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★ JAN 19 2012 ★

BROOKLYN OFFICE

PKC/LM:LMN
F.#2010R02198

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

ROBERT BLAKE,
also known as "Mike Blake,"
"Banks," "BA" and
"Blade," and
AKEEM CRUZ,
also known as "Vybe" and
"Mello,"

Defendants.

S E C O N D
S U P E R S E D I N G
I N D I C T M E N T

Cr. No. 11-183 (S-2) (ERK)
(T. 18, U.S.C., §§ 371,
981(a)(1)(C), 1591(a)(1),
1591(b)(1), 1594(d)(1),
1594(d)(2), 1952(a)(3)(A),
2421, 2428(a)(1),
2428(a)(2), 2 and 3551 et
seq.; T. 21, U.S.C., §
853(p); T. 28, U.S.C., §
2461(c))

- - - - -X

THE GRAND JURY CHARGES:

COUNT ONE
(Sex Trafficking)

1. In or about and between March 2009 and August 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ROBERT BLAKE, also known as "Mike Blake," "Banks," "BA" and "Blade," together with others, did knowingly and intentionally recruit, entice, harbor, transport, provide, obtain and maintain by any means one or more persons, knowing and in reckless disregard of the fact that means of force, threats of force, fraud and coercion, as described in Title 18, United States Code, Section 1591(e)(2),

and a combination of such means, would be used to cause such person or persons to engage in a commercial sex act.

(Title 18, United States Code, Sections 1591(a)(1), 1591(b)(1), 2 and 3551 et seq.)

COUNT TWO

(Conspiracy to Violate the Mann Act)

2. In or about and between March 2009 and August 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ROBERT BLAKE, also known as "Mike Blake," "Banks" "BA" and "Blade," and AKEEM CRUZ, also known as "Vybe" and "Mello," together with others, did knowingly and intentionally conspire to transport one or more individuals, to wit: Jane Doe 1 and Jane Doe 2, individuals whose identities are known to the Grand Jury, in interstate commerce with intent that such individuals engage in prostitution, contrary to Title 18, United States Code, Section 2421.

3. In furtherance of the conspiracy, and to effect its objects, within the Eastern District of New York and elsewhere, the defendants, together with others, committed and caused to be committed, among others, the following:

OVERT ACTS

(a) In or about March 2009, the defendants ROBERT BLAKE and AKEEM CRUZ arranged for Jane Doe 1 to be transported from Maine to Brooklyn, New York.

(b) In or about March 2009, the defendant ROBERT BLAKE transported Jane Doe 1 from Brooklyn, New York to Newark, New Jersey.

(c) In or about March 2009, Jane Doe 1 engaged in an act of prostitution in or around Newark, New Jersey.

(d) In or about November 2009, the defendant ROBERT BLAKE caused Jane Doe 2 to be transported from Maine to Long Island, New York.

(e) In or about November 2009, the defendants ROBERT BLAKE and AKEEM CRUZ caused an advertisement to be posted on the internet for the sexual services of Jane Doe 2.

(f) In or about November 2009, Jane Doe 2 engaged in an act of prostitution in Long Island, New York.

(g) In or about December 2009, the defendant ROBERT BLAKE caused Jane Doe 2 to be transported from Maine to Long Island, New York.

(h) In or about December 2009, the defendants ROBERT BLAKE and AKEEM CRUZ caused an advertisement to be posted on the internet for the sexual services of Jane Doe 2.

(i) In or about December 2009, Jane Doe 2 engaged in an act of prostitution in Long Island, New York.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT THREE
(Mann Act Violation)

4. In or about and between March 2009 and August 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ROBERT BLAKE, also known as "Mike Blake," "Banks," "BA" and "Blade," and AKEEM CRUZ, also known as "Vybe" and "Mello," together with others, did knowingly and intentionally transport one or more individuals in interstate commerce, with intent that such individuals engage in prostitution.

(Title 18, United States Code, Sections 2421, 2 and 3551 et seq.)

COUNT FOUR
(Promotion of Prostitution)

5. In or about and between March 2009 and August 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ROBERT BLAKE, also known as "Mike Blake," "Banks," "BA" and "Blade," and AKEEM CRUZ, also known as "Vybe" and "Mello," together with others, did knowingly and intentionally use one or more facilities in interstate commerce, to wit: one or more telephones and the internet, with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of unlawful activity, to wit: a business enterprise involving prostitution, in violation of the laws of the State of New York,

to wit: promoting prostitution in the second degree, in violation of New York Penal Law Sections 230.30(1) and 20.00, promoting prostitution in the third degree, in violation of New York Penal Law Sections 230.25(2) and 20.00, and promoting prostitution in the fourth degree, in violation of New York Penal Law Sections 230.20 and 20.00, and thereafter perform and attempt to perform the promotion, management, establishment, carrying on and facilitation of the promotion, management, establishment and carrying on of such unlawful activity.

(Title 18, United States Code, Sections 1952(a)(3)(A), 2 and 3551 et seq.)

CRIMINAL FORFEITURE
ALLEGATION AS TO COUNT ONE

6. The United States hereby gives notice to the defendant charged in Count One that, upon his conviction of such offense, the government will seek forfeiture: (a) in accordance with Title 18, United States Code, Sections 981(a)(1)(C) and 1594(d)(2), and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting or derived from any proceeds obtained directly or indirectly as a result of such offense; and (b) in accordance with Title 18, United States Code, Section 1594(d)(1), which requires any person convicted of such offense to forfeit any property, real or personal, that was used

or intended to be used to commit or to facilitate the commission of such offense.

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

(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 the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 981(a)(1)(C), 1594(d)(1) and 1594(d)(2); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE
ALLEGATION AS TO COUNTS TWO AND THREE

8. The United States hereby gives notice to the defendants charged in Counts Two and Three that, upon their conviction of either offense, the government will seek forfeiture: (a) in accordance with Title 18, United States Code, Sections 981(a)(1)(C) and 2428(a)(2), and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property constituting or derived from any proceeds obtained directly or indirectly as a result of such offenses; and (b) in accordance with Title 18, United States Code, Section 2428(a)(1), which requires any person convicted of such offenses to forfeit any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such offenses.

9. 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 the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 981(a)(1)(C), 2428(a)(1) and 2428(a)(2); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE
ALLEGATION AS TO COUNT FOUR

10. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count Four, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property constituting or derived from proceeds traceable to such offense.

11. 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;

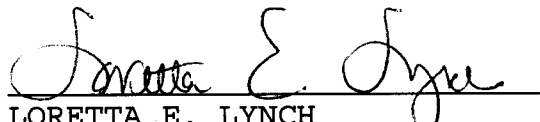
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



FIGUEROA



LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____ Action: _____

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK
CRIMINAL Division

THE UNITED STATES OF AMERICA

vs.

ROBERT BLAKE, also known as "Mike Blake,"
"Banks," "BA" and "Blade," and
AKEEM CRUZ, also known as "Vybe" and "Mello,"
Defendants.

SECOND SUPERSEDING INDICTMENT

(T. 18, U.S.C., §§ 371, 981(a)(1)(C), 1591(a)(1), 1591(b)(1), 1594(d)(1),
1594(d)(2), 1952(a)(3)(A), 2421, 2428(a)(1), 2428(a)(2), 2 and 3551 et seq.;
T. 21, U.S.C. § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.

Foreman

Filed in open court this _____ day,
of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Licha M. Nyiendo, Assistant U.S. Attorney (718-254-6350)