

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: October 30, 2014
CORDERRO CODY, a/k/a "Gator," a/k/a "Footz," a/k/a "Daddy"	:	VIOLATIONS: 18 U.S.C. § 1594(c) (conspiracy to commit sex trafficking by force, fraud or coercion - 1 count) 18 U.S.C. 371 (conspiracy to transport individuals interstate to engage in prostitution - 1 count) 18 U.S.C. § 1591 (sex trafficking by force, fraud, or coercion - 4 counts) Aiding and Abetting Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or about 2009 continuing through in or about May 2014, in Allentown and Reading, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY,
a/k/a "Gator,"
a/k/a "Footz,"
a/k/a "Daddy"**

conspired and agreed 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. Defendant CORDERRO CODY, and Person #1, known to the Grand Jury, recruited women to perform commercial sex acts as part of CODY's "program;" his illegal commercial sex trafficking operation.

3. Defendant CORDERRO CODY used the website "backpage.com" to advertise women for commercial sex acts.

4. Defendant CORDERRO CODY 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 and meeting the women at hotels designated and paid for by defendant CORDERRO CODY in and around Allentown, Reading, Scranton, and Denver, Pennsylvania, and other locations including in New Jersey, New York, Maryland.

6. Defendant CORDERRO CODY received and kept most of the proceeds generated by the women engaging in commercial sex acts.

7. Defendant CORDERRO CODY used physical force and threats of physical force against women to cause or attempt to cause them to continue performing commercial sex acts.

8. Person #2, a taxi cab driver, known to the Grand Jury, transported women for commercial sex acts both intrastate and interstate, per defendant CORDERRO CODY's direction.

9. Defendant CORDERRO CODY 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, defendant CORDERRO CODY committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. In late 2009 to early 2010, defendant CORDERRO CODY recruited AD to work for him performing commercial sex acts.
2. Between late 2009 and May 2014, defendant CORDERRO CODY assaulted AD on many occasions for not following the rules of his "program;" his commercial sex trafficking operation, including not performing prostitution "dates" when he demanded.
3. In or about 2012, defendant CORDERRO CODY and Person #1 recruited CR to work for CODY performing commercial sex acts.
4. In or about July 2012, defendant CORDERRO CODY recruited MG to work for him performing commercial sex acts.
5. Between July and August 2012, defendant CORDERRO CODY physically assaulted MG on several occasions.
6. In or about November 2013, defendant CORDERRO CODY physically assaulted CR when she requested permission to go home to see her children for the Thanksgiving holiday.
7. In or about November 2013, defendant CORDERRO CODY recruited Person #2 to perform taxi cab services in furtherance of CODY's commercial sex trafficking operation.
8. Between November 2013 and May 2014, Person #2, at defendant CORDERRO CODY's direction drove AD, CR and others to various hotels in Allentown and

Reading, Pennsylvania and Gaithersburg, Maryland.

9. On or about January 25, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Reading, Pennsylvania.

10. On or about January 29, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Reading, Pennsylvania.

11. On or about January 31, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Reading, Pennsylvania.

12. On or about February 2, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Reading, Pennsylvania.

13. On or about February 27, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Gaithersburg, Maryland.

14. In or about March of 2014, defendant CORDERRO CODY transported MW to Allentown to engage in prostitution at his direction.

15. In or about March of 2014, Person #2, at defendant CORDERRO CODY's direction, purchased a BMW vehicle in Person #2's name, to be used by CODY in furtherance of his commercial sex trafficking operation.

16. On or about March 16, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising AD for

commercial sex acts in New Jersey.

17. On or about March 16, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in New Jersey.

18. On or about March 23, 2014, defendant CORDERRO CODY raped and physically assaulted CR at the America's Best Value Inn, in Allentown, Pennsylvania.

19. On or about March 31, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Queens, New York.

20. In or about March and April 2014, Person #2, permitted defendant CORDERRO CODY to have a mobile telephone used to facilitate CODY's commercial sex trafficking operation, linked to her personal mobile telephone account

21. On or about April 1, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Queens, New York.

22. On or about April 2, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Queens, New York.

23. On or about April 3, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Queens, New York.

24. On or about April 8, 2014, Person #2, at defendant CORDERRO CODY's direction, transported CR from Pennsylvania to a hotel in Gaithersburg, Maryland in furtherance of

CODY's commercial sex trafficking operation.

25. On or about April 9, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising CR for commercial sex acts in Gaithersburg, Maryland.

26. On or about April 16, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising AD for commercial sex acts in New Jersey.

27. On or about April 17, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising AD for commercial sex acts in New Jersey.

28. On or about April 26, 2014, defendant CORDERRO CODY assaulted CR for not following his rules and trying to leave his "program" causing her to lose consciousness.

29. On or about April 27, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising MW for commercial sex acts in Denver and Lancaster, Pennsylvania.

30. In or about April 2014, defendant CORDERRO CODY contacted MW to attempt to recruit MW into his "program."

31. In or about late April 2014, defendant CORDERRO CODY drove MW, against her will, from the Scranton, Pennsylvania area to Allentown, Pennsylvania and caused MW to engage in commercial sex acts for CODY's financial benefit; CODY told MW she couldn't go home until she made some money.

32. In or about late April 2014 and early May, 2014, defendant CORDERRO CODY assaulted MW including hitting her in the face causing injury to her eye, a bloody lip and a

loose tooth.

33. On or about May 4, 2014, defendant CORDERRO CODY attempted to prevent MW from leaving his vehicle to escape from him.

34. On or about May 7, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising MW for commercial sex acts in Brooklyn, New York.

35. On or about May 7, 2014, defendant CORDERRO CODY posted or caused to be posted an advertisement on the website "backpage.com" advertising AD for commercial sex acts in Allentown, Pennsylvania.

36. On or about May 20, 2014, defendant CORDERRO CODY caused AD to engage in commercial sex acts at the Red Roof Inn in Allentown, Pennsylvania.

37. On or about May 20, 2014, defendant CORDERRO CODY possessed four mobile devices, all used to promote his "program:" a Samsung Galaxy, a LG, a Kyocera and a Verizon.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. From at least in or about 2009 continuing through in or about May 2014, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY,
a/k/a "Gator,"
a/k/a "Footz,"
a/k/a "Daddy"**

conspired and agreed with others known and unknown to the grand jury, to knowingly transport any individual in interstate commerce with intent that such individual engage in prostitution, in violation of Title 18, United States Code, Section 2421.

MANNER AND MEANS

It was part of the conspiracy that:

2. Paragraphs 2 through 9 of Count One of this indictment are incorporated here.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its object, defendant CORDERRO CODY committed the following overt acts; among others, in the Eastern District of Pennsylvania, and elsewhere:

Overt Acts paragraphs 1, 3, 4, 7, 8, 13, 15 through 17, 19 through 27, 30, 34 and 37 of Count One of this indictment are incorporated here.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 9 and Overt Acts 1, 2, 7, 8, 15, 16, 20, 26, 27, and 35 through 37 of Count One of this indictment are incorporated here.

2. Beginning in 2009 and continuing to on or about May 20, 2014, in Allentown and Reading, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY,
a/k/a "Gator,"
a/k/a "Footz,"
a/k/a "Daddy"**

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

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 9 and Overt Acts 3, 6, 7, 8 through 13, 15, 17 through 25, 28 and 37 of Count One of this indictment are incorporated here.

2. Beginning in or about 2011 and continuing to on or about April 26, 2014, in Allentown and Reading, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY,
a/k/a "Gator,"
a/k/a "Footz,"
a/k/a "Daddy"**

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

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 9 and Overt Acts 7, 8, 14, 15, 20, 29 through 34 and 37 of Count One of this indictment are incorporated here.

2. Beginning in or about April 2014 and continuing to in or about May 2014, in Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY,
a/k/a "Gator,"
a/k/a "Footz,"
a/k/a "Daddy"**

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

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 2 through 9 and Overt Acts 4 and 5 of Count One of this indictment are incorporated here.

2. Beginning in or about June 2012 and continuing to in or about August 2012, in Allentown and Reading in the Eastern District of Pennsylvania, and elsewhere, defendant

**CORDERRO CODY,
a/k/a "Gator,"
a/k/a "Footz,"
a/k/a "Daddy"**

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

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

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, defendant

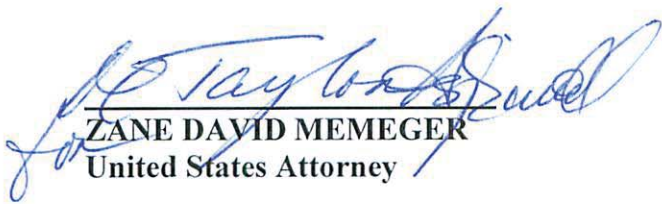
**CORDERRO CODY,
a/k/a "Gator,"
a/k/a "Footz,"
a/k/a "Daddy"**

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).

A TRUE BILL:

GRAND JURY FOREPERSON


ZANE DAVID MEMEGER
United States Attorney



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

INDICTMENT

DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff: 14a 583
615 Chestnut Street, Suite 1250, Philadelphia, PA 19106-4476

Post Office: Philadelphia County: Philadelphia

City and State of Defendant: Allentown, PA

County: Lehigh Register number: N/A

Place of accident, incident, or transaction: Eastern District of Pennsylvania

Post Office: Allentown County: Lehigh

RELATED CASE, IF ANY:

Criminal cases are deemed related when the answer to the following question is "yes".

Does this case involve a defendant or defendants alleged to have participated in the same action or transaction, or in the same series of acts or transactions, constituting an offense or offenses?

YES/NO: No

Case Number: Judge:

CRIMINAL: (Criminal Category - FOR USE BY U.S. ATTORNEY ONLY)

- 1. Antitrust
- 2. Income Tax and other Tax Prosecutions
- 3. Commercial Mail Fraud
- 4. Controlled Substances
- 5. Violations of 18 U.S.C. Chapters 95 and 96 (Sections 1951-55 and 1961-68) and Mail Fraud other than commercial
- 6. General Criminal

(U.S. ATTORNEY WILL PLEASE DESIGNATE PARTICULAR CRIME AND STATUTE CHARGED TO BE VIOLATED AND STATE ANY PREVIOUS CRIMINAL NUMBER FOR SPEEDY TRIAL ACT TRACKING PURPOSES)

18 U.S.C. § 1594(c) (conspiracy to commit sex trafficking by force, fraud or coercion - 1 count); 18 U.S.C. 371 (conspiracy to transport individuals interstate to engage in prostitution - 1 count); 18 U.S.C. § 1591 (sex trafficking by force, fraud, or coercion - 4 counts); Aiding and Abetting; and Notice of Forfeiture

DATE: October 30, 2014

Sozi Tulank for
SHERRI A. STEPHAN
Assistant United States Attorney