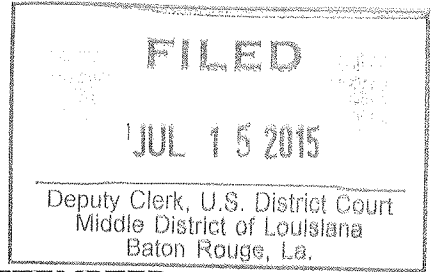


UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA



**INDICTMENT FOR SEX TRAFFICKING OF A MINOR, ATTEMPTED
SEX TRAFFICKING OF A MINOR, OBSTRUCTION OF
JUSTICE, USE OF INTERSTATE FACILITIES IN AID OF
RACKETEERING, AND FORFEITURE ALLEGATION**

UNITED STATES OF AMERICA : CRIMINAL NO. 15- 112-JwD- SCR
:
:
: 18 U.S.C. § 1591(a)(1)
: 18 U.S.C. § 1591(a)(2)
: 18 U.S.C. § 1591(d)
KELLIE M. DOMINIQUE : 18 U.S.C. § 1594(a)
: 18 U.S.C. § 1952
: 18 U.S.C. § 2
: 18 U.S.C. § 981(a)(1)(C)
: 28 U.S.C. § 2461
: 18 U.S.C. § 1594(d)

THE GRAND JURY CHARGES:

At All Times Herein:

1) **KELLIE M. DOMINIQUE** (“**DOMINIQUE**”), defendant herein, promoted a business enterprise involving prostitution out of her residence, as well as other venues, in Baton Rouge, Louisiana.

2) A female juvenile under the age of 18 years old, hereinafter referred to as “the minor female,” lived with **DOMINIQUE** in Baton Rouge and worked as a prostitute.

DOMINIQUE had physical custody of the minor female.

3) “Backpage.com” was a classified advertising website, accessible through the internet, that offered a wide variety of classified listings. “Backpage.com” had a section for advertising escort, body rub, stripper, and strip club services. The minor female, and others,

used “backpage.com” to post advertisements to promote and carry on **DOMINIQUE’s** prostitution business in Louisiana, and elsewhere, by advertising commercial sex acts through the internet on backpage.com.

4) **DOMINIQUE** and the minor female regularly used telephones to manage and carry on a business enterprise involving prostitution by, among other things, using telephones to schedule prostitution sessions and coordinate the discussion of the proceeds earned from the prostitution sessions.

COUNT ONE

Sex Trafficking of a Minor

5) Paragraphs 1 through 4 of this Indictment are incorporated herein as factual allegations.

6) From at least in or about August 2013, until at least in or about September 2013, within the Middle District of Louisiana and elsewhere, **KELLIE M. DOMINIQUE**, defendant herein, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, in and affecting interstate commerce, the minor female, and did attempt to do so, knowing and in reckless disregard of the fact that the minor female had not attained the age of 18 years, and that the minor female would be caused to engage in a commercial sex act.

The above is a violation of Title 18, United States Code, Sections 1591(a)(1), 1594(a), and 2.

COUNT TWO

Attempted Sex Trafficking of a Minor

7) Paragraphs 1 through 4 of this Indictment are incorporated herein as factual allegations.

8) From at least in or about August 2013, until at least in or about September 2013, within the Middle District of Louisiana and elsewhere, **KELLIE M. DOMINIQUE**, defendant herein, did attempt to knowingly benefit, financially and by receiving anything of value, from participation in a venture which had recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, in an affecting interstate commerce, the minor female, knowing and in reckless disregard of the fact that the minor female had not attained the age of 18 years, and that the minor female would be caused to engage in a commercial sex act.

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

COUNT THREE

Obstruction of Justice

9) Paragraphs 1 through 4 of this Indictment are incorporated herein as factual allegations.

10) From at least in or about September 2013, until at least in or about December 2013, within the Middle District of Louisiana and elsewhere, **KELLIE M. DOMINIQUE**, defendant herein, did knowingly obstruct, attempt to obstruct, and interfere with the enforcement of Title 18, United States Code, Section 1591, by, among other things, making false statements to government officials, and corruptly influencing potential witnesses.

The above is a violation of Title 18, United States Code, Sections 1591(d) and 2.

COUNTS FOUR THROUGH SEVEN

Use of an Interstate Facility in Aid of Racketeering

11) Paragraphs 1 through 4 of this Indictment are incorporated herein as factual allegations.

12) On or about the following dates, **KELLIE M. DOMINIQUE**, defendant herein, used facilities in interstate commerce, namely telephones, with the intent to promote, manage, establish, carry on, and facilitate an unlawful activity, namely a business enterprise involving prostitution, in violation of Title 14, Louisiana Revised Statutes, Section 82, and thereafter performed the below described acts to promote, manage, establish, carry on, and facilitate said unlawful activity, each count constituting a separate offense:

COUNT	DATE	DESCRIPTION	SUBSEQUENT ACT
4	August 5, 2013	Text message informing the minor female that DOMINIQUE hoped the minor female had earned proceeds by engaging in prostitution.	Text message indicating that the minor female had not yet earned proceeds, however, minor female had proceeds forthcoming from engaging in prostitution.
5	August 25, 2013	Text message seeking approval for minor female to perform scheduled prostitution sessions at DOMINIQUE 's home.	Text message approving the minor female's performance of scheduled prostitution sessions at DOMINIQUE 's home so that DOMINIQUE could use proceeds from prostitution sessions to pay her and minor female's cellular phone bill.
6	August 27, 2013	Text message inquiring whether the minor female had earned proceeds from engaging in prostitution sessions.	Text message telling DOMINIQUE to notify the minor female prior to arrival at DOMINIQUE 's home so that the minor female would not have clients present at the home.
7	September 2, 2013	Text message informing DOMINIQUE that minor female was going to engage in prostitution sessions in order to earn proceeds for the minor female and DOMINIQUE .	Text message acknowledging the minor female's intent to engage in prostitution sessions to earn proceeds, and request for minor female to provide DOMINIQUE with the proceeds from the prostitution sessions.

Each of the above is a violation of Title 18, United States Code, Sections 1952 and 2.

FORFEITURE ALLEGATION

13) Paragraphs 1 through 12 of this Indictment are incorporated herein.

14) Upon conviction of the offenses charged in Counts One through Three of this Indictment, **KELLIE M. DOMINIQUE**, defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d)(1) and (2), defendant's interest in any property, real or personal, that was used or intended to be used, to commit or to facilitate the commission of such violations; and any property real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such offenses.

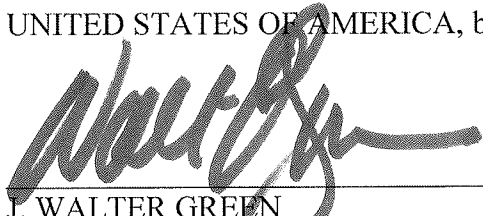
15) Upon conviction of the offenses charged in Counts Four through Seven involving use of interstate facilities in aid of racketeering, **KELLIE M. DOMINIQUE**, defendant herein, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to said violations.

16) If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

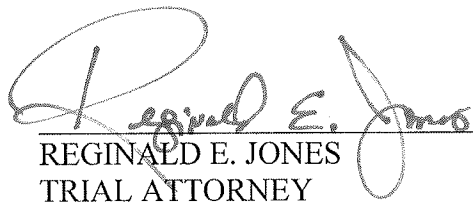
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

UNITED STATES OF AMERICA, by



J. WALTER GREEN
UNITED STATES ATTORNEY

A TRUE BILL


GRAND JURY FOREPERSON
REGINALD E. JONES
TRIAL ATTORNEY

7/15/15
DATE


JAMIE A. FLOWERS, JR.
ASSISTANT U.S. ATTORNEY

7/15/15
DATE

Criminal Cover Sheet

U.S. District Court

Place of Offense:

Matter to be sealed: No Yes

City Baton Rouge

Related Case Information:

County/Parish East Baton Rouge

Superseding Indictment _____ Docket Number _____

Same Defendant _____ New Defendant _____

*Investigating Agency FBI

Magistrate Case Number _____

*Agent Taneka Harris

Search Warrant Case No. _____

R 20/ R 40 from District of _____

Any Other Related Cases: 14-43-SDD-RLB

Defendant Information:

Defendant Name Kellie M. Dominique

Alias Kellie Marie Dominique; Kellie M. Robichaux

Address _____

Birthdate _____ SS # _____ Sex _____ Race _____ Nationality _____

U.S. Attorney Information:

AUSA Jamie A. Flowers, Jr.

Bar # GABRN 940394

Interpreter: No Yes

List language and/or dialect: _____

Location Status:

Arrest Date _____
_____ Already in Federal Custody as of _____
_____ Already in State Custody _____
_____ On Pretrial Release _____

U.S.C. Citations:

Total # of Counts: 7

<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>	<u>Petty/ Misdemeanor/ Felony</u>
<u>18:1591(a)(1)</u>	<u>Sex Trafficking of a Minor</u>	<u>1</u>	<u>F</u>
<u>18:1591(a)(2)</u>	<u>Attempted Sex Trafficking of a Minor</u>	<u>2</u>	<u>F</u>
<u>18:1591(d)</u>	<u>Obstruction of Justice</u>	<u>3</u>	<u>F</u>
<u>18:1592</u>	<u>Use of Interstate Facilities in Aid of Racketeering</u>	<u>4-7</u>	<u>F</u>

Date: 7/15/15

Signature of AUSA: Jamie A. Flowers, Jr.

District Court Case Number (To be filled in by deputy clerk): _____