

22-MJ-8104-PGL

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Lina Awad, having been duly sworn, hereby depose and state:

AGENT BACKGROUND

1. I am a Special Agent with United States Immigration and Customs Enforcement's Homeland Security Investigations ("HSI") and have been so employed since February 2009. I am currently assigned to the Office of the Special-Agent-in-Charge, Boston, Massachusetts. I am authorized to investigate crimes involving violations of Title 18, Title 8, Title 19, and Title 21 of the United States Code. I am a graduate of the Federal Law Enforcement Training Center in Glynco, Georgia, where I received training to become a federal agent. Specifically, I have received certification in the Criminal Investigator Training Program and the ICE Special Agent Training Program. I have received training relating to the trafficking in persons, including sex trafficking, and other offenses.

2. I have participated in investigations of human trafficking, human smuggling, alien harboring, border violations, drug and firearm trafficking, and related offenses. Many of these investigations have had national or international connections, and many required me to work closely and share information and intelligence with members of other federal, state, and local law enforcement agencies. I have debriefed, and continue to debrief, defendants, informants, and witnesses who have personal knowledge about human trafficking, including sex trafficking, and other crimes occurring in Massachusetts, nationally, and abroad.

3. From my training and experience, I know that individuals are trafficked for several purposes. Some forms of human trafficking involve involuntary servitude, peonage, debt bondage and slavery. Victims are often trafficked by force, fraud, and/or coercion. I am familiar with the federal laws regarding human trafficking, including 18 U.S.C. §§ 1591 and 1594 (Sex Trafficking).

4. This affidavit is submitted in support of a criminal complaint charging David Chris CANNON with Attempted Sex Trafficking of a Child, in violation of 18 U.S.C. §§ 1591(a)(1), (b)(2) and 1594(a).

5. As described below, there is probable cause to believe that, on November 3, 2022, in and around the greater Boston area, in the District of Massachusetts, David Chris CANNON did knowingly attempt to, in and affecting interstate and foreign commerce, entice, obtain, solicit, and patronize by any means a person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act.

6. This affidavit is based on my personal investigation and investigation by others, including federal and state law enforcement officials whom I know to be reliable and trustworthy. The facts contained herein have been obtained by conferring with other law enforcement officers and examining evidence obtained in the course of the investigation as well as through other means. This affidavit does not include every fact known to me about this investigation, but rather only those facts sufficient to establish probable cause.

STATEMENT OF FACTS

7. Beginning on or about November 1, 2022, law enforcement agents posted an advertisement (the “Advertisement”) on a website commonly used to advertise commercial sex acts.¹ The Advertisement indicated that the poster was in the area of Boston and Lowell, Massachusetts. The Advertisement contained images of what appeared to be two young females and the following language:

¹ Based on my training and experience, I know that the Internet is global network of computers, which is a means and facility of interstate commerce. I also know that the website on which the Advertisement was posted is maintained by an entity that is located outside of the United States, and the advertisements posted on that website are viewable outside of Massachusetts.

TIGHT, FRESH and ready for a GOOD TIME
Sweet and sexy duo here 4 a good time not a long time
Thirsty? We r wet and want to play with u
Ask about Fall specials and double trouble discount
NO BULLSHIT
NO COPS
100% independent

8. The Advertisement indicated that the person who would perform commercial sex acts was 18 years old.² The Advertisement also contained a contact phone number (the “Advertisement Number”). Law enforcement agents monitored this line and an undercover agent (“UC1”) used it to communicate with potential sex buyers, including CANNON.

9. On or about November 2, 2022, the Advertisement Number received a text message from a phone number ending in 3957 (the “3957 Number”) in response to the Advertisement. Thereafter, a text conversation between UC1 and the user of the 3957 Number ensued. UC1 stated that he/she had two minor girls—ages 12 and 14 years old—available to perform sex acts in exchange for money. UC1 indicated that it would cost \$200 for an hour with one of the girls or \$400 for an hour with both girls. CANNON, using the 3957 Number, indicated that he was interested in the 12 year old girl and asked if she was available Friday (November 4, 2022) at 7am. UC1 indicated he/she was not sure if they were still going to be around Friday morning but that he [CANNON] could reach out tomorrow (November 3, 2022). CANNON began texting UC1 from the 3957 Number starting at 5:59am on November 3, 2022. Between 6:00am and 10:30am, CANNON called or texted UC1 10 times without response from UC1. CANNON explicitly indicated that he could come anytime. UC1 responded at approximately 11:43am and began

² The law enforcement agents used a website that is known for containing prostitution advertisements but requires users to be at least 18 years old. Based on my training and experience, I know that this website and others like it have been used by traffickers to advertise the commercial sex acts of children under the age of 18.

chatting with CANNON again. CANNON indicated that he was interested in either girl and specifically asked who was going to be ready first. CANNON ultimately requested the girl who appeared in the ad to have longer hair, and UC1 indicated that that was her 14-year-old. The entire chat between CANNON and UC1 are attached:³

10. Shortly thereafter, CANNON arrived at a hotel in the greater Boston area.⁴ At the hotel, there was another undercover agent (“UC2”), who was posing as the person who posted the Advertisement and the user of the Advertisement Number. Surveillance agents observed the individual later identified as David Chris CANNON arrive in a 2018 silver Toyota RAV 4 with Massachusetts Plates 9HG199. He parked and walked directly over to UC2 in the hotel parking lot where they began having a conversation. CANNON was observed to be carrying a Black Android cell phone.

11. UC2 asked CANNON to show UC2 the cash to be paid for the commercial sex act. CANNON flashed a wad of cash from his pocket and showed it to UC2. UC2 gave CANNON a hotel key card and told him “no rough stuff” with her daughters. CANNON acknowledged UC2’s request and instructed UC2 to tell her daughter that he looked like Santa Claus but that he had just washed his beard so that it was not “grubby.”

12. Following the exchange of the cash and the foregoing discussion, law enforcement officers arrested CANNON and took him into custody. Incident to arrests, law enforcement agents searched CANNON and found a black Android cell phone. They dialed the 3957 Number but the phone did not ring.

³ Names and specific locations have been omitted.

⁴ The hotel is part of a national chain of hotels. Based on information provided by hotel staff, I know that the hotel has served out-of-state guests.

13. CANNON is a convicted sex offender. During a post-arrest interview, and after being advised of his *Miranda* rights, CANNON indicated he had never purchased sex and that he was merely out for a walk when a woman flagged him down.

CONCLUSION

14. Based on the foregoing, I respectfully submit that there is probable cause to support a criminal complaint charging David Chris CANNON with Attempted Sex Trafficking of a Child, in violation of 18 U.S.C. §§ 1591(a)(1), (b)(2) and 1594.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Lina Awad / by Paul G. Levenson
Lina Awad, Special Agent
Homeland Security Investigations

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by phone, on this 3rd day of November 2022, at Boston, MA.

Paul G. Levenson
HONORABLE PAUL G. LEVENSON
UNITED STATES MAGISTRATE JUDGE

