

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

CASE NUMBER: 3:18-mj- 1156-PDB

RICHARD ANTHONY MOFFETT
a/k/a "Mook"

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From on or about April 10, 2017, through on or about May 17, 2017, in Duval County, in the Middle District of Florida, and elsewhere, the defendant, RICHARD ANTHONY MOFFETT, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit a person, that is S.A., while knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause such persons to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591. I further state that I am a Special Deputy U.S. Marshal (task force officer) assigned to the Federal Bureau of Investigation (FBI) Jacksonville Child Exploitation Task Force, 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


Signature of Complainant
Scott Guess

Sworn to before me and subscribed in my presence,

April 30, 2018 at 11:59 A.M.

Jacksonville, Florida

PATRICIA D. BARKSDALE
United States Magistrate Judge


Signature of Judicial Officer

AFFIDAVIT

I, Scott Guess, being a duly sworn, depose and state that:

IDENTITY OF AFFIANT

1. I am a Special Deputy U.S. Marshal (task force officer) assigned to the Federal Bureau of Investigation (FBI) Jacksonville Child Exploitation Task Force. I have been employed with the Jacksonville Sheriff's Office (JSO) since 1994. Before being assigned to investigate human trafficking in October of 2016, I was assigned to the Vice/Narcotics Unit for approximately 10 years. I have training and experience in the preparation, presentation, and service of criminal warrants and training and experience in the service of arrest warrants.

2. Based on my training and experience as a Detective with JSO, I have participated in investigations involving the unlawful possession, sale, or trafficking of narcotics. In some of these investigations, I have been the case agent, while in others I have acted in an undercover capacity dealing directly with the targets of the investigation.

3. The information contained in this affidavit is based upon information relayed to me by local law enforcement officers and my review of records, documents and physical evidence obtained during this investigation.

4. The information provided in this affidavit does not include each and every fact known to me, but rather, information sufficient to establish probable cause for the requested criminal complaint.

REQUESTED CRIMINAL COMPLAINT

5. Based on the information in this affidavit, I request that a criminal complaint be issued for Richard Anthony MOFFETT for violating the provisions of 18 U.S.C. § 1591.

FEDERAL LAW

6. I am familiar with federal law including 18 U.S.C. § 1591, which prohibits anyone from trafficking any person in the commercial sex industry by means of force, fraud, or coercion.

INVESTIGATIVE ACTIVITY

7. On May 17, 2017, a female whose initials are S.A. was arrested at 570 Busch Drive in Jacksonville, Florida, during a JSO undercover prostitution investigation. After S.A. had been arrested, she became very upset and said to Sergeant W. Nelson #7498 and Detective R. Bennett #6603, "he will be coming looking for me." A short time later, Richard Anthony MOFFETT was contacted and identified by JSO officers as he was walking through the Gate gas station parking lot located at 570 Busch Drive. During this contact, the JSO officers completed a Field Investigative Report. MOFFETT provided 330-962-0461 as his cell phone number for that report.

8. On May 17, 2017, Special Deputy U.S. Marshall (task force officer) Chris Sullivan, who is also assigned to the Federal Bureau of Investigation (FBI) Jacksonville Child Exploitation Task Force, and I interviewed S.A. She gave an account of having been coerced to engage in prostitution activity by an individual who she referred to as "Mook." S.A. identified the individual later identified as Richard Anthony MOFFETT as "Mook" to

Det. Bennett as she saw him walking through the parking lot prior to him being contacted by JSO at the time of her arrest. S.A. said that she met MOFFETT through her husband, who had purchased drugs from MOFFETT in the past. S.A. said that sometime around the beginning of April 2017, she and her husband had split up and she had become homeless. S.A. had been sitting on the curb in the area of 1000 Airport Road in Jacksonville, Florida, when MOFFETT approached her and told her that she could stay with him at the Best Airport Inn. Once at the hotel, S.A. said that MOFFETT was nice, bought her food and let her sleep there. The next day, MOFFETT told her that if she was going to stay there she was going to have to post on Backpage.com and “bring in money.” S.A. initially was led to believe by MOFFETT that she would be spending time with men providing company in exchange for money. Prior to her first customer, MOFFETT explained to S.A. that if the customers wanted to engage in various sex acts during the date that she was to engage in that as well. S.A. said that MOFFETT’s girlfriend “Kimmy” took pictures of S.A., set up a Backpage.com account, and started posting ads on the internet. S.A. said that on her first night she brought in \$600.00 by participating in commercial sex acts as a result of these advertisements, and MOFFETT referred to her as his “goldmine.”

9. S.A. stated that, over the next month, she worked for MOFFETT out of fear of being forced out again and becoming homeless. S.A. stated that, as time passed, she observed MOFFETT physically beat another female whose initials are S.B. on several occasions. S.A. feared that MOFFETT would beat her as well if she did not continue to work for him. S.A. witnessed MOFFETT physically beat S.B. for being lazy and not

reposting her ads, or when MOFFETT found S.B. withholding money that she had earned as a result of a commercial sex “date.” S.A. observed that when MOFFETT would beat S.B., he would tell S.B. “there’s a consequence for every decision.” S.A. said MOFFETT began telling her the same thing from time to time, and this made S.A. feel that if she did not comply with MOFFETT, he would beat her as well.

10. S.A. said that she had to give all of the money that she earned from engaging in commercial sex acts to MOFFETT. MOFFETT would then make sure that S.A. had a place to stay, food, and drugs. S.A. was a drug user when she met MOFFETT. However, while she was working for MOFFETT, he provided heroin, crack cocaine, and marijuana to her. Neither S.A. nor any of the other girls were allowed to purchase drugs from anyone other than MOFFETT. MOFFETT would routinely appoint S.A. or another female to watch over S.B., and MOFFETT would provide instructions not to let S.B. out of their sight.

11. A consensual forensic search of S.A.’s cell phone was conducted, and I have reviewed the report. In S.A.’s contacts list there was an individual named “Mook” with a number of 330-962-0461. There were text messages between S.A. and “Mook” wherein S.A. advised him when someone was coming to the room, when they got there, and when they left. There were also messages between them wherein S.A. would discuss the price that was paid for a commercial sex “date.” There was one particular text message conversation between S.A. and “Mook” wherein S.A. asks if it is ok to walk out of her room and into the parking lot, and “Mook” gives her permission. S.A. then thanked

“Mook.” There were 181 calls to or from the contact “Mook” to S.A.’s cell phone between April 21, 2017, and May 17, 2017.

12. On June 9, 2017, Task Force Officer Sullivan and I interviewed a female whose initials are S.B. S.B. said that she met MOFFETT (who she referred to as “Mook”) sometime around the beginning of April 2017. S.B. said that at first she started purchasing heroin from MOFFETT and hanging around him as a friend. She said that she went on a trip to Cleveland, Ohio, with MOFFETT and one other female who was a prostitute at the time. She said that they stayed at the Red Roof Inn and that the female whose nickname was “Kelly” took dates from Backpage.com while they were there.

13. S.B said that once back in Jacksonville, MOFFETT convinced her to begin posting on Backpage.com. S.B. had to give all of the money that she earned from engaging in commercial sex acts thorough prostitution to MOFFETT. She said that MOFFETT himself or one of the other girls would take pictures of her and then post them on Backpage.com. S.B. said that she was never allowed to see the Backpage.com ads. S.B. stated that MOFFETT set the prices for the commercial sex acts S.B. was to engage in; a “quick visit” was \$80, half hour was \$120, and an hour was \$200. When customers would call or text the number in S.B.’s ad, MOFFETT or one of the other girls would handle the correspondence; MOFFETT never let S.B. speak to anyone.

14. S.B. said that MOFFETT made her stay in the hotel room and would not let her leave. Often times, MOFFETT would make S.B. stay in the bathroom with the door closed. S.B. said that MOFFETT would never leave her unattended. MOFFETT always

had one of the girls keeping watch over S.B. to ensure that she did not leave. On several occasions, MOFFETT threatened to kill S.B.'s children if she ever left him. S.B. felt this was a genuine threat because MOFFETT knew where her children were living.

15. MOFFETT would provide heroin to S.B., however, on several occasions MOFFETT withheld heroin from S.B. as punishment when she did something that made him angry. MOFFETT would withhold heroin until S.B. got sick from withdrawal and then give her enough to make her feel better again. S.B. stated that MOFFETT hit S.B. on several occasions with an open hand. S.B. said that MOFFETT hit her for being lazy and for trying to keep a portion of the money that she earned from engaging in commercial sex acts.

16. S.B. said that during her time with MOFFETT, they stayed at the following locations: River City Inn, located at 10888 Harts Road; Best Airport Inn, located at 1077 Airport Road; Red Roof Inn, located at 10901 Harts Road; and Quality Inn, located at 1351 Airport Road, all of which are located in Jacksonville, Florida.

17. On June 19, 2017, Task Force Officer Sullivan and I interviewed a female whose initials are D.D. D.D. said that she had met MOFFETT (who she referred to as "Mook") approximately six or seven months prior at the Best Airport Inn, located at 1077 Airport Road, Jacksonville, Florida. Initially, D.D. was purchasing crack cocaine from MOFFETT, however, MOFFETT told D.D. that if she needed a place to stay, she should give MOFFETT a call. D.D. said that she started engaging in commercial sex acts for MOFFETT sometime in mid-December 2016. MOFFETT told D.D. that he would take

care of paying for her hotel rooms, food, and supply her with drugs (heroin and crack cocaine), and in exchange she would have to engage in prostitution and give him all of the money that she earned. D.D. said that neither she nor any of the other girls that were working for MOFFETT were allowed to buy drugs from anyone except MOFFETT.

18. D.D. said that there were instances where D.D. had been awake for days and did not want to work; MOFFETT would threaten to beat D.D. and tell her to get up, get cleaned up, and start working trying to get "dates." D.D. provided an account of events that had occurred sometime around the end of February or beginning of March 2017 when she was staying at the River City Inn located at 10888 Harts Road, Jacksonville, Florida, wherein MOFFETT had thought she took \$50.00 of his money. D.D. said that MOFFETT came into the room with a handgun, pointed it at her, and told her that if she did not give him his money that he was going to kill her. D.D. was able to break away and run out of the room door. MOFFETT grabbed D.D. by her hair and hit D.D. in the back of her head with the handgun. MOFFETT eventually let D.D. go because there were several people in the parking lot.

19. Sometime around the end of April or beginning May 2017, D.D. was staying at the Best Airport Inn at 1077 Airport Road. She said that at this time she was not working for MOFFETT, however, he had all of his girls working out of that hotel. The above mentioned female victims, S.A. and S.B., were both working for MOFFETT at that time. D.D. said that S.B. left a hotel room where MOFFETT had her staying and came down to D.D.'s room. D.D. said that she witnessed MOFFETT come down to D.D.'s

room and hit S.B. in the face with the back of his hand. MOFFETT told S.B. that she needed to get back to her room and get back to work. D.D. said that MOFFETT never left S.B. unattended and did not let her leave the hotel room.

20. A subpoena was issued to Sprint for the records pertaining to telephone number 303-962-0461. The results returned the following subscriber information: Billing Account Number #261682476, Account Establish Date: February 10, 2016, Account Expiration: Active "through date searched", Account Billing Address: Richard MOFFETT 1400 S. Arlington St. Akron, Ohio 44306, Network Access Identifier: RICHARDMOFFETT@MYBOOSTMOBILE.SPRINTPCS.COM. The results indicated the following:

- a. Between May 07, 2017 and May 17, 2017 there were forty-six text messages and twenty-one voice calls from that number to 904-556-7572. S.A. identified this number as a TextNow app number which was used in Backpage.com ads to advertise her for commercial sex acts. There were 33 ads located on Backpage.com with a contact number of 904-556-7572, which depicted images of S.A. during the period of May 7, 2017, to May 16, 2017. In total there were 83 Backpage.com ads with this number and images of S.A. from April 26, 2017, to May 16, 2017.
- b. On May 13, 2017, there was one voice call to 904-256-9878. This number was identified by both S.A. and S.B. as being the TextNow app number which was used in Backpage.com ads to advertise S.B. for commercial sex acts. There

were ads located on Backpage.com with the aforementioned number which depicted images of S.B.

c. Between May 14, 2017, and May 15, 2017, there were twenty text messages and one voice call to 904-601-4677. This number was identified by S.A. as a TextNow app number which was used for Backpage.com ads for an unknown female that was working for MOFFETT at the time. There were Backpage.com ads that had this number listed with the name of "Lovely Lola" during that time period.

21. On November 15, 2017, Task Force Officer Chris Sullivan and I conducted a video recorded interview of MOFFETT. MOFFETT was advised of his *Miranda* rights via form, which he initialed and signed.

22. MOFFETT stated that he had come to Jacksonville from Cleveland, Ohio, in November of 2016. MOFFETT was living in hotels off of Dunn Avenue. MOFFETT stated that he lost his job and started doing side work. MOFFETT stated that he had females that would come to him saying "Mook can you help me with this and that." According to MOFFETT, these females might be on Backpage.com and need him to help by buying them an Amazon.com card or getting their hotel room for them, or the like. MOFFETT said they might call him because someone was tearing up their room and getting out of hand, so he would go around to the room and "handle the situation."

23. MOFFETT insinuated that he was a "middleman" for drugs between the females and the drug dealers. MOFFETT said that he could go to the drug dealers and get

more drugs than the females could for the same price because he was not a “junkie.”

MOFFETT stated that he would go get drugs for the females and give them half of it.

When they would come up to him later with no money and they were about to get sick,

MOFFETT would give them the other half of the drugs.

24. MOFFETT stated that he would loan the females money when he had it and they needed it. However, they would have to pay MOFFETT his money back off of what they made whenever he didn't have any money. MOFFETT said there are several females at the present time that owe him over \$2,000.00, and he never pressures them. When asked which females detectives should speak with that could verify his account, he said “everyone I am going to tell you about will be a Backpage girl.” MOFFETT then listed the names of ten females.

25. MOFFETT confirmed that his previous cell phone number was 330-962-0461 and that he had that number for the last five or six years.

26. MOFFETT confirmed that he was in fact from Cleveland, Ohio, and that he had taken people from Jacksonville, Florida, to Akron, Ohio, with him from the beginning of March to approximately the end of March or the beginning of April 2017 to see his family. MOFFETT stated that females with the initials K.B., K.W., a female named “Kelly,” and a male with the initials K.L. had traveled with MOFFETT to Ohio. MOFFETT said that “Kelly” took customers off of Backpage.com and that some detectives had come to the Red Roof Inn in Akron, Ohio, to investigate the activity, but nothing ever happened. MOFFETT said the rooms were rented in K.B.'s name. When asked which

rooms they were, MOFFETT said "I had two rooms." MOFFETT stated he had traveled to Akron in K.B.'s vehicle, which MOFFETT described as a "grey bubble Chevy." MOFFETT said that they were pulled over by state troopers in Ohio. MOFFETT said "they searched my vehicle for 4 hours." According to MOFFETT, they all were issued a citation for "the smell of marijuana."

27. MOFFETT confirmed that he had stayed at the Best Airport Inn located at 1077 Airport Road, Jacksonville, Florida, and that all of the females that he mentioned came from there. He said that at one point the hotel manager pulled him to the side and advised him to not get himself in trouble with the females. MOFFETT said that he was present at the Best Airport Inn when K.W. and S.A. (who he referred to by the correct first name, but using a similar-sounding last name) were arrested by the JSO Vice Unit for prostitution. MOFFETT advised that S.B. was present that day also. MOFFETT said that she and her "baby daddy" are the ones that got all of this started.

28. MOFFETT said that he never put his hands on the females. MOFFETT said that he found the best thing to do is cut them off, because once they get out there and see how things are, they will come back. MOFFETT said that if we checked the cameras at the Denny's, we would routinely see him with 7-10 females. According to MOFFETT, they all referred to themselves as a family.

29. According to MOFFETT, the process to post on Backpage.com is as follows: get an Amazon card with \$25.00; you need a room; you need condoms; you have to download two apps – Paxful and Bitcoin Wallet; you then get on the internet, take a picture

of the Amazon card and trade it on Paxful for bitcoins; once you get bitcoins, you send them to Backpage.com to place your ad. MOFFETT stated that the girls each set up a fake email account and most use a Wi-Fi number through “Textnow” or “Textfree” apps. They use these apps to talk to customers because the numbers are untraceable. MOFFETT stated that they also have an app called “Mr. Blocked Number” that helps them identify and vet out possible undercover police officers or bad customers.

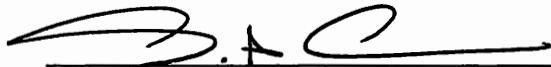
30. I am familiar with the website Backpage.com through my work with the JSO Vice Unit. Through that work, I know that Backpage.com is an internet website that is commonly used to advertise for prostitution. During the time periods relevant to this complaint, servers for Backpage.com were located outside of the State of Florida. As of early April 2018, Backpage.com has been seized by federal authorities, including the FBI and the U.S. Department of Justice’s Child Exploitation and Obscenity Section.

CONCLUSION

Based on the foregoing facts, I submit that there is probable cause to believe that from on or about April 10, 2017, through May 17, 2017, Richard Anthony MOFFETT did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit a person, that is S.A., while knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause S.A. to engage in a commercial sex act. These acts constitute violations of 18 U.S.C. § 1591.

This concludes my affidavit.

Respectfully submitted,



Scott Guess, Special Deputy U.S. Marshal
Federal Bureau of Investigation (FBI)
Jacksonville Child Exploitation Task Force

Subscribed and sworn to before me

On April 30th, 2018:



PATRICIA D. BARKSDALE
United States Magistrate Judge