SEALED

FILED
JUL 23 2024

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON GRAND JURY 2023
JULY 23, 2024 SESSION

UNITED STATES OF AMERICA

v. CRIMINAL NO. 2:24-cr-00118

18 U.S.C. § 1591(a)(1)
18 U.S.C. § 1591(a)(2)
18 U.S.C. § 1591(b)(1)
18 U.S.C. § 1591(b)(2)
18 U.S.C. § 1591(c)
18 U.S.C. § 1591(d)

TIWAN ROBERT BAILEY
also known as "Quick"

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

In and around December 2023, at or near Charleston and Rand, Kanawha County, West Virginia, within the Southern District of West Virginia, defendant TIWAN ROBERT BAILEY, also known as "Quick," in and affecting interstate or foreign commerce, knowingly recruited, enticed, harbored, provided, obtained, maintained, patronized, and solicited, by any means, Victim 1, and benefitted financially and by receiving anything of value from participation in a venture which recruited, enticed, harbored, provided, obtained, maintained, patronized, and solicited, by any means, Victim 1, having had a reasonable opportunity to observe Victim 1 and knowing and in reckless disregard of the fact that

Victim 1 had not attained the age of 18 years and that Victim 1 would be caused to engage in a commercial sex act.

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

COUNT TWO

From in and around November 2023 through in and around January 2024, at or near Charleston and Rand, Kanawha County, West Virginia, within the Southern District of West Virginia, defendant TIWAN ROBERT BAILEY, also known as "Quick," in and affecting interstate or foreign commerce, knowingly recruited, enticed, harbored, provided, obtained, maintained, patronized, and solicited, by any means, Victim 2, and benefitted financially and by receiving anything of value from participation in a venture which recruited, enticed, harbored, provided, obtained, maintained, patronized, and solicited, by any means, Victim 2, knowing and in reckless disregard of the fact that means of force, threats of force, coercion, as defined in 18 U.S.C. § 1591(e)(2), and any combination of such means would be used to cause Victim 2 to engage in a commercial sex act.

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

COUNT THREE

From on or about May 20, 2024, through on or about June 5, 2024, at or near Rand, Kanawha County, West Virginia, within the Southern District of West Virginia, and elsewhere, defendant TIWAN ROBERT BAILEY, also known as "Quick," obstructed, attempted to obstruct, and in any way interfered with and prevented the enforcement of 18 U.S.C. § 1591.

In violation of Title 18, United States Code, Section 1591(d).

FORFEITURE

Pursuant to 18 U.S.C. § 1594(d), upon conviction of an offense in violation of Title 18, United States Code, Section 1591, the defendant, TIWAN ROBERT BAILEY, also known as "Quick," shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses.

This property includes, but is not limited to, any real and personal property constituting or traceable to gross profits and other proceeds obtained from the violations set forth in this Indictment and any real and personal property used or intended to be used to commit or to facilitate the commission of the violations set forth in this Indictment.

WILLIAM S. THOMPSON
United States Attorney

By: _____
JENNIFER RADA HERRALD
Assistant United States Attorney