

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Criminal No. 13-558
	:	
v.	:	18 U.S.C. §§ 1591(a), 1594(c), 2423(a),
	:	2423(e), and 18 U.S.C. § 2
VARIAN CHARLES, a/k/a “Bob”	:	
WILBUR SENAT, a/k/a “Wilby”	:	
SAMUEL VERRIER, a/k/a “Dre”	:	
KARL VENORD, a/k/a “Imme”	:	
	:	

SUPERSEDING INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Trenton, charges:

COUNT 1
(Conspiracy to Engage in Sex Trafficking of Children)

1. At all times relevant to Count 1 of this Superseding Indictment:
 - a. “Victim 1” was a minor female who resided in New York.
 - b. Defendant VARIAN CHARLES, a/k/a “Bob,” resided in Philadelphia, Pennsylvania.
 - c. Defendant WILBUR SENAT, a/k/a “Wilby,” resided in New York.
2. In or about August 2011, in the District of New Jersey, and elsewhere, defendants

VARIAN CHARLES, a/k/a “Bob” and
WILBUR SENAT, a/k/a “Wilby”

did knowingly and intentionally conspire and agree with each other to recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, Victim 1, knowing and in reckless disregard of the fact that Victim 1 had not attained the age of 18 years and that Victim 1 would be caused to engage in a commercial sex act, contrary to Title 18,

United States Code, Section 1591(a).

Object of the Conspiracy

3. The object of the conspiracy was to obtain money and other things of value by recruiting, enticing, harboring, and transporting Victim 1 from New York to Philadelphia, Pennsylvania and forcing her to engage in commercial sex acts, namely prostitution.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that on or about August 11, 2011, defendant SENAT threatened Victim 1 that if she did not agree to leave New York with him, she and her family would be harmed. On or about August 12, 2011, defendant SENAT forced Victim 1 to engage in commercial sex acts, namely prostitution, in New York.

5. It was further part of the conspiracy that on or about August 13, 2011, defendant SENAT arranged for himself and Victim 1 to travel via commercial bus from New York to defendant CHARLES' house in Philadelphia, Pennsylvania, with the intent that Victim 1 would engage in commercial sex acts, namely prostitution, at defendant CHARLES' house in Philadelphia. Defendant SENAT purchased bus tickets for himself and Victim 1 using the names "Mr. Senat" and "Ms. Senat."

6. It was further part of the conspiracy that on or about August 13, 2011, defendant SENAT and Victim 1 traveled from New York to Philadelphia, Pennsylvania via commercial bus. Upon their arrival in Philadelphia, defendant CHARLES met defendant SENAT and Victim 1 at a city bus stop and brought them to defendant CHARLES' house in Philadelphia.

7. It was further part of the conspiracy that shortly after their arrival at defendant CHARLES' house in Philadelphia, defendants SENAT and CHARLES told Victim 1 that Victim

1 would be engaging in commercial sex acts, namely prostitution, at defendant CHARLES' house, that Victim 1 would receive a portion of the money she earned from the commercial sex acts, and that defendants SENAT and CHARLES would keep the remainder of the money.

8. It was further part of the conspiracy that defendants SENAT and CHARLES forced Victim 1 to engage in commercial sex acts, namely prostitution, with various individuals in defendant CHARLES' house in Philadelphia. When Victim 1 resisted, defendants SENAT and CHARLES physically abused Victim 1, including by striking her and chaining her to a pole in the basement of defendant CHARLES' house.

9. It was further part of the conspiracy that defendants SENAT and CHARLES forced Victim 1 to remain at defendant CHARLES' house to engage in commercial sex acts, namely prostitution.

10. It was further part of the conspiracy that defendants SENAT and CHARLES received money and other things of value in exchange for the commercial sex acts performed by Victim 1.

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

COUNT 2
(Sex Trafficking of Children)

1. The allegations contained in paragraphs 1 through 10 of Count 1 are re-alleged and incorporated as if fully set forth herein.

2. On or about August 13, 2011, in the District of New Jersey, and elsewhere,
defendant

WILBUR SENAT, a/k/a “Wilby”

did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, Victim 1, knowing and in reckless disregard of the fact that Victim 1 had not attained the age of 18 years and that Victim 1 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a), and Title 18, United States Code, Section 2.

COUNT 3
(Conspiracy to Transport Minors to Engage in Prostitution)

1. The allegations contained in paragraphs 1 through 10 of Count 1 are re-alleged and incorporated as if fully set forth herein.

2. In or about August 2011, in the District of New Jersey, and elsewhere, defendants

VARIAN CHARLES, a/k/a “Bob” and
WILBUR SENAT, a/k/a “Wilby”

did knowingly and intentionally conspire and agree with each other to transport an individual who had not attained the age of 18 years, namely Victim 1, in interstate commerce, with intent that Victim 1 engage in prostitution, and in any sexual activity for which any person could be charged with a criminal offense, contrary to Title 18, United States Code, Section 2423(a).

In violation of Title 18, United States Code, Section 2423(e).

COUNT 4
(Transportation of Minor to Engage in Prostitution)

1. The allegations contained in paragraphs 1 through 10 of Count 1 are re-alleged and incorporated as if fully set forth herein.

2. On or about August 13, 2011, in the District of New Jersey, and elsewhere,
defendant

WILBUR SENAT, a/k/a “Wilby”

did knowingly and intentionally transport an individual who had not attained the age of 18 years, namely Victim 1, in interstate commerce, with intent that Victim 1 engage in prostitution, and in any sexual activity for which any person could be charged with a criminal offense

In violation of Title 18, United States Code, Section 2423(a), and Title 18, United States Code, Section 2.

COUNT 5

(Conspiracy to Transport a Minor to Engage in Criminal Sexual Activity)

1. The allegations contained in paragraph 1(a) of Count 1 are re-alleged and incorporated as if fully set forth herein.

2. At all times relevant to Count 5 of this Superseding Indictment:

a. Defendant SAMUEL VERRIER, a/k/a “Dre,” resided in Philadelphia, Pennsylvania.

b. Defendant KARL VENORD, a/k/a “Imme,” resided in Philadelphia, Pennsylvania.

3. From in or about August 31, 2011 through in or about September 1, 2011, in the District of New Jersey, and elsewhere, defendants

SAMUEL VERRIER, a/k/a “Dre” and
KARL VENORD, a/k/a “Imme”

did knowingly and intentionally conspire and agree with each other to transport an individual who had not attained the age of 18 years, namely Victim 1, in interstate commerce, with intent that Victim 1 engage in any sexual activity for which any person could be charged with a criminal offense, contrary to Title 18, United States Code, Section 2423(a).

Object of the Conspiracy

4. The object of the conspiracy was to transport Victim 1 from Philadelphia, Pennsylvania to Burlington County, New Jersey to obtain money from “Individual A” through a scheme in which Victim 1 would engage in sexual activity with Individual A and thereafter defendants VERRIER and VENORD would blackmail Individual A for engaging in sexual activity with Victim 1.

Manner and Means of the Conspiracy

5. On or about August 15, 2011, defendant VERRIER engaged in sexual activity with Victim 1 at defendant CHARLES' house in Philadelphia, Pennsylvania. On or about the same date, defendants VERRIER and CHARLES had an argument and thereafter, defendant VERRIER took Victim 1 from defendant CHARLES' house. Defendant VERRIER then coerced Victim 1 to engage in commercial sex acts, namely prostitution, with various individuals in Philadelphia for approximately two weeks. Defendant VERRIER received money in exchange for the commercial sex acts performed by Victim 1.

6. It was part of the conspiracy that on or about August 31, 2011, defendants VERRIER and VENORD met with Victim 1 at a strip club in Philadelphia. Defendants VERRIER and VENORD convinced Victim 1 to accompany them to New Jersey by telling Victim 1 that Victim 1 could visit a family member in New Jersey during the trip. Defendant VENORD allowed Victim 1 to use his cellular phone to call Victim 1's family member in New Jersey.

7. It was further part of the conspiracy that on or about September 1, 2011, defendants VERRIER and VENORD drove Victim 1 from Philadelphia, Pennsylvania to Burlington County, New Jersey with the intent that Victim 1 would engage in sexual activity with Individual A and, thereafter, defendants VERRIER and VENORD would blackmail Individual A for engaging in sexual activity with Victim 1.

8. It was further part of the conspiracy that on or about September 1, 2011, defendants VERRIER and VENORD directed Victim 1 to approach Individual A in a bank parking lot in Burlington County, New Jersey to engage in sexual activity.

All in violation of Title 18, United States Code, Section 2423(e).

COUNT 6

(Transportation of a Minor to Engage in Criminal Sexual Activity)

9. The allegations contained in paragraphs 1 through 8 of Count Five are re-alleged and incorporated as if fully set forth herein.

10. On or about September 1, 2011, in the District of New Jersey and elsewhere, defendants

SAMUEL VERRIER, a/k/a “Dre” and
KARL VENORD, a/k/a “Imme”

did knowingly and intentionally transport an individual who had not attained the age of 18 years, namely Victim 1, in interstate commerce, with intent that Victim 1 engage in any sexual activity for which any person could be charged with a criminal offense.

In violation of Title 18, United States Code, Section 2423(a) and Title 18, United States Code, Section 2.

FIRST FORFEITURE ALLEGATION

1. The allegations contained in all paragraphs of Counts 1 and 2 of this Superseding Indictment are hereby re-alleged and incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 1594(d) and (e).

2. Upon conviction of the offenses alleged in Count 1 and Count 2 of this Superseding Indictment, defendants VARIAN CHARLES, a/k/a “Bob” and WILBUR SENAT, a/k/a “Wilby” shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 1594(d) and (e), any property, real or personal, that was used or intended to be used to commit or facilitate the commission of such violations; and (b) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violations.

3. If any of the above-described forfeitable property, as a result of any act or omission of defendants CHARLES and/or SENAT:

- 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;

then it is the intent of the United States of America to seek forfeiture of any other property of defendants CHARLES and SENAT up to the value of the forfeitable property described above,

pursuant to Title 18, United States Code, Section 1594(d) and (e) and Title 21, United States Code, Section 853(p) as incorporated by Title 18, United States Code, Section 982(b).

In violation of Title 18, United States Code, Sections 982(a)(1) and 1594(d) and (e).

SECOND FORFEITURE ALLEGATION

1. The allegations contained in all paragraphs of Counts 3 through 6 of this Superseding Indictment are hereby re-alleged and incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2428.

2. Upon conviction of the offenses alleged in Counts 3 through 6 of this Superseding Indictment, defendants VARIAN CHARLES, a/k/a “Bob,” WILBUR SENAT, a/k/a “Wilby,” SAMUEL VERRIER, a/k/a “Dre,” and KARL VENORD, a/k/a “Imme” shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428, any property, real or personal, that was used or intended to be used to commit or facilitate the commission of such violations; and (b) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violations.

3. If any of the above-described forfeitable property, as a result of any act or omission of defendants CHARLES, SENAT, VERRIER and/or VENORD:

- 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;

then it is the intent of the United States of America to seek forfeiture of any other property of defendants CHARLES, SENAT, VERRIER and VENORD up to the value of the forfeitable property described above, pursuant to Title 18, United States Code, Section 2428 and Title 21,

United States Code, Section 853(p) as incorporated by Title 18, United States Code, Section 982(b).

In violation of Title 18, United States Code, Sections 982(a)(1) and 2428.

THIRD FORFEITURE ALLEGATION

1. The allegations contained in all paragraphs of this Superseding Indictment are hereby re-alleged and incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. The United States hereby gives notice to defendants VARIAN CHARLES, a/k/a "Bob," WILBUR SENAT, a/k/a "Wilby," SAMUEL VERRIER, a/k/a "Dre," and KARL VENORD, a/k/a "Imme" that, upon conviction of the offenses alleged in this Superseding Indictment, the United States will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violation of Title 18, United States Code, Section 1594, alleged in this Superseding Indictment.

A TRUE BILL

FOREPERSON



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: _____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

**VARIAN CHARLES, a/k/a "Bob"
WILBUR SENAT, a/k/a "Wilby"
SAMUEL VERRIER, a/k/a "Dre"
KARL VENORD, a/k/a "Imme"**

SUPERSEDING INDICTMENT FOR

18 U.S.C. § 1591(a)
18 U.S.C. § 1594(c)
18 U.S.C. § 2423(a)
18 U.S.C. § 2423(e)
18 U.S.C. § 2

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