or anal opening.

p. Defendant **EDWARD BAGLEY** strapped FV down for hours at a time on a home-made device consisting of a plastic toolbox with a motor and piston inside connected to a metal arm with a dildo attached.

q. Defendant **EDWARD BAGLEY** locked, chained and hooded FV naked in a dog cage, often suspending the cage in the air or attaching FV's sex organs to electrical devices while she was trapped in the cage.

r. Defendant **EDWARD BAGLEY** electrocuted FV with crank phones by generating high levels of electric voltage into FV through her toes, labia, nipples, vagina, and anus.

s. Defendant **EDWARD BAGLEY** inserted a catheter into FV's urethra and clamped the cord to prevent urination for extended periods of time.

t. Defendant **EDWARD BAGLEY** inserted a plug into FV's anus which he used to electrocute her and force water into her rectum.

u. Defendant **EDWARD BAGLEY** performed "waterboarding" on FV by forcing her head underwater or pouring water on her face for extended periods of time.

v. Defendant **EDWARD BAGLEY** suffocated FV to unconsciousness with ropes and plastic bags.

16. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **EDWARD BAGLEY** escalated, increased, and extended the torture outlined in Paragraphs 15(a) - (v) above, that he executed upon FV as a form of punishment if FV attempted to stop the activity, cried for help, or did not otherwise cooperate during the course of the torture.

17. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **EDWARD BAGLEY** refused FV necessary medical care and provided FV animal antibiotics for infections and illness.

18. Between on or about January 2004, to and including June 2007, Defendant **MARILYN BAGLEY** warned FV to “do as she was told” or should would see “Violent Ed.”

19. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **MARILYN BAGLEY** refused to offer FV assistance when FV expressed fear of Defendant **EDWARD BAGLEY**.

20. Between on or about February 2003, to and including February 27, 2009, Defendants **EDWARD BAGLEY** and **MARILYN BAGLEY** took and held FV’s government identification documents, including, but not limited to, FV’s birth certificate and social security card.

21. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **EDWARD BAGLEY** tortured FV on live web cam over the internet.

22. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **EDWARD BAGLEY** threatened and exhibited his ability to kill FV by maintaining numerous guns in the home.

23. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **EDWARD BAGLEY** threatened and exhibited his ability to kill FV by shooting animals she cared for in front of her, and bragging about the bodies he had already buried in the woods behind the trailer home.

24. On or about February 8, 2009, Defendant **EDWARD BAGLEY**, while intoxicated, transported FV from a strip club with a loaded firearm in his vehicle.

25. Between on or about October 2008, to and including February 27, 2009, Defendant **EDWARD BAGLEY** threatened to bury FV alive and showed her a video demonstrating how he intended to do it.

26. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **EDWARD BAGLEY** ignored FV's pleas to stop abusing her, would not allow her to use a "safe word," or ignored her "safe word" when she attempted to use it during the sex/torture sessions that he performed with her alone, and those witnessed in and participated in by Defendants **MICHAEL STOKES** and **BRADLEY COOK** and Dennis Henry and James Noel.

27. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **EDWARD BAGLEY** performed "abortions" on FV using specula, vacuums, and clothing hangers for the purpose of terminating possible pregnancies.

28. Between on or about February 10, 2004, to and including February 27, 2009, Defendants **MICHAEL STOKES** and **BRADLEY COOK** and Dennis Henry and James Noel communicated with Defendant **EDWARD BAGLEY** on the internet and/or the telephone regarding sexual and torture activities involving FV.

29. In or about 2004, Defendant **EDWARD BAGLEY** invited Dennis Henry to his trailer residence and presented FV to Dennis Henry as his slave.

30. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **EDWARD BAGLEY** provided FV to Dennis Henry to allow Dennis Henry to torture

her, including but not limited to, allowing him to tie FV up, strap her to a wooden pony, and whip her with floggers and leather straps.

31. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **EDWARD BAGLEY**, after torturing FV, would have her clean up the mess and clean the sexual toys and devices used on her because that was “her responsibility” as a slave.

32. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **EDWARD BAGLEY** provided FV to Dennis Henry to have him engage in oral and vaginal sex with her.

33. Between on or about March 2007, to and including February 27, 2009, Defendant **EDWARD BAGLEY** provided FV to Dennis Henry for him to have anal sex with FV so he could “get her used to” having anal sex with other men.

34. In or about December 2006, Defendant **EDWARD BAGLEY** and Dennis Henry transported FV from Missouri to California with the intent that FV perform sexual acts during a photo shoot.

35. In or about December 2006, Defendant **EDWARD BAGLEY** accepted approximately \$1,400 from Dennis Henry for FV to engage in sex acts during a pornographic photo shoot in California.

36. In or about March 2007, Defendant **EDWARD BAGLEY** accepted an additional \$500 from Defendant Dennis Henry for further transportation of FV from Missouri to California.

37. Between on or about, February 10, 2004, to and including October 2008, Defendant **BRADLEY COOK** watched Defendant **EDWARD BAGLEY** stream live video over

the internet of FV being sexually abused and tortured, including, but not limited to, being whipped through the bars of a cage.

38. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **BRADLEY COOK** downloaded pictures of FV distributed by Defendant **EDWARD BAGLEY** to his computer and saved them.

39. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **BRADLEY COOK** sent images to Defendant **EDWARD BAGLEY** of females in his residence that he beat, bound and tied up to share ideas with Defendant **BAGLEY** of how to abuse FV.

40. Between on or about January 2006, to and including, October 2008, Defendant **BRADLEY COOK** visited Defendant **EDWARD BAGLEY's** residence and smoked marijuana with Defendant **EDWARD BAGLEY** and FV.

41. Between on or about January 2006, to and including, October 2008, Defendant **BRADLEY COOK** traveled to Defendant **EDWARD BAGLEY's** residence and observed Defendant **BAGLEY** have FV perform sexual acts for Defendant **COOK**.

42. Between on or about January 2006, to and including, October 2008, Defendant **BRADLEY COOK** traveled to Defendant **EDWARD BAGLEY's** residence and had FV perform oral sex on him.

43. Between on or about January 2006, to and including October 2008, Defendant **BRADLEY COOK** engaged in vaginal, anal, and oral sex with FV.

44. Between on or about January 2006, to and including October 2008, Defendant **BRADLEY COOK** gave Defendant **EDWARD BAGLEY** a hard drive with sadomasochism

and torture videos downloaded from the internet, including videos showing how to bury someone alive.

45. Between on or about January 2006, to and including October 2008, Defendant **EDWARD BAGLEY** whipped FV for Defendant **BRADLEY COOK** while FV was chained up.

46. Between on or about January 2006, to and including October 2008, Defendant **BRADLEY COOK**, sexually abused females in his own residence and shared those torture methods with Defendant **EDWARD BAGLEY** for him to apply to FV. Any one of which constitutes an overt act, including, but not limited to the following:

- a. tied up FV's breasts with rope, cutting off her blood flow, and then slapped the sensitized area with a paddle or his hand;
- b. tied up FV and then applied wooden spring clothes pins to her body;
- c. tied up FV and placed a ball gag and rings in her mouth;
- d. tied up FV naked, laying down, and poured water on her face to "waterboard" her.

47. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **MICHAEL STOKES** traveled to Defendant **EDWARD BAGLEY**'s residence and engaged in the following acts, any one of which constitutes an overt act, including, but not limited to the following:

- a. flogged and whipped FV's body;
- b. shocked FV's vaginal opening with an electrical device;
- c. tortured FV with a sensory deprivation device;
- d. watched Defendant **EDWARD BAGLEY** torture FV with a crank phone;

e. watched Defendant **EDWARD BAGLEY** electrocute FV while she was confined in a dog cage.

48. Between on or about June 2006, to and including February 27, 2008, Defendant **MICHAEL STOKES** engaged in oral and vaginal sex with FV.

49. On or about 2006, Defendant **MICHAEL STOKES** offered FV to James Noel and another known person to the Grand Jury for sex acts and transported James Noel to Defendant **EDWARD BAGLEY**'s residence.

50. In or about December 2006, Defendant **MICHAEL STOKES** gave Defendant **EDWARD BAGLEY** \$1,000 to transport FV to California for a pornographic photo shoot where FV would engage in sex acts.

51. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **MICHAEL STOKES** gave Defendant **EDWARD BAGLEY** steaks, cigarettes, coats, clothing, lighters, and cash.

52. In or about March 2005, Defendant **MICHAEL STOKES** gave Defendant **EDWARD BAGLEY** \$300 to build a home-made device to torture FV, which was made up of a black plastic toolbox with a motor and piston inside connected to a metal arm with a dildo attached.

53. Between on or about 2006, to and including February 27, 2009, Defendant **EDWARD BAGLEY** hooked FV to an electrical device that was connected to a dildo for Defendant **MICHAEL STOKES** and James Noel's to watch.

54. Between on or about 2006, to and including February 27, 2009, Defendant **EDWARD BAGLEY** tortured FV for James Noel with a crank phone, electrical devices, a violet wand and floggers.

55. Between on or about December 2006, to and including March 2007, Defendant **EDWARD BAGLEY** accepted \$300 from James Noel to watch and engage in torture activities with FV for several hours.

56. Between on or about February 10, 2004, to and including February 27, 2009, Defendant **MARILYN BAGLEY** accepted and utilized the benefits received from FV's sexual acts and dancing at the local adult entertainment clubs for herself, including, but not limited to, cigarettes, steaks, clothes, food, and cash.

57. Between on or about June 2007, to and including February 27, 2009, Defendant **EDWARD BAGLEY** had FV work at an adult entertainment club as a dancer and stripper for his own financial benefit.

58. On or about February 27, 2009, Defendant **EDWARD BAGLEY** suffocated and electrocuted FV during a torture session, which resulted in her cardiac arrest, emergency medical treatment, and hospitalization.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

(Sex Trafficking by Force, Fraud or Coercion)

The Grand Jury hereby incorporates by reference, and alleges herein, the factual allegations in paragraphs A through D of Count One of this indictment.

Between on or about February 10, 2004, continuing through on or about February 27, 2009, in the Western District of Missouri and elsewhere, **EDWARD BAGLEY, BRADLEY COOK, MICHAEL STOKES, and MARILYN BAGLEY**, defendants herein, aiding and abetting one another and others, knowingly, in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, and obtained by any means, a person, namely FV, and benefitted financially and by receiving something of value from participation in a venture engaged in recruiting, enticing, harboring, transporting, providing, and obtaining FV, knowing that force, fraud, and coercion would be used to cause FV to engage in a commercial sex act; and attempted to do so.

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

COUNT THREE

(Forced Labor Trafficking)

The Grand Jury hereby incorporates by reference, and alleges herein, the factual allegations in paragraphs A through D of Count One of this indictment.

Between on or about June 2007, continuing through on or about February 27, 2009, in the Western District of Missouri and elsewhere, **EDWARD BAGLEY and MARILYN BAGLEY**, defendants herein, aiding and abetting one another and others, knowingly provided and obtained the labor and services, to wit: stripping and exotic dancing at adult entertainment clubs, of a person, namely FV, by the means of: (1) threats of serious harm to or physical

restraint against FV; (2) by means of a scheme, plan, and pattern intended to cause FV to believe that, if she did not perform such labor and services, that she would suffer serious harm and physical restraint, and said acts involved aggravated sexual abuse; and attempted to do so.

All in violation of Title 18, United States Code, Sections 1589, 1594 and 2.

COUNT FOUR

(Use of an Interstate Facility for Enticement)

The Grand Jury hereby incorporates by reference, and alleges herein, the factual allegations in paragraphs A through D of Count One of this indictment.

Between on or about May 2002, continuing through on or about February 2004, in the Western District of Missouri and elsewhere, **EDWARD BAGLEY**, defendant herein, knowingly used a facility and means of interstate commerce, the internet, to persuade, induce, entice, and coerce an individual, namely FV, who had not attained the age of 18 years, to engage in prostitution and any sexual activity for which any person could be charged with a criminal offense; to wit: statutory sodomy in the second degree in violation of Mo. St. 566.064, and statutory rape in the second degree in violation of Mo. St. 566.034.

All in violation of Title 18, United States Code, Section 2422(b).

COUNT FIVE

(Document Servitude)

The Grand Jury hereby incorporates by reference, and alleges herein, the factual allegations in paragraphs A through D of Count One of this indictment.

Between on or about February 2004, continuing through on or about February 27, 2009, all dates being approximate and inclusive, in the Western District of Missouri and elsewhere, **EDWARD BAGLEY** and **MARILYN BAGLEY**, defendants herein, aiding and abetting one

another and others, knowingly concealed, removed, confiscated, and possessed actual and purported Government identification documents, including FV's state issued identification card, birth certificate, and social security card, in the course of violations of 18 U.S.C. §§ 1591 and 1589, and with the intent to violation 18 U.S.C. §§ 1591 and 1589.

All in violation of Title 18, United States Code, Section 1592 and 2.

COUNT SIX
(Enticement to Travel for Sexual Activity)

The Grand Jury for the Western District of Missouri further charges that the Grand Jury hereby incorporates by reference, and alleges herein, the factual allegations in paragraphs A through D of Count One of this indictment.

Between on or about May 2006, continuing through on or about March 2007, in the Western District of Missouri and elsewhere, **EDWARD BAGLEY**, defendant herein, knowingly persuaded, induced, enticed, and coerced an individual, namely FV, to travel in interstate and foreign commerce, to engage in prostitution and any sexual activity for which a person could be charged with a criminal offense, to wit: unlawful sexual conduct procured by fear in violation of Cal. Penal Code § 266c, pandering in violation of Cal. Penal Code § 266(i), prostitution in violation of Cal. Penal Code § 647(b), conspiracy to commit sex trafficking in violation of 18 U.S.C. § 371, as alleged in Count One of this indictment, and sex trafficking in violation of 18 U.S.C. § 1591, as alleged in Count Two of this indictment; and attempted to do so.

All in violation of Title 18, United States Code, Section 2422(a).

COUNT SEVEN
(Transportation for Sexual Activity)

The Grand Jury hereby incorporates by reference, and alleges herein, the factual allegations in paragraphs A through D of Count One of this indictment.

Between on or about December 2006, continuing through on or about March 2007, in the Western District of Missouri and elsewhere, **EDWARD BAGLEY**, defendant herein, knowingly transported an individual, namely FV, in interstate commerce, with the intent that FV engage in prostitution and any sexual activity for which any person can be charged with a criminal offense, to wit: prostitution in violation of Cal. Penal Code § 647(b), pandering in violation of Cal. Penal Code § 266(i), conspiracy to commit sex trafficking in violation of 18 U.S.C. § 371, as alleged in Count One of this indictment, and sex trafficking in violation of 18 U.S.C. § 1591, as alleged in Count Two of this indictment; and attempted to do so.

All in violation of Title 18, United States Code, Section 2421.

COUNT EIGHT
(Possession of a Firearm in Furtherance of a Crime of Violence)

The Grand Jury hereby incorporates by reference, and alleges herein, the factual allegations in paragraphs A through D of this indictment.

Between on or about December 2002, continuing through on or about February 27, 2009, in the Western District of Missouri and elsewhere, **EDWARD BAGLEY**, defendant herein knowingly possessed a firearm in furtherance of, and used and carried a firearm during and in relation to, a crime of violence for which he may be prosecuted in a court of the United States, that is, conspiracy to commit sex trafficking in violation of 18 U.S.C. § 371, as alleged in Count One of this Indictment, and sex trafficking in violation 18 U.S.C. § 1591, as alleged in Count

Two of the Indictment, and forced labor trafficking in violation of § 1589, as alleged in Count Three of this Indictment; and attempted to do so.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A) and (iii).

COUNT NINE

(Conspiracy to Distribute a Controlled Substance to a Person Under 21-Years Old)

The Grand Jury hereby incorporates by reference, and alleges herein, the factual allegations in paragraphs A through D of Count One of this indictment.

Between on or about September 2002, continuing through on or about February 2007, in the Western District of Missouri and elsewhere, **EDWARD BAGLEY**, defendant herein, knowingly and intentionally combined, conspired, confederated, and agreed with others both known and unknown to the grand jury to distribute marijuana, a Schedule I controlled substance, to FV, a person under twenty-one years of age; and did so while being over the age of eighteen years of age.

All in violation of Title 21, United States Code, Sections 846, 859(a), and 841(b)(1)(D).

COUNT TEN

(Drug User in Possession of a Firearm)

On or about, June 18, 2009, in the Western District of Missouri and elsewhere, **EDWARD BAGLEY**, defendant herein, knowingly possessed a firearm and ammunition, to wit: North American Arms, .22 caliber revolver, SN: R16315; Ruger, Model Single Six, .22 caliber revolver, SN: 264-98461; Sig Sauer, Model Mosquito, .22 caliber pistol, SN: F003666; HS Products, Model XD45, .45 caliber pistol, SN: US735825; Colt, Model Commander, .45 caliber pistol, SN: 70SC2842; CBC, 12 gauge caliber shotgun, SN: 1283530; Ruger, Model 10/22, .22 caliber rifle, SN: 230-58120; Ruger, Model 10/22, .22 caliber rifle, SN: 248-38207; Marlin

Firearms Co., Model 23, .22 caliber rifle, SN: 01237421; Remington Arms Company, Model 742, .22 caliber rifle, SN: B7278888; Winchester, Model 67, .22 caliber rifle, with no serial number; which had been shipped in interstate and foreign commerce, while being an unlawful user of marijuana, a Schedule II controlled substance.

All in violation of Title 18, United States Code, Section 922(g)(3).

COUNT ELEVEN
(Receipt of Child Pornography)

Between on or about December 13, 2004, continuing through on or about August 12, 2010, in the Western District of Missouri and elsewhere, **MICHAEL STOKES**, defendant herein, knowingly attempted to receive visual depictions in interstate commerce by means of computer and the Internet, and the production of the visual depictions involved the use of minors engaged in sexually explicit conduct, and the visual depictions were of such conduct.

All in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(2).

COUNT TWELVE
(Possession of Child Pornography)

Between on or about December 13, 2004, continuing through on or about August 12, 2010, in the Western District of Missouri and elsewhere, **MICHAEL STOKES**, defendant herein, knowingly possessed images which were transported using a facility of interstate and foreign commerce and the production of the said visual depictions involved the use of a minor engaged in sexually explicit conduct and the visual depictions were of such conduct.

All in violation of 18 U.S.C. Section 2252(a)(4)(B).

COUNT THIRTEEN

(Use of an Interstate Facility to Facilitate Unlawful Activity)

The Grand Jury hereby incorporates by reference, and alleges herein, the factual allegations in paragraphs A through D of Count One of this indictment.

Between on or about February 10, 2004, continuing through on or about June 2007, in the Western District of Missouri and elsewhere, **EDWARD BAGLEY, MARILYN BAGLEY, BRADLEY COOK,** and **MICHAEL STOKES,** defendants herein, aiding and abetting one another and others, knowingly used a facility of interstate commerce with the intent to commit a crime of violence to further unlawful activity and otherwise promote, establish, carry on, and facilitate the promotion, establishment and carrying on, of unlawful activity, to wit: prostitution in violation of Mo. St. 567.020, Conspiracy to Commit Sex Trafficking in violation of 18 U.S.C. § 371, as alleged in Count One of this indictment, and Sex Trafficking in violation of 18 U.S.C. § 1591, as alleged in Count Two of this Indictment; and attempted to do so.

All in violation of Title 18, United States Code, Sections 1952(a) and 2.

COUNT FOURTEEN

(Attempted Tampering with a Victim)

Between on or about September 28, 2010, continuing through on or about December 9, 2010, in the Western District of Missouri and elsewhere, **BRADLEY COOK,** defendant herein, knowingly attempted to kill FV, with the intent to prevent FV's attendance and testimony of FV in an official proceeding and prevent the communication by FV to a law enforcement officer and a judge of the United States of information relating to the possible commission of a Federal offense.

All in violation of 18 U.S.C. Section 1512(a)(1).

COUNT FIFTEEN

(Use of Interstate Facility in Commission of Murder for Hire)

On about October 3, 2010, in the Western District of Missouri and elsewhere, **BRADLEY COOK**, defendant herein, knowingly used a facility of interstate and foreign commerce with intent that a murder be committed in violation of the laws of any State and the United States as consideration for the promise and agreement to pay something of pecuniary value.

All in violation of 18 U.S.C. Section 1958.

COUNT SIXTEEN

(Use of Interstate Facility in Commission of Murder for Hire)

On or about October 8, 2010, in the Western District of Missouri and elsewhere, **BRADLEY COOK**, defendant herein, knowingly caused a person to use a facility of interstate and foreign commerce with intent that a murder be committed in violation of the laws of any State and the United States as consideration for the promise and agreement to pay something of pecuniary value.

All in violation of 18 U.S.C. Section 1958.

COUNT SEVENTEEN

(Attempted Witness Retaliation)

Between on or about September 28, 2010, continuing through on or about December 9, 2010, in the Western District of Missouri and elsewhere, **BRADLEY COOK**, defendant herein, knowingly attempted to kill FV with the intent to retaliate against FV for providing to a law enforcement officer information relating to the commission and possible commission of a Federal offense.

All in violation of 18 U.S.C. Section 1513(a)(1)(B).

COUNT EIGHTEEN
(Attempted Tampering with a Witness)

Between on or about September 28, 2010, continuing through on or about March 29, 2011, in the Western District of Missouri and elsewhere, **BRADLEY COOK**, defendant herein, knowingly attempted to use intimidation, threaten, and corruptly persuade and engaged in misleading conduct toward another person, to wit: JP, a female residing in the Eastern District of Missouri, born in May 1986, with the intent to influence, delay, and prevent JP's testimony in an official proceeding, and cause and induce JP to withhold testimony from an official proceeding and evade legal process summoning JP to appear as a witness and hinder, delay, and prevent JP's communication to a law enforcement officer and judge of the United States of information relating to the commission and possible commission of a Federal offense; all in the Western District of Missouri.

All in violation of 18 U.S.C. Section 1512(b).

ALLEGATION OF FORFEITURE

1. The allegations contained in Counts One through Eleven of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 924(d), 982(a)(1), 1589, 1591, 1593(b)(4), 1594(d), 2253, 2422 and 2428, and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 371, 922, 1591, 1589 and 2422(a), set forth in Counts One, Two, Three, Four, Seven, Ten, and Eleven of this Indictment, the Defendants **EDWARD BAGLEY** and **BRADLEY COOK** shall forfeit to the United States of America, pursuant to Title 18, United

States Code, Sections 924(d), 982(a)(1), 1589, 1591, 1593(b)(4), 1594(d), 2253, 2422 and 2428, and Title 28, United States Code, Section 2461(c), any property, real or personal, which was involved in the offenses, or which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, the following:

Personal Property

Computers, hard drives, gaming consoles, and their associated peripheral devices, including a Compaq computer, Serial Number CNX7280M2V, and a Gateway computer, serial number XGM8670001200 (from Ozark Mountain Computers), both recovered from Defendant **EDWARD BAGLEY**; and an Xbox 360, Serial Number 80121281807, an Xbox 360, Serial Number 045056163207, Compaq Presario computer, Serial Number CNC3500355, a Samsung Hard Drive, Serial Number S013J10X102952, a Compaq Presario computer, Serial Number 2CE61403ZR, and an HP Pavilion compute, Serial Number MXK34612HK, all recovered from Defendant **BRADLEY COOK**.

- Sex toys and paraphernalia, including:
- suitcase with piercing items;
 - silver suitcase with electrical wand kit;
 - brown suitcase with violet wand kit;
 - Fukuoka 9000 massager;
 - seven chains;
 - seven "c" clamps;
 - Novapro light and sound machine;
 - Parafin wax warmer;
 - black tool box with dildo motor;
 - tool box with various needles and piercing supplies;
 - one set of handcuffs and one set of leg irons;
 - box with multiple dildos, enemas, and other sexual devices;
 - wires and connectors for electrical devices;
 - gynecological and medical supplies;
 - acupuncture needles;
 - cupping set;

- 35 whips and floggers;
- two black straight jackets;
- bundle of white rope;
- weight belt;
- two wooden spreader bars;
- one wooden pony;
- one wooden horse;
- one black submissive bench.

Firearms recovered from Defendant **EDWARD BAGLEY**, including:

- North American Arms, .22 caliber revolver, SN: R16315;
- Ruger, Model Single Six, .22 caliber revolver, SN: 264-98461;
- Sig Sauer, Model Mosquito, .22 caliber pistol, SN: F003666;
- HS Products, Model XD45, .45 caliber pistol, SN: US735825;
- Colt, Model Commander, .45 caliber pistol, SN: 70SC2842;
- CBC, 12 gauge caliber shotgun, SN: 1283530;
- Ruger, Model 10/22, .22 caliber rifle, SN: 230-58120;
- Ruger, Model 10/22, .22 caliber rifle, SN: 248-38207;
- Marlin Firearms Co., Model 23, .22 caliber rifle, SN: 01237421;
- Remington Arms Company, Model 742, .22 caliber rifle, SN: B7278888;
- Winchester, Model 67, .22 caliber rifle, with no serial number.

United States Currency and Other Property Involved In or Traceable to the Offense

Approximately not less than \$112,200.00 in United States currency, and any interest and proceeds traceable thereto, representing property involved in the charged offenses and the net proceeds obtained by Defendant **EDWARD BAGLEY** in that such sum in aggregate, was involved in the charged offenses, and was involved in, and constitutes or is derived from, proceeds traceable to the offenses set forth in Count Three (Forced Labor Trafficking).

Substitute Assets

If any of the property described above, 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 party;
- 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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), up to the value of the above forfeitable property.

All pursuant to 18 U.S.C. §§ 982(a)(1), 1589, 1591, 1593(b)(4), 1594(d), 2253(a)(2) and (3), 2422(a), 2428, and 28 U.S.C. § 2461(c).

A TRUE BILL.

3/29/11
DATE

/s/ Micheal R. Bailey
FOREPERSON OF GRAND JURY

/s/ Cynthia L. Cordes
Cynthia L. Cordes
Assistant United States Attorney