

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA  
  
v.  
  
COREY SMITH.  
  
Defendant.

CRIMINAL NO. 17CR10139

VIOLATIONS:  
18 U.S.C. § 2423(a) – Transportation of a  
Minor for Purposes of Prostitution  
18 U.S.C. § 1591(a) and (b)(1) – Sex  
Trafficking by Force, Fraud, or Coercion  
18 U.S.C. § 2421 – Transportation of an  
Individual for Purposes of Prostitution  
18 U.S.C. §§ 981, 1594, 2428; 28 U.S.C.  
§ 2461 – Criminal Forfeiture Allegation

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

**18 U.S.C. § 2423(a) (Transportation of a Minor for Purposes of Prostitution)**

In or around January 2015 and continuing through in or around March 2015, in the  
Districts of Massachusetts, Connecticut, Georgia, and elsewhere,

**COREY SMITH,**

the defendant herein, did knowingly transport Victim #1, whose identity is known to the Grand  
Jury, who had not attained the age of 18 years, in interstate commerce from Massachusetts to  
Georgia and Connecticut, with the intent that Victim #1 engage in prostitution and in sexual  
activity for which any person can be charged with a criminal offense.

All in violation of 18 U.S.C. §§ 2423(a) and 2.

**COUNT TWO**

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

In or around November 2014 and continuing through in or around June 2015, in the Districts of Massachusetts, Connecticut, and Georgia, and elsewhere,

**COREY SMITH,**

the defendant herein, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, known herein as Victim #2, whose identity is known to the Grand Jury, and did knowingly benefit, financially and by receiving anything of value, from participating in a venture that had engaged in such acts, knowing or in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Victim #2 to engage in a commercial sex act.

All in violation of 18 U.S.C. §§ 1591(a) and (b)(1).

**COUNT THREE**

**18 U.S.C. § 2421 (Transportation of an Individual for Purposes of Prostitution)**

In or around November 2014 and continuing through in or around June 2015, in the Districts of Massachusetts, Georgia, Connecticut and elsewhere,

**COREY SMITH,**

the defendant herein, did knowingly transport an individual, known herein as Victim #2, whose identity is known to the Grand Jury, in interstate commerce between Massachusetts and Connecticut with the intent that Victim #2 engage in prostitution and in sexual activity for which any person can be charged with a criminal offense.

All in violation of 18 U.S.C. §§ 2421 and 2.

**COUNT FOUR**

**18 U.S.C. § 2421 (Transportation of an Individual for Purposes of Prostitution)**

In or around January 2015 and continuing through in or around February 2015, in the Districts of Massachusetts and Connecticut and elsewhere,

**COREY SMITH,**

the defendant herein, did knowingly transport an individual, known herein as Victim #3, whose identity is known to the Grand Jury, in interstate commerce between Massachusetts and Connecticut with the intent that Victim #3 engage in prostitution and in sexual activity for which any person can be charged with a criminal offense.

All in violation of 18 U.S.C. §§ 2421 and 2.

**FORFEITURE ALLEGATIONS**  
**18 U.S.C. §§ 981, 1594, 2428, & 28 U.S.C. § 2461**

The Grand Jury further charges:

1. Upon conviction of one or more of the offenses charged in Counts One through Four of this Indictment,

**COREY SMITH,**

the defendant herein, shall forfeit to the United States, (i) pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to such violations, and (ii) pursuant to 18 U.S.C. §§ 2428 and 1594 (i) any property, real or personal, that was used or intended to be used to commit or facilitate the commission of any such violations, and any property, real or personal, that constitutes or was derived from proceeds obtained, directly or indirectly, as a result of any such violations.

2. If any of the property described in paragraph 1 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 this 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 intention of the United States, pursuant to 18 U.S.C. § 853(p), incorporated by reference in 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the property described in paragraph 1 above.

All pursuant to 18 U.S.C. §§ 981, 1594 and 2428, and 28 U.S.C. § 2461.

A TRUE BILL

*Renee Fisman*  
FOREPERSON OF THE GRAND JURY

*Miranda Hooker*  
MIRANDA HOOKER  
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS; \_\_\_\_\_

Returned into the District by the Grand Jurors and filed

*Kellyann More*  
DEPUTY CLERK  
5-24-17 @ 2:50pm