

REDACTED PURSUANT TO THE E-GOVERNMENT ACT OF 2002

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)
)
 v.)
)
 JUSTIN DEONTA STROM,)
 a.k.a. "Jae," "Jae Dee," "J-Dirt,")
)
 DONYEL PIER DOVE,)
 a.k.a. "Bleck," "Bleak," "Bleake,")
)
 MICHAEL TAVON JEFFERIES,)
 a.k.a. "Loc,")
)
 HENOCK SOLOMON GHILE,)
 a.k.a. "Knocks," "Knox,")
)
 Defendants.)

CASE NO. 1:12mj172

UNDER SEAL (Local Crim. R. 49(B))

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANTS

I, Jeffrey F. Johannes, a Special Agent of the Federal Bureau of Investigation (FBI), Northern Virginia Resident Agency of the Washington Field Office, being duly sworn, depose and state as follows:

Introduction

1. I have been a Special Agent with the FBI since January 2003. I am currently assigned to investigations relating to, among other things, crimes against children, including the sex trafficking of children and prostitution investigations. As a federal agent, I am authorized to investigate violations of the laws of the United States and am a law enforcement officer with authority to execute warrants issued under the authority of the United States.

2. This affidavit is submitted in support of a criminal complaint and arrest warrants charging that between in and around April 2009 and in and around March 2012, in the Eastern

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District of Virginia, JUSTIN STROM, also known as “Jae,” “Jae Dee,” and “J-Dirt,” DONYEL DOVE, also known as “Bleek,” MICHAEL TAVON JEFFERIES also known as “Loc,” and HENOCK GHILE, also known as “Knocks,” did knowingly, in or affecting interstate commerce, conspire to transport a juvenile to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1594.

3. The facts and information contained in this affidavit are based upon my training and experience, participation in criminal and administrative investigations, personal knowledge and observations during the course of this investigation, as well as the observations of other agents and law enforcement officers involved in this investigation. All observations not personally made by me were relayed to me by the individuals who made them or are based on my review of records, documents, and other physical evidence obtained during the course of this investigation. This affidavit contains information necessary to support probable cause. It is not intended to include each and every fact and matter observed by me or known to the United States.

The Enterprise

4. STROM, DOVE, JEFFERIES, and GHILE are associates of the Underground Gangster Crips (UGC), which is a Crips “set” based in Fairfax County, Virginia.

5. The Crips originated in Los Angeles, California in the late 1960s to early 1970s. Since that time, the gang has spread throughout the United States and splintered into various sets. UGC, a nationally recognized set of the Crips, is active in the District of Columbia, Maryland, and Virginia.

6. Members of the Crips, and more specifically UGC within the Eastern District of Virginia, engage in violent criminal activity, including attempted murders, assaults, rapes,

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robberies, thefts, narcotics distribution, and obstruction of justice by threatening witnesses. UGC members and their associates are required to commit acts of violence in order to obtain and/or maintain membership with the gang. Additionally, UGC members commit acts of violence in order to enhance their reputation within the gang or defend the honor and name of the gang. UGC members also attack rival gang members and civilians in order to assert territorial dominance and fear and to further the goals of the enterprise.

7. The Fairfax County Police Department's Gang Investigations Unit has investigated several crimes committed by members of the criminal organization in furtherance of the goals of the enterprise:

- a. On December 19, 2005, FCPD investigated the rape of a 15-year-old female. Four members of UGC sexually assaulted a juvenile female in her home and then stole items from the residence. The gang members admitted the allegations.
- b. On January 7, 2006, FCPD investigated the armed robbery of a taxi cab driver. The suspects in the robbery were known UGC gang members.
- c. On December 28, 2006, FCPD investigated the rape of a sixteen year old female at the Springfield Mall. Members of UGC abducted and raped the juvenile female at the mall.
- d. On May 1, 2007, FCPD investigated the strong-arm robbery of a male. The suspects were identified as members of UGC.

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8. In addition to violent acts, UGC gang members engage in criminal racketeering activities in order to fund their enterprise. These activities include prostitution and sales of narcotics and firearms.

The Investigation

9. The FBI has received information that a number of Crips sets throughout the United States are engaging in sex trafficking as a means of making money.

10. In November 2011, the Fairfax County Police Department (FCPD), in conjunction with the FBI, formally launched an investigation into the prostitution enterprise run by UGC.

11. STROM is a known leader of UGC within Fairfax County.

12. During the course of the investigation into STROM and other UGC associates, VICTIM 1 told investigators that in 2009, when she was 16 years old, STROM approached her at a Metro station and told her that she was pretty. STROM told VICTIM 1 that she could make a lot of money by having sex with men for money. VICTIM 1 was flattered and told STROM that she was interested. STROM told VICTIM 1 that he "needed to see if it was good first," and STROM and VICTIM 1 had sex in the woods behind the Metro station.

13. In the following days, STROM introduced VICTIM 1 to another female. This female told VICTIM 1 that the organization would receive \$50 for vaginal sex and \$20 for oral sex, and that VICTIM 1 would receive half of the proceeds.

14. VICTIM 1 stated that she engaged in prostitution in Arlington County, the City of Alexandria, and Fairfax County, all within the Eastern District of Virginia, for STROM during the spring and summer of 2009. VICTIM 1 also recalled being transported from the Commonwealth of Virginia into Maryland for the purposes of prostitution on two separate occasions. STROM also provided VICTIM 1 with condoms, typically Trojan brand.

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15. During the period in which VICTIM 1 was prostituted by the enterprise, she received illegal narcotics from both STROM and another UGC associate, known to investigators as DOVE. She was provided with marijuana, cocaine, and ecstasy before and after she prostituted. VICTIM 1 was also given alcohol.

16. STROM and DOVE rented hotel rooms where VICTIM 1 slept. VICTIM 1 stated that most of the money she earned as a prostitute went to STROM and DOVE.

17. When VICTIM 1 stated that she no longer wished to participate, VICTIM 1 said that STROM choked her and threatened her with additional violence. STROM also told VICTIM 1 that he was a member of the Underground Gangster Crips. Much of the information provided by VICTIM 1 was corroborated. I have not located any material that contradicts the information provided by VICTIM 1.

18. M.W. is 17 years old. M.W. appears to work both as a prostitute for STROM and in recruiting other juveniles for sex trafficking by STROM.

19. On November 17, 2011, M.W. told a school staff member that she was hanging out with a man named "Jae" who is a pimp. M.W. stated that "Jae" gives her money for sexual favors that she provides to other people. She was not sure what to do.

20. The following day, investigators spoke with M.W. She told investigators that she does not need help, was not in danger, and is living the life she chose.

21. Investigators located advertisements on M.W.'s laptop that were posted on Craigslist.com and Backpage.com. These advertisements depict scantily clad young women and state among other things, "I'm fun, sexy, n down to have a good time... I love what I do and so will you."

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22. Investigators obtained internet protocol (IP) addresses utilized to post similar advertisements under the same user name. The three IP addresses returned to: [REDACTED], Fairfax Station, Virginia, M.W.'s residence; [REDACTED], Lorton, Virginia, STROM's residence; and [REDACTED], Woodbridge, Virginia, JEFFERIES's residence.

23. Investigators also obtained the street address listed to register one of the Backpage.com accounts associated with these advertisements. This address is M.W.'s former address.

24. Advertisements were paid for using a prepaid credit card from GreenDot. Investigators learned that the prepaid credit card was purchased from the 7-11 store located at 7907 Rolling Road, Springfield, Virginia.

25. Surveillance footage shows DOVE purchasing the credit card.

26. One Backpage.com advertisement was listed in JEFFRIES's name. The account used to post this advertisement returns to [REDACTED], Woodbridge, Virginia, JEFFRIES's address.

27. M.W. ran away from home on December 3, 2011. Investigators obtained location information for one of the phones used by M.W. during this period when she was on the run. Location data showed that the phone was used in Virginia, Maryland, the District of Colombia, and Atlantic City, New Jersey.

28. Location information showed a high concentration of phone calls in the vicinity of 700 North Washington Street, Alexandria, Virginia. Investigators discovered a Travelodge Motel at this location. The motel manager identified M.W. and JEFFERIES as guests at the motel. JEFFERIES's name and identification were used to rent the motel room.

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29. Location information showed M.W.'s phone in an area known to be frequented for the purposes of prostitution in Alexandria, Virginia during the same aforementioned time period.

30. Location information also showed a high concentration of phone calls in the vicinity of 1101 Pacific Avenue, Atlantic City, New Jersey. Investigators discovered a Travelodge Motel at this location. JEFFERIES's name and identification were used to rent the motel room.

31. Investigators reviewed surveillance footage from the motel, which showed JEFFERIES, STROM, and M.W.

32. Location information also showed that the phone was in an area of Atlantic City, New Jersey, which is known to investigators with the Atlantic City Police Department to be frequented for the purposes of prostitution.

33. Location information also showed a concentration of phone calls and cellular activity in the vicinity of [REDACTED], Woodbridge, Virginia, JEFFRIES's residence.

34. On December 26, 2011, law enforcement officers found M.W. at an Alexandria motel in the company of STROM. She told investigators that STROM was her boyfriend. (M.W.'s Facebook page shows her "relationship status" as being in a relationship with Facebook profile "Jae Dee." "Jae Dee's" profile picture is a photograph of STROM.)

35. M.W. was arrested on an outstanding, and unrelated, juvenile detention order from Fairfax County.

36. A search of M.W.'s phone, seized at the time of her arrest, disclosed additional information related to the advertisements referenced above, along with text messages discussing

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the payment of money. There were also text messages between M.W. and STROM discussing M.W.'s efforts to recruit additional girls.

37. On December 26, 2011, M.W. reported to staff members at the Fairfax County Juvenile Detention Center that she was a Crip.

38. VICTIM 2, who is 17 years old, also provided information on prostitution activity to law enforcement officers. Much of the information provided by VICTIM 2 was corroborated. I have not located any material that contradicts the information provided by VICTIM 2.

39. VICTIM 2 was approached by M.W. while at school. M.W. told VICTIM 2 that she was a confident pretty woman and told her she could make lots of money.

40. VICTIM 2 later corresponded with M.W. via Facebook on November 7 and 8, 2011. The message reads in part:

[M.W.]: Lol u tryna make sum money n shyt?

[VICTIM 2]: howww

[M.W.]: Trickin.. Like u get 50% n u get all da drugs n shyt uwwant basically.

[VICTIM 2]: escorting type shit? as long as I don't have to sleep with them, but ill go out and shit just hit me up with the details

[M.W.]: Leme give u mi mans number hit him up tlk to him n shyt .
But iitee 2023157722

41. VICTIM 2 stated that she called this phone number and spoke with STROM. This phone number was listed in VICTIM 2's cell phone address book as "Jae." "Jae" is a nickname for STROM.

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42. VICTIM 2 later met up with a female known to investigators as N.M. N.M. explained the workings of the enterprise. VICTIM 2 was then taken to STROM's residence located at [REDACTED], Lorton, Virginia. This occurred in the end of November 2011.

43. VICTIM 2 later engaged in prostitution for STROM. Clients paid \$100 to engage in intercourse with VICTIM 2, according to VICTIM 2.

44. VICTIM 2 stated that UGC members took nude photographs of her inside STROM's residence using various devices to include cellular telephones and digital cameras.

45. VICTIM 2 recalls STROM's house as the main location for the enterprise. Within STROM's house, VICTIM 2 observed computers and cellular telephones used to recruit females into the prostitution enterprise, advertise prostitution services over the internet, and maintain records, logs, and lists relating to the operation.

46. VICTIM 2 knows that the enterprise conducted "in-calls," in which the clients entered the basement of STROM's house and engaged in sexual intercourse in exchange for money.

47. VICTIM 2 stated that STROM identified himself and his associates as members of the Crips. "Loc" told her he was an Underground Gangster Crip and demonstrated the "Crip handshake," which gang members use to greet and identify each other. Additionally, "Loc" demonstrated the "Crip walk," which is a dance used by gang members to represent and show pride in their gang membership.

48. VICTIM 2 identified "Loc" as JEFFERIES. VICTIM 2 also identified "Knocks" and "Chris" as being involved in the enterprise. "Knocks" is GHILE's nickname and "CHRIS" refers to CHRISTOPHER SYLVIA.

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49. VICTIM 2 stated that JEFFERIES and DOVE accompanied the girls when they prostituted for the enterprise. JEFFERIES and DOVE acted as “bodyguards” and “drivers” for the girls. JEFFERIES and DOVE received a portion of the profits earned through prostitution. GHILE and SYLVIA provided transportation for the girls to and from their homes to the locations where they prostituted.

50. VICTIM 2 stated that STROM instructed M.W. to recruit additional girls for prostitution from the school.

51. VICTIM 2 stated that JEFFERIES carried a firearm while conducting business for the enterprise. VICTIM 2 also recalled STROM and other co-conspirators discussed the acquisition of additional firearms. They specifically named M.I.W. as a person from whom they could obtain the weapons.

52. In December 2011, investigators obtained consent from M.I.W. to review the contents of her phone. Investigators observed text messages containing conversations between M.I.W. and unidentified subjects in which M.I.W. solicited the sale of firearms she alleged to have in her possession.

53. VICTIM 3 also provided information to investigators. Much of the information provided by VICTIM 3 was corroborated. I have not located any material that contradicts the information provided by VICTIM 3.

54. VICTIM 3 said that she dated STROM for approximately three months between April and July 2009. During that time, she observed STROM prostitute four to five females. One girl was 17 years old.

55. VICTIM 3 stated that STROM was very violent and physically assaulted her on several occasions.

56. On June 4, 2009, STROM directed VICTIM 3 to purchase a firearm for him and a subject he identified as his cousin. STROM told VICTIM 3 that neither he nor his "cousin" could purchase the firearm because they were convicted felons. VICTIM 3 purchased a .45 semi-automatic handgun and gave it to STROM. ATF records corroborate the purchase.

57. During the months of January and February 2012, investigators observed M.W. and other females entering and exiting STROM's residence.

58. On February 14, 2012, M.W., STROM, VICTIM 4, and another female were observed in Alexandria, Virginia.

59. M.W., VICTIM 4, and the other female were standing on the side of a street, and appeared to be soliciting the men walking past. STROM remained in a car parked nearby. After approximately ten minutes, M.W., VICTIM 4, and the other female entered the car and left the area. Officers from the Alexandria Police Department stopped the vehicle and arrested M.W. on an outstanding warrant for a probation violation from the Fairfax County Juvenile and Domestic Relations District Court.

60. VICTIM 4 provided information in relation to prostitution activities. VICTIM 4 was 18 years old in February 2012.

61. VICTIM 4 stated that in late January or early February 2012, M.W., using the profile name "zeebaby," contacted VICTIM 4, who was using the profile name "superstar93," through the website DateHookUp.com. M.W. told VICTIM 4 that she would like to get to know her better and provided a phone number, 202-257-5818, for VICTIM 4 to call M.W.

62. Investigators executed a search warrant for the DateHookUp.com profile "zeebaby." These records show the conversation with "superstar93," referenced above, as well as numerous similar conversations by "zeebaby" with other females.

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63. M.W. and VICTIM 4 subsequently corresponded exclusively by phone calls and text messages. During one conversation, M.W. told VICTIM 4 that she was pretty and asked her if she wanted to make some money. VICTIM 4 expressed her interest in making money. VICTIM 4 met M.W. and STROM in person at the Dunn Loring Metro station on February 10, 2012.

64. M.W. told VICTIM 4 that they were going to “turn tricks” to make some money. VICTIM 4 was uncomfortable, but felt compelled to participate. VICTIM 4 drove M.W. and STROM to an apartment complex in or around Arlington County. M.W. provided VICTIM 4 with condoms and explained that they would charge their customers \$30 for ten minutes of vaginal intercourse.

65. M.W. and VICTIM 4 walked door-to-door in the apartment complex soliciting men to pay them for sexual intercourse. M.W. and VICTIM 4 had sexual intercourse with approximately 10 to 15 customers. M.W. received all of the cash and recorded the transactions.

66. Later, M.W. and VICTIM 4 met with STROM near the apartment complex. M.W. gave most of the cash she received from the customers to STROM. VICTIM 4 received approximately \$90 of the proceeds. M.W., STROM, and VICTIM 4 then purchased narcotics and returned to STROM’s residence, where they used marijuana, PCP, and ecstasy, and engaged in sexual intercourse together.

67. Over the next few days, M.W. contacted VICTIM 4 and encouraged her to come out with her again. VICTIM 4 declined. M.W. then told VICTIM 4 that she needed to recover her iPod, which she left in VICTIM 4’s car. M.W. stated that her “whole life” was on the iPod and it was very important.

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68. On February 14, 2012, VICTIM 4 met with M.W. and STROM to return the iPod. However, M.W. and STROM told VICTIM 4 to drive them and another female to Alexandria. VICTIM 4 complied. STROM said that he intended to purchase PCP, provide it to VICTIM 4, and that VICTIM 4 would be responsible for selling it to customers and returning the proceeds to STROM. The other female in the car intended to prostitute herself.

69. Much of the information provided by VICTIM 4 was corroborated. I have not located any material that contradicts the information provided by VICTIM 4.

70. M.W. and VICTIM 4 were arrested by Alexandria City Police on February 14, 2012. Law enforcement officers seized a cellular telephone, with the number 202-257-5818, and an iPod from the vehicle. A search warrant was executed on the iPod. Investigators located the Facebook account "Rain Smith," numerous conversations with suspected prostitution victims, and contact information for SYLVIA, STROM, GHILE, and DOVE.

71. Investigators obtained more than 800 messages from the "Rain Smith" Facebook account to females using similar language as discussed above.

72. VICTIM 5 told law enforcement officers that approximately seven months ago, when she was 17 years old, she was solicited on Facebook by "Rain Smith." VICTIM 5 stated that N.M. picked VICTIM 5 up from her home. VICTIM 5 positively identified a photograph of N.M. N.M. drove VICTIM 5 back to a location where they met with STROM, GHILE, and DOVE. VICTIM 5 positively identified photographs of STROM, GHILE, and DOVE.

73. VICTIM 5 stated that the others explained the prostitution operation and what she would be required to do. VICTIM 5 stated she was hesitant and told them that she did not wish to participate. N.M. went out into the neighborhood along with DOVE for prostitution.

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VICTIM 5 remained in the vehicle with STROM and GHILE. Sometime during this time period, VICTIM 5 informed them she was only 17 years of age.

74. STROM asked VICTIM 5 to have sex with him for money. STROM later told VICTIM 5 that she had to have intercourse with STROM and GHILE as an initiation, like a "gang initiation." STROM then took out what VICTIM 5 believed to be powder cocaine. STROM told VICTIM 5 to ingest the cocaine. VICTIM 5 told STROM that she did not do cocaine and did not wish to start. VICTIM 5 stated that she slapped STROM's hand out of the way, causing the powder to fall all over STROM's lap. STROM struck VICTIM 5, and slammed her head against the window of the vehicle. VICTIM 5 stated she said that she sustained a cut above her eye that later required medical treatment and stitches at a local hospital. Investigators observed a scar above her right eye that appeared to be permanent.

75. VICTIM 5 stated that she was forced to ingest the cocaine. STROM then took her from the car around the corner of an apartment building, while brandishing a knife. VICTIM 5 stated that she felt very sick. VICTIM 5 stated that STROM told her to perform oral sex on him while holding a knife to her neck. VICTIM 5 told STROM no, but STROM then cut her across the left forearm with the knife. Investigators observed a scar on her left forearm consistent with a cut from a sharp object. VICTIM 5 then complied with STROM's order to perform oral sex. Before STROM ejaculated he told her to stand up and bend over so that he could finish by having vaginal sex with her.

76. VICTIM 5 was then taken into an apartment where she was forced to engage in vaginal intercourse against protest with fourteen unknown males. She recalls STROM being present for the duration and collecting approximately \$1,000 afterwards from the men.

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77. DOVE and N.M. drove VICTIM 5 back to her house early in the morning. VICTIM 5 stated that DOVE and N.M. told her that she was a “whore” and a “slut,” and that she “got what she had coming.” DOVE and N.M. dropped VICTIM 5 off at her house and told her that if she spoke of the events that they would come back and kill her.

78. Much of the information provided by VICTIM 5 was corroborated. I have not located any material that contradicts the information provided by VICTIM 5.

79. In late February 2012, investigators spoke with WITNESS 1. WITNESS 1 is a UGC associate who admitted his involvement in the prostitution enterprise. WITNESS 1 stated that STROM and his associates have been involved in a prostitution enterprise for more than five years.

80. WITNESS 1 stated that STROM uses computers within his residence to access social media internet sites (*e.g.*, Facebook and MySpace) for the purposes of creating false accounts in an effort to recruit young girls into his prostitution operation.

81. WITNESS 1 said that STROM enlisted the services of GHILE to transport girls from various locations to the neighborhoods used for prostitution.

82. WITNESS 1 said that STROM also worked with DOVE and JEFFERIES in transporting and prostituting girls.

83. WITNESS 1 recalled a female who was the “HBIC” (Head Bitch in Charge, a term given to the most senior prostitute and the one in charge of managing all the other girls) who went by the name “Z.” “Z” is known to investigators to be M.W. WITNESS 1 said that “Z” was responsible for recruiting and managing the false Facebook profiles.

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84. WITNESS 1 also stated that M.W. maintained money earned from the prostitution enterprise at her house. VICTIM 2 provided a similar account, stating that M.W. hid money earned by the enterprise in her residence behind picture frames.

85. WITNESS 1 said that the conspirators used their cell phones and computers to communicate with each other regarding the operation.

86. WITNESS 1 stated that once STROM contacted a girl online who expressed interest in working for STROM as a prostitute, STROM sent GHILE to pick up the girl. GHILE drove his black Toyota Four-Runner SUV to transport the girls. STROM provided GHILE money derived from the prostitution business to pay for gas. GHILE picked up the girl and brought her back to STROM's residence on [REDACTED] in Lorton, Virginia.

87. WITNESS 1 stated that once GHILE brought the girl back to STROM's house, STROM had sex with the girl to try her out. The prostitutes stayed at STROM's house for approximately one week and then returned home. WITNESS 1 stated that GHILE sometimes drove the prostitutes back home. GHILE was allowed to have sex for free with the girls he transported.

88. WITNESS 1 stated that he and other UGC members and associates often commented on how STROM recruited young girls and employed them as prostitutes. WITNESS 1 recalled on one occasion that he and other UGC members asked STROM why he "messes" with young girls.

89. WITNESS 1 stated that DOVE walked with some of the prostitutes and sold narcotics at the same time. DOVE was assisted by a female who was subsequently identified as N.M.

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90. WITNESS 1 stated that JEFFERIES served as a bodyguard for STROM and the prostitutes. JEFFERIES also held the money derived from the prostitution business and eventually turned it over to STROM. STROM paid JEFFRIES for his assistance in the prostitution business.

91. Much of the information provided by WITNESS 1 was corroborated. However, it appears that WITNESS 1 may have minimized his role in the organization.

92. On March 12, 2012, investigators interviewed WITNESS 2. WITNESS 2 stated that STROM and his associates, specifically SYLVIA and GHILE, were involved in prostituting females from February 2011 until August 2011.

93. WITNESS 2 recalled that STROM solicited females using online social networking sites, specifically Facebook. SYLVIA or GHILE provided the girls with transportation.

94. According to WITNESS 2, STROM prostituted the females in Fairfax County and the City of Alexandria. She specifically recalled three juvenile females.

95. WITNESS 2 said that STROM often spoke of obtaining firearms. She knew SYLVIA to carry a firearm with him, which he kept under the driver's seat of his vehicle while transporting the females.

96. Much of the information provided by WITNESS 2 was corroborated. I have not located any material that contradicts the information provided by WITNESS 2.

97. On March 7, 2012, investigators interviewed WITNESS 3. WITNESS 3 advised that she knew GHILE stole a firearm from inside a vehicle. GHILE later transferred possession of that firearm to SYLVIA. SYLVIA maintained the firearm, but then told WITNESS 3 that he disposed of the stolen gun somewhere in the woods.

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98. Much of the information provided by WITNESS 3 was corroborated. I have not located any material that contradicts the information provided by WITNESS 3.

99. Investigators located a report filed with FCPD from December 31, 2010 where a Beretta .380 semi-automatic handgun was stolen from a vehicle. SYLVIA was listed as a suspect in that investigation.

100. VICTIM 6 stated that in mid-December 2011, while she was standing at a Metro bus stop in the City of Alexandria, she was approached by a juvenile female known to VICTIM 6 as M.W. VICTIM 6 was an adult at the time.

101. M.W. asked VICTIM 6 if she had a cigarette. M.W. then asked VICTIM 6 if she wanted a job. M.W. explained that the job involved VICTIM 6 having sex with men for money. M.W. said that VICTIM 6 would keep half of the earnings and the other half would go to M.W. and the pimp, whom M.W. identified as "Jae."

102. "Jae" was also present at the bus stop. VICTIM 6 positively identified "Jae" as STROM.

103. Approximately one week later VICTIM 6 contacted M.W. and stated that she might be interested in the job. VICTIM 6 subsequently met with M.W. and STROM and went to the Chiriagua neighborhood of Alexandria.

104. M.W. told VICTIM 6 that they would go door-to-door soliciting men. They would charge \$40 for ten to fifteen minutes of vaginal sex. VICTIM 6 said that she was scared and uncomfortable, so M.W. said she could observe M.W. work.

105. The next day VICTIM 6 met up with STROM and M.W. and returned to the same neighborhood. This time, VICTIM 6 also engaged in sex with men for money. M.W. held all of the money and reported back to STROM. VICTIM 6 and M.W. mostly worked door-to-door,

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but M.W. also passed out a phone number, and some clients called to request their services. At the end of the night, M.W. divided the money and provided VICTIM 6 with her earnings.

106. VICTIM 6 stated that M.W. and STROM used two main methods of recruiting—Facebook and approaching girls on the street. VICTIM 6 stated that two girls regularly worked for the enterprise during this period. One girl told VICTIM 6 she was 17 years old. VICTIM 6 believed the other girl to be approximately 18 years old.

107. VICTIM 6 stated that STROM never walked with the girls to protect them, but on some occasions “Bleck” would walk with them. VICTIM 6 positively identified “Bleck” as DOVE.

108. VICTIM 6 said that DOVE was always with “his girl,” who VICTIM 6 positively identified as N.M. N.M. also worked as a prostitute.

109. Much of the information provided by VICTIM 6 was corroborated. I have not located any material that contradicts the information provided by VICTIM 6.

110. In the summer of 2011, VICTIM 7 was 16 years old. VICTIM 7 received a Facebook “friend request” from “Rain Smith.” “Rain Smith” told VICTIM 7 that she was very pretty and asked her if she wanted to make some money. VICTIM 7 stated that she needed money and replied that she was interested.

111. VICTIM 7 provided her cell phone number and subsequently communicated with “Rain Smith” via text message.

112. “Rain Smith” arranged to pick up VICTIM 7 at her house. VICTIM 7 stated that she was not clear on what exactly she would be doing and had suspicions, so she asked her friend, who was 17 years old, to come with her. VICTIM 7 stated that an individual named

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“Knocks” arrived in a black or dark green Toyota 4Runner, picked them up, and transported them to the Springfield Metro station. VICTIM 7 positively identified “Knocks” as GHILE.

113. VICTIM 7 subsequently met with “Jae,” whom VICTIM 7 positively identified as STROM. GHILE then drove all of them to the Commerce Street area of Springfield, Virginia. VICTIM 7 told STROM that she was not interested. STROM told VICTIM 7 that she could just “watch and learn.” They arrived at a shopping center near Commerce Street where they met up with two other girls. STROM directed them to a store to purchase condoms and then sent them to engage in prostitution activities.

114. VICTIM 7 stated that she remained in GHILE’s vehicle with STROM, GHILE, an unknown black male, and her friend. The car was parked so they could watch the girls. VICTIM 7 stated that she saw men approach the girls as they walked through the neighborhood. The girls then went into apartments or townhouses to perform sex acts. While in the car, STROM repeatedly asked VICTIM 7 to prostitute herself. STROM also told her that “like a gang initiation” she needed to have sex with the men in the car. STROM also solicited VICTIM 7’s 17-year-old friend, VICTIM 8, to prostitute herself as well. STROM also provided cocaine to VICTIM 7 while she was in the car. VICTIM 7 admitted to inhaling “one line” of powder cocaine. STROM said that he could provide VICTIM 7 with other narcotics.

115. VICTIM 7 stated that when the prostitutes finished, they returned to GHILE’s vehicle and gave their money to STROM. STROM then gave the prostitutes their portion of the proceeds. VICTIM 7 stated that she asked STROM why he got a portion of the money, and STROM told her that it was for providing protection.

116. VICTIM 7 stated that GHILE drove VICTIM 7 and her friend back to where he picked them up.

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117. VICTIM 8 positively identified STROM. VICTIM 8 also positively identified GHILE as the person who picked her up with VICTIM 7.

118. VICTIM 8 stated they met up with GHILE and STROM again a couple days later. They consumed alcohol and drugs brought by GHILE, STROM, and an unknown male. They told VICTIM 8 that they had to “try it out to see if it was good” before they could engage in sex in exchange for money. VICTIM 8 stated that she told them that she was only 16 years old and that VICTIM 7 was only 17 years old. The men replied that younger was better because they could make more money off young girls. VICTIM 8 and VICTIM 7 engaged in intercourse with all three males at separate times.

119. VICTIM 8 stated that on a subsequent date, GHILE was driving his Toyota 4Runner along with STROM and an unknown black male as passengers. GHILE drove the two juvenile females to an apartment complex near Commerce Street in Springfield, Virginia. There, VICTIM 7 and VICTIM 8 met with an unknown female that VICTIM 8 described as being pregnant. This person is known to investigators as WITNESS 2.

120. VICTIM 8 stated that WITNESS 2 was supposed to show the females the “ropes” (*i.e.*, how to engage in prostitution activities) according to STROM. VICTIM 8 said that she needed money to help support herself but didn’t want to engage in prostitution activities in that neighborhood. STROM, GHILE, and the unidentified male agreed to take her to a different neighborhood. VICTIM 8 believes the second neighborhood was somewhere in Alexandria.

121. VICTIM 8 stated that WITNESS 2 walked with the girls and held the money. VICTIM 8 was upset that WITNESS 2 negotiated the price down to \$15, but VICTIM 8 refused to accept the price. VICTIM 8 said that she charged a minimum of \$40 for ten (10) minutes of vaginal intercourse. VICTIM 8 had sex with three or four men. VICTIM 8 worked

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approximately three more times and engaged in sex for money approximately five to six times each day. VICTIM 8 also recalled another male, whom VICTIM 8 positively identified as DOVE, as being present and walking with the girls on at least one occasion.

122. Much of the information provided by VICTIM 8 was corroborated. I have not located any material that contradicts the information provided by VICTIM 8.

123. WITNESS 3 stated that “Jae” “friended” her on Facebook on December 11, 2010. WITNESS 3 positively identified “Jae” as STROM. WITNESS 3 traveled to Springfield to visit STROM at least once per week. Frequently, “Knocks,” positively identified as GHILE, drove STROM in a black SUV, possibly a Toyota 4Runner.

124. WITNESS 3 stated that she was aware of the prostitution enterprise. WITNESS 3 stated that STROM used Facebook to recruit prostitutes. STROM asked WITNESS 3 for the login and password information for her Facebook page, which she provided to him. WITNESS 3 stated that STROM also used the profiles “Rain Smith,” “Mimi Jackson,” and “Aaliyah Marie” to recruit girls.

125. WITNESS 3 stated that STROM searched Facebook for attractive young girls, and sent them messages telling them that they were pretty and asking if they would like to make some money. If the girls responded affirmatively, STROM would then text them using a cell phone. From there, GHILE would transport them all to two neighborhoods favored by him and his associates to engage in the prostitution enterprise—Chiriagua, and Commerce Street. STROM would then give the girls instructions to get out and walk.

126. WITNESS 3 recalled that STROM encouraged the girls to find apartments with multiple males inside to minimize walking in the open and maximize profit.

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127. WITNESS 3 stated that STROM and GHILE sat in the vehicle where they could maintain visual contact with the females. When the females finished, they brought the money back to STROM. GHILE or other associates received a portion of the money.

128. WITNESS 3 stated that STROM gave the girls money to purchase condoms. They most commonly purchased condoms from the 24 Mart located in Alexandria, Virginia. She recalled him purchasing LifeStyle brand condoms in silver or gray wrappers.

129. WITNESS 3 stated that STROM provided alcohol and drugs, including cocaine, marijuana, and ecstasy, to the girls.

130. WITNESS 3 stated that the girls charged \$40 for sex with male clients. WITNESS 3 said that STROM never asked her to prostitute herself, but that he asked her to walk with the girls while they were working as prostitutes. WITNESS 3 admitted to walking with the girls one time where she was also responsible for holding the money. WITNESS 3 said that she felt very uncomfortable and told STROM that she did not wish to do it anymore. She would typically stay in the car with STROM and whoever was driving.

131. WITNESS 3 recalled approximately six or seven different females who worked for STROM. WITNESS 3 specifically recalled three juveniles working for the prostitution organization.

132. Much of the information provided by WITNESS 3 was corroborated. I have not located any material that contradicts the information provided by WITNESS 3.

133. Investigators spoke with VICTIM 9, who was 17 years old in January 2012. VICTIM 9 stated that she met M.W. at the Fairfax County Juvenile Detention Center in January 2012. While inside the facility, M.W. told VICTIM 9 that she was involved in a prostitution enterprise and that VICTIM 9 could make a lot of money working for M.W.

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134. After VICTIM 9 was released from the Fairfax County Juvenile Detention Center, she was contacted by M.W. SYLVIA, STROM, M.W., and VICTIM 6 met VICTIM 9. SYLVIA transported all of them to Chiriagua.

135. VICTIM 9 stated that she engaged in prostitution on three separate dates. VICTIM 9 turned the money over to M.W., who would in turn give it to STROM. VICTIM 9 had to pay SYLVIA "gas money."

136. Much of the information provided by VICTIM 9 was corroborated. I have not located any material that contradicts the information provided by VICTIM 9.

137. Investigators spoke with VICTIM 10, who stated that "Rain Smith" contacted her on Facebook. "Rain Smith" told her that she was very attractive and asked if she wanted to make some easy money. VICTIM 10 told "Rain Smith" that she was only 17 years old, even though she was actually 16 years old at the time. "Rain Smith" told VICTIM 10 that she would have to dance naked and perform various other sex acts in exchange for money. "Rain Smith" additionally told her that VICTIM 10's age didn't matter and offered to arrange for someone to give VICTIM 10 a ride to the "work location."

138. Much of the information provided by VICTIM 10 was corroborated. I have not located any material that contradicts the information provided by VICTIM 10.

Conclusion

139. Based on the foregoing, I submit that there is probable cause to believe that between in and around April 2009 and in and around March 2012, in the Eastern District of Virginia, JUSTIN STROM, also known as "Jae," "Jae Dee," and "J-Dirt," DONYEL DOVE, also known as "Bleek," MICHAEL TAVON JEFFERIES, also known as "Loc," and HENOCK GHILE, also known as "Knocks," did knowingly, in or affecting interstate commerce, conspire

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to transport a juvenile to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1594.

Jeffrey Johannes
Special Agent, Federal Bureau of Investigation

Sworn to and subscribed to before me
this ____th day of March, 2012

The Honorable Ivan D. Davis
United States Magistrate Judge

Alexandria, Virginia