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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

April 2021 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL JAMES PRATT (1),
aka "Mark,"
MATTHEW ISAAC WOLFE (2),
aka "Ben,"

Defendants.

Case No. 19CR4488-JLS

I N D I C T M E N T
(Superseding)

Title 18, U.S.C., Secs. 1594(c) - Conspiracy to Commit Sex Trafficking by Force, Fraud and Coercion; Title 18, U.S.C., Sec. 1591(a)(1) and 1591(a)(2) - Sex Trafficking by Force, Fraud and Coercion; Title 18, U.S.C., Sec. 2251(a) and (e) - Production of Child Pornography; Title 18, U.S.C., Sec. 1591(a)(1), (a)(2) and (c) - Sex Trafficking of a Minor and by Force, Fraud and Coercion; Title 18, U.S.C., Sec. 2 - Aiding and Abetting; Title 18, U.S.C., Secs. 1956(a)(1)(A)(i) and 1956(h) - Conspiracy to Launder Monetary Instruments; Title 18, U.S.C., Secs. 982(a) and 982(b), 1594(d) and 2253(a) and 2253(b), and Title 28, U.S.C., Sec. 2461(c) - Criminal Forfeiture

The grand jury charges:

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Count 1

Conspiracy to Commit

Sex Trafficking by Force, Fraud and Coercion

Beginning on an unknown date, but no later than approximately 2012, and continuing through October 9, 2019, within the Southern District of California and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark," MATTHEW ISAAC WOLFE, aka "Ben," and Ruben Andre Garcia, aka "Jonathan" (charged elsewhere), Theodore Wilfred Gyi, aka "Teddy" (charged elsewhere), and Valorie Moser (charged elsewhere), conspired and agreed with each other and others to knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person – to wit, Victims 1-15 – knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, would be used to cause these persons to engage in a commercial sex act, and to benefit financially and receive anything of value from participation in a venture engaged in such acts, in violation of Title 18, United States Code, Section 1591(a)(1) and (a)(2).

All in violation of Title 18, United States Code, Section 1594(c).

Count 2

Sex Trafficking by Force, Fraud and Coercion

On or about May 2012, within the Southern District of California and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark," and MATTHEW ISAAC WOLFE, aka "Ben," knowingly, in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, and solicited Victim 1, and benefitted financially and by receiving anything of value from participation in a venture, which recruited, enticed, harbored, transported, provided,

1 obtained, and maintained Victim 1, knowing and in reckless disregard of
2 the fact that means of force, threats of force, fraud, coercion, and any
3 combination of such means, would be used to cause Victim 1 to engage in
4 a commercial sex act; in violation of Title 18, United States Code,
5 Sections 1591(a)(1), 1591(a)(2) and 2 and Pinkerton v. United States,
6 328 U.S. 640 (1946).

7 Count 3

8 Sex Trafficking by Force, Fraud and Coercion

9 On or about August 2013, within the Southern District of California
10 and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark," and MATTHEW
11 ISAAC WOLFE, aka "Ben," knowingly, in and affecting interstate and
12 foreign commerce, recruited, enticed, harbored, transported, provided,
13 obtained, maintained, patronized, and solicited Victim 2, and benefitted
14 financially and by receiving anything of value from participation in a
15 venture, which recruited, enticed, harbored, transported, provided,
16 obtained, and maintained Victim 2, knowing and in reckless disregard of
17 the fact that means of force, threats of force, fraud, coercion, and any
18 combination of such means, would be used to cause Victim 2 to engage in
19 a commercial sex act; in violation of Title 18, United States Code,
20 Sections 1591(a)(1), 1591(a)(2) and 2 and Pinkerton v. United States,
21 328 U.S. 640 (1946).

22 Count 4

23 Sex Trafficking by Force, Fraud and Coercion

24 On or about August 2013, within the Southern District of California
25 and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark," and MATTHEW
26 ISAAC WOLFE, aka "Ben," knowingly, in and affecting interstate and
27 foreign commerce, recruited, enticed, harbored, transported, provided,
28 obtained, maintained, patronized, and solicited Victim 3, and benefitted

1 financially and by receiving anything of value from participation in a
2 venture, which recruited, enticed, harbored, transported, provided,
3 obtained, and maintained Victim 3, knowing and in reckless disregard of
4 the fact that means of force, threats of force, fraud, coercion, and any
5 combination of such means, would be used to cause Victim 3 to engage in
6 a commercial sex act; in violation of Title 18, United States Code,
7 Sections 1591(a)(1), 1591(a)(2) and 2 and Pinkerton v. United States,
8 328 U.S. 640 (1946).

9 Count 5

10 Sex Trafficking by Force, Fraud and Coercion

11 On or about October 2013, within the Southern District of California
12 and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark," and MATTHEW
13 ISAAC WOLFE, aka "Ben," knowingly, in and affecting interstate and
14 foreign commerce, recruited, enticed, harbored, transported, provided,
15 obtained, maintained, patronized, and solicited Victim 4, and benefitted
16 financially and by receiving anything of value from participation in a
17 venture, which recruited, enticed, harbored, transported, provided,
18 obtained, and maintained Victim 4, knowing and in reckless disregard of
19 the fact that means of force, threats of force, fraud, coercion, and any
20 combination of such means, would be used to cause Victim 4 to engage in
21 a commercial sex act; in violation of Title 18, United States Code,
22 Sections 1591(a)(1), 1591(a)(2) and 2 and Pinkerton v. United States,
23 328 U.S. 640 (1946).

24 Count 6

25 Sex Trafficking by Force, Fraud and Coercion

26 On or about October 2013, within the Southern District of California
27 and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark," and MATTHEW
28 ISAAC WOLFE, aka "Ben," knowingly, in and affecting interstate and

1 foreign commerce, recruited, enticed, harbored, transported, provided,
2 obtained, maintained, patronized, and solicited Victim 5, and benefitted
3 financially and by receiving anything of value from participation in a
4 venture, which recruited, enticed, harbored, transported, provided,
5 obtained, and maintained Victim 5, knowing and in reckless disregard of
6 the fact that means of force, threats of force, fraud, coercion, and any
7 combination of such means, would be used to cause Victim 5 to engage in
8 a commercial sex act; in violation of Title 18, United States Code,
9 Sections 1591(a)(1), 1591(a)(2) and 2 and Pinkerton v. United States,
10 328 U.S. 640 (1946).

11 Count 7

12 Sex Trafficking by Force, Fraud and Coercion

13 On or about November and December 2013, within the Southern District
14 of California and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark,"
15 and MATTHEW ISAAC WOLFE, aka "Ben," knowingly, in and affecting
16 interstate and foreign commerce, recruited, enticed, harbored,
17 transported, provided, obtained, maintained, patronized, and solicited
18 Victim 6, and benefitted financially and by receiving anything of value
19 from participation in a venture, which recruited, enticed, harbored,
20 transported, provided, obtained, and maintained Victim 6, knowing and
21 in reckless disregard of the fact that means of force, threats of force,
22 fraud, coercion, and any combination of such means, would be used to
23 cause Victim 6 to engage in a commercial sex act; in violation of
24 Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2) and 2 and
25 Pinkerton v. United States, 328 U.S. 640 (1946).

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1 Count 8

2 Sex Trafficking by Force, Fraud and Coercion

3 On or about February 2014, within the Southern District of
4 California and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark,"
5 and MATTHEW ISAAC WOLFE, aka "Ben," knowingly, in and affecting
6 interstate and foreign commerce, recruited, enticed, harbored,
7 transported, provided, obtained, maintained, patronized, and solicited
8 Victim 7, and benefitted financially and by receiving anything of value
9 from participation in a venture, which recruited, enticed, harbored,
10 transported, provided, obtained, and maintained Victim 7, knowing and
11 in reckless disregard of the fact that means of force, threats of force,
12 fraud, coercion, and any combination of such means, would be used to
13 cause Victim 7 to engage in a commercial sex act; in violation of
14 Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2) and 2
15 and Pinkerton v. United States, 328 U.S. 640 (1946).

16 Count 9

17 Sex Trafficking by Force, Fraud and Coercion

18 On or about November 2014, within the Southern District of
19 California and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark,"
20 and MATTHEW ISAAC WOLFE, aka "Ben," knowingly, in and affecting
21 interstate and foreign commerce, recruited, enticed, harbored,
22 transported, provided, obtained, maintained, patronized, and solicited
23 Victim 8, and benefitted financially and by receiving anything of value
24 from participation in a venture, which recruited, enticed, harbored,
25 transported, provided, obtained, and maintained Victim 8, knowing and
26 in reckless disregard of the fact that means of force, threats of force,
27 fraud, coercion, and any combination of such means, would be used to
28 cause Victim 8 to engage in a commercial sex act; in violation of

1 Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2) and 2 and
2 Pinkerton v. United States, 328 U.S. 640 (1946).

3 Count 10

4 Sex Trafficking by Force, Fraud and Coercion

5 On or about December 2014 and January 2015, within the Southern
6 District of California and elsewhere, defendants MICHAEL JAMES PRATT,
7 aka "Mark," and MATTHEW ISAAC WOLFE, aka "Ben," knowingly, in and
8 affecting interstate and foreign commerce, recruited, enticed, harbored,
9 transported, provided, obtained, maintained, patronized, and solicited
10 Victim 9, and benefitted financially and by receiving anything of value
11 from participation in a venture, which recruited, enticed, harbored,
12 transported, provided, obtained, and maintained Victim 9, knowing and
13 in reckless disregard of the fact that means of force, threats of force,
14 fraud, coercion, and any combination of such means, would be used to
15 cause Victim 9 to engage in a commercial sex act; in violation of
16 Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2) and 2 and
17 Pinkerton v. United States, 328 U.S. 640 (1946).

18 Count 11

19 Sex Trafficking by Force, Fraud and Coercion

20 On or about May 2015, within the Southern District of California
21 and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark," and MATTHEW
22 ISAAC WOLFE, aka "Ben," knowingly, in and affecting interstate and
23 foreign commerce, recruited, enticed, harbored, transported, provided,
24 obtained, maintained, patronized, and solicited Victim 10, and
25 benefitted financially and by receiving anything of value from
26 participation in a venture, which recruited, enticed, harbored,
27 transported, provided, obtained, and maintained Victim 10, knowing and
28 in reckless disregard of the fact that means of force, threats of force,

1 fraud, coercion, and any combination of such means, would be used to
2 cause Victim 10 to engage in a commercial sex act; in violation of Title
3 18, United States Code, Sections 1591(a)(1), 1591(a)(2) and 2 and
4 Pinkerton v. United States, 328 U.S. 640 (1946).

5 Count 12

6 Sex Trafficking by Force, Fraud and Coercion

7 On or about August 2015, within the Southern District of California
8 and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark," and MATTHEW
9 ISAAC WOLFE, aka "Ben," knowingly, in and affecting interstate and
10 foreign commerce, recruited, enticed, harbored, transported, provided,
11 obtained, maintained, patronized, and solicited Victim 11, and
12 benefitted financially and by receiving anything of value from
13 participation in a venture, which recruited, enticed, harbored,
14 transported, provided, obtained, and maintained Victim 11, knowing and
15 in reckless disregard of the fact that means of force, threats of force,
16 fraud, coercion, and any combination of such means, would be used to
17 cause Victim 11 to engage in a commercial sex act; in violation of
18 Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2) and 2 and
19 Pinkerton v. United States, 328 U.S. 640 (1946).

20 Count 13

21 Sex Trafficking by Force, Fraud and Coercion

22 On or about August 2015, within the Southern District of California
23 and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark," and MATTHEW
24 ISAAC WOLFE, aka "Ben," knowingly, in and affecting interstate and
25 foreign commerce, recruited, enticed, harbored, transported, provided,
26 obtained, maintained, patronized, and solicited Victim 12, and
27 benefitted financially and by receiving anything of value from
28 participation in a venture, which recruited, enticed, harbored,

1 transported, provided, obtained, and maintained Victim 12, knowing and
2 in reckless disregard of the fact that means of force, threats of force,
3 fraud, coercion, and any combination of such means, would be used to
4 cause Victim 12 to engage in a commercial sex act; in violation of
5 Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2) and 2
6 and Pinkerton v. United States, 328 U.S. 640 (1946).

7 Count 14

8 Sex Trafficking by Force, Fraud and Coercion

9 On or about October 2015, within the Southern District of California
10 and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark," and MATTHEW
11 ISAAC WOLFE, aka "Ben," knowingly, in and affecting interstate and
12 foreign commerce, recruited, enticed, harbored, transported, provided,
13 obtained, maintained, patronized, and solicited Victim 13, and
14 benefitted financially and by receiving anything of value from
15 participation in a venture, which recruited, enticed, harbored,
16 transported, provided, obtained, and maintained Victim 13, knowing and
17 in reckless disregard of the fact that means of force, threats of force,
18 fraud, coercion, and any combination of such means, would be used to
19 cause Victim 13 to engage in a commercial sex act; in violation of
20 Title 18, United States Code, Sections 1591(a)(1), 1591(a)(2) and 2
21 and Pinkerton v. United States, 328 U.S. 640 (1946).

22 Count 15

23 Sex Trafficking by Force, Fraud and Coercion

24 On or about January 2016, within the Southern District of California
25 and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark," and MATTHEW
26 ISAAC WOLFE, aka "Ben," knowingly recruited, enticed, harbored,
27 transported, provided, obtained, advertised, maintained, patronized, and
28 solicited Victim 14, and benefitted financially and by receiving

1 anything of value from participation in a venture, which recruited,
2 enticed, harbored, transported, provided, obtained, maintained,
3 patronized, and solicited Victim 14, knowing and in reckless disregard
4 of the fact that means of force, threats of force, fraud, coercion, and
5 any combination of such means, would be used to cause Victim 14 to engage
6 in a commercial sex act; in violation of Title 18, United States Code,
7 Sections 1591(a)(1), 1591(a)(2) and 2 and Pinkerton v. United States,
8 328 U.S. 640 (1946).

9 Count 16

10 Sex Trafficking by Force, Fraud and Coercion

11 On or about February 2016, within the Southern District of
12 California and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark,"
13 and MATTHEW ISAAC WOLFE, aka "Ben," knowingly, in and affecting
14 interstate and foreign commerce, recruited, enticed, harbored,
15 transported, provided, obtained, maintained, patronized, and solicited
16 Victim 15, and benefitted financially and by receiving anything of value
17 from participation in a venture, which recruited, enticed, harbored,
18 transported, provided, obtained, advertised, maintained, patronized, and
19 solicited Victim 15, knowing and in reckless disregard of the fact that
20 means of force, threats of force, fraud, coercion, and any combination
21 of such means, would be used to cause Victim 15 to engage in a commercial
22 sex act; in violation of Title 18, United States Code,
23 Sections 1591(a)(1), 1591(a)(2) and 2 and Pinkerton v. United States,
24 328 U.S. 640 (1946).

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1 Count 17

2 Production of Child Pornography

3 On or about September 2012, within the Southern District of
4 California and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark,"
5 and MATTHEW ISAAC WOLFE, aka "Ben," did attempt to employ, use, persuade,
6 induce, entice, and coerce a 16-year-old minor ("Minor Victim 1") to
7 engage in sexually explicit conduct for the purpose of producing any
8 visual depiction of such conduct, and the visual depiction was
9 transported using any means and facility of interstate and foreign
10 commerce or in and affecting interstate and foreign commerce; in
11 violation of Title 18, United States Code, Sections 2251(a) and (e)
12 and 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

13 Count 18

14 Sex Trafficking of a Minor and by Force, Fraud and Coercion

15 On or about September 2012, within the Southern District of
16 California and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark,"
17 and MATTHEW ISAAC WOLFE, aka "Ben," knowingly, in and affecting
18 interstate and foreign commerce, recruited, enticed, harbored,
19 transported, provided, obtained, and maintained Minor Victim 1, and
20 benefitted financially and by receiving anything of value from
21 participation in a venture, which recruited, enticed, harbored,
22 transported, provided, obtained, and maintained Minor Victim 1, knowing
23 and in reckless disregard of the fact that means of force, threats of
24 force, fraud, coercion, and any combination of such means, would be used
25 to cause Minor Victim 1 to engage in a commercial sex act, and having
26 had a reasonable opportunity to observe Minor Victim 1 and knowing and
27 in reckless disregard that Minor Victim 1 was under the age of 18 years
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1 old; in violation of Title 18, United States Code, Sections 1591(a)(1),
2 (a)(2) and (c) and 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

3 Count 19

4 Conspiracy to Launder Monetary Instruments

5 Beginning an unknown date, but no later than approximately 2012,
6 and continuing through October 9, 2019, within the Southern District of
7 California, and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark,"
8 and MATTHEW ISAAC WOLFE, aka "Ben," did knowingly and intentionally
9 conspire with other persons known and unknown to the grand jury to
10 launder monetary instruments, in violation of Title 18, United States
11 Code, Section 1956(h), to wit: to conduct financial transactions which
12 involved the proceeds of unlawful activity, that is, sex trafficking by
13 force, fraud and coercion, in violation of Title 18, United States Code,
14 Section 1591, knowing that the property involved in the financial
15 transaction represented the proceeds of some form of unlawful activity,
16 that is, sex trafficking by force, fraud and coercion, in violation of
17 Title 18, United States Code, Section 1591, with the intent to promote
18 the carrying on of the specified unlawful activity, that is, sex
19 trafficking by force, fraud and coercion, in violation of Title 18,
20 United States Code, Section 1591; in violation of Title 18, United States
21 Code, Sections 1956(a)(1)(A)(i) and 1956(h).

22 FORFEITURE ALLEGATIONS

23 The allegations contained in Counts 1 through 19 above are re-
24 alleged herein and incorporated as a part hereof for purposes of seeking
25 forfeiture of property of defendants MICHAEL JAMES PRATT, aka "Mark,"
26 and MATTHEW ISAAC WOLFE, aka "Ben," to the United States pursuant to
27 Title 18, United States Code, Sections 1594(d) and (e), Title 18, United
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1 States Code, Sections 2253(a)(2) and (3), and Title 18, United States
2 Code, Section 982(a)(1).

3 Upon conviction of the offenses in Counts 1 through 16, and 18,
4 which involve violations of Title 18, United States Code, Sections 1591
5 and 1594, defendants MICHAEL JAMES PRATT, aka "Mark," and MATTHEW ISAAC
6 WOLFE, aka "Ben," shall forfeit, pursuant to Title 18, United States
7 Code, Section 1594(d) and (e), all right, title, and interest in (1) any
8 property, real or personal, constituting or derived from, any proceeds
9 obtained, directly or indirectly, as a result of the offense; and (2)
10 any property, real or personal, used or intended to be used to commit
11 or to facilitate the commission of the offense; including but not limited
12 to the following:

13 (a) the domain name of girlsdoporn.com; and

14 (b) the domain name of girlsdotoy.com; and

15 (c) the domain name of beginmodeling.com.

16 Upon conviction of the offense in Count 17, which involve violations of
17 Title 18, United States Code, Section 2251(a) and 2251(e), defendants
18 MICHAEL JAMES PRATT, aka "Mark," and MATTHEW ISAAC WOLFE, aka "Ben,"
19 shall forfeit, pursuant to Title 18, United States Code,
20 Sections 2253(a)(2) and (3), all right, title, and interest in (1) any
21 property, real or personal, constituting or traceable to gross profits
22 or other proceeds obtained from the offense; and (2) any property, real
23 or personal, used or intended to be used to commit or to promote the
24 commission of the offense or any property traceable to such property.

25 Upon conviction of the offense in Count 19, which involve violation of
26 Title 18, United States Code, Section 1956(h), defendants MICHAEL JAMES
27 PRATT, aka "Mark," and MATTHEW ISAAC WOLFE, aka "Ben," shall forfeit,
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1 pursuant to Title 18, United States Code, Section 982(a)(1) all property
2 involved in the offense, and all property traceable to such property.

3 If any of the property described above, as a result of any act or
4 omission of defendants MICHAEL JAMES PRATT, aka "Mark," and MATTHEW
5 ISAAC WOLFE, aka "Ben," cannot be located upon the exercise of due
6 diligence; has been transferred or sold to, or deposited with, a third
7 party; has been placed beyond the jurisdiction of the court; has been
8 substantially diminished in value; or has been commingled with other
9 property which cannot be divided without difficulty, the United States
10 shall be entitled to forfeiture of substitute property up to the value
11 of the property described above, pursuant to Title 18, United States
12 Code, Sections 982(b) and 2253(b)(2), and Title 28, United States Code,
13 Section 2461(c).

14 All pursuant to Title 18, United States Code, Sections 982(a) and 982(b),
15 1594(d) and 2253(a) and 2253(b), and Title 28, United States Code,
16 Section 2461(c).

17 DATED: February 10, 2022.


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21 RANDY S. GROSSMAN
22 United States Attorney

23 By:


24 JOSEPH S. GREEN
25 ALEXANDRA F. FOSTER
26 Assistant U.S. Attorneys
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