

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO</p> <p>1437 Bannock Street Denver, Colorado 80202</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO,</p> <p>v.</p> <p>BRIAN KEITH WILLIAMS, LYN DESHAWNE, MARY ELIZABETH POPE, SOLOMON RAY HERRERA,</p> <p>Defendants.</p>	<p><b>▲ COURT USE ONLY ▲</b></p>
<p>CYNTHIA H. COFFMAN, Attorney General JANET S. DRAKE, Counsel of Record Senior Assistant Attorney General 1300 Broadway, 9<sup>th</sup> Floor Denver, Colorado 80203 720.508.6716 Registration Number: 27697</p>	<p>State Grand Jury Case: 14 CR 0001</p> <p>Courtroom 209</p>
<p><b>COLORADO STATE GRAND JURY INDICTMENT</b></p>	

CHARGES

COUNT 1	TRAFFICKING FOR SEXUAL SERVITUDE-MINOR, C.R.S. 18-3-504(2) (F2), <b>03085</b>
COUNT 2	PIMPING OF A CHILD, C.R.S. 18-7-405 (F3), <b>20051</b>
COUNT 3	INDUCEMENT OF CHILD PROSTITUTION, C.R.S. 18-7-405.5 (F3), <b>20061</b>
COUNT 4	PANDERING OF A CHILD, C.R.S. 18-7-403(1)(B) (F3), <b>20022</b>
COUNT 5	PROCUREMENT OF A CHILD, C.R.S. 18-7-403.5 (F3), <b>20031</b>
COUNT 6	SEXUAL ASSAULT, C.R.S. 18-3-402(1)(e) (M1) <b>0411D</b>
COUNT 7	ASSAULT IN THE THIRD DEGREE, C.R.S. 18-3-204(1)(A) (M1) <b>02038</b>
COUNT 8	CONTRIBUTING TO THE DELINQUENCY OF A MINOR, C.R.S. 18-6-701 (F4), <b>18051</b>
COUNT 9	HUMAN TRAFFICKING FOR SEXUAL SERVITUDE, C.R.S. 18-3-504(1)(a) (F3), <b>03084</b>
COUNT 10	PIMPING C.R.S. 18-7-206 (F3), <b>19061</b>
COUNT 11	PIMPING C.R.S. 18-7-206 (F3), <b>19061</b>
COUNT 12	PIMPING C.R.S. 18-7-206 (F3), <b>19061</b>

COUNT 13	PIMPING C.R.S. 18-7-206 (F3), <b>19061</b>
COUNT 14	PIMPING C.R.S. 18-7-206 (F3), <b>19061</b>
COUNT 15	MENACING, C.R.S. 18-3-206(1)(A)/(B) (F5), <b>02053</b>
COUNT 16	ATTEMPTED MURDER IN THE SECOND DEGREE, C.R.S. § 18-2-101; § 18-3-103(1) (F3), <b>ATT 01023</b>
COUNT 17	ASSAULT IN THE FIRST DEGREE, C.R.S. §18-3-202(1)(A) (F3), <b>02011</b>
COUNT 18	POSSESSION OF A CONTROLLED SUBSTANCE, C.R.S. 18-18-403.5(1),(2)(A) (DF4) <b>8101B</b>
COUNT 19	SOLICITING FOR CHILD PROSTITUTION, C.R.S. 18-7-402(1)(A) (F3), <b>20011</b>
COUNT 20	PATRONIZING A PROSTITUTED CHILD, C.R.S. 18-7-406(1)(A) (F3), <b>20071</b>
COUNT 21	SEXUAL ASSAULT, C.R.S. 18-3-402(1)(E) (M1), <b>0411D</b>
COUNT 22	CONTRIBUTING TO THE DELINQUENCY OF A MINOR, C.R.S. 18-6-701 (F4), <b>18051</b>

**INDEX OF COUNTS**

<b>Defendant</b>	<b>Charges</b>
Brian Williams	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17
Lyn Deshawne	3, 8
Mary Pope	18
Solomon Herrera	19, 20, 21, 22

STATE OF COLORADO )  
 ) ss.  
CITY AND COUNTY OF DENVER )

The 2014-2015 Colorado State Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following Indictment:

**COUNT NUMBER ONE**

TRAFFICKING FOR SEXUAL SERVITUDE – MINOR  
§ 18-3-504(2)(a), C.R.S. (F2)

Between and including September 6, 2014 and September 24, 2014, in the State of Colorado, **Brian Williams** unlawfully, knowingly and feloniously sold, recruited, harbored, transported, transferred, isolated, enticed, provided, received, obtained by any means, maintained, or made available a minor, namely **M.M.H.**, for the purpose of commercial sexual activity; in violation of section 18-3-504(2), C.R.S.

The facts supporting Count Number One are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER TWO**

PIMPING OF A CHILD  
§ 18-7-405 C.R.S. (F3)

Between and including September 6, 2014 and September 24, 2014, in the State of Colorado, **Brian Williams** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured, or realized by a child, **M.M.H.**, through prostitution; in violation of section 18-7-405, C.R.S.

The facts supporting Count Number Two are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER THREE**

INDUCEMENT OF CHILD PROSTITUTION  
C.R.S. 18-7-405.5 (F3)

On approximately September 6, 2014, in the State of Colorado, **Brian Williams and Lyn Deshawne** unlawfully and feloniously, by word or action, induced **M.M.H.**, a child, to engage in an act which was prostitution by a child; in violation of section 18-7-405.5, C.R.S.

The facts supporting Count Number Three are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER FOUR**

PANDERING OF A CHILD  
C.R.S. 18-7-403(1)(b) (F3)

Between and including September 6, 2014 and September 24, 2014, in the State of Colorado, **Brian Williams** for money or other thing of value, unlawfully and feloniously arranged or offered to arrange a situation in which **M.M.H.**, a child, could practice prostitution; in violation of section 18-7-403(1)(b), C.R.S.

The facts supporting Count Number Four are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER FIVE**

PROCUREMENT OF A CHILD  
C.R.S. 18-7-403.5 (F3)

Between and including September 6, 2014 and September 24, 2014, in the State of Colorado, **Brian Williams** unlawfully, feloniously, and intentionally gave, transported, provided, made available, or offered to give, transport, provide, or make available **M.M.H.**, a child, to another person for the purpose of prostitution of the child; in violation of section 18-7-403.5, C.R.S.

The facts supporting Count Number Five are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER SIX**

SEXUAL ASSAULT  
C.R.S. 18-3-402(1)(e) (M1)

Between and including September 6, 2014 and September 24, 2014, in the State of Colorado, **Brian Williams** unlawfully and knowing inflicted sexual intrusion or sexual penetration on **M.M.H.**, a person not the defendant's spouse, and at the time of the commission of the act the victim was at least fifteen years of age but less than seventeen years of age, and the defendant was at least ten years older than the victim; in violation of section 18-3-402(1)(e), C.R.S.

The facts supporting Count Number Six are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER SEVEN**

ASSAULT IN THE THIRD DEGREE  
C.R.S. 18-3-204(1)(a) (M1)

On approximately September 12, 2014, in the State of Colorado, **Brian Williams**, with intent to cause bodily injury to another, unlawfully and feloniously caused serious bodily injury to **M.M.H.**; in violation of section 18-3-203(1)(g), C.R.S.

The facts supporting Count Number Seven are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER EIGHT**

CONTRIBUTING TO THE DELINQUENCY OF A MINOR  
C.R.S. 18-6-701 (F4)

Between and including September 6, 2014 and September 24, 2014, in the State of Colorado, **Brian Williams and Lyn Deshawne** unlawfully and feloniously induced, aided, or encouraged **M.M.H.**, a child, to violate any state law namely: Prostitution in violation of section 18-7-201 C.R.S. and/or Unlawful Use of a Controlled Substance in violation of section 18-18-404 C.R.S.; in violation of section 18-6-701, C.R.S.

The facts supporting Count Number Eight are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER NINE**

HUMAN TRAFFICKING FOR SEXUAL SERVITUDE  
C.R.S. 18-3-504 (F3)

Between and including July 15, 2014 and September 7, 2014, in the State of Colorado, **Brian Williams** unlawfully, knowingly and feloniously sold, recruited, harbored, transported, transferred, isolated, enticed, provided, received, or obtained by any means another person, namely **S.D.**, for the purpose of coercing her to engage in commercial sexual activity; in violation of section 18-3-504, C.R.S.

The facts supporting Count Number Nine are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER TEN**

PIMPING  
C.R.S. 18-7-206 (F3)

Between and including July 15, 2014 and September 7, 2014, in the State of Colorado, **Brian Williams** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured or realized by another person, namely **S.D.**, through prostitution; in violation of section 18-7-206, C.R.S.

The facts supporting Count Number Ten are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER ELEVEN**

PIMPING  
C.R.S. 18-7-206 (F3)

Between and including September 23, 2014 and January 7, 2015, in the State of Colorado, **Brian Williams** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value

earned, received, procured or realized by another person, namely **M.P.**, through prostitution; in violation of section 18-7-206, C.R.S.

The facts supporting Count Number Eleven are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

### COUNT NUMBER TWELVE

PIMPING  
C.R.S. 18-7-206 (F3)

Between and including September 10, 2014 and October 23, 2014, in the State of Colorado, **Brian Williams** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured or realized by another person, namely **T.W.**, through prostitution; in violation of section 18-7-206, C.R.S.

The facts supporting Count Number Twelve are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

### COUNT NUMBER THIRTEEN

PIMPING  
C.R.S. 18-7-206 (F3)

Between and including September 10, 2014 and October 23, 2014, in the State of Colorado, **Brian Williams** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured or realized by another person, namely **F.M.**, through prostitution; in violation of section 18-7-206, C.R.S.

The facts supporting Count Number Thirteen are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER FOURTEEN**

PIMPING  
C.R.S. 18-7-206 (F3)

Between and including February 8, 2014 and October 10, 2014, in the State of Colorado, **Brian Williams** unlawfully, feloniously, and knowingly lived on, was supported, or was maintained in whole or in part by money or other thing of value earned, received, procured or realized by another person, namely **C.E.**, through prostitution; in violation of section 18-7-206, C.R.S.

The facts supporting Count Number Fourteen are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER FIFTEEN**

MENACING – REAL OR SIMULATED WEAPON  
C.R.S. § 18-3-206(1)(A)/(B) (F5)

On approximately January 5, 2015, in the State of Colorado, **Brian Williams**, by any threat or physical action unlawfully, feloniously, and knowingly placed or attempted to place **Shawn Terrell** in fear of imminent serious bodily injury by use of a deadly weapon or any article used or fashioned in a manner to cause a person to reasonably believe that the article was a deadly weapon, namely: a box-cutter; in violation of section 18-3-206(1)(a)/(b), C.R.S.

The facts supporting Count Number Fifteen are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER SIXTEEN**

ATTEMPTED MURDER IN THE SECOND DEGREE  
C.R.S. §§ 18-3-103(1) and 18-2-101 (F3)

On approximately January 6, 2015, in the State of Colorado, **Brian Williams**, by engaging in conduct constituting a substantial step toward the commission of Murder in the Second Degree, unlawfully, feloniously, and knowingly attempted to cause the death of **Nicholas Fisher**, in violation of sections 18-3-103(1) and 18-2-101, C.R.S.

The facts supporting Count Number Sixteen are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER SEVENTEEN**

ASSAULT IN THE FIRST DEGREE  
C.R.S. 18-3-202(1)(A) (F3)

On approximately January 6, 2015, in the State of Colorado, **Brian Williams**, with intent to cause serious bodily injury to another person, unlawfully and feloniously caused serious bodily injury to **Nicholas Fisher**, by means of a deadly weapon, namely: a knife; in violation of section 18-3-202(1)(a), C.R.S.

The facts supporting Count Number Seventeen are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER EIGHTEEN**

POSSESSION OF A CONTROLLED SUBSTANCE  
C.R.S. 18-18-403.5(1),(2)(A) (DF4)

On and including January 6, 2015, and January 7, 2015, in the State of Colorado, **Mary Pope**, unlawfully, feloniously, and knowingly possessed a material, compound, mixture, or preparation that contained cocaine, a schedule II controlled substance; in violation of section 18-18-403.5(1),(2)(a), C.R.S. Further, the amount possessed was more than four (4) grams, per section 18-1.3-103.5(3)(a).

The facts supporting Count Number Eighteen are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER NINETEEN**

SOLICITING FOR CHILD PROSTITUTION  
C.R.S. 18-7-402(1)(a) (F3)

Between and including September 6, 2014 and September 24, 2014, in the State of Colorado, **Solomon Herrera** unlawfully and feloniously solicited **M.M.H.** for the purpose of prostitution of a child or by a child; in violation of section 18-7-402(1)(a), C.R.S.

The facts supporting Count Number Nineteen are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER TWENTY**

PATRONIZING A PROSTITUTED CHILD  
C.R.S. 18-7-406(1)(a) (F3)

Between and including September 6, 2014 and September 24, 2014, in the State of Colorado, **Solomon Herrera** unlawfully and feloniously engaged in an act of prostitution of a child or by a child with **M.M.H.**, a child and a person not the defendant's spouse; in violation of section 18-7-406(1)(a), C.R.S.

The facts supporting Count Number Twenty are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER TWENTY-ONE**

SEXUAL ASSAULT  
C.R.S. 18-3-402(1)(e) (M1)

Between and including September 6, 2014 and September 24, 2014, in the State of Colorado, **Solomon Herrera** unlawfully and knowing inflicted sexual intrusion or sexual penetration on **M.M.H.**, a person not the defendant's spouse, and at the time of the commission of the act the victim was at least fifteen years of age but less than seventeen years of age, and the defendant was at least ten years older than the victim; in violation of section 18-3-402(1)(e), C.R.S.

The facts supporting Count Number Twenty-One are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

**COUNT NUMBER TWENTY-TWO**

CONTRIBUTING TO THE DELINQUENCY OF A MINOR  
C.R.S. 18-6-701 (F4)

Between and including September 6, 2014 and September 24, 2014, in the State of Colorado, **Solomon Herrera** unlawfully and feloniously induced, aided, or encouraged **M.M.H.**, a child, to violate any state law namely: Prostitution in violation of section 18-7-201 C.R.S.; in violation of section 18-6-701, C.R.S.

The facts supporting Count Number Twenty-Two are set forth after Count Number Twenty-Two, and are incorporated as if fully set forth herein.

The facts supporting Counts One through Twenty-Two are as follow:

### **Statement of Relevant Facts**

From approximately February 8, 2014 to October 10, 2014, C.E. was an adult who engaged in acts of prostitution on the Front Range in Colorado. Brian Williams helped facilitate the acts of prostitution by making hotel rooms available and posting ads on Backpage.com advertising C.E. as an escort. In exchange, he received money or other things of value that C.E. earned through prostitution. Brian Williams continued pimping C.E. until approximately October 10, 2014.

On approximately July 15, 2014, Brian Williams met S.D., an adult who he convinced to engage in acts of prostitution. S.D. did not want to participate in commercial sexual activity, but Brian Williams coerced S.D. through threats and physical violence. Brian Williams posted ads on Backpage.com and arranged the acts of prostitution between S.D. and "clients" by answering calls, scheduling appointments, arranging hotels for in-calls and/or driving S.D. to out-calls. Brian Williams coerced S.D. to perform acts of prostitution in Greeley, Evans, Ft. Collins, Colorado Springs and Denver, Colorado. Brian Williams took money earned from those sex acts for his own benefit. S.D. was coerced into performing commercial sex acts and paying the proceeds to Brian Williams until approximately September 7, 2014.

During the time Brian Williams was sexually exploiting S.D., he was also pimping T.W. and F.M. T.W. and F.M. are both adults who engaged in prostitution. Brian Williams helped facilitate the acts of prostitution by making hotel rooms available and posting ads on Backpage.com advertising T.W. and F.M. as escorts. In exchange, he received money or other things of value that T.W. and F.M. earned through prostitution. Brian Williams continued pimping T.W. and F.M. until approximately October 23, 2014.

On approximately September 6, 2014, 15-year-old M.M.H. went to the Hilton in Ft. Collins, Colorado. At the Hilton, Lyn Deshawne introduced herself to M.M.H. and invited M.M.H. to her room. Lyn Deshawne introduced M.M.H. to Brian Williams and together they recruited M.M.H. to perform commercial sex acts. Lyn

Deshawne and Brian Williams told M.M.H. the “rules” of prostitution. Lyn Deshawne took photos of M.M.H. that Brian Williams used to post ads on Backpage.com. Lyn Deshawne also explained how M.M.H. should behave when servicing “clients.” Brian Williams provided M.M.H. with a phone that was used to arrange the commercial sex acts. Brian Williams also set the rates and took money that M.M.H. received for performing commercial sex with “clients.”

Between September 6, 2014 and September 24, 2014, Brian Williams posted ads on Backpage.com arranging commercial sex acts between M.M.H. and third parties. Brian Williams acquired hotel rooms that were used for “in calls,” and arranged transportation for “out calls.” Brian Williams provided M.M.H. with an illegal controlled substance referred to as “molly.” Brian Williams also supplied M.M.H. with condoms. M.M.H. engaged in prostitution in Ft. Collins, Denver and Greeley; Brian Williams received money from those acts of prostitution and used it for his own benefit.

During the same time frame in September of 2014, M.M.H. engaged in prostitution with Solomon Herrera. Solomon Herrera arranged to meet M.M.H. by responding to a Backpage.com ad. Solomon Herrera met M.M.H. at the Marriott in Ft. Collins, Colorado, and paid M.M.H. to have sexual intercourse. Solomon Herrera also invited M.M.H. to his home in Ft. Collins for another act of prostitution. During the out-call at Solomon Herrera’s home, he exchanged marijuana for sex and agreed to drive M.M.H. to Denver. At the time, M.M.H. was 15 or 16 years old, and Solomon Herrera was/is more than ten years older than M.M.H. and not her spouse.

Between September 6, 2014 and September 24, 2014, M.M.H. was 15 and 16 years old and Brian Williams had sexual intercourse with her. Brian Williams was/is more than ten years older than M.M.H. and not her spouse.

On approximately September 10, 2014, Brian Williams, M.M.H., T.W. and F.M. traveled from Ft. Collins to Colorado Springs. The purpose of the trip was, in part, to acquire illegal controlled substances.

On approximately September 12, 2014, Brian Williams was at the Hilton in Ft. Collins, Colorado, with M.M.H. They engaged in a verbal dispute, and Brian Williams hit M.M.H. in the face, which broke one of her teeth.

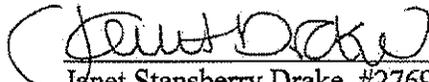
On approximately September 23, 2014, Brian Williams recruited M.P. to work for him as a prostitute. M.P., T.W. and F.M. worked as prostitutes from Ft. Collins to Colorado Springs, Colorado, up to and including October 23, 2014. During that time, M.P., T.W. and F.M. paid money earned from acts of prostitution to Brian Williams for his personal benefit and/or provided Brian Williams other things of value, such as hotel rooms, that were acquired with proceeds earned from acts of prostitution. M.P. continued to commit acts of prostitution and pay Brian Williams money and provide him other things of value that were earned from commercial sex acts up to and including January 7, 2015.

On January 5, 2015, in the parking lot of a Diamond Shamrock gas station in Ft. Collins, Brian Williams threatened Shawn Terrell with what was described as a box cutter. Shawn Terrell was in fear of imminent serious bodily injury, and suffered scratches to his face; his jacket was also cut.

On January 6, 2015, at the Hilton in Ft. Collins, Colorado, Brian Williams said that he was going to kill Nicholas Fisher. After making that statement, Brian Williams stabbed Nicholas Fisher with a knife in the lower part of his back causing excessive bleeding and serious bodily injury. On January 6 – 7, 2015, Mary Pope was with Brian Williams at the Hilton in Ft. Collins, and was interviewed by law enforcement regarding the stabbing. During her interview, Mary Pope admitted that she had cocaine, a schedule II controlled substance, in the pocket of her pants. Mary Pope was in possession of approximately 4.3 grams of cocaine.

Dated this 26<sup>th</sup> day of March 2015.

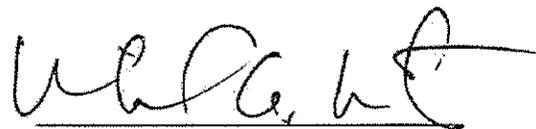
CYNTHIA H. COFFMAN  
ATTORNEY GENERAL STATE OF COLORADO

  
Janet Stansberry Drake, #27697  
Senior Assistant Attorney General  
Criminal Justice Section  
Special Prosecution Unit

The 2014-2015 Colorado Statewide Grand Jury presents this Indictment, and the same is hereby ORDERED FILED this 26<sup>th</sup> day of March 2015.

Pursuant to § 13-73-107, C.R.S., the Court designates Weld County, Colorado as the county of venue for the purposes of trial.

Dated this 26<sup>th</sup> day of March 2015.

  
Michael A. Martinez  
Chief Judge, Denver District Court  
Presiding Judge, State Grand Jury