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OCT 16 2024
RORY L. PERRY II, CLERK
U.S. District Court
Southern District of West Virginia

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON GRAND JURY 2023
OCTOBER 16, 2024 SESSION

UNITED STATES OF AMERICA

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

TIWAN ROBERT BAILEY
also known as "Quick"
CARRIE ROY
also known as "Carrie Ash"
DAVID LEE WHITE

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)
18 U.S.C. § 1594(c)
18 U.S.C. § 2

THIRD SUPERSEDING INDICTMENT

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," and CARRIE ROY, also known as "Carrie Ash," aided and abetted by one another, 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), and Section 2.

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 in and around December 2023 through in and around July 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 3, 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 3, 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 3 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 FOUR

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 4, 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 4, 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 4 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 FIVE

From on or about May 20, 2024, through on or about October 15, 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," aided and abetted by defendant DAVID LEE WHITE, 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) and Section 2.

COUNT SIX

In and around December 2023, at or near Charleston and Rand, Kanawha County, West Virginia, within the Southern District of West Virginia, defendants TIWAN ROBERT BAILEY, also known as "Quick," and CARRIE ROY, also known as "Carrie Ash," together with other persons whose identities are known and unknown to the Grand Jury, conspired with one another to knowingly, in and affecting interstate or foreign commerce, recruit, entice, harbor, provide, obtain, maintain, patronize, and solicit, by any means, Victim 1, and 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) and (c) and 1594(c).

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 Third Superseding 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 Third Superseding Indictment.

WILLIAM S. THOMPSON
United States Attorney

By: _____
JENNIFER RADA HERRALD
Assistant United States Attorney