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I, Adriana Mirarchi, being first duly sworn state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the Department of Homeland Security, Immigration and Customs Enforcement, currently assigned to the Office of the Assistant Special Agent in Charge, Norfolk, Virginia, hereinafter "Homeland Security Investigations," "HSI," or "HSI Norfolk." I have been so employed since 2009. Prior to my employment with HSI, I served as a Special Agent with the State Department, Bureau of Diplomatic Security, starting in 2005. As a Special Agent, I have received specialized training in the enforcement of laws concerning money laundering, passport fraud, identity theft, document fraud, commercial fraud and human trafficking, and have conducted investigations concerning these violations.
2. The information contained in this affidavit is based on personal knowledge and experience, review of documents, observations, and information conveyed to me by other individuals, including information obtained from other law enforcement agencies.
3. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for an arrest warrant, this affidavit does not set forth each and every fact learned by me or observed by me during the course of this investigation.
4. This affidavit includes only the facts I believe are necessary to establish probable cause to believe that NAEEM LATEEF ODUMS committed a violation of 18 U.S.C. § 1591(a)(1), Sex Trafficking by Force, Fraud, or Coercion, within the Eastern District of Virginia.

LEGAL AUTHORITY

5. Title 18, United States Code, Sections 1591(a)(1), in pertinent part, makes it a criminal offense to knowingly in or affecting interstate or foreign commerce, recruits, entices, harbors, transports, provides, obtains, advertises, maintains, patronizes, or solicits by any means a person, knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act. "Coercion" is defined by Title 18, United States Code, Section 1591(e)(2) to mean: (A) threats of serious harm to or physical restraint against any person; (B) a scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or (C) the abuse or threatened abuse of law or the legal process. Title 18, United States Code, Section 1591(e)(4) defines "serious harm" to mean any harm, whether physical or nonphysical, including psychological, financial, or reputational harm, that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing commercial sexual activity in order to avoid incurring that harm.

BACKGROUND OF THE INVESTIGATION AND
FACTS SUPPORTING PROBABLE CAUSE

Identification of Jane Doe

6. On January 29, 2017, the Hampton Roads Human Trafficking Task Force received a tip from the National Human Trafficking Hotline, concerning the sex trafficking of Jane Doe by NAEEM LATEEF ODUMS. The tip stated that ODUMS broke three of Jane Doe's ribs and punctured her lung a few weeks ago. The tip indicated that ODUMS forces "victims to engage in commercial sex in unknown hotels" and that he advertises women on unknown websites. The tip noted that ODUMS "is extremely physically abusive" to Jane Doe, who "has been forced to stay in this situation for nine years" and that he takes all of Jane Doe's money.

Jane Doe

7. In February of 2017, Jane Doe was located and interviewed by HSI and Portsmouth Police Department (PPD). Jane Doe stated that she met NAEEM LATEEF ODUMS in 2008 and began engaging in commercial sex acts at his direction shortly thereafter. Jane Doe stated that ODUMS taught her how to prostitute and established rules for her to follow while prostituting. Jane Doe had her first child by ODUMS in 2009, and later had two additional children by him.

8. Jane Doe stated that she moved to Virginia from California with ODUMS and their children in the summer of 2014. In September 2014, ODUMS took her and their children to the Suburban Extended Stay Hotel, [REDACTED], located in Hampton, Virginia. Jane Doe stated that, as in the past, ODUMS required her to engage in commercial sex acts, which he called "dates" and facilitated her prostitution through the placement of advertisements for her services on Backpage.com, while at this hotel and others in the Eastern District of Virginia. While at this hotel two of the men she met for dates were Cooperating Source 1 and Cooperating Source 2, as referenced in Paragraphs 22 through 24 below. She provided all the money she earned from her dates to ODUMS.

9. After posting advertisements for Jane Doe, ODUMS communicated with commercial sex customers to arrange appointments, rented rooms in hotels for the purpose of Jane Doe engaging in commercial sex, and transported Jane Doe to take "out-call" appointments – commercial sex acts at a location other than the hotel where she was staying. Jane Doe stated ODUMS used the email addresses: kokane500@gmail.com and kocalikane100@gmail.com, to post advertisements on Backpage.com, for commercial sex with Jane Doe, via his cellular telephone. Jane Doe further stated that ODUMS used his personal phone number as the contact number within the Backpage.com advertisements, and screened all calls from potential customers responding to the advertisements.

10. ODUMS generally required Jane Doe to take between one and four "dates" per day as he saw fit, which consisted of 15 minute "quick visits" to overnight appointments. ODUMS set the prices for her appointments, which ranged from \$50 for a "quick visit" to over \$1,000 for an overnight "date". At the end of each "date," ODUMS collected all the money Jane Doe earned. She was not allowed to keep any of it.

11. Jane Doe held jobs at a restaurant, retail store, and as a home health aide. Jane Doe explained that ODUMS required her to cash the paychecks she received from these jobs and hand all the money to ODUMS.

12. Jane Doe stated that ODUMS was known to use the aliases “Kane” and “KO”. Jane Doe stated that, in 2013, ODUMS became angry with Jane Doe, transported her to a local tattoo parlor, and forced her to get a tattoo on the side of her neck, which reads “KO’s bitch”.

13. Jane Doe stated that ODUMS was often physically violent with her, which included kicking her, punching her, and hitting her with chairs, ashtrays, and other objects. On one occasion, ODUMS threatened Jane Doe by placing a pillow to her face and putting a gun on the other side of the pillow and pulling the trigger. ODUMS told Jane Doe that if she left him, he would kill her as well as her mother.

14. ODUMS made Jane Doe go on “dates” regularly from 2008 to 2017, in multiple states. In the summer of 2014, when ODUMS moved Jane Doe and their children from California to Virginia and forced her to prostitute in multiple states along the way in order to pay for the cross country move.

15. Jane Doe stated that on January 8, 2017, ODUMS broke three of her ribs, which resulted in the puncture of one of her lungs, after beating her with his hands, feet and objects. ODUMS then forced Jane Doe to go on a “date” and, in fact, drove her to the customer’s location. Jane Doe’s client declined to engage in commercial sex with her given her injuries and paid her \$120 nonetheless. After ODUMS collected this money from Jane Doe, he drove her to the hospital because she was experiencing difficulty breathing. Jane Doe said she was reluctant to disclose that ODUMS caused her injuries out of fear that he would kidnap her children.

16. Medical records from Sentara Norfolk General Hospital reflect that Jane Doe was hospitalized from January 8 to January 11, 2017, for treatment of broken ribs and a punctured lung. Medical records noted “patient fears for safety of her children currently in custody of assailant,” and further stated that Jane Doe “is concerned that if [her assailant] finds out that she told people he assaulted her he may flee with her children.” Prior to discharge, Jane Doe stated to the hospital social worker that she wanted a list of “community resources for domestic abuse,” but requested that the list be sent to her via email so that ODUMS would not see it.

Records Reviewed by HSI

17. In February of 2017, HSI received records from Backpage.com reflecting advertisements for Jane Doe’s escort services beginning on November 22, 2014, and continuing up through December 19, 2016.

18. One such advertisement identified within the records received from Backpage.com, was identified as Post ID 13462734, and titled “OUT call Special ..120ROSES – 25”. This advertisement was initially posted on the Newport News Adult Entertainment – Newport News Escorts section on November 22, 2014, and then reposted at a later date. Records from

Backpage.com indicated this advertisement was created on November 22, 2014, the same day the user kokane5000@gmail.com created an account with Backpage.com. Post ID 13462734 was comprised of three photographs of Jane Doe wearing lingerie, accompanied by the following text:

Soft warm skin..smooth to the touch
Enjoy a Massage..
Strip Tease..
Or One 1 one Pleasure Trip..
Donations for my Time Are
160 Roses Hour
120 Roses Half
NO BLACK MEN (PERIOD)
Out Call Only....!! [REDACTED]8111
See u Soon MUUAHH..XOXO!
Poster's age: 25
• Location: Newport News
• Post ID: 13462734 newportnews

19. Records received in February 2017 from the Suburban Extended Stay Hotel, [REDACTED], Hampton, Virginia, indicated that Jane Doe and NAEEM LATEEF ODUMS rented a room from September 2014 to November 22, 2014. These records indicated ODUMS provided his telephone number as [REDACTED]8111 to hotel staff, the same telephone number listed in Post ID 13462734.

20. In February of 2017, a member of the Suburban Extended Stay Hotel staff was interviewed by HSI and Hampton Police Department, and indicated that Jane Doe would have male visitors arrive for short stays in the hotel room rented by NAEEM LATEEF ODUMS. This staff person observed ODUMS leave the hotel room with their children and return after Jane Doe's male visitors departed. The staff person explained that Jane Doe and ODUMS were asked to leave the premises by management because of these activities.

21. The staff person indicated that at one point during her stay, between September and November of 2014, the staff person interacted with Jane Doe in the hotel lobby and observed an injury to Jane Doe's mouth, which Jane Doe attempted to hide from the staff person.

Statements of Cooperating Sources

22. In March of 2017, Cooperating Source 1 (CS-1) was interviewed by HSI and PPD concerning Jane Doe. CS-1 stated he met Jane Doe at the Suburban Extended Stay Hotel, pursuant to a Backpage.com advertisement, for the purpose of engaging in commercial sex. CS-1 stated he paid for Jane Doe's hotel room with his credit card on November 13, 2014. Staff from the Suburban Extended Stay Hotel confirmed that CS-1 paid for Jane Doe's hotel room on November 13, 2014.

23. CS-1 stated that in approximately March of 2016, he observed Jane Doe with a black eye

and that in January of 2017, Jane Doe sent him text messages indicating that she had been hospitalized after sustaining three broken ribs and a punctured lung. Jane Doe also texted photographs of her injuries to CS-1, but did not disclose how she received these injuries. CS-1 further stated that in late January or early February of 2017, Jane Doe's child told CS-1 that ODUMS caused these injuries.

24. In March of 2017, HSI and PPD interviewed Cooperating Source 2 (CS-2) who stated he met Jane Doe at the Suburban Extended Stay Hotel in 2014, pursuant to a Backpage.com advertisement for the purpose of engaging in commercial sex. CS-2 showed HSI and PPD the text messages s/he received from Jane Doe on January 9, 2017, in which Jane Doe stated she (Jane Doe) was hospitalized due to three broken ribs and a punctured lung.

25. In March of 2017, HSI and PPD interviewed Cooperating Source-3 (CS-3) who stated s/he met Jane Doe, in the Summer of 2015, when they were coworkers at a Quizno's restaurant in Chesapeake, Virginia. Jane Doe told CS-3 that ODUMS forced Jane Doe to move to Virginia from California and forced her to engage in commercial sex acts in numerous states along the way in order to pay for the cross country trip.

26. CS-3 stated that Jane Doe related that ODUMS screens calls received pursuant to commercial sex advertisements on Backpage.com, and that he would drop off and pick up Jane Doe for "dates" in a car with their children in the back seat. CS-3 said Jane Doe stated she could not leave ODUMS and had to engage in commercial sex at his direction for the benefit of her children. Jane Doe showed CS-3 at least one Backpage.com advertisement for commercial sex with Jane Doe.

27. CS-3 observed Jane Doe with bruises on her face, which Jane Doe explained were caused by ODUMS. CS-3 stated that Jane Doe's personality changed and she became very timid while in the presence of ODUMS. CS-3 added that she observed ODUMS would frequently sit outside Quizno's in his car during Jane Doe's entire shift.

28. In March of 2017, HSI and PPD interviewed Cooperating Source 4 (CS-4) who stated s/he hired Jane Doe to work as a home health aide in 2015. CS-4 observed Jane Doe report to work on numerous occasions with injuries, including scratches on her neck, a bite mark below her collar bone, and bruises on her face, thigh, back, and torso, which Jane Doe stated were caused by ODUMS. Jane Doe told CS-4 that she was afraid of leaving ODUMS out of fear that he would kidnap their children.

29. CS-4 observed ODUMS accompany Jane Doe to CS-4's office in order for Jane Doe to pick-up her biweekly paycheck on multiple occasions. CS-4 stated that on one such occasion ODUMS did not accompany CS-4 to pick up her paycheck but instead sat in the waiting room of CS-4's office. On this occasion Jane Doe had scratches on her neck, which she told CS-4 were caused by ODUMS. While CS-4 was speaking with Jane Doe concerning this, ODUMS came into CS-4's office and told Jane Doe to hurry-up because they had to leave. CS-4 stated that Jane Doe went from being "bubbly" while at work to very timid and quiet when ODUMS was nearby.

30. CS-4 stated she visited Jane Doe at her home in Portsmouth, Virginia, on a Saturday in January 2017, to make sure that Jane Doe was all right because she had not heard from Jane Doe in a few days. When CS-4 arrived at Jane Doe's home, Jane Doe met her outside and explained that she was not feeling well. CS-4 received a phone call from Jane Doe the following Tuesday, in which Jane Doe advised she was hospitalized. CS-4 advised Jane Doe to report ODUMS' physical abuse to the hospital social worker.

31. On February 6, 2017, Portsmouth Police Department (PPD) arrested NAEEM LATEEF ODUMS on charges of Aggravated Malicious Wounding and Assault on a Family Member for injuring Jane Doe in January of 2017. An emergency protective order forbidding communication with Jane Doe and their children was issued on February 6, 2017, pursuant to these charges.

32. On February 28, 2017, Portsmouth Police Department (PPD) charged ODUMS with violation of the protective order.

33. Based on the above, I believe that there is probable cause to believe that NAEEM LATEEF ODUMS committed a violation of 18 U.S.C. § 1591(a)(1).

Adriana Mirarchi
Special Agent
Homeland Security Investigations

Read and Approved:

V. Kathleen Dougherty
Assistant United States Attorney

Sworn and subscribed to before me
On this _____ day of March 2017.

The Honorable Lawrence R. Leonard
United States Magistrate Judge
Norfolk, Virginia