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CLERK OF DISTRICT COURT  
SOUTHERN DISTRICT OF IOWA

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

UNITED STATES OF AMERICA,	)	
	)	
v.	)	Criminal No. 1:13-cr-054
	)	
JERMAINE LAMAR ROBINSON,	)	<b><u>INDICTMENT</u></b>
a/k/a Jermaine Lemar Robinson,	)	
Jermaine Leonard Robinson,	)	T. 18, U.S.C., § 1591(a)(1)
Jermaine L. Robinson,	)	T. 18, U.S.C., § 1591(a)(2)
And	)	T. 18, U.S.C., § 1591(b)(1)
RICHARD E. SCOTT,	)	T. 18, U.S.C., § 1594(b)(2)
a/k/a Richard Eugene Scott,	)	T. 18, U.S.C., § 1594(a)
Richard S. Pena,	)	T. 18, U.S.C., § 1594(c)
	)	
Defendants.	)	

**THE GRAND JURY CHARGES:**

**Introductory Allegations**

1. As used in this 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.
2. As used in this Indictment, the term "sex act" includes "sex act" as defined in Title 18, United States Code, Sections 2246(2)(A)-(D), inclusive.
3. At all times material to this Indictment, [www.backpage.com](http://www.backpage.com), [craigslist](http://craigslist), [sipsap](http://sipsap), [adultsearch](http://adultsearch), [eroticmugshots](http://eroticmugshots), and similar web sites 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 various States of the United States of America, including among others, doing business between the State of Iowa (including the Southern District of Iowa) and the State of Nebraska.
4. As referred to in this Indictment, Omaha is a city located in the State and District of

Nebraska; and Council Bluffs is a city located in the Southern District of Iowa and the State of Iowa, which city is attendant to and a part of the Omaha Metropolitan Area.

5. At all times material to this Indictment, Defendant, JERMAINE LAMAR ROBINSON, was approximately 33 years of age.

6. At all times material to this Indictment, Defendant, RICHARD E. SCOTT, was approximately 60 years of age.

7. At times material to this Indictment, M-1 was a minor female, 17 years of age, who turned 18 years of age during the time material to this Indictment.

**THE GRAND JURY FURTHER CHARGES:**

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

1. The Grand Jury realleges and by this reference incorporates herein paragraphs 1-7, inclusive, of the Introductory Allegations of this Indictment, as though fully set forth herein.

2. Beginning by at least on or about May of 2013, and continuing to on or about the present, the exact dates unknown to the Grand Jury, in and about the Southern District of Iowa and elsewhere, the Defendants, JERMAINE LAMAR ROBINSON, a/k/a Jermaine Lemar Robinson, Jermaine Leonard Robinson, Jermaine L. Robinson, and RICHARD E. SCOTT, a/k/a Richard Eugene Scott, Richard S. Pena, 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:

a. 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) and 1591(b)(1); and

b. 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, and having had a reasonable opportunity to observe the person under 18 years of age who was so recruited, enticed, harbored, transported, provided, obtained, and maintained, in violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(2); and

c. 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 2(a) and 2(b) 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).

3. In furtherance of the conspiracy and to achieve its objects, the Defendants, JERMAINE LAMAR ROBINSON and RICHARD E. SCOTT, knowingly, with reckless disregard, and having had a reasonable opportunity to observe M-1, willfully committed, aided and abetted, caused to be committed, and had reasonable foreseeability of the following overt acts, among others, in the Southern District of Iowa and elsewhere, beginning by at least in or about May of 2013, and continuing to in or about the present.

3.1 It was a part of said conspiracy that beginning by at least in or about May of 2013,

Defendant ROBINSON, who was then about age 33, did knowingly and intentionally make statements to M-1 to deceive M-1, who was during much of the time material to this Indictment suffering from obvious vulnerabilities, including among others, being 17 years of age, homeless, destitute, and suffering from emotional or mental health issues, into thinking that ROBINSON loved M-1, and would care for her, and that ROBINSON and M-1 had an intimate, personal relationship; all for the purpose of deceiving M-1 into working as a prostitute for Defendant ROBINSON.

3.2 It was a part of said conspiracy that beginning in or about May of 2013, and continuing to in or about October of 2013, Defendant ROBINSON knowingly and intentionally, ordinarily on a daily basis, gave M-1, who was at the time 17 to 18 years of age, alcohol, marijuana, and cocaine for the purpose of manipulating M-1 to work as a prostitute for Defendant ROBINSON.

3.3 It was a part of the conspiracy that beginning by at least in or about July of 2013, Defendant ROBINSON took photographs of M-1, and caused M-1 to take photographs of herself, for the purpose of posting said photographs in internet solicitations for prostitution.

3.4 It was a part of the conspiracy that beginning by at least July of 2013, and continuing to at least in or about October of 2013, Defendant ROBINSON posted internet solicitations, including photographs, on various websites in interstate commerce, including in the Southern District of Iowa, seeking customers to engage in commercial sex acts with M-1.

3.5 It was a part of said conspiracy that beginning in or about July of 2013, and continuing to in or about October of 2013, Defendant ROBINSON provided M-1 with clothing to use while engaging in prostitution at Defendant's direction.

3.6 It was a part of said conspiracy that beginning in or about July of 2013, when M-1

was 17 years of age, and continuing to in or about October of 2013, in and about Omaha, Nebraska, Lincoln, Nebraska, Council Bluffs, Iowa, and Carter Lake, Iowa, Defendant ROBINSON caused M-1 to engage in and attempt to engage in numerous commercial sex acts, including, but not limited to, vaginal intercourse and oral sex.

3.7 It was a part of said conspiracy that beginning in or about July of 2013, when M-1 was 17 years of age, and continuing to in or about October of 2013, in Nebraska and in Iowa, including between Nebraska and Council Bluffs, Iowa, and between Nebraska and Carter Lake, Iowa, Defendant ROBINSON transported M-1 to and from prostitution appointments, in which M-1 engaged in or attempted to engage in commercial sex acts.

3.8 It was a part of the conspiracy that beginning in or about August of 2013, and continuing thereafter to the present, Defendant ROBINSON, aided and abetted by Defendant SCOTT, threatened M-1, who was during much of the time material to this Indictment suffering from various vulnerabilities, including among others, being 17 years of age, homeless, destitute, regularly under the influence of and suffering from emotional or mental health issues, with physical harm to herself, and physically harmed M-1, and exposed M-1 to the physical harm of another prostitute, all for the purpose of creating a "climate of fear" and thereby causing M-1 to engage in and attempt to engage in commercial sex acts at Defendants' direction, and to cause M-1 not to disclose to law enforcement authorities the sex trafficking of M-1 in which Defendants were engaging and had engaged.

3.9 It was a part of said conspiracy that beginning in or about July of 2013, and continuing to in or about October of 2013, Defendant ROBINSON received all of the money, except that intended to go to Defendant SCOTT for Defendant ROBINSON, in United States currency, from the commercial sex acts engaged in and attempted by M-1.

3.10 It was a part of said conspiracy that on or about September 26, 2013, Defendant ROBINSON purchased a 2001 BMW automobile, with money Defendant received from M-1 for prostitution in which Defendant ROBINSON caused M-1 to engage, and which vehicle was thereafter from time-to-time used to facilitate and carry out Defendants' prostitution enterprise, and which vehicle was specifically used by Defendant SCOTT on or about October 9, 2013, to transport M-1 for purposes of engaging in and attempting to engage in a commercial sex act on behalf of the conspiracy.

3.11 It was a part of said conspiracy that Defendant RICHARD E. SCOTT did knowingly and intentionally assist Defendant JERMAINE LAMAR ROBINSON in recruiting, enticing, obtaining, and providing M-1 as a prostitute working for Defendant ROBINSON; that is, Defendant SCOTT did encourage and advise Defendant ROBINSON regarding causing M-1 to work for Defendant ROBINSON as a prostitute.

3.12 It was a part of said conspiracy that Defendant RICHARD E. SCOTT did knowingly and intentionally assist Defendant JERMAINE LAMAR ROBINSON in, among other prohibited acts, obtaining, providing, and maintaining M-1 as a prostitute working for Defendant ROBINSON; that is, Defendant SCOTT did encourage and advise Defendant ROBINSON regarding how to treat M-1 as a prostitute while M-1 worked as a prostitute for Defendant ROBINSON.

3.13 It was a part of said conspiracy that Defendant RICHARD E. SCOTT did knowingly and intentionally assist Defendant JERMAINE LAMAR ROBINSON in, among other prohibited acts, providing, maintaining, and transporting M-1 as a prostitute working for Defendant ROBINSON; that is, Defendant SCOTT did transport M-1 to at least one prostitution appointment while M-1 was working as a prostitute for Defendant ROBINSON, including, but

not necessarily limited to, on or about October 9, 2013, in and about Omaha, Nebraska.

3.14 It was a part of said conspiracy that Defendant RICHARD E. SCOTT did knowingly and intentionally assist Defendant JERMAINE LAMAR ROBINSON in, among other prohibited acts, providing and maintaining M-1 as a prostitute working for Defendant ROBINSON; that is, after Defendant ROBINSON was arrested on unrelated charges on or about October 7, 2013, and following telephone conversations with Defendant ROBINSON, Defendant SCOTT did, on or about October 9, 2013, in and about Omaha, Nebraska, contact M-1, and encourage and direct M-1 to engage in and attempt to engage in commercial sex acts for the financial benefit of Defendant ROBINSON (that is to raise money to attempt to bond ROBINSON out of jail), and did take M-1 to a location in Omaha, Nebraska, associated with Defendant ROBINSON, to obtain the clothing Defendant ROBINSON had obtained for M-1 to use to engage in and attempt to engage in commercial sex acts while working as a prostitute for Defendant ROBINSON.

3.15 It was a part of said conspiracy that Defendant RICHARD E. SCOTT did knowingly and intentionally, throughout the term of the conspiracy, join with Defendant ROBINSON, to cover up said conspiracy, and to mislead authorities investigating Defendant ROBINSON's activities from learning the truth about Defendant ROBINSON's engaging in and attempting to engage in sex trafficking in violation of federal law.

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

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 2  
(Sex Trafficking)**

1. The Grand Jury realleges and by this reference incorporates herein paragraphs 1-7, inclusive, of the Introductory Allegations of this Indictment, as though fully set forth herein.

2. The Grand Jury realleges and by this reference incorporates herein Count 1 of this Indictment, as though fully set forth herein.

3. On or about July 8, 2013, in the Southern District of Iowa and elsewhere, the Defendant, JERMAINE LAMAR ROBINSON, a/k/a Jermaine Lemar Robinson, Jermaine Leonard Robinson, Jermaine L. Robinson, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain, and did attempt to recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, that is, M-1, knowing and in reckless disregard of the fact that force, threat of force, fraud and coercion would be used to cause M-1 to engage in and attempt to engage in a commercial sex act, and knowing and in reckless disregard of the fact that M-1 had not attained the age of 18 years, and with Defendant having had a reasonable opportunity to observe M-1, and that M-1 would be caused to engage in a commercial sex act; that is, Defendant ROBINSON transported M-1 from Nebraska, to the Candlewood Suites motel, in and through Carter Lake in the Southern District of Iowa, to engage in and attempt to engage in one or more commercial sex acts, including but not limited to vaginal intercourse or any other sex act described in Title 18, United States Code, Sections 2246(2)(A)-(D), inclusive; and Defendant benefitted financially and by receiving anything of value from the commercial sex act and attempted commercial sex act performed by M-1 in or having traveled through Carter Lake.

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 Indictment, while JERMAINE LAMAR ROBINSON, a/k/a Jermaine Lemar Robinson, Jermaine Leonard Robinson, Jermaine L. Robinson, was a member of the conspiracy charged in Count 1 of this Indictment, and while Defendant, RICHARD E. SCOTT, a/k/a Richard Eugene Scott, Richard S. Pena, was a member

of the conspiracy, and which Sex Trafficking was reasonably foreseeable to and, therefore, attributable to Defendant, RICHARD E. SCOTT, as a violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), 1591(b)(2), and 1594(a).<sup>1</sup>

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

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 3  
(Sex Trafficking)**

1. The Grand Jury realleges and by this reference incorporates herein paragraphs 1-7, inclusive, of the Introductory Allegations of this Indictment, as though fully set forth herein.

2. The Grand Jury realleges and by this reference incorporates herein Count 1 of this Indictment, as though fully set forth herein.

3. Between on or about July 8, 2013, and August 22, 2013, in the Southern District of Iowa and elsewhere, the Defendant, JERMAINE LAMAR ROBINSON, a/k/a Jermaine Lemar Robinson, Jermaine Leonard Robinson, Jermaine L. Robinson, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain, and did attempt to recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, that is, M-1, knowing and in reckless disregard of the fact that force, threat of force, fraud and coercion would be used to cause M-1 to engage in and attempt to engage in a commercial sex act, and knowing and in reckless disregard of the fact that M-1 had not attained the age of 18 years, and with Defendant having had a reasonable opportunity to observe M-1, and that M-1 would be caused to engage in a commercial sex act; that is, Defendant ROBINSON

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

transported M-1 from Nebraska, to a house in Council Bluffs, in the Southern District of Iowa, to engage in and attempt to engage in one or more commercial sex acts, including but not limited to vaginal intercourse or any other sex act described in Title 18, United States Code, Sections 2246(2)(A)-(D), inclusive; and Defendant benefitted financially and by receiving anything of value from the commercial sex act and attempted commercial sex act performed by M-1 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 Indictment, while JERMAINE LAMAR ROBINSON, a/k/a Jermaine Lemar Robinson, Jermaine Leonard Robinson, Jermaine L. Robinson, was a member of the conspiracy charged in Count 1 of this Indictment, and while Defendant, RICHARD E. SCOTT, a/k/a Richard Eugene Scott, Richard S. Pena, was a member of the conspiracy, and which Sex Trafficking was reasonably foreseeable to and, therefore, attributable to Defendant, RICHARD E. SCOTT, as a violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), 1591(b)(2), and 1594(a).<sup>2</sup>

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

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 4  
(Sex Trafficking)**

1. The Grand Jury realleges and by this reference incorporates herein paragraphs 1-7, inclusive, of the Introductory Allegations of this Indictment, as though fully set forth herein.

2. The Grand Jury realleges and by this reference incorporates herein Count 1 of this

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

Indictment, as though fully set forth herein.

3. Between on or about mid-July of 2013, and early October of 2013, in the Southern District of Iowa and elsewhere, the Defendant, JERMAINE LAMAR ROBINSON, a/k/a Jermaine Lemar Robinson, Jermaine Leonard Robinson, Jermaine L. Robinson, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain, and did attempt to recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, that is, M-1, knowing and in reckless disregard of the fact that force, threat of force, fraud and coercion would be used to cause M-1 to engage in and attempt to engage in a commercial sex act, and knowing and in reckless disregard of the fact that M-1 had not attained the age of 18 years, and with Defendant having had a reasonable opportunity to observe M-1, and that M-1 would be caused to engage in a commercial sex act; that is, Defendant ROBINSON transported M-1 from Nebraska, to the Holiday Inn motel in Carter Lake, in the Southern District of Iowa, to engage in and attempt to engage in one or more commercial sex acts, including but not limited to vaginal intercourse or any other sex act described in Title 18, United States Code, Sections 2246(2)(A)-(D), inclusive; and Defendant benefitted financially and by receiving anything of value from the commercial sex act and attempted commercial sex act performed by M-1 in Carter Lake.

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 Indictment, while JERMAINE LAMAR ROBINSON, a/k/a Jermaine Lemar Robinson, Jermaine Leonard Robinson, Jermaine L. Robinson, was a member of the conspiracy charged in Count 1 of this Indictment, and while Defendant, RICHARD E. SCOTT, a/k/a Richard Eugene Scott, Richard S. Pena, was a member of the conspiracy, and which Sex Trafficking was reasonably foreseeable to and, therefore,

attributable to Defendant, RICHARD E. SCOTT, as a violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), 1591(b)(2), and 1594(a).<sup>3</sup>

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

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 5  
(Sex Trafficking)**

1. The Grand Jury realleges and by this reference incorporates herein paragraphs 1-7, inclusive, of the Introductory Allegations of this Indictment, as though fully set forth herein.

2. The Grand Jury realleges and by this reference incorporates herein Count 1 of this Indictment, as though fully set forth herein.

3. Between on or about August 23, 2013, and early October of 2013, in the Southern District of Iowa and elsewhere, the Defendant, JERMAINE LAMAR ROBINSON, a/k/a Jermaine Lemar Robinson, Jermaine Leonard Robinson, Jermaine L. Robinson, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain, and did attempt to recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person, that is, M-1, knowing and in reckless disregard of the fact that force, threat of force, fraud and coercion would be used to cause M-1 to engage in and attempt to engage in a commercial sex act; that is, Defendant ROBINSON transported M-1 from Nebraska, to the Holiday Inn motel (Ameristar Casino) in Council Bluffs in the Southern District of Iowa, to engage in and attempt to engage in one or more commercial sex acts, including but not limited to vaginal intercourse or any other sex act described in Title 18, United States Code, Sections

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

2246(2)(A)-(D), inclusive; and Defendant benefitted financially and by receiving anything of value from the commercial sex act and attempted commercial sex act performed by M-1 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 Indictment, while JERMAINE LAMAR ROBINSON, a/k/a Jermaine Lemar Robinson, Jermaine Leonard Robinson, Jermaine L. Robinson, was a member of the conspiracy charged in Count 1 of this Indictment, and while Defendant, RICHARD E. SCOTT, a/k/a Richard Eugene Scott, Richard S. Pena, was a member of the conspiracy, and which Sex Trafficking was reasonably foreseeable to and, therefore, attributable to Defendant, RICHARD E. SCOTT, as a violation of Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), 1591(b)(2), and 1594(a).<sup>4</sup>

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

**A TRUE BILL.**

/S/  
FOREPERSON

Nicholas A. Klinefeldt  
United States Attorney

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

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