

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: September 5, 2013
DESHAWN KING, a/k/a "Wop," a/k/a "Mike"	:	VIOLATIONS:
DANIEL BLOUNT, a/k/a "Danny"	:	18 U.S.C. § 1594(c) (conspiracy to commit sex trafficking by force, fraud or coercion - 1 count)
	:	18 U.S.C. § 1591 (sex trafficking by force, fraud, or coercion - 2 counts)
	:	18 U.S.C. § 1594(a) (attempted sex trafficking by force, fraud, or coercion - 2 counts)
	:	Aiding and Abetting
	:	Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or about October 2012 continuing through in or around April 2013, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendants

**DESHAWN KING,
a/k/a "Wop,"
a/k/a "Mike," and
DANIEL BLOUNT,
a/k/a "Danny,"**

conspired and agreed together, and with others known and unknown to the grand jury, to knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in or affecting interstate commerce, women, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion would be used to cause women to engage in commercial sex acts.

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendants DESHAWN KING and DANIEL BLOUNT recruited and enticed heroin addicted women to perform commercial sex acts at their direction by promising a continuous supply of money and heroin.

3. Defendants DESHAWN KING and DANIEL BLOUNT used the website “backpage.com” to advertise women for commercial sex acts.

4. Defendants DESHAWN KING and DANIEL BLOUNT took photographs of women to place in advertisements on “backpage.com.”

5. “Johns” (men wanting to have sex with the recruited women) obtained commercial sex acts from the recruited women by calling a mobile telephone number placed in the backpage.com website advertisement by defendants DESHAWN KING and DANIEL BLOUNT and meeting the women at hotels designated and paid for by defendants KING and BLOUNT in and around Allentown, Pennsylvania.

6. Defendants DESHAWN KING and DANIEL BLOUNT received and kept all the proceeds generated by the women engaging in commercial sex acts.

7. Defendants DESHAWN KING and DANIEL BLOUNT used physical force and threats of physical force against women to cause or attempt to cause them to continue performing commercial sex acts.

8. Defendants DESHAWN KING and DANIEL BLOUNT provided heroin to women performing commercial sex acts and withheld heroin from the women, and manipulated the women’s access to heroin, as a form of punishment and control.

9. Defendants DESHAWN KING and DANIEL BLOUNT used vehicles, public roadways, hotels, telephones and the Internet to facilitate commercial sex acts.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendants DESHAWN KING and DANIEL BLOUNT committed the following overt acts, among others, in the Eastern District of Pennsylvania:

In or about October 2012 to in or about January 2013:

1. Defendants DESHAWN KING and DANIEL BLOUNT promised TG, a woman whom defendants knew to have a heroin addiction, that she would have a continuous supply of heroin, that she would make a lot of money, and that they would not assault her, if she performed commercial sex acts at their direction.

2. Defendant DESHAWN KING placed an advertisement depicting sexually explicit images of TG taken by defendant DANIEL BLOUNT on “backpage.com” advertising her availability for commercial sex acts and listed a prepaid mobile telephone number as a contact number.

3. Defendants DESHAWN KING and DANIEL BLOUNT rented hotel rooms at various Allentown area hotels for TG to use when performing commercial sex acts.

4. Defendants DESHAWN KING and DANIEL BLOUNT collected the money TG earned by performing commercial sex acts after each act was performed and the “John” left the hotel room.

5. Defendants DESHAWN KING and DANIEL BLOUNT manipulated TG’s access to heroin by providing and intentionally withholding heroin from TG at their will and

causing TG extreme suffering from heroin withdrawal.

6. Defendants DESHAWN KING and DANIEL BLOUNT responded to TG's requests to leave by threatening her and telling her they would find her if she tried.

7. Defendants DESHAWN KING and DANIEL BLOUNT physically assaulted TG including pushing her back and forth between them, and kicking and punching her.

8. Defendants DESHAWN KING and DANIEL BLOUNT physically assaulted TG with a taser.

In or about January 2013 to in or about April 2013:

9. Defendants DESHAWN KING and DANIEL BLOUNT promised AS, a woman known to defendants to be addicted to heroin, that she would have a continuous supply of heroin, that she would make a lot of money, and that she would have a place to stay, in exchange for her performing commercial sex acts.

10. Defendants DESHAWN KING and DANIEL BLOUNT promised AS they would split the money made by her performance of commercial sex acts.

11. Defendant DESHAWN KING placed an advertisement depicting sexually explicit images of AS on "backpage.com" advertising her availability for commercial sex acts and listed AS's mobile telephone number as a contact number.

12. Defendants DESHAWN KING and DANIEL BLOUNT instructed AS what to say to potential "Johns" in order to rule out law enforcement, instructed her how much to charge for sex acts, and instructed her where to meet the "Johns."

13. Defendants DESHAWN KING and DANIEL BLOUNT rented hotel rooms at various Allentown area hotels for AS to use when performing commercial sex acts.

14. On several occasions defendant DESHAWN KING physically assaulted AS while defendant DANIEL BLOUNT watched including when AS asked to leave and return home and when they expressed AS didn't earn enough money.

15. Defendants DESHAWN KING and DANIEL BLOUNT threatened AS with a taser.

16. Defendants DESHAWN KING and DANIEL BLOUNT collected the money AS earned by performing commercial sex acts after each act was performed and the "John" left the hotel room.

17. Defendants DESHAWN KING and DANIEL BLOUNT manipulated AS's access to heroin by providing and intentionally withholding heroin from AS at their will and causing AS extreme suffering from heroin withdrawal.

18. After AS stopped performing commercial sex acts for defendants DESHAWN KING and DANIEL BLOUNT, they found her at a friend's house, threatened her to get in their vehicle, took AS to a hotel room in Allentown and each took their turn raping her. After they were done, they threatened to kill her if she reported the rapes.

In or about February 2013 to in or about April 2013:

19. Defendant DESHAWN KING promised KK, a woman known to defendants to be addicted to heroin, that she would have a continuous supply of heroin, that she would make a lot of money, and that she would have a place to stay, in exchange for her performing commercial sex acts.

20. Defendants DESHAWN KING and DANIEL BLOUNT placed an advertisement depicting sexually explicit images of KK on "backpage.com" advertising her

availability for commercial sex acts and listed KK's mobile telephone number as a contact number.

21. Defendants DESHAWN KING and DANIEL BLOUNT rented hotel rooms at various Allentown area hotels for KK to use when performing commercial sex acts.

22. Defendants DESHAWN KING and DANIEL BLOUNT collected the money KK earned by performing commercial sex acts.

23. Defendants DESHAWN KING and DANIEL BLOUNT manipulated KK's access to heroin by providing and intentionally withholding heroin from KK at their will and causing KK extreme suffering from heroin withdrawal.

24. Defendant DESHAWN KING and DANIEL BLOUNT promised CK, a woman known to defendants to be addicted to heroin, that she would have a continuous supply of heroin, that she would make a lot of money, and that she would have a place to stay, in exchange for her performing commercial sex acts.

25. Defendants DESHAWN KING and DANIEL BLOUNT placed an advertisement depicting sexually explicit images purporting to be of CK on backpage.com advertising her availability for commercial sex acts and listed a prepaid mobile telephone number defendants KING and BLOUNT provided to CK.

26. Defendants DESHAWN KING and DANIEL BLOUNT rented hotel rooms at various Allentown area hotels for CK to use when performing commercial sex acts.

27. Defendants DESHAWN KING and DANIEL BLOUNT collected all the money CK earned by performing commercial sex acts.

28. Defendants DESHAWN KING and DANIEL BLOUNT manipulated CK's access to heroin by providing and intentionally withholding heroin from CK at their will and causing

CK extreme suffering from heroin withdrawal.

29. Defendants DESHAWN KING and DANIEL BLOUNT threatened both KK and CK to stay in the designated hotel room and that they “better not leave.”

30. Defendant DESHAWN KING threatened CK that if she ever “fucked” with him or his money, she would be dead.

31. After KK and CK stopped performing commercial sex acts for defendants DESHAWN KING and DANIEL BLOUNT, defendants KING and BLOUNT found both women at an Allentown area hotel and left a note in their hotel door, in part stating, “[KK] Im disappointed in you now your done but I will follow you guys an when ready jump out an have the new bitches whip that ass than we will finish u up. That new car will have sugar in the tank or a bunch of sand so be ready. Ah yes crazy bitches you can run but you can’t hide. Iv been watching you and [CK] for days when you least expect it we will pop up and brake both of your noses so be safe bitches Iv warned you both 2x now 3x and [CK] you been doing it way longer. But I know where you live next step house on fire.” The note listed a home address for CK.

All in violation of Title 21, United States Code, Section 1594(c).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 9 and Overt Acts 1 through 8 of Count One of this indictment are incorporated here.

2. Beginning in or about October 2012 and continuing to in or about January 2013, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendants

**DESHAWN KING,
a/k/a “Wop,”
a/k/a “Mike,” and
DANIEL BLOUNT,
a/k/a “Danny,”**

in and affecting interstate commerce, aiding and abetting one another, knowingly and intentionally recruited, enticed, harbored, transported, provided, obtained, and maintained, by any means, TG, knowing that force, threats of force, fraud, and coercion would be used to cause TG to engage in a commercial sex act, and attempted to do so.

In violation of Title 18, United States Code, Section 1591(a), 1594 and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 9 and Overt Acts 9 through 18 of Count One of this indictment are incorporated here.

2. Beginning in or about January 2013 and continuing to in or about April 2013, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendants

**DESHAWN KING,
a/k/a “Wop,”
a/k/a “Mike,” and
DANIEL BLOUNT,
a/k/a “Danny,”**

in and affecting interstate commerce, knowingly and intentionally recruited, enticed, harbored, transported, provided, obtained, and maintained, by any means, AS, knowing that force, threats of force, fraud, and coercion would be used to cause AS to engage in a commercial sex act.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 9 and Overt Acts 19 through 23, 29 and 31 of Count One of this indictment are incorporated here.

2. Beginning in or about February 2013 and continuing to in or about April 2013, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendants

**DESHAWN KING,
a/k/a “Wop,”
a/k/a “Mike,” and
DANIEL BLOUNT,
a/k/a “Danny,”**

in and affecting interstate commerce, attempted to knowingly and intentionally recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, KK, knowing that force, threats of force, fraud, and coercion would be used to cause KK to engage in a commercial sex act.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 9 and Overt Acts 24 through 28, and 29 through 31 of Count One of this indictment are incorporated here.

2. Beginning in or about February 2013 and continuing to in or about April 2013, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendants

**DESHAWN KING,
a/k/a “Wop,”
a/k/a “Mike,” and
DANIEL BLOUNT,
a/k/a “Danny,”**

in and affecting interstate commerce, attempted to knowingly and intentionally recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, CK, knowing that force, threats of force, fraud, and coercion would be used to cause CK to engage in a commercial sex act.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Section 1591(a) and 1594(c) and (d), set forth in this indictment, defendants

**DESHAWN KING,
a/k/a “Wop,”
a/k/a “Mike,” and
DANIEL BLOUNT,
a/k/a “Danny,”**

shall forfeit to the United States of America any property, real or personal, that was used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation of Title 18, United States Code, Sections 1591(a), and 1594(a)(c), or any property, real or personal, constituting or derived from, any proceeds that were obtained, directly or indirectly, as a result of such violation, as charged in this indictment.

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

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney