

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

CR No. 09-

v.

INDICTMENT

18 U.S.C. § 371

18 U.S.C. §§ 1591, 1594

**STANLEY MACK SPRIGGS, JR.
a.k.a. "BUG", SHARLISE MICHELLE
DUCKWORTH, and HOLLIE ROBIN
SPRIGGS,**

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

Conspiracy to Commit Sex Trafficking of Minors

18 U.S.C. § 371

A. OBJECT OF THE CONSPIRACY

Beginning about January 2009 and continuing through about April 2009, in the District of Oregon and elsewhere, **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH, and HOLLIE ROBIN SPRIGGS**, defendants herein, and others known and unknown to the grand jury, conspired and agreed with each other to, recruit, entice, harbor, transport, provide, obtain by any means, and attempt to recruit, entice, harbor, transport, provide and obtain by any means, minor females knowing they had not attained the age of 18 years and would be caused to engage in a commercial sex act in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), and (b)(1), and Title 18, United States Code, Section 1594(a).

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished, in substance, as follows:

1. Defendants **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH**, and **HOLLIE ROBIN SPRIGGS**, would recruit minor females to engage in commercial sex acts and work as prostitutes for defendants in a joint venture.
2. Defendants **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH**, and **HOLLIE ROBIN SPRIGGS** would give the minor females instructions regarding how much to charge customers, also known as “Johns or Tricks”, to engage in various commercial sexual acts.
3. Defendant **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH**, and **HOLLIE ROBIN SPRIGGS** would obtain hotel rooms where the minor females would reside and perform various commercial sex acts.
4. Defendants **SHARLISE MICHELLE DUCKWORTH** and **HOLLIE ROBIN SPRIGGS** would take photographs of the minor females for the purpose of preparing commercial sex advertisements on Craigslist and other online advertising services.
5. Defendants **SHARLISE MICHELLE DUCKWORTH** and **HOLLIE ROBIN SPRIGGS** would use a computer to post commercial sex advertisements for the minor females with Craigslist and other online advertising services.
6. Defendants **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH**, and **HOLLIE ROBIN SPRIGGS** would drive the minor females to various locations so they could engage in commercial sex acts with customers, also known as “Johns” or “Tricks”.

7. Defendants **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH**, and **HOLLIE ROBIN SPRIGGS** would collect the money minor females earned from performing commercial sex acts.

C. OVERT ACTS

In furtherance of the conspiracy and to accomplish the objects of the conspiracy, defendants **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH**, and **HOLLIE ROBIN SPRIGGS**, and others known and unknown to the Grand Jury, committed various overt acts within the District of Oregon and elsewhere, including but not limited to the following:

1. On or about January 9, 2009, Lavar Daye obtained and provided K.F., a minor female, to defendants **SHARLISE MICHELLE DUCKWORTH** and **HOLLIE ROBIN SPRIGGS** for the purpose of prostitution and engaging in commercial sex acts at the Super 8 Motel in Springfield, Oregon.

2. From on or about January 9, 2009, through January 12, 2009, defendants, **SHARLISE MICHELLE DUCKWORTH** and **HOLLIE ROBIN SPRIGGS** harbored K.F. in a room at the Super 8 Motel in Springfield, Oregon.

3. On or about January 9, 2009, defendants, **SHARLISE MICHELLE DUCKWORTH** and **HOLLIE ROBIN SPRIGGS** instructed K.F. regarding how much to charge for various commercial sex acts. For example, **SHARLISE MICHELLE DUCKWORTH** and **HOLLIE ROBIN SPRIGGS** directed K.F. to charge \$175 for a half hour sex act, \$250 for a full hour sex act. Oral and anal sex were an extra \$100 and \$200 respectively.

4. On or about January 10, 2009, and January 17, 2009, defendants **SHARLISE MICHELLE DUCKWORTH** and **HOLLIE ROBIN SPRIGGS** took photographs and posted a commercial sex advertisement for K.F. on the internet using the name “Sierra”.

5. On or about January 21, 2009, defendants **SHARLISE MICHELLE DUCKWORTH** and **HOLLIE ROBIN SPRIGGS** harbored K.F. in a room at the Crosslands Hotel in Springfield so she could engage in commercial sex acts.

6. On or between January 11, 2009, and January 24, 2009, defendant **SHARLISE DUCKWORTH** deposited amounts of cash that K.F. earned from engaging in commercial sex acts, on defendant **STANLEY MACK SPRIGGS, JR.’s** books while he was incarcerated at the Lane County Jail.

7. On or about February 28, 2009, defendants, **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH,** and **HOLLIE ROBIN SPRIGGS** recruited K.F. and N.W., after “The Game” concert in Eugene, Oregon, to engage in prostitution and commercial sex acts.

8. On or about February 28, 2009, defendants, **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH,** and **HOLLIE ROBIN SPRIGGS** transported and K.F. and N.W. to a residence maintained by Loren Spriggs in Springfield, Oregon for the purpose of engaging in prostitution and commercial sex acts.

9. On or about March 1, 2009, defendants, **SHARLISE MICHELLE DUCKWORTH** and **HOLLIE ROBIN SPRIGGS** took photographs of K.F. to be used in commercial sex advertisements on the internet.

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10. On or about March 1, 2009, defendants, **SHARLISE MICHELLE DUCKWORTH** and **HOLLIE ROBIN SPRIGGS** posted commercial sex advertisements for K.F. and N.W. on the internet using the names of, “Sierra” and “McKayla”.

11. On or between March 1, 2009, and March 6, 2009, defendants, **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH,** and **HOLLIE ROBIN SPRIGGS** harbored and maintained K.F. and N.W. at a residence owned by Loren Spriggs. The minors were harbored for the purpose of engaging in prostitution and commercial sex acts.

12. On or between March 1, 2009, and March 6, 2009, defendants **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH,** and **HOLLIE ROBIN SPRIGGS** instructed K.F. and N.W. regarding how much to charge for various commercial sex acts. For example, defendants directed K.F. and N.W. to charge \$150 for a half our sex act and \$200 to \$250 for a full hour of sex acts.

13. On or between March 1, 2009, and March 6, 2009, defendants **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH,** and **HOLLIE ROBIN SPRIGGS** provided K.F. and N.W. with condoms to use while engaging in prostitution and commercial sex acts.

14. On or between March 1, 2009, and March 6, 2009, defendant **STANLEY MACK SPRIGGS, JR.** transported N.W. to the Springfield Spas in Springfield, Oregon so that N.W. could engage in a commercial sex act.

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15. On or between March 1, 2009, and March 6, 2009, defendant **STANLEY MACK**

SPRIGGS, JR. received money N.W. earned from engaging in a commercial sex act at the Springfield Spas.

16. On or about March 6, 2009, defendant **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH,** and **HOLLIE ROBIN SPRIGGS** transported K.F. to a residence in Eugene, Oregon for the purpose of engaging in a commercial sex act.

17. On or about March 6, 2009, defendant **STANLEY MACK SPRIGGS, JR.,** received money that K.F. earned from engaging in a commercial sex act.

COUNT 2
Sex Trafficking of Minor
18 U.S.C. § 1591

Beginning in January 2009 and continuing through April 2009, in the District of Oregon, **STANLEY M. SPRIGGS, SHARLISE MICHELLE DUCKWORTH,** and **HOLLIE ROBIN SPRIGGS,** defendants herein, aided by others known and unknown to the grand jury, did the following acts, knowing that “K.F.” a female under the age of 18 years, would be caused to engage in a commercial sex act:

- (a) Defendants, **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH,** and **HOLLIE ROBIN SPRIGGS,** did, while in or affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain by any means, and attempt to recruit, entice, harbor, transport, provide and obtain by any means, “K.F.”; and

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- (b) Defendants, **STANLEY MACK SPRIGGS, JR., SHARLISE MICHELLE DUCKWORTH,** and **HOLLIE ROBIN SPRIGGS,** did benefit, financially or

by receiving a thing of value, from participation in a venture which engaged in the recruiting, enticing, harboring, transporting, providing, and obtaining K.F. by any means; All in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), and (b)(1), and 1594(a).

COUNT 3
Sex Trafficking of Minor
18 U.S.C. § 1591

Beginning in December 2008 and continuing through on or about April 2009, in the District of Oregon, **STANLEY MACK SPRIGGS, JR.** and **SHARLISE MICHELLE DUCKWORTH**, defendants herein, aided by others known and unknown to the grand jury, did the following acts, knowing that “N. W.” a female under the age of 18 years, would be caused to engage in a commercial sex act:

(a) Defendants, **STANLEY MACK SPRIGGS, JR.** and **SHARLISE MICHELLE DUCKWORTH**, did, while in or affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain by any means, and attempt to recruit, entice, harbor, transport, provide and obtain by any means, “N.W.”; and

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(B) Defendants, **STANLEY MACK SPRIGGS, JR.**, and **SHARLISE MICHELLE DUCKWORTH**, did benefit, financially or by receiving a thing of value, from

participation in a venture which engaged in the recruiting, enticing, harboring, transporting, providing, and obtaining of N.W. by any means; All in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), and (b)(1), and 1594(a).

DATED this 28th day of December 2009.

A TRUE BILL

OFFICIATING FOREPERSON

Presented by:

KENT S. ROBINSON
Acting United States Attorney

KEMP L. STRICKLAND, OSB #96118
Assistant United States Attorney