
United States District Court

WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,

CRIMINAL COMPLAINT

v.

Case Number: 16-MJ-00182-JTM

MARIO AMBROSE ANTOINE, also known as
as “Mario Sixstring,” “Mario Ferrari,” “Chris Campbell,”
“Dalton Wayne,” “Ryan Bollman,” “Reyna Dash,”
“Carmen Resben,” and “Nikki,”
[DOB:12/21/1982]

Count One

18 U.S.C. § 2422(a)
NMT Twenty Years Imprisonment,
NMT \$250,000 Fine, NLT 5 Years Supervised Release,
Class C Felony, Plus \$100 Special Penalty Assessment

Count Two

18 U.S.C. § 1503
NMT Ten Years Imprisonment,
NMT \$250,000 Fine, NMT 3 Years Supervised Release,
Class C Felony, Plus \$100 Special Penalty Assessment

1. **I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.**

COUNT ONE

2. **Between on or about May 21, 2015 and May 26, 2015, in the Western District of Missouri and elsewhere, the defendant, MARIO AMBROSE ANTOINE, using a facility and means of interstate and foreign commerce, knowingly attempted to persuade, induce, entice, and coerce an individual, VICTIM 5, a resident of the state of Kansas, to travel in interstate or foreign commerce, from Kansas to Missouri, to engage in prostitution or in any sexual activity for which any person can be charged with a criminal offense, that is, the following felonies proscribed by the State of Missouri, such as, but not limited to: rape in the second degree (MO. REV. STAT. § 566.031), sodomy in the second degree (MO. REV. STAT. § 566.061), and promoting obscenity (MO. REV. STAT. § 573.020(1)), all in violation of Title 18, United States Code, Section 2422(a).**

COUNT TWO

3. **I further state the following is true and correct to the best of my knowledge and belief. Between on or about September 10, 2016, and October 5, 2016, in the Western District of Missouri and elsewhere, the defendant, MARIO AMBROSE ANTOINE, did corruptly influence, obstruct and impede or endeavor to influence, obstruct, and impede the due administration of justice regarding a federal grand jury in the Western District of Missouri, by making false material statements to federal and state agents investigating his crimes that the Federal Bureau of**

Investigation was no longer pursuing this investigation, and that his attorney had cast doubt on the procedural sufficiency of the search warrants, when in fact the Federal Bureau of Investigation was continuing its investigation and said attorney had not been consulting with ANTOINE, in violation of Title 18, United States Code, Section 1503.

4. I further state that I am a Special Agent and that this complaint is based on the following facts:

(See attached affidavit.)

Continued on the attached sheet and made a part hereof:

☒ Yes

☐ No



Signature of Complainant

Trisha DeWet, Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

October 6, 2016

Date

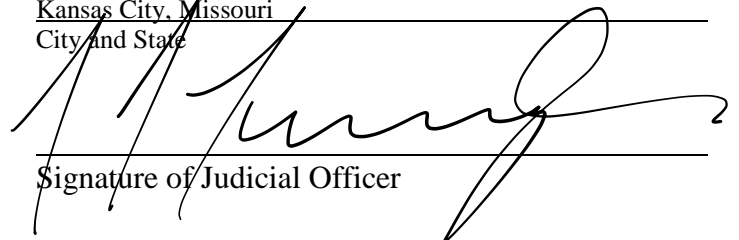
at

Kansas City, Missouri
City and State

HONORABLE JOHN T. MAUGHMER

United States Magistrate Judge

Name and Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT

I, Trisha DeWet, Special Agent with the Federal Bureau of Investigation (“FBI”), being duly sworn, state the following is true and correct to the best of my knowledge and belief:

1. This affidavit is in support of a criminal complaint charging **MARIO AMBROSE ANTOINE** (“**ANTOINE**”), also known as “Mario Sixstring,” “Mario Ferrari,” “Chris Campbell,” “Dalton Wayne,” “Ryan Bollman,” “Reyna Dash,” “Carmen Resben,” and “Nikki,” with online enticement (in violation of 18 U.S.C. § 2422(a)) and obstruction of the due administration of justice (in violation of 18 U.S.C. § 1503(a)).

2. The facts and information contained in this affidavit are based in part on my consultation with detectives with the Raymore Missouri Police Department (“RPD”), interviews with multiple victims, evidence recovered from **ANTOINE**’s residence, through state and federal search warrants, and other various records. Because this affidavit is being submitted for the limited purpose of supporting the criminal complaint, I have not included each and every fact known to me concerning this investigation, but rather have set forth only the facts that I believe are necessary to establish the necessary foundation for the requested complaint.

Overview of ANTOINE’s Fraud Scheme

3. Over the last few years, dozens of young women throughout the Kansas City metropolitan area have been contacted through Facebook by a woman named “Nikki.” I have learned through the course of this investigation that the following would occur: “Nikki” would compliment the women on their looks, asking them if they were interested in modeling. Eventually the conversation would shift towards adult modeling, with the promise of payment of tens of thousands of dollars and assurances these photos and images would only be accessible on overseas

private websites. “Nikki” would arrange these photoshoots with local photographers – “Mario” or “Chris” – and the women would be directed to go to a house in Raymore, Missouri for their audition. “Mario” or “Chris” would show these women purported checks given to other performers, tax forms, and other formal documentation as to the legitimacy of this enterprise, and would have the women execute contracts and model release forms, promising payments as high as \$33,000 for the audition and requisite sexual activity, which “Mario” and “Chris” acted as the male performer for this sexual activity while recording it and taking photographs. “Nikki” and the photographer (“Mario” or “Chris”) would later thank the young female, assuring them that the check would be arriving shortly. It should be noted that “Nikki” never attended these photo shoots in person, nor did she communicate with them on telephone; virtually all of these communications occurred through Facebook messages.

4. Months would pass and none of these women were ever paid. The young women would reach out to “Nikki” or “Mario” asking when the money would arrive, and were given excuses. Eventually, in many cases, “Nikki” or “Mario” or various other strangers on newly-created Facebook profiles would contact the friends, boyfriends, or employers of these women. These friends, boyfriends, or employers would receive messages informing them that the young woman was a porn star, and these messages would often be accompanied by pictures of the young women engaged in the sexual activity.

5. Beginning in December 2015, Det. Don Shepard with RPD developed evidence over the course this investigation that “Nikki” and “Mario” and these assorted Facebook profiles were all the aliases of one person: **MARIO AMBROSE ANTOINE** (“**ANTOINE**”). Det. Shepard interviewed numerous affected victims and recovered evidence from **ANTOINE**’s residence and social media websites such as Facebook. I began working with Det. Shepard in

February 2016, and continued to work with him to identify all of **ANTOINE**'s affected victims, which number in the dozens, as part of a federal grand jury investigation into these crimes.

Background on MARIO ANTOINE

6. Over the last few years **ANTOINE** has resided at numerous residences throughout the Kansas City metropolitan area in Kansas and Missouri. For a short time in approximately 2011 and 2012, **ANTOINE** resided in Nashville, Tennessee, in an effort to become a country musician and songwriter (as "Mario Sixstring") before returning to Kansas City shortly thereafter. While in Tennessee, **ANTOINE** pled guilty to felony theft in Davidson County on June 8, 2011. **ANTOINE** eventually returned to Kansas City thereafter, and was charged by the Office of the Missouri Attorney General with ten felony counts of stealing by deceit and unlawful merchandising practices for his fraudulent wedding photography business scams.¹ **ANTOINE** was convicted in September 2013 on nine of these ten counts. On December 11, 2015, **ANTOINE** had his probation revoked, and he was released early on or about September 10, 2016.

7. Prior to his recent incarceration, **ANTOINE** worked for or created various entities as part of this photography business, including but not limited to Short Dog Digital Corp. (a now-defunct corporation formed in Kansas), and Imagine Photo KC, Moon Rocket Photo, MoonRocketMediaKC, and MoonRocketPhotoKC (each formed in Missouri). **ANTOINE**'s previous and concurrent activity as a duplicitous wedding photographer during the offenses committed in the course of this investigation has subjected him to extensive criminal convictions

¹ See AG Koster charges Kansas City wedding photographer for scamming brides, (2012). <https://ago.mo.gov/home/news-archives/2012-news-archives/ag-koster-charges-kansas-city-wedding-photographer-for-scamming-brides> (last accessed on September 29, 2016).

and civil liability. In addition, many of these acts described herein were committed while **ANTOINE** was on probation for his previous convictions.²

Summary of the Investigation

8. Det. Shepard and I have reviewed (and continue to review) **ANTOINE**'s extensive cache of digital evidence in an effort to identify all of the victims of this expansive fraud scheme. In the course of this investigation, we have identified dozens of victims to date, through the observation of numerous images, video recordings, and copies of the signed contracts and model release forms.

9. We have developed evidence that **ANTOINE** was aware of the criminality of these sexual acts. One of **ANTOINE**'s phones contains numerous Internet web searches which demonstrate his appreciation for the criminality of his predatory sexual behavior and demonstrate his willfulness in doing so. For example, I am aware **ANTOINE** used one of his cell phones to visit rapebyfraud.com, a website hosted by a sexual assault survivor which seeks to educate women how to avoid sex assault scams such as this one perpetrated by **ANTOINE**. **ANTOINE** also used this same phone to conduct Google searches for "rape by deception," "rape by deception kansas," and "illegal to trick girls into sleeping with you." **ANTOINE** also downloaded and reviewed scholarly legal journals exploring the lack of consent when rape by fraud, deception, and coercion occurs. On November 12, 2015, **ANTOINE** downloaded a PDF file of a law journal article by Patricia J. Falk entitled "Rape by Fraud and Rape by Coercion."³ On that same date, **ANTOINE** used his cell phone to access a law student's blog authored by Daniel J. Slomnicki hosted at the New York State Bar Association entitled "Rape By Fraud, Deception Or Impersonation – An

² See *State of Missouri v. Mario A. Antoine*, Case No. 1216-CR04899-01.

³ Patricia J. Falk, *Rape by Fraud and Rape by Coercion*, 64 Brooklyn Law Review 39 (1998).

Addition To New York’s Penal Law: Rape In The First Degree Statute.”⁴ This article suggests a modification to the New York Penal Law to follow the Model Penal Code in declaring consent to be ineffective if obtained by deception, specifically mentioning that the “New York legislature could follow the Missouri legislature in defining consent to be invalid ‘if it is induced by force, duress, or deception,’” then citing to the relevant Missouri statute.⁵

Example of ANTOINE’s Fraudulent Conduct with One of His Victims

10. Between or about May 21, 2015, and October 30, 2015, **ANTOINE**, as both “Nikki” and “Mario Sixstring,” sent a series of messages via Facebook to VICTIM 5, a resident of Kansas, which contained numerous false and fraudulent pretenses, representations, and promises as to the legitimacy of this pornographic enterprise and the prospect of payment to VICTIM 5.

11. On or about May 21, 2015, **ANTOINE**, as “Nikki,” sent a series of messages via Facebook to VICTIM 5, inquiring whether VICTIM 5 was interested in modeling. **ANTOINE** sent messages VICTIM 5, writing “I do some adult ~~modeling~~ stuff on the side...pays amazing...it goes to countries where nobody here will ever know it exists or ever see it.”

12. On or about May 25, 2015, **ANTOINE**, as “Nikki,” sent a series of messages via Facebook to VICTIM 5, identifying the photographer as “Mario Sixstring...he just added you on Facebook.” Minutes later, **ANTOINE**, as “Mario Sixstring,” sent a series of messages via Facebook to VICTIM 5, writing “Hey Nicole said to message ya.”

⁴ Slomnicki, Daniel J. “Rape By Fraud, Deception Or Impersonation – An Addition To New York’s Penal Law: Rape In The First Degree Statute.” New York State Bar Association blog.

http://nysbar.com/blogs/lawstudentconnection/2013/11/rape_by_fraud_deception_or_imp.html (last accessed on September 29, 2016).

⁵ *Id.*; cf. MO. REV. STAT. § 556.061(5)(c) (2013).

13. On or about May 26, 2015, **ANTOINE**, as “Mario Sixstring,” sent a series of messages via Facebook to VICTIM 5, writing “I work with an Agency...you should fill out an app,” and directing her to a purported website for “Dash Agency.” **ANTOINE** sent additional messages, writing that “(Nikki) does those shoots, and they go overseas...so nobody here can see them...she makes a killer living at it...I mean, I dont judge, \$10k-15k for 25 mins of work...I’d do it if i was a girl haha.”

14. On or about May 26, 2015, **ANTOINE**, again as “Nikki,” reassured VICTIM 5 that “there is NO way anyone could find out.” When VICTIM 5 asked **ANTOINE** “How do you know?” **ANTOINE** responded, “because you have 5 friends who’ve done it...and over 58 girls in KC from the last 3 years have done them...not ONE has ever been found out...EVER.” **ANTOINE** informed VICTIM 5 she could make “\$4k for handjob...\$8k for head...or \$12k and up for intercourse...you can make \$12k in 30 mins fucking.” **ANTOINE** reassures VICTIM 5 the hosting website is overseas and private and “there is ZERO chance anyone will ever find out...unless you tell them.” **ANTOINE** sent VICTIM 5 a picture of thousands worth of dollar bills spread out over a car seat, writing “thats just what i keep in my safe at home ;)...i have about another \$55k in the bank,” and that she had made \$140,000 for ten photo shoots last year. **ANTOINE** (as “Mario Sixstring”) then also separately messaged VICTIM 5 that “(Nikki) makes a killer living at it...like \$140k a year.” **ANTOINE**, reverting again to “Nikki,” asked VICTIM 5 “wanna see what I made last year?” and sent a picture of a forged IRS 1099-MISC form purportedly issued by “Playboy Asia” to “Nikki” indicating that she had received \$142,093 in income. VICTIM 5 asked **ANTOINE**, “you have sex with the guy or producer for the audition?” and **ANTOINE** responds “yah.” VICTIM 5 provided **ANTOINE** with her full name, date of birth, and address in Kansas so he could prepare the contract in advance.

15. On or about May 26, 2015, VICTIM 5 traveled from Kansas to **ANTOINE**'s residence in Raymore, Missouri for the sexual activity.

16. On or about May 26, 2015, at **ANTOINE**'s direction, VICTIM 5 entered into a "Model Release and Grant of Rights" contract with **ANTOINE** (as "Chris Campbell") which conveyed and contracted the use of her rights of publicity and likeness in exchange for the false and fraudulent pretenses, representations, and promises that the producer would pay to VICTIM 5 the "base compensation" of \$2,000 and an additional \$12,000 for upon the scheduling of the shoot. On or about this same date, at **ANTOINE**'s direction, VICTIM 5 signed a "Confidentiality Agreement" between her and "Playboy Asia."

17. On or about May 26, 2015, **ANTOINE** produced and retained images and video recordings of his sexual activity with VICTIM 5.

18. On or about October 30, 2015, **ANTOINE**, as "Nikki," sent a series of messages via Facebook to the then-boyfriend of VICTIM 5, who resided in Kansas. **ANTOINE** informed VICTIM 5's boyfriend "she does porn" and suggesting that was how she was able to pay for her car.

19. On or about October 30, 2015, **ANTOINE**, as "Nikki," sent images of VICTIM 5 engaged in sexual activity with **ANTOINE** to VICTIM 5's boyfriend in Kansas. When VICTIM 5's boyfriend responded to **ANTOINE** that "you are distributing unwanted pornographic material to me" and it "takes consent to send pictures like that," **ANTOINE** replied, "lol, not when she signs a release, i could post them on the front page of the KC Star if i wanted." **ANTOINE** further wrote, "All you're gonna be known is as the dude who has a porn star girlfriend."

20. On April 1, 2016, I interviewed **ANTOINE** at the Jackson County Jail. **ANTOINE** stated he had relationships with all of the women outside of the sexual encounters. When asked

why he had the girls sign contracts, **ANTOINE** stated he did not know what I was talking about. **ANTOINE** then stated there is an element of risk involved and he has friends who have been accused of rape. **ANTOINE** stated he never promised the girls any money, and denied being “Nikki Hoffman.” **ANTOINE** stated he had the girls sign a “18 U.S.C. 2257 form,” which stated that the victims are old enough to have sex and consented to being videotaped. **ANTOINE** had them sign these contracts so he was protected against accusations of rape or so they could not claim they were drugged. During this interview, **ANTOINE** was told not to have any further contact with any of the women.

ANTOINE’s Recent Obstruction of Justice

21. **ANTOINE** was released early from custody on September 10, 2016. Since that time, he has actively worked to obstruct the due administration of justice in the course of this ongoing investigation by the FBI and RPD.

22. **ANTOINE** has been on explicit notice since I spoke with him on April 1, 2016, that he was under investigation by the FBI relating to this ongoing fraud scheme. I am also aware that Det. Shepard previously spoke with **ANTOINE** on January 11, 2016, relating to this ongoing investigation.

23. Soon after **ANTOINE** was released from custody, he contacted me on September 13, 2016, asking me several questions as to the status of this federal investigation. **ANTOINE** further advised me that his attorney had reviewed the search warrants prepared by the state detective and that his attorney found issues with them. **ANTOINE** further asked me about his personal items that were seized in this investigation, and I advised him that they are considered evidence. I again informed **ANTOINE** to not have any further contact with any of the women involved in this case.

24. On September 16, 2016, I was contacted by one of the victims I had previously interviewed. This victim informed me that **ANTOINE** had contacted her via “Snapchat,” which I know to be a mobile application which allows users to send images and videos to one another. This victim expressed to me that she was surprised that **ANTOINE** was already out of jail and felt uncomfortable upon receiving the unsolicited snapchats.

25. On September 27, 2016, **ANTOINE** contacted Det. Shepard with the RPD. **ANTOINE** advised Det. Shepard that he had spoken with me, and told Det. Shepard that he should be able to get his equipment seized by the RPD back because I said that the FBI was not pursuing this matter any further. **ANTOINE** further advised Det. Shepard that his “attorney” had reviewed the search warrant and told **ANTOINE** it was “improper” and **ANTOINE**’s equipment should not have been seized. **ANTOINE** provided the name of a specific Kansas City criminal defense attorney to Det. Shepard as the individual that was representing **ANTOINE**.

26. On September 28, 2016, I spoke with this Kansas City criminal defense attorney, who advised me that he does not currently have an attorney-client relationship with **ANTOINE**, had not spoken with him in years, and had not recently advised or consulted with **ANTOINE** on any current or pending criminal matters.

27. In the course of this investigation, we have developed information that **ANTOINE** may have created and used a fictitious email account whereby he was impersonating this specific Kansas City criminal defense attorney. When asked whether this purported email account was one used or created by this Kansas City criminal defense attorney, this attorney denied using that particular account. The attorney also checked his computer and found no record of that specific email account.

Criminal Statutes

28. The crime of online enticement for prostitution or criminal sexual activity is found under 18 U.S.C. § 2422(a), which states:

Whoever knowingly persuades, induces, entices, or coerces any individual to travel in interstate or foreign commerce, or in any Territory or Possession of the United States, to engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, or attempts to do so.


29. Further, **ANTOINE** persuaded, induced, enticed, and coerced one of these victims from the state of Kansas to travel to Missouri (in interstate or foreign commerce) to engage in various acts with him for which “any person (specifically, **ANTOINE**) can be charged with a criminal offense,” namely, the following crimes prohibited in the state of Missouri: rape in the second degree (MO. REV. STAT. § 566.031), sodomy in the second degree (MO. REV. STAT. § 566.061), and promoting obscenity (MO. REV. STAT. § 573.020(1)).

30. The crime of obstruction of the due administration of justice is found under 18 U.S.C. § 1503(a), which states:

Whoever corruptly, or by threats or force, or by any threatening letter or communication...endeavors to influence, obstruct, or impede, the due administration of justice.

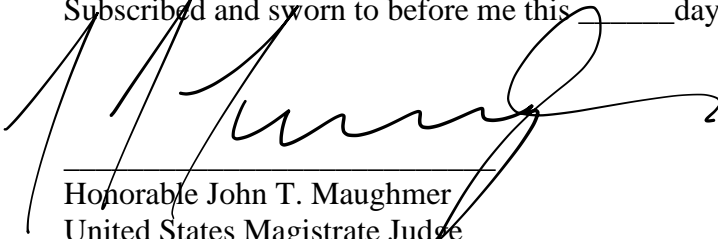
Background of the Affiant

31. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed since November 2007. I am currently assigned to the Violent Crimes Squad and investigate bank robberies, kidnappings and other violent crimes. Prior to that, I was assigned to the Domestic Terrorism Squad where I conducted investigations related to extremist criminal behavior and investigated a wide variety of criminal violations to include but not limited to sovereign citizen fraud investigations.



Special Agent Trisha DeWet
Federal Bureau of Investigation

Subscribed and sworn to before me this **6th** day of October 2016.



Honorable John T. Maughmer
United States Magistrate Judge
Western District of Missouri