

ORIGINAL

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES N. HATTEN, Clerk
By: *Angela J. Smith*
Deputy Clerk

UNITED STATES OF AMERICA

v.

TRAVIS SENTALL ROBINSON,
a.k.a. "Triggaplay," a.k.a. "Trigga,"
and
LADRIGUS DONDREA STUCKEY,
a.k.a. "Dreek," and KOREN GIBBS
a.k.a. "Bianca Haynes."

Criminal Indictment

No. 1:14-cr-0176-RWS-JSA

(First Superseding)

THE GRAND JURY CHARGES THAT:

COUNT ONE

Beginning on a date unknown to the grand jury, but at least by in or about August 2013, and continuing until at least in or about May 2014, in the Northern District of Georgia and elsewhere, the defendants, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," Ladrigus Dondrea Stuckey, a.k.a. "Dreek," and Koren Gibbs a.k.a. "Bianca Haynes," and others known and unknown to the grand jury, did combine, conspire, confederate, agree, and have a tacit understanding to knowingly and willfully recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, J.R., D.A., A.W., K.C., L.W., A.G., and M.M., a minor under the age of 18 years, knowing and in reckless disregard of the fact that M.M. had not attained the age of 18 years and would be caused to engage in a commercial sex

act, and knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, as defined in Title 18, United States Code, Section 1591(e)(2), would be used to cause J.R., D.A., A.W., K.C., L.W., A.G., and M.M., to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a)(1).

OVERVIEW OF THE CONSPIRACY

The defendants committed numerous acts as part of the conspiracy, including, but not limited to, those described below:

1. Defendant Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," ran a commercial sex operation called the "Queen of Diamonds," and referred to himself as the "King of Diamonds."

2. Defendant Ladrigus Dondrea Stuckey, a.k.a. "Dreek," acted as the enforcer for the organization in that he prevented the young women within the organization from trying to leave.

3. Defendant Koren Gibbs, a.k.a. "Bianca Haynes," assisted Defendant Travis Sentall Robinson a.k.a. "Triggaplay," a.k.a. "Trigga," in recruiting and maintaining young women in the "Queen of Diamonds" organization.

4. Defendants Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," Ladrigus Dondrea Stuckey, a.k.a. "Dreek," and Koren Gibbs a.k.a. "Bianca Haynes," forced or attempted to force J.R., D.A., M.M., A.W., K.C., L.W., and A.G. to engage in commercial sex acts for the defendants' financial gain.

5. Defendants Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga" and Koren Gibbs, a.k.a. "Bianca Haynes," used electronic devices, including

cellular telephones and computers, to post photographs of J.R., D.A., M.M., A.W., L.W., and A.G. in escort and erotic classified advertisement sections of Internet websites such as Backpage.com for the purpose of causing the young women to engage in commercial sex acts.

6. Defendants Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," Ladrigus Dondrea Stuckey, a.k.a. "Dreek," and Koren Gibbs, a.k.a. "Bianca Haynes," transported J.R., D.A., M.M., A.W., K.C., L.W., and A.G. to various states, including New York, Louisiana, South Carolina, Indiana, and Illinois for the purpose of causing the young women to engage in commercial sex acts.

7. Defendants Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," Ladrigus Dondrea Stuckey, a.k.a. "Dreek," and Koren Gibbs, a.k.a. "Bianca Haynes," utilized various hotels involved in interstate commerce in the Atlanta, Georgia area and elsewhere to cause or attempt to cause J.R., D.A., M.M., A.W., K.C., L.W., and A.G. to engage in commercial sex acts.

8. Ladrigus Dondrea Stuckey, a.k.a. "Dreek," committed acts of violence against J.R. and D.A., who the defendants caused to engage in commercial sex acts.

9. Defendant Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," committed acts of violence against J.R., D.A., A.W., L.W., A.G., and minor M.M., all of whom he caused to engage in commercial sex acts. Defendant Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," also committed acts of violence against K.C. who he recruited for the purpose of causing her to engage in commercial sex acts.

10. Defendant Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," required J.R., D.A., M.M., A.W., L.W. and A.G. to give him the proceeds of the commercial sex acts that the defendants caused them to commit.

All in violation of Title 18, United States Code, Sections 1594(c), 1591(b)(1) and 1591(b)(2).

COUNT TWO

1. Paragraphs 1 through 10 of the "Overview of the Conspiracy" in COUNT ONE are re-alleged and incorporated by reference herein.

2. Beginning on a date unknown, but at least by in or about December 2013, and continuing until on or about January 20, 2014, in the Northern District of Georgia and elsewhere, the defendant, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," aided and abetted by others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, M.M., a minor under the age of 18 years, knowing and in reckless disregard of the fact that M.M. had not attained the age of 18 years and would be caused to engage in a commercial sex act, and knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, as defined in Title 18, United States Code, Section 1591(e)(2), would be

used to cause M.M. to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1) and (b)(2), and Section 2.

COUNT THREE

Beginning on a date unknown, but at least by in or about December 2013, and continuing until on or about January 20, 2014, in the Northern District of Georgia and elsewhere, the defendant, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," aided and abetted by others known and unknown to the grand jury, did knowingly transport M.M., an individual who had not attained the age of 18 years, in interstate commerce with the intent that M.M. engage in prostitution, in violation of Title 18, United States Code, Section 2423(a) and Section 2.

COUNT FOUR

1. Paragraphs 1 through 10 of the "Overview of the Conspiracy" in COUNT ONE are re-alleged and incorporated by reference herein.
2. Beginning on a date unknown, but at least by in or about August 2013, and continuing until in or about April 2014, in the Northern District of Georgia and elsewhere, the defendants, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," and Ladrigus Dondrea Stuckey, a.k.a. "Dreek," aided and abetted by one another, and others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any

means, in and affecting interstate commerce, J.R., knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, as defined in Title 18, United States Code, Section 1591(e)(2), would be used to cause J.R. to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1), and Section 2.

COUNT FIVE

1. Paragraphs 1 through 10 of the "Overview of the Conspiracy" in COUNT ONE are re-alleged and incorporated by reference herein.

2. Beginning on a date unknown, but at least by in or about March 2014, and continuing until in or about April 2014, in the Northern District of Georgia and elsewhere, the defendants, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," and Ladrigus Dondrea Stuckey, a.k.a. "Dreek," aided and abetted by one another, and others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, D.A., knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, as defined in Title 18, United States Code, Section 1591(e)(2), would be used to cause D.A. to engage in a commercial sex

act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1), and Section 2.

COUNT SIX

1. Paragraphs 1 through 10 of the "Overview of the Conspiracy" in COUNT ONE are re-alleged and incorporated by reference herein.

2. Beginning on a date unknown, but at least by in or about October 2013, and continuing until in or about February 2014, in the Northern District of Georgia and elsewhere, the defendant, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," aided and abetted by others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, A.W., knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, as defined in Title 18, United States Code, Section 1591(e)(2), would be used to cause A.W. to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1), and Section 2.

COUNT SEVEN

1. Paragraphs 1 through 10 of the "Overview of the Conspiracy" in COUNT ONE are re-alleged and incorporated by reference herein.

2. In or about November 2013, in the Northern District of Georgia and elsewhere, the defendant, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," aided and abetted by others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, K.C., knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, as defined in Title 18, United States Code, Section 1591(e)(2), would be used to cause K.C. to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1), and Section 2.

COUNT EIGHT

1. Paragraphs 1 through 10 of the "Overview of the Conspiracy" in COUNT ONE are re-alleged and incorporated by reference herein.

2. Beginning on a date unknown, but at least by in or about March 2014, and continuing until in or about May 2014, in the Northern District of Georgia and elsewhere, the defendant, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," aided and abetted by others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, L.W, knowing and in reckless

disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, as defined in Title 18, United States Code, Section 1591(e)(2), would be used to cause L.W., to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1), and Section 2.

COUNT NINE

1. Paragraphs 1 through 10 of the "Overview of the Conspiracy" in COUNT ONE are re-alleged and incorporated by reference herein.

2. Beginning on a date unknown, but at least by in or about March 2014, and continuing until in or about May 2014, in the Northern District of Georgia and elsewhere, the defendant, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," aided and abetted by others known and unknown to the grand jury, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means, in and affecting interstate commerce, A.G., knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, as defined in Title 18, United States Code, Section 1591(e)(2), would be used to cause A.G. to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1), and Section 2.

COUNT TEN

Beginning on a date unknown, but at least by on or about February 19, 2014, and continuing until, at least, on or about May 17, 2014, in the Northern District of Georgia and elsewhere, the defendant, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," aided and abetted by Defendant Koren Gibbs, a.k.a. "Bianca Haynes," did knowingly obstruct, attempt to obstruct, and in any way interfere with and prevent the enforcement of Title 18, United States Code, Section 1591(a), in that Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," coached A.W. to alter her statement to law enforcement, all in violation of Title 18, United States Code, Section 1591(d), and Section 2.

COUNT ELEVEN

From on or about May 17, 2014, and continuing until a date unknown, in the Northern District of Georgia and elsewhere, the defendant, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," aided and abetted by Defendant Koren Gibbs, a.k.a. "Bianca Haynes," did knowingly obstruct, attempt to obstruct, and in any way interfere with and prevent the enforcement of Title 18, United States Code, Section 1591(a) in that the defendant, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," directed Defendant Koren Gibbs, a.k.a. "Bianca Haynes," to contact M.M. for the purpose of encouraging M.M. to

cease her cooperation with law enforcement, all in violation of Title 18, United States Code, Section 1591(d), and Section 2.

COUNT TWELVE

On or about May 17, 2014, and continuing until a date unknown, in the Northern District of Georgia, the defendant, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," did knowingly obstruct, attempt to obstruct, and in any way interfere with and prevent the enforcement of Title 18, United States Code, Section 1591(a) in that he directed L.W. to erase his Apple iCloud account and social networking accounts knowing that said accounts contained evidence of a sex trafficking offense, all in violation of Title 18, United States Code, Section 1591(d).

FORFEITURE PROVISION

As a result of committing the offenses set forth in Counts One, Two, and Four through Twelve of this Indictment, the defendants, Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," Ladrigus Dondrea Stuckey, a.k.a. "Dreek," and Koren Gibbs, a.k.a. "Bianca Haynes," shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 1594(d) and Title 28, United States Code, Section 2461, all property, real and personal, used or intended to be used to commit or facilitate the commission of the offense

and all property, real and personal, constituting or derived from proceeds obtained directly or indirectly as a result of the offense, including, but not limited to, a sum of money equal to the value of the proceeds of said offenses.

Additionally, as a result of committing the offense alleged in Count Three, the defendant Travis Sentall Robinson, a.k.a. "Triggaplay," a.k.a. "Trigga," shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 2428 and Title 28, United States Code, Section 2461, all property, real and personal, used or intended to be used commit or facilitate the commission of the offense, and all property, real and personal, obtained directly or indirectly as a result of the offense.

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) as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant(s) up to the value of the forfeitable property described above.

A TRUE  BILL

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