

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
* APRIL 3, 2023 *
BROOKLYN OFFICE

LHE:GK/DL/JS
F.#2018R01401

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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Judge Diane Gujarati
Magistrate Judge Robert M. Levy

UNITED STATES OF AMERICA

INDICTMENT

- against -

Cr. No. 23-CR-146
(T. 18, U.S.C., §§ 1594(b) and 1594(d),
2 and 3551 et seq.; T. 21, U.S.C., § 853(p))

RACHEL CHERWITZ and
NICOLE DAEDONE,

Defendants.

----- X

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

I. The Defendants and Relevant Entities

1. OneTaste, Inc. was a privately-held California corporation with a principal place of business in San Francisco, California. OneTaste, Inc. and several affiliated companies, including but not limited to OneTaste NYC LLC, OneTaste NY Acquisition LLC, Mirror Clan Inc., One Taste Investments LLC, One Taste Holdings LLC, OneTaste Media LLC, Caravan Retreats Inc., OTBA Inc., Texas Limbic Network LLC, and The Next Right Thing LLC (collectively, "OneTaste") operated at variously points in locations within the Eastern District of New York and elsewhere, including but not limited to Brooklyn, New York; Manhattan, New York; San Francisco, California; Los Angeles, California; Denver, Colorado; Boulder, Colorado; Austin, Texas; and London, United Kingdom.

2. OneTaste promoted itself as a sexuality-focused wellness education company, which offered hands-on classes on “orgasmic meditation” (“OM”), a partnered practice typically involving the methodical stroking of a woman’s genitals for a period of fifteen minutes. OneTaste generated revenue by providing courses, coaching and events related to OM and other “wellness practices,” in exchange for a fee.

3. Individuals who associated themselves with OneTaste, either as employees, or as frequent participants in OneTaste courses and events, identified themselves as “members” of OneTaste.

4. The defendant NICOLE DAEDONE was a resident of San Francisco, California and New York, New York. DAEDONE was a co-founder of OneTaste and OneTaste’s Chief Executive Officer from approximately 2004 to 2017.

5. The defendant RACHEL CHERWITZ was a resident of San Francisco, California and New York, New York. CHERWITZ was OneTaste’s Head of Sales from approximately 2009 to 2018.

II. The Forced Labor Scheme

6. In or about and between 2006 and May 2018, the defendants, NICOLE DAEDONE and RACHEL CHERWITZ, together with others, obtained the labor and services of a group of OneTaste members by subjecting them to economic, sexual, emotional and psychological abuse; surveillance; indoctrination; and intimidation.

7. In furtherance of the scheme, the defendants NICOLE DAEDONE and RACHEL CHERWITZ, together with their co-conspirators, deployed a number of abusive and manipulative tactics in order to obtain the labor and services of these members. For example, DAEDONE, CHERWITZ and their co-conspirators:

(a) intentionally recruited individuals who had suffered prior trauma to participate in OneTaste, and advertised that OneTaste's courses and teachings could heal past sexual trauma and dysfunction;

(b) induced the OneTaste members, including OneTaste employees, to incur debt, and at times facilitated the OneTaste members in opening lines of credit, to finance expensive OneTaste courses that the defendants knew the OneTaste members could not afford;

(c) subjected the OneTaste members to constant surveillance in communal homes that OneTaste oversaw. DAEDONE, CHERWITZ and their co-conspirators further directed that the OneTaste members sleep in shared assigned beds and eat, work and travel in groups, as a means of rendering the OneTaste members dependent on OneTaste for their shelter and basic necessities and limiting the OneTaste members' independence and control;

(d) demanded absolute commitment to DAEDONE, including by exalting DAEDONE's teachings and ideology, and not tolerating dissent;

(e) collected sensitive information about the OneTaste members, including but not limited to information pertaining to the OneTaste members' prior trauma, sexual histories and relationships, as a means of influencing and controlling the OneTaste members; and

(f) isolated the OneTaste members by encouraging them to limit contact with people outside of the OneTaste community, and by breaking up established romantic relationships among the OneTaste members, as a means of rendering the OneTaste members emotionally, socially and psychologically dependent on OneTaste.

8. Upon securing the allegiance of the OneTaste members through, among others, the above tactics, the defendants NICOLE DAEDONE and RACHEL CHERWITZ,

together with their co-conspirators, then engaged in abusive employment practices. For example, DAEDONE, CHERWITZ and their co-conspirators promised to pay the OneTaste members wages and commissions for work performed on behalf of OneTaste and subsequently declined to pay the OneTaste members the amounts owed, or changed the OneTaste members' employment statuses or locations without advance notice, as a means of rendering the OneTaste members dependent on OneTaste for their livelihoods and financial wellbeing.

9. As part of their employment at OneTaste, some of the OneTaste members engaged in sexual activity at the direction of the defendants NICOLE DAEDONE and RACHEL CHERWITZ. For example, DAEDONE and CHERWITZ, together with their co-conspirators, recruited and groomed OneTaste members to engage in sexual acts with OneTaste's current and prospective investors, clients, employees and beneficiaries, for the financial benefit of OneTaste and, in turn, the defendants. DAEDONE and CHERWITZ also instructed the OneTaste members to engage in sexual acts they found uncomfortable or repulsive as a requirement to obtain "freedom" and "enlightenment" and demonstrate their commitment to OneTaste and DAEDONE.

10. Resistance to the directives of the defendants was not tolerated. The defendants NICOLE DAEDONE and RACHEL CHERWITZ subjected the OneTaste members to public shame, humiliation and workplace retaliation if they failed to adhere to the defendants' directives. Moreover, the defendants and their co-conspirators employed harassment and coercion to intimidate and attack OneTaste members perceived to be enemies and critics of DAEDONE and/or OneTaste.

FORCED LABOR CONSPIRACY

11. The allegations contained in paragraphs one through ten are realleged and incorporated as if fully set forth in this paragraph.

12. In or about and between 2006 and May 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants NICOLE DAEDONE and RACHEL CHERWITZ, together with others, did knowingly and intentionally conspire to:

(a) provide and obtain the labor and services of one or more persons by means of, and by a combination of means of: (i) force, threats of force, physical restraint and threats of physical restraint to a person; (ii) serious harm and threats of serious harm to a person; (iii) the abuse and threatened abuse of law and legal process; and (iv) one or more schemes, plans, and patterns intended to cause a person to believe that, if he or she did not perform such labor and services, a person would suffer serious harm and physical restraint, contrary to Title 18, United States Code, Section 1589(a); and

(b) benefit, financially and by receiving anything of value, from participation in a venture which has engaged in the providing or obtaining of labor or services by any such means, knowing, and in reckless disregard of the fact, that said venture had engaged in the providing and obtaining of labor and services by any such means, contrary to Title 18, United States Code, Section 1589(b).

(Title 18, United States Code, Section 1594(b); Title 18, United States Code, Sections 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

13. The United States hereby gives notice to the defendants, that, upon their conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 1594(d) of (a) any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offense, and any property traceable to such property; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense, or any property traceable to such property.

14. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 1594(d); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON

By Carolyn Pokorsy, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F#: 2018R01401
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

RACHEL CHERWITZ and NICOLE DAEDONE,

Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 1594(b), 1594(d), 2 and 3551 et seq.; T. 21, U.S.C.,
§ 853(p))

A true bill.

Deighton Reid
Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

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