

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)
)
 v.)
)
 JOSHUA JACQUIS DUMAS,)
 a.k.a. "Hit Man,")
)
 Defendant.)

Criminal No.: 1:13-CR-94-LMB

STATEMENT OF FACTS

The United States of America and the defendant, Joshua Jacquis Dumas, agree that had this matter proceeded to trial, the United States would have proven beyond a reasonable doubt the following facts:

1. Between in and around January 2012 and on or about December 11, 2012, in Fairfax County, in the Eastern District of Virginia, and elsewhere, the defendant, Joshua Jacquis Dumas, also known as "Hit Man," did knowingly engage in a Child Exploitation Enterprise, to wit: by violating Section 1591 of Title 18 of the United States Code, as part of a series of felony violations constituting more than three separate incidents and involving at least three victims who had not attained the age of eighteen years, and committed these offenses in concert with more than three other persons, including Edwin Barcus, Jr., a man whose initials are "QDD," a man whose initials are "JOO," a man who is known as "Hollywood," a woman whose initials are "KTR," and others known and unknown, all in violation of Title 18, United States Code, Sections 1591(a) and 2252A(g).

2. The series of felony violations committed by this child exploitation enterprise, of which Joshua Jacquis Dumas was a member, include violations of Title 18, United States Code, Section 1591(a) (Sex Trafficking of a Child), between at least May 15, 2012 and December 11, 2012, on at least one hundred different occasions. These incidents occurred in the Eastern District of Virginia; the Northern, Middle, and Southern Districts of Georgia; the Northern District of Florida, the District of South Carolina, the District of Maryland, and the Western District of North Carolina. These incidents occurred with respect to at least the following six victims who had not yet attained the age of eighteen years at the time they were prostituted by the child exploitation enterprise: Jane Doe #1, a girl who was born in July 1995; Jane Doe #2, a girl who was born in April 1995; Jane Doe #3, a girl who was born in June 1994; Jane Doe #4, a girl who was born in October 1995; Jane Doe #5, a girl who was born in September 1995; and Jane Doe #6, a girl who was born in January 1995.

3. Defendant Joshua Jacquis Dumas (hereinafter "Dumas") is a man from Georgia who assisted Edwin Barcus, Jr., in operating an interstate prostitution business that initially operated from Atlanta, Georgia. Dumas served as a manager and supervisor of the child exploitation enterprise. Among other things, Dumas recruited women and girls who were prostituted by the enterprise, rented hotel rooms where acts of prostitution took place, supervised girls and women who were prostituted by the enterprise, posted advertisements on the Internet to obtain customers for the women and girls prostituted by the enterprise, drove women and girls interstate for purposes of prostitution, and obtained narcotics that were provided to the girls and women who were being prostituted by the enterprise. In 2012, money obtained from this child exploitation enterprise was Dumas's primary means of financial support.

4. Defendant Edwin Barcus, Jr., also known as “Boo,” (hereinafter “Barcus”) is originally from the state of Georgia and is related to Dumas. Since at least 2007, Barcus supported himself primarily through pimping girls and women, and secondarily, by selling narcotics. Barcus’s family and friends knew that he was a pimp and, indeed, Barcus sometimes bragged that he was a pimp. Barcus was the founder, leader, and organizer of the prostitution venture, and his co-conspirators deferred to him and generally followed Barcus’s instructions and orders.

5. Dumas and Barcus obtained sex customers for the girls and women they prostituted by posting advertisements on Internet sites such as “Backpage.com.” The advertisements Dumas and Barcus posted frequently featured photographs of scantily-clad women (usually not the actual girls or women whom Barcus was prostituting) in sexually-suggestive poses, and the advertisements included telephone numbers that customers could call for service. Customers called the listed telephone numbers and were directed to motels and hotels where the girls and women Dumas and Barcus prostituted performed sex acts with the customers for money.

6. Co-conspirator “QDD,” also known as “Tay,” is a man from Georgia who is a relative of Barcus and Dumas. QDD has been involved in prostitution since at least 2011. Among other things, QDD served as an “enforcer” and was charged with providing security for the child exploitation enterprise. QDD also provided advice to Barcus concerning the operation of this enterprise.

7. Co-conspirator “JOO,” also known as “Dread” and “Eight Ball,” is a man from Georgia who has been involved in prostitution since at least 2011. He is a leader of an organization known as the “Cold-Blooded Cartel” that is affiliated with the “Bloods” gang. Among other things,

JOO stole money from prostitutes who worked for other pimps and provided Barcus and others with women and girls to prostitute.

8. Co-conspirator "Hollywood," is a man who is not a U.S. citizen and has been involved in prostitution since at least 2011.

9. Co-conspirator "KTR," also know as "KK," is a woman from Georgia who was in a long-term relationship with QDD, and has been involved in prostitution since at least 2010.

10. "JJK" is a juvenile relative of Barcus who traveled with Barcus from approximately June 2012 to December 11, 2012, and stayed at hotels with Barcus, Dumas, other co-conspirators, and the women and girls prostituted by Barcus. JJK sometimes acted as a "lookout" to ensure that the police were not around, held money, and ran errands for Barcus and the child exploitation enterprise. Dumas knew that Barcus had instructed JJK that, if the police ever inquired, JJK should pose as the boyfriend of one of the underage girls Barcus was prostituting and that JJK should tell the police that he was the boyfriend of this girl.

11. During his career as a pimp, from approximately August 2005 to December 2012, Barcus and various co-conspirators prostituted at least twenty-three adult women and seven girls who had not attained the age of eighteen years, and transported these women and girls interstate for purposes of prostitution. After Dumas joined the enterprise, girls and women were transported interstate for purposes of prostitution to places such as: Ashburn, Herndon, and Sterling, Virginia; various locations in Georgia (including Augusta, Atlanta, Marietta, Macon, Savannah and various locations in Cobb, Gwinnett, and DeKalb Counties); Tallahassee, Florida; Myrtle Beach and Charleston, South Carolina; Murfreesboro, Tennessee; Baltimore, Maryland; and Charlotte, North Carolina.

12. While Dumas was a member of this child exploitation enterprise, Dumas and other members of the enterprise prostituted four girls who were sixteen years old when they initially were prostituted, while two other girls were seventeen years old when they were prostituted by the enterprise. Dumas and the other members of the enterprise listed above knew or recklessly disregarded the fact that these girls were under the age of eighteen years. In addition, Dumas and the other members of the enterprise had a reasonable opportunity to see and observe the girls, some of the girls told Dumas that they were under the age of eighteen, Dumas knew that at least one of the girls was a runaway, and Dumas had discussions with his co-conspirators regarding suspicions that some of the girls were less than eighteen years old.

13. Dumas and the other members of child exploitation enterprise prostituted Jane Doe #1 in various places, including Herndon, Virginia; various places in Georgia; and at least twice in Tallahassee, Florida. Barcus attempted to recruit Jane Doe #1 beginning around April 2012, and by May 2012, Barcus was prostituting Jane Doe #1 even though she was only sixteen years old. Barcus continued prostituting Jane Doe #1 after she turned seventeen years old. Dumas became the primary pimp for Jane Doe #1 when Jane Doe #1 was sixteen years old and Dumas continued to prostitute Jane Doe #1 after she turned seventeen years old.

14. Most of the commercial sex acts occurred in motels and hotels that were in and affected interstate commerce. Dumas, Barcus, QDD, KTR, JOO, and Hollywood reserved and rented motel and hotels rooms that were used to house members of the child exploitation enterprise and harbor the girls and women whom Barcus and his co-conspirators prostituted. These same hotel and motel rooms were used by the girls and women prostituted by Dumas and other members of the

child exploitation enterprise to perform sexual acts with the customers. Sometimes Dumas and his co-conspirators made reservations at these hotels and motels via the Internet.

15. In November and December 2012, during and in furtherance of the child exploitation enterprise, in the Eastern District of Virginia, Dumas, Barcus, QDD, KTR, and JOO, prostituted underage girls and women at the following hotels: the Homestead Studio Suites hotel in Sterling; the Aloft hotel in Ashburn; the Dulles Crown Plaza hotel in Herndon; the Holiday Inn Express hotel in Herndon; the Washington Dulles Marriott Suites hotel in Herndon; and the Hyatt House hotel in Herndon.

16. During and in furtherance of the child exploitation enterprise, QDD, KTR, and others rented vehicles used to transport Dumas, other members of the child exploitation enterprise, and women and girls whom members of the child exploitation enterprise prostituted, to the various states, cities, and hotels and motels where the women and girls performed commercial sex acts.

17. Barcus, QDD, KTR, and Hollywood drove vehicles and transported Dumas, other members of the child exploitation enterprise, and women and girls who were prostituted by the child exploitation enterprise (including interstate trips to such places as Herndon, Virginia; Tallahassee, Florida; Charleston, South Carolina; Charlotte, North Carolina; Baltimore, Maryland; and multiple trips to various locations in Georgia, including Atlanta, Savannah, Marietta, and Macon) to places where the women and girls were prostituted by Dumas and other members of the child exploitation enterprise.

18. During and in furtherance of the child exploitation enterprise, Barcus, Dumas, QDD, and KTR carried and, when they considered it necessary, brandished at least two pistols, the first of which was a revolver and the second of which was a black Glock, 9 millimeter, semi-automatic

pistol. At various times, these pistols were carried by Barcus, Dumas, QDD, and KTR to ensure that prostitution proceeds were not stolen, to ensure that customers paid, to prevent competing pimps from “stealing” girls, and to ensure that the members of the child exploitation enterprise and the girls and women prostituted by the enterprise were not harmed by customers or other pimps. Some of the women and girls whom Dumas and his co-conspirators prostituted saw these pistols and knew that Dumas and his co-conspirators were armed. Among other places, QDD carried the Glock, 9 millimeter pistol with QDD in the Commonwealth of Virginia during and in furtherance of the enterprise.

19. During and in furtherance of the child exploitation enterprise, Dumas, Barcus, QDD, KTR, JOO, and Hollywood posted advertisements on Backpage.com and other Internet sites, so that customers would pay to have sexual relations with girls and women prostituted by Dumas and other members of the child exploitation enterprise. The members of the child exploitation enterprise paid for these postings using prostitution proceeds (including proceeds derived from the prostitution of girls under the age of eighteen years) and conducted the transactions relating to posting by use of pre-paid debit cards.

20. Dumas, Barcus, QDD, KTR, JOO, and Hollywood attempted and succeeded in recruiting women and girls to serve as prostitutes for the child exploitation enterprise. They generally sought to recruit runaways, girls from broken homes, and women and girls who were already working as prostitutes for other pimps. Dumas, Barcus, and other members of the child exploitation enterprise sometimes contacted prostitutes whose advertisements appeared on Backpage.com and other Internet sites in an attempt to recruit them. Sometimes Barcus purchased clothing and shoes for girls whom he wanted to recruit as a means of luring them into the venture.

Dumas, Barcus, and other members of the enterprise had sexual relations with some of the underage girls whom they prostituted.

21. As a means of recruiting women and girls to prostitute for them, Dumas and Barcus sometimes indicated to potential recruits that Dumas or Barcus had a romantic interest in the potential recruit.

22. Sometimes, if a girl who was already being prostituted by another pimp refused to prostitute for Barcus or other members of the child exploitation enterprise, Barcus and other co-conspirators sometimes would steal money from these prostitutes. Barcus did this around May 19, 2012, in Savannah, Georgia to a prostitute whose initials are "TP." Barcus stole approximately \$1,500 from this prostitute and shared some of this money with his co-conspirators, including Dumas.

23. Some of the women and girls prostituted by Dumas and Barcus found it difficult to have sex with strange men repeatedly. Dumas, Barcus, and other members of the enterprise provided the girls and women whom they prostituted with alcoholic beverages, such as vodka and beer, and narcotics, such as marijuana, and MDMA (3, 4-Methylenedioxymethamphetamine)—which in its crystalline form is commonly known as "Molly," and in its pill form is commonly known as "Ecstasy." The alcohol and narcotics made the girls more vulnerable and susceptible to being prostituted, and Dumas knew that Barcus sometimes told the girls that these substances would "loosen up" and "calm" the women and girls and would help the girls to have sexual relations with the customers. Using proceeds of the prostitution, Dumas, Barcus, QDD, KTR, JOO, and Hollywood obtained these narcotics for their own consumption and for use by the women and girls

who were prostituted. Sometimes Barcus poured “Molly” directly into the mouths of girls whom Barcus prostituted.

24. Sometimes Dumas and other members of the child exploitation enterprise switched hotels and locations to ensure that law enforcement agents did not detect the child exploitation enterprise and arrest Dumas and his co-conspirators.

25. While customers were having sex with the women and girls who were prostituted, Dumas and his co-conspirators usually waited in a second hotel room or outside the hotel until the customers had left.

26. Dumas, Barcus, QDD, JOO, and KTR sometimes instructed the girls and women how to answer the telephone when customers called and how to deal with customers.

27. Dumas, Barcus, QDD, JOO, and KTR informed the women and girls whom they prostituted about the “rules” or “guidelines” they needed to follow. These rules included the following:

- a. always ask a potential customer if he is affiliated with law enforcement;
- b. never discuss sex with a customer over the telephone;
- c. always touch a customer’s penis before performing sexual services and pat down customers to ensure they are not wearing recording devices;
- d. always obtain the money from the customer before performing sexual acts;
- e. always hide the money before performing sexual acts with the customers;

- f. always use a condom with customers;
- g. check to make sure that a customer kept the condom on;
- h. never tell a customer the girl's real name;
- i. never tell a customer the girl's real age;
- j. charge extra for additional sex acts or "fetishes" requested by customers;
- k. do not let a customer have sex in multiple positions;
- l. do not talk to other pimps;
- m. give the money earned from prostitution to Barcus or other manager;
- n. if the police come, tell the police that they do not work for a pimp;
- o. if the police catch them, tell the police that the customer is the girl's boyfriend; and
- p. never tell the police that Barcus is their pimp.

28. The amount of money Dumas and Barcus earned through prostitution varied, but in Herndon, Virginia, each girl could obtain from customers \$500 per day and frequently more. Dumas, Barcus, and their co-conspirators generally instructed the women and girls to charge \$80 for 15 minutes of sex; \$100 for 30 minutes of sex; \$200 for 60 minutes of sex, and that customers had to pay extra for oral sex or other "fetishes." All of the money was then to be turned over to Barcus or another member of the child exploitation enterprise, including Dumas.

29. The child exploitation enterprise frequently worked in "teams," and each of the following was the leader of a team of women and girls who were prostituted: Barcus, QDD, Dumas, JOO, and Hollywood.

30. During the child exploitation enterprise, Barcus struck one of the women whom he was prostituting, which broke the woman's nose and caused her nose to bleed profusely and to suffer two black eyes. Despite the bleeding, Barcus did not take the woman to receive medical attention. In addition, Barcus battered at least two other women whom he prostituted and instructed Dumas that Dumas should beat Jane Doe #1. Dumas also struck at least one of the girls whom Barcus and Dumas had prostituted.

31. Barcus, Dumas, and other members of the child exploitation enterprise conducted financial transactions, including transmitting money through Western Union and Moneygram and by obtaining and using pre-paid debit cards. These transactions affected interstate commerce, involved the proceeds of sex trafficking and transportation of women interstate for purposes of prostitution, and were conducted by Barcus, Dumas, and their co-conspirators with the intent that the transactions promote the carrying on of the sex trafficking and to conceal the nature and source of the proceeds of sex trafficking.

32. By the middle of November 2012, Barcus was prostituting at least one seventeen-year-old girl in Herndon, Virginia. At that time, Dumas was prostituting at least Jane Doe #1 and Jane Doe #6 in the Atlanta, Georgia area. Because prostituting juveniles in Herndon was yielding substantial profits for Barcus, Barcus instructed Dumas to travel to Herndon and to bring the two seventeen-year-old girls whom Dumas was then prostituting. Using proceeds Barcus had obtained by prostituting a seventeen-year-old girl in Herndon, Barcus purchased Greyhound bus tickets online for Dumas, Jane Doe #1, and Jane Doe #6. Jane Doe #6 objected and told Dumas that she did not want to travel to Virginia. Dumas responded that Jane Doe #6 was his "bitch" and that "under the rules of the game," she had to go to Virginia.

33. These Greyhound tickets were issued in the name of Dumas's mother. On or about December 8, 2012, Dumas, Jane Doe #1, and Jane Doe #6 traveled from Atlanta, Georgia to Richmond, Virginia via a Greyhound bus. Barcus and QDD met the trio at the Greyhound Bus Station in Richmond, Virginia, and Barcus was in the car when QDD drove them from Richmond to Herndon, Virginia. Once in Herndon, as part of the enterprise, Dumas prostituted Jane Doe #1 and Jane Doe #6. Using funds obtained from the prostitution of Jane Doe #1 and Jane Doe #6 in Herndon, Virginia, Dumas repaid Barcus the money that Barcus had used to purchase the Greyhound tickets for Dumas, Jane Doe #1, and Jane Doe #6.

34. Dumas, Barcus, QDD, KTR, JOO, and Hollywood sometimes combined funds and resources to share costs, ensure the success of the child exploitation enterprise, and to maximize the profits of these co-conspirators.

35. To hinder law enforcement from discovering the scheme, when customers called, they were instructed which hotel to go to, but were not told the room number. Once a customer arrived, the customer was then instructed which floor or room number to go to. Dumas, Barcus, QDD, KTR, JOO, JJK, and Hollywood sometimes acted as a "look out" to conduct surveillance of customers, ensure that the police were not around, and to detect whether customers were undercover police officers.

36. Because losing a girl to another pimp would negatively affect their profits, Barcus, QDD, KTR, Dumas, JOO, and Hollywood helped ensure that other pimps did not "steal" or entice away the girls and women whom the members of the child exploitation enterprise prostituted.

37. QDD, KTR, Dumas, JOO, and Hollywood sometimes provided advice and encouragement to Barcus and other members of the child exploitation enterprise regarding the child

exploitation enterprise and avoiding detection by law enforcement agencies. For example, these individuals sometimes suggested places to prostitute the women and girls, ways to recruit women and girls to prostitute, prices to be charged, and procedures to be used to post advertisements and attract customers. Barcus, in turn, also provided advice and orders to Dumas, QDD, KTR, JOO, and Hollywood regarding the operation of the enterprise.

38. Barcus, QDD, KTR, Dumas, JOO, and Hollywood sometimes held and secured money earned from prostituting the various women and girls whom Barcus and other members of the child exploitation enterprise prostituted.

39. Using proceeds from the prostitution of girls less than eighteen years old, Barcus, Dumas, QDD, KTR, JOO, JJK, and Hollywood sometimes purchased: condoms, gas for the cars, cellular telephones, clothing, food, pre-paid debit cards, narcotics and alcoholic beverages (used to keep the girls compliant), lubricant, and other materials to be used in the girls and women obtaining customers and providing sexual services to paying customers. During and in furtherance of the child exploitation enterprise, Dumas and his co-conspirators also used proceeds of the prostitution of girls to rent vehicles and hotel rooms and to purchase at least one vehicle. All of these activities were in and affected interstate commerce.

40. QDD and KTR usually allowed Barcus, Dumas, JOO, and Hollywood to use a computer that belonged to QDD and KTR to post advertisements on Backpage.com to solicit prostitution customers. Later, Barcus and a seventeen-year-old girl whom Barcus was prostituting purchased a laptop computer that was used by Dumas and others to post advertisements on Backpage.com and other Internet sites to solicit prostitution customers.

41. On at least two occasions in 2012, Barcus, QDD, and others traveled to Tennessee to obtain girls whom another pimp was prostituting. On one such occasion, around November 2012, in or around Murfreesboro, Tennessee, QDD provided protection to Barcus when Barcus encountered a competitor-pimp from whom Barcus was attempting to take a juvenile prostitute so that this juvenile would work for Barcus. To intimidate and threaten this competitor-pimp, QDD carried a semi-automatic pistol in his pocket and kept his hand in that pocket when Barcus was confronting the competitor-pimp so that the competitor-pimp would understand that QDD was armed with a pistol and was prepared to use it.

42. Barcus provided some of the proceeds of the sex trafficking and prostitution of juveniles to members of his family, and various family members and relatives of Barcus and Dumas assisted Barcus and Dumas with the enterprise.

43. On or about December 11, 2012, Fairfax County (Virginia) Police discovered the enterprise working out of the Hyatt House hotel in Herndon, Virginia. Among others, Dumas and "DML," a woman who was prostituting for JOO and Barcus, was arrested by the Fairfax County Police. Barcus fled the hotel by jumping from a second-story window when he heard the police attempting to enter the hotel room. Later, using proceeds of prostitution, Barcus instructed KTR to post bail for DML and KTR did so.

44. Barcus sometimes had the women and girls whom he prostituted tattooed with Barcus's nickname, "Boo," and at least one girl whom Dumas prostituted was tattooed with the name "Josh."

45. On December 11, 2012, when Dumas was arrested by the Fairfax County Police, Dumas had in his possession \$520 in U.S. currency (which was partial proceeds of prostituting

juvenile girls); eight Trojan condoms (which were to be used by sex customers); and two cellular telephones (which were used during and in furtherance of the enterprise).

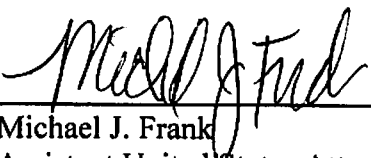
46. The acts taken by the defendant in furtherance of the offense charged in this case, including the acts described above, were done willfully and knowingly with the specific intent to violate the law and were not committed by mistake, accident, or other innocent reason. The defendant further acknowledges that the defendant is obligated under his plea agreement to provide additional information about this case beyond that which is described in this Statement of Facts.

47. This Statement of Facts shall be admissible as a knowing and voluntary confession in any proceeding against the defendant regardless of whether the plea agreement is presented to or accepted by a Court. Moreover, the defendant waives any rights that the defendant may have under Fed. R. Crim. P. 11(f), Fed. R. Evid. 410, the United States Constitution, and any federal statute or rule in objecting to the admissibility of the Statement of Facts in any such proceeding.

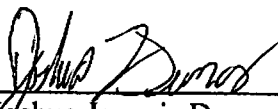
48. This Statement of Facts includes those facts necessary to support the plea agreement between the defendant and the government. It does not include each and every fact known to the defendant or the government, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

Respectfully submitted,

Neil H. MacBride
United States Attorney

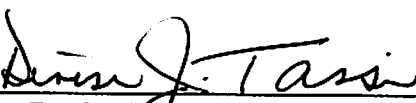
By: 
Michael J. Frank
Assistant United States Attorney
Marc J. Birnbaum
Special Assistant United States Attorney (LT)

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proven the same beyond a reasonable doubt.



Joshua Jacquis Dumas
Defendant

I am the defendant's attorney. I have carefully reviewed the above Statement of Facts with the defendant. To my knowledge, the defendant's decision to stipulate to these facts is an informed and voluntary one.



Ms. Denise J. Tassi, Esquire
Counsel for the Defendant