

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☐ INDICTMENT ☒ COMPLAINTCASE NO. 1-15 MJ 90AMatter Sealed: ☐ Juvenile ☐ Other than Juvenile☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added  
☐ Indictment ☐ Charges/Counts Added  
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND  
DISTRICT OF RHODE ISLAND Divisional OfficeName and Office of Person  
Furnishing Information on  
THIS FORMPETER F. NERONHA☒ U.S. Atty ☐ Other U.S. Agency  
Phone No. \_\_\_\_\_Name of Asst.  
U.S. Attorney  
(if assigned)PAMELA E. CHIN

## PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)  
Homeland Security Investigations☐ person is awaiting trial in another Federal or State Court  
(give name of court)☐ this person/proceeding transferred from another district  
per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges  
previously dismissed which were  
dismissed on motion of:☐ U.S. Atty ☐ Defense☐ this prosecution relates to a  
pending case involving this same  
defendant. (Notice of Related  
Case must still be filed with the  
Clerk.)☐ prior proceedings or appearance(s)  
before U.S. Magistrate Judge  
regarding this defendant were  
recorded underSHOW  
DOCKET NO.MAG. JUDGE  
CASE NO.Place of  
offense RHODE ISLAND

County

USA vs.

Defendant: MACKENZY SCOTT, a/k/a Bangzza/k/a Mackenzy Chandler Scott, a/k/a Banks

Ad:

Bi  
Di**REDACTED**Alien  
pplicable)

Si

Issu

Location Status:

Arrest Date \_\_\_\_\_ or Date Transferred to Federal Custody \_\_\_\_\_

☐ Currently in Federal Custody☒ Currently in State Custody STATE OF MASSACHUSETTS☒ Writ Required☐ Currently on bond☐ Fugitive

Defense Counsel (if any): \_\_\_\_\_

☐ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☐ This report amends AO 257 previously submitted

## OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 4

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	18 U.S.C. §§ 1591(a)(1) and (b)(1)	Sex trafficking of a child	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	18 U.S.C. § 1594(c)	Conspiracy to commit sex trafficking of a child	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	18 U.S.C. § 2423(a)	Trans. of a minor w/intent to engage in sexual activity	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	18 U.S.C. § 2423(e)	Conspiracy to transport a minor w/intent to engage in	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		criminal sexual activity.	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

## DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☐ INDICTMENT ☒ COMPLAINT

CASE NO.

1:15 MJ 91 AMatter Sealed: ☐ Juvenile ☐ Other than Juvenile☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added  
☐ Indictment ☐ Charges/Counts Added  
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND  
DISTRICT OF RHODE ISLAND Divisional OfficeName and Office of Person  
Furnishing Information on  
THIS FORM

PETER F. NERONHA

☒ U.S. Attorney ☐ Other U.S. Agency  
Phone No.Name of Asst.  
U.S. Attorney  
(if assigned)

PAMELA E. CHIN

## PROCEEDING

Name of Complainant Agency, or Person (&amp; Title, if any)

Homeland Security Investigations

☐ person is awaiting trial in another Federal or State Court  
(give name of court)☐ this person/proceeding transferred from another district  
per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges  
previously dismissed which were  
dismissed on motion of:☐ U.S. Attorney ☐ Defense☐ this prosecution relates to a  
pending case involving this same  
defendant. (Notice of Related  
Case must still be filed with the  
Clerk.)☐ prior proceedings or appearance(s)  
before U.S. Magistrate Judge  
regarding this defendant were  
recorded underSHOW  
DOCKET NO.MAG. JUDGE  
CASE NO.Place of  
offense RHODE ISLAND

County

USA vs.

Defendant: FRANKLIN LIBERATO

Address

☐Birth  
Date

Social

**REDACTED**Alien  
IneligibleIssue: ☐ Warrant ☐ Summons

Location Status:

Arrest Date \_\_\_\_\_ or Date Transferred to Federal Custody \_\_\_\_\_

☐ Currently in Federal Custody☒ Currently in State Custody STATE OF MASSACHUSETTS☒ Writ Required☐ Currently on bond☐ Fugitive

Defense Counsel (if any):

☐ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☐ This report amends AO 257 previously submitted

## OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 4

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	18 U.S.C. §§ 1591(a)(1) and (b)(1)	Sex trafficking of a child	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	18 U.S.C. § 1594(c)	Conspiracy to commit sex trafficking of a child	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	18 U.S.C. § 2423(a)	Trans. of a minor w/intent to engage in sexual activity	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
	18 U.S.C. § 2423(e)	Conspiracy to transport a minor w/intent to engage in	<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		criminal sexual activity.	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

## AFFIDAVIT

I, Rachel Robinson, Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI"), having been duly sworn according to law, depose and state as follows.

### INTRODUCTION

1. I am a Special Agent with Homeland Security Investigations and have been since May, 2007. As an 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 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 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. Based on my training and experience, I am familiar with the manner in which individuals are recruited, enticed or transported in interstate commerce for the purposes of engaging in prostitution and the methods of operation used by the transporters to advertise, recruit and transport possible victims for the purposes of engaging in prostitution. I am also familiar with the manner in which individuals, commonly referred to as 'pimps,' use mobile devices to recruit others, including persons under the age of 18 years old, to engage in prostitution, place advertisements for prostitution, pay for advertisements of prostitution, communicate with victims, and communicate with customers.

4. This affidavit is submitted in support of an arrest warrant and criminal complaint against Mackenzy SCOTT (DOB: 1996), a/k/a Bangzz, a/k/a Mackenzy Chandler Scott a/k/a Banks, and Franklin LIBERATO (DOB: 1994) for violations of 18 U.S.C. § 1591 (sex trafficking of children); 18 U.S.C. § 2423(a) (transportation of a minor with intent to engage in prostitution or criminal sexual activity); and conspiracy to violate 18 U.S.C. §§ 1591 and 2423 pursuant to 18 U.S.C. §§ 1594 and 2423(e), respectively.

5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 1591, § 2423(a), 1594, 2423(e) have been committed by the SCOTT and LIBERATO as discussed below.

**PROBABLE CAUSE**

6. The statements contained in this affidavit are based upon information provided to me by Warwick Police Detective Barbara Frazier, Seekonk Police Detective Thomas Hedrick and my personal observations, training and experience, review of relevant records related to this investigation, as well as information provided to me by other local law enforcement officers involved in this investigation. I have not included each and every fact known to me concerning this investigation, only those facts sufficient and necessary to establish probable cause to believe

8. VICTIM-1 is a 14 year old female who resides in North Providence, Rhode Island, with her mother, sister, sister's boyfriend and maternal grandmother.

9. On or about December 31, 2014, your Affiant was notified by Detective Frazier that VICTIM-1 was recovered from a Motel 6 in Warwick, Rhode Island, at approximately 12:00 p.m. when patrol officers responded to the motel for a disturbance. VICTIM-1 was found with a 17 year old female, who your affiant knows was affiliated with a previous sex trafficking case occurring in Cranston and Pawtucket, Rhode Island. Initial information received by investigators was that individuals assisting VICTIM-1's family in locating VICTIM-1 went to Motel 6 after they found an ad on

www.backpage.com depicting VICTIM-1. When family attempted to remove VICTIM-1 from the motel room, the disturbance resulted triggering the police response.

10. On or about December 31, 2014 at approximately 1:00 p.m., your Affiant and HSI Providence Special Agent Jodie Donaghy responded to the Warwick Police Department to conduct an initial interview of VICTIM-1. VICTIM-1 was also transported to Hasbro Children's Hospital in Providence, Rhode Island for medical evaluation.

11. VICTIM-1 provided the following information to investigators, including your affiant, over a series of interviews:

(1) VICTIM-1 stayed at the Motel 6 on Monday (12/29/14) and Tuesday (12/30/14) night with two people, a black male, identified to investigators as "Banks," and a 17 year old female. "Banks" has subsequently been identified as SCOTT.

(2) VICTIM-1 met SCOTT and the 17 year old female through an individual she identified and will be referred to as C.G. throughout this affidavit. VICTIM-1's first contact with C.G. was through social media, on Facebook, when C.G. added her as a friend in either October or November of 2014. A 16 year old female friend, VICTIM-2, later introduced VICTIM-1 to C.G. telling VICTIM-1 that she knew C.G. and used to hang out with him.

(3) VICTIM-1 told investigators that the first time money was exchanged for sexual acts was a day or two after Christmas around midnight. At the direction of C.G.,

VICTIM-1 had posted ads for herself on www.backpage.com using a pre-paid Visa and an old email address. In the ads, VICTIM-1 was wearing a black bra with pink cheetah print and blue underwear, and a belly button piercing of a crystal dangling with a pearl was also visible in the ads. VICTIM-1 had also texted pictures to C.G. believing it was C.G.'s telephone number that was going to be posted on the Backpage ad. The ad was placed on Backpage and C.G. received a response. An unidentified female then drove VICTIM-1, C.G., and another male known to the government who shall be referred to as A.S. throughout this affidavit to calls in various locations throughout the District of Rhode Island. She went to two locations in Warwick, one location in Providence, and one location in Pawtucket. VICTIM-1 stated she provided different sexual acts for money on some of these calls (approximately \$480 in total). The money from these calls was always given to "CHRISTIAN." At the end of the night, "CHRISTIAN" gave some money to VICTIM-1, "Abi" and the female driver, but "CHRISTIAN" kept the majority of the money.

(4) SCOTT was initially described by VICTIM-1 as a dark skinned male, with lots of tattoos, with many of them in cursive writing, including on his eyelid, a bird and writing on his chest, tattoo sleeves on both arms, ears gauged with little black circles, and a right eyebrow piercing that is a bar with silver points on the ends. VICTIM-1 advised your affiant that she engaged in sexual intercourse with SCOTT when she was staying at Motel 6 in Seekonk, Massachusetts. She believed SCOTT was 19 years of age. VICTIM-1 knows SCOTT's user name on Facebook as NewAtlantaBangzz.

(5) VICTIM-1 corresponded with SCOTT via Facebook beginning in the summer of 2014, however Monday, December 29, 2014, was the first time she met him in person. SCOTT arranged with VICTIM-1 that she would split any money 50/50 with him.<sup>1</sup> VICTIM-1 told investigators the rates were as follows: \$180 for 30 minutes, \$250 for 1 hour; "2 girl special" \$350 for 30 minutes, "2 girl special" \$400 for 1 hour. On or about December 30, 2014, she and the 17 year old female were driven by SCOTT to a location in Pawtucket and engaged in sexual acts for money.

(5) VICTIM-1 stated VICTIM-2 was with her for at least one of the commercial sex transactions described above.

(6) Initially, VICTIM-1 refused to identify other individuals who may have encouraged, forced, coerced, and/or facilitated this illegal commercial sexual activity.

12. On or about January 10, 2015, your Affiant and Detective Frazier interviewed VICTIM-2. During the interview, VICTIM-2 provided the following information:

(1) VICTIM-2 is aware that C.G. is friends with VICTIM-1 on Facebook. VICTIM-2 stated that she knows C.G. VICTIM-2 acknowledged going to C.G.'s house with VICTIM-1 on approximately five occasions.

(2) VICTIM-1 told VICTIM-2 that she would ride around with C.G. and make money for him, doing whatever he said, having sex or doing sexual jobs. VICTIM-1 told VICTIM-2 she did not like doing these jobs, and if VICTIM-1 had problems on the

---

<sup>1</sup> The Motel 6 room was rented from 12/31/14 to 01/01/15 by an additional male, whose identity is known to the government and will be referred to as S.M.



dates, or calls, she would call C.G.. VICTIM-2 reiterated to investigators that the VICTIM rode to the calls with a female driver and A.B. and that the money was split at the end of the night.

(3) VICTIM-2 told investigators that C.G. tried to make dates for her, saying they could make more money. C.G. asked for pictures of her, naked or wearing a bra and underwear. VICTIM-2 took pictures of herself on VICTIM-1's cellphone at VICTIM-1's residence in the bathroom. In the pictures VICTIM-2 wore a teal bra and regular underwear. However VICTIM-2 stated she did not send them to C.G.

(4) VICTIM-2 stated that she and VICTIM-1 were picked up by the 17 year old female and an unidentified Hispanic male with long hair and went to a party at a house in Providence after December 25, 2014, exact date unknown. VICTIM-1 saw her sister's friend at this party. VICTIM-2 stated she received a ride back to a Taco Bell from the Hispanic male. VICTIM-1 told VICTIM-2 that she was going to go with the 17 year old female to make money.

(5) The 17 year old female at the Providence house party is the same one that VICTIM-1 was with at the Motel 6 in Seekonk, Rhode Island as described above.

13. On January 12, 2015, an Administrative Summons was served to Backpage.com requesting information associated with (857) 236-9457, subsequently identified as SCOTT's phone number, which was the account associated with the ads on Backpage.com. That same day the following was received: Backpage.com Providence Posting ID 4597121 was posted on Wednesday, December 31, 2014 at 2:18 AM bearing

the title MIRANDA & CARLA upscale freaks □□□□□□□□□□ - 20." The advertisement read as follows: "Hey boys we're juicy loving and understanding with big hearts we don't bite unless you want us to ..we no what men like no regrets no refunds you will fall head over heels for our deep curves and soft smiles no blacks no regrets!!;) call or text me at any time (857)2369457 no thugs !!" The poster's age lists: "20." The location lists: "Providence - Warwick." The Post ID lists: "4597121, Providence." The advertisement was posted by an account under the name "deanthony724@gmail.com," and email [deanthony724@gmail.com](mailto:deanthony724@gmail.com). This advertisement contains a photograph of the VICTIM-1. The photograph depicts her torso, vaginal area and thigh area in a bubble bath. In this photograph, VICTIM-1 is wearing belly button ring bearing a dangling pearl.

14. In addition, the following ads were placed on Backpage.com with photographs of VICTIM-1 wearing a black bra with pink cheetah print and a lace thong, a belly button ring of a crystal dangling with a pearl: (1) Providence Posting ID 4595074 was posted on Monday, December 29, 2014 at 9:21 PM bearing the title "your dirty little secret □□□□ - 20" The advertisement read as follows: "I'm a kinky white girl who likes to have fun □□□ you treat me right I'll treat you better □□ come on let's have some guys ♥□□ call or text (857-236-9457)." The poster's age lists: "20." The location lists: "Providence." The Post ID lists: "4595074, Providence;" (2) Providence Posting ID 4587949 was posted on Friday, December 26, 2014 at 7:15 PM bearing the title "let's have some fun !!! - 20" The advertisement read as follows: "Im a naughty white girl on

the.naughty ☐☐ list just tryna have some fun ill make u feel at home baby☐ u give me what i want and ill give you what you want so jus make that call and ill pleasure you and give you whatever you desire lets have some fun tonight ☐☐☐☐ you can unwrap me tonight baby ☐ call or text (401-390-6564)." The poster's age lists: "20." The location lists: "Providence." The Post ID lists: "4587949, Providence." Both advertisements were posted by an account under the name "deanthony724@gmail.com," and email "deanthony724@gmail.com."

15. Your affiant conducted a public search on Facebook.com for "NewAtlanta Bangzz" believed to be utilized by SCOTT. A picture was posted on February 2, 2015, of SCOTT holding a large amount of cash fanned out, sitting on a bed in a hotel room with an orange wall behind the bed. Through experience, your affiant recognized the notable orange wall to be located in the Motel 6 in Seekonk, Massachusetts.

16. Your affiant conducted a public search on Facebook.com for VICTIM-1's profile. A picture was posted by VICTIM-1 on January 27, 2015 of VICTIM-1 and a male who appeared to be SCOTT sitting on a bed in an unrecognizable hotel, displaying their middle fingers at the camera.

17. On February 6, 2014, your affiant and Detective Frazier became aware that VICTIM-1 was missing from her residence, as her mother filed a missing person report with North Providence Police Department. Detective Frazier sent photographs of VICTIM-1 to Seekonk Police Detective Charles Mello. Members of the Seekonk Police Department began to check local hotels for VICTIM-1. Your affiant and Detective

Frazier were notified by Seekonk Police that VICTIM-1 was located at Motel 6 in Seekonk, Massachusetts with two male subjects and a 15 year old juvenile female. The male subjects were identified as Mackenzy SCOTT (DOB: 1996) and Franklin LIBERATO (DOB: 1994). The 15 year old female was later identified as a missing person out of Pawtucket, Rhode Island, hereinafter referred to as JUVENILE.

18. The JUVENILE was interviewed by your affiant at Motel 6 in Seekonk, Massachusetts. She stated the following:

(1) The JUVENILE met VICTIM-1 about a week ago through a friend that attends school with VICTIM-1. The JUVENILE arrived at Motel 6 in Seekonk, Massachusetts last night, February 5, 2015, at approximately 11 pm.

(2) The JUVENILE and VICTIM-1 were posted up in ads on Backpage.com with photographs of other people as they never post their real pictures. She and VICTIM-1 saw three customers that night, with the rates as follows: \$250.00 or more for a "two girl special;" and \$60.00 for a quick visit. VICTIM-1 would answer the phone calls. She also used a fictitious the name on Backpage.com.

(3) She stated that the first customer was a quick visit and paid \$60.00. The second customer requested full service for \$200 in total. The JUVENILE stated they would take their money and then tell the customer to go get a condom. Once the customer left, they would lock the door and not answer when the customer came back. SCOTT and LIBERATO were in the other room for their protection if something went wrong.

(4) The JUVENILE indicated that VICTIM-1 would give 50 percent of the money she made to SCOTT. The JUVENILE stated she made approximately \$170.00.

19. VICTIM-1 was interviewed at the Seekonk Police Department by your affiant and Detective Frazier. VICTIM-1 provided the following information to investigators:

(1) VICTIM-1 arrived at Motel 6, in Seekonk, Massachusetts on the 29<sup>th</sup> or 30<sup>th</sup> of January, 2015.

(2) At the motel, VICTIM-1 used LIBERATO'S cellular phone to post ads on backpage.com.

(3) VICTIM-1 saw approximately 20 customers. She said she would work as an escort on her own to make money because she did not want to return home. She would give the customers a hand job then ask if they had a condom, they would say "no." She would make them go to a store to get one then lock them out of her room.

(4) She picked up the JUVENILE at the Motel 6 in Warwick, Rhode Island last night February 5, 2015. She rode in an older model car from the Motel 6 in Warwick, Rhode Island with the JUVENILE, a 31 year old male unidentified subject, and SCOTT.

20. On February 6, 2015, your affiant and Detective Hedrick interviewed LIBERATO at the Seekonk Police Department. LIBERATO was advised of his Miranda warnings, waived his rights, and agreed to be interviewed. LIBERATO provided the following information:

(1) VICTIM-1 knew SCOTT through a 17 year old juvenile female. He stated that VICTIM-1 and the 17 year old juvenile female would hang out at the 17 year old juvenile's residence.

(2) VICTIM-1 and SCOTT have a girlfriend/boyfriend relationship. VICTIM-1 told him she engaged in sexual intercourse with SCOTT.

(3) SCOTT had been at the Motel 6 in Seekonk, Massachusetts, since on or about February 2, 2015.

(4) SCOTT would drive LIBERATO'S vehicle and take VICTIM-1 to outcalls. SCOTT would make fifty percent of what VICTIM-1 made.

(5) LIBERATO met the JUVENILE a couple days ago. The JUVENILE would also pay SCOTT fifty percent of what she made. According to LIBERATO, the JUVENILE went into the other hotel room and gave SCOTT a "blow job" at the Motel 6 in Seekonk, Massachusetts.

(6) LIBERATO's cellular phone was used to post the ads on backpage.com. VICTIM-1 and the JUVENILE would answer the phone calls. VICTIM-1 and the JUVENILE would bring the customers upstairs to a room at Motel 6 in Seekonk, Massachusetts.

(7) SCOTT drove VICTIM-1 to approximately 15 outcalls, in LIBERATO's father's black Solara. The locations of the outcalls were in Providence, Pawtucket, Portsmouth, Rhode Island, and New Bedford, Massachusetts. LIBERATO's father's phone was also used to post advertisements on backpage.com. According to

LIBERATOR, SCOTT has two other juvenile females working for him believed to be approximately 14 years old and 15 or 16 years old.

21. On February 6, 2015, your affiant and Detective Hedrick interviewed SCOTT at the Seekonk Police Department. SCOTT was advised of his Miranda warnings, waived his rights, and agreed to be interviewed. SCOTT provided the following information:

(1) SCOTT goes by the nickname "BANGZZ." He knows LIBERATO from school. He has been at Motel 6 in Seekonk, MA since February 2, 2015 with VICTIM-1 and LIBERATO.

(2) His cousin, D.M., also had a room at the Motel 6 in Seekonk.

(3) SCOTT engaged in sexual activity approximately three times with VICTIM-1 at Motel 6 in Seekonk.

(4) SCOTT used his phone to post advertisements on backpage.com in Warwick at the Motel 6. VICTIM-1 used his phone to post advertisements on backpage.com in Seekonk, MA.

(5) VICTIM-1 gave him fifty percent of the money she makes from all the calls. The first prostituting of VICTIM-1 was in December, 2014. He posted VICTIM-1 on backpage.com at Motel 6 in Warwick, Rhode Island from his phone number. He met VICTIM-1 at C.G.'s residence approximately in November 2014. He engaged in sex with VICTIM-1 at the Motel 6 in Warwick, RI around New Years. He was aware VICTIM-1 was 15 years old.

(6) C.G. moved to Florida on or about February 2, 2015.

(7) SCOTT picked up pimping from the 17 year old juvenile female in September or October 2014. The 17 year old juvenile female asked him to use his phone to post advertisements on backpage.com and would give him a portion of the money. The money was not 50 percent, as she was basically the "boss." The last time he talked to the 17 year old juvenile female was a couple weeks ago.

22. SCOTT was charged with trafficking of person under 18 for sexual servitude and deriving support from a prostitute, statutory rape of a child and possession of child pornography by the Seekonk Police Department. LIBERATO was charged with Trafficking of person under 18 for sexual servitude and deriving support from a prostitute by Seekonk Police Department.

23. On February 10, 2015, an Administrative Summons was served to Backpage.com requesting information associated with (201) 589-7416, (401) 516-1633 and (857) 236-9457 which was the account associated with the ads on Backpage.com. That same day the following was received: (1) Backpage.com Providence Posting ID 4634899 from an advertisement posted on January 18, 2015 at 11:31pm bearing the title: "sexy slim and fun sized Roxy ☐!!☐☐ - 20" The advertisement read as the following: "Hello Gentleman! My Name is Roxy ♥ I am very fun and outgoing,I am also fettish friendly ☐☐ dont be shy come have some with your favorite white girl ☐☐☐ you treat me good ill treat you better and attend to your every need ☐☐ Call or text (857 312 1700)." Location: , Cranston. Poster's age lists "20." The advertisement was posted from



an account name and email listed as [newatlantabangzz@gmail.com](mailto:newatlantabangzz@gmail.com) (2) Backpage Posting ID 4657529 from an advertisement on Friday, January 30, 2015 at 10:01 pm bearing the title: "sexy little russian secret ☐☐ - 20." The advertisement read as the following: ☐ SERIOUS CALLERS ONLY☐♥SAME DAY APPOINTMENTS READY NOW☐♥☐ Experience"★★★★★☐☐☐☐ >>I am the perfect mix of SEXY☐ SASSY☐☐ and SWEET☺☐☐ Adorable yet exotic, ☐☐☐☐ topped off with a WILD personality and a breath taking body♥☐☐ ★★I am the complete package ★★\* Fetish welcomed♥☐♥☐☐ \$150 For an hour \$100 for a half an hour \$70♥☐☐☐ \*\*NO African-American\*\* CONTACT Candie☐ at (401 516 1633)." Poster's age lists "20." Location: , rhode island.

The advertisement was posted from an account name and email listed as

[newatlantabangzz@gmail.com](mailto:newatlantabangzz@gmail.com) (3) Backpage.com Providence Posting ID 4661131 from an advertisement posted on Saturday, January 31, 2015 at 10:01 pm bearing the title:

"sexy little russian secret ☐☐ - 20." The advertisement read as the following: "♥☐ SERIOUS CALLERS ONLY☐♥SAME DAY APPOINTMENTS READY NOW☐♥☐ ★★ ★★★★★"Five-Star Experience"★★★★★☐☐☐☐ >>I am the perfect mix of SEXY☐ SASSY☐☐ and SWEET☺☐☐ Adorable yet exotic, ☐☐☐☐ topped off with a WILD personality and a breath taking body♥☐☐ ★★I am the complete package ♥☐☐☐ Fetish welcomed♥☐♥☐☐ \$150 For an hour \$100 for a half an hour \$70 quick visit♥☐☐☐ \*\*NO African-American\*\* CONTACT Candie☐ at (401 516 1633)." Poster's age lists "20." Location: , rhode island. The advertisement was posted from an account name and email listed as [newatlantabangzz@gmail.com](mailto:newatlantabangzz@gmail.com). (4) Backpage.com Providence

Posting ID: 4661799 posted on Sunday, February 1, 2015 at 10:09 am bearing the title "worlds best package deal ☐☐☐ 20." The advertisement read as the following: "2 thick beautiful white women who will cater to your every need☐☐ we also welcome all fetishes. Serious callers only, and for those who do contact us we promise to show you the best time of your life☐☐☐ Half hour 200\$ full hour 250\$ Contact Hazel and Desire (401 585 9520) ♥♥♥♥♥" Poster's age list "20." Location: , Rhode Island. The advertisement was posted from an account name and email listed as [newatlantabangzz@gmail.com](mailto:newatlantabangzz@gmail.com). (5) Backpage.com Providence Posting ID: 4662548 posted on Sunday, February 1, 2015 at 11:41 PM bearing the title "sexy and classy package deal ☐☐ 20." The advertisement read as follows: "2 thick beautiful white women who will cater to your each and every need☐☐ we also welcome all fetishes. We offer five star a experience☐☐☐ Serious callers only, and for those who do contact us we promise to show you the best time of your life☐☐☐ you wount regret a single penny you spend on us or a second you spend with us garentted Half hour 150\$ full hour 200\$ quick visit 100\$ Contact Hazel and Desire (401 585 9520) ♥♥♥♥♥" Poster's age lists "20." Location: , rhode island. The advertisement was posted from an account name and email listed as [newatlantabangzz@gmail.com](mailto:newatlantabangzz@gmail.com). (6) Backpage.com Providence Posting ID: 4663425 posted on Monday, February 2, 2015 at 6:51 pm bearing the title: "best package deal around♥ classy descrite woman☐ - 20." The advertisement read as the following: "2 thick beautiful white women who will cater to your each and every need☐☐ we also welcome all fetishes. We offer five star a experience☐☐☐ Serious

callers only, and for those who do contact us we promise to show you the best time of your life ☐☐☐ you won't regret a single penny you spend on us or a second you spend with us guaranteed Half hour 150\$ full hour 200\$ quick visit 100\$ Contact Hazel and Desire (401 585 9520) ♥♥♥♥♥." Poster's age lists "20." Location: , Rhode Island. The advertisement was posted from an account name and email listed as [newatlantabangzz@gmail.com](mailto:newatlantabangzz@gmail.com). (7) Backpage.com Providence Posting ID: 4665005 posted on Tuesday, February 3, 2015 at 11:28 pm bearing the title: "the sweetest candie ☐☐ lets have some fun ☐☐ - 20." The advertisement read as follows: "♥ Gentleman only ☐ clean and discrete services ♥ unrushed satisfaction ☐ serious inquiries only ♥ sexy and seductive ☐ petit, Brown hair, blue eyes, 5'2 ♥ incalls only Donations Quick visit 80 Half hour 150 Hour 200, if interested contact (401 516 1633)." Poster's age lists "20." Location: , Rhode Island. The advertisement was posted from an account name and email listed as [newatlantabangzz@gmail.com](mailto:newatlantabangzz@gmail.com). (8) Backpage.com Providence Posting ID: 4661677 posted on Wednesday, February 4, 2015 at 6:43 PM bearing the title "sexy little russian secret ☐☐ 20." The advertisement read as follows: "♥☐ SERIOUS CALLERS ONLY☐♥SAME DAY APPOINTMENTS READY NOW☐♥ ★★★★★"Five Star Experience"★★★★★☐☐☐☐ >>I am the perfect mix of SEXY☐ SASSY☐☐ and SWEET☺ ☐ Adorable yet exotic, ☐☐☐☐ topped off with a WILD personality and a breath taking body♥ ☐ ★★I am the complete package ♥ ☐☐ Fetish welcomed♥ ♥ ☐ \$150 For an hour \$100 for a half an hour \$70 quick visit♥ ☐☐ \*\*NO African American\*\* CONTACT Candie☐ at (401 516 1633)." Poster's age lists "20." Location: Rhode Island.

The advertisement was posted from an account name and email listed as [newatlantabangzz@gmail.com](mailto:newatlantabangzz@gmail.com). (9) Backpage.com Providence Posting ID: 4662785 posted on Thursday, February 5, 2015 at 1:53 am bearing the title "your dirty little secret□□□□ 20." The advertisement read as follows: "♥□ SERIOUS CALLERS ONLY□♥SAME DAY APPOINTMENTS READY NOW□♥ ★★★★★"FiveStar Experience"★★★★★□□□□ >>I am the perfect mix of SEXY□ SASSY□□ and SWEET☺ □ Adorable yet exotic, □□□□ topped off with a WILD personality and a breath taking body♥ □ ★★I am the complete package ♥ □□ Fetish welcomed♥ ♥ □\$150 For an hour \$100 for a half an hour \$70 quick visit♥ □□ \*\*NO AfricanAmerican\*\* CONTACT Candie□ at (401 649 7519)." Poster's age lists "20."

Location: , rhode island. The advertisement was posted from an account name and email listed as [newatlantabangzz@gmail.com](mailto:newatlantabangzz@gmail.com). (10) Backpage.com Providence Posting ID: 4669083 posted on Friday, February 6, 2015 6:54 AM bearing the title "your little exotic russian secret□□ 19." The advertisement read as follows: "Im a high class discrete classy woman♥ ill take care of each and every one of your wants and needs□□ ♥ you wount regret a second you spend with me or a dollar you spend on me□ Serious callers only Gentleman Only No african americans 2 girls available Fetishes welcome if your looking for five star service contact candie♥□□ at 2015897416." Poster's age is listed as "19." Location: , rhode island. The advertisement was posted from an account name and email listed as [newatlantabangzz@gmail.com](mailto:newatlantabangzz@gmail.com).

27. Based on my training and experience in human trafficking investigations, I am aware that victims often protect the individuals who traffic them and are reluctant to disclose information to law enforcement. I am also aware that victims typically obtain the money to post advertisements on backpage.com from their pimps or from proceeds of prostitution activities. I know, based on my training and experience, that individuals who traffic minors and adults often distance themselves from the locations where the prostitution is taking place in order to evade detection and capture by law enforcement.

28. Based on my training and experience, as well as discussions with other investigators involved with this case, I believe that probable cause exists that the individuals identified as SCOTT and LIBERATO have been involved with the commercial sex trafficking of VICTIM-1, in violation of 18 U.S.C. § 1591(a); conspiracy to commit commercial sex trafficking of VICTIM-1, in violation of 18 U.S.C. §1594; transporting a minor with the intent to engage in commercial sexual activity, in violation of 18 U.S.C. §2423(a); and conspiracy to transporting a minor with the intent to engage in commercial sexual activity, in violation of 18 U.S.C. § 2423(e).

### CONCLUSION

29. Based on the forgoing, I request that the Court issue the proposed arrest warrants.

30. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a),

(b)(1)(A) & (c)(1)(A). Specifically, the Court is "a district court of the United States that has jurisdiction over the offense being investigated." 18 U.S.C. 2711(3)(A)(i).

23. I further request that the Court order that all papers in support of this application, including the affidavit and arrest warrant, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation.

  
RACHEL L. ROBINSON  
Special Agent  
Department of Homeland Security

Sworn and subscribed in my presence  
on this 21<sup>st</sup> day of February 2015.

  
Lincoln D. Almond  
United States Magistrate Judge  
District of Rhode Island