



(B) knowingly and willfully recruit, entice, harbor, provide, obtain and maintain by any means, in and affecting interstate commerce, M.W., and L.P., adult females known to the Grand Jury, and other adult females unknown to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, or any combination of the same, would be used to cause the adult females to engage in commercial sex acts, in violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1).

**Manner and Means of the Conspiracy**

It was part of the conspiracy that:

1. The defendants, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.**, utilized various hotels in the Columbus, Ohio area to harbor the minor female Jane Doe #1 and adult females and to cause Jane Doe #1 and the adult females to engage in commercial sex acts for the financial benefit of the defendants.
2. The defendants, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.**, utilized facilities of interstate and foreign commerce, and caused others to utilize facilities of interstate and foreign commerce, that is, computers, cellular phones, and the Internet, to place advertisements on internet websites such as "backpage.com" for the purposes of soliciting customers for commercial sex acts.
3. The defendants, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.**, utilized cellular phones and computers to take sexually explicit photographs of females, or to obtain sexually explicit photographs of unknown females from the internet, which they posted or caused to be posted in online advertisements for commercial sex acts.

4. The defendants, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.**, instructed females how much to charge for various commercial sex acts.
5. The defendants, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.**, regularly retained all or a portion of the money that females received for performing commercial sex acts.
6. The defendants, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.**, provided females who engaged in commercial sex acts for the defendants' financial benefit with illegal narcotics.

#### Overt Acts

In furtherance of the conspiracy, and to effect the objects thereof, the defendants, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.**, committed one or more of the following overt acts in the Southern District of Ohio and elsewhere:

1. Between on or about September 15, 2013, and September 17, 2013, the exact date being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.** encountered Jane Doe #1, a minor female who was previously known to the defendants, in Lima, Ohio, and transported Jane Doe #1 to a hotel in Columbus, Ohio that was associated with a national hotel chain operating in and affecting interstate commerce.
2. Between on or about September 15, 2013, and September 17, 2013, the exact date being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.** harbored and maintained Jane Doe #1 at the aforementioned hotel in Columbus, Ohio.

3. On or about September 16, 2013, and September 17, 2013, the exact date being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.** informed Jane Doe #1 that they needed to make money and that men would be coming to see her; instructed Jane Doe #1 how much the men should pay her based on the time they spent with her; and assured Jane Doe #1 that they would not be far away when the men came to the hotel room.
4. On or about September 17, 2013, **KEITH A. ARRICK, JR.** utilized facilities affecting interstate and foreign commerce, that is, a cellular phone, the internet and/or a computer, to obtain sexually suggestive photographs of an unknown female believed to resemble Jane Doe #1, and placed the photographs in an advertisement offering commercial sex acts on the website "backpage.com."
5. On or about September 17, 2013, **KEITH A. ARRICK, JR.** utilized facilities affecting interstate and foreign commerce, that is, a cellular phone, to arrange for an undercover officer who was posing as an individual seeking to engage in sexual activity in exchange for monetary payment, to travel to Jane Doe #1's hotel room for the purpose of engaging in commercial sexual activity with Jane Doe #1.
6. On or about September 17, 2013, **KEITH A. ARRICK, JR.** instructed Jane Doe #1 that a man was coming to see her, that the man would be paying for one hour of Jane Doe #1's time, that Jane Doe #1 was to do what the man

asked, and that Jane Doe #1 was to send **KEITH A. ARRICK, JR.** a text message when the man left.

7. During the month of September 2013, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** encountered M.W., an adult female, in Covington, Kentucky, and thereafter transported M.W. from Covington, Kentucky to Cincinnati, Ohio and Columbus, Ohio.
8. Between on or about September 1, 2013, and September 17, 2013, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** harbored, transported and maintained M.W. in his automobile at various locations in Covington, Kentucky and Cincinnati, Ohio, and caused M.W. to engage in commercial sex acts in Covington, Kentucky for his financial benefit.
9. Between on or about September 1, 2013, and September 17, 2013, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** provided heroin to M.W.
10. Between on or about September 1, 2013, and September 17, 2013, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** transported M.W. from Covington, Kentucky to Columbus, Ohio; thereafter **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.** maintained M.W. in a room in a Columbus, Ohio hotel, which was associated with a national hotel chain that operates in and affecting interstate commerce, and which the defendants obtained via a means or facility of interstate commerce, that is the internet and cellular phone.

11. Between on or about September 14, 2013, and September 17, 2013, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, JR.** utilized facilities affecting interstate and foreign commerce, that is, a cellular phone, the internet and/or a computer, to obtain sexually suggestive photographs of an unknown female believed to resemble M.W., and placed the photographs in advertisements offering commercial sex acts on the website “backpage.com.”
12. Between on or about September 14, 2013, and September 17, 2013, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.** instructed M.W. how she was to talk to men who called in response to the advertisement on “backpage.com,” and how much to charge the men based on the amount of time that they wanted to spend with her.
13. Between on or about September 14, 2013, and September 17, 2013, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.** caused M.W. to engage in numerous commercial sex acts at a hotel located in Columbus, Ohio that is associated with a national hotel chain that operates in and affecting interstate commerce; transported M.W. to other locations in Columbus, Ohio for the purpose of commercial sexual activity; and further required that M.W. provide the defendants with all of the payment she received for such commercial sex acts.

14. Between on or about September 14, 2013, and September 17, 2013, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** stated to M.W., "bitch I'll kill you," while placing his hands around her neck, in response to M.W. indicating that she did not want to continue to engage in commercial sexual activity.
15. During the month of September 2013, the exact date being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.** encountered L.P., an adult female known to the Grand Jury, and an adult female relative of L.P., in Columbus, Ohio, and during this encounter suggested that L.P. and her female relative work for the defendants on the website "backpage.com."
16. During the month of September 2013, the exact date being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** transported L.P. and her female relative to a motel in the Columbus, Ohio area that is associated with a national motel chain that operates in and affecting interstate commerce, and provided a cellular phone to L.P. and her female relative.
17. During the month of September 2013, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.** maintained L.P., her female relative, and other adult females unknown to the Grand Jury, at the aforementioned motel in the Columbus, Ohio area.
18. During the months of September 2013 and October 2013, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** utilized a cellular phone to photograph L.P. and her female relative in sexually

suggestive poses; caused and directed that cellular phones be used to place the photographs in advertisements offering commercial sex acts on various websites, including “backpage.com;” and instructed L.P. and her female relative how to talk to men who called in response to the “backpage.com” advertisement.

19. During the months of September 2013 and October 2013, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.** caused L.P., her female relative, and other adult females unknown to the Grand Jury, to engage in commercial sex acts at various hotels and motels in the Columbus, Ohio area, which are connected to national hotel and motel chains that operate in and affecting interstate commerce.
20. **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.** required that L.P. and the other females provide the defendants with all or a portion of the payments received for engaging in commercial sex acts.
21. Between September 2013 and February 2014, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.** transported L.P. to various locations in the Columbus, Ohio area and between Columbus, Ohio and Covington, Kentucky, and harbored and maintained L.P. at various hotels in Columbus, Ohio, Cincinnati, Ohio, and Covington, Kentucky, which are associated with national hotel chains that operate in and affecting interstate commerce.



22. Between October of 2013 and February of 2014, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** caused advertisements for commercial sexual activity that included photographs of L.P. to be placed on the website "backpage.com" in Columbus, Ohio, Cincinnati, Ohio, and Covington, Kentucky, and caused L.P. to engage in commercial sex acts for the financial benefit of **KEITH A. ARRICK, SR.**
23. Between October of 2013 and February of 2014, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** obtained heroin for L.P. and withheld such heroin from L.P. until she had earned the amount of money he desired by performing commercial sex acts.
24. Between October of 2013 and February of 2014, the exact dates being unknown to the Grand Jury, **KEITH A. ARRICK, SR.** used physical violence and threats of physical violence against L.P., such threats including that he would kill L.P. if she attempted to leave him.

In violation of 18 U.S.C. § 1594(c).

### COUNT TWO

Between on or about September 15, 2013, and September 17, 2013, the exact dates being unknown to the Grand Jury, in the Southern District of Ohio, the defendants, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.**, aka, "Young Chuuch," aka "King," knowingly recruited, enticed, harbored, provided, obtained and maintained by any means, and attempted to recruit, entice, harbor, provide, obtain and maintain by any means, Jane Doe #1, a minor whose identity is known to the Grand Jury, in and affecting interstate and foreign commerce, knowing

and in reckless disregard of the fact that Jane Doe #1 had not attained the age of 18 years, and knowing that Jane Doe #1 would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1), 1591(b)(2), 1594(a) and 18 U.S.C. § 2.

### **COUNT THREE**

Between on or about September 1, 2013 and September 20, 2013, the exact dates being unknown to the Grand Jury, in the Southern District of Ohio and elsewhere, the defendants, **KEITH A. ARRICK, SR.** and **KEITH A. ARRICK, JR.**, aka, "Young Chuuch," aka "King," knowingly recruited, enticed, harbored, provided, obtained and maintained by any means, in and affecting interstate and foreign commerce, M.W., an adult female whose identity is known to the Grand Jury, or did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, or any combination of such means would be used to cause M.W. to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1) and (2), 1591(b)(1) and 18 U.S.C. § 2.

### **COUNT FOUR**

Between September of 2013 and February of 2014, the exact dates being unknown to the Grand Jury, in the Southern District of Ohio and elsewhere, the defendants, **KEITH A. ARRICK, SR.** and **KEITH ARRICK, JR.**, aka, "Young Chuuch," aka "King," knowingly recruited, enticed, harbored, provided, obtained and maintained by any means, in and affecting

interstate and foreign commerce, L.P., an adult female whose identity is known to the Grand Jury, or did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, or any combination of such means would be used to cause L.P. to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1) and (2), 1591(b)(1) and 18 U.S.C. § 2.

#### COUNT FIVE

Between September 1, 2013 and September 20, 2013, the exact dates being unknown to the Grand Jury, in the Southern District of Ohio and elsewhere, the defendant, **KEITH A. ARRICK, SR.** did knowingly transport M.W., an adult female whose identity is known to the Grand Jury, in interstate commerce from the state of Kentucky to the state of Ohio, with the intent that M.W. would engage in prostitution.

In violation of 18 U.S.C. § 2421.

**COUNT SIX**

Between October of 2013 and February of 2014, the exact dates being unknown to the Grand Jury, in the Southern District of Ohio and elsewhere, the defendant, **KEITH A. ARRICK, SR.** did knowingly transport L.P., an adult female whose identity is known to the Grand Jury, in interstate commerce between Ohio and Kentucky, with the intent that L.P. would engage in prostitution.

In violation of 18 U.S.C. § 2421.

A TRUE BILL.

s/Foreperson  
FOREPERSON

CARTER M. STEWART  
United States Attorney

  
GARY L. SPARTIS (0023428)  
Columbus Branch Chief

