AO (Rev. 5/85) Criminal Complaint

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UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA

TAMPA DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

VS.

ANDREW BLANE FIELDS

CASE NUMBER	1	3	MJ	9	9	8	4	TGW
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I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From at least in or about April 2011 through at least in or about November 2012, in Hillsborough County, in the Middle District of Florida, defendant,

did engage in commercial sex trafficking by means of force and coercion and possess with intent to distribute and distribute federal controlled substances, namely Oxycodone, a Schedule II controlled substance,

in violation of Title 18, United States Code, Section 1591 and Title 21, United States Code, Section 841(a)(1). I further state that I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations, 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 William J. Williger

Sworn to before me and subscribed in my presence,

March 20, 2013

at

Tampa, Florida

THOMAS G. WILSON
United States Magistrate Judge

Name & Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, William J. Williger, having been duly sworn, depose and state as follows:

<u>Introduction</u>

- 1. I am a Special Agent with the United States Department of Homeland Security (DHS) Homeland Security Investigations (HSI) and have been since December of 2006. I am currently assigned to the Office of the Special Agent in Charge, Tampa, Florida. Before becoming a Special Agent, your Affiant served as a Staff Sergeant in the United States Marine Corps Reserve for approximately eleven years. During your Affiant's time in the United States Marine Corps Reserve, your Affiant served as a Platoon Sergeant and participated in combat operations in Operation Iraqi Freedom.
- 2. As a Special Agent with HSI, I am a federal law enforcement officer as described in 18 U.S.C. § 2510(7). I am responsible for investigating and enforcing violations of federal law, including Title 18 and Title 21 offenses. I have specifically investigated matters involving the exploitation and human trafficking of adults and minors, particularly in relation to violations 18 U.S.C. § 1591, which criminalizes commercial sex trafficking. I have made arrests and conducted searches pertaining to these types of investigations.
- 3. As a Special Agent, I have completed a twenty-six week academy, which certified me as a criminal investigator. I have also been directly involved in federal investigations and have assisted other agents in conducting investigations, including but not limited to joint, interagency investigations. In my investigative experience, I have conducted physical surveillance, executed search warrants, and reviewed recordings,

including recordings of individuals involved with human trafficking. I have interviewed witnesses, victims, and worked with cooperating individuals.

- 4. I have been assigned by HSI to the U.S. Department of Justice (DOJ)

 Clearwater Area Human Trafficking Task Force (CAHTTF), which is a local, state, and federal multi-agency task force devoted to combating human trafficking, which includes commercial sex trafficking. I have learned the following information in my official capacity, by first hand observations, as well as by receiving information from federal and local law enforcement in reference to the investigation of ANDREW BLANE FIELDS for violations of federal criminal law.
- 5. Your affiant submits this affidavit in support of a criminal complaint against ANDREW BLANE FIELDS for violations of federal law, namely, 18 U.S.C. § 1591 (commercial sex trafficking by force and coercion) and 21 U.S.C. § 841(a)(1) (possession with the intent to distribute and distribution of federal controlled substances. Because this affidavit is being submitted in support of a criminal complaint, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause that FIELDS has committed violations of the above-referenced statutes.

Background and Summary of Investigative Findings Relevant to Affidavit

6. This investigation initiated on April 21, 2011, when Homeland Security
Investigations (HSI) Special Agent in Charge (SAC) Tampa, the Clearwater Area
Human Trafficking Task Force (CAHTTF), and the Plant City Police Department (PCPD)
participated in an operation which focused on the recovery of domestic human
trafficking victims. The National Center for Missing and Exploited Children (NCMEC)

provided HSI SAC Tampa with an investigative lead regarding a possible juvenile sex trafficking victim. The lead came from the website Backpage.com, a classified advertising website that contains a section for listing "adult entertainment services" and specifically, listings for sex, which had a posting date of April 7, 2011.

- 7. At approximately 9:00 p.m. on April 21, 2011, an Undercover (UC) PCPD Detective called the telephone number listed on the NCMEC lead. The UC requested that the female advertised in the Backpage.com posting travel to a location which had been previously procured by PCPD and engage in sex acts in exchange for money with the UC. At approximately 9:40 p.m., the female arrived at the pre-arranged location in a black Honda Civic. The black Honda Civic was driven by an unidentified male and occupied by two females. The black Honda Civic bore a Florida license plate 053VDD and the vehicle identification number was 1HGEM22514L060230.
- 8. A surveillance team of Law Enforcement Officers (LEOS) in the parking lot observed a female exit the black Honda Civic. The female then walked to the predetermined apartment. Another team of LEOS observed the UC negotiate the fee for the female to engage in sex acts in exchange for money with the UC via a closed circuit video camera. Once the agreement had been reached, the female called her driver to inform him that an arrangement for sex acts in exchange for money had been made.
- 9. Following the exchange of money, the LEOS entered the room in which UC and the female were present. The LEOS were clearly marked with police placards and announced who they were and what their intentions were. The female was

detained. The team of LEOS that were positioned in the parking located and apprehended the driver and the second female.

- 10. Victim #1 was identified as the female in the apartment and the same person from the NCMEC lead. FIELDS was identified as the male driver. Victim #2 was identified as the additional female in FIELDS' vehicle.
- 11. FIELDS was arrested on State of Florida felony charges for deriving proceeds from prostitution. Victim #1 was released on her own recognizance and given a court date to appear for her prostitution charge. Victim #2 was released with no charges. Victim #1 was/is believed to have been under the age of 18 at the time. Both Victim #1 and Victim #2 were released into the custody of their respective parents. Both females were informed that additional interviews were to follow. As further detailed below, Victims #1 and #2 have subsequently been interviewed on multiple occasions. They have both provided information consistent with facts learned and corroborated by law enforcement during the investigation, including information provided by other witnesses and a review of available records. Therefore, both Victims #1 and #2 are considered to be reliable.
- 12. Information obtained from the interviews with Victim #1 and Victim #2 (detailed in the following section), and from other sources related to the on-going investigation indicate that:
- a. FIELDS recruited women for the purposes of engaging in commercial sex acts. FIELDS was actively advertising online, booking, and providing transportation for women to engage in commercial sex acts, and has been doing so in the Tampa, Florida, area since at least June 2008. FIELDS advertised women to engage in

commercial sex acts using magazines and internet postings on websites such as Backpage.com. FIELDS booked the appointments of the women prostituting for him through the use of his cell phones, and FIELDS transported women to engage in commercial sex acts through the use of his personal vehicle.

- b. FIELDS sold controlled substances, largely Oxycodone, to the women prostituting for him. FIELDS obtained the controlled substances through "doctor shopping" and buying pills that are prescribed to other individuals from those individuals. FIELDS sold the controlled substances on credit to the women prostituting for him when the women could not afford to purchase the controlled substances.
- c. FIELDS recorded the sales of controlled substances to the women prostituting for him, and tracked the debt that each woman accrued. FIELDS then forced and coerced the women to commit commercial sex acts to pay back the debt that the women owed him for controlled substances. Similarly, FIELDS recorded the payments the women paid toward the debt through the proceeds derived from commercial sex acts.

Basis for Probable Cause

- 13. Your Affiant interviewed Victim #1 on April 21, 2011; April 22, 2011; July16, 2012; July 17, 2012; and October 25, 2012.
- 14. Victim #1 stated that she was 19 years old at the time of her arrest with FIELDS on April 21, 2011. Your Affiant has corroborated this information by obtaining a copy of Victim #1's birth certificate. Victim #1 stated that she was 17 years old when she first met and began prostituting for FIELDS.

- 15. Victim #1 stated that at the time she met FIELDS, she was working as a stripper and as a prostitute and that FIELDS was a prostitution client. Following a commercial sexual encounter with FIELDS, he recruited Victim #1 to work for him. Victim #1 stated that FIELDS told her that he could post her advertisements for commercial sex and drive her to meet the clients. Additionally, FIELDS offered to allow Victim #1 to reside at his residence.
- 16. Victim #1 stated that she was in need of money and decided to accept FIELDS' offer. FIELDS had Victim #1 come to FIELDS' residence where, according to Victim #1, FIELDS took sexually explicit digital photographs of Victim #1, and using his home computer he used the photographs to create internet advertisements for commercial sex acts featuring Victim #1. FIELDS then purchased advertisements on websites such as Backpage.com.
- 17. Your Affiant corroborated this information in part by obtaining copies of several advertisements from Backpage.com featuring Victim #1 that were purchased with FIELDS' credit card using a Backpage.com account registered to FIELDS' home computer. Backpage.com, however, only retains copies of advertisements for one year. Therefore, your Affiant was unable to obtain a complete record of advertisements purchased by FIELDS featuring Victim #1 through the use of an administrative subpoena, and in particular, is unable to obtain copies of the first advertisements created by FIELDS featuring Victim #1.
- 18. According to Victim #1, after FIELDS created and purchased the advertisements, he then provided Victim #1 with a cellular telephone and gave her specific instructions about how to act when she answered a telephone call from a client.

Victim #1 explained that she would get the address from the client, which FIELDS would then look up on-line using his home computer to determine the client's location and driving directions. He would also look up any arrest reports related to the client and the address to ensure that no prostitution related arrests had occurred at the location. If everything was to FIELDS' satisfaction, he would take Victim #1 to the client.

- 19. According to Victim #1, FIELDS continued to use the original digital photographs taken of Victim #1 in advertisements that he created and purchased through Backpage.com over the next several years, including using the original photographs in the advertisements that eventually became the NCMEC lead in April 2011.
- 20. Victim #1 stated that she purchased controlled substances from FIELDS in the form of prescription pain medications, and other prescription mood stabilizers.

 According to Victim #1, she regularly consumed Oxycodone, Roxicodone, Dilaudid,

 Xanax, and other types of prescription medication.
- 21. Victim #1 explained that FIELDS had a large supply of prescription medication that he kept in his nightstand near his bed in his residence. Victim #1 stated that FIELDS obtained the drugs by filling several of his own prescriptions each month. Victim #1 stated that FIELDS never used the medication himself, but instead sold it to her and other women. According to Victim #1, the only time FIELDS took a pill was just prior to physician appointments in which he knew he would be required to take a drug test in order to receive a renewal prescription.
- 22. Victim #1 stated that she purchased drugs from only FIELDS. Victim #1 advised that she eventually ran out of money, but FIELDS sold her the drugs on credit,

and then recorded her debt in a notebook or on notebook paper. According to Victim #1, FIELDS kept the notebook and other loose pieces of paper reflecting her debt in his nightstand with the drugs in the residence. Additionally, the bedroom had locks on both sides of the doors to ensure that no one had access to the drugs in FIELDS' absence or while he was asleep.

- 23. Victim #1 stated that FIELDS required her to work off her debt by prostituting and performing sexual acts with him. According to Victim #1, prior to going into debt she would give FIELDS a share of her prostitution proceeds, but after going into debt FIELDS kept all of her proceeds. FIELDS would record the payments Victim #1 made to him in the same notebook or other papers on which he recorded her debt.
- 24. Victim #1 stated that on at least two other occasions, FIELDS provided her drugs and hypodermic syringes while she was in the hospital in March 2012. Victim #1 stated that the drugs were Dilaudid and Roxicodone. One of these occasions was captured on hospital security video. The video clearly shows FIELDS handing Victim #1 a small packet from which she removes and ingests pills. FIELDS was escorted from the hospital on this occasion. Victim #1 stated that FIELDS threatened her against informing anyone that he had provided her with the aforementioned drugs. Victim #1 also stated that she did not want to prostitute for FIELDS but that if she tried to leave, FIELDS would withhold drugs from her, forcing her to become "pill sick," or experience a violent withdrawal from the drugs causing serious and harmful physical side effects. On at least one occasion, FIELDS physically forced prescription drugs down Victim #1's throat when she refused to keep working for him. FIELDS kept Victim #1 under his control by feeding her prescription drug addiction, keeping her in debt to him, and

forcing her to work off the debt by prostituting. On another occasion, FIELDS became physically abusive with Victim #1 and hit her in the face in order to force her to keep prostituting for him.

- 25. Victim #1 has not had regular contact with FIELDS since her hospitalization in March 2012.
- 26. Victim #2, the other female in FIELDS' vehicle on April 21, 2011, was interviewed by your Affiant on April 21, 2011; May 9, 2012; May 15, 2012; November 26, 2012; and November 30, 2012. Victim #2 stated that she was a prostitute working for FIELDS. Victim #2 was over 18 years old when she began to prostitute for FIELDS. Victim #2 began working for FIELDS in approximately February 2011 and continued until on or about November 10, 2012. Victim #2 also lived with FIELDS at his residence for various intervals of time during this period, the latest of which being mid-to-late October through on or about November 10, 2012.
- 27. Victim #2 stated that as recently as November 10, 2012, she observed a steady stream of females in and out of FIELDS' residence and observed various females purchase prescription drugs from FIELDS. Additionally, Victim #2 has observed females engaged in sex acts with FIELDS in lieu paying of money for drugs.
- 28. Victim #2 explained that she purchased drugs from FIELDS regularly from January 2011 through November 2012. FIELDS would sell Victim #2 various prescription drugs, including Adderall, Xanax, Roxicodone, and Klonopin. Victim #2 added that FIELDS taught her how to inject the drugs and provided the hypodermic syringes.

- 29. According to Victim #2, she was a recreational drug user when she started purchasing drugs from FIELDS in or about January 2011. In or about February 2011, when Victim #2 ran out of money, FIELDS sold her the drugs on credit and kept track of her debt. Victim #2 said that once she was several hundred dollars in debt to FIELDS for drugs, FIELDS required her to prostitute in order to pay down her debt. In addition, FIELDS sometimes required Victim #2 to engage in sexual acts with him as payment toward the debt. Victim #2 added that FIELDS confiscated her wedding band and cellular telephone as a means to keep her working for him and paying down her debt.
- 30. FIELDS kept all of the proceeds of Victim #2's prostitution and kept track of the payments toward her debt. Victim #2 stated that FIELDS would use a notepad or loose pieces of paper to keep track of her debt. Victim #2 stated that the notepad and loose pieces of paper were stored in the nightstand next to FIELDS' bed. Victim #2 stated that FIELDS would frequently misrepresent the amount she owed in an effort to obtain more money or sex from Victim #2.
- 31. Victim #2 explained that FIELDS used a digital camera to take sexually explicit photographs of her in order to create and purchase advertisements on Backpage.com. Your Affiant has corroborated this information in part by obtaining copies of several advertisements from Backpage.com featuring Victim #2 that were purchased with FIELDS' credit card using a Backpage.com account registered to FIELDS' home computer.
- 32. Victim #2 stated that during her most recent stay at FIELDS' residence in mid-to-late October through on or about November 10, 2012, FIELDS had a desktop computer in the common room, a laptop in his bedroom, and an HTC smartphone.

Victim #2 stated that FIELDS has images of all of the women that he photographed for prostitution advertisements on the desktop computer. According to Victim #2, she knows this because FIELDS showed her the photographs. Victim #2 stated that FIELDS looks at the images on a regular basis, and she described these images as FIELDS' trophies. Additionally, FIELDS uses his HTC smartphone to photograph the images on the screen of the desktop computer because he does not know how upload from the desktop computer to his phone.

- 33. Like Victim #1, Victim #2 stated that she did not want to prostitute for FIELDS but that if she tried to leave FIELDS, he would withhold drugs from her forcing her to become "pill sick," or experience a violent withdrawal from the drugs with serious and harmful physical side effects. Victim #2 was scared of the violent effects of the withdrawal. FIELDS kept Victim #2 under his control by feeding her prescription drug addiction, keeping her in debt to him, and forcing her to work off the debt by prostituting.
- 34. Victim #2 stated that she moved out of FIELDS' residence on approximately November 10, 2012. According to Victim #2, as of that time, FIELDS was obtaining prescription drugs from various pharmacies through his own prescriptions, and was also having an associate named "Paul," (who is Victim #2's exbrother-in-law), purchase prescription pills using his own prescription and then sell the pills to FIELDS. Victim #2 accompanied FIELDS and Paul to obtain prescriptions and fill them as recently as October 15, 2012. Additionally, FIELDS was still selling prescription drugs from his residence.
- 35. Victim #2 further advised that FIELDS sometimes purchased prescription drugs from a third individual named "Greg." Victim #2 explained that FIELDS would

drive Paul to a doctor and then a pharmacy to obtain the prescription drugs. FIELDS would purchase roughly three quarters of Paul's filled prescription. FIELDS would also drive to Plant City to purchase the prescription drugs from Greg. Victim #2 accompanied FIELDS on several of these trips and observed these transactions. Victim #2 stated that FIELDS typically received 120 prescription pills for his prescription, 90 prescription pills from Paul, and 150 prescription pills from Greg per month.

- 36. Victim #2 stated that FIELDS would place the prescription pills in the nightstand next to his bed or behind a "stuffed cat" which FIELDS had in his bedroom. Additionally, FIELDS places Soma (brand name for Carisoprodol) prescription pills in the drawer next to the computer. Victim #2 stated that she has observed FIELDS place the prescription drugs in the aforementioned locations on numerous occasions, including as recently as early November 2012.
- 37. In addition to interviewing Victim #1 and Victim #2, your Affiant interviewed several other women who similarly purchased prescription drugs from, and prostituted for, FIELDS.
- 38. Victim #3 was interviewed on April 26, 2011; May 11, 2012; and October 23, 2012. Victim #3 stated that she purchased drugs from, and prostituted for, FIELDS from approximately December 2008 to November 2011. Victim #4 was interviewed on April 28, 2011; May 16, 2012; and July 17, 2012. Victim #4 stated that she purchased drugs from, and prostituted for, FIELDS from approximately March 2009 through August 2011. Victim #5 was interviewed on May 10, 2012. Victim #5 stated that she purchased drugs from, and prostituted for, FIELDS from approximately August 2009

through December 2009. Victims #3, #4, and #5 were all over 18 years of age when they began prostituting for FIELDS.

- 39. Victims #3, #4, and #5 all stated that FIELDS actively advertised, booked, and transported them for purposes of engaging in commercial sex acts. They all advised that FIELDS used a digital camera to take sexually explicit photographs of them for the purpose of creating and purchasing advertisements on Backpage.com using his home computer. Like Victims #1 and #2, Victims #3, #4, and #5 also advised that FIELDS would use the home computer to look up the address of the prostitution clients, and to check arrest reports related to the clients' addresses.
- 40. Like Victims #1 and #2, Victims #3, #4, and #5 all advised that they purchased prescription drugs from FIELDS, specifically Oxycodone and Roxicodone among others. They stated that they eventually fell into debt to FIELDS from purchasing the prescription drugs, and that FIELDS required them to work off the debt by prostituting. Victim #5 stated that on several occasions, she performed sexual acts on FIELDS in lieu of payment toward her debt. Again, Victims #3, 4, and 5 advised that FIELDS forced them to prostitute to pay down the drug debt and if they wanted to leave him, he would withhold pills from them forcing them to become "pill sick" until they would agree to prostitute again.
- 41. Victim #4 stated that FIELDS contacted her in April 2012 to remind her that she still owed him money and attempted to convince her to return and prostitute for him again to pay off her debt. According to Victim #4, she declined to return to prostituting for FIELDS.

42. Based on your Affiant's investigation to date, as many as 20 other women either regularly purchased prescription drugs from, and/or prostituted for, FIELDS.

EXECUTION OF FEDERAL SEARCH WARRANT

- 43. On December 18, 2012, United States Magistrate Judge Mark A. Pizzo authorized a federal search warrant for FIELDS' residence in case number 8:12-mj-1783MAP for violations of 18 U.S.C. § 1591 (commercial sex trafficking); 21 U.S.C. § 841(a)(1) (possession with intent to distribute and distribution of federal controlled substances), and 18 U.S.C. § 2421 (transportation for criminal sexual activity). The search warrant was executed on December 19, 2012. In short, the evidence that was recovered from FIELDS' residence was entirely consistent with and corroborated the Victims' statements, as described above.
- 44. FIELDS' bedroom door had both an exterior "pad lock" type lock as well as an interior chain, allowing the bedroom to be locked from both the inside and the outside, as described by Victims #1 and #2.
- 45. Law enforcement located the following examples of evidence of commercial sex trafficking in FIELDS' bedroom consistent with the Victims' statements: a copy of the Backpage.com advertisement of Victim #1 dated April 16, 2011, which was the genesis for the initiation of this investigation; large quantities of U.S. currency in denominations consistent with prostitution and narcotics sales; a "pimp stick", which based on your Affiant's training and experience is used by pimps as a status symbol and method to control sex trafficking victims through force; a book by "Iceberg Slim" entitled *Pimp, The Story of My Life*, which based on your Affiant's training and experience is known in the prostitution world as the "manual" on how to be a successful

pimp and contains chapters on how the pimp can control his victims; women's lingerie; and a receipt from Cirilla's a retail establishment in Tampa, Florida that sells women's lingerie, showing a cash transaction on October 8, 2012 for multiple items of women's lingerie. Importantly, law enforcement located in the nightstand next to FIELDS' bed a "ledger" as described by the Victims depicting the name of one of the victims and what appeared to be a debt tally, containing multiple lines of additions and subtractions. Law enforcement also located a ledger containing a debt tally for one of the known johns who was described by multiple victims as a client. Also located was a client ledger containing two pages of phone numbers of various men, and at the top of the ledger was a phone number associated with online advertisements for one of the Victims. One of the client numbers was highlighted with the notation "cops." In addition, law enforcement located condoms, lubricants, money wrappers, and other items in FIELDS' bedroom all consistent with the Victims' statements about what would be found there.

46. Additionally, law enforcement located substantial evidence of FIELDS' illegal narcotics distribution consistent with the Victims' statements. Numerous books related to drug manufacturing were located throughout the residence, including the following: The Pill Book, The Whole Drug Manufacturer's Catalog, The Anarchist Cookbook, The Operation and Construction of Clandestine Drug Laboratories, Secrets of Methamphetamine, The American Medical Association's Guide to Prescription and Over-the-Counter Drugs, Cocaine Handbook, and The Book of Acid. Notably, multiple unfilled prescriptions were located in the residence in both FIELDS' name and the name of Paul Fry, who Victim #2 referred to as one of FIELDS' sources for prescription drugs. For example, there was an unfilled prescription for FIELDS for 120 Oxycodone 30 mg

tablets dated November 20, 2012; an unfilled prescription for FIELDS for 120 Adderall dated February 13, 2012; and an unfilled prescription for FIELDS for 120 Adderall dated April 14, 2011. In your affiant's training and experience, someone who is utilizing pain medication for legitimate purposes does not retain unfilled prescriptions. In addition, law enforcement located two unfilled prescriptions for Paul Fry, both dated December 18, 2012, the day before the search warrant was executed. One prescription was for 90 Morphine Sulfate 30 mg tablets for "chronic pain," and the other was for 120 Dilaudid 8 mg tablets for "pain." This is significant because Victims advised that FIELDS was providing them with both Dilaudid and Morphine, yet pharmacy records for FIELDS do not show FIELDS filling any prescriptions for himself for these narcotics. This evidence also corroborated Victim #2's statement that FIELDS was obtaining prescription drugs from Paul Fry.

47. Additionally, law enforcement located in FIELDS' residence thousands of controlled prescription drugs in various pill bottles---some labeled and some without labels, and some containing different types of pills mixed together. In sum, law enforcement located approximately 15 pills of Alprazolam, a/k/a Xanax (Schedule IV); approximately 151 pills of Amphetamine/Adderall (Schedule II); approximately 933 pills of Carisoprodol, a/k/a Soma (Schedule IV); approximately 450 pills of Oxycodone (Schedule II); 4 pills of Oxycontin (Schedule II); approximately 47 pills of Effexor; approximately 23 pills of Lexapro; approximately 1,630 pills of Sertraline; approximately 121 pills of Tramadol; approximately 59 pills of Trazadone; and approximately 27 pills of an unknown substance. In sum, law enforcement located over approximately 8,800 pills

in FIELDS' residence, approximately 4,300 of which were scheduled controlled substances requiring prescriptions.

- 48. Law enforcement also researched pharmacy records to determine how many prescription pills FIELDS obtained from January 2010 through November 24, 2012 and learned that FIELDS had filled the following prescriptions: approximately 3,220 dosage units of Alprazolam (Xanax) (Schedule IV); approximately 825 dosage units of Adderall (Schedule II); approximately 3,600 dosage units of Carisoprodol (Soma) (Schedule IV); approximately 20 dosage units of Oxy-Acetamenaphine (Percocet) (Schedule II); and approximately 4,200 dosage units of Oxycodone (Schedule II), for a total of approximately 11,865 prescription pills during that time period. In FIELDS' residence, law enforcement also found a receipt from a Sweetbay grocery store showing a cash payment for five prescriptions on June 22, 2012. One of the Victims had identified this particular Sweetbay grocery store as a location where FIELDS filled some of his prescriptions. Law enforcement also located in the drawer in FIELDS' bedroom cash and plastic baggies commonly used to package and sell narcotics. Importantly, law enforcement also located a homemade tourniquet and multiple boxes of hypodermic needles and syringes, which is consistent with Victims' statements that FIELDS would have them inject the prescription drugs and taught them how to do it. In addition, one of the Victim's wallet, identification, and some of her clothing was found in FIELDS' bedroom as the Victim stated these items would be found.
- 49. Law enforcement also researched Paul Fry's prescription history from the time frame of August 22, 2011 through December 10, 2012. Pharmacy records show

that during this time frame, Fry filled prescriptions for approximately 650 dosage units of Alprazolam (Schedule IV); approximately 225 dosage units of Klonopin (Schedule IV); approximately 30 dosage units of Hydrocodone-Acetamenaphine (Vicodin) (Schedule III); approximately 1,110 dosage units of Morphine, a/k/a Ms Contin (Schedule II); and approximately 450 dosage units of Oxycodone (Schedule II), for a total of approximately 3,325 prescription pills during this time frame.

50. The federal search warrant also authorized the seizure of computers, cell phones, GPS devices, and other electronic devices. Law enforcement seized a laptop. two computer hard drives, camcorders, cell phones, and three GPS units. A complete forensic review is still ongoing, but a preliminary review revealed, on one computer, thousands of sexually explicit photographs and images of the known Victims and multiple other unknown females, consistent with what the Victims advised would be found on these items. Many of the photographs were consistent with prostitutionadvertisement-type photographs found on Backpage.com and other magazines that FIELDS utilized to advertise his Victims. In FIELDS' "internet favorites," law enforcement found bookmarks for "Internet Recipes for Injecting Pills," "How to Prepare for the Injection," "How to Cook Crack Cocaine," and "Heroin Online." FIELDS also bookmarked a strip club in the Tampa area specifically discussed by a Victim as one where FIELDS made her prostitute. The internet favorites also showed local jail and criminal history lookups, consistent with what the Victims stated about how FIELDS would look up any arrest reports related to a client and the address to ensure that no prostitution related arrests had occurred at a location. In addition, forensics showed

that FIELDS had performed a Google Search on the subject of how much jail time for drug trafficking in Florida.

51. On March 20, 2013, your affiant received a telephone call at approximately 5:20 a.m. that FIELDS had arrived at a methadone clinic in the Tampa, Florida area where a Victim is receiving treatment for drug addiction in an attempt to make contact with that Victim. FIELDS had another female in his vehicle with him. Your affiant made contact with the female, who voluntarily agreed to speak with me. The female is 41 years old. The female advised that several days ago, she was walking in a known prostitution area of Tampa attempting to make her way to a strip club. The female was living out of a motel with no stable residence. FIELDS randomly pulled up beside her in his vehicle and offered her a ride. Rather than take the female to her choice of strip club, FIELDS took the female to the strip club referenced above on FIELDS' internet history where FIELDS had prostituted another Victim. FIELDS then took the female to his residence and showed her the bedroom where other Victims had stayed and offered for her to live in that room. In the residence, the female observed numerous pill bottles but did not know what kind of pills they were. Upon detaining FIELDS, your affiant located in his front pocket 21 pills of Alprazolam (Xanax), a Schedule IV controlled substance.

CONCLUSION

52. Based upon the above information, probable cause exists to believe that FIELDS has committed violations of 18 U.S.C. § 1591 (commercial sex trafficking by force and coercion) and 21 U.S.C. § 841(a)(1) (possession with the intent to distribute

and distribution of federal controlled substances). Thus, your affiant respectfully requests that this court authorize a criminal complaint against FIELDS.

Further Affiant sayeth naught.

William J. Willige Special Agent

Homeland Security Investigations

Sworn and subscribed to before me this day of March, 2013.

THOMAS G. WILSON

UNITED STATES MAGISTRATE JUDGE