

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

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: November 20, 2014</b>
<b>KEVINO GRAHAM</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>BRIAN WRIGHT</b>	<b>:</b>	<b>18 U.S.C. § 1591 (sex trafficking</b>
<b>RENATO TEIXERA</b>	<b>:</b>	<b>by force - 2 counts);</b>
	<b>:</b>	<b>18 U.S.C. § 1594(a) (attempt)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times material to this indictment, defendant KEVINO GRAHAM was the operator of a prostitution venture in Philadelphia, Pennsylvania and elsewhere.
2. As part of this venture, defendant KEVINO GRAHAM recruited young females to work as prostitutes in his business. Defendant KEVINO GRAHAM engaged in acts of physical violence to maintain the participation of females in his prostitution business.
3. As part of this venture, defendant KEVINO GRAHAM created a website known as [www.passionatetouch.net](http://www.passionatetouch.net) and Internet advertisements in which he advertised various females as available for purchase for purposes of prostitution. These advertisements featured pictures of the females, scantily clad, and a phone number to call to arrange a meeting with a female for commercial sexual activity.
4. As part of this venture, defendants KEVINO GRAHAM and BRIAN WRIGHT leased a house and garage at 5029 Warren Street, Philadelphia, Pennsylvania, where they operated a “strip club” known as “Passionate Touch.” At this club, the females who worked

for the venture as prostitutes would dance as well as engage in sexual acts with customers in exchange for money.

5. As part of the venture, defendant BRIAN WRIGHT collected money at the “Passionate Touch” strip club run by defendant KEVINO GRAHAM.

6. As part of this venture, defendant RENATO TEIXERA helped to recruit females to work for the venture and posted prostitution advertisements for the females.

7. Between on or about May 1, 2009, through on or about August 23, 2013, in the Eastern District of Pennsylvania, defendants

**KEVINO GRAHAM,  
BRIAN WRIGHT, and  
RENATO TEIXERA**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Person 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 Person 1, and attempted to do so, and aided and abetted the same. At the time that defendants did this, they 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 1 to engage in a commercial sex act.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. The allegations of Paragraphs 1 through 6 of Count One are incorporated by reference.
2. Between on or about September 1, 2011, through on or about January 31, 2012, in the Eastern District of Pennsylvania and elsewhere, defendants

**KEVINO GRAHAM,  
BRIAN WRIGHT, and  
RENATO TEIXERA**

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 attempted recruitment, enticement, harboring, transporting, providing, obtaining, and maintaining of Person 2, attempted to do so, and aided and abetted the same. At the time that defendants did this, they 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) and 2.

**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, defendants

**KEVINO GRAHAM  
BRIAN WRIGHT, and  
RENATO TEIXERA**

shall forfeit to the United States of America:

- (a) any property, real or personal, used or intended to be used to commit, or to 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.

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(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

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

**A TRUE BILL:**

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**FOREPERSON**

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**ZANE DAVID MEMEGER**  
United States Attorney