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ORIGINAL FILED
Superior Court of California
County of Los Angeles

SEP 28 2022

Sherri R. Carter, Executive Officer/Clerk of Court
By: B. Perez, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

- 1. **KARINE MICHMICHIAN,**
- 2. **DWIGHT CUNNINGHAM,**
- 3. **DEREK HAY,**

Defendants.

Case No. GJ22-23/09

INDICTMENT BAH98396

A Grand Jury of the County of Los Angeles, State of California, hereby accuses by this Indictment, defendants KARINE MICHMICHIAN, DWIGHT CUNNINGHAM, and DEREK HAY of committing the following crimes, which are connected to each other in their commission:

COUNT ONE

[CONSPIRACY TO COMMIT PANDERING BY PROCURING]

On or about and between December 6, 2013 and December 18, 2019, in the County of Los Angeles, defendants KARINE MICHMICHIAN, DWIGHT CUNNINGHAM, and DEREK HAY committed the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1), in that they

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1 did unlawfully conspire together, and with other uncharged person or persons, to commit the
2 crimes of PANDERING BY PROCURING, in violation of Penal Code section 266i(a), a felony.

3 OVERT ACT 1

4 On or about December 6, 2013, in the County of Los Angeles, defendant KARINE
5 MICHMICHIAN completed a Wells Fargo Bank Business Account Application to open account
6 ending in 5332 for TLC Planners and Associates LLC.

7 OVERT ACT 2

8 In or about May 2015, in the County of Los Angeles, defendants KARINE
9 MICHMICHIAN and DWIGHT CUNNINGHAM met Jane Doe 1 to procure her to work as a
10 prostitute for The Luxury Companion.

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12 In or about May 2015, in the County of Los Angeles, defendant KARINE
13 MICHMICHIAN took Jan Doe 1 to a sex shop and bought her outfits and sex toys.

14 OVERT ACT 4

15 In or about May 2015, in the County of Los Angeles, defendant DWIGHT
16 CUNNINGHAM told Jane Doe 1 she would get paid extra for not using a condom.

17 OVERT ACT 5

18 In or about May 2015, in the County of Los Angeles, defendant KARINE
19 MICHMICHIAN drove Jane Doe 1 to the W Hotel in Hollywood, so that Jane Doe 1 could meet
20 with a client and perform a sex act in exchange for money.

21 OVERT ACT 6

22 On or about and between September 11, 2015 and March 2015, in the County of Los
23 Angeles, defendants KARINE MICHMICHIAN and DWIGHT CUNNINGHAM induced Jane
24 Doe 1 to agree to be represented by defendant DEREK HAY by promising her that they would be
25 able to book her with clients who would pay higher fees for prostitution services if she worked for
26 LA Direct Models.

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OVERT ACT 7

On or about November 6, 2015, in the County of Los Angeles, defendant DEREK HAY on behalf of Direct Models, Inc. doing business as LA Direct Models signed a contract with Jane Doe 5 to represent her as a talent agent.

OVERT ACT 8

On or about and between October 25, 2016 and October 27, 2016, in the County of Los Angeles, defendant DEREK HAY entered into an agreement with Jane Doe 1 to represent her for feature dancing.

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On or about February 6, 2017, defendant DEREK HAY sent a text message to defendant DWIGHT CUNNINGHAM, in the County of Los Angeles, in which defendant DEREK HAY asked defendant DWIGHT CUNNINGHAM to “cease all bookings of her,” and told defendant DWIGHT CUNNINGHAM that he told Individual 1 that she will not do any more privates unless she gets her shoots done.

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On or about March 9, 2017, in the County of Sacramento, defendant DEREK HAY on behalf of Direct Models, Inc. doing business as LA Direct Models signed a contract with Jane Doe 2 to represent her as a talent agent.

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In or about and between March 2017 and April 2017, in the County of Los Angeles, defendant DEREK HAY took Jane Doe 2 to dinner where he introduced her to defendants KARINE MICHMICHIAN and DWIGHT CUNNINGHAM.

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In or about and between March 2017 and April 2017, in the County of Los Angeles, defendants KARINE MICHMICHIAN and DWIGHT CUNNINGHAM met with Jane Doe 2 where they recruited her to work as a prostitute for The Luxury Companion.

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OVERT ACT 13

In or about April 2017, in the County of Los Angeles, defendants KARINE MICHMICHIAN and DWIGHT CUNNINGHAM recruited Jane Doe 3 to work as a prostitute, telling her what fee she would be charging and what she would be doing.

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In or about April 2017, in the County of Los Angeles, defendant DWIGHT CUNNINGHAM told Jane Doe 1 that he intended to pay the referral fee for Jane Doe 3 to defendant DEREK HAY.

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On or about May 6, 2017, in the County of Sacramento, defendant DEREK HAY on behalf of Direct Models, Inc. doing business as LA Direct Models signed a contract with Jane Doe 1 to represent her as a talent agent.

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On or about June 2, 2017, defendant DEREK HAY sent a text messages to Jane Doe 4, in the County of Los Angeles, telling her that he would introduce her to defendant KARINE MICHMICHIAN about doing privates.

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On or about June 2, 2017, defendant DEREK HAY messaged Jane Doe 4, in the County of Los Angeles, providing her with defendant KARINE MICHMICHIAN'S telephone number.

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On or about June 2, 2017, defendant DEREK HAY messaged Jane Doe 4, in the County of Los Angeles, informing her that he had arranged for defendant KARINE MICHMICHIAN to meet with her at 2:30 PM that afternoon.

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On or about June 15, 2017, in the County of Los Angeles, defendant DWIGHT CUNNINGHAM sent a text message to defendant DEREK HAY, in which defendant DWIGHT CUNNINGHAM stated, "Yes got it last night Apologies will have that up layer evening."

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On or about October 21, 2019, in the County of Los Angeles, defendant DWIGHT CUNNINGHAM sent a text message to defendant DEREK HAY, referring Individual 4 to him.

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On or about October 21, 2019, defendant DEREK HAY sent a text message to defendant DWIGHT CUNNINGHAM, in the County of Los Angeles, in which he agrees to speak with Individual 4, and asks defendant DWIGHT CUNNINGHAM for her number.

OVERT ACT 50

On or about October 21, 2019, in the County of Los Angeles, defendant DWIGHT CUNNINGHAM sent a text message to defendant DEREK HAY, in which he provided him with the contact number for Individual 4.

OVERT ACT 51

On or about December 18, 2019, in the County of Los Angeles, defendant DWIGHT CUNNINGHAM exchanged text messages with Individual 5, in which he agreed to provide her escorting jobs, and told her high end escorting jobs are safer than male talent.

COUNT TWO

[CONSPIRACY TO COMMIT PIMPING]

On or about and between December 6, 2013 and December 18, 2019, in the County of Los Angeles, defendants KARINE MICHMICHIAN, DWIGHT CUNNINGHAM, and DEREK HAY committed the crime of CONSPIRACY, in violation of Penal Code section 182(a)(1), in that they

1 did unlawfully conspire together, and with other uncharged person or persons, to commit the
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24 Doe 1 to agree to be represented by defendant DEREK HAY by promising her that they would be
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On or about October 21, 2019, in the County of Los Angeles, defendant DWIGHT CUNNINGHAM sent a text message to defendant DEREK HAY, referring Individual 4 to him.

OVERT ACT 49

On or about October 21, 2019, defendant DEREK HAY sent a text message to defendant DWIGHT CUNNINGHAM, in the County of Los Angeles, in which he agrees to speak with Individual 4, and asks defendant DWIGHT CUNNINGHAM for her number.

OVERT ACT 50

On or about October 21, 2019, in the County of Los Angeles, defendant DWIGHT CUNNINGHAM sent a text message to defendant DEREK HAY, in which he provided him with the contact number for Individual 4.

OVERT ACT 51

On or about December 18, 2019, in the County of Los Angeles, defendant DWIGHT CUNNINGHAM exchanged text messages with Individual 5, in which he agreed to provide her escorting jobs, and told her high end escorting jobs are safer than male talent.

COUNT THREE

[PANDERING BY PROCURING]

On or about and between March 15, 2017 and April 11, 2018, in the County of Los Angeles, defendants KARINE MICHMICHIAN and DWIGHT CUNNINGHAM committed the crime of PANDERING BY PROCURING, in violation of Penal Code section

1 266i(a), a felony, in that they did unlawfully procure Jane Doe 1, another person, for the
2 purpose of prostitution.

3 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to
4 Penal Code section 290 et seq. Willful failure to register is a crime.

5 **COUNT FOUR**

6 **[PIMPING]**

7 On or about and between March 15, 2017 and April 11, 2018, in the County of Los
8 Angeles, defendants KARINE MICHMICHIAN and DWIGHT CUNNINGHAM
9 committed the crime of PIMPING, in violation of Penal Code section 266h(a), a felony, in
10 that they did unlawfully, and knowing Jane Doe 1 to be a prostitute, live or derive support
11 or maintenance in whole or in part from the earnings or proceeds of Jane Doe 1, or from
12 money loaned or advanced to or charged against Jane Doe 1 by a keeper, manager, or
13 inmate of a house or other place where prostitution was practiced or allowed, or did solicit
14 or receive compensation for soliciting Jane Doe 1.

15 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to
16 Penal Code section 290 et seq. Willful failure to register is a crime.

17 **COUNT FIVE**

18 **[PANDERING BY PROCURING]**

19 On or about and between June 1, 2017 and September 30, 2017, in the County of
20 Los Angeles, defendants KARINE MICHMICHIAN and DWIGHT CUNNINGHAM
21 committed the crime of PANDERING BY PROCURING, in violation of Penal Code section
22 266i(a), a felony, in that they did unlawfully procure Jane Doe 3, another person, for the
23 purpose of prostitution.

24 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to
25 Penal Code section 290 et seq. Willful failure to register is a crime.

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COUNT SIX

[PIMPING]

On or about and between June 1, 2017 and September 30, 2017, in the County of Los Angeles, defendants KARINE MICHMICHIAN committed the crime of PIMPING, in violation of Penal Code section 266h(a), a felony, in that she did unlawfully, and knowing Jane Doe 3 to be a prostitute, live or derive support or maintenance in whole or in part from the earnings or proceeds of Jane Doe 3, or from money loaned or advanced to or charged against Jane Doe 3 by a keeper, manager, or inmate of a house or other place where prostitution was practiced or allowed, or did solicit or receive compensation for soliciting Jane Doe 3.

NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal Code section 290 et seq. Willful failure to register is a crime.

COUNT SEVEN

[PANDERING BY PROCURING]

On or about and between June 2, 2017 and March 31, 2018, in the County of Los Angeles, defendants KARINE MICHMICHIAN committed the crime of PANDERING BY PROCURING, in violation of Penal Code section 266i(a), a felony, in that she did unlawfully procure Jane Doe 4, another person, for the purpose of prostitution.

NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal Code section 290 et seq. Willful failure to register is a crime.

COUNT EIGHT

[PANDERING BY PROCURING]

On or about and between June 2, 2017 and March 31, 2018, in the County of Los Angeles, defendant DEREK HAY committed the crime of PANDERING BY PROCURING, in violation of Penal Code section 266i(a), a felony, in that he did unlawfully procure Jane Doe 4, another person, for the purpose of prostitution.

NOTICE: Conviction of this offense will require the defendant to register pursuant to Penal Code section 290 et seq. Willful failure to register is a crime.

1 **COUNT NINE**

2 **[PIMPING]**

3 On or about and between June 2, 2017 and March 31, 2018, in the County of Los
4 Angeles, defendants KARINE MICHMICHIAN committed the crime of PIMPING, in
5 violation of Penal Code section 266h(a), a felony, in that she did unlawfully, and knowing
6 Jane Doe 4 to be a prostitute, live or derive support or maintenance in whole or in part from
7 the earnings or proceeds of Jane Doe 4, or from money loaned or advanced to or charged
8 against Jane Doe 4 by a keeper, manager, or inmate of a house or other place where
9 prostitution was practiced or allowed, or did solicit or receive compensation for soliciting
10 Jane Doe 4.

11 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to
12 Penal Code section 290 et seq. Willful failure to register is a crime.

13 **COUNT TEN**

14 **[PANDERING BY PROCURING]**

15 On or about and between March 9, 2017 and April 1, 2018, in the County of Los
16 Angeles, defendant DEREK HAY committed the crime of PANDERING BY PROCURING,
17 in violation of Penal Code section 266i(a), a felony, in that he did unlawfully procure Jane
18 Doe 2, another person, for the purpose of prostitution.

19 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to
20 Penal Code section 290 et seq. Willful failure to register is a crime.

21 **COUNT ELEVEN**

22 **[PANDERING BY PROCURING]**

23 On or about and between March 9, 2017 and December 31, 2018, in the County of
24 Los Angeles, defendants KARINE MICHMICHIAN and DWIGHT CUNNINGHAM
25 committed the crime of PANDERING BY PROCURING, in violation of Penal Code section
26 266i(a), a felony, in that they did unlawfully procure Jane Doe 2., another person, for the
27 purpose of prostitution.

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1 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to
2 Penal Code section 290 et seq. Willful failure to register is a crime.

3 **COUNT TWELVE**

4 **[PIMPING]**

5 On or about and between March 9, 2017 and December 31, 2018, in the County of
6 Los Angeles, defendants KARINE MICHMICHIAN and DWIGHT CUNNINGHAM
7 committed the crime of PIMPING, in violation of Penal Code section 266h(a), a felony, in
8 that they did unlawfully, and knowing Jane Doe 2 to be a prostitute, live or derive support
9 or maintenance in whole or in part from the earnings or proceeds of Jane Doe 2, or from
10 money loaned or advanced to or charged against Jane Doe 2 by a keeper, manager, or
11 inmate of a house or other place where prostitution was practiced or allowed, or did solicit
12 or receive compensation for soliciting Jane Doe 2.

13 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to
14 Penal Code section 290 et seq. Willful failure to register is a crime.

15 **COUNT THIRTEEN**

16 **[PANDERING BY PROCURING]**

17 On or about and between March 15, 2017 and April 30, 2018, in the County of Los
18 Angeles, defendants KARINE MICHMICHIAN committed the crime of PANDERING BY
19 PROCURING, in violation of Penal Code section 266i(a), a felony, in that she did
20 unlawfully procure Jane Doe 5, another person, for the purpose of prostitution.

21 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to
22 Penal Code section 290 et seq. Willful failure to register is a crime.

23 **COUNT FOURTEEN**

24 **[PIMPING]**

25 On or about and between March 15, 2017 and April 30, 2018, in the County of Los
26 Angeles, defendant KARINE MICHMICHIAN committed the crime of PIMPING, in
27 violation of Penal Code section 266h(a), a felony, in that she did unlawfully, and knowing
28 Jane Doe 5 to be a prostitute, live or derive support or maintenance in whole or in part from

1 the earnings or proceeds of Jane Doe 5, or from money loaned or advanced to or charged
2 against Jane Doe 5 by a keeper, manager, or inmate of a house or other place where
3 prostitution was practiced or allowed, or did solicit or receive compensation for soliciting
4 Jane Doe 5.

5 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to
6 Penal Code section 290 et seq. Willful failure to register is a crime.

7 **COUNT FIFTEEN**

8 **[PANDERING BY PROCURING]**

9 On or about and between May 15, 2017 and January 31, 2019, in the County of Los
10 Angeles, defendants KARINE MICHMICHIAN and DWIGHT CUNNINGHAM
11 committed the crime of PANDERING BY PROCURING, in violation of Penal Code section
12 266i(a), a felony, in that they did unlawfully procure Jane Doe 6, another person, for the
13 purpose of prostitution.

14 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to
15 Penal Code section 290 et seq. Willful failure to register is a crime.

16 **COUNT SIXTEEN**

17 **[PIMPING]**

18 On or about and between May 15, 2017 and January 31, 2019, in the County of Los
19 Angeles, defendants KARINE MICHMICHIAN and DWIGHT CUNNINGHAM
20 committed the crime of PIMPING, in violation of Penal Code section 266h(a), a felony, in
21 that they did unlawfully, and knowing Jane Doe 6 to be a prostitute, live or derive support
22 or maintenance in whole or in part from the earnings or proceeds of Jane Doe 6, or from
23 money loaned or advanced to or charged against Jane Doe 6 by a keeper, manager, or
24 inmate of a house or other place where prostitution was practiced or allowed, or did solicit
25 or receive compensation for soliciting Jane Doe 6.

26 **NOTICE:** Conviction of this offense will require the defendant to register pursuant to
27 Penal Code section 290 et seq. Willful failure to register is a crime.

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1 **COUNT SEVENTEEN**

2 **[MONEY LAUNDERING]**

3 On or about and between August 31, 2016 and September 6, 2016, in the County of
4 Los Angeles, defendant KARINE MICHMICHIAN committed the crime of money
5 laundering, in violation of Penal Code section 186.10(a)(2), a felony, in that she
6 unlawfully conducted transactions through a financial institution, involving monetary
7 instruments of a total exceeding \$5,000, to wit: \$7,072 United States currency deposited
8 into an account at Wells Fargo Bank, N.A., knowing the currency represent the proceeds
9 of, or are derived from the proceeds of criminal activity.

10 **COUNT EIGHTEEN**

11 **[MONEY LAUNDERING]**

12 On or about and between February 8, 2017 and February 14, 2017, in the County of
13 Los Angeles, defendant KARINE MICHMICHIAN committed the crime of money
14 laundering, in violation of Penal Code section 186.10(a)(2), a felony, in that she
15 unlawfully conducted transactions through a financial institution, involving monetary
16 instruments of a total exceeding \$5,000, to wit: \$8,100 United States currency deposited
17 into an account at Wells Fargo Bank, N.A., knowing the currency represent the proceeds
18 of, or are derived from the proceeds of criminal activity.

19 **COUNT NINETEEN**

20 **[MONEY LAUNDERING]**

21 On or about and between July 3, 2017 and July 5, 2017, in the County of Los
22 Angeles, defendant KARINE MICHMICHIAN committed the crime of money
23 laundering, in violation of Penal Code section 186.10(a)(2), a felony, in that she
24 unlawfully conducted transactions through a financial institution, involving monetary
25 instruments of a total exceeding \$5,000, to wit: \$5,400 United States currency deposited
26 into an account at Wells Fargo Bank, N.A., knowing the currency represent the proceeds
27 of, or are derived from the proceeds of criminal activity.

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1 **COUNT TWENTY**

2 **[PERJURY UNDER OATH]**

3 On or about January 19, 2022, in the County of Los Angeles, defendant DEREK
4 HAY committed the crime of PERJURY, in violation of Penal Code section 118, a felony,
5 when he being a person, who having taken an oath that he would testify, declare, depose,
6 and certify truly before a competent tribunal, officer, and person, to wit, Tracy A.
7 Terkeurst, in a case in which such an oath may by law be administered, to wit,
8 administrative law hearing, did contrary to such oath state as true a material matter which
9 he knew to be false, to wit: Denied discussing the escorting business with defendants
10 MICHMICHIAN and CUNNINGHAM, denied providing images from Direct Models to
11 TLC, or defendants CUNNINGHAM and MICHMICHIAN, and denied talking with Jane
12 Doe 4 about the specific work she did with TLC.

13 **SPECIAL ALLEGATION ONE**

14 **[PRIOR SERIOUS FELONY]**

15 It is further alleged as to Counts Three, Four, Five, Eleven, Twelve, Fifteen, and
16 Sixteen, pursuant to Penal Code sections 667(a)(1) and 1170.12(b) that defendant
17 DWIGHT CUNNINGHAM, has suffered the following prior conviction(s) of a serious
18 felony, and is thus subject to sentencing pursuant to the provisions of Penal Code section
19 667(b)-(j) and Penal Code section 1170.12.

CASE NO.	CHARGE	CONV. DATE	JURISDICTION	COURT TYPE
LA08267101	PC 246	07/13/16	Los Angeles	Superior

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SPECIAL ALLEGATION FIVE

[STATUTE OF LIMITATIONS – TOLLING OF TIME PERIOD]

It is further alleged pursuant to Penal Code section 804(d), that the offenses alleged in Counts Three through Nineteen of this Indictment have been pending in the Superior Court of California, County of Los Angeles, in Case No. BA484102, since March 3, 2020, when arrest warrants were issued for the defendants on the same charges. Thus, the issuance of the arrest warrants tolled the statute of limitations pursuant to Penal Code section 803(b).

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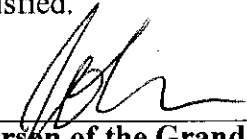
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A TRUE BILL, and with a finding that the requirements of Penal Code section 923(c) have been satisfied.



Foreperson of the Grand Jury



Juror #

Dated: 9/28/2022