

UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States of America
v.Hakeeme Kaleb Williams
(Year of birth 1999)

Case No. 24MJ878

Defendant(s)

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(s) of June 15-17, 2024 in the county of Bernalillo in the
 District of New Mexico, the defendant(s) violated:*Code Section*

18 U.S.C. § 2421(a)

Offense Description

Transportation for the Purpose of Prostitution

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.*Complainant's signature*

Daniel Fondse, FBI Special Agent

Printed name and title

Sworn to me telephonically and signed electronically.

Date: 06/18/2024*Judge's signature*City and state: Albuquerque, New Mexico

Hon. John F. Robbenhaar, U.S. Magistrate Judge

Printed name and title

Affidavit

1. I, Special Agent Daniel Fondse, your Affiant, am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since May 2017. As such, I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request arrest warrants. Prior to my employment by the FBI, I spent three years as a sworn law enforcement officer in the city of San Diego. I am currently assigned to the FBI’s Albuquerque Division Child Exploitation and Human Trafficking Task Force, as such, I am authorized to investigate crimes involving Human Trafficking. I have received training from other law enforcement officers in the investigation and enforcement of federal Human Trafficking laws. I have also received training and gained experience in interview techniques, arrest procedures, search warrant applications, the execution of searches and seizures, computer evidence identification, computer evidence seizure and processing, and various other criminal laws and procedures. I have previously participated in Human Trafficking investigations and search warrants.
2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement officers and witnesses. Because this affidavit is submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish that probable cause to support a criminal complaint against Hakeeme Kaleb Williams, year of

birth 1999, herein referred to as HAKEEME for a violation of 18 U.S.C. § 2421(a),
Transportation for the Purpose of Prostitution.

Relevant Statutes

3. Title 18 U.S.C. § 2421(a) - Whoever knowingly transports any individual in interstate or foreign commerce, or in any Territory or Possession of the United States, with intent that such individual engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, or attempts to do so, shall be fined under this title or imprisoned not more than 10 years, or both.

Details of the Investigation

4. On June 17, 2024, an adult female, JANE DOE1,¹ called 911 and was connected to the Bernalillo County Sheriff's Office. JANE DOE1 reported that she was being trafficked and provided information so that law enforcement officer could respond to her location. Based on her location and the information provided to emergency dispatchers, officers of the Laguna Police Department located JANE DOE1 outside of a white car bearing Florida License plate RAIF89 parked at the gas pumps of Laguna 66 Pit Stop, I-40 Exit 114, Laguna, NM 87026. Officers also contacted HAKEEME and another adult female, JANE DOE2, inside the white car.

5. JANE DOE1 stated she had been earning money as a sex worker and that HAKEEME was her pimp. JANE DOE1 said she met HAKEEME over Facebook. Shortly after they met in person, JANE DOE1 agreed to give HAKEEME one week as her pimp.

HAKEEME had JANE DOE1 work in an area of Phoenix, AZ known for prostitution,

¹ The full name and identities of JANE DOE1 and JANE DOE2 are known to law enforcement but anonymized here to protect their privacy in compliance with 18 U.S.C. § 3773, as well as to protect the ongoing investigation.

commonly referred to as the “Blade.” JANE DOE1 gave the money she earned from sex work to HAKEEME. When JANE DOE1 started her relationship with HAKEEME, he was just ending a relationship with JANE DOE2.

6. JANE DOE1 stated it was difficult to make money in Phoenix. She posted an advertisement in Florida, and received responses. Florida was too far, so she posted an advertisement in El Paso, Texas and it received responses. HAKEEME then drove JANE DOE1 to El Paso so that JANE DOE1 could participate in sex work in El Paso. HAKEEME transported them using a silver Chevrolet Tahoe, which HAKEEME had purchased. While they were in El Paso, HAKEEME was involved in an incident with the police. He was waiting outside in a vehicle while JANE DOE1 prepared to meet a customer. The police contacted HAKEEME in the vehicle and determined he was in possession of an unholstered firearm. JANE DOE1 said that because of this incident, HAKEEME was unable to purchase another firearm. A law enforcement records check showed HAKEEME was contacted by the El Paso Police Department on August 11, 2023, and charged with unlawful carrying of a weapon, corroborating JANE DOE1’s statement.
7. JANE DOE1 stated that from El Paso, they returned to Phoenix, then traveled to Florida so JANE DOE1 could participate in sex work. On the way to Florida, HAKEEME drove JANE DOE1 to Colorado, where she participated in sex work. While in Colorado, HAKEEME arranged for another female to fly from New York and join them. They then drove to Florida, stopping in Tennessee. In Florida, JANE DOE1 participated in sex work.

8. While in Florida, JANE DOE1 left HAKEEME and returned to Phoenix. After about ten days, JANE DOE1 returned to Florida and continued sex work without HAKEEME, who had had left for Baltimore, Maryland. When HAKEEME found out JANE DOE1 was back in Florida, HAKEEME returned to Florida. He communicated with JANE DOE1 as though he was a customer. When JANE DOE1 went outside to meet who she thought was a customer, HAKEEME came up to her from behind wearing a black ski mask. HAKEEME later told JANE DOE1 she had a “deer in the headlight” look on her face. JANE DOE1 later agreed to go back to work for HAKEEME.
9. JANE DOE1 said HAKEEME frequently hit JANE DOE1 in the face when he was angry. JANE DOE1 described the earliest memory of HAKEEME hitting her. JANE DOE1 borrowed HAKEEME’s car to go to the store. She moved HAKEEME’s gun from the car to her room. JANE DOE1 had trouble remembering where she put the gun in her room and HAKEEME reacted by hitting JANE DOE1. HAKEEME would hit JANE DOE1 over minor incidents, such as if she would roll her eyes. About a month ago, HAKEEME was angry at JANE DOE1 and struck her on the upper thigh with a belt, causing a visible bruise.
10. JANE DOE1 said that about a month ago, HAKEEME and JANE DOE1 were in Florida, where they were joined by JANE DOE2. They were driving back from Florida, stopping in cities along the way. HAKEEME drove the white car, which he had purchased in Florida. Every night, both JANE DOE1 and JANE DOE2 would attempt sex work. On or about June 16, 2024, they stayed at a Marriott in Albuquerque, NM. JANE DOE1 saw several clients. In the early morning hours of June 17, 2024, JANE DOE1 was woken by HAKEEME hitting her in the face. HAKEEME had read messages on JANE DOE1’s

phone from a customer. HAKEEME accused JANE DOE1 of participating in an unauthorized act with a client.

11. JANE DOE1 said she was recently using her CashApp account and it showed she had sent HAKEEME \$23,000 over the past year. JANE DOE1 said she often has her clients pay HAKEEME directly using CashApp or similar methods.

12. An online search using a phone number provided by JANE DOE1 identified a recently posted advertisement in Albuquerque which was consistent with sex work. The photographs in the advertisement appeared to be JANE DOE1.

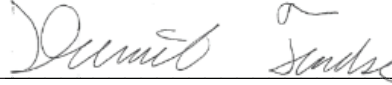
13. JANE DOE2 also stated she has participated in sex work. JANE DOE2 stated she and JANE DOE1 were recently driven from Florida to Albuquerque by HAKEEME. They departed from Miami, FL, with stops in Atlanta, Huntsville, New Orleans, and Houston. In each city, JANE DOE1 and JANE DOE2 posted advertisements on websites frequently used for sex work, including Mega and Skip the Games. JANE DOE2 denied giving her earnings to HAKEEME, claiming that she works freelance.

14. A search using a phone number provided by JANE DOE2 identified an advertisement posted on June 11, 2024, in Albuquerque, which was consistent with sex work. The photographs in the advertisement appeared to be JANE DOE2.

15. In summary, I have probable cause to believe that HAKEEME has committed a violation of 18 U.S.C. § 2421(b), Transportation for the Purpose of Prostitution, by transporting JANE DOE1 across interstate lines to Albuquerque, NM, for the purposes of engaging in prostitution.

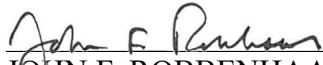
16. Prosecution of Hakeeme Williams was approved by Assistant United States Attorney Sarah Mease.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

A handwritten signature in cursive script, appearing to read "Daniel Fondse", written over a horizontal line.

Daniel Fondse, Special Agent
Federal Bureau of Investigation

Subscribed electronically and sworn to me this
18th day of June, 2024.

A handwritten signature in cursive script, appearing to read "John F. Robbenhaar", written over a horizontal line.

JOHN F. ROBBENHAAR
UNITED STATES MAGISTRATE JUDGE