

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

IN RE COMPLAINT

Misc. No.

1:14-MJ-2019B

MOTION TO SEAL

The United States of America, by and through its attorneys, Peter F. Neronha, United States Attorney, and Pamela Chin, Assistant United States Attorney, moves that this Motion to Seal and the attached Complaint, Arrest Warrant, Cover Sheet, Supporting Affidavit and this Motion to Seal be sealed until further Order of this Court.

Respectfully submitted,

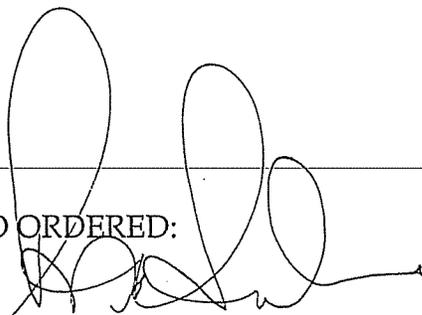
UNITED STATES OF AMERICA  
By its Attorney,

PETER F. NERONHA  
United States Attorney



PAMELA CHIN  
Assistant U.S. Attorney  
U.S. Attorney's Office  
50 Kennedy Plaza, 8th FL  
Providence, RI 02903  
Tel (401) 709-5000  
Fax (401) 709-5001  
Email: Pamela.Chin@usdoj.gov

SO ORDERED:

  
PATERICIA A. SULLIVAN  
UNITED STATES MAGISTRATE JUDGE  
DATE: Sept 4, 2014

FILED

U.S. DISTRICT COURT  
DISTRICT OF RHODE ISLAND

UNITED STATES DISTRICT COURT

for the

District of Rhode Island

United States of America  
v.

1:14-MJ-201975

Case No.

Ricky Wallace, a/k/a Justice, DOB: 1981  
Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay (name of person to be arrested) Ricky Wallace, a/k/a Justice, DOB: 1981, Pawtucket RI, who is accused of an offense or violation based on the following document filed with the court:

- Indictment, Superseding Indictment, Information, Superseding Information, Complaint (checked), Probation Violation Petition, Supervised Release Violation Petition, Violation Notice, Order of the Court

This offense is briefly described as follows:

Sex trafficking of a child, in violation of 18 U.S.C. sec 1591(a) and (b)(2)
Transportation of a minor, in violation of 18 U.S.C. sec 2423(a)

Date: Sept 4, 2014

Handwritten signature of Patricia A. Sullivan

Issuing officer's signature

City and state: Providence, RI

Patricia A. Sullivan, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_ at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title

UNITED STATES DISTRICT COURT

for the District of Rhode Island

United States of America )

v. )

Ricky Wallace, a/k/a Justice, DOB: 1981 )  
Pawtucket, RI )

Defendant )

1:14-cr-00175-2017AS  
Case No.

CRIMINAL COMPLAINT

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

On or about the date of 08/19/2014 in the county of \_\_\_\_\_ in the \_\_\_\_\_ District of Rhode Island, the defendant violated 21 U. S. C. § 1951&2423, an offense described as follows:

Sex trafficking of a child, in violation of 18 U.S.C. sec 1591(a) and (b)(2)

Transportation of a minor, in violation of 18 U.S.C. sec 2423(a)

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent G. Russell Griffiths, Federal Bureau of Investigation

Continued on the attached sheet.

*G. Russell Griffiths*  
Complainant's signature

G. Russell Griffiths, Special Agent

Printed name and title

*Patricia Sullivan*  
Judge's signature

Judge's signature

PATRICIA SULLIVAN, U.S. MAGISTRATE JUDGE

Printed name and title

Sworn to before me and signed in my presence.

Date: Sept 4, 2014

City and state: Providence, Rhode Island

AFFIDAVIT

I, G. Russell Griffiths, being duly sworn, hereby depose and state as follows:

1. I have been employed as a Special Agent by the Federal Bureau of Investigation (FBI) for the past 23 years and am currently assigned to the White Collar Crime Squad of the Providence Resident Office.

2. The facts set forth in this affidavit come from my personal observations, training and experience, as well as information obtained from other law enforcement officers and witnesses. This affidavit is intended to merely show that there is sufficient probable cause for the requested warrant and does not include all of the facts and circumstances known to me about this matter.

3. This affidavit is submitted in support of an arrest warrant and criminal complaint against RICKY WALLACE, a/k/a: "KING JUSTICE", "JUSTICE", "RICK", and (WALLACE), (DOB: 1981), of Pawtucket, Rhode Island, for sex trafficking of a child in violation of 18 U.S.C. § 1591(a)&(b)(2) and transportation with intent to engage in criminal sexual activity in violation of 18 U.S.C. § 2423(a).

4. On August 25, 2014, a 17 year old female (hereinafter Victim1) was located by law enforcement officers at a residence on Ivy Street in Pawtucket, Rhode Island. Special Agent (SA) Justin M. Bowers and Special Federal Officer (SFO) Andrew P. Lawton transported Victim1 to the Providence, Rhode Island, office of the Federal Bureau of Investigation (FBI) to take her statement. Victim1 provided the following information to SA Bowers and SFO Lawton contained in paragraphs 5 through 13.

5. Victim1 had been staying in Arlington, Massachusetts. On Monday, August 18, 2014, she left and went to Boston, Massachusetts. Early the next morning, she was at

South Station in Boston, Massachusetts. She had planned to possibly take a train from South Station to Springfield, Massachusetts to see her father.

6. While at the train station, a man stole the money that Victim1 had for the train ticket. Victim1 knows this man as "Justice." "Justice" told Victim1 to go with him outside if she wanted her money back. Victim1 told investigators that outside of South Station, Justice and two other men forced her into a vehicle against her will. She was driven away from the area by a female known to her as "Kitty," subsequently identified and known to the United States Government (hereinafter Kitty), and a male known as "Daddy," subsequently identified as Kemont BOWIE. Kitty was the driver; BOWIE was the front seat passenger. Through a photo array, Victim1 subsequently positively identified "Justice" as Ricky WALLCE (DOB: 1981).

7. According to the Victim1, she was driven to Pawtucket, Rhode Island, and housed at the same residence where she was located on August 25, 2014. At the residence, BOWIE and Kitty left her with Kitty's minor child and left for the night.

8. On Wednesday, August 20, 2014, BOWIE and Kitty returned, and Victim1 began to receive "training" in regard to prostitution. She was initially told that because of her age, she would have to wait before doing a few calls. She was taught about "the life" or "the game" which she explained is the prostitution business. Victim1 identified BOWIE as the pimp; WALLACE as a recruiter or 'catcher'; and Kitty as a prostitute who brings in the most money. Victim1 learned BOWIE and Kitty had advertisements on "Back Page." As part of her training, when clients came to the apartment, BOWIE and Victim1 would listen in the other room.

9. On Wednesday night, Victim1 was made to go on a "walk" with KITTY to learn how to find clients. That night, Kitty declined offers from potential clients, and as a result, Kitty was punished by BOWIE who struck Kitty according to Victim1. BOWIE also yelled at the Victim1.

10. On Thursday, August 21, 2014, Kitty had visits from her regular clientele. BOWIE suggested that Victim1 do "calls" with KITTY. Victim1 said that "calls" were acts of prostitution involving sexual intercourse for money. Victim1 stated that she did a few "calls" with Kitty at the apartment.

11. On Friday, August 22, 2014, JUSTICE came by and brought another female (hereinafter Victim2) with him that he had also found in Boston, Massachusetts. Victim1 said that the female's nickname was "Daisy". This female knew Victim1 by the name "STAR," a nickname given to Victim1 by BOWIE. Victim1 was used to help take photographs of Daisy for a "Back Page" advertisement.

12. On Saturday, August 23, 2014, Victim1 did a few more "calls" with KITTY with clients coming to the apartment. Victim1 stated she and KITTY were involved in acts of sexual intercourse with clients. Victim1 also explained the fee structure charged for sexual intercourse.

13. On the morning of August 25, 2014, Victim1 asked for and received permission to go running for exercise. She took a cellular telephone with her. Victim1 called the program that she had left in Arlington, Massachusetts, spoke with a worker at the facility, and asked for help. Victim1 hid in the woods near a running track, but BOWIE and his friends found her and brought her back to the apartment. While at the

apartment, Victim1 took a shower, as there were calls scheduled later that day with some "high rollers." When BOWIE and Kitty left the apartment that day, Victim1 called for help again - this time with the address of where she was. Victim1 was located by law enforcement officers a short time later.

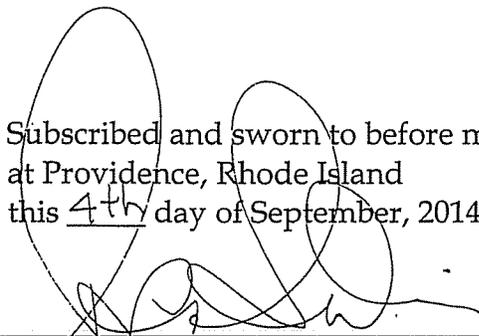
14. Members of law enforcement remained at the scene where Victim1 was rescued. BOWIE and Kitty returned to the residence later that afternoon. Kitty has provided recorded statements to investigators detailing her interaction with Victim1 and BOWIE. Initially, Kitty denied Victim1 was involved in prostitution, however, Kitty eventually admitted that Victim1 did participate in an act of sexual intercourse in exchange for money from one of Kitty's regular clients. Kitty stated that WALLACE was in Boston to find a "catch", someone who could be used for prostitution. Kitty stated that she and BOWIE picked up Victim1 in the Boston area and brought her to Rhode Island. Kitty stated that both she and BOWIE were aware that the Victim1 was 17 years old. Kitty stated, "I guess you could say that [BOWIE]'s my pimp." Kitty said that BOWIE keeps her safe, and she gives BOWIE all her money.

15. On Friday, August 29, 2014, WALLACE was arrested on a bench warrant issued from the Providence Superior Court. Subsequent to his arrest, WALLACE was advised of his Miranda right and signed a rights form indicating that he understood his rights. ~~Your affiant was present for this interview along with other members of law enforcement.~~ WALLACE told investigators that Kitty works for BOWIE and that BOWIE controls Kitty. WALLACE admitted that he knew Victim1. WALLACE also admitted that he saw Victim1 in the area of South Station in Boston. WALLACE stated

that he was in the area looking for girls that could be used for prostitution. WALLACE said that he was working with BOWIE who was the pimp. WALLACE said that he talked to Victim1, and then they walked to a library where WALLACE used a computer to contact BOWIE to come to Boston to pick up Victim1. WALLACE stated that BOWIE's plan for Victim1 was to WALLACE said that BOWIE was driven to Boston by Kitty. WALLACE said that he, Victim1, Kitty and BOWIE ate at Subway and then BOWIE, Kitty and Victim1 left for Rhode Island. WALLACE stated that a few days after seeing Victim1 in Boston he also met Victim2 at South Station in Boston. WALLACE stated that they smoked marijuana, and then WALLACE called BOWIE to come pick them up. WALLACE stated that Kitty arrived with BOWIE and all four returned to Rhode Island in Kitty's car.

  
G. RUSSELL GRIFFITHS  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me  
at Providence, Rhode Island  
this 4<sup>th</sup> day of September, 2014.

  
PATRICIA A. SULLIVAN  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF RHODE ISLAND

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY:  INFORMATION  INDICTMENT  COMPLAINT

CASE NO. \_\_\_\_\_

Matter Sealed:  Juvenile  Other than Juvenile  
 Pre-Indictment Plea  Superseding  Defendant Added  
 Indictment  Charges/Counts Added  
 Information

USA vs.

Defendant: Ricky Wallace, a/k/a Justice

LKA: Pawtucket, Rhode Island

Address: \_\_\_\_\_

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND  
 DISTRICT OF RHODE ISLAND Divisional Office

Name and Office of Person Furnishing Information on THIS FORM PETER F. NERONHA  
 U.S. Atty  Other U.S. Agency  
 Phone No. (401) 709-5036

Name of Asst. U.S. Attorney (if assigned) Pamela E. Chin

Interpreter Required Dialect: \_\_\_\_\_

Birth Date 8/4/1981  Male  Alien  
 Female (if applicable)

Social Security Number 230-23-8884

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)  
Federal Bureau of Investigation

person is awaiting trial in another Federal or State Court (give name of court)

this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. Atty  Defense

this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAG. JUDGE CASE NO.

Place of offense RHODE ISLAND County \_\_\_\_\_

**DEFENDANT**

Issue:  Warrant  Summons

Location Status: \_\_\_\_\_

Arrest Date \_\_\_\_\_ or Date Transferred to Federal Custody \_\_\_\_\_

Currently in Federal Custody

Currently in State Custody

Writ Required

Currently on bond

Fugitive

Defense Counsel (if any): \_\_\_\_\_

FPD  CJA  RET'D

Appointed on Target Letter

This report amends AO 257 previously submitted

**OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS**

Total # of Counts 2

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
1	18 U.S.C. sec 1591(a) and (b)(2)	Sex trafficking of a child	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
2	18 U.S.C. sec 2423(a)	Transportation of a minor	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor