

22-MJ-8087-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 Dimitri Shawn MCKENZIE 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 2, 2022, in and around the greater Boston area, in the District of Massachusetts, Dimitri Shawn MCKENZIE 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.<sup>1</sup> 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

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<sup>1</sup> 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.

and the following language:

I AM A WOMAN seeking men  
TIGHT, FRESH, and ready 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.<sup>2</sup> The Advertisement also contained a contact phone number (the “Advertisement Number”). Law enforcement agents monitored this line and undercover agents (“UC1” and “UC2”) used it to communicate with potential sex buyers, including MCKENZIE.

9. On or about November 2, 2022, the Advertisement Number received a text message from a phone number ending in 9123 (the “9123 Number”) in response to the Advertisement. Thereafter, a text conversation between UC1 and the user of the 9123 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. MCKENZIE, using the 9123 Number, agreed to pay \$100 to have sex with the fictitious 14-year-old girl. At one point in the text conversation, as set forth below, UC2 took over for UC1 without informing MCKENZIE of the switch. Set forth below are MCKENZIE’S text communications with the undercover agents:<sup>3</sup>

9123 Number	Hey love 🍷
UC1	hey love. how u
9123 Number	I’m doing good how are you?
UC1	we are great. i got some girls itching to have some fun.

<sup>2</sup> 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.

<sup>3</sup> Names and specific locations have been omitted.

UC1	wanna hear the menu
9123 Number	Sure
UC1	I got couple young and fresh. [Name #1] 14 yo and [Name #2] 12 yo. one hour is \$400 with both or \$300 for 1
UC1	some things are lil extra
9123 Number	I'm not into anything under 18
UC1	ok no worries babe. hit me up if u change your mind
9123 Number	Feds
UC1	your the feds? u gotta tell me
9123 Number	Hell no
9123 Number	You Definitely are
UC1	nope. but just let us be. thanks
9123 Number	I only have 100
9123 Number	Could you do that
UC1	i could do it for one girl for 20 mins. so like a qv <sup>4</sup>
UC1	no extras
UC1	def no anal
UC1	wear condom
9123 Number	Ok
UC1	which girl. you like young and super tight or lil more experience with 14 yo
9123 Number	14
UC1	when u thinking sweetie
9123	930
UC1	and dont be screwing with me. we just trying make some money
9123 Number	Can you Verify
UC1	i can try send another pic or have her call you but like we aint on any of those sites cuz ya know
9123 Number	Send
UC1	u got real phone right cuz it dont send to that ap shit
9123 Number	Yeah
UC1	[sends photo of fictitious 14-year-old girl]
UC1	sent
9123 Number	How did you send it
UC1	texted.
9123 Number	Ok do you have a snap
UC1	look i got text and my girl is busy so u in or out
9123 Number	Im out I'm just really suspicious of this whole thing
9123 Number	What's the address
UC1	k
UC1	so are u in?

<sup>4</sup> Based on my training and experience, I understand "qv" to stand for "quick visit," which is commonly used in negotiating for commercial sex.

9123 Number	I just don't wanna go to jail man
UC1	and i dont fucking want to either. thats why u in or out cuz i dont need anyone drivin round drawing attention to my play
UC1	u commit. bring cash. i give u your 20 with girl and out. no attention
9123 Number	I'm not gonna draw attention, I just need to make sure either don't get in trouble for this. I need to be absolutely sure this is ok
9123 Number	What's the location
UC1	well thats how it usually works for us. we meet by back door. if i dont get serial killer vibe from u. u show me money. i show u room.
UC1	[Name of Massachusetts town] area
9123 Number	Where
UC1	dude u better not be fucking cop ugh
UC1	[Name of street #1] and [Name of street #2] area
9123 Number	You better not be a cop
UC1	i know i aint
9123 Number	and I know I ain't
9123 Number	I'm just trying to cover my ass man, you ain't show me any proof
UC1	i could say the same
UC1	and dont go send me a cock pic cuz i aint sending porn. thats some federal prison shit
9123 Number	Then I guess we in the same position
9123 Number	I ain't sending no cock pics
UC1	fair enough.
9123 Number	But you still ain't send an address
9123 Number	?
UC1	sorry was googling. [Address of hotel in Massachusetts town]
9123 Number	St
UC1	yeah
UC1	its a [Name of hotel brand]
9123 Number	So what back door you talking about?
UC1	dont go through front door. draws attention. Drive around back. U see some dumpster things
9123 Number	Is there anyway you can confirm you not the feds
UC1	Not the fukin feds... r u?
9123 Number	I'm not which is why I'm trying to make sure you're not
UC2	How? Like how would I know your not the cops or workin with em?
9123 Number	If I was the cops would I just show up and bust you
9123 Number	Why would I ask all these questions
UC2	WTF not really makin me feel good about u at all
9123 Number	SMH 🙄
UC2	I dunno ur tryna seem legit

9123 Number	I'm not a cop
9123 Number	WTF would I look like
9123 Number	I just don't wanna go to jail
UC2	Me either! Just trying to make some money. Don't wanna lose my girls and get busted either
9123 Number	I'm not a cop, just scared shitless of going to prison
9123 Number	Is there a way we both can both prove to be safe
UC2	Look I dunno what to tell u... I'm not a cop or affiliated. I'm taking a big risk meeting u too.
UC2	Like what?
9123 Number	None of you have Snapchat, we could video chat so I know you guys are legit
UC2	I dunno... then u could record me n my girls... had dudes try n blackmail me. If u wanna meet I'm outside now. If it's not for u than we can both stop wasting time
9123 Number	Snap chat tells you if you get screenshotted you will instantly know whether or I record you
9123 Number	And meet me outside where
UC2	I been burned on that before... don't tell me if ur recording it with something else
9123 Number	I'm leaving work I don't have anything else
UC2	In the parking lot
9123 Number	Please I want this I'm just scared
UC2	[22 second phone call to 9123 Number, no conversation]
UC2	[15 second phone call to 9123 Number, no conversation]
9123 Number	["phone call 1"]
9123 Number	Any update
9123 Number	[5 second phone call to UC2, no conversation]
9123 Number	Hey
9123 Number	You still there?
UC2	[sends photo of fictitious 14-year-old girl with current date in pen on her hand"]
9123 Number	I'm on my way
UC2	K
9123 Number	Where is all of this done
UC2	I'll meet u outside in the parking lot by the sude
UC2	I'm by my white Kia by the side door
9123 Number	I mean where is you know what done
UC2	We have a room at the hotel once I meet u n know ur cool u can go in and [Name #1] will be waiting for u
9123 Number	Ok
9123 Number	Can I ask you a question why did you just come out and say your daughters name and age
9123 Number	?

UC2	Cause I try n be upfront so if guys aren't into it they move on... not tryna get beat up
UC2	Met a few bad apples ya know
9123 Number	But what if you came across a cop, and tbh that's what made me skeptical
9123 Number	Lol I got one more question too
UC2	We got cops that r customers lol
UC2	What's ur question?
9123 Number	You don't spend time with anyone?
UC2	Nah hun I don't play
9123 Number	That's suspicious
9123 Number	and you don't ever get with customers
UC2	There's a bunch a girls my age out there... we make more money this way n I keep 'em safe
9123 Number	Why not?
UC2	Seriously dude I'm not tryna be rude but this is what we do... if ur not interested that's cool
9123 Number	I'm on my way rn
9123 Number	I'm just asking questions
UC2	Lol k just don't know if ur for real or just wanna talk
9123 Number	Nah I'm driving right now
UC2	K
9123 Number	So are we gonna talk before I go up
UC2	Yeah I just wanna make sure ur not a psycho or anything before I introduce u to [Name #1]
9123 Number	Yeah that's fine
UC2	R u close? I look like a fukin weirdo just standing around outside
9123 Number	Yeah a couple mins away I'm just gonna stop at an atm really quick
UC2	K if u wanna bring a lil extra to tip she appreciates that 😊
9123 Number	Ok,
UC2	U gettin close? Getting kinda chilly out here...
9123 Number	Yeah I'm like a minute away
UC2	K
9123 Number	On right side or left side
9123 Number	?
UC2	By the side door
UC2	I'm standing by my white Kia smoking
9123 Number	which side
9123 Number	Are you smoking a cigarette
UC2	Of the hotel? Yeah that me hun smoking

10. Using the 9123 Number, MCKENZIE called UC2 (identified as “phone call 1” in the chart above) and they had a conversation that lasted approximately six minutes and 12 seconds. During that conversation, both MCKENZIE and UC2 expressed concerns regarding whether either was a cop, saying they’d both been “burned” in the past. At the end of the call, MCKENZIE asked UC2 to send him a photo of the fictitious 14-year-old girl with a paper that included the current date.

11. Shortly thereafter, MCKENZIE arrived at a hotel in the greater Boston area.<sup>5</sup> At the hotel, UC2, who was posing as the person who posted the Advertisement and the user of the Advertisement Number, and MCKENZIE met in the hotel’s parking lot. UC2 asked MCKENZIE to show UC2 the cash to be paid for the commercial sex act. MCKENZIE flashed a wad of cash from his pocket and showed it to UC2. UC2 confirmed that MCKENZIE was paying for 20 minutes with the girl. MCKENZIE confirmed the arrangement. UC2 gave MCKENZIE a room number and started to hand him a room key card.

12. Following the exchange of the cash and the foregoing discussion, law enforcement officers arrested MCKENZIE and took him into custody. Incident to arrest, law enforcement agents searched MCKENZIE and found a cell phone. An agent then called the 9123 Number and observed that the cell phone they seized from MCKENZIE ring. Upon arrest, MCKENZIE gave law enforcement his phone number as a number that ended in 9015 (the “9015 Number”). An agent called the 9015 Number and observed the cell phone they seized from MCKENZIE ring, i.e., the same cell phone rang for both numbers.

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<sup>5</sup> 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.



**CONCLUSION**

13. Based on the foregoing, I respectfully submit that there is probable cause to support a criminal complaint charging Dimitri Shawn MCKENZIE 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 P-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 3<sup>rd</sup> day of November 2022, at Boston, MA.

  
HONORABLE PAUL G. LEVENSON  
UNITED STATES MAGISTRATE JUDGE

