

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

SAMUEL NICHOLS,
also known as "Buck," and
CHARLES FEARS,
also known as "Kash"

CASE NUMBER:

UNDER SEAL

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 2012, and continuing through in or about October 2014, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants violated:

Code Sections

Title 18, United States Code, Section
1591(a)

Offense Description

sex trafficking of Individual C by force, fraud, or coercion

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

HELEN DUNN

Special Agent, Federal Bureau of Investigation
(FBI)

Sworn to before me and signed in my presence.

Date: December 29, 2015

Judge's signature

City and state: Chicago, Illinois

GERALDINE SOAT BROWN, U.S. Magistrate Judge
Printed name and Title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Ss

AFFIDAVIT

I, HELEN DUNN, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, and have been so employed for 12 years. My current responsibilities include the investigation of violent crimes, including sex trafficking crimes and crimes against children.

2. This affidavit is submitted in support of a criminal complaint alleging that SAMUEL NICHOLS, also known as BUCK, and CHARLES FEARS, also known as KASH, have 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 NICHOLS and FEARS with sex trafficking of Individual C by force, fraud, or 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 defendants committed the offenses alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement officers, interviews of witnesses, cellular phone records, recorded jail calls, and records obtained from hotels and other sources.

I. SUMMARY

4. Beginning in or around September 2014, the FBI has been investigating allegations that SAMUEL NICHOLS, a/k/a “Buck,” and CHARLES FEARS, a/k/a “Kash,” engaged in the sex trafficking of minors or by force, fraud, and coercion in the Chicago area and elsewhere. The investigation has shown that, starting in or about 2012 and continuing through in or about October 2014, NICHOLS and FEARS trafficked Individual C by force, fraud, and coercion. The investigation has further shown that NICHOLS and FEARS trafficked other females through force, fraud, and coercion, including Minor A, and Individuals A, B, and D. As described below, Minor A was 13 years old when she was trafficked by NICHOLS and Individual B¹ was approximately 16 years old when she was trafficked by FEARS.

5. The investigation has shown that NICHOLS and FEARS worked together to recruit females and at times shared females in their sex trafficking operations. In addition, they used the same methods to engage in the commercial sex business. NICHOLS and FEARS primarily ran their sex trafficking operations out of motels, where NICHOLS, FEARS, and the females they trafficked lived for periods of times. NICHOLS and FEARS paid for motel rooms for the females they trafficked and instructed the females to perform sex acts in exchange for money in the motel rooms. In order to solicit customers for the females they trafficked, NICHOLS and FEARS posted and caused to be posted commercial sex

¹ Individual B was a minor at time of trafficking, but is now an adult.

advertisements on the website Backpage.com, that included photographs of the female wearing lingerie and/or posed in sexual positions and the female's contact phone number. NICHOLS and FEARS provided the females they trafficked with cellular telephones and instructed the females to answer calls from Backpage.com customers and then engage in commercial sex acts with these customers in exchange for money, which the females had to provide to NICHOLS and FEARS.

6. The investigation has further shown that NICHOLS and FEARS used force, fraud, and coercion against the females they trafficked. As described below, NICHOLS and FEARS intimidated, hit, slapped, and choked the females who worked for them in their sex trafficking business, including one incident in which NICHOLS beat Individual A so badly that she had to be hospitalized. In addition, the investigation has shown that NICHOLS and FEARS carried firearms as a part of their sex trafficking operations, including keeping firearms in the motels where they conducted their sex trafficking operations. Furthermore, NICHOLS and FEARS supplied the females who worked for them with drugs and alcohol to help them to engage in commercial sex trafficking activities.

II. FACTS SUPPORTING PROBABLE CAUSE

a. Background Information about NICHOLS and FEARS

7. As noted above, both NICHOLS and FEARS primarily ran their sex trafficking organization out of hotels in the greater Chicago area. As an example, Witness A, manager of the Motel 6 in Harvey, Illinois, was interviewed by law enforcement. Witness A identified a photograph of NICHOLS as SAMUEL

NICHOLS and also stated his nickname was “Buck.” Witness A also identified a photograph of FEARS as “Charles Spears” and stated he/she knew his nickname was “Kash.” Witness A stated that NICHOLS referred to FEARS as his son, and that they often were both staying at the hotel at the same time. Witness A stated that NICHOLS and FEARS frequently stayed at the Motel 6, paying for their rooms in cash, and typically had multiple females staying at the hotel with them.

8. As described below, multiple individuals interviewed by law enforcement have stated that NICHOLS and FEARS are part of an aspiring rap group called the “Hit Squad.” Witness A stated that NICHOLS and FEARS were members of the Hit Squad and wore distinctive Hit Squad shirts. Additionally, a number of the females trafficked by NICHOLS and/or FEARS, including Minor A and Individuals A, B, and C, told law enforcement that NICHOLS and FEARS were members of “Hit Squad.” Furthermore, I have reviewed music videos on YouTube that feature NICHOLS, FEARS, and other members of the “Hit Squad” rapping and making music together. I identified NICHOLS and FEARS in these videos based upon my prior review of law enforcement photographs of NICHOLS and FEARS.

b. NICHOLS and FEARS Trafficked Individual C By Force, Fraud, and Coercion from Approximately 2012 through Approximately 2014

9. On or about July 15, 2015, law enforcement arrested Individual C (date of birth xx/xx/1986) pursuant to state arrest warrants out of DuPage County,

Illinois, and Shelby County, Tennessee. Individual C agreed to be interviewed by the FBI.² I also conducted subsequent interviews of Individual C.³

10. Individual C told law enforcement that she worked as a commercial sex worker for both “Kash” and “Buck.” Individual C was shown a known photograph of FEARS, whom she identified as “Kash.” Individual C was also shown a known photograph of NICHOLS, whom she identified as SAMUEL NICHOLS, or “Buck.”

11. Individual C stated that she first met FEARS after he responded to one of her commercial sex advertisements on Backpage.com. Individual C stated that she was 25 years old at the time. After FEARS saw Individual C’s post on Backpage.com, FEARS called Individual C and told her that he wanted to be her “daddy,” meaning pimp. Individual C stated that she met FEARS at a Super 8 motel and began working for FEARS’s commercial sex business. Individual C stated that FEARS brought NICHOLS with him to this initial meeting at the Super 8 motel. According to Individual C, FEARS referred to NICHOLS as “pop.” Individual C stated that FEARS and NICHOLS had rooms at the Super 8 motel, and females who worked for FEARS and NICHOLS also were staying at that motel.

² Prior to any questioning, Individual C was provided with her *Miranda* rights, had them read to her, and signed a waiver of those rights.

³ Individual C has approximately two prior convictions for drug related offenses and charges related to a violent crime are currently pending against Individual C. No promises have been made to Individual C in exchange for her cooperation. Individual C has not been paid for her cooperation. Certain information provided by Individual C has been corroborated by the statements of other witnesses and/or records, as set forth herein.

12. Individual C stated that FEARS posted commercial sex advertisements for her on Backpage.com. Individual C stated that FEARS had several other females working for him in sex trafficking business at the Super 8 motel. Individual C stated that she only worked for FEARS for a couple of weeks before she left FEARS and began working for NICHOLS's commercial sex business. While working for FEARS, Individual C stated that she gave all of the money she earned in the commercial sex business to FEARS. Individual C further stated that FEARS spent most of his time hanging out with NICHOLS.

13. Individual C stated that she worked for NICHOLS on and off from approximately the summer of 2012 through approximately October of 2014. Individual C stated that NICHOLS ran his sex trafficking operation out of motel rooms, where NICHOLS and the females who worked for him would live for weeks at a time. Individual C stated that the motels included motels across the Chicago area and suburbs, from Lansing to Naperville, and she specifically recalled one of the motels that NICHOLS used for his commercial sex trafficking operation was the Red Roof Inn in Lansing, Illinois. Records obtained from hotels in the Chicago area as a part of the investigation show that NICHOLS reserved hotel rooms during this time period. For example, according to records obtained from hotels, NICHOLS rented hotel rooms in his name at the Extended Stay Hotel in Schaumburg, Illinois, on or about September 9, 2013; at the Extended Stay Hotel in Downers Grove, Illinois, on or about August 4-5, 2014, August 22-25, 2014, and September 1-4, 2014; at the Red Roof Inn in Downers Grove, Illinois on or about August 7-8, 2014; at the

Red Roof Inn in Joliet, Illinois, on or about August 26, 2014, and at the Days Inn in Alsip, Illinois on or about July 17, 2013.⁴

14. Individual C stated that NICHOLS had multiple females working for him in his commercial sex business at any given time. Individual C stated that NICHOLS used Backpage.com to advertise her and the other females who worked for NICHOLS. Specifically, Individual C stated that NICHOLS posted photographs of her on Backpage.com and used the alias “Becky” for her advertisements. Individual C assumed that NICHOLS paid the fee to Backpage.com for her advertisements.

15. Individual C stated that potential customers would respond to the Backpage.com advertisements by calling or texting her phone number to set up a “date.” Individual C stated that NICHOLS set the prices that she was required to charge for the commercial sex. The prices varied depending on the amount of time the client wanted. Once the price was agreed upon and the client arrived at the motel, Individual C stated that she would text NICHOLS to tell him that the client had arrived. After the client’s session was over, Individual C stated that she would

⁴ Moreover, a police report also indicates that NICHOLS was present at the Red Roof Inn in Lansing, Illinois. More specifically, according to a Lansing Police Department report, on or about August 26, 2014, Lansing Police officers were dispatched to the Red Roof Inn in Lansing, Illinois, related to allegations that, in the parking lot of the hotel, NICHOLS hit Individual E and stole money from her. As set forth below in paragraph 17, the investigation has revealed that Individual E worked for NICHOLS in his sex trafficking operation. The Lansing report indicates that officers spoke with Individual E at the Red Roof Inn, but were unable to make contact with NICHOLS and the report states that no further investigation was required.

text NICHOLS again to let him know and NICHOLS would come to the motel room and take the money that Individual C received from the customer.

16. Individual C stated that she had to give all of the money she earned in the commercial sex trafficking business to NICHOLS. On a busy day, Individual C stated that she serviced 10 to 20 commercial sex customers and made as much as \$1,000, all of which she gave to NICHOLS. Individual C stated that she worked every day at any time a customer called and Individual C did not get to sleep at regular hours. Individual C stated that NICHOLS provided her and other females who worked for him with drugs and alcohol, including cocaine, crack cocaine, marijuana, and ecstasy. Individual C stated that using drugs and alcohol made it easier to cope with working in the commercial sex business. NICHOLS gave her cocaine and crack cocaine, which she used in order to feel better and give herself more energy to engage in the commercial sex business.

17. Individual C stated that NICHOLS had multiple females working for him at any given time. Individual C stated that Individual E had been working for NICHOLS's commercial sex business longer than the other females and it was Individual E's responsibility to supervise the other females who worked for NICHOLS. Individual C stated that if a new girl working for NICHOLS broke NICHOLS's rules, then NICHOLS would "take it out on," meaning beat up, Individual E. Individual C stated that she observed NICHOLS beat Individual E, drag Individual E across a room, and smack Individual E and yell at her. Individual C stated that she and the other females who worked for NICHOLS liked

Individual E and did not want to see her get hurt, so they tried not to break NICHOLS's rules.

18. According to Cook County Jail call records, in approximately May 2013, NICHOLS was incarcerated in the Cook County Jail, and during that time period, made a number of calls to females involved in his commercial sex trafficking operation which were recorded (and the users were notified of such recording). These telephone calls corroborate the information that Individual C provided about Individual E and other females who worked for NICHOLS⁵:

a. For example, on or about May 13, 2013, NICHOLS had multiple conversations with Individual I (date of birth xx/xx/1989), a female who worked for him in his commercial sex trafficking business. During these calls, NICHOLS discussed making money in his sex trafficking business, and discussed a female leaving his sex trafficking business and beating Individual I as a result. Specifically, NICHOLS stated, "Don't be thinking that I'm trying to get out on you or nothing like that . . . [Individual E] makes the most money though and that's what we need, money . . . when I get enough bitches, you is not even gonna be around you, I promise . . . But I can't do nothin' if you keep runnin' bitches away that's why I said I'm gonna beat your ass, you cannot run [Individual E] away."

⁵ The transcripts of the conversations described in this affidavit remain in draft form; to the extent quotations from the conversations are included, they are preliminary, not final. The summary of the recorded conversations described in this affidavit do not include all potentially criminal statements or topics covered during the course of the conversations described herein.

b. In another recorded call between NICHOLS and Individual I on or about that same day, NICHOLS stated, "I told your ugly ass she was going to leave, stupid bitch . . . if I could spend time with my bitch, bitch, because you two stupid bitches, if I could spend time with her then she wouldn't go nowhere . . . Can't no nigga take no bitch from me, is you stupid, you retarded . . . That's just somebody else for her to go to because I ain't paying her ass no attention, the same way Kash [FEARS] couldn't because he wasn't here . . . You all just lost a whole good bitch, ya'll two bitches, no watcha ya'll gonna do, ya'll finna go get me another bitch . . . You retarded bitch, you always demanding attention though . . . I been fucking with you for six years" NICHOLS further told Individual I that she "better be apologizing" and "sucking dick." NICHOLS ended the conversation with Individual I by warning her to watch her tone of voice and instructed her to get his "bitch back."

19. Individual C further told law enforcement that she knew if she did not follow NICHOLS's rules, NICHOLS would hit her. Individual C stated that NICHOLS was violent towards her on approximately six different occasions. For example, Individual C stated that the last time NICHOLS put his "hands on" her was in approximately fall of 2014 when they were working out of the Red Roof Inn in Lansing. Individual C stated that NICHOLS got mad at her because she asked a commercial sex trafficking client to bring her cigarettes. When NICHOLS found the cigarettes, he slapped Individual C for not listening to him. According to Individual

C, NICHOLS slapped her twice on the side of the face, which caused her ear to bleed.

20. Individual C stated, on another occasion, when Individual C was approximately 25 years old, NICHOLS slapped Individual C in a room at the Red Roof Inn in Lansing, Illinois. At that time, NICHOLS was operating his sex trafficking operation out of the Red Roof Inn in Lansing. NICHOLS slapped Individual C repeatedly because NICHOLS found out that Individual C had been exchanging text messages with FEARS. Individual C stated that FEARS was present in the room when NICHOLS slapped her. In addition, Individual C stated that other females who worked for NICHOLS were present, including Individual E and Individual G. Individual C stated that she had a bruise on her cheekbone area as a result of NICHOLS slapping her.

21. Individual C described another incident of NICHOLS being violent toward her which occurred in 2012, soon after Individual C started working for NICHOLS. During this incident, which Individual C stated occurred at the Red Roof Inn in Lansing, Individual C was intoxicated and was mad at NICHOLS for not spending enough time with her and the other females who worked for him. Individual C stated that NICHOLS told the other females to leave the room, and at that point, Individual C stated that she passed out. According to Individual C, when she woke up, she was lodged between the sink and the safe in the motel and room and her face was swollen and she had a black eye and a split lip.

22. In addition, Individual C provided information to law enforcement regarding minors who worked for NICHOLS's sex trafficking operation. Specifically, Individual C stated that Individual G (date of birth x/xx/1995) was another one of NICHOLS' "girls," meaning she worked in commercial sex trafficking for NICHOLS. Individual C told law enforcement that she thought Individual G looked young, but Individual G told Individual C that she was 18. According to Individual C, NICHOLS later told her that Individual G was under 18. Similarly, Individual C stated that Individual H (date of birth xx/xx/1996) was another female who worked for NICHOLS' commercial sex trafficking business. Individual C stated that Individual H looked young. Individual C stated that NICHOLS told her that Individual H worked for NICHOLS while she was underage.

23. Individual C stated that, on one occasion, NICHOLS took Individual C and several other females who worked for him to Minnesota. Individual C stated that they stayed in Minnesota for approximately three days in the area of the Mall of America. Individual C stated that NICHOLS posted her and the other females on Backpage.com for commercial sex acts while they were in Minnesota.

24. Individual C stated that she saw NICHOLS with guns on a few occasions. For example, Individual C stated that, on the way home from the trip to Minnesota, Individual C was in the car with NICHOLS and NICHOLS stopped somewhere to pick up a gun, and drugs for Individual C. Individual C recalled that the gun was a .22 caliber gun with a long clip on it. Individual C further stated

that, at times, NICHOLS kept a gun under a mattress in the hotel room where they were staying for his sex trafficking business.

25. Individual C stated that NICHOLS and FEARS were members of a rap group called the “Hit Squad.” Individual C stated that she frequently saw NICHOLS and FEARS wearing Hit Squad t-shirts. Furthermore, Individual C identified NICHOLS and FEARS in a photograph in which they each were wearing Hit Squad t-shirts.

c. Other Females Trafficked by NICHOLS & FEARS

26. In addition to Individual C, law enforcement has interviewed multiple other females who were trafficked by NICHOLS and FEARS and, as set forth below, the information they provided was consistent with that provided by Individual C. Furthermore, as described below, law enforcement has gathered records, including hotel and phone records, which further corroborate Individual C and show that NICHOLS and FEARS engaged in the sex trafficking of minors and by force, fraud, and coercion.

i. NICHOLS Trafficked Minor A, a 13 Year Old, by Force, Fraud and Coercion From Approximately July through September 2014

27. On or about September 26, 2014, Downers Grove police officers were contacted by management at the Extended Stay Hotel located in Downers Grove, regarding suspected sex trafficking in room number 329 at the hotel. According to the Downers Grove police officers, upon arriving at the third floor of the Extended Stay Hotel on September 26, 2014, officers observed Individual A (date of birth

xx/xx/1991) and Minor A (date of birth xx/xx/2000) in the hallway outside of Room 329. The officers stated that they recognized Individual A from photographs in advertisements for commercial sex acts over the website Backpage.com.

28. According to Downers Grove police reports, Individual A agreed to speak with the officers and allowed the officers to enter Room 329. Minor A followed Individual A into Room 329. The officers further stated that, while in the hotel room, Individual A confirmed that she had posted online advertisements for commercial sex. Minor A denied posting commercial sex ads, but admitted to smoking part of a marijuana cigarette that was present inside the room.

29. According to the Downers Grove officers, Minor A gave officers verbal consent to search her cell phone. During a preliminary search after this consent, officers located recent text messages to and from Minor A asking about Minor A's willingness to perform certain specific sexual acts in exchange for money. The officers seized the cellular telephones that were in the possession of Minor A and Individual A. I later obtained a federal warrant from a Magistrate Judge to search both of the cell phones that were seized on September 26, 2014. Text messages and photographs downloaded from both of the phones indicated that the phones were being used in furtherance of sex trafficking, as described below.

30. According to Downers Grove officers, Minor A provided the officers with an alias (her mother's name), and they arrested her on an outstanding warrant and transported her to DuPage County Jail. Minor A was charged (again, under her mother's name) with possession of cannabis, prostitution, and obstructing

justice. Officers conducted an inquiry on Minor A's fingerprints and determined that Minor A's fingerprints were associated with an adult wanted subject. Officers later learned that the adult wanted subject was in fact Minor A's mother, whose identity Minor A had falsely used during a criminal trespass to vehicle related arrest in July 2014. After Minor A's true identity was discovered, Minor A was transported to the Cook County Juvenile Detention Center located in Chicago.

31. Before Minor A was transported to Cook County, Minor A made several phone calls at DuPage County Jail which were recorded (and the users were notified of such recording) and overheard by a DuPage County Sheriff. In one call, Minor A was overheard speaking to a male whom Minor A later identified as NICHOLS. During this call, NICHOLS made explicit statements to Minor A about the sexual acts she was going to need to perform based on the fact that he was going to have to pay to have her bonded out of jail. For example, when Minor A asked NICHOLS not to leave her in jail, NICHOLS responded with words to the effect of: "You'll be out in an hour, you better be ready to suck some dick and rub some feet when you get out bitch, (for) putting me back." Minor A replied, "I'm ready to suck some pubic hair too, come on Buck, get me out of here." NICHOLS replied, "Whatever, I'll be there." Minor A stated, "All right."

32. I first interviewed Minor A at the Cook County Juvenile Detention Center on or about October 3, 2014. Subsequently, I interviewed Minor A on

multiple occasions.⁶ During these interviews, Minor A provided information about her history with NICHOLS and her involvement in NICHOLS's commercial sex business, as summarized in part below. Minor A was shown a photograph of NICHOLS and identified NICHOLS as SAMUEL NICHOLS, and stated that NICHOLS is also known as "Buck." Minor A referred to NICHOLS as "Buck" throughout the interviews.

33. Minor A told law enforcement that she first met NICHOLS in approximately June of 2014, after she had run away from home. At that time, Minor A was 13 years old and wore metal braces on her teeth. Minor A stated that NICHOLS approached her about working as a stripper at a night club, and Minor A decided to work as a stripper. According to Minor A, she told NICHOLS that she was 23 years old but had lost her ID card. NICHOLS then obtained an ID for Minor A that had the name and photograph of another female. After working as a stripper for a short period of time, in or about July 2014, Minor A began working in the commercial sex business for NICHOLS.

34. Minor A stated that NICHOLS posted pictures of someone who looked like her on Backpage.com to advertise Minor A's commercial sex services. Minor A stated that one of the aliases that NICHOLS used for the sex ads was "Chelsea." The ads stated that Minor A was 23, when Minor A was actually 13 at the time.

⁶ Minor A has a conviction for retail theft and there are currently charges pending against Minor A related to aggravated battery. No promises have been made to Minor A in exchange for her cooperation. Minor A has not been paid for her cooperation. Certain information provided by Minor A has been corroborated by the statements of other witnesses and/or records, as set forth herein.

35. Minor A stated that NICHOLS provided her with a cell phone to use for phone calls and text messages related to commercial sex. Minor A provided information about the rates that she charged for different sex acts and how much money she was required to turn over to NICHOLS. Minor A explained that NICHOLS controlled the rates to be charged for different sex acts. The rates varied according to time of sexual encounter and the location. For example, NICHOLS required Minor A to charge customers (“Johns”) in Lansing, Illinois, \$60 for 15 minutes of sexual activity. Minor A stated that she was required to turn over the full rate of \$60 to NICHOLS. If a customer paid Minor A more than NICHOLS’s set rate, Minor A was permitted to keep the amount above the set rate.

36. Minor A stated that she worked for NICHOLS from approximately July 2014 through approximately the time of Minor A’s arrest in late September 2014. During that time period, Minor A saw that NICHOLS had approximately two or three other females working for him in his sex trafficking business at a time. According to Minor A, NICHOLS ran his commercial sex trafficking business out of hotel rooms in the Chicago area, such as the Red Roof Inn in Lansing, Illinois, and the Extended Stay Hotel in Downers Grove, Illinois. As noted above, records obtained from Chicago-area hotels as part of the investigation show that NICHOLS rented a number of hotel rooms in his name during this time period.

37. Minor A told law enforcement that NICHOLS paid for the hotel rooms and assigned each female a bed to work from. Minor A stated that she worked for

NICHOLS in his sex trafficking business almost every day and sometimes all day and all night.

38. Minor A stated that NICHOLS paid for cigarettes and food for the females who worked for him. Minor A stated that NICHOLS also paid for the females to get their nails and hair done.

39. Minor A recalled one time when she got into an argument with NICHOLS and NICHOLS hit Minor A in the face, causing her lip to become swollen. More specifically, Minor A stated that NICHOLS and Minor A were in a hotel room at the Red Roof Inn in Lansing, Illinois, when NICHOLS yelled at her and Minor A yelled back at him. Minor A stated that, when she yelled back, NICHOLS hit her hard in the face. Minor A stated that her lip got stuck in her braces when NICHOLS hit her, which caused her lip to bleed and to become swollen. Minor A further stated that, after he hit her, NICHOLS told her that she better not talk back again.

40. Minor A also provided information about Individual A. Minor A stated that, according to what she learned from Individual A, Individual A had been working for NICHOLS's commercial sex business for over a year. Minor A stated that Individual A told her that NICHOLS had been violent towards Individual A before, and on one occasion hit Individual A in the head with a phone, leaving a small gash on Individual A's head.

41. Minor A stated that she also observed NICHOLS choke Individual E on several occasions. Minor A explained that, according to what she had learned

from Individual E, Individual E had worked for NICHOLS' commercial sex business for years and had a child with NICHOLS.

42. Minor A identified a photograph of FEARS as a person who Minor A knew by the name "Kash." Minor A stated that FEARS was a pimp. Minor A stated that she never worked for FEARS, but she knew a female who worked for FEARS in FEARS's commercial sex trafficking business. Minor A further explained that NICHOLS and FEARS were close friends and that NICHOLS treated FEARS like a son. According to Minor A, FEARS sometimes stayed at the same hotel as NICHOLS and Minor A when Minor A was working for NICHOLS' commercial sex business. Minor A stated that NICHOLS at times gave money to FEARS in order to pay for hotel rooms for his commercial sex trafficking business or to buy items for the females who worked for FEARS.

43. Minor A stated that she knew NICHOLS and FEARS to be members of a rap group called the "Hit Squad." Minor A stated that, in addition to rapping, the members of the Hit Squad pimped females and sold drugs.

44. Minor A confirmed that the phone law enforcement seized from her on or about September 26, 2014, was a phone that NICHOLS had given her to use in his commercial sex trafficking business (the "Minor A Phone"). Minor A stated that she used Minor A Phone to communicate with NICHOLS and Backpage.com customers.

45. On or about October 3, 2014, a Magistrate Judge issued a search warrant authorizing the search of the Minor A Phone. Law enforcement subsequently searched the Minor A Phone, which revealed the following:

a. Minor A had the phone number 708-xxx-9262 (“NICHOLS Phone 1”) saved in the Minor A Phone under the contact name “Buck.”

b. The Minor A Phone contained text messages between Minor A and NICHOLS Phone 1 regarding NICHOLS’s sex trafficking business. For example, on or about September 26, 2014, Minor A sent a text message to the NICHOLS Phone 1 that stated, “Got one.” Upon review of this text message, Minor A confirmed that this was a text message that she sent to NICHOLS to let him know that she had a commercial sex customer. Minor A stated that it was her practice to send a text message such as this one to NICHOLS when she had a commercial sex customer.

c. The Minor A Phone also contained a number of text messages that appeared to be text messages between Minor A and customers arranging for sex and negotiating a price for sex. For example, a text message received on the Minor A Phone dated September 26, 2014 stated, “Hi saw your ad on Backpage . . . wondering if ur available for outcall \$300 full hr.” Another received text message from the same date stated, “Quickie . . . How much.” In addition, another text message received on the same date asked, “U do anal too?” And another text message received on the Minor A Phone stated, “Hi are you available tonight in lisle around midnight?” Furthermore, Minor A confirmed to law enforcement that the

Minor A Phone contained text messages with customers related to the commercial sex trafficking business.

d. Also, according to records obtained from the service provider of the Minor A Phone, between on or about September 23, 2014 and on or about September 27, 2014, there were approximately 64 contacts between the Minor A Phone and NICHOLS Phone 1.

ii. NICHOLS and FEARS Trafficked Individual A by Force, Fraud and Coercion From Approximately mid-2012 through approximately 2014

46. On or about February 11, 2015, Lansing Police Department officers conducted an undercover commercial sex operation involving Individual A at the United Motel located in Lansing, Illinois. According to Lansing Police reports and information obtained from Lansing Police Department Officers, prior to this operation taking place, officers located a posting on Backpage.com entitled “Bella’s back and ready to play 60\$ special – 21,” Post ID 25884766. After locating this advertisement, an officer acting in an undercover capacity (hereafter referred to as UC), contacted “Bella” by calling the telephone number listed on the Backpage posting. Once at the United Motel, the UC called the telephone number and was advised by “Bella” to come to room number 245. The UC located Room 245, knocked on the door, and “Bella” answered the door and invited the UC inside of the room. Once inside, the UC and “Bella” discussed the price for different sex acts. After negotiating a \$60 fee in exchange for sexual intercourse, the UC attempted to hand \$60 in cash to “Bella” and “Bella” told the UC to set the money on the table. “Bella”

then told the UC to get comfortable and to start taking off his clothes. At that time, the UC arrested “Bella.”

47. According to information provided by Lansing Police Department Officers, once “Bella” was taken into custody, she was processed and positively identified as Individual A. The officers learned that Individual A had two outstanding warrants, and she was transported to DuPage County Jail.⁷

48. On or about February 20, 2015, Individual A was interviewed by FBI agents at the DuPage County Jail.⁸ Since her arrest, Individual A has agreed to participate in additional interviews with law enforcement. During these interviews, Individual A provided information about her history with NICHOLS and FEARS and her involvement in NICHOLS’s and FEARS’s commercial sex business, as summarized in part below. Individual A was shown a photograph of NICHOLS and identified NICHOLS as SAMUEL NICHOLS, and stated that NICHOLS is also known as “Buck.” Individual A was shown a photograph of FEARS and identified FEARS as “Kash” (Individual A did not know “Kash’s” true name).

49. According to Individual A, she moved to Chicago in approximately May 2012 and met NICHOLS shortly after she moved to Chicago. Individual A exchanged phone numbers with NICHOLS and thereafter began working for

⁷ Individual A has prior convictions including convictions related to drug offenses and assault. No promises have been made to Individual A in exchange for her cooperation. Individual A has not been paid for her cooperation. Certain information provided by Individual A has been corroborated by the statements of other witnesses and/or records, as set forth herein.

⁸ Prior to any questioning, Individual A was provided with her *Miranda* rights, had them read to her, and signed a waiver of those rights.

NICHOLS. Individual A stated that NICHOLS convinced her to work for him by making promises to Individual A, such as promising Individual A that he could get her a house and a car, which never occurred.

50. Individual A stated that NICHOLS posted advertisements for Individual A on Backpage.com. Specifically, Individual A stated that she typically took her own photographs to be used in the Backpage.com advertisements. Individual A stated that she would send the photographs to NICHOLS and he would use the photographs and write the description for the Backpage post. According to Individual A, after NICHOLS submitted the post to Backpage.com, NICHOLS would send a text message to Individual A's cell phone notifying her that he just posted so she should get ready and answer her cell phone when the customers called. Individual A stated that NICHOLS typically posted a sex advertisement for her on Backpage.com around 5:00 a.m., for the customers who are on their way to work, and then again around 12:00 p.m. Individual A stated that NICHOLS used various aliases for Individual A's advertisements on Backpage.com, including "Ashley," "Becky," "Jessica," "Jennifer," "Samantha," and "Amanda." Individual A stated that sometimes Individual E, another female who worked for NICHOLS's commercial sex business, would post advertisements on Backpage.com for Individual A at NICHOLS's direction. When Individual A had a customer, Individual A would send a text message to NICHOLS to let him know.

51. Individual A stated that she was required to turn over all of the money that she was paid for the commercial sex acts to NICHOLS.

52. Individual A stated that NICHOLS supplied her with drugs so that she could stay up for long periods of time and continue to prostitute herself for NICHOLS's sex trafficking business. According to Individual A, NICHOLS initially supplied her with cocaine and later provided her with "molly," which Individual A described as a pure form of ecstasy.

53. Individual A further stated that NICHOLS was physically abusive towards her and other females who worked for his commercial sex business. Individual A recalled one particularly bad beating that she believes occurred during the summer of 2014. Individual A stated that NICHOLS observed her talking to FEARS and NICHOLS became enraged and beat Individual A so severely that she was hospitalized. Individual A stated that NICHOLS punched her multiple times, and hit her repeatedly with a wooden hanger. Individual A stated that NICHOLS also threw a cell phone at her head, creating a cut on her head and causing her head to bleed. When Individual A was to be released from hospital, Individual A called FEARS to come and get her. According to Individual A, FEARS sent another individual to pick up Individual A, who Individual A identified as Individual F. Individual F drove Individual A from the hospital to the Red Roof Inn in Lansing, Illinois, where NICHOLS was located. Individual A stated that NICHOLS permitted her to take approximately one week off of working as a commercial sex worker to recover from the beating.

54. Hospital records corroborate Individual A's statements about NICHOLS beating her. Specifically, the records reflect that Individual A was

admitted to the hospital on April 9, 2014 at approximately 1:32 a.m. with injuries consistent with the injuries Individual A described to law enforcement.

55. According to Individual A, while she was recuperating from the beating, Minor A, another female working for NICHOLS' commercial sex business, came to stay in the same hotel room with Individual A at the Red Roof Inn. Individual A stated that NICHOLS instructed Individual A to train Minor A on how to post on Backpage.com. Individual A stated that she was aware of NICHOLS slapping Minor A on an occasion when Minor A talked back to NICHOLS. Individual A further stated that, at some point when Minor A was being prostituted by NICHOLS, NICHOLS mentioned to Individual A that he was taking Minor A and another girl to school. Individual A stated that she understood that Minor A was a minor. Individual A further stated that NICHOLS bragged about having young girls working for him.

56. Individual A stated that NICHOLS also beat her if she did something wrong, such as not putting on makeup before a "date" or missing phone calls from potential customers. For example, Individual A stated that, on occasions when she missed a lot of calls from customers, NICHOLS would kick Individual A to the floor, smack Individual A into a wall, or beat her.

57. Individual A stated that NICHOLS nicknamed her "Molly." During the course of this investigation, I have interviewed other females who worked for NICHOLS who have identified a known photograph of Individual A as "Molly." I have also reviewed Backpage.com advertisements that contain photographs of

Individual A, and have observed that the name “Molly” is tattooed on Individual A’s lower back.

58. Individual A also has a tattoo on her right arm that reads “Lady Buck.” According to Individual A, she got the “Lady Buck” tattoo at the request of NICHOLS. Individual A explained that NICHOLS wanted the girls who worked for him to have his nickname tattooed on them in order to designate that they were property of NICHOLS.

59. Individual A stated that NICHOLS took her to a number of different cities in the Chicago area to work in NICHOLS’s commercial sex trafficking business, including Lansing, Alsip, Downers Grove, and Joliet. NICHOLS would run his sex trafficking business out of hotels in these areas, including the Red Roof Inn in Lansing, Illinois, the Extended Stay hotel, and the Motel 6. Indeed, records obtained from various hotels in the Chicago area show that Individual A booked hotel rooms in her name during this time period. For example, a hotel room was booked in Individual A’s name at the Days Inn in Alsip, Illinois on or about August 5-6, 2013, and at the Red Roof Inn in Lansing, Illinois on or about January 6-12, 2014, February 25, 2014, March 1, 2014, and March 10, 2014. Additionally, as noted above, hotel records also show that NICHOLS rented a hotel room in his name at the Days Inn in Alsip, Illinois on or about July 17, 2013.

60. The statements of Witness A, manager of the Motel 6 in Harvey, Illinois, further corroborate Individual A’s statements. As noted above, Witness A was interviewed by law enforcement and identified NICHOLS and FEARS in

photographs shown to him/her by law enforcement. As noted above, Witness A stated that NICHOLS and FEARS frequently stayed at the Motel 6, paying for their rooms in cash, and typically had multiple other females staying at the hotel with them. Witness A also identified a photograph of Individual A, identifying Individual A by first and last name, and explained that Individual A was one of the females that was often with NICHOLS and FEARS. Witness A stated that he/she saw Individual A with NICHOLS at the Motel 6 on multiple occasions, including a couple of times when he/she saw NICHOLS and Individual A walking together, and Individual A was crying.

61. Individual A further told law enforcement that, at some point in approximately 2014, NICHOLS took Individual A to Atlanta, Georgia, to engage in commercial sex acts. Individual A stated that they went to Atlanta, Georgia, with FEARS and two other females who worked for NICHOLS and one female who worked for FEARS in the sex trafficking business. While in Atlanta, Individual A stated that NICHOLS posted her and the two other females to Backpage.com so that they could engage in the commercial sex acts in Atlanta for NICHOLS.

62. Individual A stated that NICHOLS had multiple guns. Individual A stated that NICHOLS typically kept two guns in the safe in Individual A's hotel room and also kept guns at the homes of the mothers of his children, including Individual E. Individual A stated that FEARS, like NICHOLS, is a "pimp." Individual A stated she "worked" (engaged in commercial sex trafficking for FEARS) for FEARS at certain times, namely, when Individual A got upset with

NICHOLS for beating her, or when NICHOLS was incarcerated. Individual A stated that she knew of FEARS being violent toward one of the females who worked for him in sex trafficking business. Individual A stated that FEARS gave this female a black eye after she yelled at FEARS.

63. Furthermore, Individual A told law enforcement that NICHOLS and FEARS are members of an aspiring rap group called "Hit Squad." Individual A stated the Hit Squad is unorganized and is essentially a group of rappers who hustle any way they can. Individual A stated that Individual F is another member of the Hit Squad. Individual A stated that Individual G is a rapper and a member of the Hit Squad who started rapping at approximately 13 years old. Individual A stated that she was told by both NICHOLS and Individual G that Individual G started working in the commercial sex business for NICHOLS when she was approximately 16 years old.

64. As described above, when Individual A was arrested on or about September 26, 2014, law enforcement seized a cellular phone from Individual A and obtained a federal warrant issued by a Magistrate Judge to search this cellular phone ("Individual A Phone 1"). When Individual A was arrested on or about February 11, 2015, law enforcement seized another cellular phone from Individual A ("Individual A Phone 2"), and again obtained a federal warrant issued by a Magistrate Judge to search this phone. Law enforcement has searched Individual A Phone 1 and Individual A Phone 2 pursuant to the above-described search warrant, and those searches revealed the following:

a. On Individual A Phone 1, the phone number (708) xxx-9262 (NICHOLS Phone 1) was saved in the contacts under the name "My mr." As set forth above, this was the same telephone number that Minor A had saved in her phone under the name "Buck." In addition, a review of the text messages exchanged between Individual A Phone 1 and "My mr" indicate that "My mr" was NICHOLS. For example, similar to Minor A, Individual A sent a text message to "My mr" on or about September 24, 2014, that stated, "Got one." Individual A also sent a text to "My mr" that stated, "Done." In addition, on or about September 25, 2014, Individual A sent a text to "My mr" asking when he would post her to Backpage.com: "What time are u gonna post mr." Another text message that Individual A sent to "Mr mr" on or about September 25, 2014, stated, "I'm hungry mr."

b. Individual A Phone 1 contained a number of text messages that appeared to be text messages between Individual A and customers arranging for sex and negotiating a price for sex. For example, a text message was received by Individual A Phone 1 that stated, in part, "Hey Jessica! I saw your post and was wondering if you'd be available later tonight?" Another text message was received by the Individual A Phone 1 on or about September 25, 2014, that stated, "Yes and would u mind sending a pic so I know who I'm gonna be meeting and to make sure ur not the police." On or about September 25, 2014, Individual A sent a text message from the Individual A Phone 1 that provided her rate to a potential customer: "Qwk 60 hh 100." Based upon my training and experience and

knowledge of the facts and circumstances of the investigation, in this text message, Individual A told a potential customer that the “quick” rate, or rate for 15 minutes, was \$60 and that a half hour was \$100.

c. Records obtained from the service provider of Individual A Phone 1 indicate that, between on or about September 22, 2014 and September 26, 2014, there were approximately 19 contacts between Individual A Phone 1 and NICHOLS Phone 1.

d. On Individual A Phone 2, law enforcement’s search revealed that Individual A had three telephone numbers saved under the contact name “Buck.” A review of the call records from the Individual A Phone 2 indicated that, on or about October 26, 2014, Individual A made seven outgoing calls and three outgoing texts to one of three “Buck” telephone numbers. Based upon the call records on the Individual A Phone 2, there were no contacts between Individual A and the two other “Buck” telephone numbers.

e. Also on Individual A Phone 2, two phone numbers, (708) xxx-3206 and (708) xxx-6235, were saved in the contacts under the name “KASH \$\$. ” A review of call records revealed that, on or about October 26, 2014, there were approximately 2 outgoing calls from Individual A Phone 2 to the KASH \$\$ 6235 number. Call records further revealed that, from on or about December 11, 2014, through February 19, 2015, there were approximately 121 text messages exchanged between Individual Phone A Phone 2 and the KASH \$\$ 3206 number. Law enforcement’s review of those text messages indicated that the language used the

text messages was consistent with the language used in the commercial sex business. For example, on or about January 5, 2015, Individual A Phone 2 sent a text to KASH \$\$ at the 3206 number that stated, “Ok do u have a post,” and KASH \$\$ responded, “Nope, I posted 1 time and they shit riggin.” On or about January 18, 2015, Individual A Phone 2 sent a text message to KASH \$\$ that stated, “Gotta do a few things but Im be in my room today mostly working.”

iii. FEARS Trafficked Individual B, Who Was 16 Years Old, by Force, Fraud and Coercion From Approximately 2013 Through Approximately 2014

65. On or about January 29, 2015, Alsip police officers arrested Individual B (date of birth xx/xx/1995) on an active warrant for armed robbery. The FBI was notified of the arrest and two FBI agents immediately went to the Alsip Police Department to interview Individual B.⁹ In or about May 2015 and June 2015, I conducted additional interviews of Individual B with her attorney’s permission.¹⁰

66. Individual B told law enforcement that she worked as a commercial sex worker for “Kash,” and identified “Kash” as her pimp. Individual B was shown a photograph of FEARS and identified FEARS as “Kash.” Individual B stated that she knew FEARS’s first name to be “Charles,” but did not know his last name. Individual B was shown a photograph of NICHOLS and identified NICHOLS as

⁹ Prior to any questioning, Individual B was provided with her *Miranda* rights, had them read to her, and signed a waiver of those rights.

¹⁰ Individual B has prior convictions for armed robbery and assault and is currently in custody serving a sentence. No promises have been made to Individual B in exchange for her cooperation. Individual B has not been paid for her cooperation. Certain information provided by Individual B has been corroborated by the statements of other witnesses and/or records, as set forth herein.

“Buck,” and did not know his true name. Individual B stated that FEARS refers to NICHOLS as “pops” and NICHOLS refers to FEARS as “son.” Individual B further stated that she knows NICHOLS and FEARS to be members of a rap group called the “Hit Squad.”

67. Individual B stated that she met FEARS when she was approximately 16 years old. Individual B stated that about a month after she met FEARS, she met FEARS’s friend, NICHOLS. NICHOLS asked Individual B to work as a prostitute for him in his commercial sex trafficking business at the Red Roof Inn in Lansing, Illinois. According to Individual B, NICHOLS told her that he had his own “business” (the commercial sex trafficking business) and that one of Individual B’s friends, Individual H (date of birth xx/xx/1996), had been working for NICHOLS since she was 14 years old.

68. Individual B stated that, after she met NICHOLS, she went to the Red Roof Inn in Lansing and got her own room, but was not interested in working for NICHOLS. Once at the Red Roof Inn, Individual B stated that she told NICHOLS to get his “son” FEARS from the Motel 6 and to bring him over to the Red Roof Inn. According to Individual B, once FEARS came over to the Red Roof Inn, Individual B began working as a prostitute for FEARS in his commercial sex trafficking business. Individual B was 16 years old at this time. Individual B stated that FEARS knew that she was 16 years old because, in the presence of Individual B, NICHOLS told FEARS that Individual B was 16 years old.

69. Individual B stated that FEARS had other females who worked for his sex trafficking business. Individual B explained that FEARS kept “his girls” away from each other. As a result, Individual B rarely interacted with the other females who worked for FEARS in his sex trafficking business.

70. Individual B stated that FEARS taught her about the commercial sex business, including how to post advertisements on Backpage.com. Specifically, FEARS took photographs of Individual B in lingerie, bra and panties, or a short dress. Individual B stated that she would pose in sexual positions for the photographs that FEARS used for the Backpage.com advertisements. Individual B stated that FEARS never used her real name for the advertisements; instead, FEARS used aliases such as “Honeybun,” “Angel,” “Bentley,” and “Sadora.” Individual B stated that FEARS typically posted an advertisement for her on Backpage.com early in the morning because many customers would then call Individual B’s cell phone to arrange for sex on their way to work between 4:00 a.m. and 7:00 a.m. Individual B stated that FEARS would typically post another advertisement for her on Backpage.com around lunch time. On a busy day, Individual B stated that she would see approximately 40 to 50 customers in one day.

71. Individual B stated that she took the drug ecstasy to help her stay awake all night to work in the commercial sex trafficking business. Individual B stated that FEARS used the money that Individual B earned from working in his sex trafficking business to buy ecstasy pills for Individual B. Individual B stated

that FEARS also supplied drugs to other females who worked for his commercial sex trafficking business.

72. Individual B stated that FEARS also taught her how to answer calls from potential customers, and what to say to the customers on the phone and during the date. Individual B stated that she usually had a hotel room with FEARS and that FEARS would leave the room when a customer arrived for a “date.” Individual B stated that she also sometimes shared a room with other females who worked for FEARS.

73. Individual B stated that FEARS physically abused her on several occasions, and typically in front of other girls who worked for FEARS. The first time FEARS was violent toward Individual B occurred at the Red Roof Inn in Lansing. During this occasion, Individual B stated that FEARS stomped on her finger, which scared Individual B. After FEARS hurt Individual B’s finger, FEARS required that Individual B continue working for him. According to Individual B, there were other times that FEARS got angry with her and took her into the hotel bathroom where he shoved her head into the toilet and flushed the toilet. Individual B also reported that FEARS used his belt to hit her in front of other people in the hotel room. Individual B also explained that FEARS choked her, and that on more than one occasion FEARS choked her to the point that she blacked out. Individual B further stated FEARS forced her to have sex with him on multiple occasions and refused to wear a condom.

74. Individual B stated that FEARS supplied her with condoms to use with customers. In addition, Individual B stated that FEARS bought body wash and soap for Individual B and FEARS's other girls to use. FEARS bought Individual B a cell phone and paid the monthly bills for the phone.

75. Individual B stated FEARS carried a gun, which Individual B believed to be a revolver. Individual B stated that FEARS usually kept the gun inside of the safe in the hotel room where he stayed while running his sex trafficking business.

76. Individual B stated that NICHOLS and FEARS each had their own set of females who worked for them in the sex trafficking business. Individual B stated that she witnessed NICHOLS use violence toward the females who worked for him, as FEARS did with her. Individual B stated that, on one incident that occurred at the Red Roof Inn, Individual B saw NICHOLS with a gun and NICHOLS fired approximately three shots at Individual I, one of the females who worked for him. On other occasions, Individual B observed NICHOLS slap two separate females who worked for him. Individual B stated that she saw some females who worked for NICHOLS with black eyes.

77. Individual B stated that she worked for FEARS in FEARS's commercial sex trafficking business for approximately a year and a half. After she left FEARS, FEARS continued to contact her over social media. According to Individual B, she had not spoken with FEARS since her arrest in January 2015. Individual B stated that, since her arrest, she at times talked to Individual H, who

told Individual B that FEARS continued to work in the sex trafficking business out of hotels in South Holland, Illinois.

iv. **NICHOLS and FEARS Trafficked Individual D by Force, Fraud, and Coercion for Approximately 18 Months Beginning in 2012**

78. In or about August 2015, law enforcement conducted two interviews of Individual D (date of birth xx/xx/1990) about her past experiences working for FEARS's and NICHOLS's sex trafficking business. Individual D was shown a known photograph of FEARS, whom she identified as "Charles Fierce" also known to her as "Kash." Individual D was also shown a known photograph of NICHOLS, whom she identified as "Buck." Individual D stated that "Buck's" first name was Samuel but she did not know his last name.¹¹

79. Individual D stated that she met FEARS in approximately 2012, while she was working at a strip club. Individual D stated that FEARS was hanging out at the strip club with NICHOLS. According to Individual D, FEARS told Individual D that he wanted her to come work him, stating that he would take care of Individual D and help her save her money. Individual D gave FEARS her phone number. Individual D stated that, the next day, FEARS and NICHOLS picked her up from her relative's house and drove her to the Red Roof Inn in Lansing, Illinois, where FEARS and NICHOLS were living at the time.

¹¹ Individual D has no prior felony convictions. No promises have been made to Individual D in exchange for her cooperation. Individual D has not been paid for her cooperation. Certain information provided by Individual D has been corroborated by the statements of other witnesses and/or records, as set forth herein.

80. Individual D stated that FEARS told her about his commercial sex business. Specifically, FEARS instructed Individual D that if she did not earn at least \$300 per day working at the strip club, FEARS would post a commercial sex advertisement for her on Backpage.com and Individual D would be required to earn additional money by engaging in commercial sex acts. Individual D stated that FEARS took photographs of her wearing lingerie and other sexy clothes to post on Backpage.com and gave her a cell phone to use to answer the calls from customers after the Backpage.com advertisement was posted. Individual D stated that FEARS used aliases for her such as “Honey” on the Backpage.com advertisements.

81. According to Individual D, FEARS also told her that his “girls” (the women who worked for his sex trafficking business) had to call him “daddy” because he was like a father and we were not allowed to do anything without his permission.

82. Individual D stated that FEARS told her how much she was required to charge for commercial sex and that the prices were set by the amount of time spent with a customer. Individual D was required to notify FEARS, usually by text message, after scheduling a “date” with a customer. Individual D would also text FEARS after the customer’s session was over. Then FEARS would come to the motel room and collect all of the money that Individual D received from the customer. Individual D stated that, on a slow day, she serviced approximately four or five customers, and on a busy day, serviced eight or more customers.

83. Individual D stated that she met with clients at hotel rooms, such as the Red Roof Inn in Lansing, Illinois, and the Extended Stay hotel in Downs Grove,

Illinois. According to records from the Extended Stay hotel in Downers Grove, Illinois, Individual D rented a room in her name on March 20, 2013.

84. Individual D stated that FEARS did not hit her, but that she observed FEARS slap another female who worked for him in the face.

85. After Individual D had been working for FEARS in his commercial sex trafficking business for approximately one year, FEARS was arrested at the Downers Grove Extended Stay hotel. According to Individual D, after FEARS was arrested, the females working for NICHOLS came to her room at the hotel and sat with her. Individual D stated that, for a little while after FEARS was arrested, Individual D worked for herself, but NICHOLS was always around. At some point, Individual D stated that NICHOLS approached her and told her that he had spoken with FEARS on the phone and that FEARS told NICHOLS he wanted NICHOLS to take care of Individual D while FEARS was locked up. According to Individual D, NICHOLS convinced Individual D that she needed someone to take care of her and demanded that she work for him.

86. Individual D stated that she worked for NICHOLS's commercial sex business for approximately five or six months. Individual D stated that she had to give all of the money she earned in the sex trafficking business to NICHOLS. Individual D observed NICHOLS beat and choke Individual G. Individual D described NICHOLS as an aggressive person and stated that she was afraid he would beat her if she misbehaved.

87. Individual D stated that NICHOLS supplied Individual D and other females who worked for him with alcohol and marijuana. In addition, Individual D stated that NICHOLS supplied Individual D and the other females who worked for him with condoms to use in the sex trafficking business.

Background Regarding NICHOLS and FEARS

88. NICHOLS has been in custody since approximately late October 2014. More specifically, on or about October 28, 2014, NICHOLS was arrested on an outstanding warrant issued by Will County, Illinois, for domestic battery against Individual E and was sentenced to one year imprisonment. After serving that sentence, NICHOLS was extradited to Tennessee to face aggravated kidnapping charges related to allegations that he kidnapped a baby from Individual E after a violent altercation with Individual E. NICHOLS currently remains in custody in Tennessee pending the outcome of those charges.

89. The investigation has shown that FEARS may be continuing to engage in the commercial sex business in the Chicago area and Northern Indiana. For example, on or about August 26, 2015, FEARS was detained by law enforcement in Merrillville, Indiana, on suspicion of promoting prostitution. More specifically, according to Lake County (Indiana) Police Department reports, an undercover officer in Lake County, Indiana, contacted a telephone number listed on a Backpage.com posting advertising commercial sex acts with "Malina." The undercover officer set up a date to engage in commercial sex acts with "Malina," who said that she was staying in room 248 at the Motel 6. According to the Lake

County report, the undercover officer went to room 248 at the Motel 6, where he met “Malina.” In addition, according to the report, law enforcement officers also observed FEARS at the Motel 6 in the vicinity of room 248. FEARS and the female using the name “Malina” were detained for further investigation, but were not charged in connection with this incident. According to records obtained from Backpage.com, the advertisement for “Malina” described above was posted to Backpage.com by email address hsgeb3@gmail.com, an email address which may be associated with FEARS.¹² Furthermore, Backpage.com records reflect that, from in or about December 1, 2014 through September 9, 2015, hsgeb3@gmail.com posted approximately 133 advertisements to Backpage.com.

¹² Records from Google reflect that the email address hsgeb3@gmail.com is registered to user “Hitsquad Muzikk.”

NICHOLS and FEARS's Conduct Affected Interstate Commerce

90. As described above, NICHOLS and FEARS's conduct with regard to their sex trafficking operations affected interstate commerce in that they used cellular phones, the Backpage.com website, and national hotel chains, such as the Red Roof Inn, Motel 6, Days Inn, and Extended Stay hotels, in furtherance of their sex trafficking operations.

FURTHER AFFIANT SAYETH NOT.

HELEN DUNN
Special Agent, Federal Bureau of
Investigation

SUBSCRIBED AND SWORN to before me on December 29, 2015.

GERALDINE SOAT BROWN
United States Magistrate Judge

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

SAMUEL NICHOLS,
also known as “Buck” and
CHARLES FEARS,
also known as “Kash”

CASE NUMBER:

UNDER SEAL

**GOVERNMENT'S MOTION TO SEAL
COMPLAINT, AFFIDAVIT, AND ARREST WARRANTS**

Now comes the UNITED STATES OF AMERICA, by ZACHARY T. FARDON,
United States Attorney for the Northern District of Illinois, and states as follows in
support of its Motion to Seal Complaint, Affidavit, and Arrest Warrants:

The public filing of the Complaint, Affidavit, and Arrest Warrants in this
matter before the arrest warrants can be executed could alert the defendants and
result in their flight and the destruction of evidence.

For this reason, the government respectfully requests that the Complaint, Affidavit, and Arrest Warrants, as well as this Motion to Seal, be sealed until the time of arrest of all defendants in this case or further order of the Court, whichever occurs earlier.

DATE: December 29, 2015

Respectfully submitted,

ZACHARY T. FARDON
United States Attorney

By: _____

Sarah Streicker
Assistant United States Attorney
219 S. Dearborn Street, Rm. 500
Chicago, Illinois 60604
(312) 353-1415

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

SAMUEL NICHOLS,
also known as "Buck" and
CHARLES FEARS,
also known as "Kash"

CASE NUMBER:

UNDER SEAL

ORDER

The UNITED STATES OF AMERICA by its attorney, ZACHARY T. FARDON, United States Attorney for the Northern District of Illinois, having moved this Court to Seal the Complaint, Affidavit, Arrest Warrants, and Motion to Seal, and having demonstrated good cause in support of its motion,

IT IS HEREBY ORDERED THAT the Complaint, Affidavit, Arrest Warrants, and Motion to Seal be sealed until the time of arrest of all defendants in this case or further order of the Court, whichever occurs earlier. This Order does not prohibit law enforcement personnel from disclosing the Complaint, Affidavit, and Arrest Warrant as necessary to facilitate the enforcement of criminal law, including the execution of the warrant, or to any federal official to assist the official receiving the information in the performance of that official's duties.

ENTER:

GERALDINE SOAT BROWN
United States Magistrate Judge

DATE: December 29, 2015