

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

UNITED STATES OF AMERICA )

CR. NO. 6:23cr575

vs. )

- ) 18 U.S.C. § 1591(a)(1)
- ) 18 U.S.C. § 1591(b)(1)
- ) 18 U.S.C. § 1591(b)(2)
- ) 18 U.S.C. § 1591(c)
- ) 18 U.S.C. § 1591(d)
- ) 18 U.S.C. § 1952
- ) 18 U.S.C. § 1952(a)(2)(A)
- ) 18 U.S.C. § 1952(a)(3)(A)
- ) 18 U.S.C. § 1594(a)
- ) 18 U.S.C. § 1594(a)(2)
- ) 18 U.S.C. § 1594(d)(1)
- ) 18 U.S.C. § 1594(d)(2)
- ) 18 U.S.C. § 981(a)(1)(C)
- ) 28 U.S.C. § 2461(c)

AARON T. SIMMONS (A.K.A. "ACE") )

INDICTMENT

**RECEIVED**

JUL 25 2023

FLORENCE, S.C.

THE GRAND JURY CHARGES:

COUNT 1

*(18 U.S.C. § 1591(a)(1), (b)(1) – Sex Trafficking by Force, Fraud, and Coercion)*

Beginning in or about August 2019 and continuing through in or about August 2020, in the District of South Carolina, Greenville, South Carolina, and elsewhere, defendant **AARON T. SIMMONS** attempted to, and did, knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, that is, **VICTIM 1**, an adult female whose identity is known to the Grand Jury, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, and any combination of such means would be used to cause **VICTIM 1** to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1), 1594(a), and 2.

COUNT 2

*(18 U.S.C. § 1591(a)(1), (b)(1) – Sex Trafficking by Force, Fraud, and Coercion)*

THE GRAND JURY FURTHER CHARGES:

Beginning in or about August 2019 and continuing through in or about August 2020, in the District of South Carolina, Greenville, South Carolina, and elsewhere, defendant **AARON T. SIMMONS** attempted to, and did, knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, that is, **VICTIM 2**, an adult female whose identity is known to the Grand Jury, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, and any combination of such means would be used to cause **VICTIM 2** to engage in an a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1), 1594(a), and 2.

COUNT 3

*(18 U.S.C. § 1591(a)(1), (b)(1) – Sex Trafficking by Force, Fraud, and Coercion)*

THE GRAND JURY FURTHER CHARGES:

Beginning in or about September 2019 and continuing through in or about November 2019, in the District of South Carolina, Greenville, South Carolina, and elsewhere, defendant **AARON T. SIMMONS** attempted to, and did, knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, that is, **VICTIM 3**, an adult female whose identity is known to the Grand Jury, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, and any combination of such means would be used to cause **VICTIM 3** to engage in an a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1), 1594(a), and 2.

COUNT 4

*(18 U.S.C. § 1591(a)(1), (b)(2) – Sex Trafficking of a Minor)*

THE GRAND JURY FURTHER CHARGES:

Beginning in or about August 2019 and continuing through in or about November 2019, in the District of South Carolina, Greenville, South Carolina, and elsewhere, defendant **AARON T. SIMMONS** attempted to, and did, knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, MV-1, a female whose identity is known to the Grand Jury and who had not attained the age of 18 years, knowing, and in reckless disregard of the fact that MV-1 had not attained the age of 18 years and would be caused to engage in a commercial sex act, and having had a reasonable opportunity to observe MV-1.

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c).

COUNT 5

*(18 U.S.C. § 1952 – Interstate Travel to Promote Unlawful Activity)*

THE GRAND JURY FURTHER CHARGES:

Beginning in or about August 2019 and continuing through in or about August 2020, in the District of South Carolina, Greenville, South Carolina, and elsewhere, defendant **AARON T. SIMMONS** attempted to, and did, knowingly travel in interstate commerce with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, a business enterprise involving prostitution offenses in violation of the laws of South Carolina, Florida, Georgia, North Carolina, Ohio, and Tennessee, and thereafter, did perform, and attempt to perform, an act to promote, manage, establish, carry

on, and facilitate the promotion, management, establishment, and carrying on of such unlawful activity.

In violation of Title 18, United States Code, Sections 1952(a)(3)(A) and 2.

COUNT 6

*(18 U.S.C. § 1952 – Use of Interstate Facility to Promote Unlawful Activity)*

THE GRAND JURY FURTHER CHARGES:

Beginning in or about August 2019 and continuing through in or about August 2020, in the District of South Carolina, Greenville, South Carolina, and elsewhere, defendant **AARON T. SIMMONS** attempted to, and did, knowingly use, and cause to be used, a facility in interstate commerce, that is, the use of the internet and cellular phones with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, a business enterprise involving prostitution offenses in violation of the laws of South Carolina, and thereafter, did perform, and attempt to perform, an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of such unlawful activity.

In violation of Title 18, United States Code, Sections 1952(a)(3)(A) and 2.

COUNT 7

*(18 U.S.C. § 1591(d) – Obstruction)*

THE GRAND JURY FURTHER CHARGES:

On or about November 23, 2021, in the District of South Carolina, Greenville, South Carolina, defendant **AARON T. SIMMONS** knowingly obstructed, and attempted to obstruct, in any way interfered with, and prevented the enforcement of Title 18, United States Code, Section

1591, by instructing VICTIM 1, an adult female whose identity is known to the Grand Jury, to provide false information to law enforcement regarding **AARON T. SIMMONS's** involvement in sex trafficking crimes.

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

**FORFEITURE**

**SEX TRAFFICKING/OBSTRUCTION:**

Upon conviction for violations of Title 18, United States Code, Section 1591, as charged in this Indictment, the Defendant, **AARON T. SIMMONS**, shall forfeit to the United States any property used or intended to be used, in any manner or part, to commit or facilitate the commission of the offenses, and any property, real or personal, constituting, derived from or traceable to proceeds the Defendant obtained, directly or indirectly, as a result of such offenses.

**USE OF INTERSTATE TO PROMOTE UNLAWFUL ACTIVITY:**

Upon conviction for violations of Title 18, United States Code, Section 1952, as charged in this Indictment, the Defendant, **AARON T. SIMMONS**, shall forfeit to the United States any property, real or personal, which constitutes, is traceable, or is derived from any proceeds obtained, directly or indirectly, as a result of such offenses.

**PROPERTY:**

The property subject to forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 1594(d)(1) and (2), and Title 28, United States Code, Section 2461(c), includes, but is not limited to, the following:

**Proceeds/Forfeiture Judgment:**

A sum of money equal to all proceeds the Defendant obtained, directly or indirectly, from the offenses charged in this Indictment, and all interest and proceeds traceable thereto, and/or such sum that equals all property derived from or traceable to his violations of Title 18.

SUBSTITUTE ASSETS:

If any of the property described above, 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 21, United States Code, Section 853(p), as incorporated by 18 U.S.C. § 982(b)(1) to seek forfeiture of any other property of the Defendant up to an amount equivalent to the value of the above-described forfeitable property.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 1594(d)(1) and (2), and Title 28, United States Code, Section 2461(c).

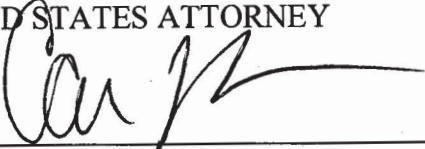
A True BILL

REDACTED

~~FOREPERSON~~

ADAIR F. BOROUGHS  
UNITED STATES ATTORNEY

By: \_\_\_\_\_

  
 Carrie Fisher Sherard (Fed. ID #10134)  
 Assistant United States Attorney  
 55 Beattie Place, Suite 700  
 Greenville, SC 29605  
 Tel.: 864-282-2100  
 Fax: 864-233-3158  
 Email: carrie.a.fisher@usdoj.gov