

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| UNITED STATES OF AMERICA | : | CRIMINAL NO. |
| v. | : | DATE FILED: November 14, 2013 |
| JEREL JACKSON | : | VIOLATIONS: 18 U.S.C. § 1591 |
| a/k/a "JINX" | : | (sex trafficking - 3 counts) |
| | : | 18 U.S.C. § 1594(a) (attempt) |
| | | Notice of forfeiture |

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, defendant JEREL JACKSON, a/k/a "Jinx," was the operator of a prostitution venture in Philadelphia, Pennsylvania and elsewhere.
2. As part of this venture, defendant JEREL JACKSON, a/k/a "Jinx," recruited young females to work as prostitutes in his business. One of the females whom he recruited and who worked for him, Minor 1, whose name is known to the grand jury, was under the age of 18 years.
3. As part of this venture, defendant JEREL JACKSON, a/k/a "Jinx," caused Internet advertisements to be created in which he advertised various females as available for purchase for purposes of prostitution. These advertisements featured pictures of the females, either scantily clad or partially nude, a description of each female, and a phone number to call to arrange a meeting with a female employed by JEREL JACKSON as a prostitute.
4. Defendant JEREL JACKSON, a/k/a "Jinx," used force, threats of force, fraud, and coercion to cause the females who worked for him to engage in commercial sex acts.

5. Between on or about November 10, 2012, through on or about October 24, 2013, in the Eastern District of Pennsylvania and elsewhere, defendant

**JEREL JACKSON,
a/k/a "Jinx,"**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Minor 1, whose identity is known to the grand jury, and benefitted financially from participation in a venture which engaged in the knowing recruitment, enticement, harboring, transporting, providing, obtaining, and maintaining of Minor 1, and attempted to do so. At the time that defendant JEREL JACKSON did this, he knew and acted in reckless disregard of the fact that Minor 1 had not attained the age of 18 years and that Minor 1 would be caused to engage in a commercial sex act, and knew and acted in reckless disregard of the fact that force, threats of force, fraud, coercion, and any combination of such means would be used to cause Minor 1 to engage in a commercial sex act.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of Paragraphs 1 through 4 of Count One are incorporated by reference.

2. Between on or about May 1, 2012, through on or about July 17, 2013, in the Eastern District of Pennsylvania and elsewhere, defendant

**JEREL JACKSON,
a/k/a "Jinx,"**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Person 2, whose identity is known to the grand jury, and benefitted financially from participation in a venture which engaged in the knowing recruitment, enticement, harboring, transporting, providing, obtaining, and maintaining of Person 2, and attempted to do so. At the time that defendant JEREL JACKSON did this, he knew and acted in reckless disregard of the fact that force, threats of force, fraud, coercion, and any combination of such means would be used to cause Person 2 to engage in a commercial sex act.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of Paragraphs 1 through 4 of Count One are incorporated by reference.

2. Between on or about April 26, 2013, through on or about April 29, 2013, in the Eastern District of Pennsylvania and elsewhere, defendant

**JEREL JACKSON,
a/k/a "Jinx,"**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Person 3, whose identity is known to the grand jury, and benefitted financially from participation in a venture which engaged in the knowing recruitment, enticement, harboring, transporting, providing, obtaining, and maintaining of Person 3, and attempted to do so. At the time that defendant JEREL JACKSON did this, he knew and acted in reckless disregard of the fact that force, threats of force, fraud, coercion, and any combination of such means would be used to cause Person 3 to engage in a commercial sex act.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1591, set forth in this Indictment, defendant

**JEREL JACKSON,
a/k/a "Jinx,"**

shall forfeit to the United States of America:

- (a) any property, real or personal, constituting or derived from any proceeds obtained directly or indirectly as a result of such violation;
- (b) any property, real or personal, used or intended to be used to commit or to promote the commission of such violation; and
- (c) any visual depiction described in Title 18, United States Code, Sections 2251 and 2256, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received as a result of such violation.

2. If any of the property subject to 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 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;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853, to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 1594(d) and (e) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney