

UNITED STATES DISTRICT COURT

for the

District of New Jersey

United States of America

v.

SEMAJ A. GILMORE

Case No.

Mag. No. 21-mj-7041 (KMW)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 13, 2021 in the county of Burlington in the District of New Jersey, the defendant(s) violated:

Code Section
18 U.S.C. § 1951(a)(1)

Description of Offenses
See Attachment A.

This criminal complaint is based on these facts:

See Attachment B.

Continued on the attached sheet.

Complainant's signature

James Webb, Special Agent, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

telephone (specify reliable electronic means)

Date: 04/14/2021

Judge's signature

City and state: District of New Jersey

Hon. Karen M. Williams, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED
UNITED STATES ATTORNEY

By: /s/Jeffrey Bender
Jeffrey B. Bender, Assistant U.S. Attorney

Date: April 14, 2021

ATTACHMENT A

On or about April 13, 2021, in Burlington County, in the District of New Jersey and elsewhere, the defendant,

SEMAJ A. GILMORE,

after having had a reasonable opportunity to observe Victim A, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, in and affecting interstate commerce, "Victim A," knowing, and in reckless disregard of the fact, that "Victim A" had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1951(a)(1).

ATTACHMENT B

AFFIDAVIT

1. I, James Webb, (the "affiant"), state that I am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

2. A lead from the National Center for Missing and Exploited Children ("NCMEC") advised that Victim A was a missing female juvenile from Pennsylvania who was last seen in April 2020. Investigators learned that Victim A's photograph was posted on Website 1 in an advertisement for sexually illicit activities. Based on my training and experience, I am aware that Website 1 often is used to advertise, solicit, and coordinate acts of prostitution.

3. On April 13, 2021, an undercover agent ("UC") located in Philadelphia, Pennsylvania, contacted the phone number ("Target Phone") associated with the advertisement on Website 1 for Victim A. The user of the Target Phone indicated that the user, then posing as Victim A, was located at a motel ("Motel A") in or around Mount Laurel, New Jersey. The user of the Target Phone sent messages to the UC indicating rates of \$300.00 for an hour, \$200.00 for a half hour and \$100.00 for a short stay. Based on my training and experience, I am aware that these amounts are consistent with somebody quoting prices for commercial sex acts. The UC agreed to travel to Motel A. In response to a message from the UC that the UC was making a stop on the way to Motel A, the user of the Target Phone messaged the UC: "Get condoms while your there I'll give u the money for them."

4. On April 13, 2021 at approximately 2:55 p.m., the UC texted the Target Phone: "I'm here." A short time later, the UC received a response: "You here." The Target Phone user instructed the UC to park near a restaurant adjacent to Motel A. After parking, the UC received a text message: "Get out so I can see your not a cop." The UC exited his vehicle and received another text: "Are you a cop." The UC responded: "No" and "Im actually a dr." The UC received another message from the Target Phone: "Can you prove it when you come in?" The UC responded: "I have my hospital ID." The Target Phone replied: "Ok 237." Records from Motel A indicate that room 237 was at that time rented to Semaj A. Gilmore ("GILMORE"), and had been rented to GILMORE for approximately 20 days.

5. The UC approached room 237 of Motel A. After the UC showed the hospital identification through the window of the room to Victim A, Victim A opened the door for the UC to enter the room.

6. While inside of the room, Victim A asked the UC if he had a condom and they discussed various sexual activities. The UC indicated he needed to return to his car for money.

When the UC opened the door, other uniformed officers entered room 237. Victim A indicated to officers that she was with a male sitting in a burgundy car.

7. Meanwhile, officers conducting surveillance of Motel A observed a male, later identified as GILMORE, exit a burgundy car and enter the driver's seat of a red Jaguar in the parking lot of Motel A. GILMORE drove the red Jaguar away from Motel A at a high rate of speed. Local law enforcement officers conducted a traffic stop of the red Jaguar. As part of the traffic stop, officers recovered the Target Phone from the center console of the red Jaguar driven by GILMORE.

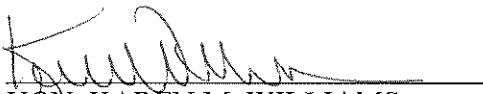
8. At all times relevant to this complaint, "Victim A" was an individual who had not attained the age of 18 years. At all times relevant to this complaint, GILMORE had a reasonable opportunity to observe Victim A, and knew, or recklessly disregarded the fact, that Victim A had not attained the age of 18 years.

Respectfully submitted,



JAMES WEBB, Special Agent
Federal Bureau of Investigation

Pursuant to Fed. R. Crim. P. 4.1, FBI Special Agent Webb was sworn and attested to the contents of this affidavit in support of the criminal complaint.



HON. KAREN M. WILLIAMS
UNITED STATES MAGISTRATE JUDGE

Date: April 14, 2021