

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

LOUIS K. WEST III,

Defendant.

COMPLAINT

Violations of 18 U.S.C. §§ 2251(a) and
(e), 2422(b) and 2260A

COUNTY OF OFFENSES:
ORANGE

SOUTHERN DISTRICT OF NEW YORK, ss.:

EMILY ROKITOWSKI, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation (the "FBI"), and charges as follows:

COUNT ONE
(Sexual Exploitation of a Minor)

1. On or about March 26, 2026, in the Southern District of New York and elsewhere, LOUIS K. WEST III, the defendant, employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct, and attempted to do so, for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce and in or affecting interstate and foreign commerce and mailed, and the visual depiction was produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer, and the visual depiction was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, to wit, LOUIS K. WEST III, the defendant, attempted to meet with an individual he believed to be a 14-year old girl to engage in sexually explicit conduct for the purpose of producing photographs of such conduct.

(Title 18, United States Code, Sections 2251(a) and (e).)

COUNT TWO
(Coercion and Enticement of a Minor)

2. On or about March 26, 2026, in the Southern District of New York and elsewhere, LOUIS K. WEST III, the defendant, knowingly, using a facility and means of interstate and foreign commerce, persuaded, induced, enticed, and coerced an individual who had not attained the age of 18 years to engage in prostitution and sexual activity for which a person can be charged with a criminal offense, and attempted to do so, to wit, WEST, in communications over the internet and phone, agreed with an individual acting in an undercover capacity and posing as the aunt of a 14-

year-old girl to meet the 14-year-old girl in Orange County, New York for the purpose of engaging in sexual activities.

(Title 18, United States Code, Section 2422(b).)

COUNT THREE
(Penalties for Registered Sex Offenders)

3. On or about March 26, 2026, in the Southern District of New York and elsewhere, LOUIS K. WEST III, the defendant, being required by Federal and other law to register as a sex offender, committed felony offenses involving a minor under Title 18, United States Code, Section 2251 and 2422, to wit, the violation of Title 18, United States Code, Sections 2251(a) and (e) charged in Count One of this Complaint, and the violation of Title 18, United States Code, Section 2422(b) charged in Count Two of this Complaint.

(Title 18, United States Code, Sections 2260A.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

4. I have been a Special Agent with the FBI since in or about June 2022. Previously, starting in or about September 2019, I was an Intelligence Analyst with the FBI. I have participated in numerous investigations involving crimes against children, including the receipt, possession, and/or distribution of child pornography by electronic means, sexual exploitation, and enticement of minors. I have gained expertise in these areas through training and daily work related to conducting these types of investigations.

5. I have been personally involved in the investigation of this matter. This Complaint is based upon my conversations with law enforcement agents and others, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where figures, calculations, and dates are set forth herein, they are approximate, unless stated otherwise.

6. Based on my participation in this investigation, my discussions with other members of law enforcement, and my review of law enforcement reports and records, I am aware of the following, in substance and in part:

a. On or about March 25, 2026, an advertisement was placed on an online platform featuring photographs of a young female and offering prostitution services. The advertisement included a link to a contact phone number ending in -2230 (the "2230 Number").

b. On or about March 26, 2026, at approximately 9:43 p.m., an individual using a telephone number ending in -2755 (the "2755 Number") contacted the 2230 Number and asked, "You available." At approximately 9:44 p.m., a law enforcement officer ("Officer-1") acting in an undercover capacity responded, "Yes honey." Approximately several seconds later, the 2755

Number asked, in part, "How much for [a] quick visit"? Officer-1 responded, in part, "140 for the young one." At approximately 9:48 p.m., the 2755 Number asked, in part, "The Young Ones the white one right"? Officer-1 replied, in part, "yeah baby" and "the one from the ad." The 2755 Number asked, in part, "where she at and is she in a room by herself or is she in the room with another girl"? Officer-1 responded, in part, "No I'm her aunt. you will be alone with her."

c. At approximately 9:51 p.m., Officer-1 asked the 2755 Number, in part, "are you affiliated with law enforcement?" The 2755 Number responded, in part, "No I am not I am 45 white and single." Officer-1 stated, in part, "shes young, just want to make sure thats ok so there are no surprises." The 2755 Number asked, in part, "is she legal age." Officer-1 responded, in part, "shes 14." The 2755 Number asked, in part, "How do I know you're not a cop"? Officer-1 responded, in part, "how do i know you aren't"? The 2755 Number responded, in part, "Good point 140 cash and I can have my way with her." The 2755 Number subsequently asked, in part, "where [is] she located"? Officer-1 responded, in part, "can you take a pic of the [convenience store] on Rt 17k to show me ur real? I'm right near there"? The 2755 Number replied, in part, "Yeah but it's going to take me a little while to get there I'm over in Poughkeepsie it'll take me about an hour is that okay I'll take the picture once I'm close." The 2755 Number also messaged, in part, "no clock watches right I can take my time with her." After Officer-1 confirmed, in part, "you wont be rushed," the 2755 Number replied, in part, "Okay good and I'm a Down Low I can bring you a lot of business" followed, in part, by "I'm not rich but some of the people I roll with would give \$1,000 an hour without the link in the night if it's the girl that was in the picture."

d. At approximately 10:58 p.m. a black Nissan four door sedan bearing registration ending in -4138 (the "Nissan") arrived to the vicinity of a convenience store located on Route 17K in Newburgh, New York (the "Convenience Store").

e. At approximately 10:58 p.m., the 2755 Number messaged Officer-1, in part, "Here," followed by a photograph of the Convenience Store. At approximately 11:08 p.m., Officer-1 replied, in part, "just heading back to the place from getting her food." The 2755 Number asked, in part, "she ready"? At approximately 11:16 p.m., the 2755 Number asked, in part, "where am i headed"? Officer-1 replied, in part, "I'm at the [retail store] in the white RV" and "I'll wait outside for you."

f. At approximately 11:19 pm, members of law enforcement observed LOUIS K. WEST III, the defendant, exit the Nissan and approach a nearby RV. Upon arriving to the vicinity of the RV, WEST was met by an undercover officer (the "UC") who asked, in substance and in part, whether WEST had a condom. WEST flashed a condom he was carrying in his pocket and confirmed that the \$140 price included anal sex and that he could "take his time" during the encounter. The UC told WEST not to hurt her, and WEST moved to follow the UC to the RV.

g. After this discussion, the UC approached the RV and several members of law enforcement arrested WEST. During a search of WEST's person, law enforcement found, among other things, approximately \$140 in cash, a cellphone, an alarm clock with a hidden camera, a small bottle of lotion, and approximately two condoms. WEST was also wearing a pair of eyeglasses that law enforcement officers later discovered were apparently designed to record video.

h. Based on my examination of the alarm clock hidden camera, I know that the camera bore a memory card that, based on my review of public records, I understand to be manufactured, in whole or in part, outside of New York.

i. WEST was transported to the New York State Police Barracks in Montgomery. After being advised of his rights, WEST stated, in substance and in part, that he had come across an advertisement on an online platform for various sexual services, he contacted the call number associated with the advertisement and indicated that he was interested in a quick visit, he was told that the female in the advertisement was approximately 14 years old, he was surprised and disgusted upon learning of her age and assumed she was older, and, while he traveled to the Convenience Store to have sex, if, upon his arrival, he discovered that the female was in fact a minor, he planned to use the camera to document his surroundings and then contact law enforcement.

Criminal History

7. Based on my review of a criminal history report for LOUIS K. WEST III, the defendant, I know that, on or about April 10, 2013, WEST was convicted, upon a plea of guilty, of Attempted Criminal Sexual Act-1st Degree: By Forceful Compulsion, in violation of New York Penal Law Section 130.50(1), and sentenced principally to a term of eight years' imprisonment to be followed by ten years' supervision. The report also indicates that WEST was required to register as a sex offender.

WHEREFORE, I respectfully request that LOUIS K. WEST III, the defendant, be imprisoned or bailed, as the case may be.

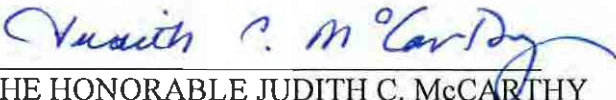
/s/ Emily Rokitowski by JCM with permission

EMILY ROKITOWSKI

Special Agent

Federal Bureau of Investigation

Sworn to before me through the transmission of this
Affidavit by reliable electronic means (FaceTime)
this 27th day of March, 2026.



THE HONORABLE JUDITH C. McCARTHY

Chief United States Magistrate Judge

Southern District of New York