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DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
OCT 12 2016
CLERK, U.S. DISTRICT COURT
By _____
Deputy

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:16-CR-245-0

- CHAD JOHNSON
- a/k/a "OCHO HOOD FAME" (01)
- DIWONE NOBLES
- a/k/a "POOH" (02)
- AUDRY LANE
- a/k/a "SPUD" (03)
- DEON BONNER
- a/k/a "SPANISH FLY" (04)
- STANLEY JOHNSON
- a/k/a "PEE WEE" (05)
- KATELYN MICHELLE WARD
- a/k/a "KD" (06)

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Commit Sex Trafficking

(Violation of 18 U.S.C. § 1594(c) (18 U.S.C. §§ 1591(a)(1) and (a)(2))

Beginning before June 1, 2013, and continuing through on or about July 21, 2016, in the Fort Worth Division of the Northern District of Texas and elsewhere, the defendants, **Chad Johnson**, also known as Ocho Hood Fame, **Diwone Nobles**, also known as Pooh, **Audry Lane**, also known as Spud, **Deon Bonner**, also known as Spanish Fly, **Stanley Johnson**, also known as Pee Wee, and **Katelyn Michelle Ward**, also known as KD, along with others known and unknown to the grand jury, conspired and agreed with each other to

knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain or maintain by any means, and benefit, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained and maintained the following individuals, as well as others, Jane Doe 1, Jane Doe 5, AV1, AV2, AV3 and/or AV4, knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion, and any combination of such means would be used to cause Jane Doe 1, Jane Doe 5, AV1, AV2, AV3 and/or AV4 to engage in commercial sex acts, and knowing or in reckless disregard of the fact that Jane Doe 1, Jane Doe 2, Jane Doe 4 and/or Jane Doe 5 had not attained the age of 18 years, and having had a reasonable opportunity to observe Jane Doe 1, Jane Doe 2, Jane Doe 4 and/or Jane Doe 5, and that they would be caused to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(1) and (a)(2).

All in violation of 18 U.S.C. § 1594(c) (18 U.S.C. §§ 1591(a)(1) and (a)(2))

Count Two

Sex Trafficking Through Force, Fraud or Coercion
(Violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1))

Beginning in or before 2011, and continuing through on or about June 1, 2016, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendant **Audry Lane**, also known as Spud, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain and maintain by any means, AV3, knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion and any combination of such means would be used to cause AV3 to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1).

Count Three
Sex Trafficking of Children
(Violation of 18 U.S.C. §§ 1591(a)(1) and (b)(2))

Beginning on or before June 1, 2013, and continuing through on or about February 18, 2014, in the Fort Worth Division of the Northern District of Texas and elsewhere, the defendant, **Audry Lane**, also known as Spud, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain and maintain by any means, Jane Doe 4, who had not attained the age of 18 years, and having had a reasonable opportunity to observe Jane Doe 4, and knowing and in reckless disregard of the fact that Jane Doe 4 had not attained the age of 18 years and that Jane Doe 4 would be caused to engage in a commercial sex act,

In violation of 18 U.S.C. §§ 1591(a)(1) and (b)(2).

Count Four
Sex Trafficking Through Force, Fraud or Coercion
(Violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1))

Beginning on or before January 7, 2014, and continuing through approximately June 1, 2015, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendant **Audry Lane**, also known as Spud, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain and maintain by any means, AV1, knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion and any combination of such means would be used to cause AV1 to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1) and (b)(2).

Count Five

Sex Trafficking Through Force, Fraud or Coercion
(Violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1))

From on or about January 7, 2014 through approximately June 1, 2015, the exact dates being unknown to the grand jury, in the Ft. Worth Division of the Northern District of Texas, and elsewhere, the defendant, **Diwone Nobles**, also known as Pooh, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain and maintain by any means, AV1, knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion and any combination of such means would be used to cause AV1 to engage in a commercial sex act,

In violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1).

Count Six

Sex Trafficking Through Force, Fraud or Coercion
(Violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1))

Beginning on or before January 7, 2014, and continuing through approximately June 1, 2015, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendant **Chad Johnson**, also known as Ocho Hood Fame, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain and maintain by any means, AV1, knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion and any combination of such means would be used to cause AV1 to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1).

Count Seven

Sex Trafficking Through Force, Fraud or Coercion
(Violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1))

Beginning on or before August 1, 2014, and continuing through approximately April 1, 2016, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendant **Chad Johnson**, also known as Ocho Hood Fame, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain and maintain by any means, AV2, knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion and any combination of such means would be used to cause AV2 to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1).

Count Eight

Sex Trafficking of Children and Through Force, Fraud or Coercion
(Violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1) and (b)(2))

Beginning on or before October 1, 2015, and continuing through on or about November 15, 2015, in the Fort Worth Division of the Northern District of Texas and elsewhere, the defendant, **Diwone Nobles**, also known as Pooh, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain and maintain by any means, Jane Doe 5, knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion and any combination of such means would be used to cause Jane Doe 5 to engage in a commercial sex act, and knowing and in reckless disregard of the fact that Jane Doe 5 had not attained the age of 18 years, and having had a reasonable opportunity to observe Jane Doe 5, and that Jane Doe 5 would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1) and (b)(2).

Count Nine

Sex Trafficking of Children and Through Force, Fraud or Coercion
(Violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1) and (b)(2))

Beginning on or before October 1, 2015, and continuing through on or about November 15, 2015, in the Fort Worth Division of the Northern District of Texas and elsewhere, the defendant, **Chad Johnson**, also known as Ocho Hood Fame, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain and maintain by any means, Jane Doe 5, knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion and any combination of such means would be used to cause Jane Doe 5 to engage in a commercial sex act, and knowing and in reckless disregard of the fact that Jane Doe 5 had not attained the age of 18 years, and having had a reasonable opportunity to observe Jane Doe 5, and that Jane Doe 5 would be caused to engage in a commercial sex act,

In violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1) and (b)(2).

Count Ten
Sex Trafficking of Children
(Violation of 18 U.S.C. §§ 1591(a)(1) and (b)(2))

Beginning on or before October 12, 2015, and continuing through October 26, 2015, in the Fort Worth Division of the Northern District of Texas and elsewhere, the defendant, **Deon Bonner**, also known as Spanish Fly, knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained or maintained by any means, Jane Doe 1, who had not attained the age of 18 years, and having had a reasonable opportunity to observe Jane Doe 1, and knowing and in reckless disregard of the fact that Jane Doe 1 had not attained the age of 18 years and that Jane Doe 1 would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1) and (b)(2).

Count Eleven
Sex Trafficking of Children
(Violation of 18 U.S.C. §§ 1591(a)(1) and (b)(2))

Beginning on or before October 26, 2015, and continuing through on or about October 28, 2015, in the Fort Worth Division of the Northern District of Texas and elsewhere, the defendant, **Chad Johnson**, also known as Ocho Hood Fame, knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained or maintained by any means, Jane Doe 1, who had not attained the age of 18 years, and having had a reasonable opportunity to observe Jane Doe 1, and knowing and in reckless disregard of the fact that Jane Doe 1 had not attained the age of 18 years and that Jane Doe 1 would be caused to engage in a commercial sex act,

In violation of 18 U.S.C. §§ 1591(a)(1) and (b)(2).

Count Twelve

Sex Trafficking of Children and Through Force, Fraud or Coercion
(Violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1) and (b)(2))

Beginning on or before October 28, 2015, and continuing through on or about November 15, 2015, in the Fort Worth Division of the Northern District of Texas and elsewhere, the defendant, **Diwone Nobles**, also known as Pooh, knowingly, in an affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain and maintain by any means, Jane Doe 1, knowing and in reckless disregard of the fact that force, threats of force, fraud and coercion and any combination of such means would be used to cause Jane Doe 1 to engage in a commercial sex act, and knowing and in reckless disregard of the fact that Jane Doe 1 had not attained the age of 18 years, and having had a reasonable opportunity to observe Jane Doe 1, and that Jane Doe 1 would be caused to engage in a commercial sex act.

In violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1) and (b)(2).

Count Thirteen
Sex Trafficking of Children
(Violation of 18 U.S.C. §§ 1591(a)(1) and (b)(2))

From on or about October 12, 2015, and continuing through on or about November 5, 2015, in the Fort Worth Division of the Northern District of Texas and elsewhere, the defendant, **Stanley Johnson**, also known as Pee Wee, knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained or maintained by any means, Jane Doe 2, who had not attained the age of 18 years, and having had a reasonable opportunity to observe Jane Doe 2, and knowing and in reckless disregard of the fact that Jane Doe 2 had not attained the age of 18 years and that Jane Doe 2 would be caused to engage in a commercial sex act,

In violation of 18 U.S.C. §§ 1591(a)(1) and (b)(2).

Forfeiture Notice
(18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

Upon conviction for the offenses alleged in Counts One through Thirteen of this Indictment and pursuant to 18 U.S.C. § 1594(d), the defendants, **Chad Johnson**, also known as Ocho Hood Fame, **Diwone Nobles**, also known as Pooh, **Audry Lane**, also known as Spud, **Deon Bonner**, also known as Spanish Fly, **Stanley Johnson**, also known as Pee Wee, and **Katelyn Michelle Ward**, also known as KD, shall forfeit to the United States any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violations and any property, real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such violations.

A TRUE BILL.



FOREPERSON

JOHN R. PARKER
UNITED STATES ATTORNEY



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Indictment - Page 15

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

THE UNITED STATES OF AMERICA

v.

DEON BONNER
a/k/a "Spanish Fly" (01)
CHAD JOHNSON
a/k/a "Ocho Hood Fame" (02)
STANLEY JOHNSON
a/k/a "Pee Wee" (03)
ALVIN LANE
a/k/a "Spank" (04)
AUDRY LANE
a/k/a "Spud" (05)
DIWONE NOBLES
a/k/a "Pooh" (06)
KATELYN MICHELLE WARD
a/k/a "KD" (07)

INDICTMENT

18 U.S.C. § 1594(c) (18 U.S.C. §§ 1591(a)(1) and (a)(2))
Conspiracy to Commit Sex Trafficking
(COUNT 1)

18 U.S.C. §§ 1591(a)(1) and (b)(1)
Sex Trafficking Through Force, Fraud or Coercion
(COUNTS 2, 4, 5, 6, 7)

18 U.S.C. §§ 1591(a) and (b)(2)
Sex Trafficking of Children
(COUNTS 3, 10, 11, 13)

18 U.S.C. §§ 1591(a)(1) and (b)(1) and (b)(2)
Sex Trafficking of Children and Through Force, Fraud or Coercion
(COUNTS 8, 9, 12)

18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)
Forfeiture Notice

A true bill rendered

FORT WORTH



FOREPERSON

Filed in open court this 12th day of October, 2016.

Defendants 1-5 in Custody
Warrant to be Issued for Katelyn Ward (6)



UNITED STATES MAGISTRATE JUDGE

Magistrate Court Number:

4:16-MJ-420 as to Defendants 1-5