

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

The Honorable Benjamin H. Settle

May 18 20 22  
Ravi Subramanian, Clerk  
By *[Signature]* Deputy

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

UNITED STATES OF AMERICA,  
Plaintiff,

NO. CR20-5377 BHS

v.

**SUPERSEDING INDICTMENT**

DOMINIQUE TERREL GONZALES,  
Defendant.

The Grand Jury charges that:

**COUNT 1**

**(Sex Trafficking of a Minor (JF1))**

Beginning in or about June 2020, and continuing until on or about August 25, 2020, in Clark County, within the Western District of Washington, and elsewhere, DOMINIQUE TERREL GONZALES did, in and affecting interstate commerce, knowingly recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, JF1, a minor female who had not attained the age of eighteen years, knowing, and in reckless disregard of the fact, that JF1 had not attained the age of eighteen years and would be caused to engage in a commercial sex act.

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



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

3 **COUNT 5**

4 **(Transportation of an Adult Female (G.E.) for the Purpose of Prostitution)**

5 During June 2019, in King County, within the Western District of Washington,  
6 and elsewhere, DOMINIQUE TERREL GONZALES did knowingly persuade, induce,  
7 entice, and coerce an adult female, G.E., to travel in interstate commerce, that is, from the  
8 State of Idaho to the State of Washington, to engage in prostitution and sexual activity for  
9 which any person can be charged with a criminal offense.

10 All in violation of Title 18, United States Code, Section 2422(a).

11 **COUNT 6**

12 **(Sex Trafficking of an Adult Female (M.W.) by Force, Fraud and Coercion)**

13 Beginning in or about August 2016, and continuing until on or about August 25,  
14 2020, in King County, within the Western District of Washington, and elsewhere,  
15 DOMINIQUE TERREL GONZALES did, in and affecting interstate commerce,  
16 knowingly recruit, entice, harbor, transport, provide, and obtain by any means, an adult  
17 female, M.W., knowing that force, fraud, and coercion, and any combination of such  
18 means, would be used to cause M.W. to engage in commercial sex acts.

19 All in violation of Title 18, United States Code, Sections 1591(a)(1) and  
20 1591(b)(1).

21 **COUNT 7**

22 **(Unlawful Possession of Firearm and Ammunition)**

23 On or about August 25, 2020, in Clark County, within the Western District of  
24 Washington, DOMINIQUE TERREL GONZALES, knowing that he had been convicted  
25 of the following crimes punishable by imprisonment for a term exceeding one year, to  
26 wit:

1 i. *Assault Second Degree – Domestic Violence* (two counts),  
2 under cause number 13-1-14303-4, dated on or about August 29, 2014, in King County  
3 Superior Court, and

4 ii. *Unlawful Imprisonment – Domestic Violence*, under cause  
5 number 13-1-14303-4, dated on or about August 29, 2014, in King County Superior  
6 Court,

7 did knowingly possess, in and affecting interstate and foreign commerce, the following  
8 firearm and ammunition, specifically, a Desert Eagle 9mm semiautomatic handgun and  
9 Winchester .38 caliber ammunition, each of which had been shipped and transported in  
10 interstate and foreign commerce.

11 All in violation of Title 18, United States Code, Section 922(g)(1).

12 **FORFEITURE ALLEGATION**

13 The allegations in Counts 1 through 7 of this Superseding Indictment are hereby  
14 realleged and incorporated by reference herein for the purpose of alleging forfeiture.

15 Upon conviction of the offenses charged in Counts 1, 4, and 6 of this Superseding  
16 Indictment, the Defendant, DOMINIQUE TERREL GONZALES, shall forfeit to the  
17 United States, pursuant to Title 18, United States Codes, Section 1594(d), any property  
18 that constitutes or is traceable to proceeds of the offense, as well as any firearms and  
19 ammunition involved in the offense. This property includes, but is not limited to:

20 a. The \$12,400 in U.S. currency seized from the Defendant during the  
21 search of his apartment on August 25, 2020;

22 b. the Desert Eagle 9 mm semiautomatic firearm, with extended high  
23 capacity magazine, seized from the Defendant during the search of his apartment on  
24 August 25, 2020; and

25 c. the nearly full box of Winchester .38 caliber ammunition seized  
26 from the Defendant during the search of his apartment on August 25, 2020.

27 Upon conviction of the offenses charged in Counts 2 and 5 of this Superseding  
28 Indictment, the Defendant, DOMINIQUE TERREL GONZALES, shall forfeit to the  
United States, pursuant to Title 18, United States Code, Section 2428(a) any property that

1 constitutes or is derived from proceeds of the offense, as well as any property used or  
2 intended to be used to commit or facilitate the offense.

3       Upon conviction of the offense charged in Count 3 of this Superseding Indictment,  
4 the Defendant, DOMINIQUE TERREL GONZALES, shall forfeit to the United States,  
5 pursuant to Title 18, United States Code, Section 2253(a), any property constituting or  
6 traceable to proceeds of the offense, and any property used or intended to be used to  
7 commit or to promote the offense.

8       Upon conviction of the offense charged in Count 7 of this Superseding Indictment,  
9 the Defendant, DOMINIQUE TERREL GONZALES, shall forfeit to the United States,  
10 pursuant to Title 18, United States Code, Section 924(d)(1), by way of Title 28, United  
11 States Code, Section 2461(c), any firearms and associated ammunition involved in the  
12 offense. This property includes, but not limited to:

13           a.     the Desert Eagle 9 mm semiautomatic firearm, with extended high  
14 capacity magazine, seized from the Defendant during the search of his apartment on  
15 August 25, 2020; and

16           b.     the nearly full box of Winchester .38 caliber ammunition seized  
17 from the Defendant during the search of his apartment on August 25, 2020.

18       **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
19 any act or omission of the defendant,

- 20           a.     cannot be located upon the exercise of due diligence;  
21           b.     has been transferred or sold to, or deposited with, a third party;  
22           c.     has been placed beyond the jurisdiction of the Court;  
23           d.     has been substantially diminished in value; or,  
24           e.     has been commingled with other property which cannot be divided  
25                 without difficulty,

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1 it is the intent of the United States to seek the forfeiture of any other property of the  
2 defendant, up to the value of the above-described forfeitable property, pursuant to  
3 Title 21, United States Code, Section 853(p).

4 A TRUE BILL:

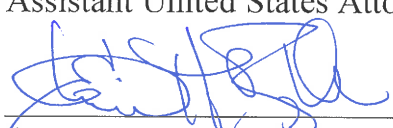
5  
6 DATED: 18 May 2022

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8 *Signature of Foreperson redacted pursuant*  
9 *to the policy of the Judicial Conference of*  
10 *the United States.*

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FOREPERSON

  
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NICHOLAS W. BROWN  
United States Attorney

  
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TODD GREENBERG  
Assistant United States Attorney

  
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CATHERINE L. CRISHAM  
Assistant United States Attorney