

Approved: Jun Xiang
JUN XIANG / DANIELLE M. KUDLA
Assistant United States Attorneys

Before: THE HONORABLE STEWART D. AARON
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA	:	<u>SEALED COMPLAINT</u>
	:	
- v. -	:	Violations of
	:	18 U.S.C. §§ 1201, 1591,
DAVID WILLIAMS,	:	1594, 2422, and 2
a/k/a "Pap,"	:	
a/k/a "Pap Avilii,"	:	COUNTY OF OFFENSE:
a/k/a "Daddy,"	:	BRONX
	:	
Defendant.	:	
	:	
----- X	:	

SOUTHERN DISTRICT OF NEW YORK, ss.:

JAMES RUFLE, being duly sworn, deposes and says that he is a Detective with the New York City Police Department, and charges as follows:

COUNT ONE
(Sex Trafficking Conspiracy)

1. From at least in or about December 2018 up to and including at least in or about February 2019, in the Southern District of New York and elsewhere, DAVID WILLIAMS, a/k/a "Pap," a/k/a "Pap Avilii," a/k/a "Daddy," the defendant, and others known and unknown, did willfully and knowingly combine, conspire, confederate, and agree together and with each other to commit sex trafficking, in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2), and (b).

2. It was a part and an object of the conspiracy that DAVID WILLIAMS, a/k/a "Pap," a/k/a "Pap Avilii," a/k/a "Daddy," the defendant, and others known and unknown, willfully and knowingly, in and affecting interstate and foreign commerce, would and did recruit, entice, harbor, transport, provide,

obtain, advertise, maintain, patronize, and solicit by any means one and more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, having had a reasonable opportunity to observe such persons, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause such persons to engage in one and more commercial sex acts, and (2) one and more such persons had not attained the age of 18 years and would be caused to engage in one and more commercial sex acts, in violation of Title 18, United States Code, Sections 1591(a) and (b).

(Title 18, United States Code, Section 1594(c).)

COUNT TWO

(Sex Trafficking of Victim-1)

3. From at least on or about February 6, 2019 up to and including at least on or about February 13, 2019, in the Southern District of New York and elsewhere, DAVID WILLIAMS, a/k/a "Pap," a/k/a "Pap Avilii," a/k/a "Daddy," the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means one and more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause such persons to engage in one and more commercial sex acts, to wit, WILLIAMS recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited an adult woman ("Victim-1") and through force, threats of force, fraud, coercion, and a combination of such means, caused Victim-1 to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to WILLIAMS.

(Title 18, United States Code, Sections 1591(a), (b)(1), and 2.)

COUNT THREE

(Sex Trafficking of Victim-2)

4. From at least in or about December 2018 up to and including at least in or about February 2019, in the Southern District of New York and elsewhere, DAVID WILLIAMS, a/k/a "Pap," a/k/a "Pap Avilii," a/k/a "Daddy," the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means one and more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, having had a reasonable opportunity to observe such persons, knowing and in reckless disregard of the fact that one and more such persons had not attained the age of 18 years and would be caused to engage in one and more commercial sex acts, to wit, WILLIAMS recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited a minor victim ("Victim-2") to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to WILLIAMS.

(Title 18, United States Code, Sections 1591(a), (b)(2), and 2.)

COUNT FOUR

(Coercion and Enticement of Victim-1)

5. From at least on or about February 6, 2019 up to and including at least on or about February 13, 2019, in the Southern District of New York and elsewhere, DAVID WILLIAMS, a/k/a "Pap," a/k/a "Pap Avilii," a/k/a "Daddy," the defendant, knowingly did persuade, induce, entice, and coerce one and more persons to travel in interstate and foreign commerce, to engage in prostitution and sexual activity for which a person can be charged with a criminal offense, and attempted to do the same, to wit, WILLIAMS persuaded, induced, enticed, and coerced an adult woman, Victim-1, to travel from New Jersey to New York to engage in prostitution.

(Title 18, United States Code, Sections 2422(a) and 2.)

COUNT FIVE

(Coercion and Enticement of Victim-2)

6. From at least in or about December 2018 up to and including at least in or about February 2019, in the Southern District of New York and elsewhere, DAVID WILLIAMS, a/k/a "Pap,"

a/k/a "Pap Avilii," a/k/a "Daddy," the defendant, used facilities and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce a person who had not attained the age of 18 years to engage in prostitution and sexual activity for which a person can be charged with a criminal offense, and attempted to do the same, to wit, WILLIAMS used a cell phone to persuade, induce, entice, and coerce a minor girl, Victim-2, to engage in prostitution.

(Title 18, United States Code, Sections 2422(b) and 2.)

COUNT SIX
(Kidnapping of Victim-1)

7. From at least on or about February 6, 2019 up to and including at least on or about February 13, 2019, in the Southern District of New York and elsewhere, DAVID WILLIAMS, a/k/a "Pap," a/k/a "Pap Avilii," a/k/a "Daddy," the defendant, knowingly and unlawfully seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away and held for ransom and reward and otherwise a person, and such person was willfully transported in interstate and foreign commerce, and WILLIAMS traveled in interstate and foreign commerce and used the mail and means, facilities, and instrumentalities of interstate and foreign commerce in committing and in furtherance of the commission of the offense, and WILLIAMS failed to release such person within twenty-four hours after such person shall have been unlawfully seized, confined, inveigled, decoyed, kidnapped, abducted, and carried away, to wit, WILLIAMS, an adult, kidnapped an adult woman, Victim-1, in New Jersey and unlawfully transported Victim-1 to the Bronx, New York, where Victim-1 was confined and held for more than twenty-four hours.

(Title 18, United States Code, Sections 1201(a)(1), (b), and 2.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

8. I am a Detective with the New York City Police Department ("NYPD") and a Task Force Officer with the NYPD/Federal Bureau of Investigation ("FBI") Child Exploitation Human Trafficking Task Force. I have been personally involved in the investigation of this matter. This affidavit is based upon my investigation, my conversations with law enforcement agents and others, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all

the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview

9. From at least in or about December 2018 up to and including at least in or about February 2019, DAVID WILLIAMS, a/k/a "Pap," a/k/a "Pap Avilii," a/k/a "Daddy," the defendant ran a prostitution business (the "Business"), along with a coconspirator not named as a defendant herein ("CC-1"), who also worked as a prostitute for WILLIAMS.

10. On or about February 6, 2019, WILLIAMS and CC-1 kidnapped an adult victim, Victim-1, in Atlantic City, New Jersey and transported her to the Bronx, New York, to work as a prostitute for the Business. During the time that Victim-1 was held by WILLIAMS and CC-1, WILLIAMS and CC-1 advertised Victim-1 for sex and also forced Victim-1 to engage in sex acts with clients in exchange for money. When Victim-1 expressed resistance to being trafficked for sex, WILLIAMS brandished a gun and threatened to hurt Victim-1 unless she complied. On at least one occasion, WILLIAMS raped Victim-1. On or about February 13, 2019, Victim-1 escaped by calling 911 from a cell phone.

11. In or about December 2018, WILLIAMS and CC-1 recruited a minor girl, Victim-2, to work as a prostitute for the Business. During the ensuing months, until in or about February 2019, WILLIAMS and CC-1 advertised Victim-2 for sex and also enticed and forced Victim-2 to engage in sex acts with clients in exchange for money. WILLIAMS and CC-1 forced Victim-2 to turn over the money Victim-2 earned from prostitution. In or about February 2019, Victim-2 stopped working for WILLIAMS and CC-1.

12. In the course of this investigation, I have interviewed Victim-1, spoken with other law enforcement officers about their interviews of Victim-1 and Victim-2, and reviewed law enforcement reports reflecting statements by Victim-1 and Victim-2.

Victim-1

13. Based on my interviews of Victim-1, my conversations with other law enforcement officers, and my review of law enforcement reports, I have learned the following:

a. Victim-1 is an adult woman who was 20 years old at the time of the charged conduct.

b. On or about February 6, 2019, Victim-1 was approached at the boardwalk in Atlantic City by a man who introduced himself as "Pap," later identified to be DAVID WILLIAMS, a/k/a "Pap," a/k/a "Pap Avilii," a/k/a "Daddy," the defendant, and a woman who introduced herself as "Juli," later identified to be CC-1. WILLIAMS and CC-1 invited Victim-1 to smoke marijuana with them in their car, which Victim-1 agreed to do. Inside the car was another person (the "Driver").

c. After some period smoking with WILLIAMS and CC-1, Victim-1 grew uncomfortable and asked to leave. When Victim-1 attempted to open the car door, she realized the door was locked. WILLIAMS then said to Victim-1, in sum and substance, that Victim-1 would not be going anywhere or there would be consequences. CC-1 told Victim-1, in sum and substance, to "chill out." Victim-1 asked whether her captors had a knife, to which CC-1 responded that they had "worse."

d. On or about the same day, February 6, 2019, the Driver dropped off WILLIAMS, CC-1, and Victim-1 in the Bronx, New York. WILLIAMS and CC-1 brought Victim-1 to a hotel ("Hotel-1"), and WILLIAMS demanded that Victim-1 book a room with her identification. Once inside the hotel room, WILLIAMS and CC-1 forced Victim-1 to undress and pose for nude and sexually suggestive photographs with CC-1.¹

e. After WILLIAMS and CC-1 forced Victim-1 to pose for the photographs, WILLIAMS demanded to have sex with Victim-1. When Victim-1 refused, WILLIAMS displayed a handgun and threatened to shoot Victim-1 unless she acquiesced. WILLIAMS then forcibly raped Victim-1 and forced Victim-1 to perform oral sex on CC-1.

¹ As set forth below, the photographs that WILLIAMS and CC-1 forced Victim-1 to pose for were included in prostitution advertisements that WILLIAMS and CC-1 posted on the Internet.

f. Over the ensuing days, up until on or about February 13, 2019, WILLIAMS and CC-1 forced Victim-1 to accompany CC-1 on prostitution "dates" with customers, all of which took place in rooms at Hotel-1 and other hotels in the Bronx. During some of these "dates," CC-1 would tell Victim-1 to stay in the bathroom while CC-1 engaged in sex acts with a customer. CC-1 would then hand the money that the customer paid to Victim-1, so that Victim-1 could give the money to WILLIAMS.

g. On other "dates," WILLIAMS and CC-1 would force Victim-1 to engage in sex acts with customers. For example, WILLIAMS and CC-1 advertised sex with CC-1 and Victim-1 as a "two girl special," and customers in fact paid for such services. On those occasions, Victim-1 was generally required to masturbate the customer while CC-1 performed other sex acts on the customer. Whenever Victim-1 received money from a customer for sex acts, she was required to turn that money over to WILLIAMS.

h. On one occasion, a person who identified himself as WILLIAMS's uncle (the "Uncle") came to a hotel room where WILLIAMS, CC-1, and Victim-1 were staying. The Uncle stated that he had a "wand"--that is, a sex device--that he wanted to use on Victim-1. When Victim-1 expressed reluctance, WILLIAMS told her to do what the Uncle wanted. After the Uncle used the sex device on Victim-1, the Uncle gave WILLIAMS what appeared to be narcotics.

i. At all times when Victim-1 was with WILLIAMS and CC-1, Victim-1 did not feel free to leave. Victim-1 was generally in the presence of WILLIAMS or CC-1 (or both) and was not generally permitted access to a cell phone. Furthermore, WILLIAMS and CC-1 threatened Victim-1 with violence if she failed to comply with their instructions and reminded Victim-1 that WILLIAMS carried a handgun. On at least one occasion, WILLIAMS brandished and expressly threatened Victim-1 with his handgun. At nights, WILLIAMS routinely kept the handgun next to the bed and required Victim-1 to sleep on the same bed as WILLIAMS and CC-1.

j. On or about February 13, 2019, WILLIAMS and CC-1 left Victim-1 alone in a hotel room, along with a cell phone that WILLIAMS and CC-1 used to communicate with customers about prostitution (the "Cell Phone"). Victim-1 used the Cell Phone to call 911 and was taken to the hospital by medical personnel.

k. During the time Victim-1 was with WILLIAMS and CC-1, Victim-1 met Victim-2. Victim-2 told Victim-1, in sum and substance, that Victim-2 worked as a prostitute for WILLIAMS and CC-1. Victim-1 knew Victim-2 only by the alias that WILLIAMS and CC-1 used to refer to Victim-2.

14. Based on records obtained in the course of the investigation, I have learned the phone number assigned to the Cell Phone (the "Cell Phone Number"), which DAVID WILLIAMS, a/k/a "Pap," a/k/a "Pap Avilii," a/k/a "Daddy," the defendant, and CC-1 used to communicate with customers about prostitution.

a. Based on my training and experience, I know megapersonals.com is an Internet website where, among other things, sex traffickers post advertisements for prostitution. Prostitution advertisements posted on megapersonals.com and other websites are captured by and stored in a database (the "Database") to which I have access.

b. Based on my review of the Database, I have learned that, between in or about February 6, 2019 and in or about February 21, 2019, the Cell Phone Number was listed on over twenty prostitution advertisements on megapersonals.com. These advertisements included nude pictures of Victim-1 and CC-1 and advertised them for sex. For example, on or about February 10, 2019, an advertisement was posted on megapersonals.com, which included a nude photograph of Victim-1 and CC-1, offering: "Whether you want one or two girls, we are available and ready for you anytime." This advertisement listed the Cell Phone Number as the method of contact.

15. Based my review of video surveillance footage from Hotel-1, I have learned that on or about February 6, 2019, at approximately 11:00 p.m., DAVID WILLIAMS, a/k/a "Pap," a/k/a "Pap Avilii," a/k/a "Daddy," the defendant, CC-1, and Victim-1 were in the lobby of Hotel-1.

Victim-2

16. Based on my conversations with other law enforcement officers, and my review of law enforcement reports, I have learned the following:

a. Victim-2 is a minor who was fourteen years old at the time of the charged conduct.

b. In or about December 2018, Victim-2 met CC-1, who recruited Victim-2 to engage in prostitution and introduced Victim-2 to DAVID WILLIAMS, a/k/a "Pap," a/k/a "Pap Avilii," a/k/a "Daddy," the defendant. After Victim-2 was introduced to WILLIAMS, WILLIAMS and CC-1 took photographs of Victim-2 in revealing clothing and told Victim-2, in sum and substance, that they would post these photographs on the Internet in prostitution advertisements.

c. WILLIAMS and CC-1 put Victim-2 to work as a prostitute and arranged for Victim-2 to meet customers at Hotel-1. Victim-2 worked for WILLIAMS and CC-1 for approximately two months and, over that period, went on dozens of prostitution "dates" with customers, often seeing multiple customers in one day. After each "date," Victim-2 was required to hand over the money she received to WILLIAMS or CC-1. During this time, Victim-2 told WILLIAMS and CC-1 that she was 18 years old.

d. Even though Victim-2 was not in the continuous presence of WILLIAMS and CC-1, Victim-2 was scared to stop working for them because WILLIAMS told her, in sum and substance, that he was a Bloods gang member and that he had a gun.

e. In addition to having Victim-2 engage in prostitution, WILLIAMS and CC-1 also demanded that Victim-2 have sex with them on more than occasion. Victim-2 complied with their demands because she was scared.

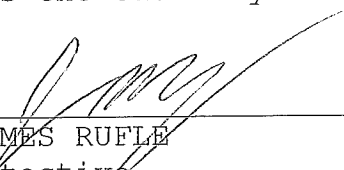
f. Victim-2 met Victim-1 toward the end of Victim-2's time working for WILLIAMS and CC-1. Victim-2 knew Victim-1 only by the alias that WILLIAMS and CC-1 used to refer to Victim-1.

g. In or about February 2019, Victim-2 stopped working for WILLIAMS and CC-1.

17. Based on my review of the Database described above, I have learned that, on or about December 28, 2018, a prostitution advertisement was posted on megapersonals.com, advertising the services of someone described as "Young Tight LatinaBarley Legal 18." The advertisement included sexually suggestive photographs of Victim-2, including photographs of her genital region, and listed the Cell Phone Number as the method of contact.


18. Based on my review of communications exchanged between the Cell Phone and Victim-2, I have learned that Victim-2 received instructions from WILLIAMS and CC-1 by electronic communications on the Cell Phone. For example, on or about February 10, 2019, Victim-2 was instructed by electronic messages from the Cell Phone to call the Cell Phone and prepare to be picked up.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of DAVID WILLIAMS, a/k/a "Pap," a/k/a "Pap Avilii," a/k/a "Daddy," the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.



JAMES RUFLE
Detective
New York City Police Department

Sworn to before me this
2nd day of January 2020



THE HONORABLE STEWART D. AARON
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK