

FILED

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U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTHONY HAYNES,
KENNETH BUTLER, and
CORDELL JENKINS,

Defendants.

) SUPERSEDING
) INDICTMENT

) CASE NO. 3:17CR158

) JUDGE JACK ZOUHARY

) Title 18, Section 1591(a)(1), (b)(2), (c) and
) (d), United States Code

) Title 18, Section 1594(c), United States
) Code

) Title 18, Section 2251(a) and (e), United
) States Code

) Title 18, Section 2252(a)(2), United States
) Code

)

COUNT 1

**Conspiracy to Sex Traffic Children
18 U.S.C. § 1594(c)**

The Grand Jury charges:

Beginning in or about June 2014, and continuing until in or about March 2017, in the Northern District of Ohio, Western Division, and elsewhere, the defendants, ANTHONY HAYNES, KENNETH BUTLER, and CORDELL JENKINS, conspired and agreed with each other to knowingly recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit, specifically JUVENILE #1 and other minors, in and affecting interstate and foreign

ORIGINAL

commerce, knowing, and in reckless disregard of the fact, that JUVENILE #1 and other minors had not attained the age of 18 years and would be caused to engage in a commercial sex act, and did so having had a reasonable opportunity to observe JUVENILE #1 and other minors, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c) as set forth in Counts 2 through 6 of this Superseding Indictment.

All in violation of Title 18, United States Code, Section 1594(c).

COUNT 2
Sex Trafficking of Children
18 U.S.C. § 1591(a)(1), (b)(2), and (c)

The Grand Jury further charges:

Beginning in or about June 2014, and continuing until in or about March 2017, in the Northern District of Ohio, Western Division, the defendant, ANTHONY HAYNES, in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit, by any means, a person, that is, JUVENILE #1, knowing, and in reckless disregard of the fact, that JUVENILE #1 had not attained the age of 18 years and would be caused to engage in a commercial sex act, and did so having had a reasonable opportunity to observe JUVENILE #1, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c).

COUNT 3
Sex Trafficking of Children
18 U.S.C. § 1591(a)(1), (b)(2), and (c)

The Grand Jury further charges:

Beginning in or about 2015, and continuing until in or about March 2017, in the Northern District of Ohio, Western Division, and elsewhere, the defendant, KENNETH BUTLER, in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport,

provide, obtain, maintain, patronize, and solicit, by any means, a person, that is, JUVENILE #1, knowing, and in reckless disregard of the fact, that JUVENILE #1 had not attained the age of 18 years and would be caused to engage in a commercial sex act, and did so having had a reasonable opportunity to observe JUVENILE #1, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c).

COUNT 4
Sex Trafficking of Children
18 U.S.C. § 1591(a)(1), (b)(2), and (c)

The Grand Jury further charges:

Beginning in or about February 2015, and continuing until in or about March 2017, in the Northern District of Ohio, Western Division, and elsewhere, the defendant, KENNETH BUTLER, in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit, by any means, a person, that is, JUVENILE #2, knowing, and in reckless disregard of the fact, that JUVENILE #2 had not attained the age of 18 years and would be caused to engage in a commercial sex act, and did so having had a reasonable opportunity to observe JUVENILE #2, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c).

COUNT 5
Sex Trafficking of Children
18 U.S.C. § 1591(a)(1), (b)(2), and (c)

The Grand Jury further charges:

Beginning in or about December 2016, and continuing until in or about March 2017, in the Northern District of Ohio, Western Division, the defendant, CORDELL JENKINS, in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit, by any means, a person, that is, JUVENILE #1,

knowing, and in reckless disregard of the fact, that JUVENILE #1 had not attained the age of 18 years and would be caused to engage in a commercial sex act, and did so having had a reasonable opportunity to observe JUVENILE #1, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c).

COUNT 6
Sex Trafficking of Children
18 U.S.C. § 1591(a)(1), (b)(2), and (c)

The Grand Jury further charges:

In or about March 2017, in the Northern District of Ohio, Western Division, the defendant, CORDELL JENKINS, in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit, by any means, a person, that is, JUVENILE #3, knowing, and in reckless disregard of the fact, that JUVENILE #3 had not attained the age of 18 years and would be caused to engage in a commercial sex act, and did so having had a reasonable opportunity to observe JUVENILE #3, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c).

COUNT 7
Sexual Exploitation of Children
18 U.S.C. § 2251(a) and (e)

The Grand Jury further charges:

Beginning in or about June 2014, and continuing until in or about March 2017, in the Northern District of Ohio, Western Division, the defendant, ANTHONY HAYNES, did knowingly employ, use, persuade, induce, entice, and coerce a minor, that is JUVENILE #1, to engage in any sexually explicit conduct for the purpose of producing a visual depiction of that conduct, knowing and having reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce, and that the visual

depiction would be produced or transmitted using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 8
Sexual Exploitation of Children
18 U.S.C. § 2251(a) and (e)

The Grand Jury further charges:

Beginning in or about January 2017, and continuing until in or about March 2017, in the Northern District of Ohio, Western Division, the defendant, CORDELL JENKINS, did knowingly employ, use, persuade, induce, entice, and coerce a minor, that is JUVENILE #1, to engage in any sexually explicit conduct for the purpose of producing a visual depiction of that conduct, knowing and having reason to know that the visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce, and that the visual depiction would be produced or transmitted using materials that had been mailed, shipped, and transported in or affecting interstate or foreign commerce by any means, in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 9
Certain Activities Relating to Material Involving the Sexual Exploitation of Minors
18 U.S.C. § 2252(a)(2)

The Grand Jury further charges:

Beginning in or about January 2017, and continuing until in or about March 2017, in the Northern District of Ohio, Western Division, the defendant, CORDELL JENKINS, did knowingly receive visual depictions using any means or facility of interstate or foreign commerce, that is, a cellular telephone, the production of such visual depictions involved the use

of a minor engaging in sexually explicit conduct, and the visual depictions were of such conduct, in violation of Title 18, United States Code, Section 2252(a)(2).

COUNT 10
Obstruction of Sex Trafficking Investigation
18 U.S.C. § 1591(d)

The Grand Jury further charges:

Beginning on or about March 29, 2017, and continuing until on about April 7, 2017, in the Northern District of Ohio, Western Division, the defendant, ANTHONY HAYNES, obstructed, attempted to obstruct, interfered with, and prevented the enforcement of Title 18, United States Code, Section 1591, by attempting and destroying electronic evidence relating to conduct alleged in Count 2 of this Superseding Indictment, in violation of Title 18, United States Code, Section 1591(d).

COUNT 11
Obstruction of Sex Trafficking Investigation
18 U.S.C. § 1591(d)

The Grand Jury further charges:

On or about October 4, 2017, in the Northern District of Ohio, Western Division, the defendant, KENNETH BUTLER obstructed, attempted to obstruct, interfered with, and prevented the enforcement of Title 18, United States Code, Section 1591, by instructing another person to lie, and lied himself, to law enforcement relating to conduct alleged in Counts 3 and 4 of this Superseding Indictment, in violation of Title 18, United States Code, Section 1591(d).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.