

Approved: Camille L. Fletcher
Camille L. Fletcher
Assistant United States Attorney

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

- - - - - X

UNITED STATES OF AMERICA	:	<u>SEALED COMPLAINT</u>
	:	
- v. -	:	Violation of
	:	18 U.S.C. §§ 2422(b)
	:	and 2
FABRICE TONTISABO,	:	
a/k/a "Fabrice Williams"	:	COUNTY OF OFFENSE:
	:	NEW YORK AND WESTCHESTER
Defendant.	:	

- - - - - X

SOUTHERN DISTRICT OF NEW YORK, ss.:

ANTONIO BOLFO, being duly sworn, deposes and says that he is a Special Agent with the U.S. Department of Homeland Security, Homeland Security Investigations ("HSI"), and charges as follows:

COUNT ONE

(Enticement of Minor Victim-1 to Engage in Illegal Sexual Activity)

1. Between at least in or about October 2020, up to an including at least on or about March 9, 2021, in the Southern District of New York and elsewhere, FABRICE TONTISABO, a/k/a "Fabrice Williams," the defendant, knowingly, using a facility and means of interstate and foreign commerce, persuaded, induced, enticed and coerced an individual 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, to wit, TONTISABO, in communications over the internet and phone, persuaded, induced, enticed and coerced a 14-year-old minor ("Minor Victim-1") to travel from Westchester County, New York to meet TONTISABO in person in Brooklyn, New York on more than one occasion to engage in sexual activities with TONTISABO, for which TONTISABO paid Minor Victim-1 cash, alcohol, and marijuana.

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

COUNT TWO

(Enticement of Minor Victim-2 to Engage in Illegal Sexual Activity)

2. Between at least in or about October 2019, up to and including at least on or about January 8, 2020, in the Southern District of New York and elsewhere, FABRICE TONTISABO, a/k/a "Fabrice Williams," the defendant, knowingly, using a facility and means of interstate and foreign commerce, persuaded, induced, enticed and coerced an individual 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, to wit, TONTISABO in communications over the internet and phone, persuaded, induced, enticed and coerced a 14-year-old minor ("Minor Victim-2) to travel from Manhattan, New York to meet TONTISABO in person in Brooklyn, New York on more than one occasion to engage in sexual activities with TONTISABO, for which TONTISABO paid Minor Victim-2 cash, alcohol, and marijuana.

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

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

3. I am a Special Agent with HSI and I have been personally involved in the investigation of this matter. I have conducted and participated in numerous investigations of crimes against children, including, but not limited to, sex trafficking, enticement, and other child exploitation offenses. This affidavit is based upon my personal participation in the investigation of this matter, my conversations with law enforcement officers, the victims, and other witnesses, as well as 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 of 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.

Minor Victim-1

4. Based on my review of certain Administration for Children's Services records, I have learned, among other things, that Minor Victim-1 is currently 15 years old and has lived at a

residential facility located in Westchester County (the "Westchester Facility") since on or about November 5, 2020.

5. Based on my conversations with Minor Victim-1 and my review of law enforcement records, I have learned, among other things, the following:

a. In or about late October 2020, when Minor Victim-1 was 14 years old, an individual who identified himself as "Fabrice" approached Minor Victim-1 on the street in Brooklyn, New York. As described in further detail below, I believe "Fabrice" is FABRICE TONTISABO, a/k/a "Fabrice Williams," the defendant. TONTISABO and Minor Victim-1 exchanged their usernames for a social media application, (the "Application"). TONTISABO told Minor Victim-1 that his username on the Application was "Fabricewilliams."

b. Following their initial meeting, TONTISABO, immediately began messaging Minor Victim-1 via the username "Fabricewilliams" on the Application. TONTISABO's messages were sexually explicit, and he offered Minor Victim-1 cash, marijuana, and alcohol in exchange for sexual activities.

c. Between in or about October 2020 and on or about March 9, 2021, Minor Victim-1 visited TONTISABO at his residences on multiple occasions, during which TONTISABO engaged in sexual activities with Minor Victim-1. For example:

i. On or about November 4, 2020, TONTISABO ordered a ride from a car service (the "Car Service") for the Minor Victim-1 to bring her from her foster parent's home in Brooklyn, New York to his then-residence in Brooklyn, New York ("November 4, 2020 Car Ride"). TONTISABO met Minor Victim-1 on the street and brought her to his apartment ("Tontisabo Apartment-1") located on the third floor of the building. During that visit, TONTISABO engaged in sexual intercourse with Minor Victim-1 for which he paid Minor Victim-1 \$100 dollars. TONTISABO also gave Minor Victim-1 marijuana.

ii. At some point after November 4, 2020, TONTISABO moved to a new apartment ("Tontisabo Apartment-2"), also in Brooklyn. On or about January 18, 2021, in the early morning hours, Minor Victim-1 visited TONTISABO at Tontisabo Apartment-2. During that visit, TONTISABO engaged in sexual intercourse with Minor Victim-1 on multiple occasions; he also paid Minor Victim-1 \$200 dollars and bought her alcohol and marijuana.

iii. On other occasions between in or about November 5, 2020 and on or about March 9, 2021, TONTISABO, messaged Minor Victim-1 while Minor Victim-1 was at the Westchester Facility to solicit sexual activities from Minor Victim-1 in exchange for money. During this period, Minor Victim-1 travelled from the Westchester Facility to Brooklyn, New York to meet with TONTISABO to engage in sexual activities.

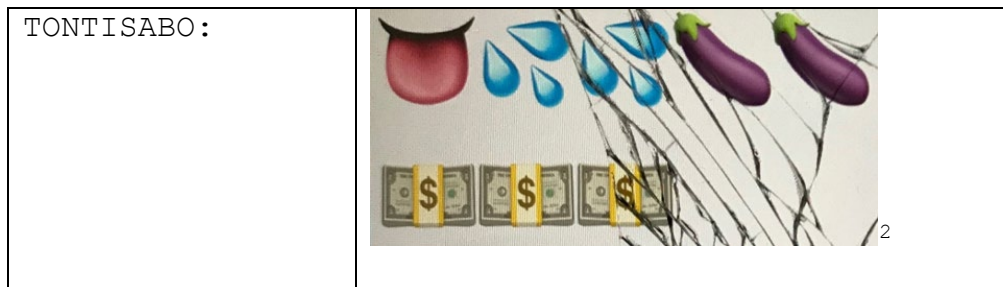
6. Based on my review of the contents of a cellphone (the "Minor Victim-1 Phone") belonging to Minor Victim-1, pursuant to a judicially authorized search warrant and my conversations with a law enforcement agent who is specially trained in the forensic examination of digital material who has participated in the review of the Minor Victim-1 Phone, I know the following:

a. There are numerous Application messages between Minor Victim-1's account on the Application and the Application username "Fabricewilliams," which FABRICE TONTISABO, a/k/a "Fabrice Williams," the defendant, provided to Minor Victim-1 during their initial meeting. For example:


b. On or about November 3, 2020, TONTISABO had the following exchange¹ with Minor Victim-1:

TONTISABO:	Yoo Wya Links?\$\$
Minor Victim-1:	I'm at home
TONTISABO:	So wtw?
Minor Victim-1:	With
TONTISABO:	Links? Let's chill Plz beautiful U have a curfew?
Minor Victim-1:	Something like dat

¹ The exchanges between FABRICE TONTISABO, a/k/a "Fabrice Williams," the defendant, and the minor victims included herein have been excerpted.



c. On or about November 4, 2020, TONTISABO had the following exchange with Minor Victim-1:

TONTISABO:	Wyd? I wanna see u now
Minor Victim-1:	I just woke up
TONTISABO:	Ok shower and come Ur about ur money? Smh . . .
TONTISABO:	And I'm a freak ok? U like big  . . .
TONTISABO:	Wanna ride my face? And what you want for that? . . . So u wanna get ur nails done when u come?
Minor Victim-1:	Yea. Come pick me up first . . .
TONTISABO:	I live right by where we meet yesterday Was gonna meet u there tho, Or what u want me to do bae?
Minor Victim-1:	Call a Uber to get me
TONTISABO:	Ohh ok
Minor Victim-1:	I'm at [] 59th street . . .
Minor Victim-1:	I'm in the car

² Based on my training and experience, I understand that the eggplant emoji symbolizes a penis, the tongue emoji symbolizes oral sex on a woman, the water droplets emoji symbolizes ejaculation, and the cash emoji indicates that cash is being offered for sexual acts.

d. On or about January 17, 2021, TONTISABO had the following exchange with Minor Victim-1:

TONTISABO:	So wtw
Minor Victim-1:	With
TONTISABO:	Links?
Minor Victim-1:	Rn?
TONTISABO:	Wya Rn . . . U spending the night
Minor Victim-1:	Yea Yea tonight
TONTISABO:	U got kicked out ur crib [] Wtf u did
Minor Victim-1:	It's a long story just send the uber
TONTISABO:	Gotta be tonight I'm doing something in the city and if u come how many days u wanna stay?
Minor Victim-1:	A week that's it
TONTISABO:	3 days

7. Based on my review of law enforcement records and records from the Car Service, I have learned, among other things, the following:

a. A ride was ordered from the Car Service on November 4, 2020 from Minor Victim-1's foster parent's home to the Tontisabo Apartment-1 (the "November 4, 2020 Car Ride").

b. The Car Service account that ordered the November 4, 2020 Car Ride (the "Car Service Account") was associated with a person named "Sidbewende Tontisabo."

c. The email address associated with the Car Service Account is "fabricewilliams@[]". The unique portion of the email is the same as the username "Fabricewilliams" from the Application that was used to solicit sexual activities from Minor Victim-1.

d. The phone number associated with the Car Service Account is the same phone number described below that was used

to solicit sexual activities from Minor Victim-2 in exchange for money ("Tontisabo Phone-1").

Minor Victim-2

8. Based on my review of certain Administration for Children's Services records, I have learned, among other things, that Minor Victim-2 was 14-years-old and living at a residential facility located in New York County (the "New York County Facility") between in or about September 2019 and in or about December 2019.

9. Based on my conversations with Minor Victim-2 and my review of law enforcement records, I have learned, among other things, the following:

a. In or about October 2019, an individual who identified himself as "Fabrice" approached Minor Victim-2 and her friend ("Friend-1") on the street in Brooklyn, New York. As described in further detail below, I believe "Fabrice" is FABRICE TONTISABO a/k/a Fabrice Williams, the defendant.

b. TONTISABO struck up a conversation with Minor Victim-2 and he gave Minor Victim-2 his phone number ("Tontisabo Phone-1"). TONTISABO immediately began sending text messages from a phone number ("Tontisabo Phone-1") to Minor Victim-2, soliciting sexual activities from Minor Victim-2 in exchange for money. TONTISABO also told Minor Victim-2 that his username on the Application was "Fabricewilliams."

c. Between in or about October 2019 and in or about January 2020, TONTISABO sent text messages from Tontisabo Phone-1 to Minor Victim-2 to arrange sexual encounters. TONTISABO met with Minor Victim-2 for sexual activities on multiple occasions during this period. Minor Victim-2 would often travel to and from the New York County Facility to meet with TONTISABO to engage in sexual activities. TONTISABO paid Minor Victim-2 approximately \$20 to \$60 per sexual encounter. TONTISABO also provided Minor Victim-2 with marijuana and alcohol during each sexual encounter. For example:

i. Approximately five days after meeting TONTISABO, Minor Victim-2 travelled from the New York County Facility to Tontisabo Apartment-1 in Brooklyn. During this visit, TONTISABO fondled Minor Victim-2 and engaged in oral sex with Minor Victim-2. At the end of the visit TONTISABO gave Minor Victim-2 \$20.

- ii. A few days after the initial visit, Minor Victim-2 visited TONTISABO again; this time, Minor Victim-2 was accompanied by Friend-1. TONTISABO ordered a ride from the Car Service for Minor Victim-2 and Friend-1 to transport them to Tontisabo Apartment-1. During this visit, TONTISABO asked Minor Victim-2 and Friend-1 to engage in sexual intercourse with him. Minor Victim-2 and Friend-1 refused to engage in sexual intercourse with TONTISABO but agreed to allow TONTISABO to perform oral sex on them in exchange for cash, alcohol, and marijuana.
- iii. In or about November 2019, Minor Victim-2 travelled to Tontisabo Apartment-1 from the New York County Facility to visit with TONTISABO. During this visit, Minor Victim-2 engaged in sexual intercourse with TONTISABO.
- iv. On or about December 31, 2019, Minor Victim-2 visited TONTISABO at Tontisabo Apartment-1. TONTISABO engaged in sexual intercourse with Minor Victim-2 and provided Minor Victim-2 with alcohol and marijuana. TONTISABO paid Minor Victim-2 approximately \$40 to \$50 dollars.

10. Based on my conversations with law enforcement and my review of law enforcement records, I have learned, among other things, that a cell phone belonging to Minor Victim-2 ("Minor Victim-2-Phone") was reviewed by officers from the New York City Police Department ("NYPD"). On Minor Victim-2-Phone, there were text messages between Minor Victim-2 and Tontisabo Phone-1, the phone number that FABRICE TONTISABO a/k/a "Fabrice Williams" had provided to Minor Victim-2 when they first met. Based on my review of screenshots of the text messages on Minor Victim-2-Phone and my conversations with Minor Victim-2, I am aware of the following:

a. In or about the Fall of 2019, TONTISABO via the Tontisabo Phone-1 exchanged numerous text messages with Minor Victim-2.³ For example:

TONTISABO:	Wyd?
TONTISABO:	Smh
TONTISABO:	Money move?

³ The exact dates when these text messages were exchanged could not be determined from the screenshots that were reviewed.

Minor Victim-2:	What
Minor Victim-2:	I was sleeping
TONTISABO:	Wtw
Minor Victim-2:	What u wanna do
TONTISABO:	 <p>4</p>
Minor Victim-2:	What that mean
Minor Victim-2:	I don't speak emoji
Minor Victim-2:	N how much u giving me
Minor Victim-2:	So u don't want me to come over? . . .
TONTISABO:	We can do that Saturday tho so I get paid and all get henny and weed
Minor Victim-2:	Im busy Saturday
Minor Victim-2:	Friday night
TONTISABO:	Kk . . .
Minor Victim-2:	How much u giving me tmr
TONTISABO:	U not going to school?
TONTISABO:	Today
Victim:	No I don't have school

⁴ Based on my training and experience, I understand that the eggplant emoji symbolizes a penis, the tongue emoji symbolizes oral sex on a woman, and the water droplets emoji symbolizes ejaculation.

Victim:	I asked u a question
TONTISABO:	Come tonight Cauz tmm I will be busy And ur toes done
Minor Victim-2:	I don't want my toes done I want money
TONTISABO:	Like 40\$ Cauz I'm broke

11. Based on my conversations with law enforcement and my review of law enforcement records, I have learned, among other things, the following:

a. FABRICE TONTISABO, a/k/a "Fabrice Williams," the defendant, was arrested on or about May 13, 2020, at the same address as the Tontisabo Apartment-1 on a charge of Rape in the Second Degree in violation of New York Penal law Section 130.30 arising from a complaint made by Minor Victim-2 and Minor Victim-2's parent.

b. TONTISABO was read Miranda warnings and agreed to answer questions.

c. TONTISABO stated that he knew Minor Victim-2 and that they would "hang out" and smoke marijuana together.

d. TONTISABO stated that he sometimes gave Minor Victim-2 money.

e. TONTISABO denied having sexual intercourse with Minor Victim-2.

12. Based on my review of NYPD records, I have learned, among other things, the following:

a. Two photographs were taken of FABRICE TONTISABO, a/k/a "Fabrice Williams," the defendant, at the time of his May 13, 2020 arrest ("Tontisabo Photo-1" and "Tontisabo Photo-2"). Prior to TONTISABO's arrest, Minor Victim-2 shared with NYPD officers a photo of "Fabrice," the man who paid her money in exchange for sex ("Tontisabo Photo-3"). Based on my comparison of the photographs, I know that Tontisabo Photo-1 and Tontisabo Photo-2 both depict the same individual in Tontisabo Photo-3.

b. Minor Victim-2 was also shown Tontisabo Photo-1; Minor Victim-2 reported that the person depicted in Tontisabo-Photo-1 was "Fabrice," the man that had paid her money for sex.

c. TONTISABO was born in the TONTISABO Birth Year and he was either 31 or 32 years old in the period between October 2019 and February 2021.

d. TONTISABO has been reported in NYPD records as a resident of the same address as the Tontisabo Apartment-1 on numerous occasions since February 2014 and was arrested at that address.

e. Tontisabo Phone-1, the number associated with the Car Service Account and the phone number that was used to solicit sexual activities from Minor Victim-2 has been associated with TONTISABO in NYPD records since at least May 2017.

13. Based on the foregoing, I believe the person that solicited, enticed, and paid Minor Victim-1 and Minor Victim-2 for sexual activities is FABRICE TONTISABO, a/k/a "Fabrice Williams," the defendant.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of FABRICE TONTISABO, a/k/a "Fabrice Williams," the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

/s/ Antonio Bolfo, by SDA with permission
Special Agent ANTONIO BOLFO
Homeland Securities Investigations

Sworn to me through the transmission of this Affidavit by reliable electronic means, pursuant to Federal Rules of Criminal Procedure 41(d)(3) and 4.1 this 9th day of September 2021



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