

UNITED STATES DISTRICT COURT

for the
District of Rhode Island

FILED
MAY 01 2015
U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

United States of America
v.

Paul Monteiro; DOB 1985; Providence, Rhode Island
Defendant

Case No.

1-15 MJ 143 PAS

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) PAUL MONTEIRO,
who is accused of an offense or violation based on the following document filed with the court:

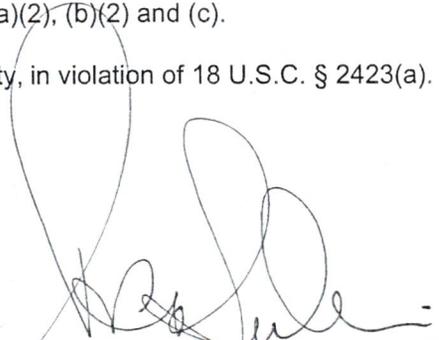
- Indictment
 Superseding Indictment
 Information
 Superseding Information
 Complaint
 Probation Violation Petition
 Supervised Release Violation Petition
 Violation Notice
 Order of the Court

This offense is briefly described as follows:

Sex trafficking of a child, in violation of 18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(2) and (c).

Transporting a child with intent to engage in criminal sexual activity, in violation of 18 U.S.C. § 2423(a).

Date: May 1, 2015



Issuing officer's signature

City and state: Providence, Rhode Island

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

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v.
PAUL MONTEIRO
DOB 1985
Providence, Rhode Island
Defendant

Case No.

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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 04/06/2015 in the county of in the District of Rhode Island, the defendant violated 18 U. S. C. § 2423(a), an offense described as follows:

and 18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(2) and (c)

Sex trafficking of a child, in violation of 18 U.S.C. §§ 1591(a)(1), (a)(2), (b)(2) and (c).

Transporting a child with intent to engage in criminal sexual activity, in violation of 18 U.S.C. § 2423(a).

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent James Richardson, Immigration and Customs Enforcement Homeland Security Investigations.

Continued on the attached sheet.

Complainant's signature

James Richardson, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: May 1, 2015

Judge's signature

City and state: Providence, Rhode Island

Patricia A. Sullivan, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, James V. Richardson, Special Agent with the Department of Homeland Security, Homeland Security Investigations (HSI), having been duly sworn according to law, depose and state as follows:

1. I am a Special Agent with HSI and am currently assigned to Homeland Security Investigations, Resident Agent in Charge, Providence, Rhode Island. I have been employed as a Special Agent with HSI since April of 2009. As a Special Agent, my work concentrates on child exploitation cases, specifically those involving the trafficking of children, which rely heavily on computer based investigations. I have received specialized training in this area including Internet Crimes Against Children (ICAC) training involving, among other things, computerized investigative techniques. I have participated in numerous computer related investigations including those involving production, distribution and possession of child pornography as well as the trafficking of children. I am currently assigned to the ICAC Task Force in Rhode Island. Further, I am authorized and assigned to investigate violations of federal criminal law, including 18 U.S.C. § 2423 et seq. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

2. This affidavit is submitted in support of an arrest warrant and criminal complaint for PAUL J. MONTEIRO, a/k/a "Peezy," (DOB: XX-XX-1985), of Providence, Rhode Island, for violations of 18 U.S.C. § 2423(a), transportation of a minor with intent

to engage in prostitution or criminal sexual activity; and 18 U.S.C. § 1591, sex trafficking of a person who has not attained the age of 18 (TARGET OFFENSES).

3. The statements contained in this affidavit are based upon my own investigation as well as information provided to me by other federal, state and local law enforcement officers. In particular, I relied on information provided to me by Detective Adam Houston of the Rhode Island State Police. This affidavit is being submitted for the limited purpose of securing an arrest warrant and criminal complaint, therefore, I have not included each and every fact known to me concerning this investigation, only those facts sufficient and necessary to establish probable cause to believe that MONTEIRO committed the TARGET OFFENSES.

SOCIAL NETWORKING SITES AND FACEBOOK

4. "Social networking" or "social network service" is a term used to describe applications or websites which focus on establishing networks or relationships among individual users based on interests or activities. These services typically consist of a personal online representation of an individual, often referred to as a profile, a list of other individuals with which a person has interests or allowed to view their profile, and a variety of other capabilities, such as the upload and sharing of images and videos. Newer capabilities allow access to the social networks via mobile devices such as cellular telephones and the upload of real-time information to an individual's profile. Most, if not all, of the social networks are accessible via the Internet and allow a member to contact other members via electronic mail (e-mail), instant messaging, or comments placed directly to a member's profile. Normally, information posted by

individuals to their own or another individual's profiles are not vetted for accuracy or content.

5. Facebook (www.facebook.com) is an interactive, online, social networking site founded in 2004 with corporate offices located in Palo Alto, California, and, as of 09/02/2010, has over 500 million registered members based on information derived from the company's website.

6. Membership on Facebook is free to anyone. To create an account, an individual must provide a first and last name, e-mail address, account password, sex, and date of birth. Once this information is submitted, a security page requiring two words displayed on the website to be typed into an entry field is accessed. Once the two words are entered, three optional steps are provided by Facebook: 1) import friends from an existing e-mail account; 2) upload an image to the newly created profile to serve as the account's profile picture; and 3) complete basic profile information such as location, employer, and educational institutions. Once these steps are completed or by-passed, the profile page for the new account is available. Prior to the account being fully usable, a confirmation e-mail must be read and an associated hyperlink visited to confirm the validity of the e-mail used to open the account. This account activation via e-mail is the only information confirmed during the set-up process. The primary feature of Facebook is the creation of a social network via the use of a "Friends List." Other content located on an individual's Facebook profile is determined by the member, with options to include images/photo albums and either pre-recorded or live-recorded videos. Facebook account members are added to an individual's "Friends List" via a

request that can either be accepted or declined. Once a person is a "Friend", additional information on that member's profile may become visible based on the privacy settings for that particular account.

7. Privacy settings for individual Facebook accounts can be tailored to allow only certain individuals to view each area of a member's profile. These settings consist of "Everyone," "Friends of Friends," "Only Friends," and "Customize." Within the "Customize" option, a member can further restrict who can or cannot view certain areas based on the previous privacy options or by individual account names / identifiers. The "Everyone" setting allows all members of Facebook to view a particular area, whereas the "Only Me" setting located in "Customize" would allow only the Facebook member to view content within their profile.

8. Facebook also allows members to create groups that have a common interest, but are not necessarily on a particular "Friends List." The creation of a group requires a confirmed Facebook account via e-mail, a group name, a description of the group, and a two tier category for what the group is interested in. Once this information is completed, group settings similar to the regular member account are accessible. These settings cover the upload of images, videos, links to other Internet locations, and general privacy/accessibility options. For the privacy/accessibility options, there are three settings: 1) Open- which allows anyone to join and to be able to invite others to join the group. Group information and content is viewable by all Facebook members and can be indexed by search engines; 2) Closed- which requires an administrator of the group to approve new membership requests, the group's

description is viewable by anyone, but only members can see certain areas, such as photos and videos; and 3) Secret - which requires an invitation by an existing member, the group itself will not appear in member profiles or search results, and information and content is only viewable by members. Once an individual becomes a member of either a Closed or Secret group, he/she is able to view all photos and videos posted by other members of that same group.

9. Upon creation of either a new Facebook user account or group, a unique numeric identifier is assigned. This unique numeric identifier does not change and is not re-assigned to other accounts or groups.

INVESTIGATION

10. The minor victim (MV1), born in 2000, is a fourteen year old female who was reported missing around November of 2014. At the time of being reported missing, MV1 was residing at a group home in Rhode Island.

11. MONTEIRO is a 29 year old male from Providence, Rhode Island.

12. On or about March 23, 2015, Rhode Island State Police (RISP) Detective Adam Houston received information from the National Center for Missing and Exploited Children (NCMEC) regarding MV1. NCMEC advised Detective Houston that a caller (CI1) reported the sexual molestation of a juvenile female friend (MV1) whom he met on Facebook. CI1 identified the victim's age as approximately fourteen (14) years old. CI1 advised NCMEC that he had been in communication with MV1 for several months through Facebook messaging and texting via cellular telephone. CI1 further advised that MV1 disclosed that she was sexually active with an adult male and

that she was afraid to end the relationship due to threats of bodily harm. CI1 identified the adult male as MONTEIRO. The following are pertinent text message communications between CI1 and MV1 via cellular:

CI1: Who? Your stuck with?

MV1: That guy I was tellin you about...b

MV1: He told me if i ever get pregnant Hes punchking me in my face.

MV1: And turns out he has human trafficking charges and shit

CI1: Don't tell me what I think your telling me

MV1: He toldme he was 28, I looked at his liscense he was 30 like why lie about two years?

MV1: I didn't think it would turn into anything more but I had his phone by accident after we hung out with my friend and then he came back to get it and then after that we started chill in and shit

MV1: And then idk what to do anymore

MV1: I'm more scared avout the fact he's a pimp knowing where I live

CI1: That needs to end kid this is not something you should be doing

MV1: You don't get it (CI1)

CI1: I'm honestly disappointed in

13. On or about March 23, 2015, Detective Houston conducted an inquiry through law enforcement databases for MV1 revealed an active family court order was issued on November 20, 2014 by the Rhode Island Department of Children, Youth and Families, reporting MV1 as a runaway. Detective Houston also conducted an internet

search of various social media websites and revealed a Facebook profile created by MV1. Detective Houston viewed MV1's Facebook profile and observed several images of MV1's face and body, which matched the description provided by CI1.

14. On or about April 6, 2015, Detective Houston learned that MV1 corresponds with a friend, MV2, via cellular telephone. Detective Houston responded to MV2's residence to conduct a consensual interview of MV2. MV2 is a 15 year old female. After obtaining consent from MV2's mother, Detective Houston interviewed MV2. MV2 advised Detective Houston that she first met MV1 in a group home in 2014. MV2 further stated she has maintained communication with her through Facebook and talking on the phone. MV2 provided Detective Houston with MV1's cellular telephone number. MV2 stated she last had communication with MV1 on April 5, 2015. When asked what they talked about, MV2 stated MV1 told her, "how bad she hates her life" and "how she wishes things were better." MV2 further stated that a couple days prior to their last communication, MV1 advised her she was in New Jersey with "Peezy." When asked to elaborate on that conversation, MV2 advised us that all MV1 stated was "we are going to make a lot of money." Additionally, MV2 advised us that "Peezy" was one of her Facebook friends. MV2 then showed Detective Houston "Peezy's" Facebook page, "www.facebook.com/hpeezy.jerome." After viewing the aforementioned Facebook page and the pictures associated with it, Detective Houston found the photographs of "Peezy" to be consistent with the license photograph of MONTEIRO. Furthermore, MV2 stated she was one hundred percent sure that the license photograph of MONTEIRO was the same person as "Peezy." When asked about MV1's relationship

with MONTEIRO, a/k/a "Peezy," MV2 told us that MV1 and MONTEIRO have had sexual intercourse. When asked how she knew this, MV2 stated that MV1 told her that she has had genital to genital intercourse with MONTEIRO and that MONTEIRO has ejaculated inside her vagina.

15. On or about April 6, 2015, Detective Houston requested an emergency global positioning system (GPS) "ping" of MV1's cellular telephone. Sprint Electronic Surveillance, Corporate Security responded to the request and identified MV1's cellular telephone to be last used in the Franklin Township, New Jersey.

16. On or about April 6, 2015, the Federal Bureau of Investigation (FBI) and HSI, New Jersey, assisted in the investigation by locating MONTEIRO and MV1 at an Extended Stay America located at 30 World's Fair Drive in Franklin, New Jersey. The FBI and HSI, New Jersey were able to obtain a copy of an invoice from staff at the Extended Stay America. The invoice revealed that room 206 was paid for using an American Express credit card in MONTEIRO's name.

17. On or about April 6, 2015, after confirming with staff that MONTEIRO and a female were registered in room 206, agents and officers approached and knocked on door 206. After a few knocks on the door MONTEIRO answered the door. MV1 was also located inside the room. Agents from HSI secured MV1 and brought her to a different area of the hotel where they could speak with her. MV1 spoke with HSI Special Agent (SA) Craig Vanderhoff and stated to him that she and MONTEIRO did have sex in the hotel room. While SA Vanderhoff was speaking with MV1, another agent located a Backpage.com advertisement where a female was soliciting for male

companionship. While reviewing this advertisement it was determined that the photos that were posted on the ad were those of MV1. In the advertisement the female had a tattoo on the right side of her neck on top of her shoulder. The photos also showed that the female had a distinct manicure in that her finger nails were pointed at the tips and were painted pink. Both the tattoo and fingernails matched that of MV1. When questioned about the ad, MV1 denied being in the ad and then refused to speak to anyone. Based upon your affiant's experience and training, your affiant is aware that *www.backpage.com* is a web site that is often used to post advertisements for escort services which include sexual services for a fee.

18. On or about April 7, 2015, SA Jodie Donaghy and your affiant met with HSI agents in New York to transport MV1 back to Rhode Island. MV1 made several statements while traveling back to Rhode Island with SA Donaghy and your affiant. MV1 stated that she had placed the ad on Backpage.com using her cellular telephone and that she paid for the ad using a pre-paid card she took from the glove box of MONTEIRO's car. MV1 also stated that she traveled from Rhode Island to New Jersey with MONTEIRO and that they were going to be traveling to New York because MONTEIRO had to meet up with someone.

19. Upon arriving in Rhode Island, MV1 was taken to Hasbro Children's Hospital in Providence, RI. Your affiant contacted the Department of Children, Youth and Families (DCYF) and a representative met your affiant at the hospital. Prior to leaving the hospital, your affiant seized one HTC cellular telephone from MV1.

20. On or about April 13, 2015, Forensic Interview Specialist (FIS) Alexandra Levi conducted a forensic interview of MV1. During the interview, MV1 stated that she met MONTEIRO on Facebook through some mutual friends. MV1 stated that she told MONTEIRO that she is 17 years old. MV1 stated that she stayed with MONTEIRO at his house in Cumberland, Rhode Island, and that while staying there, MONTEIRO recorded MV1 performing oral sex on MONTEIRO using his cellular phone. MV1 identified herself in the Backpage.com advertisement from New Jersey. MV1 stated that MONTEIRO drove her to a customer's apartment building in New Jersey in response to her Backpage ad. According to MV1, that customer could not get an erection so she took his money and left. MV1 stated that another customer responded to the Extended Stay America in New Jersey in response to her Backpage ad and that she (MV1) had vaginal intercourse with this customer using a condom.

21. On or about April 14, 2015, FIS Levi conducted a forensic interview of MV2. During the interview, MV2 stated that MV1 told her that she was having sex with MONTEIRO. MV2 stated that MV1 wanted MV2 to come with her and MONTEIRO to New Jersey and told her that she would make a lot of money. MV2 stated that MONTEIRO would take all the money MV1 would make but that MONTEIRO would buy her things like clothing. MV2 stated that MONTEIRO and MV1 picked her up in MONTEIRO's car once and that MONTEIRO provided MV1 and MV2 with marijuana to smoke. MV2 also stated that MONTEIRO asked MV2 to work for him, but MV2 declined.

22. The Franklin Township Police Department (FTPDP) executed a state authorized search warrant on MONTEIRO's cellular phone following his April 6, 2015 arrest. FTPDP reported to your affiant that a video was found on MONTEIRO's cellular phone depicting MV1 performing oral sex on MONTEIRO. FTPDP also reported that the images in MV1's Backpage.com ad were also found on MONTEIRO's cellular phone. The internet history on MONTEIRO's cellular phone revealed that he placed the escort ad for MV1 on Backpage.com.

23. Based on the foregoing, I believe that there is probable cause to believe that MONTEIRO committed the TARGET OFFENSES.



JAMES V. RICHARDSON
Special Agent, Department of Homeland
Security

Sworn and subscribed in my presence
on this 15th day of May 2015.



PATRICIA A. SULLIVAN
United States Magistrate Judge
District of Rhode Island