

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA)

v.)

1. BRANDON LYNN GILMORE,
2. DOMINIQUE ALEXANDRA MCKEE,
3. ANGELICA MARIE CARTER,)

Case No. 13-mj-486 (TNL)

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about July 20, 2013, in Hennepin County, in the State and District of Minnesota, defendants

COUNT 1

Knowingly conspired to transport an individual who had not attained the age of 18 years in interstate commerce with intent that such individual engage in prostitution and any sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section(s) 2423 (a) and (e).

COUNT 2

Aiding and abetting each other and others, transported an individual who had not attained the age of 18 years in interstate commerce with intent that such individual engage in prostitution and any sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section(s) 2 and 2423 (a).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Complainant's signature

CHARLES BURNHAM, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date:

July 23, 2013



Judge's signature

The Honorable Tony N. Leung

Printed name and title

City and State: St. Paul, MN



13-mj-486 (full)

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR AN ARREST WARRANT

I, Charles Burnham, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

Introduction

1. I have been employed as a Special Agent of the FBI for more than four years. I am assigned to a squad that investigates crimes against children, human trafficking, fraud against the government and public corruption.

2. As a federal agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States.

3. I am investigating the activities of Brandon Lynn GILMORE (GILMORE) Angelica Marie CARTER (CARTER) and Dominique Alexandra MCKEE (MCKEE). As will be shown below, there is probable cause to believe that GILMORE, CARTER and MCKEE engaged in a violation of United States Law, particularly aiding and abetting and conspiracy to violate 18 U.S.C. 2423 (a), Interstate Transportation of a Minor to Engage in Prostitution. I submit this application and affidavit in support of an arrest warrant for Brandon Lynn GILMORE, Angelica Marie CARTER, and Dominique Alexandra MCKEE.

4. The statements in this affidavit are based primarily on information provided by the Bloomington, Minnesota Police Department, and my own investigation of this matter.

STATUTORY AUTHORITY

5. This investigation concerns alleged violations of 18 U.S.C. §§ 2 and 2423(a) and (e), relating to the sexual exploitation of children, which provides: A person who knowingly transports an individual who has not attained the age of 18 years in interstate or foreign commerce, or in any commonwealth, territory or possession of the United States, with intent that the individual engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, or conspires to do the same, shall be fined under this title and imprisoned not less than 10 years or for life.

DEFINITIONS

SUMMARY OF INVESTIGATION

6. The statements contained in this affidavit are based in part on information that I have learned through the investigation, conversations with other law enforcement officers, and my experience as a Special Agent. The information is also based upon my review of various documents and records, as well as, my personal observations and knowledge. Unless, specifically indicated, all conversations and statements described in this affidavit are related in substance and in part only. I have not included each fact known to me and connected to this investigation because this affidavit is being submitted for the limited purpose of securing an arrest warrant. I have set forth only the facts that I believe are necessary to establish probable cause to believe that an offense has occurred.

7. On July 20, 2013, at 10:15 p.m., the Bloomington P.D. (BPD) dispatch center received a call from the front desk clerk at the Ramada Hotel in Bloomington,

Minnesota, saying that they had a 14 year-old in the lobby that was having problems with the group she was with and needed to get back to Milwaukee, Wisconsin.

8. BPD officers responded and interviewed the 14 year-old minor victim. While speaking to her she told officers she had been brought to Minnesota from Milwaukee by the people in room 169, "Brandon and Dominique," and had been working as a prostitute for the last week out of the hotel. She told them that they had placed ads on Backpage.com (which you affiant knows to be an internet prostitution website) and took the proceeds the minor victim made from prostitution activity. The minor victim said that Brandon and Dominique gave the 14 year-old victim some of the money back. BPD Officers located an ad on Backpage.com showing the minor victim in sexually suggestive poses. Officers went to room 169 and were able to make contact with Brandon Lynn GILMORE (DOB10-20-89) and Dominique Alexandra MCKEE (DOB08-17-94). The officers observed a large box of condoms and prostitute type clothing in the room as well as suspected marijuana in the room.

9. Officers ran checks on all three and found that the minor victim was a runaway out of Milwaukee. Officer also discovered that GILMORE and MCKEE had been arrested in Wisconsin a week earlier on drug and weapon charges. GILMORE and MCKEE were arrested on prostitution related charges. A Bloomington P.D. officer met with the juvenile female. The minor victim told the officer that she met MCKEE on Tagged, a social media site and began chatting with her. They chatted about escorting and making some money. The minor victim's grandma gave her a ride to the Ramada Inn hotel in Milwaukee, WI on July 11, 2013, where she met with MCKEE and

GILMORE and told them she was 18. MCKEE told the minor victim the rules relating to prostitution. MCKEE also made it clear to the minor victim that MCKEE was the main girl, meaning she would deal with the other girls and the minor victim was to deal with MCKEE and not GILMORE. MCKEE explained to the minor victim that MCKEE and GILMORE would handle the room expenses and they would have a 60/40 split.

10. While in Milwaukee, MCKEE and GILMORE invited the minor victim to go to Minnesota by the Mall of America to work as an escort. MCKEE took some pictures of the minor victim in her underwear and bra with MCKEE's phone while the group was still in Milwaukee. GILMORE took some pictures of MCKEE and the minor victim in their underwear and bra together on the bed. The minor victim explained that MCKEE told her she would get paid by the client for the services she provided and would give the money she made from escorting to MCKEE, and MCKEE would give it to GILMORE. The minor victim was told that GILMORE kept 60% and 40% would go the minor victim. Later, as they traveled to Minnesota, GILMORE himself also told the minor victim the split was 60/40. MCKEE and GILMORE took more pictures of her to use in Backpage.com ads after they arrived in Minnesota.

11. The minor victim said that CARTER came to the hotel in Milwaukee and drove all of them to Minnesota in the same car. While driving to Minnesota, CARTER was stopped for a traffic violation. CARTER was stopped by the Wisconsin State Patrol on July 12, 2013 at approximately 3:53am. GILMORE was in possession of a concealed 9mm handgun, without a permit, and possession of THC, and was arrested. MCKEE was

arrested for possession of drug paraphernalia. CARTER was issued a citation for driving after suspension and released.

12. A Wisconsin State Patrol officer questioned GILMORE, MCKEE, and CARTER and the minor victim. The minor victim told the officer that she was 14 year-old. During questioning of GILMORE, MCKEE and CARTER, each was advised that the minor victim was 14. The minor victim's grandmother was contacted. The grandmother advised that the minor victim was to be released to CARTER and that the minor victim was to come back to Milwaukee.

13. Notwithstanding the grandmother's instructions, the minor victim and CARTER waited in Wisconsin until MCKEE and GILMORE were released from jail. Then all of the adults and the minor victim continued traveling to Minnesota. After they arrived they rented a hotel room at the Ramada Inn on Friday morning, July 12, 2013, in Bloomington, Minnesota. MCKEE bought the minor victim a phone at Wal-Mart that the minor victim paid for but MCKEE put in her name. They talked about prices for prostitution of \$100 for half an hour, \$200 for an hour. MCKEE or GILMORE set up an ad for her on Backpage.com with her phone number and she started receiving phone calls. She saw about 12 clients for sexual acts (5 of them multiple times) during July 12-20th. She was paid for intercourse with several of them.

14. The minor victim advised officers that she engaged in prostitution with MCKEE. The minor victim was told by MCKEE to have the clients call back when in the area to give them the room number. The minor victim said she stopped taking calls

on approximately July 19, 2013. The minor victim couldn't get home so she went to the front desk to get help and then talked to the police that arrived.

15. BPD investigators looked up the ads on Backpage.com using the phone numbers obtained for MCKEE, GILMORE, CARTER and the minor victim. The investigator found multiple ads on Backpage.com in the adult section. The ads were consistent with ads seen before advertising for prostitution services. The ads had pictures of the minor victim, MCKEE and CARTER. Copies of the ads are included in the BPD case file. The minor victim is advertised under the name "Violet." MCKEE advertised under the name "Daisy," and CARTER advertised under the name "Ivy." Investigators also found some historical ads through a Google search of the numbers for MCKEE and GILMORE.

16. The BPD. investigator returned to the minor victim and showed her the ad for her under the name "Violet," and she identified herself in the pictures. The minor victim said that MCKEE took some of the pictures in Milwaukee, and in some in Bloomington. GILMORE also took of some pictures of her and MCKEE, that were used in ads.

17. On July 20, 2013, officers responded to the hotel and conferred with the hotel clerk to identify CARTER, who was staying in room 262. Officers went to the room and knocked on the door. Officers verified the person was Angelica CARTER and she rented the room. Officers asked for permission to search the room, and CARTER agreed. While searching CARTER'S room, officers found a baggie of marijuana and some cocaine in a drawer, as well as a BB gun, that looks like a Beretta 9mm pistol.

Officers also observed massage lotion, baby oil and sexual lubricants in plain view. CARTER'S vehicle was located in the lot, and the vehicle registered to CARTER. CARTER was placed under arrest for possession of controlled narcotics, and for solicitation of prostitution.

18. During a recorded post-Miranda warning interview on July 21, 2013 with BPD, CARTER admitted that she drove to Minnesota and brought GILMORE, MCKEE and the minor victim with her. Between July 12, 2013 and July 14, 2013, CARTER engaged in prostitution with MCKEE and the minor victim with one male customer at the same time. MCKEE and CARTER both had intercourse with the male customer while the minor victim engaged in touching with the male customer, and the male customer engaged in touching the minor victim. CARTER also told investigators that CARTER was informed during the traffic stop in Wisconsin that the minor victim was in fact 14 years old. CARTER also stated during the recorded interview that GILMORE paid for some of CARTER's ads on Backpage.com using GILMORE's debit card. CARTER used her laptop to post the ads. CARTER reviewed an advertisement with the Bloomington investigator and confirmed the advertisement and pictures were of her, and that she posted the ads, and they were then reposted several times by her or GILMORE.

19. During a recorded post-Miranda warning interview on July 21, 2013 with MCKEE admitted that she met the minor victim at a party and then chatted online about escorting. The minor victim stated she was eighteen. MCKEE took pictures of the minor victim in Milwaukee. CARTER came to the hotel and drove them all to Bloomington. MCKEE admitted to being stopped by the Wisconsin State Patrol and that she and

GILMORE were arrested. They went the rest of the way to Minnesota. GILMORE checked into the hotel, but when GILMORE left to go back to Milwaukee, MCKEE put the room in her name. MCKEE posted the ads of her and the minor victim to Backpage.com. The minor victim had one or two clients that MCKEE knew about. MCKEE paid for the room and the ads. MCKEE did not want to do anything with the minor victim because MCKEE knew she was young. MCKEE however wanted the minor victim to be safe, so MCKEE let the minor victim work out of MCKEE's room because of her age.

20. MCKEE originally denied engaging in prostitution with the minor victim, but then changed her answer and admitted to a two girl encounter with CARTER, and a three girl encounter with CARTER and the minor victim. When MCKEE works with CARTER they split the money 50/50. MCKEE has made approximately \$1,400 in profit since being in Minnesota. The minor victim has made approximately \$600. MCKEE reviewed an advertisement placed on Backpage.com, and confirmed the picture was of the minor victim. MCKEE confirmed the pictures were taken by her in Milwaukee and in Bloomington, and the phone number in the advertisement was the phone number of a phone MCKEE purchased for the minor victim. MCKEE also viewed pictures of herself in ads placed on Backpage.com and agreed the pictures were of her, and that the minor victim took the pictures.

21. During a recorded post-Miranda warning interview on July 21, 2013 with GILMORE was interviewed. GILMORE advised that he came to Minnesota with CARTER, MCKEE and the minor victim. During their trip to Minnesota they were

stopped by the Wisconsin State Patrol, and that is when GILMORE found out the minor victim was 14 years old. GILMORE was arrested by the Wisconsin State Police. Prior to that time, GILMORE thought the minor victim was 18 years old. After being released from jail, GILMORE spoke with the minor victim's grandmother who advised that it was okay for the minor victim to be with GILMORE.

22. GILMORE stated that MCKEE met the minor victim just before they left Milwaukee for Minnesota. The minor victim did not do any work in Milwaukee, but GILMORE identified a picture he took of the minor victim and MCKEE while they were still in Milwaukee. GILMORE did not know how many clients the minor victim had because he was gone part of the time in Milwaukee, and MCKEE handled everything while he was gone. When GILMORE was there, he and MCKEE shared a room at the Ramada in Bloomington. The minor victim had her own room, and CARTER had her own room. Later on, they downsized and the minor victim shared a room with GILMORE and MCKEE. GILMORE stated the minor victim worked at a 60/40 split. GILMORE does not have a standing account with Backpage.com; instead he enters his debit card each time he places an advertisement. MCKEE renewed the ads using MCKEE's phone. GILMORE's phone is an Iphone, which is a part of GILMORE's mother's account. GILMORE estimated that MCKEE and the minor victim made between two thousand to three thousand dollars during their time in Minnesota, and had around \$1,000 in expenses. GILMORE acknowledged that he and MCKEE were going to get into trouble, and asked about the consequences of providing the statement.

CONCLUSION

23. Based on the aforementioned factual information, I respectfully submit that there is probable cause to believe that Brandon Lynn GILMORE, Dominique Alexandra MCKEE, and Angelica Marie CARTER, conspired to commit and committed the offense of Interstate Transportation of a Minor to Engage in Prostitution, in violation of 18 U.S.C. §§ 2, 2423 (a) and 2423 (e).

24. I, therefore, respectfully request that the attached warrant be issued authorizing the arrest of Brandon Lynn GILMORE, Dominique Alexandra MCKEE, and Angelica Marie CARTER.



Special Agent Charles Burnham
Federal Bureau of Investigation

Sworn and subscribed before me this 23rd day of July, 2013.



Honorable Tony N. Leung
United States Magistrate Judge