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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,	)	Criminal No. 1:10-CR-026
	)	
Plaintiff,	)	<b><u>SUPERSEDING INDICTMENT</u></b>
	)	
v.	)	T. 18 U.S.C., Sec. 2
	)	T. 18 U.S.C., Sec. 1591(a)(1)
MERRIDETH JUNE CRANE-HORTON,	)	T. 18 U.S.C., Sec. 1591(a)(2)
a/k/a Mary Crane-Horton,	)	T. 18 U.S.C., Sec. 1591(b)(1)
RAMON D. HEREDIA,	)	T. 18 U.S.C., Sec. 1591(b)(2)
KATHERINE HEREDIA,	)	T. 18 U.S.C., Sec. 1594(a)
a/k/a Katherine Meadows, and	)	T. 18 U.S.C., Sec. 1594(c)
EDWIN NATHAN HORTON,	)	T. 18 U.S.C., Sec. 1951(a)
a/k/a Nate Horton,	)	T. 18 U.S.C., Sec. 1952(a)(3)(A)
	)	T. 18 U.S.C., Sec. 2421
Defendants.	)	

**THE GRAND JURY CHARGES:**

**Introductory Allegations**

1. At all times material hereto, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, KATHERINE HEREDIA, a/k/a Katherine Meadows, and EDWIN NATHAN HORTON, a/k/a Nate Horton, with other persons, resided in a house in the 1300 block of South 30<sup>th</sup> Avenue, Omaha, Nebraska, the specific address of which is known to the Grand Jury.

2. At all times material hereto, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and EDWIN NATHAN HORTON, a/k/a Nate Horton, were wife and husband.

3. At all times material hereto, RAMON D. HEREDIA and KATHERINE HEREDIA,

a/k/a Katherine Meadows, were boyfriend-girlfriend or husband and wife.

4. At all times material hereto, CB was an approximately 18-19 year old adult female, whose identity is known to the Grand Jury.

5. At all times material hereto, MR was an approximately 19 year old adult female, whose identity is known to the Grand Jury.

6. At all times material hereto, SG was an approximately 18-19 year old adult female, whose identity is known to the Grand Jury, and who had an infant child who was only months old.

7. At all times material hereto, ES was a minor female, under the age of 18 years of age, whose identity is known to the Grand Jury, and who was subject to juvenile court intervention and had run away from home.

8. At all times material hereto, YM was a minor female, under the age of 14 years of age, whose identity is known to the Grand Jury, and who had, with ES, run away from home.

9. At all times material hereto, [www.Craigslist.org](http://www.Craigslist.org); [www.backpage.com](http://www.backpage.com); and [www.sipsap.com](http://www.sipsap.com) were internet web sites which engaged in interstate commerce, including the posting of “advertisements” or “solicitations”, and which did business across the state-lines of the State of Iowa, including doing business between the Southern District of Iowa and the State of Nebraska.

10. As used in this Superseding Indictment, the terms “prostitute” and “prostitution” refer to a person engaging in sex acts for money or other things of value, that is, a commercial sex act.

11. As used in this Superseding Indictment, the term “sex act” includes “sex act” as

defined in Title 18, United States Code, Section 2246(2)(A)-(D), inclusive.

**THE GRAND JURY FURTHER CHARGES:**

**Count 1**  
**(Conspiracy to Commit Sex Trafficking)**

1. The Grand Jury realleges and by this reference incorporates herein paragraphs 1-11, inclusive, of the Introductory Allegations of this Superseding Indictment, as though fully set forth herein.

2. Beginning in or about August of 2007, and continuing to in or about June of 2010, the exact dates to the Grand Jury unknown, in and about Council Bluffs in the Southern District of Iowa and elsewhere, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, KATHERINE HEREDIA, a/k/a Katherine Meadows, and EDWIN NATHAN HORTON, a/k/a Nate Horton, did knowingly and willfully combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is:

(1) to knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, one or more persons, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, including among other means those as described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means would be used to cause said person or persons to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1) and 1591(b)(2); and

(2) to knowingly, in and affecting interstate commerce, recruit, entice, harbor,

transport, provide, obtain, and maintain, by any means, one or more persons to engage in a commercial sex act, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years, in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(2); and

(3) to knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person to engage in a commercial sex act, knowing and in reckless disregard of the fact that the person had not attained the age of 14 years, in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1); and

(4) to knowingly benefit, financially and by receiving anything of value, from participation in a venture as defined in Title 18, United States Code, Section 1591(e)(5), which venture was engaged in an act described in Title 18, United States Code, Section 1591(a)(1), as more fully described in subparagraphs (1), (2) and (3) of this Count, immediately above, and by this reference incorporated herein, in violation of Title 18, United States Code, Sections 1591(a)(2), 1591(b)(1) and 1591(b)(2).

#### **Manner and Means**

3. It was a part of the conspiracy that during and in furtherance of the conspiracy, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and EDWIN NATHAN HORTON, a/k/a Nate Horton, early in the conspiracy knowingly exploited vulnerabilities of Katherine Heredia to recruit and entice her to serve as a prostitute, that is to engage in commercial sex acts, on behalf of Defendants MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and EDWIN NATHAN HORTON, a/k/a Nate Horton. Thereafter, during and in furtherance of the conspiracy

and throughout the term of the conspiracy, Defendants MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, aided and abetted by Defendant EDWIN NATHAN HORTON, a/k/a Nate Horton, at times coerced, including by physical and psychological coercion, including among other means coercion as defined in Title 18, United States Code, Section 1591(e)(2), Katherine Heredia to engage in activities which promoted the criminal purposes of the conspiracy, including continuing to serve as a prostitute on behalf of the conspiracy and to assist the other Defendants in the operation of the conspiracy with regard to other females, including MR, SG, ES and YM.

4. It was a part of the conspiracy that during and in furtherance of the conspiracy, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton and RAMON D. HEREDIA, in acts which were either known to or reasonably foreseeable to EDWIN NATHAN HORTON, a/k/a Nate Horton, in the course of the conspiracy, arranged with one or more other persons who also operated prostitution ventures, to at least temporarily combine their independent prostitution ventures, to use the services of Katherine Heredia as a “call-girl” or prostitute, and by which the Defendants received money for commercial sex acts.

5. It was a part of the conspiracy that during and in furtherance of the conspiracy, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, KATHERINE HEREDIA, a/k/a Katherine Meadows, and EDWIN NATHAN HORTON, a/k/a Nate Horton, knowingly exploited respective vulnerabilities of one or more persons, including but not necessarily limited to, CB, MR, SG, ES and YM by which the Defendants intended to and by which the Defendants did isolate, abuse and manipulate CB, MR, SG, ES and YM to recruit and entice, and then coerce them into service to the Defendants as

prostitutes. Said exploitation and coercion of CB, MR, SG, ES and YM included, among other actions:

(a) the Defendants enticing MR, SG, ES and YM to reside with or under the control of the Defendants, and, regarding MR and ES, to leave their respective family or other place in which they were receiving care and nurture, and;

(b) the Defendants MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton and RAMON D. HEREDIA, severely, verbally berating KATHERINE MEADOWS, MR and SG to convince them that they were not fit for anything other than prostitution;

(c) the Defendants, especially RAMON D. HEREDIA and MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, exploiting strong feelings of affection which MR had for RAMON D. HEREDIA, in spite of RAMON D. HEREDIA's abuse of MR;

(d) the Defendants exploiting SG's need to support her infant child without other resources to do so;

(e) the Defendants threatening SG with the loss of her infant child through action of law if SG went to law enforcement and otherwise did not do as the Defendants told SG to do;

(f) the Defendants, especially MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, encouraging ES to abscond from supervision by a juvenile court and come to live with the Defendants;

(g) the Defendants engaging in threats of serious harm to or physical restraint against MR, SG, ES and YM, which included, among other acts:

(1) the Defendants causing MR, SG, ES and YM to live at the Defendants' residence or at a nearby apartment controlled by the Defendants;

(2) the Defendants restricting MR, SG, ES and YM to living in conditions closely controlled by the Defendants, including, among other restrictions: the living quarters in which MR, SG, ES and YM were domiciled, their freedom in leaving the restricted living quarters, their access to money by which to secure ordinary needs of daily living, access to a telephone other than in the immediate course of service as a prostitute, and access to freedom of travel and a mode of transportation;

(3) the Defendants making specific threats of serious harm against MR and SG;

(h) the Defendants engaging in a scheme, plan, or pattern intended to cause one or more persons, including, but not necessarily limited to MR, SG, ES and YM, to believe that failure to continue to serve as a prostitute for the Defendants would result in serious harm to or physical restraint respectively against said persons, which included among other acts:

(1) the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, physically assaulted KATHERINE HEREDIA, a/k/a Katherine Meadows, at times resulting in physical injury, in the presence of MR and SG to frighten and intimidate MR and SG to coerce them to remain serving in their prostitution venture as prostitutes, that is, performing commercial sex acts to the financial benefit of the Defendants.

(2) the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows, physically assaulted MR in the presence of SG to frighten and intimidate SG and coerce SG to remain serving in their prostitution venture as a prostitute, that is, performing commercial sex acts to the financial benefit of the Defendants;

(i) the Defendants engaging in the abuse or threatened abuse of law or the legal process, particularly in that:

(1) the Defendants advised SG that she would lose her minor child if she did not continue in the service of the Defendants as a prostitute, that is engaging in commercial sex acts to the financial benefit of the Defendants, and if SG discussed with law enforcement personnel regarding what was happening to SG while with and under the control of the Defendants;

(2) the Defendants advised ES and YM that they would be taken into custody by juvenile authorities if they did not perform acts of prostitution, that is commercial sex acts, for the Defendants.

(j) the Defendants, especially MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton and RAMON D. HEREDIA, recruiting and enticing CB to engage in prostitution for the Defendants, by professing RAMON D. HEREDIA's strong feelings of affection for CB, and by exploiting CB's strong feelings of affection for RAMON D. HEREDIA.

6. It was a part of the conspiracy that during the term of the conspiracy and in furtherance thereof, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows, physically assaulted MR.

7. It was a part of the conspiracy that during the term of the conspiracy and in furtherance thereof, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows, did knowingly photograph and by means of one or more computers post on various internet web

sites, including among others those referred to in this Superseding Indictment, photographs of females, including at least KATHERINE HEREDIA, a/k/a Katherine Meadows, CB, MR, SG and ES, with the intent that said postings serve as solicitations for said females to engage in prostitution.

8. It was a part of the conspiracy that during the term of the conspiracy and in furtherance thereof, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, KATHERINE HEREDIA, a/k/a Katherine Meadows, and EDWIN NATHAN HORTON, a/k/a Nate Horton, did knowingly set prices for and collect and receive money for the performance of sex acts by females, including at least KATHERINE HEREDIA, a/k/a Katherine Meadows, CB, MR, SG and ES, serving as prostitutes for the Defendants.

9. It was a part of the conspiracy that during the term of the conspiracy and in furtherance thereof, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, KATHERINE HEREDIA, a/k/a Katherine Meadows, and EDWIN NATHAN HORTON, a/k/a Nate Horton, did knowingly purchase for, including at times purchases made in and about Council Bluffs, Iowa, and did provide to females serving for the Defendants as prostitutes, including at least CB, SG, MR and ES, clothing, condoms, and other items, including items for daily living, to maintain control over them and to facilitate their service as prostitutes, that is to engage in commercial sex acts, on behalf of the Defendants.

10. It was a part of the conspiracy that during the term of the conspiracy and in furtherance thereof, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows, did knowingly persuade, induce, entice and coerce one or more persons, including at

least KATHERINE HEREDIA, a/k/a Katherine Meadows, CB, MR and SG, to travel in interstate commerce, that is, between Nebraska and Iowa to engage in prostitution.

11. It was further a part of the conspiracy that during the term of the conspiracy and in furtherance thereof, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows, did knowingly transport one or more individuals, including at least KATHERINE HEREDIA, a/k/a Katherine Meadows, CB, SG and MR, in interstate commerce, that is, between the Southern District of Iowa and Nebraska, to engage in commercial sex acts.

12. It was further a part of the conspiracy that during the term of the conspiracy and in furtherance thereof, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows, did knowingly use various cell phones, including disposable phones, with numbers known and unknown to the Grand Jury, to maintain contact with the various females serving as prostitutes for the Defendants, including especially contact when said females were about to engage in a "prostitution appointment" and at the conclusion of a "prostitution appointment".

13. It was a part of the conspiracy that during and in furtherance of the conspiracy the Defendants, especially Defendants MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows, used the solicitations of the prostitution business to lure unsuspecting males into situations in which the males were then by force or threat of force robbed or extorted, including on one or more occasions causing an adult male to travel in interstate commerce for such purpose.

14. It was a part of the conspiracy that during the term of the conspiracy and in

furtherance thereof the Defendants carried out these various manner and means of the conspiracy both in Nebraska and in the Southern District of Iowa, at times engaging in interstate commerce between Nebraska and Iowa and using and causing the use of facilities of interstate commerce, including the internet and cell phones in and between Nebraska and the Southern District of Iowa.

15. It was a part of the conspiracy that during and in furtherance of the conspiracy, Defendant EDWIN NATHAN HORTON, a/k/a Nate Horton, while periodically assisting in the daily operation of the conspiracy, mainly assisted other Defendants in recruiting and enticing people to serve as prostitutes in the conspiracy; procured and assisted other Defendants in procuring physical resources for the operation of the conspiracy; and received and assisted in receipt, storage and disposition of money received from commercial sex acts performed during and in furtherance of the conspiracy, that is, did benefit financially from commercial sex acts performed during and in furtherance of the conspiracy. The Defendant, EDWIN NATHAN HORTON, a/k/a Nate Horton, did at times:

(a) knowingly join directly in the activities of the conspiracy performed during and in furtherance of the conspiracy; and

(b) knowingly aid and abet the activities of the conspiracy; and

(c) have reasonable foreseeability of the manner and means of carrying out the conspiracy, including the manner and means stated in paragraphs 3 - 14, including subparagraphs, inclusive, above, during and in furtherance of the conspiracy and while EDWIN NATHAN HORTON, a/k/a Nate Horton was a member of the conspiracy.

### Overt Acts

16. In furtherance of the conspiracy, and to achieve its objects, the Defendants MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, KATHERINE HEREDIA, a/k/a Katherine Meadows, and EDWIN NATHAN HORTON, a/k/a Nate Horton, knowingly and willfully committed, aided and abetted, and caused to be committed the following overt acts, among others, in the Southern District of Iowa and elsewhere, beginning in or about August of 2007, and continuing to on or about June 24, 2010.

16.1 In or about August of 2007, Defendants MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and EDWIN NATHAN HORTON, a/k/a Nate Horton, recruited and enticed KATHERINE HEREDIA, a/k/a Katherine Meadows, to serve as a prostitute for the conspiracy, continuing throughout the term of the conspiracy, and including at times traveling in interstate commerce between Nebraska and the Southern District of Iowa for the purpose of performing commercial sex acts for and on behalf of the conspiracy.

16.2 From in or about August of 2007, and continuing to in or about October of 2007, Defendants MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and EDWIN NATHAN HORTON, a/k/a Nate Horton, rented one or more motel rooms in Omaha, Nebraska, from which they operated the prostitution venture, including KATHERINE HEREDIA, a/k/a Katherine Meadows, serving as a prostitute for the conspiracy, and from which MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and EDWIN NATHAN HORTON, a/k/a Nate Horton, received money for commercial sex acts.

16.3 The Defendants repeatedly, physically assaulted MR, and encouraged other persons to assault MR.

16.4 The Defendants repeatedly, verbally and emotionally assaulted and berated MR.

16.5 MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, aided and abetted by EDWIN NATHAN HORTON, a/k/a Nate Horton, repeatedly, physically assaulted or threatened KATHERINE HEREDIA, a/k/a Katherine Meadows with physical assault.

16.6 During and in furtherance of the conspiracy and after the arrest of MR in Omaha, Nebraska, for prostitution, the Defendants caused MR to lie to MR's supervising probation officer regarding among other things MR's continuing involvement with the Defendants in the Defendants' prostitution, that is, commercial sex act venture, and MR's rental of an apartment under the conditions of her release from custody by a State Court.

16.7 In or about late October of 2008, the Defendants, especially MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, recruited and enticed CB to serve as a prostitute for the Defendants.

(a) in or about late October of 2008, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, took photographs of CB and posted said photographs on one or more web sites to solicit clients for prostitution;

(b) in or about late October of 2008, at the direction of MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, CB engaged in commercial sex acts for the financial benefit of the Defendants;

(c) in or about late October of 2008, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, transported CB in interstate commerce, from Omaha, Nebraska, to Council Bluffs, Iowa, to:

(1) attempt to engage in a commercial sex act, in which CB did attempt to engage, and for which CB received money, most of which money went to the benefit of the Defendants; and

(2) engage in a commercial sex act, in which sex act CB did engage, and for which CB received money, most of which money went to the benefit of the Defendants;

(d) after CB left the service of the Defendants in the performance of commercial sex acts for the financial benefit of the Defendants MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA attempted to coerce and entice CB to return to their service in the performance of commercial sex acts.

16.8 On or about March 28, 2009, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows, used an internet web site solicitation for their prostitution venture, and caused an adult male, whose identity is known to the Grand Jury, to travel in interstate commerce from Council Bluffs, Iowa, to a motel in Omaha, Nebraska, luring the adult male into the motel, and there taking money and other property from him by force, including assault, and threat of force, and thereafter released the adult male to return to Iowa only under the coercion that the adult male would on the next bank business day remove significant money from the adult male's bank account and give it to the Defendants.

16.9 During 2009, Defendants MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, aided and abetted by Defendant KATHERINE HEREDIA, a/k/a Katherine Meadows, acting for the conspiracy, purchased a series of vehicles from a vehicle dealer in the Omaha vicinity, which vehicles were used to carry out various acts of the conspiracy, including but not limited to transportation of prostitutes to appointments to perform commercial sex acts for the financial benefit of the Defendants, including transportation in interstate commerce between Nebraska and the Southern District of Iowa. During and in the course of the relationship between the Defendants and an employee of the vehicle dealership, and in furtherance of the conspiracy, the following, among other acts, occurred:

(a) in 2009, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, took photographs of KATHERINE HEREDIA, a/k/a Katherine Meadows, and another female posing in bikinis on a Mercedes automobile belonging to the dealership, which photographs were to be used to solicit prostitution for the conspiracy;

(b) in or about December of 2009, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton and KATHERINE HEREDIA, a/k/a Katherine Meadows, solicited an employee of the vehicle dealership to engage in a commercial sex act, in which the employee engaged with KATHERINE HEREDIA, a/k/a Katherine Meadows, for the financial benefit of the Defendants;

(c) on or about February 5, 2010, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, solicited an employee of the dealership to accept a sex act with KATHERINE HEREDIA, a/k/a Katherine Meadows, and another female serving as a prostitute for the conspiracy, in exchange for the employee making a monthly payment to the

dealership on a vehicle purchased from the dealership by the Defendants and being used by the conspiracy. The employee engaged in the sex act with KATHERINE HEREDIA, a/k/a Katherine Meadows, and the other female, and made the approximately \$250.00 monthly payment, which payment constituted a financial benefit to the Defendants.

16.10 In or about July of 2009, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, while Katherine Heredia was approximately seven months pregnant, threatened Katherine Heredia with serious harm and the killing of the baby Katherine Heredia was carrying.

16.11 On or about December 5, 2009, the Defendants, including especially MEREDITH CRANE HORTON, a/k/a Mary Crane Horton, arranged for a prostitution appointment for MR, transported MR from Omaha, Nebraska, to Council Bluffs, Iowa, and received money for an appointment to last up to 24 hours, for MR to perform a commercial sex act with an adult male, whose identity is known to the grand jury.

16.12 On or about December 14, 2009, the Defendants, using MR's name fraudulently, rented an apartment in the 3100 block of Poppleton Street, Omaha, Nebraska, the specific address of which is known to the Grand Jury, thereafter using said apartment for the housing of various females engaged in the Defendants' prostitution venture, for the performance of commercial sex acts on behalf of the Defendants' prostitution venture, and for taking some of the photographs of females engaged in the Defendants' prostitution venture, including MR, SG and ES, for posting to internet web sites to solicit clients for the Defendants' prostitution venture.

16.13 In or about December of 2009, the Defendants, especially MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, encouraged ES to run away from home and

to abscond from the juvenile court intervention in which ES was then engaged.

16.14 Between December 29, 2009, and January 2, 2010, the Defendants maintained ES and YM in the apartment the Defendants rented in the 3100 block of Poppleton Street, Omaha, Nebraska, and warned ES and YM that they could not leave the apartment without one of the Defendants escorting them, and that they were not to be at the windows of the apartment, with the Defendants leaving ES and YM without a key, such that the apartment door would lock behind them if they left without one of the Defendants.

16.15 Between December 29, 2009, and January 2, 2010, the Defendants, especially MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, threatened ES and YM with physical harm, including telling them about arsons and murders, and including, among other threats, telling ES that the Defendants knew where she (ES) lived.

16.16 On or about January 1, 2010, the Defendants arranged for and coerced ES, then fifteen (15) years of age, to engage in commercial sex acts with one or more adult males, the identity of at least one of whom is known to the Grand Jury, in and about Omaha, Nebraska, for which the Defendants received money.

16.17 On or about January 1, 2010, the Defendants arranged for and attempted to coerce YM, then thirteen (13) years of age, to engage in commercial sex acts with an adult male, whose identity is known to the Grand Jury, in and about Omaha, Nebraska, which commercial sex act never occurred because ES and YM, in fear of the Defendants and not wanting to serve as prostitutes, including for the Defendants, stole a motor vehicle and fled from the Omaha, Nebraska-Council Bluffs, Iowa vicinity.

16.18 On or about January 12, 2010, the Defendants, especially RAMON D.

HEREDIA, added SG to the lease of the Defendants' apartment in the 3100 block of Poppleton Street, Omaha, Nebraska.

16.19 During the time MR was residing with or otherwise under the control of the Defendants during and in furtherance of the conspiracy which included MR performing commercial sex acts to the financial benefit of the Defendants, MR attempted to escape from the Defendants after providing services as a prostitute, but the Defendants physically and by threat of force coerced MR to return with them and continue serving as a prostitute in Defendants' prostitution venture, until in or about early January of 2010, when MR, following court intervention, successfully separated from the Defendants and sought refuge with members of MR's family.

16.20 Beginning in or about January of 2010, an adult male whose identity is known to the Grand Jury, engaged in commercial sex acts with KATHERINE HEREDIA, a/k/a Katherine Meadows, during and in furtherance of the conspiracy:

(a) said adult male "found" KATHERINE HEREDIA, a/k/a Katherine Meadows, on the internet at web sites on which the Defendants in furtherance of the conspiracy had posted solicitations for prostitution, including solicitations for prostitution by KATHERINE HEREDIA, a/k/a Katherine Meadows;

(b) at the beginning of the prostitution relationship between said adult male and KATHERINE HEREDIA, a/k/a Katherine Meadows, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, transported KATHERINE HEREDIA, a/k/a Katherine Meadows, from Omaha, Nebraska, to Council Bluffs in the Southern District of Iowa, to engage in a commercial sex act, in which commercial sex act KATHERINE HEREDIA, a/k/a Katherine

Meadows, did engage in Council Bluffs, to the financial benefit of the Defendants;

(c) thereafter, said adult male continued to contact KATHERINE HEREDIA, a/k/a Katherine Meadows, and to engage in commercial sex acts, both in Council Bluffs, Iowa, and in and about Omaha, Nebraska , all to the financial benefit of the Defendants;

(d) said adult male continued to find solicitations regarding KATHERINE HEREDIA, a/k/a Katherine Meadows, on-line at web sites until at least on or about June 1, 2010.

16.21 In or about January of 2010, RAMON D. HEREDIA by telephone variously attempted to entice and verbally threatened MR and some of her family, after MR had broken off contact with the Defendants and left the Defendants' prostitution venture.

16.22 From on or about January 18, 2010, to on or about January 20, 2010, the Defendants, including especially RAMON D. HEREDIA, sent over 100 text messages to MR, many of which text messages were threatening, intimidating and berating of MR.

16.23 On or about January 21, 2010, the Defendants arranged for, directed, and MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA transported SG from Omaha, Nebraska, to Council Bluffs, Iowa, to engage in a commercial sex act with an adult male, which adult male, unknown to the Defendants and SG, was in reality an undercover law enforcement officer conducting a "prostitution sting".

16.24 On or about January 21, 2010, after the arrests in Council Bluffs, Iowa, of SG, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, for prostitution, pandering and pimping, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, on one or more occasions threatened SG with harm if she talked to law enforcement about the Defendants' prostitution business.

16.25 In or about late January of 2010, the Defendants, especially MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, put out a warning to other prostitutes and persons using the services of prostitutes to be careful of a 712-area code telephone number [the telephone number used by undercover law enforcement officers to operate a “sting operation” regarding prostitutes in Council Bluffs, Iowa].

16.26 On or about February 10, 2010, SG, in the company of and being directed by MEREDITH CRANE-HORTON, a/k/a Mary Crane-Horton, terminated the Defendants’ leasehold, which had been in the names of MR and SG, of the apartment in the 3100 block Poppleton Street, Omaha, Nebraska.

16.27 In or about February of 2010, following SG’s arrest for prostitution in Omaha, Nebraska, while SG was in the service of the Defendants in their prostitution venture, the Defendants bonded SG out of jail in Douglas County, Nebraska, and threatened SG if she did not keep quiet regarding the Defendants’ prostitution venture.

16.28 During the respective period of time each of MR, SG, ES and YM were residing with or otherwise under the control of the Defendants during and in furtherance of the conspiracy, the Defendants denied each MR, SG, ES and YM access to a telephone or other means of outside communication, other than in the immediate provision of services as a prostitute on behalf of the Defendants.

16.29 During the respective period of time each of CB, MR, SG, ES and YM were subject to the control of the Defendants during and in furtherance of the conspiracy, the Defendants continuously arranged for, transported to and from, and received money for commercial sex acts by CB, MR, SG and ES, and Defendant KATHERINE HEREDIA, a/k/a

Katherine Meadows, which sex acts were performed in and about Omaha, Nebraska, Council Bluffs, Iowa, and other locations.

16.30 During the term of the conspiracy and in furtherance thereof, the Defendants virtually daily used and caused the use of the internet to carry out their commercial sex act venture. Included among the uses of the internet made and caused by the Defendants during and in furtherance of the conspiracy were the following:

a. the Defendants posted and ran solicitations over a facility of interstate commerce, that is, the internet, by which the Defendants promoted their prostitution venture, that is, commercial sex act venture. These solicitations regularly advertised services to be provided in Omaha and Bellevue [both Nebraska], and Council Bluffs [Iowa], and at times included other locations;

b. the Defendants' internet web site postings routinely solicited potential "clients" to use a facility of interstate commerce, that is, telephone, cell phone, or occasionally the internet, to arrange for the prostitution "service" provided by the Defendants;

c. at times, "clients" of the Defendants' prostitution venture, that is commercial sex act venture, used the internet to post "reviews" of the prostitutes serving the Defendants, including especially KATHERINE HEREDIA, a/k/a Katherine Meadows, MR and SG;

d. the web sites to which the Defendants posted internet solicitations included, but are not necessarily limited to [www.Craigslist.org](http://www.Craigslist.org); [www.backpage.com](http://www.backpage.com); [www.sipsap.com](http://www.sipsap.com); [naughtynightlife.com](http://naughtynightlife.com).

e. the uses of the internet made or caused by the Defendants included, but

were not limited to, the following:

<u>Item</u>	<u>Service</u>	<u>Posting #</u>	<u>Date</u>	<u>Phone No.</u>	<u>Locale</u>
Zoey's Escort Reviews	naughtynightlife	-----	9/29/09	-----	-----
Zoey's Escort Reviews	naughtynightlife	-----	10/4/09	-----	-----
Pretty	craigslist	1414652506	10/9/09	402.578.8619	Omaha-Cb- Bell
Trick -n- Treat	craigslist	1418744612	10/12/09	402.312.0368	Omaha-CB- Surrounding
Hanna the blonde goddess	backpage	-----	10/12/09	402.312.0368	Oma-Cb- Elk-Bla-Fre- Linc-cabs
Sweet Like Candy	craigslist	1422312927	10/15/09	402.578.8619	Om-Cb-Belle
Zoey	naughtynightlife	-----	10/19/09	402.312.0368	Omaha, Council Bluffs, Bellevue, Lavista, Elkhorn, Lincoln, Blair, Fremont, Cabs
++A Plus Super Special Girl	craigslist	1426102142	10/17/09	402.578.8619	Oma Areas
[Hanna]	sipsap	-----	10/18/09	Yahoo Messenger	Omaha- Council Bluffs Lincoln
HotHannah	sipsap	-----	10/18/09	"Click"	-----

<u>Item</u>	<u>Service</u>	<u>Posting #</u>	<u>Date</u>	<u>Phone No.</u>	<u>Locale</u>
Sweet young blond	backpage	2192936	1/10/10	402.708.3511	Omaha-Sarpy-Council Bluffs (Other adds)
Sweet Playful Blonde	craigslist	1560775396	1/10/10	402.578.8619 402.312.0368	Omaha-Bell-Cb
Candie Canes	craigslist	1560772230	1/19/10	402.578.8619	Omaha-Bell-Cb- Cabs
Sweet Playful Blonde	craigslist	1562278134	1/21/10	402.578.8619	Omaha-Bell-Cb, Ia
Brunette	craigslist	1584384707	2/3/10	402.415.6821	Omaha Area
Sexy Sweet Brunette All 4 U	backpage	2170764	2/3/10	402.415.6821	Oma -Cabs - Sarpy-Council Bluffs (Other adds)
Brunette (Omaha Area)	craigslist	1584532706	2/3/10	402.415.6821	Omaha Area
Sweet Intense Wild	backpage	1654617	2/7/10	402.708.3511	Oma/Cabs [but shows Omaha-Sarpy-Council Bluffs]
Sweet Intense Wild	backpage	1654617	2/7/10	402.708.3511	Omaha-Sarpy-Council Bluffs (Other adds)
Sexy Sweet Brunette All 4 U	backpage	2170764	2/9/10	402.708.3511	Omaha-Sarpy-Council Bluffs (Other adds)
Sexy Sweet Brunette	backpage	2170764	2/26/10	402.708.3511	Omaha- Sarpy Council Bluffs (Other ads)

<u>Item</u>	<u>Service</u>	<u>Posting #</u>	<u>Date</u>	<u>Phone No.</u>	<u>Locale</u>
Smiles	craigslist	1622297166	2/28/10	402.708.3511	Omaha
[SG]	Escorts.com	2639559	2010	"Click"	-----

This is a violation of Title 18, United States Code, Section 1594(c).

**THE GRAND JURY FURTHER CHARGES:**

**Count 2**

**(Engaging in and Attempting to Engage in Sex Trafficking)**

1. The Grand Jury realleges and by this reference incorporates herein, paragraphs 1-11, inclusive, of the Introductory Allegations of this Superseding Indictment, as though fully set forth herein.

2. The Grand Jury realleges and by this reference incorporates herein, paragraphs 2-16, and subparagraphs thereof, inclusive, of Count 1, above, of this Superseding Indictment, as though fully set forth herein.

3. On or about December 5, 2009, in and about Council Bluffs in the Southern District of Iowa and elsewhere, the Defendants MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, KATHERINE HEREDIA, a/k/a Katherine Meadows, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, that is, MR, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, including among other means those described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means were used and would be used to cause MR to engage in a commercial sex act, in that, as a part of the conspiracy set forth in Count 1 of this Superseding Indictment, the Defendants

transported and caused MR to be transported from Omaha, Nebraska, to Council Bluffs, Iowa, to engage in a commercial sex act in Council Bluffs.

4. The above violation was committed and carried out in the course of and in furtherance of the conspiracy set forth in Count 1 of this Superseding Indictment, while MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows was each a member of the conspiracy charged in Count 1 of this Superseding Indictment, and while the Defendant, EDWIN NATHAN HORTON, a/k/a Nate Horton was a member of the conspiracy, and which Engaging in and Attempting to Engage in Sex Trafficking was reasonably foreseeable to and, therefore, attributable to EDWIN NATHAN HORTON, a/k/a Nate Horton, as a violation of Title 18, United States Code, Sections 1591(a)(1) and 1594(a).<sup>1</sup>

This is a violation of Title 18, United States Code, Sections 1591(a)(1), 1594(a), 2, 1591(b)(1) and 1591(b)(2).

**THE GRAND JURY FURTHER CHARGES:**

**Count 3**  
**(Interstate Transportation for Prostitution)**

1. On or about December 5, 2009, in and about Council Bluffs in the Southern District of Iowa and elsewhere, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows, did knowingly and willfully transport any individual, that is, MR, in interstate commerce, that is from Omaha, Nebraska, to Council Bluffs, Iowa, with the intent that such

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<sup>1</sup> Pinkerton v. United States, 328 U.S. 640 (1946)

individual engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

2. The above violation was committed and carried out in the course of and in furtherance of the conspiracy set forth in Count 1 of this Superseding Indictment, which is by this reference incorporated herein as though set forth herein in full, while MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows was each a member of the conspiracy charged in Count 1 of this Superseding Indictment, and while the Defendant, EDWIN NATHAN HORTON, a/k/a Nate Horton was a member of the conspiracy, and which Interstate Transportation for Prostitution was reasonably foreseeable to and, therefore, attributable to EDWIN NATHAN HORTON, a/k/a Nate Horton, as a violation of Title 18, United States Code, Section 2421.<sup>2</sup>

This is a violation of Title 18, United States Code, Sections 2421 and 2.

**THE GRAND JURY FURTHER CHARGES:**

**Count 4**  
**(Engaging in and Attempting to Engage in Sex Trafficking)**

1. The Grand Jury realleges and by this reference incorporates herein, paragraphs 1-11, inclusive, of the Introductory Allegations of this Superseding Indictment, as though fully set forth herein.

2. The Grand Jury realleges and by this reference incorporates herein, paragraphs 2-16, and subparagraphs thereof, inclusive, of Count 1, above, of this Superseding Indictment, as though fully set forth herein.

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<sup>2</sup> Pinkerton v. United States, 328 U.S. 640 (1946)

3. On or about January 21, 2010, in and about Council Bluffs in the Southern District of Iowa and elsewhere, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, that is, SG, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, including among other means those described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means were used and would be used to cause and attempt to cause SG to engage in a commercial sex act, in that, as a part of the conspiracy set forth in Count 1 of this Superseding Indictment, the Defendants transported and caused SG to be transported from Omaha, Nebraska, to Council Bluffs, Iowa, to engage in a commercial sex act in Council Bluffs.

4. The above violation was committed and carried out in the course of and in furtherance of the conspiracy set forth in Count 1 of this Superseding Indictment, while MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows was each a member of the conspiracy charged in Count 1 of this Superseding Indictment, and while the Defendant, EDWIN NATHAN HORTON, a/k/a Nate Horton was a member of the conspiracy, and which Engaging in and Attempting to Engage in Sex Trafficking was reasonably foreseeable to and, therefore, attributable to EDWIN NATHAN HORTON, a/k/a Nate Horton, as a violation of Title 18, United States Code, Sections 1591(a)(1) and 1594(a).<sup>3</sup>

This is a violation of Title 18, United States Code, Sections 1591(a)(1), 1594(a), 2, 1591(b)(1) and 1591(b)(2).

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<sup>3</sup> Pinkerton v. United States, 328 U.S. 640 (1946)

**THE GRAND JURY FURTHER CHARGES:**

**Count 5**  
**(Interstate Transportation for Prostitution)**

1. On or about January 21, 2010, in and about Council Bluffs in the Southern District of Iowa and elsewhere, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows, did knowingly and willfully transport any individual, that is, SG, in interstate commerce, that is, from Omaha, Nebraska, to Council Bluffs, Iowa, with the intent that such individual engage in prostitution and in any sexual activity for which any person can be charged with a criminal offense.

2. The above violation was committed and carried out in the course of and in furtherance of the conspiracy set forth in Count 1 of this Superseding Indictment, which is by this reference incorporated herein as though set forth herein in full, while MERRIDETH JUNE CRANE-HORTON, a/k/a

Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows was each a member of the conspiracy charged in Count 1 of this Superseding Indictment, and while the Defendant, EDWIN NATHAN HORTON, a/k/a Nate Horton was a member of the conspiracy, and which Interstate Transportation for Prostitution was reasonably foreseeable to and, therefore, attributable to EDWIN NATHAN HORTON, a/k/a Nate Horton, as a violation of Title 18, United States Code, Section 2421.<sup>4</sup>

This is a violation of Title 18, United States Code, Sections 2421 and 2.

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<sup>4</sup> Pinkerton v. United States, 328 U.S. 640 (1946)

**THE GRAND JURY FURTHER CHARGES:**

**Count 6**

**(Use of the Internet in Aid of Unlawful Activity)**

1. The Grand Jury realleges and by this reference incorporates herein, paragraphs 1-11, inclusive, of the Introductory Allegations of this Superseding Indictment, as though fully set forth herein.

2. The Grand Jury realleges and by this reference incorporates herein, paragraphs 2-16, and subparagraphs thereof, inclusive, of Count 1, above, of this Superseding Indictment, as though fully set forth herein.

3. On or about January 21, 2010, in and about Council Bluffs in the Southern District of Iowa and elsewhere, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows, did knowingly and willfully use and cause the use of a facility in interstate commerce, that is, the internet, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to-wit, a venture involving prostitution, that is, engaging in commercial sex acts, in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2), and 2422(a), in that the Defendants posted and caused to be posted on craigslist.org a solicitation seeking appointments for prostitution, which solicitation expressly advertised that the service was available to “Omaha, Bell and Cb, Ia” [Council Bluffs, Iowa], and thereafter performed and attempted to perform one or more acts to promote, manage, establish, carry on and facilitate the promotion, management, establishment, and carrying on of said unlawful activity, including among other acts: telephone communications

to arrange and carry out the prostitution appointment; traveling in interstate commerce into the Southern District of Iowa, from Nebraska, with SG under the control of Defendants MERRIDETH JUNE CRANE- HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA; and delivering SG to the “appointment” to provide the solicited prostitution service, that is a commercial sex act, all as more fully described in Counts 4, 5, 7 and 8 of this Superseding Indictment, by this reference incorporated herein.

4. The above violation was committed and carried out in the course of and in furtherance of the conspiracy set forth in Count 1 of this Superseding Indictment, while MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and KATHERINE HEREDIA, a/k/a Katherine Meadows was each a member of the conspiracy charged in Count 1 of this Superseding Indictment, and while the Defendant, EDWIN NATHAN HORTON, a/k/a Nate Horton was a member of the conspiracy, and which Use of the Internet in Aid of Unlawful Activity was reasonably foreseeable to and, therefore, attributable to EDWIN NATHAN HORTON, a/k/a Nate Horton, as a violation of Title 18, United States Code, Section 1952(a)(3)(A).<sup>5</sup>

This is a violation of Title 18, United States Code, Section 1952(a)(3)(A).

**THE GRAND JURY FURTHER CHARGES:**

**Count 7**

**(Use of the Telephone/Cell Phone in Aid of Unlawful Activity)**

1. The Grand Jury realleges and by this reference incorporates herein, paragraphs 1-11, inclusive, of the Introductory Allegations of this Superseding Indictment, as though fully set forth

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<sup>5</sup> Pinkerton v. United States, 328 U.S. 640 (1946)

herein.

2. The Grand Jury realleges and by this reference incorporates herein, paragraphs 2-16, and subparagraphs thereof, inclusive, of Count 1, above, of this Superseding Indictment, as though fully set forth herein.

3. On or about January 21, 2010, in and about Council Bluffs in the Southern District of Iowa and elsewhere, the Defendant, KATHERINE HEREDIA, a/k/a Katherine Meadows, did knowingly and willfully use and cause the use of a facility in interstate commerce, that is, one or more telephones or cell phones, including the numbers 402.578.XXXX and 402.312.XXXX, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to-wit, a venture involving prostitution, that is, commercial sex acts, in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2) and 2422(a), in that the Defendant used said phones in Omaha, Nebraska, regarding a person unknown to the Defendant to be an undercover Council Bluffs Police Officer in Council Bluffs, Iowa, seeking an appointment for prostitution in a law enforcement "sting operation"; and thereafter the Defendant performed and attempted to perform one or more acts to promote, manage, establish, carry on and facilitate the promotion, management, establishment, and carrying on of said unlawful activity, including among other acts: participating in a call from the undercover Officer to set up the prostitution appointment; aiding and abetting the travel in interstate commerce of the other Defendants, with SG under said other Defendants' control, into the Southern District of Iowa, from Nebraska, to provide the solicited prostitution service, that is, commercial sex act as more fully described in Counts 4, 5, 6 and 8 of this Superseding Indictment, by this reference incorporated herein; and calling the undercover Officer to confirm

the location in Council Bluffs at which the prostitution service was to be performed.

4. The above violation was committed and carried out in the course of and in furtherance of the conspiracy set forth in Count 1 of this Superseding Indictment, while KATHERINE HEREDIA, a/k/a Katherine Meadows was a member of the conspiracy charged in Count 1 of this Superseding Indictment, and while the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and EDWIN NATHAN HORTON, a/k/a Nate Horton were members of the conspiracy, and which use of a communication facility was reasonably foreseeable to MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA, and EDWIN NATHAN HORTON, a/k/a Nate Horton, and, therefore, attributable to MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, RAMON D. HEREDIA and EDWIN NATHAN HORTON, a/k/a Nate Horton as a violation of Title 18, United States Code, Section 1952(a)(3)(A)<sup>6</sup>

This is a violation of Title 18, United States Code, Sections 1952(a)(3)(A) and 2.

**THE GRAND JURY FURTHER CHARGES:**

**Count 8**

**(Use of the Telephone/Cell Phone in Aid of Unlawful Activity)**

1. The Grand Jury realleges and by this reference incorporates herein, paragraphs 1-11, inclusive, of the Introductory Allegations of this Superseding Indictment, as though fully set forth herein.

2. The Grand Jury realleges and by this reference incorporates herein, paragraphs 2-16, and subparagraphs thereof, inclusive, of Count 1, above, of this Superseding Indictment, as

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<sup>6</sup> Pinkerton v. United States, 328 U.S. 640 (1946)

though fully set forth herein.

3. On or about January 21, 2010, in and about Council Bluffs in the Southern District of Iowa and elsewhere, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, did knowingly and willfully use and cause the use of a facility in interstate commerce, that is, a cell phone with the number 402.909.XXXX, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, travel in interstate commerce for prostitution and to carry out a commercial sex act venture, in violation of Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2) and 2422(a), in that, consistent with the established protocol of the conspiracy, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA gave cell phone number 402.909.XXXX to SG to use to contact the Defendants during and in relation to the “prostitution appointment” in Council Bluffs, Iowa; and thereafter performed and caused the performance of one or more acts to promote, manage, establish, carry on and facilitate the promotion, management, establishment, and carrying on of said unlawful activity, including among other acts: SG texting MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton and RAMON D. HEREDIA on cell phone number 402.686.XXXX at the initiation of said “prostitution appointment” to advise said Defendants that SG was “okay” and that the “client” had the money, with MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton and RAMON D. HEREDIA then waiting at a nearby location in Council Bluffs for the Appointment to end, so they could retrieve SG; obtain from SG the money to have been paid by the “client” for a commercial sex act; and, with SG in their control, return to Omaha, Nebraska.

4. The above violation was committed and carried out in the course of and in furtherance of the conspiracy set forth in Count 1 of this Superseding Indictment, while MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton and RAMON D. HEREDIA were members of the conspiracy charged in Count 1 of this Superseding Indictment, and while the Defendants, KATHERINE HEREDIA, a/k/a Katherine Meadows and EDWIN NATHAN HORTON, a/k/a Nate Horton, were members of the conspiracy, and which use of a communication facility was reasonably foreseeable to KATHERINE HEREDIA, a/k/a Katherine Meadows and EDWIN NATHAN HORTON, a/k/a Nate Horton, and, therefore, attributable to each KATHERINE HEREDIA, a/k/a Katherine Meadows and EDWIN NATHAN HORTON, a/k/a Nate Horton, as a violation of Title 18, United States Code, Section 1952(a)(3)(A).<sup>7</sup>

This is a violation of Title 18, United States Code, Sections 1952(a)(3)(A) and 2.

**THE GRAND JURY FURTHER CHARGES:**

**Count 9**  
**(Attempt to Financially Benefit from Sex Trafficking)**

1. The Grand Jury realleges and by this reference incorporates herein, paragraphs 1-11, inclusive, of the Introductory Allegations of this Superseding Indictment, as though fully set forth herein.

2. The Grand Jury realleges and by this reference incorporates herein, paragraphs 2-16, and subparagraphs thereof, inclusive, of Count 1, above, of this Superseding Indictment, as though fully set forth herein.

3. The Grand Jury realleges and by this reference incorporates herein Counts 4-8,

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<sup>7</sup> Pinkerton v. United States, 328 U.S. 640 (1946)

inclusive, of this Superseding Indictment, as though fully set forth herein.

4. On or about January 21, 2010, in and about Council Bluffs in the Southern District of Iowa and elsewhere, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane Horton, and RAMON D. HEREDIA, knowingly attempted to benefit financially and by receiving anything of value from participation in a venture which has engaged in an act described in Title 18, United States Code, Section 1591(a)(1), knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, including among other means those described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means were used and would be used to cause and attempt to cause SG to engage in a commercial sex act, in that, as a part of the conspiracy set forth in Count 1 of this Superseding Indictment, the Defendants attempted to receive money in payment for a commercial sex act to be performed by SG in Council Bluffs, Iowa.

5. The above violation was committed and carried out in the course of and in furtherance of a sex trafficking venture, that is, the conspiracy set forth in Count 1 of this Superseding Indictment, while MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton and RAMON D. HEREDIA were members of the sex trafficking venture, that is, the conspiracy charged in Count 1 of this Superseding Indictment, and while the Defendants, EDWIN NATHAN HORTON, a/k/a Nate Horton and KATHERINE HEREDIA, a/k/a Katherine Meadows, was each a member of the sex trafficking venture, that is, the conspiracy, and which benefitting financially or by receiving anything of value from participation in the prostitution, that is, sex trafficking venture was reasonably foreseeable to each EDWIN NATHAN HORTON, a/k/a Nate Horton and KATHERINE HEREDIA, a/k/a Katherine Meadows, and, therefore,

attributable to each EDWIN NATHAN HORTON, a/k/a Nate Horton and KATHERINE HEREDIA, a/k/a Katherine Meadows, as a violation of Title 18, United States Code, Sections 1591(a)(2), 1594(a), 1591(b)(1) and 1591(b)(2).<sup>8</sup>

This is a violation of Title 18, United States Code, Sections 1591(a)(2), 1591(b)(1), 1591(b)(2) and 1594(a).

**THE GRAND JURY FURTHER CHARGES:**

**Count 10**

**(Interference with Commerce by Robbery and Attempted Extortion)**

1. On or about March 28, 2009, in and about Pottawattamie County in the Southern District of Iowa and elsewhere, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, aided and abetted by one or more additional persons, including, among others, Katherine Heredia, a/k/a Katherine Meadows, knowingly and willfully, obstructed, delayed and affected, and conspired and attempted to obstruct, delay and affect commerce, as the term "commerce" is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce:

(a) by robbery, as the term "robbery" is defined in Title 18, United States Code, Section 1951, in that the Defendants did knowingly and wilfully take and obtain personal property consisting of money and other tangible personal property from the person and vehicle of an adult male victim, whose identity is known to the grand jury, against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person, as more fully described below; and

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<sup>8</sup> Pinkerton v. United States, 328 U.S. 640 (1946)

(b) by attempted extortion, as the term “extortion” is defined in Title 18, United States Code, Section 1951, in that the Defendants did knowingly and wilfully attempt to obtain personal property consisting of money from the person and bank account of an adult male victim, whose identity is known to the grand jury, with the victim’s consent induced by the wrongful use of force, violence, and fear, as more fully described below.

2. That during and in furtherance of the Conspiracy set forth in Count 1 of this Superseding Indictment, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, and one or more additional persons, including among others, Katherine Heredia, a/k/a Katherine Meadows, knowingly and willfully posted, aided and abetted the posting of, and caused to be posted internet solicitations for the service of prostitutes, which prostitutes were serving the conspiracy, including prostitution service to be provided in interstate commerce, that is between Nebraska and Iowa, one of which solicitations the victim saw in Pottawattamie County in the Southern District of Iowa, and to which the victim responded.

3. That during and in furtherance of the Conspiracy set forth in Count 1 of this Superseding Indictment, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, caused the victim, in response to the solicitation described in paragraph 2 of this Count, to use a facility of interstate commerce, in interstate commerce, that is, between Pottawattamie County in the Southern District of Iowa and Nebraska, by using a telephone and cell phone to arrange for the services of a call-girl and prostitute of the conspiracy.

4. That during and in furtherance of the Conspiracy set forth in Count 1 of this

Superseding Indictment, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, for the purpose of robbing said victim, caused the victim, pursuant to the directions given by the Defendants during the phone conversation described in paragraph 3 of this Count, to travel in interstate commerce, that is, from Pottawattamie County in the Southern District of Iowa, to Omaha, Nebraska, for the stated purpose of receiving the services of a call-girl and prostitute from the conspiracy;

5. That for the purpose of robbing said victim, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, aided and abetted by one of more persons, including Katherine Heredia, a/k/a Katherine Meadows, lured said victim into a motel in Omaha, Nebraska.

6. That once the victim was lured into the motel room, the Defendants, MERRIDETH JUNE CRANE-HORTON, a/k/a Mary Crane-Horton, and RAMON D. HEREDIA, aided and abetted by Katherine Heredia, a/k/a Katherine Meadows, by physical assault and by threat of physical assault, took and obtained the victim's money and other tangible personal property from the person of the victim, and then from the vehicle which the victim had driven from the Southern District of Iowa to Nebraska.

7. That after the Defendants had taken and obtained by robbery the money and tangible personal property which the victim had upon his person and in his vehicle, the Defendants demanded, with the threat of further force and violence against the victim, that the victim obtain additional money for the Defendants from the victim's bank. However, the victim could not at that time access his money in his bank. The Defendants then released the victim to return from Omaha, Nebraska, to Council Bluffs in the Southern District of Iowa, but with the promise from

the victim that the victim would when the bank was open, obtain and give to the Defendants additional money from the victim's bank, which promise was elicited from the victim by the Defendants under the Defendants' express threat that the Defendants would inflict further force and violence upon the victim if the victim did not obtain and give to the Defendants said additional money from the victim's bank as demanded by the Defendants.

This is a violation of Title 18, United States Code, Section 1951(a).

**A TRUE BILL.**

/S/  
FOREPERSON

United States Attorney  
Nicholas A. Klinefeldt

By: S/Stephen Patrick O'Meara  
Stephen Patrick O'Meara  
Assistant United States Attorney