

UNITED STATES DISTRICT COURT

for the

District of Rhode Island

United States of America)

v.)

DUJUAN HARRIS)

D.O.B.: 1980)

PROVIDENCE, RHODE ISLAND)

Defendant

1:15-MJ-270-PAS

Case No.

2015 AUG 19 P 1:29

U.S. DISTRICT COURT
DISTRICT OF RHODE ISLAND

CRIMINAL COMPLAINT

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

On or about the date of _____ in the county of _____ in the _____ District of

Rhode Island, the defendant violated 18 U. S. C. § 1591a1, a2, b1, b2, an offense described as follows:

- 18 U.S.C. § 2423a;
- 18 U.S.C. § 2251a, and e;
- 18 U.S.C. § 2252a4B and b2

For sex trafficking of a child in violation of 18 U.S.C. § 1591(a)(1), (a)(2), (b)(1) &(b)(2); transportation of a minor with intent to engage in criminal sexual activity in violation of 18 U.S.C. § 2423(a); production of child pornography in violation of 18 U.S.C. § 2251(a) and (e); and possession of child pornography in violation of 18 U.S.C § 2252(a)(4)(B) and (b)(2).

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Rachel Robinson, Homeland Security Investigations

Continued on the attached sheet.

R Robinson

Complainant's signature

Rachel Robinson, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: Aug 19, 2015

City and state: Providence, Rhode Island

Patricia A. Sullivan

Judge's signature

PATRICIA A. SULLIVAN U.S. MAGISTRATE

Printed name and title

AFFIDAVIT

I, RACHEL ROBINSON, being duly sworn, hereby depose and state as follows:

1. I am a Special Agent with Homeland Security Investigations and have been since May, 2007. As a HSI agent, I executed numerous arrest, search, and seizure warrants in cases involving human trafficking, human smuggling, intellectual property rights violations, child exploitation, narcotics and money laundering offenses. I have participated in investigations including those involving human trafficking and those involving child exploitation and, among other things, have conducted or participated in surveillances, the execution of search and arrest warrants, debriefings of informants, reviews of recorded conversations and monitoring court ordered wire intercepts. I am currently assigned to conduct investigations in the Resident Agent in Charge (RAC) Providence Office of HSI. I have prepared numerous affidavits in support of applications for federal search and arrest warrants. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

2. My duties include the enforcement of federal criminal laws, including Sex Trafficking of Children violations, including but not limited to, knowingly, in or affecting interstate or foreign commerce recruits, enticing, harboring, transporting, providing, obtaining, or maintaining by any means a person; knowingly, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause a person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, under Title 18 of the United States Code section 1591.

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

4. This affidavit is submitted in support of an arrest warrant and criminal complaint against Dajuan HARRIS, (DOB: 1980), of Providence, Rhode Island, for sex trafficking of a child in violation of 18 U.S.C. § 1591(a)(1), (a)(2), (b)(1) &(b)(2) and transportation of a minor with intent to engage in criminal sexual activity in violation of 18 U.S.C. § 2423(a), production of child pornography in violation of 18 U.S.C. 2251(a) and (e) and possession of child pornography in violation of 18 U.S.C § 2252 (a)(4)(B) and (b)(2).

5. On June 25, 2015, members of the Providence Police Department, Youth Services Bureau met with B. Smith, who reported his 17 year old daughter (herein referred to as VICTIM) missing as she had run away from her home in Texas. Smith stated his daughter attempted to travel to Providence, RI in April 2015. The VICTIM'S mother reported her missing at that time and she was apprehended by law enforcement in Virginia and returned to the custody of the VICTIM's mother.

6. Smith stated the VICTIM developed a relationship on the internet with an adult male residing in Providence, RI identified as Dajuan HARRIS (DOB: 1980). HARRIS sent money to the VICTIM to run away in April and again over the weekend in June 2015.

7. Smith stated that he learned that the VICTIM had traveled to Providence, Rhode Island to be with HARRIS from conversations via text message with the VICTIM. Smith traveled from Texas to Rhode Island to attempt to locate VICTIM. Smith reported to Providence Police Department Detective Rawnsley that the VICTIM'S ATM card had been used in the Washington Park Area at some businesses.

8. On June 29, 2015, an Administrative Summons was served to Backpage.com requesting information associated with (401) 481-7127, Providence Posting 4889194, which was the account associated with the ads on Backpage.com. That same day the following was received: Backpage.com Providence Posting ID 4889194 was posted on Saturday, June 20, 2015, at 11:05 PM bearing the title "kandy is tasty - 20." The advertisement read as follows: "Hey guys, come relax with me at my place. My name is Kandy, 401 209 5645.. No texting please. Call only. I aim to please.don't Tex call..im very cute long black hair..in calls only.my kandy is sweet and taste please be polite when u call. In calls only...I'm 5 feet tall, clean feet and nails done. Hair is extra long down to the crack of booty. . .my body is amazing..seriously individuals only....." The poster's age lists: "20." The location lists: "Providence, rhodeisland." The Post ID lists: "4889194, Providence." The advertisement was posted by an account under the name "veronicasanders999@gmail.com," and email veronicasanders999@gmail.com. This advertisement contains a photograph of the VICTIM. The photograph depicts her face, torso, buttox and thigh area on her hands and knees on top of a bed. In this photograph, the VICTIM is wearing black sunglasses. Another photograph depicts the VICTIM standing against a wall wearing a black bra and thong, displaying her buttocks and

thigh area. According to the Backpage.com records, this advertisement was created on June 18, 2015, at 7:54 PM, renewed on June 19, 2015, at 2:12 PM, June 20, 2015, at 5:42 PM and June 20, 2015, at 11:05 PM. The same clothing, shoes, and accessories that the VICTIM was wearing in the backpage photographs was recovered from the Washington St. apartment.

9. On June 30, 2015, HSI Providence and Providence Police Department, members of the Human Trafficking Task Force located the VICTIM at 228 Washington St, 2nd Floor, Room #5, Providence, RI. The VICTIM was in the presence of HARRIS.

10. After an initial interview with the VICTIM at the residence, she stated that HARRIS took the battery out of her phone so she could not be located. At that time, law enforcement asked HARRIS for the VICTIM'S cellular phone battery, HARRIS proceeded to pull the battery from his pants pocket.

11. After further interview of the VICTIM, she stated she began corresponding with HARRIS on Instagram before travelling to Boston via Greyhound bus and arrived on June 12, 2015. The VICTIM stated that HARRIS met the VICTIM in Boston. Video obtained from the South Station Bus Terminal in Boston for June 14, 2015, shows that the Defendant met with HARRIS at this location. A Greyhound bus ticket for travel departing on June 12, 2015, from Austin, Texas, to Boston, Massachusetts was also found in the Washington St. apartment. The VICTIM stated that they took the Peter Pan bus to Providence, RI. Two Bonanza bus lines tickets for travel on June 14, 2015, from Boston, Massachusetts to Providence, RI, were also found in the Washington St. apartment. The names on the Bonanza bus line tickets was for "Veronica Sanders," and

“Dajuan Bishop.” Once they arrived in Rhode Island, she and HARRIS stayed at 72 Mawney St., Apt. 16, Providence, RI with HARRIS’s friend “David.” A few days after arriving in Rhode Island, HARRIS told the VICTIM they needed to “raise money.” HARRIS took photographs of her at 72 Mawney St. and posted her photographs on www.backpage.com. The phone calls began to come in almost immediately. The VICTIM answered the calls and HARRIS instructed her on what to say. The VICTIM stated that they did 6 “incalls” and charged \$150 for 30 minutes for full service, which she explained as vaginal sex. HARRIS would stay in the bathroom during the “incalls.” The VICTIM stated that HARRIS kicked the last “john” out because he wanted to stay longer than the 30 minutes. The VICTIM made \$1,000.00 from the “incalls” and would give all the money to HARRIS. The “incalls” all took place at 72 Mawney St, Apt 16, Providence, RI. HARRIS told the VICTIM he wanted to make \$4,000.00, however she told him she did not want to continue. The VICTIM stated that they subsequently moved to 228 Washington Ave., Room #5. The VICTIM further stated that HARRIS took the battery out of her cellular phone so that she could not be located. The VICTIM stated she attempted to leave several times, however HARRIS refused to let her go. The VICTIM explained that HARRIS was mad because she texted her father and that her father was in Rhode Island. The VICTIM stated that HARRIS pushed her on the floor, grabbed her by the back of the neck saying she didn’t care he could go to jail, and would physically block her when she tried to leave. The VICTIM also stated that HARRIS told her she would get arrested if they were found and that she shouldn’t still be breathing for trying to text her dad. She stated HARRIS checked her dad’s facebook,

called her dad an "a**hole," and made comments on how he should extort \$20,000.00 from her father for her release.

12. HARRIS was interviewed by Detective Koren Garcia at the Providence Police Department. HARRIS was advised of his Miranda rights, signed the rights form indicating that he understood his rights, and agreed to speak with law enforcement. HARRIS stated that the VICTIM was 17. HARRIS denied taking any pictures of the VICTIM or having any knowledge of advertisements or sex acts for money. HARRIS was subsequently charged in the Rhode Island District Court with Trafficking of a Minor under Rhode Island law.

13. After receiving consent by the VICTIM and her father, a search for the cellular phone belonging to the VICTIM, was conducted by the Providence Police Department. Text messages were found between the VICTIM and her father, in which the VICTIM requested money to be deposited into her bank account. In the text messages, the VICTIM stated to her father she rented an apartment with her money in Rhode Island. In a text message from the VICTIM to her father, she stated "ok n ur ok right? not calling police right."

14. On July 2, 2015, a state search warrant was authorized for HARRIS' cellular phone and resulted in the following discoveries: (1) Google Maps searches: (a) of street view displays of the VICTIM's residence in Texas and neighborhood; (b) for places in Texas including the Austin Greyhound Station in Austin, La Quinta Inn on Parker Drive, La Quinta Inn in Round Rock, and Lakeline Mall in Cedar Park; (c) for Easy Money Pawn Brokers, Cranston, RI; (2) Youtube search for "18 year old of gurl disguise

them self to look older;" (3) Numerous photographs of the VICTIM'S residence in Texas, to include zoomed in shots of the front door and view of the street; (4) A photograph of an envelope displaying the VICTIM's name and address, also depicting the work "Skype" in the upper corner and a view of HARRIS wearing a red bandana in the bottom left corner; (5) Instant messages from dmoneystackin1 to the VICTIM on April 25, 2015 stating the following: "you mad a statement in League City when u cam back;" "U mad a statement Im going to jail;" "Im going to jail for life;" "you made a statement on me so like I have a life time sentence over my head;" "you put daddy away for life;" (6) Conversations via text message that appear to be in response to the Backpage.com ad beginning on June 18, 2015, at 8:30 pm to June 19, 2015, at 8:35 a.m. inquiring about rates and requesting sexual services; (7) Image of a search for "Pandering and Permitting Prostitution;" (8) Web history include the following searched items: "Providence guideline in a runaway teen," "if a gurl 17 years old abd runs away from r.I. wear do she go," "National Runaway Safline Bulletin Boards," "Providence missing teen," "Providence man hunt for a man and missing teen," "How to protect yourself from Unethical or Illegal Spying," "Can someone trace all the calls, text Msgs, social app Msgs from my phone? Incase yes then how," "What does CNA mean for crime," "What does CNA mean for disposition of a criminal charge," "How do I change my check in location on facebook, "why u log in on face book does it show ur location," "Can you track phone apps or no;" and (8) Facebook searches for the VICTIM's father and aunt.

15. Numerous nude photographs of the VICTIM were observed on the phone belonging to HARRIS, some of which appear to be in a tan bedroom with almost yellow walls with vaulted ceilings and in a brown tiled bathroom shower. There are approximately 20 images that depict the VICTIM's genital areas, to include the following: (1) photograph depicting the VICTIM laying on her back, holding her legs in air, bent at the knee, displaying her vaginal area. The Skype logo is displayed in the upper right corner of the image; (2) photograph depicting the VICTIM wearing a black shirt, on her hand and knees, displaying her anal and vaginal area. The VICTIM's face is depicted in the image. The Skype logo is displayed in the upper right corner of the image; and (3) photograph depicting the VICTIM wearing a black shirt, on her hand and knees, displaying her anal and vaginal area. The VICTIM's face is depicted in the image looking back towards the camera. The Skype logo is displayed in the upper right corner of the image.

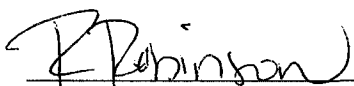
16. On July 3, 2015, Providence Police Department Detectives responded to 72 Mawney St., Apt.16, Providence, RI and identified Angel David Calderon as the tenant living at this address. Calderon consented to a search of his apartment and pointed out the air mattress that Dujuan and "his girl" had left behind. The interior of the apartment resembled the background of the photographs that the VICTIM stated were taken of her at this address and that were posted at www.backpage.com. Calderon agreed to go with the detectives to Central Station in Providence to provide a formal statement. After being advised of his rights and signing a rights form, Calderon stated that he knew Dujuan as "D" and had known him for approximately three years.

Calderon stated that he saw Dujuan at a mutual friend's house and that Dujuan had a girl with him that he introduced as a girlfriend. Dujuan told him that the girl was 22 or 24, but Calderon thought she looked like she was 16 or 17. Dujuan asked if he and his girl could stay with Calderon and offered him \$100 for the week. Calderon agreed that they could stay that night until the following Sunday.

17. On July 5, 2015, Detective Garcia went to 342 Elmwood Ave. and spoke with the owner of New Way Supermaket, Manuel Dejesus. Dejesus was shown photographs of Harris and the VICTIM. Dejesus remembered seeing them both in the store about the two weeks prior. Dejesus stated that HARRIS had purchased candy, soda, and two boxes of Magnum condoms. Dejesus that HARRIS came back the following day by himself and purchased another box of Magnum condoms.

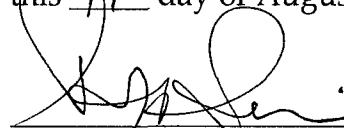
18. On July 29, 2015, Detective Garcia spoke with the VICTIM via telephone. The VICTIM stated that she and HARRIS had multiple social media accounts on Instagram, KIK and Skype that they used to communicate. The VICTIM stated that HARRIS has asked for proof of her age and that she sent him a picture of her birth certificate, by her iPhone via text or via Skype. HARRIS asked her to prove where she lived and she sent him a picture of an envelope with her address. HARRIS told her he had people in the area, one from Georgetown that would come by her house to make sure she didn't have a boyfriend or any guys coming over. The VICTIM told Detective Koren that HARRIS' guys would come by the VICTIM's house in a black Escalade and a black Dodge Charger. The VICTIM described HARRIS' guys as light skinned males. She also stated that HARRIS'S guys would take pictures of her house and her coming

and going. The VICTIM stated that when she and HARRIS began communicating in November 2014, he offered to have one of the guys come get her to assist her in getting to Providence but she refused. In approximately December 2014, HARRIS began asking for her to remove clothing and pose for him while they were talking on Skype. The VICTIM stated that she removed her clothes at his direction and posed for him both in her bedroom and in the bathroom. The VICTIM described her bedroom as a tan, almost yellow looking walls with vaulted ceilings, and that it had a white door and a small closet near her TV. The VICTIM described her bathroom as having the same color walls as her bedroom with brown tiles in the shower, light brown tiles on the floor, and dark wood cabinets. The VICTIM was at first unaware he was photographing her, however it was just before she had come to Providence that he told her he was taking pictures. HARRIS brought up the idea of her coming to Providence again in February after she had moved to her mom's house.



RACHEL ROBINSON
Special Agent
Department of Homeland Security

Subscribed and sworn to before me
at Providence, Rhode Island
this 19th day of August, 2015.



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