IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA GAINESVILLE DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 1:17CR19-MW/GRJ

PILED IN OPEN COUNT

RAJHEEM KWAMAINE RODDEY a/k/a "Cash"

STATEMENT OF FACTS

THE UNITED STATES OF AMERICA, by and through the undersigned Assistant United States Attorney, provides this factual basis for the acceptance of the guilty plea of the Defendant, Rajheem Kwamaine Roddey. Should this case proceed to trial, the government is prepared to present evidence as follows:

Between April 25, 2017, and June 12, 2017, Rajheem Kwamaine Roddey and others were involved in a scheme to make money using a 14 year old minor female, M.H., to perform sex acts. Photographs of M.H. were taken and used to create an advertisement on Backpage.com, an Internet advertising website. The advertisements were posted in a section for "escort services," when in truth, the advertisements were for the purpose of offering M.H. for commercial sexual activity. Individuals, referred to as "clients" or "johns," responded to the advertisements by texting or calling a cell phone number included in the advertisements. After receiving responses, M.H. was transported to various locations in the Northern

District of Florida, including private residences and motels, for the purpose of engaging in sexual activity with the "johns." On several occasions, Roddey Roddey was aware that M.H. was being transported by others accompanied others transporting M.H. to these locations knowing that M.H. was for this involved in commercial sexual activity. M.H. was paid for this sexual activity, and purpose. Roddey and others profited and benefitted from M.H.'s commercial sexual activity through cash and the sale of drugs purchased with the proceeds. During this period, Roddey had a reasonable opportunity to observe M.H., and acted in reckless disregard of the fact that M.H. was 14 years of age.

Elements of the Offense

The elements of the offense for which the defendant is entering his guilty plea are as follows:

First:

That the defendant benefitted, financially or by receiving anything of value, from participation in a venture which had engaged in an act in which M.H. was recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, or solicited by any means a person, for the purpose of engaging in a commercial sex act;

Second: That the Defendant did so knowing or in reckless disregard of

the fact that the person had not attained the age of 18 years.

<u>Third</u>: That the Defendant's acts were in or affected interstate or

foreign commerce.

CHRISTOPHER P. CANOVA United States Attorney

Thomas Edwards

Attorney for Defendant

Date

Rajheem Kwamaine Roddey

Defendant

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