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UNITED STATES OF AMERICA

FILED
MAR 2 1 2019
Clerk, U S District Court
District Of Montana
Billings

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

UNITED STATES OF AMERICA, **Plaintiff,** **vs.** **SCOT DONALD PETRIE,** **Defendant.**	**CR 19-33 -BLG- DLC** **INDICTMENT** **CONSPIRACY** **Title 18 U.S.C. § 371** **(Count I)** **(Penalty: Five years imprisonment, $250,000 fine, three years supervised release)** **COERCION AND ENTICEMENT** **Title 18 U.S.C. §§ 2422(a) and 2** **(Counts II, III)** **(Penalty: 20 years imprisonment, $250,000 fine, five years to lifetime supervised release, $5,000 special assessment)**

	TRANSPORTATION OF A PERSON WITH INTENT TO ENGAGE IN CRIMINAL SEXUAL ACTIVITY **Title 18 U.S.C. §§ 2421 and 2** **(Count IV)** **(Penalty: Ten years imprisonment, $250,000 fine, five years to lifetime supervised release, $5,000 special assessment)** **FORFEITURE ALLEGATION** **18 U.S.C. § 2428** **21 U.S.C. § 853(p)**

THE GRAND JURY CHARGES:

COUNT I

From in or before June 2014, and continuing until in or around January 2019, at Billings, in Yellowstone County, in the State and District of Montana, and elsewhere, the defendant, SCOT DONALD PETRIE, did knowingly, unlawfully, and willfully conspire, confederate, and agree with other persons, known and unknown to the Grand Jury, to commit the following offense against the United States: coercion and enticement of persons to travel in interstate and foreign commerce to engage in prostitution and other sexual activity for which any person can be charged with a criminal offense, namely prostitution in violation of the laws of the State of Montana (Mont. Code Ann. § 45-5-601), in violation of 18 U.S.C. § 2422(a).

MANNER AND MEANS

It was part of the conspiracy that the defendant, SCOT DONALD PETRIE, and others, developed a scheme and enticed and encouraged individuals to travel from outside the State of Montana to Montana for the purpose of commercial sexual activity.

As part of the conspiracy, the defendant, SCOT DONALD PETRIE, and others, would provide a location in Billings, Montana, for individuals to engage in commercial sexual services and provide half of any money made on such services to the members of the conspiracy.

OVERT ACTS

In furtherance of the conspiracy, and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the District of Montana and elsewhere:

1. The defendant, SCOT DONALD PETRIE, assisted with the operations of massage parlors, specifically King Spa and A Spa, both located in Billings, Montana.
2. On or about June 14, 2014, the defendant, SCOT DONALD PETRIE, caused an advertisement to be placed on Backpage.com.
3. On or about February 3, 2016, in the District of Montana and elsewhere, the defendant, SCOT DONALD PETRIE, purchased bulk condoms from

the Condom Depot for a delivery to an address associated with the defendant.

4. In or about September 2018, the defendant, SCOT DONALD PETRIE, had discussions with an individual for the purpose of encouraging her to travel to Montana for the purpose of engaging in commercial sex.
5. On or about January 12, 2019, in the District of Montana and elsewhere, the defendant, SCOT DONALD PETRIE, utilized his debit card to purchase a bus ticket for an individual to travel to Montana for the purpose of engaging in commercial sex.
6. In or about January 2019, the defendant, SCOT DONALD PETRIE, transported an individual from the Billings Logan International Airport to King Spa for the purpose of the individual engaging in commercial sex.
7. On or about January 14, 2019, the defendant, SCOT DONALD PETRIE, transported an individual from Butte, Montana, to Billings, Montana, for the purpose of that person engaging in commercial sex.
8. In or about January 2019, the defendant, SCOT DONALD PETRIE, assisted another individual in reopening King Spa for the purpose of having individuals engage in commercial sex.

All in violation of 18 U.S.C. § 371.

COUNT II

That in or around September 2018, at Billings, in Yellowstone County, in the State and District of Montana, and elsewhere, the defendant, SCOT DONALD PETRIE, did knowingly persuade, induce, entice and coerce any individual, that is Jane Doe 1, and aided and abetted the same, to travel in interstate and foreign commerce to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense, namely prostitution, in violation of the laws of the State of Montana (Mont. Code Ann. § 45-5-601), in violation of 18 U.S.C. §§ 2422(a) and 2.

COUNT III

That in or around January 2019, at Billings, in Yellowstone County, in the State and District of Montana, and elsewhere, the defendant, SCOT DONALD PETRIE, did knowingly persuade, induce, entice and coerce any individual, that is Jane Doe 2, and aided and abetted the same, to travel in interstate and foreign commerce to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense, namely prostitution, in violation of the laws of the State of Montana (Mont. Code Ann. § 45-5-601), in violation of 18 U.S.C. §§ 2422(a) and 2.

COUNT IV

That in or around January 2019, in the State and District of Montana and elsewhere, the defendant, SCOT DONALD PETRIE, knowingly transported an individual in interstate commerce, namely Jane Doe 1, from the State of Nevada to the State of Montana, and aided and abetted in the transportation of the same, with the intent that said individual engage in any sexual activity for which any person can be charged with a criminal offense, namely prostitution, in violation of the laws of the State of Montana (Mont. Code Ann. § 45-5-601), in violation of 18 U.S.C. §§ 2421 and 2.

FORFEITURE ALLEGATION

As a result of the commission of the crimes alleged in counts II-IV, hereby realleged and incorporated by reference, and upon his conviction of any of those offenses, the defendant, SCOT DONALD PETRIE, pursuant to 18 U.S.C. § 2428, shall forfeit to the United States, all right, title and interest in any real or personal property that was used or intended to be used to commit or facilitate the commission of the offenses and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, including, but not limited to:

- A personal money judgment;

- 224 Grand Avenue, Billings, Montana 59101; Lots 33 and 34, Block 21, of West Side Subdivision, in the City of Billings, Yellowstone County, Montana; and

- 1117 Central Avenue, Billings, Montana 59101; Lot 4, Block 1, of Sanderson Subdivision, in the City of Billings, Yellowstone County, Montana.

If any of the property described above as being subject to forfeiture, as a result of any action 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; and,

e. Has been commingled with other property that cannot be divided without difficulty.

the defendant shall forfeit to the United States any other substitute property, up to the value of the property described above, pursuant to 21 U.S.C. § 853(p).

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.

FOREPERSON

KURT. G. ALME
United States Attorney

for JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney

Crim. Summons ✓ 4/25/2019 @ 9 a.m. Blgs - TJC

Warrant: _____

Bail: _____