

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA)	Criminal No.	3:15-CR-196 (TJM)
)		
v.)	Superseding Indictment (S1)	
)		
ANTONIO T. BALLARD,)	Violations:	18 U.S.C. §§ 1591(a)(1),
a/k/a "Tone",)		(b)(1), (b)(2) & (c) [Sex
)		Trafficking Of A Child]
)		
)		18 U.S.C. §§ 1591(a)(2),
)		(b)(1), (b)(2) & (c) [Sex
)		Trafficking Of A Child]
)		
)		18 U.S.C. § 2422(b)
)		[Persuading And Inducing A
)		Child To Engage In
)		Prostitution]
)		
)		
)		
)		
)		
)	9 Counts	
)		
Defendant.)	County of Offense:	Broome

THE GRAND JURY CHARGES:

**COUNT 1
[Sex Trafficking Of A Child]**

From in or about August of 2014 through in or about December of 2014, in Broome County in the Northern District of New York and elsewhere, defendant **ANTONIO T. BALLARD** knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person with the initials, T.M., a minor under the age of 18, knowing and in reckless disregard of the fact that means of force, threats of force and coercion and a combination of such means would be used to cause T.M. to

engage in a commercial sex act; knowing and in reckless disregard of the fact that T.M. would be caused to engage in a commercial sex act; knowing and in reckless disregard of the fact that T.M. had not attained the age of 18 years; and having had had a reasonable opportunity to observe T.M., in violation of Title 18, United States Code, Sections 1591(a)(1) & (c). That violation was effected by means of force, threats of force, and coercion, in violation of Title 18, United States Code, Section 1591(b)(1) and the person recruited, enticed, harbored, transported, provided, and obtained had attained the age of 14 years, but had not attained the age of 18 years at the time of the offence, in violation of Title 18, United States Code, Section 1591(b)(2).

COUNT 2
[Sex Trafficking Of A Child]

From in or about August of 2014 through in or about December of 2014, in Broome County in the Northern District of New York and elsewhere, defendant **ANTONIO T. BALLARD** knowingly benefitted, financially and by receiving a thing of value, from participation in a venture which had engaged in an act described in violation of Title 18, United States Code, Section 1591(a)(1) knowing and in reckless disregard of the fact that means of force, threats of force and coercion and a combination of such means would be used to cause T.M. to engage in a commercial sex act; knowing and in reckless disregard of the fact that T.M. would be caused to engage in a commercial sex act; knowing and in reckless disregard of the fact that T.M. had not attained the age of 18 years; and having had had a reasonable opportunity to observe T.M., in violation of Title 18, United States Code, Sections 1591(a)(2) & (c). That violation was effected by means of force, threats of force, and coercion, in violation of Title 18, United States Code, Section 1591(b)(1) and the person recruited, enticed, harbored, transported, provided, and obtained had attained the age of 14 years, but had not attained the age of 18 years at the time of the offence, in violation of Title 18, United States Code, Section 1591(b)(2).

COUNT 3
[Persuading And Inducing A Child To Engage In Prostitution]

From in or about August of 2014 through in or about December of 2014, in Broome County in the Northern District of New York and elsewhere, defendant **ANTONIO T. BALLARD**, while using a means and facility of interstate commerce, knowingly persuaded, induced, enticed, and coerced an individual who had not attained the age of 18 years, that is T.M., to engage in prostitution, in violation of Title 18, United States Code, Section 2422(b).

COUNT 4
[Sex Trafficking Of A Child]

From in or about September of 2014 through in or about December of 2014, in Broome County in the Northern District of New York and elsewhere, defendant **ANTONIO T. BALLARD** knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person with the initials, A.W., a minor under the age of 18, knowing and in reckless disregard of the fact that A.W. would be caused to engage in a commercial sex act; knowing and in reckless disregard of the fact that A.W. had not attained the age of 18 years; and having had had a reasonable opportunity to observe A.W., in violation of Title 18, United States Code, Sections 1591(a)(1) & (c). The person recruited, enticed, harbored, transported, provided, and obtained had attained the age of 14 years, but had not attained the age of 18 years at the time of the offence, in violation of Title 18, United States Code, Section 1591(b)(2).

COUNT 5
[Sex Trafficking Of A Child]

From in or about September of 2014 through in or about December of 2014, in Broome County in the Northern District of New York and elsewhere, defendant **ANTONIO T. BALLARD** knowingly benefitted, financially and by receiving a thing of value, from

participation in a venture which had engaged in an act described in violation of Title 18, United States Code, Section 1591(a)(1) knowing and in reckless disregard of the fact that A.W. would be caused to engage in a commercial sex act; knowing and in reckless disregard of the fact that A.W. had not attained the age of 18 years; and having had had a reasonable opportunity to observe A.W., in violation of Title 18, United States Code, Sections 1591(a)(2) & (c). The person recruited, enticed, harbored, transported, provided, and obtained had attained the age of 14 years, but had not attained the age of 18 years at the time of the offence, in violation of Title 18, United States Code, Section 1591(b)(2).

COUNT 6
[Persuading And Inducing A Child To Engage In Prostitution]

From in or about September of 2014 through in or about December of 2014, in Broome County in the Northern District of New York and elsewhere, defendant **ANTONIO T. BALLARD**, while using a means and facility of interstate commerce, knowingly persuaded, induced, enticed, and coerced an individual who had not attained the age of 18 years, that is A.W., to engage in prostitution, in violation of Title 18, United States Code, Section 2422(b).

COUNT 7
[Sex Trafficking Of A Child]

From in or about September of 2014 through in or about December of 2014, in Broome County in the Northern District of New York and elsewhere, defendant **ANTONIO T. BALLARD** knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person with the initials, A.G., a minor under the age of 18, knowing and in reckless disregard of the fact that A.G. would be caused to engage in a commercial sex act; knowing and in reckless disregard of the fact that A.G. had not attained the age of 18 years; and having had had a reasonable opportunity to observe

A.G., in violation of Title 18, United States Code, Sections 1591(a)(1) & (c). The person recruited, enticed, harbored, transported, provided, and obtained had attained the age of 14 years, but had not attained the age of 18 years at the time of the offence, in violation of Title 18, United States Code, Section 1591(b)(2).

COUNT 8
[Sex Trafficking Of A Child]

From in or about September of 2014 through in or about December of 2014, in Broome County in the Northern District of New York and elsewhere, defendant **ANTONIO T. BALLARD** knowingly benefitted, financially and by receiving a thing of value, from participation in a venture which had engaged in an act described in violation of Title 18, United States Code, Section 1591(a)(1) knowing and in reckless disregard of the fact that A.G. would be caused to engage in a commercial sex act; knowing and in reckless disregard of the fact that A.G. had not attained the age of 18 years; and having had had a reasonable opportunity to observe A.G., in violation of Title 18, United States Code, Sections 1591(a)(2) & (c). The person recruited, enticed, harbored, transported, provided, and obtained had attained the age of 14 years, but had not attained the age of 18 years at the time of the offence, in violation of Title 18, United States Code, Section 1591(b)(2).

COUNT 9
[Persuading And Inducing A Child To Engage In Prostitution]

From in or about September of 2014 through in or about December of 2014, in Broome County in the Northern District of New York and elsewhere, defendant **ANTONIO T. BALLARD**, while using a means and facility of interstate commerce, knowingly persuaded, induced, enticed, and coerced an individual who had not attained the age of 18 years, that is A.G., to engage in prostitution, in violation of Title 18, United States Code, Section 2422(b).

Dated: October 7, 2015

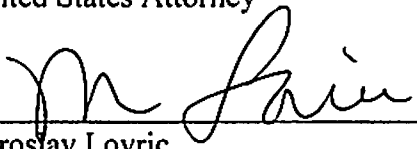
A TRUE BILL,

REDACTED


Grand Jury Foreperson

RICHARD S. HARTUNIAN
United States Attorney

By:


Miroslav Lovric
Assistant United States Attorney
Bar Roll No. 301490