

UNSEALED PER ORDER OF COURT

11/8/19 dj

~~SEALED~~

FILED

2019 NOV -6 P 3:18

CLERK, U.S. DISTRICT COURT  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

January 2019 Grand Jury

7 UNITED STATES OF AMERICA,  
8 Plaintiff,

9 v.

10 MICHAEL JAMES PRATT (1),  
11 aka "Mark,"  
12 MATTHEW ISAAC WOLFE (2),  
13 aka "Ben,"  
14 RUBEN ANDRE GARCIA (3),  
15 aka "Jonathan,"  
16 THEODORE WILFRED GYI (4),  
17 aka "Teddy,"  
18 VALORIE MOSER (5),  
19 AMBERLYN DEE NORED (6),  
20 aka "Amberlyn Clark,"  
21 Defendants.

Case No. **19 CR 4488 JLS**

I N D I C T M E N T

Title 18, U.S.C., Secs. 1594(c) and 1591(a)(1) and (2) - Conspiracy to Commit 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. 1591(a)(1) and (2) - Sex Trafficking by Force, Fraud and Coercion; Title 18, U.S.C., Sec. 1594(d) and (e), and Title 18, U.S.C., Sec. 2253(a)(2), (a)(3) and (b), and Title 28, U.S.C., Sec. 2461(c) - Criminal Forfeiture

22 The grand jury charges:

23 Count 1

24 Conspiracy to Commit  
25 Sex Trafficking by Force, Fraud and Coercion

26 Beginning on an unknown date, but no later than approximately 2012,  
27 and continuing through October 9, 2019, within the Southern District of  
28 California and elsewhere, defendants MICHAEL JAMES PRATT, aka "Mark,"  
MATTHEW ISAAC WOLFE, aka "Ben," RUBEN ANDRE GARCIA, aka "Jonathan,"  
THEODORE WILFRED GYI, aka "Teddy," VALORIE MOSER, and AMBERLYN DEE NORED,  
aka "Amberlyn Clark," conspired and agreed with each other to knowingly,  
in and affecting interstate and foreign commerce, recruit, entice,

1 harbor, transport, provide, obtain, advertise, maintain, patronize, and  
2 solicit by any means a person - to wit, Victim 1, Victim 2, Victim 3,  
3 Victim 4, Victim 5 and others - knowing and in reckless disregard of  
4 the fact that means of force, threats of force, fraud, coercion, and  
5 any combination of such means, would be used to cause these persons to  
6 engage in a commercial sex act, and to benefit financially and receive  
7 anything of value from participation in a venture engaged in such acts,  
8 in violation of Title 18, United States Code, Section 1591(a).

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

10 Count 2

11 Production of Child Pornography

12 On or about September 1, 2012, within the Southern District of  
13 California and elsewhere, defendant MICHAEL JAMES PRATT, aka "Mark,"  
14 did attempt to employ, use, persuade, induce, entice, and coerce a  
15 16-year-old minor ("Minor Victim 1") to engage in sexually explicit  
16 conduct for the purpose of producing any visual depiction of such  
17 conduct, and the visual depiction was transported using any means and  
18 facility of interstate and foreign commerce or in and affecting  
19 interstate and foreign commerce; in violation of Title 18, United States  
20 Code, Section 2251(a) and (e).

21 Count 3

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

23 On or about September 1, 2012, within the Southern District of  
24 California and elsewhere, defendant MICHAEL JAMES PRATT, aka "Mark,"  
25 knowingly, in and affecting interstate and foreign commerce, recruited,  
26 enticed, harbored, transported, provided, obtained, and maintained Minor  
27 Victim 1, and benefitted financially and by receiving anything of value  
28 from participation in a venture, which recruited, enticed, harbored,  
transported, provided, obtained, and maintained Minor Victim 1, knowing

1 and in reckless disregard of the fact that means of force, threats of  
2 force, fraud, coercion, and any combination of such means, would be used  
3 to cause Minor Victim 1 to engage in a commercial sex act, and having  
4 had a reasonable opportunity to observe Minor Victim 1 and knowing and  
5 in reckless disregard that Minor Victim 1 was under the age of 18 years  
6 old; in violation of Title 18, United States Code, Section 1591(a)(1),  
7 (a)(2) and (c).

8 Count 4

9 Sex Trafficking by Force, Fraud and Coercion

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

22 Count 5

23 Sex Trafficking by Force, Fraud and Coercion

24 On or about October 2013, within the Southern District of California  
25 and elsewhere, MICHAEL JAMES PRATT, aka "Mark," and RUBEN ANDRE GARCIA,  
26 aka "Jonathan," knowingly, in and affecting interstate and foreign  
27 commerce, recruited, enticed, harbored, transported, provided, obtained,  
28 maintained, patronized, and solicited Victim 2, and benefitted  
financially and by receiving anything of value from participation in a

1 venture, which recruited, enticed, harbored, transported, provided,  
2 obtained, and maintained Victim 2, knowing and in reckless disregard of  
3 the fact that means of force, threats of force, fraud, coercion, and  
4 any combination of such means, would be used to cause Victim 2 to engage  
5 in a commercial sex act; in violation of Title 18, United States Code,  
6 Section 1591(a)(1) and (2).

7 Count 6

8 Sex Trafficking by Force, Fraud and Coercion

9 On or about January 2015, within the Southern District of California  
10 and elsewhere, MICHAEL JAMES PRATT, aka "Mark," MATTHEW ISAAC WOLFE,  
11 aka "Ben," and RUBEN ANDRE GARCIA, aka "Jonathan," knowingly, in and  
12 affecting interstate and foreign commerce, recruited, enticed, harbored,  
13 transported, provided, obtained, maintained, patronized, and solicited  
14 Victim 3, and benefitted financially and by receiving anything of value  
15 from participation in a venture, which recruited, enticed, harbored,  
16 transported, provided, obtained, and maintained Victim 3, 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 3 to engage in a commercial sex act; in violation of  
20 Title 18, United States Code, Section 1591(a)(1) and (2).

21 Count 7

22 Sex Trafficking by Force, Fraud and Coercion

23 On or about February 2016, within the Southern District of  
24 California and elsewhere, MICHAEL JAMES PRATT, aka "Mark," RUBEN ANDRE  
25 GARCIA, aka "Jonathan," and THEODORE WILFRED GYI, aka "Teddy,"  
26 knowingly, in and affecting interstate and foreign commerce, recruited,  
27 enticed, harbored, transported, provided, obtained, maintained,  
28 patronized, and solicited Victim 4, and benefitted financially and by  
receiving anything of value from participation in a venture, which

1 recruited, enticed, harbored, transported, provided, obtained,  
2 advertised, maintained, patronized, and solicited Victim 4, knowing and  
3 in reckless disregard of the fact that means of force, threats of force,  
4 fraud, coercion, and any combination of such means, would be used to  
5 cause Victim 4 to engage in a commercial sex act; in violation of  
6 Title 18, United States Code, Section 1591(a)(1) and (2).

7  
8 Count 8

9 Sex Trafficking by Force, Fraud and Coercion

10 On or about January 2016, within the Southern District of California  
11 and elsewhere, MICHAEL JAMES PRATT, aka "Mark," RUBEN ANDRE GARCIA,  
12 aka "Jonathan," and THEODORE WILFRED GYI, aka "Teddy," knowingly  
13 recruited, enticed, harbored, transported, provided, obtained,  
14 advertised, maintained, patronized, and solicited Victim 5, and  
15 benefitted financially and by receiving anything of value from  
16 participation in a venture, which recruited, enticed, harbored,  
17 transported, provided, obtained, maintained, patronized, and solicited  
18 Victim 5, knowing and in reckless disregard of the fact that means of  
19 force, threats of force, fraud, coercion, and any combination of such  
20 means, would be used to cause Victim 5 to engage in a commercial sex  
21 act; in violation of Title 18, United States Code, Section 1591(a)(1)  
22 and (2).

23 FORFEITURE ALLEGATIONS

24 The allegations contained in Counts 1 through 8 above are re-  
25 alleged herein and incorporated as a part hereof for purposes of seeking  
26 forfeiture of property of defendants MICHAEL JAMES PRATT, aka "Mark,"  
27 MATTHEW ISAAC WOLFE, aka "Ben," RUBEN ANDRE GARCIA, aka "Jonathan,"  
28 THEODORE WILFRED GYI, aka "Teddy," VALORIE MOSER, and AMBERLYN DEE NORED,  
aka "Amberlyn Clark," to the United States pursuant to Title 18, United

1 States Code, Section 1594(d) and (e), and Title 18, United States Code,  
2 Section 2253(a)(2) and (3).

3       Upon conviction of the offenses in Counts 1, and 3 through 8, which  
4 involve violations of Title 18, United States Code, Sections 1591  
5 and 1594, defendants MICHAEL JAMES PRATT, aka "Mark," MATTHEW ISAAC  
6 WOLFE, aka "Ben," RUBEN ANDRE GARCIA, aka "Jonathan," THEODORE WILFRED  
7 GYI, aka "Teddy," VALORIE MOSER, and AMBERLYN DEE NORED, aka "Amberlyn  
8 Clark," shall forfeit, pursuant to Title 18, United States Code,  
9 Section 1594(d) and (e), all right, title, and interest in (1) any  
10 property, real or personal, constituting or derived from, any proceeds  
11 obtained, directly or indirectly, as a result of the offense; and (2) any  
12 property, real or personal, used or intended to be used to commit or to  
13 facilitate the commission of the offense. The property to be forfeited  
14 includes, but is not limited to the following:

- 15       (a) the domain name of girlsdoporn.com; and
- 16       (b) the domain name of girlsdotoys.com; and
- 17       (c) the domain name of beginmodeling.com.

18       Upon conviction of the offense in Count 2, which involves a  
19 violation of Title 18, United States Code, Section 2251(a) and 2251(e),  
20 defendants MICHAEL JAMES PRATT, aka "Mark," MATTHEW ISAAC WOLFE,  
21 aka "Ben," RUBEN ANDRE GARCIA, aka "Jonathan," THEODORE WILFRED GYI,  
22 aka "Teddy," VALORIE MOSER, and AMBERLYN DEE NORED, aka "Amberlyn  
23 Clark," shall forfeit, pursuant to Title 18, United States Code,  
24 Section 2253(a)(2) and (3), all right, title, and interest in: (1) all  
25 visual depictions described in Section 2251; (2) any property, real or  
26 personal, constituting or traceable to gross profits or other proceeds  
27 obtained from the offense; and (3) any property, real or personal, used

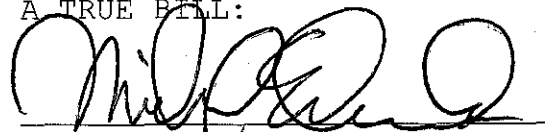
28

1 or intended to be used to commit or to promote the commission of the  
2 offense or any 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," MATTHEW ISAAC  
5 WOLFE, aka "Ben," RUBEN ANDRE GARCIA, aka "Jonathan," THEODORE WILFRED  
6 GYI, aka "Teddy," VALORIE MOSER, and AMBERLYN DEE NORED, aka "Amberlyn  
7 Clark," cannot be located upon the exercise of due diligence; has been  
8 transferred or sold to, or deposited with, a third party; has been placed  
9 beyond the jurisdiction of the court; has been substantially diminished  
10 in value; or has been commingled with other property which cannot be  
11 divided without difficulty, the United States shall be entitled to  
12 forfeiture of substitute property up to the value of the property  
13 described above, pursuant to Title 28, United States Code,  
14 Section 2461(c), and Title 18, United States Code, Section 2253(b).  
15 All violation of Title 18, United States Code, Section 1594(d) and (e),  
16 Title 18, United States Code, Section 2253(a)(2), (a)(3), and (b), and  
17 Title 28, United States Code, Section 2461(c).

18 DATED: November 6, 2019.

19 A TRUE BILL:

20   
21 Foreperson

22 ROBERT S. BREWER, JR.  
23 United States Attorney

24 By:   
25 JOSEPH S. GREEN  
26 Assistant U.S. Attorney

27 By:   
28 ALEXANDRA F. FOSTER  
Assistant U.S. Attorney