

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

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED: September 10, 2015
RAYMOND JUSTIS, a/k/a "Jordan"	:	VIOLATIONS:
	:	18 U.S.C. § 1591 (sex trafficking of a minor - 1 count);
	:	18 U.S.C. § 1594(a) (attempt)
	:	18 U.S.C. § 2 (aiding and abetting) Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, defendant, RAYMOND JUSTIS, a/k/a "Jordan" was the operator of a prostitution venture in Philadelphia, Pennsylvania, and elsewhere.
2. As part of this venture, defendant RAYMOND JUSTIS, a/k/a "Jordan," recruited young females to work as prostitutes in his business. One of these females, Minor 1, whose name is known to the grand jury, was under the age of 18.
3. As part of this venture, defendant RAYMOND JUSTIS, a/k/a "Jordan," created 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. Between on or about March 1, 2015, through on or about March 31, 2015, in the Eastern District of Pennsylvania and elsewhere, defendant

**RAYMOND JUSTIS,
a/k/a "Jordan,"**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained Minor 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 Minor 1, and attempted to do so. At the time that defendant RAYMOND JUSTIS did this, he knew and acted in reckless disregard of the fact that Minor 1 was under the age of 18 and would be caused to engage in a commercial sex act.

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

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, defendant

**RAYMOND JUSTIS,
a/k/a "Jordan,"**

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:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney