AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

FEB - 4 2015
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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

ALLEN C. IROEGBULEM

CASE NUMBER: UNDER SEAL

15 CR 52

MAGISTRATE JUDGE COLE

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Beginning no later than in or about December 2013, and continuing until at least in or about February 2014, at Schaumburg, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant(s) violated:

Code Section	*Offense Description*
Title 18, United States Code, Section 1591(a)	Sex trafficking of a minor by force, fraud, or coercion

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

FRANK JACK SODETZ III
Special Agent, Federal Bureau of Investigation (FBI)

Sworn to before me and signed in my presence.

Date: February 4, 2015

Judge's signature

City and state: Chicago, Illinois

Jeffrey Cole, U.S. Magistrate Judge
Printed name and Title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS | ss

AFFIDAVIT

I, FRANK JACK SODETZ III, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, and have been so employed for fourteen years. My current responsibilities include the investigation of violent crimes, including, among others, kidnapping, bank robbery, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that Allen C. Iroegbulem has violated Title 18, United States Code, Section 1591(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging IROEGBULEM with sex trafficking of minors by force, fraud, and coercion, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, information provided to me by witnesses and my and other agents' review of documents and records.

FACTS SUPPORTING PROBABLE CAUSE TO SEARCH

Background

4. As explained below, an investigation by the FBI and local law enforcement officers has revealed that ALLEN C. IROEGBULEM engaged in the sex trafficking of Minor A by force, fraud and coercion. More specifically, Minor A, who was the under age of 18, reported to law enforcement that she committed commercial sex acts on behalf of IROEGBULEM and that IROEGBULEM drugged and physically abused her while she was being trafficked by him.

Schaumburg Hotel Encounter

5. According to Schaumburg Police Department officers, on or about January 20, 2014, Schaumburg police officers were called to a hotel room located in Schaumburg, Illinois, after an employee with the Schaumburg hotel reported to the police that she had discovered a female ("Minor B") passed out in a hotel room that was being rented by IROEGBULEM. Upon arriving at the Schaumburg hotel room, police officers found Minor B and confirmed that she was unconscious. Minor B refused to go to the hospital and was picked up by her guardian. Minor B was 15 years old at the time of the incident.

6. Agents obtained reservation and payment records from the Schaumburg hotel. A review of those statements confirmed that IROEGBULEM rented a hotel room from January 19, 2014, to January 20, 2014. According to those records, when renting the room, IROEGBULEM provided his name, address, and credit card information. IROEGBULEM paid in cash for the room, with the

exception of a $50 deposit that he put on his credit card. In addition, the Schaumburg hotel provided agents with surveillance video footage. Agents familiar with both IROEGBULEM and Minor A reviewed the footage and confirmed that IROEGBULEM and Minor A were in the front lobby of the Schaumburg hotel on January 20, 2014.

7. According to the Schaumburg police department, while at the Schaumburg hotel room, police officers encountered Minor A and an individual who identified himself as IROEGBULEM[1] returning to the same hotel room. Minor A was 16 years old at the time of the incident.

8. At the Schaumburg hotel, officers interviewed Minor A, who claimed to have parental permission to be with IROEGBULEM and Minor B. Officers then took Minor A to the Schaumburg Police Department. Once there, officers contacted Minor A's mother, who informed officers that she did not give Minor A permission to be with either IROEGBULEM or Minor B. Minor A's mother instructed officers to keep Minor A in custody until she could pick her up. According to Schaumburg police officers, while Minor A was waiting at the police station, IROEGBULEM arrived and told officers that he had the permission of Minor A's parents to take Minor A home. IROEGBULEM then told officers that he had Minor A's mother on the phone and handed his phone to the officer. According to that officer, a female identified herself as Minor A's mother and informed the officer that Minor A should be released to the custody of IROEGBULEM. The officer, however, had already

[1] Officers checked IROEGBULEM's identification card and confirmed that his name was in fact ALLEN C. IROEGBULEM.

spoken to Minor A's mother and therefore knew that the female speaking was not the voice of Minor A's mother. According to Schaumburg officers, IROEGBULEM was taken into custody for contributing to the delinquency of a juvenile. IROEGBULEM's phone was seized pursuant to his arrest and subsequently searched, as described below.

9. According to the same officers, IREOGBULEM was released the same day. However, IROEGBULEM has been in state custody since approximately February 14, 2014 on criminal sexual assault charges, as described in more detail below. IROEGBULEM is scheduled to be released from state custody on February 27, 2015.

Minor A

10. On February 6, 2014, Minor A was interviewed by FBI agents. Since that time, Minor A has been interviewed by law enforcement several times.[2] During those interviews, Minor A provided the following information:

> (a) Minor A first met IROEGBULEM in December 2013, through a mutual friend. Beginning then, Minor A had a sexual relationship with IROEGBULEM. During the course of their relationship, Minor A informed IROEGBULEM that she was under the age of 18. In addition, and as set forth in more detail below, IROEGBULEM knew Minor A was in high school because he had picked her up from school in the past.
>
> (b) Around the end of December 2013, IROEGBULEM took Minor A to a party in Rockford, Illinois. Prior to going to the party, IROEGBULEM told Minor A that Minor A could make money performing lap dances for men. According to Minor A, when they got to

[2] Since her initial interview, Minor A admitted to engaging in additional commercial sex acts at the direction of IROEGBULEM. The following sets forth a compilation of the information provided by Minor A during the course of those several interviews.

the party, Minor A and three other females posed seductively for pictures in front of a painted wall. Minor A posted the picture on her social media website.[3] Prior to and during the party, IROEGBULEM provided Minor A with a sedative, cocaine, alcohol and marijuana.

(c) Once at the party in Rockford, IROEGBULEM told Minor A that he had a guy who wanted to pay to have sex with Minor A. Minor A agreed because she was afraid that IROEGBULEM would leave her in Rockford without a way home if she declined. IROEGBULEM provided Minor A with a condom to use during the sex act.[4] Minor A was taken to a room in the basement of a building where she engaged in sexual intercourse with the customer. According to Minor A, she was never actually paid and it was her understanding based on talking to IROEGBULEM that the money went to IROEGBULEM. According to Minor A, IROEGBULEM instructed Minor A to engage in sexual intercourse with approximately three additional men that night in the basement. Minor A did not receive the money from any of the commercial sex acts. IROEGBULEM arranged each of the commercial sex acts. Minor A also informed law enforcement that after she performed the commercial sex acts at the night club, IROEGBULEM took her to a residence nearby where he said she would be doing more of the same. IROEGBULEM left Minor A at the residence where she was physically abused and raped by a male. Two other men also engaged in sexual intercourse with Minor A that night. At some point, IROEGBULEM informed Minor A that she had been paid $200 for the first commercial sex act. Minor A was never provided with that money.

(d) Minor A stated that she and Minor B were taken to the hotel in Schaumburg, Illinois, by IROEGBULEM in the evening of January 19, 2014. Minor A stated that while at the Schaumburg hotel, IROEGBULEM provided both Minor A and Minor B with a sedative, marijuana, alcohol and cocaine. Then both Minor A and Minor B had sexual intercourse with IROEGBULEM while they were at the Schaumburg hotel.

(e) On January 21, 2014, the day after Minor A and IROEGBULEM were found in the Schaumburg hotel room, IROEGBULEM picked up Minor A from her high school, which was

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[3] As described below, law enforcement officers obtained and printed a copy of this picture from Minor A's social media website.

[4] Based on my training and experience, I know that there are no condom manufacturers located within the state of Illinois.

located in Carol Stream, Illinois. Beginning then, Minor A was with IROEGBULEM on and off until February 6, 2014, when she was found by law enforcement. During that time, according to Minor A, she and IROEGBLUM stayed in a number of different hotels in the Chicagoland area.[5] During that time, Minor A performed commercial sex acts for money at IROEGBULEM's direction, including one time in which IROEGBULEM dropped Minor A off at a house on the west-side of Chicago, where several men had sexual intercourse with her in the basement. IROEGBULEM informed Minor A that she was paid $700 for those commercial sex acts. IROEGBULEM never provided Minor A with any of the money. IROEGBULEM kept all of the money that Minor A earned from performing the commercial sex acts.

(f) According to Minor A, she performed the commercial sex acts because, among other reasons, she was afraid that IROEGBULEM would physically harm her if she refused. Specifically, Minor A stated that IROEGBULEM had slapped her at least twice in the past for not listening to his directions. Minor A also stated that IROEGBULEM held her against her will in his residence located in Roselle, Illinois. According to Minor A, IROEGBULEM kept Minor A in his apartment for an entire weekend, forcing her to sit on the floor in the corner with a blanket over her head. When Minor A told IROEGBULEM that she needed to use the restroom, IROEGBULEM refused to allow her to use the restroom and instead provided her with a bucket. During that weekend, when Minor A made any noise, IROEGBULEM grabbed her by the hair and told her to shut up.

(g) During that time period, IROEGBULEM informed Minor A that he had previously become angry with another minor, Minor E. IROEGBULEM told Minor A that as a result, he put Minor E in a position to perform oral sex on him and then urinated on her.[6]

(h) During the time period that Minor A performed commercial sex acts at the direction of IROEGBULEM, Minor A had to beg IROEGBULEM for food. IROEGBULEM often gave Minor A a

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[5] Law enforcement officers contacted a hotel in Arlington Heights where Minor A said she and IROEGBULEM stayed. Minor A informed officers that she had left behind personal items at the hotel. The hotel in Arlington Heights confirmed that their records show hotel rooms rented by IROEGBULEM. In addition, law enforcement officers recovered some items, including clothing, jewelry, and toiletries that Minor A identified as hers.

[6] Agents obtained police reports from the Woodstock Police Department, confirming that Minor E had reported IROEGBULEM for urinating on her. IROEGBULEM is currently in state custody serving time for that sexual assault.

sedative to dull the pain from the sexual intercourse. IROEGBULEM also gave Minor A cocaine to make sure she would stay awake. In addition, IROEGBULEM gave Minor A marijuana and alcohol to calm her nerves. IROEGBULEM urged Minor A to take the drugs and alcohol, telling her that it would help her cope with what she was doing.

(i) Minor A also provided agents with information about IROEGBULEM's phones and computers. Specifically, Minor A stated that IROEGBULEM used two phones to take photographs of herself, Minor B, and at least one other minor (identified as Minor C), during which Minor A, Minor B and Minor C are performing sex acts. Minor A also stated that IROEGBULEM had an iPad that he also used to take photographs. Defendant's two phones were recovered and searched pursuant to search warrants. During the search, agents recovered pictures of at least Minor A in lingerie. In addition, agents recovered pictures taken at the Rockford, Illinois, nightclub. Agents did not recover any images of the minors actually engaged in sex acts, but note that the videos and other images could have been deleted by IROEGBULEM, in which case the agents would not be able to recover those images. In addition, there were photographs recovered from the phones that appeared to have been taken with an iPad. Specifically, the photographs depict IROEGBULEM taking a picture of himself using what appears to be an iPad. In another phone, law enforcement officers recovered a photograph of Minor C topless and passed out. There also were pictures of Minor C clothed, lying on a bed, passed out.

Relative A

10. Minor A's account was corroborated in part by Minor A's mother, Relative A. FBI agents interviewed Relative A. During that interview, Relative A confirmed that she picked Minor A up from the Schaumburg Police Department on January 20, 2014, after Minor A had been found in the Schaumburg hotel room. Relative A confirmed that she had not given Minor A permission to leave in the custody of IROEGBULEM. Relative A informed agents that she does not even know IROEGBULEM.

11. Relative A also stated that the following day, January 21, 2014, Minor A left to go to school and never returned. When she did not return home from school, Relative A checked Minor A's social media website and became concerned that Minor A was involved in prostitution. Specifically, Relative A reported seeing a message written by Minor A on her social media website, during which Minor A stated that she had been giving lap dances for money. Law enforcement obtained copies of the social media messages and photographs. Relative A also observed a photograph of Minor A on her social media website, in which Minor A and several other girls were posing suggestively in front of a painted wall.[7] In addition, Relative A noted that over the course of the past month, she had noticed bruises and burn marks on Minor A's skin, at least one of which she photographed. Law enforcement obtained copies of the photograph. Relative A also noticed that Minor A had new clothes, despite not having a job or any income.

Minor B

11. Minor A's account also was corroborated by Minor B. Minor B agreed to be interviewed by FBI agents. Since that time, Minor B has been interviewed by law enforcement agents several times. During those interviews, Minor B confirmed that she was also involved in a sexual relationship with IROEGBULEM.[8] Minor B also stated that IROEGBULEM knew that Minor B was a minor because Minor B

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[7] The photograph was shown to a Rockford police officer. The police officer indicated that he was familiar with the painted wall in the photograph and that the photograph appeared to be taken at a lounge/club in Rockford, Illinois.

[8] Like with Minor A, Minor B provided agents additional information throughout the interviews. The following is a compilation of the what was said during the interviews.

told IROEGBULEM that she was underage. According to Minor B, IROEGBULEM asked her age the first time she met him and she told IROEGBULEM that she was fifteen years old.

12. Minor B also stated that, in around early 2014, she spent a lot of time with both IROEGBULEM and Minor A. During that time, IROEGBULEM admitted to Minor B that he had "pimped" an underage girl in the past. IROEGULEM told Minor B that he ran a prostitution business and that he had a lot of girls.

13. Minor B also stated that during the time she was around IROEGBULEM and Minor A on a regular basis, they spent their nights at various hotels, including the one in Schaumburg, Illinois, where Minor B was found. According to Minor B, IROEGBULEM paid for the hotel rooms in which he and the minors stayed.[9]

14. According to Minor B, IROEGBULEM provided the minors with a significant amount of drugs and alcohol while they were staying in the hotels. Specifically, Minor B informed agents that IROEGBULEM provided her and the others with cocaine, marijuana, and Xanax bars.

15. According to Minor B, Minor A told Minor B that she had performed commercial sex acts at the direction of IROEGBULEM. Specifically, Minor A told

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[9] Agents obtained numerous hotel records from various hotels in the Chicagoland area. Specifically, agents obtained hotel records from at least four major hotel chains. A review of those records revealed numerous hotel room bookings under the name ALLEN C. IROEGBULEM during the time period described throughout this affidavit. The hotel rooms were sometimes paid for in cash, and other times in the same credit card that was used to rent the Schaumburg hotel room described above.

Minor B that Minor A had sexual intercourse with four men in Rockford, Illinois, at the direction of IROEGBULEM. In addition, Minor B stated that she found a video of that incident on IROEGBULEM's Samsung phone. Minor B confronted IROEGBULEM about the video and IROEGBULEM claimed to have taken the video. Minor B reviewed the video and stated that the video depicted Minor A having sexual intercourse with four men.

16. Also according to Minor B, during the time she was regularly hanging out with IROEGBULEM and Minor A, the three of them and another individual (Individual A), drove to a lodge in Wisconsin. On their way to the lodge, Minor B observed IROEGBULEM "shoot up" Minor A with heroin. When they arrived at the lodge, IROEGBULEM and Minor A went into a hotel room.[10] IROEGBULEM came back to the car alone. Minor A was inside the hotel room for about an hour. Once Minor A was back in the car, Minor B observed IROEGBULEM enter the same hotel room from where Minor A had just exited. When IROEGBULEM came back to the car, he had cocaine and cash. Minor A later informed Minor B that she had sex for money while she was in the hotel room.[11]

17. According to Minor B, there was another time in which IROEGBULEM took Minor B and Minor C to a hotel in Woodstock, Illinois. When they arrived at the hotel, all three of them began using drugs provided by IROEGBULEM. During

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[10] Minor B was able to see Minor A enter and exit the hotel room because the door to the room itself was facing the parking lot where Minor B was sitting in IROEGBULEM's car.

[11] Minor A was subsequently asked about the trip to Wisconsin. Minor A confirmed to agents that she, IROEGBULEM and Minor B traveled to Wisconsin, where they were met by Individual A. Minor A also confirmed that she had been trafficked in Wisconsin.

that time, Minor B overheard IROEGBULEM telling someone on the phone that he had a "white girl" who was "down." Shortly thereafter, IROEGBULEM left the hotel room and two men arrived. When the men arrived, they asked Minor B and Minor C who was the "white girl." At that point, Minor B observed the two men go into the hotel bathroom with Minor C. Minor B left the hotel room and returned approximately one hour later. When she came back into the hotel room, Minor B heard screaming. At that point, the two men ran out of the bathroom and out of the hotel room. Minor B went to the bathroom and found Minor C lying in a pool of blood, which appeared to originate from her vaginal area. Minor B helped Minor C by getting her into the bathtub. Minor B later asked Minor C what had happened and Minor C told Minor B that she (Minor C) did not remember anything because of the drugs IROEGBULEM had given her.

18. According to Minor B, the night before she was recovered from the hotel in Schaumburg by the police, IROEGBULEM provided her with a lot of drugs, including Xanax, cocaine, and marijuana. According to Minor B, she, Minor A and IROEGBULEM were all doing the drugs together in the hotel room. At one point, Minor B went to the bathroom and blacked out. When she woke up, she went back into the hotel room and sat on the bed. There were four men she did not know in the room, but Minor A and IROEGBULEM were gone. One of the four men began touching her thigh before she passed out again. When she woke up, she was with the paramedics. At that time, she was not wearing any pants or undergarments and was experiencing pain in her vagina.

14. Minor B's mother allowed agents to search an iPad tablet that Minor B's mother said belonged to Minor B. On the iPad, agents saw photographs of Minor A, Minor B, and IROEGBULEM together in a hotel room, one of which depicted both Minor A and Minor B naked. The photographs were dated January 19, 2014, and January 20, 2014. A location stamp on the photographs indicated that the photographs were taken in the area of the Schaumburg hotel.

Minor C

15. Minor A's account also was corroborated by Minor C. Minor C also agreed to be interviewed by law enforcement agents and was interviewed on several different occasions. During those interviews, Minor C admitted to having a sexual relationship with IROEGBULEM.[12] Specifically, Minor C stated that she met IROEGBULEM through her boyfriend, Individual B. At some point, Minor C and Individual B broke up, and Minor C began dating IROEGBULEM. Minor C stated that she dated IROEGBULEM for several months in early 2014. During that time period, IROEGBULEM asked Minor C her age. Minor C informed IROEGBULEM that she was only fifteen years old. Law enforcement databases confirm that Minor C was 15 years old at the time of the incidents.

16. According to Minor C, during the course of the time that she dated IROEGBULEM, she learned that IROEGBULEM operated a prostitution business. Specifically, IROEGBULEM told Minor C about a woman named "Lulu" who he liked because she let him "pimp her out." IROEGBULEM later explained to Minor

[12] Like with the other Minors, the following is a compilation of information provided by Minor C during the course of several different interviews with law enforcement.

C that he would find girls and bring them to "Lulu," who would in turn prostitute the girls if "Lulu" thought they were acceptable. At a later date, Minor C confronted IROEGBULEM about text messages she had seen on his phone. In response, IROEGBULEM told Minor C that he had been driving a prostitute on dates the previous night, and the prostitute used his phone to send text messages to arrange the dates. In another conversation, IROEGBULEM told Minor C that he "owns" six girls and had their birth certificates. Minor C understood this to mean that he was prostituting the girls he "owned." Minor C specifically knew that IROEGBULEM prostituted Minor A because Minor A was always with IROEGBULEM and because IROEGBULEM told Minor C that he had taken Minor A to see "Lulu" and that "Lulu" was happy with Minor A's work.

17. According to Minor C, she also saw a text message on IROEGBULEM's phone, in which IROEGBULEM asked Minor A's ex-boyfriend[13] if Minor A would be willing to work. Minor A's ex-boyfriend responded by text message that Minor A was not willing to sell her body.

18. According to Minor C, during the time she dated IROEGBULEM, they spent a lot of nights partying in hotel rooms. The hotel rooms were paid for by IROEGBULEM. According to Minor C, Minor A and Minor B were sometimes present at the hotels. Minor C identified Minor A and Minor B both by name and photograph. According to Minor C, when they were at the hotels, IROEGBULEM provided all of them with drugs and alcohol, including cocaine, marijuana and

[13] According to Minor A, she was introduced to IROEGBULEM through her ex-boyfriend, who was friends with IROEGBULEM.

Xanax. According to Minor C, she often passed out after having taken the drugs and she did not remember anything that had happened the night before. According to Minor C, there were times that IROEGBULEM brought other men to the hotel rooms at the time Minor C was taking the drugs. Minor C stated that there were times when she passed out or blacked out in the hotel rooms in Illinois and woke up the next day sore in the vaginal area.

Individual A

19. Individual A agreed to be interviewed by law enforcement.[14] During that interview, Individual A informed law enforcement that he had been friends with IROEGBULEM for year or two. Individual A also informed law enforcement that he met Minor A and Minor B through IROEGBULEM. Individual A identified Minor A and Minor B both by name and photograph. Individual A explained that he used drugs with IROEGBULEM and the minors and partied with them at hotel rooms obtained by IROEGBULEM. Specifically, during those hotel parties, Individual A saw IROEGBULEM giving the girls pills out of a baggie.

20. According to Individual A, prior to the time that he met Minor A, IROEGBULEM offered to allow Individual A to have sex with Minor A for money. Specifically, IROEGBULEM showed Individual A a photograph of Minor A that was on IROEGBULEM's phone. IROEGBULEM then told Individual A that he (Individual A) could have sex with Minor A for $100. Individual A declined because he did not have enough money. IROEGBULEM offered to take $50 up front, with

[14] Individual A has been arrested approximately three times, but has never been convicted of a crime.

an agreement that Individual A would pay IROEGBULEM another $50 later. Individual A said that he still declined because he thought that Minor A looked underage.

Individual B

21. Individual B also agreed to be interviewed by law enforcement. Individual B was Minor C's ex-boyfriend. In late summer 2013, Individual B was serving time in state custody and was housed with IROEGBULEM.[15] Individual B and IROEGBULEM began a friendship, during which they spoke on a regular basis.

22. During the course of those conversations, IROEGBULEM informed Individual B that he (IROEGBULEM) ran a prostitution business. Specifically, IROEGBULEM told Individual B that he arranged for girls to have sex for money and charged approximately $50 for oral sex and anywhere from $100-$300 for sex. IROEGBULEM bragged about the amount of money he made operating his prostitution business.

23. Both Individual B and IROEGBULEM were later released from jail. After they were released, IROEGBULEM contacted Individual B on the phone and asked Individual B whether he would help IROEGBULEM find some girls to sell. Individual B understood this to mean that IROEGBULEM was asking Individual B to help him find young girls to drug and then sell for sex.

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[15] Individual B has been convicted four times, including convictions for theft and disorderly conduct. According to a review of law enforcement databases, in or around July 22, 2013, Individual B was sentenced to thirty days in custody. According to law enforcement databases, beginning August 15, 2013, IROEGBULEM was serving time in the same jail facility.

24. Individual B then went out with IROEGBULEM and introduced him to both Minor C, who was Individual B's girlfriend at the time, and Minor D. After meeting Minor C, but before dating her himself, IROEGBULEM asked Individual B whether Minor C would be willing to "fuck" one of his guys for $10,000. Individual B thought about it, but ultimately said no. During the course of the time that they knew each other, Individual B informed IROEGBULEM that Minor C, his girlfriend at the time, was only fifteen years old.

25. Individual B introduced IROEGBULEM to Minor D while the three of them were in a car. According to Individual B, Minor D was sixteen years old at the time, but he does not know whether IROEGBULEM knew Minor D's age. While they were in the car, IROEGBULEM asked Minor D whether she wanted to make any fast and quick money, which Individual B understood to mean selling herself for sex. Minor D declined.

26. IROEGBULEM also introduced Individual B to "Lulu." IRROEGBULEM, Individual B and "Lulu" were all in the car together. When Lulu got out of the car to go into restroom, IROEGBULEM told Individual B that "Lulu" would perform sex acts on Individual B.

26. In March 2014, Individual B and IROEGBULEM were in state custody together again.[16] They again communicated and talked to each other while in custody together. During that time period, according to Individual B,

[16] Law enforcement databases confirm that the two were in fact housed in the same detention facility in approximately March 2014.

IROEGBULEM informed Individual B that he had been "drugging" his girls and selling them for sex while they were high or passed out.

Individual C

27. In or around September 2013, Individual C was arrested and charged with a drug related offense.[17] As a result, Individual C was housed in state custody with IROEGBULEM, who was serving time for the sexual assault referenced above. Individual C agreed to cooperate with the government. In exchange, the local prosecutor's office recommended that defendant receive probation for his offense. As a result, he has since been released from jail. But for the cooperation with the government, Individual C would have been subject to four years' imprisonment.

28. According to Individual C, he and IROEGBULEM talked on a regular basis while they were in jail. During that time period, IROEGBULEM informed Individual C that he ran a prostitution business. Specifically, IROEGBULEM told Individual C that he was "pimping" and had a lot of "hoes" working for him, which Individual C understood to mean that he was running a prostitution business. IROEGBULEM talked to Individual C about his prostitution business on a regular basis. During the course of those conversations, IROEGBULEM told Individual C that he had a lot of "bitches" that he got from the Schaumburg and McHenry County areas. IROEGBULEM told Individual C that IROEGBULEM's very first prostitute was a girl named "Lulu." IROEGBULEM also told Individual C about other prostitutes IROEGBULEM had working for him. According to Individual C,

[17] Individual C has 14 prior convictions, including for domestic violence and battery.

IROEGBULEM listed Minor A, Minor B, and Minor C.[18] IROEGBULEM told Individual C that Minor A was seventeen years old, but Minor B and Minor C were fifteen years old and offered to hire Individual C as a security guard once they were both out of state custody.

28. According to Individual C, IROEGBULEM informed Individual C that he (IROEGBULEM) got his clients for his girls on Facebook or over text message. IROEGBULEM explained that he made a lot of money and told Individual C that he used young girls. IROEGBULEM told Individual C that he (IROEGBULEM) got hotel rooms where the girls hung out and had their dates. IROEGBULEM said that he provided the girls with a lot of drugs while they were at the hotels, including cocaine, alcohol, marijuana and Xanax. IROEGBULEM said that he bought the girls new clothes all of the time. IROEGBULEM bragged to Individual C that he liked to sit back and smoke marijuana while his girls made money for him. IROEGBULEM told Individual C that there was at least one time that he took the girls to Wisconsin Dells and prostituted the girls while he was there.

29. IROEGBULEM further informed Individual C that he drugged his girls and then accepted money from men who had sex with the girls while they were passed out. Specifically, IROEGBULEM informed Individual C that the girls passed out and IROEGBULEM sent pictures of them to men and encouraged the men to come to the hotel room to have sex with the girls. IROEGBULEM told

[18] IROEGBULEM only told Individual C the girls' first names, which are the same as the first names of Minor A, Minor B, and Minor C.

Individual C there were instances in which the girls wondered what had happened to them the previous night because they were sore in their vaginal areas.

30. After providing the information set forth herein, Individual C agreed to provide proactive cooperation and agreed to consensually record conversations with IROEGBULEM while they were both in state custody. Agents have reviewed the tapes of those conversations, which, when intelligible, corroborate Individual C's account of the conversations he had with IROEGBULEM prior to his cooperation. Specifically, during those recorded conversations, IROEGBULEM confirmed that he ran a prostitution business. The following are two examples, which are based on draft transcriptions completed by agents' preliminary review of the recordings:

a. On June 22, 2014, at approximately 11:30 p.m., IROEGBULEM stated: "Damn, Joe, only have on bitch, if she bad bro, she bad bro, that's everyone [UI] . . . I know a lot of people in Schaumburg bro, Schaumburg got a lot of Indians, those Indians are super thirsty, super duper thirsty . . . Nah, like, I go like, 'cause I used to, like I told you, I used to stay in a lot of hotels for a long time you know, so when I bring a bitch to a hotel they be thirsty like, is this a two for one, you got to hook me up man, [UI], if I spend the money, hell no, [UI], they work like, a lot of them work in the hotels in Schaumburg, Schaumburg full of Indians [UI] . . . you got to stand on that shit, you got to stand on that . . . fuck that, you know the song, know your friends man everybody getting popped with new friends, stick with the people you know, you know what I'm saying, if you don't know them, I ain't fuckin' with no more new girls bro, fuck that shit . . . I ain't trust no . . ." Individual C was interviewed by agents pertaining to this portion of the conversation. Individual C first confirmed that the voice speaking was IROEGBULEM. Individual C then informed agents that he understood IROEGBULEM to be communicating that there were individuals in Schaumburg who were employed at hotels and who would have sex with IROEGBULEM's girls in exchange for money. In addition, IREOGBULEM is conveying his preference to keep trusted prostitutes who he knows to avoid potential problems with law enforcement.

b. On June 23, 2014, at approximately 11:15 p.m., Individual C and IROEGBULEM engaged in another conversation. During that conversation, IROEGBULEM informed Individual C that he knew there was a girl he was interested in ("UF") who told IROEGBULEM, "'change your life bro [UI], I like you but there's like, I feel like there's something on your shoulder you need to get off [UI].' She was right. She was right. [UI]. I was fucking with her. I was fucking with this bitch named 'P' out there, Lulu, I had ho's every day of the week, [UI] doing business, it's hard, pimping girls period, just any girls, [UI], think about it bro, [UI], high on drugs, [UI] I lived out of hotels bro, you know what I'm saying, [UI], and what do you think they see in this hotel, we got to hotels that have cameras, different bitches in and out, and they see me creep from one room to the other, like you don't understand, like seeing me like probably treating their ass [UI], I controlled them, if I tell them go ask this nigga for his cash, they go do it right now, control them and they listen to me, so I can understand now that I'm thinking, [UI] I can understand . . ." Individual C was also interviewed about this conversation and confirmed that the voice speaking was that of IROEGBULEM. In this conversation, agents understand IROEGBULEM to be confirming that he prostituted girls in hotels and that he was concerned about the security cameras at the hotels, capturing him walking from room to room. He also communicated that he kept control over his prostitutes and would tell them to get the money from men who had paid for sex.

CONCLUSION

31. Probable cause exists to believe that ALLEN C. IROEGBULEM trafficked Minor A by force, fraud and coercion, in violation of Title 18, United States Code, Section 1591(a).

FURTHER AFFIANT SAYETH NOT.

FRANK JACK SODETZ III
Special Agent, Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me on February 4, 2015.

Jeffrey Cole
United States Magistrate Judge