

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of Ohio

FILED

10:02 am Apr 07 2017

Clerk U.S. District Court  
Northern District of Ohio  
Toledo

United States of America  
v.  
Anthony J. Haynes

Case No.  
3:17 MJ 5074

Defendant(s)

CRIMINAL COMPLAINT

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

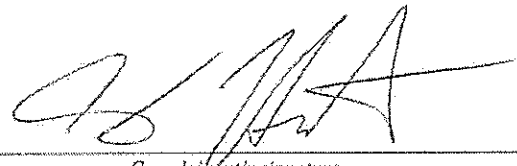
On or about the date(s) of Jan. 2014 to April 2017 in the county of Lucas in the  
Northern District of Ohio, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 1591(a) and (d)	Sex trafficking and obstruction

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.



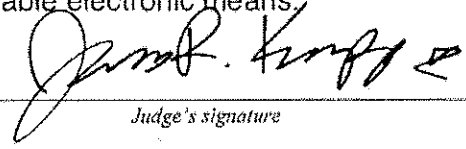
Complainant's signature

Alex O. Hunt, SA FBI

Printed name and title

Sworn to before me ~~XXXXXXXXXXXX~~ by telephone and reliable electronic means.

Date: 04/07/2017



Judge's signature

City and state: Canton, Ohio

James R. Knepp, II, U.S. Magistrate Judge

Printed name and title

United States District Court )  
Northern District of Ohio )  
Western Division )

**FILED**  
**10:02 am Apr 07 2017**  
**Clerk U.S. District Court**  
**Northern District of Ohio**  
**Toledo**

**AFFIDAVIT**

**I. Introduction Agent Background**

I, Alex O. Hunt, being duly sworn and deposed, stated the following:

1. I am an "investigative or law enforcement officer of the United States" empowered to make arrests within the meaning of Title 18, United States Code, Section 3052 and to execute search warrants and conduct seizures within the meaning of Title 18, United States Code, Section 3107 for violations of the laws of the United States.

2. I am a duly appointed Special Agent, employed by the United States Department of Justice, Federal Bureau of Investigation (FBI). I have been a Special Agent with the FBI since 2015. I am currently assigned to the FBI Cleveland Division, Toledo Resident Agency. I was previously employed as a patrol officer for the Lilburn Police Department in Lilburn, Georgia from 2009 to 2011 and as a criminal investigator for the Gwinnett County Solicitor's Office in Lawrenceville, Georgia from 2011 to 2015. Since 2009, I have received training and have experience in interviewing and interrogation techniques, arrest procedures, search and seizure, search warrant applications, and various other crimes and investigation techniques.

3. This affidavit is submitted in support of a criminal complaint charging Anthony Haynes with sex trafficking of a minor, in violation of Title 18, United States Code, § 1591(a) and (d). All of the information contained in this affidavit is the result of either my personal observations or investigation, or has been provided to me by other law enforcement officers, all of whom I believe to be reliable. This affidavit contains information to establish probable cause for a criminal complaint. It is not intended to list each and every fact observed or known during this investigation.

**II. Summary of the Evidence**

4. On March 30, 2017, the FBI Northwest Ohio Violent Crimes Against Children Task Force received information regarding the sexual exploitation of a juvenile in the Toledo, Ohio area. The juvenile is identified as Juvenile #1 (DOB: XX/XX/2000).

5. Law enforcement interviewed Juvenile #1 who detailed that Juvenile #1 was sexually exploited for the last three years, dating back to when Juvenile #1 was 14 years old, by Anthony

Haynes. Juvenile #1 specifically recalled one incident where Haynes transported Juvenile #1 to the apartment of an adult female, hereinafter referred to as FEMALE #1. While at the apartment, Haynes and FEMALE #1 began to engage in oral sex in front of Juvenile #1. After the incident, Haynes and FEMALE #1 told Juvenile #1 not to tell others about their activities and that these activities should be kept secret from others. Based on my training and experience, the behavior exhibited by Haynes is consistent with that of individuals involved in the sexual exploitation of juveniles. Haynes engaged in sexual activity in front of Juvenile #1 in an effort to sexualize Juvenile #1, so that Juvenile #1's inhibitions would be lowered when the time came for him to attempt to engage in sexual activity with Juvenile #1. These individuals often convey the need for secrecy and discretion with their victims to ensure they can continue sexually abusing them unabated.

6. After this incident, while Juvenile #1 was still 14 years old, Haynes began to sexually exploit Juvenile #1. Their first sexual encounter occurred when Haynes picked Juvenile #1 up from a friend's house and drove Juvenile #1 to an area church. FEMALE #1 was already at the church. Haynes instructed Juvenile #1 to undress which Juvenile #1 complied. Haynes then instructed FEMALE #1 to perform oral sex on Juvenile #1. While FEMALE #1 performed oral sex on Juvenile #1, Haynes touched Juvenile #1 suggestively and grabbed his penis over his clothes saying, "that's hot," referring to the oral sex.

7. From this point forward, Haynes routinely sexually exploited Juvenile #1. For example, Juvenile #1 recalled having oral sex with Haynes at an area church. While performing oral sex, Haynes pushed Juvenile #1's head down to his penis and recorded the incident using his cellular telephone. After the oral sex, they had intercourse that Juvenile #1 remembers being painful. Juvenile #1 attempted to pull away, but Haynes pulled Juvenile #1 close and told Juvenile #1 he would go slowly. Based on my training and experience, individuals involved in the sexual exploitation of children will record such degrading sexual acts and retain them for their own sexual gratification, and/or to use as leverage if needed to further coerce the victim to continued sexual activity.

8. Haynes had numerous subsequent sexual encounters with Juvenile #1. On occasion, Haynes took Juvenile #1 to local hotels or motels to have sex with Juvenile #1, including the Bel Air Motel, and a motel on Alexis Avenue, Toledo, Ohio. Their sexual encounters continued until as recently as March 2017.

9. In exchange for engaging in the sexual activity, Haynes routinely gave Juvenile #1 money. He would also instruct Juvenile #1 not to say anything. Additionally, he coerced Juvenile #1 into continued secrecy by implying revealing the sexual activity between them would ruin his family and church.

10. In addition to the sexual exploitation perpetrated by Haynes on Juvenile #1, Haynes facilitated Juvenile #1's sexual exploitation by several other adult males, who he would introduce Juvenile #1 to, and instruct Juvenile #1 as to how to act to further facilitate a sexual relationship with them. These males provided Juvenile #1 with money in exchange for the sexual activity. Haynes engaged in group sexual activity with some of these males, along with Juvenile #1. One of these males was identified by Juvenile #1 as Cordell Jenkins.

11. In September 2016, Haynes told Juvenile #1 that Jenkins wanted to talk to Juvenile #1. Around December 2016, Jenkins called Juvenile #1 and their conversation quickly turned sexual. Juvenile #1 told Haynes Juvenile #1 did not want to have sex with Jenkins and Juvenile #1 was afraid of him. Haynes told Juvenile #1 to not be a "punk" and coached Juvenile #1 on what to say to Jenkins to facilitate the sexual activity. Haynes told Juvenile #1 to send sexy/nude photographs and videos to Jenkins. Juvenile #1 complied with such requests and sent multiple pornographic images and at least one pornographic video of Juvenile #1 via text messages to Jenkins. Based on my training and experience it is common for individuals involved in sex trafficking to coach their victims as to how to behave and interact with potential clientele. By doing so, these victims become more marketable to potential clientele who would be willing to pay for sexual services.

12. In approximately February 2017, Jenkins picked up Juvenile #1 in his vehicle and drove Juvenile #1 to his residence. Jenkins approached Juvenile #1 once inside the residence, removed Juvenile #1's clothes, and made Juvenile #1 perform oral sex on him. Jenkins then proceeded to have sexual intercourse with Juvenile #1. Jenkins paid Juvenile #1 for the sex and referred to the payment as "hush money."

13. Jenkins continued to sexually exploit Juvenile #1 for the next couple of months. At times, Jenkins had sex with Juvenile #1 at his office at an area church. Jenkins took Juvenile #1 to the Red Roof Inn in Toledo on at least two occasions. The Red Roof Inn confirmed that on two occasions Jenkins reserved a room at the motel. Additionally, surveillance video from the motel clearly shows Jenkins and Juvenile #1 enter a motel room and leave about an hour later.

14. Jenkins pressured Juvenile #1 to find a friend for a threesome. Juvenile #1 asked Juvenile #1's friend, Juvenile #2, a minor, about Jenkin's requests for a threesome. On or about March 21, 2017, Jenkins picked up Juvenile #1 and Juvenile #2 and drove the minors to the Red Roof Inn. In the room, Jenkins had sexual intercourse with the two juveniles. Afterwards, Jenkins paid Juvenile #2 approximately \$120 to \$140. Again, surveillance video from the Red Roof Inn confirmed that Jenkins was there with at least one of the juveniles. In an interview, Juvenile #1

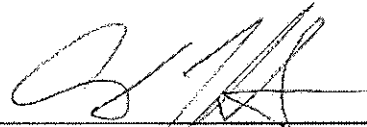
confirmed that the juvenile depicted in the video is Juvenile #1 exiting the rear driver's-side door of Jenkins' vehicle.

15. Other than the threesome occasion, Jenkins paid Juvenile #1 every time they had sex. The money ranged from \$100 to \$300 a time. The last time Jenkins had sex with Juvenile #1 was in late March 2017 at his office at an area church. Jenkins frequently recorded their sexual encounters on his cellular telephone.

16. Law enforcement reviewed two of Juvenile #1's cellular telephones and discovered text message communication between Juvenile #1 and Jenkins. These text messages show Jenkins requesting photographs and videos. Juvenile #1 sent numerous nude photographs exposing Juvenile #1's genitalia and buttocks, and also, a video of Juvenile #1 masturbating. Jenkins encouraged Juvenile #1, complimenting Juvenile #1 when she complied. Also, law enforcement found text messages from Jenkins corroborating Juvenile #1's statement that he directed Juvenile #1 to find a friend for a threesome. In one of these text messages, Jenkins sent Juvenile #1 a pornographic photograph depicting a sexual act. Jenkins further instructed Juvenile #1 that this is what he wanted Juvenile #1 and Juvenile #2 to do.

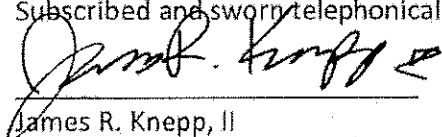
17. On March 31, 2017, law enforcement received consent to search Juvenile #2's telephone. According to Juvenile #2 and Juvenile #1, Juvenile #1 used Juvenile #2's telephone to send text messages to Haynes. On Juvenile #2's telephone, Juvenile #1 texted a cellular telephone number confirmed by investigators to be subscribed to by Haynes stating, "Im trying to save you, you need to delete your facebook notjust log out she has my phone again and she looking delete your account they getting the feds involved . . . Atleast if you delete our threat of messages will be erased !!! so hurry." Hanyes responded that he just deleted it. Based on my training and experience I know that child victims of sexual exploitation can have strong bonds with the perpetrators. Often times these victims will be conflicted when evidence of this illegal sexual activity arises. These victims may take steps to protect the perpetrator from prosecution to include tipping them off to a potential investigation or destroying evidence.

18. Based on the information contained herein, I believe probable cause exists that Anthony Haynes has violated Title 18, United States Code, 1591(a) and (d) by engaging in sex trafficking of a minor and attempting to obstruct such investigation.



SA Alex O. Hunt, FBI

Subscribed and sworn telephonically this 7th date of April, 2017 And by reliable electronic means.



James R. Knepp, II  
United States Magistrate Judge  
Northern District of Ohio – Western Division