

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Delaware

United States of America)

v.)

Dalian WASHINGTON)

Case No.)

17 - 74M)

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 August 2016 - January 2017 in the county of Kent in the District of Delaware, the defendant(s) violated:

Code Section	Offense Description
18 U.S.C. § 1591	Sex Trafficking of a Child
18 U.S.C. § 2243	Sexual Abuse of a Minor

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2017 MAR 31 PM 1:04

REDACTED

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2017 APR 13 AM 9:56

This criminal complaint is based on these facts:
See the attached affidavit.

Continued on the attached sheet.

Christopher Lake

Complainant's signature

Christopher Lake, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/31/2017

Mary Pat Thyng
Judge's signature

City and state: Wilmington, Delaware

Hon. Mary Pat Thyng, Chief U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Christopher Lake, being duly sworn, depose and state that the following information is true to the best of my knowledge, information, and belief:

INTRODUCTION AND BACKGROUND OF AFFIANT

1. I am a duly sworn member of the Federal Bureau of Investigation (“FBI”) and have been so employed since July of 2014. I am currently assigned to the Baltimore Field Office of the FBI, in Wilmington, Delaware. I have had formalized training at the FBI Academy in Quantico, Virginia. I have also received other specialized training regarding sex trafficking. As an FBI Special Agent, I am an “investigative or law enforcement officer of the United States” within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code.

2. I am currently assigned to the child exploitation investigation detailed in this Affidavit. I make this Affidavit is in support of a criminal complaint for (1) Dalian WASHINGTON, for Sex Trafficking of a Child, in violation of 18 U.S.C. § 1591(a), and Sexual Abuse of a Minor, in violation of 18 U.S.C. § 2243(a) and (2) Akeem BEAZER, for Sexual Abuse of a Minor, in violation of 18 U.S.C. § 2243(a).

3. All information contained in this Affidavit is either personally known by me or has been related to me by other law enforcement agents, unless otherwise indicated. Because this Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me

concerning this investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause that the defendants committed the specified federal crimes.

THE SPECIFIED FEDERAL OFFENSES

4. Pursuant to 18 U.S.C. § 1591(a) (Sex Trafficking of a Child), it is unlawful for a person to, within the special territorial jurisdiction of the United States, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, or solicit by any means a person, knowing that person has not attained the age of 18 years and will be caused to engage in a commercial sex act.

a. A “commercial sex act” means “any sex act, on account of which anything of value is given to or received by any person.” 18 U.S.C. § 1591(e)(3).

b. 18 U.S.C. § 1591(c) provides that “[i]n a prosecution . . . in which the defendant had a reasonable opportunity to observe the person so recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, or solicited, the Government need not prove that the defendant knew, or recklessly disregarded the fact, that the person has not obtained the age of 18 years.”

5. Pursuant to 18 U.S.C. § 2243 (Sexual Abuse of a Minor), it is unlawful for a person to, within the special territorial jurisdiction of the United States, knowingly engage in a sexual act with another person who has attained the age of 12 years but has not attained the age of 16 years and is at least four years younger than the person so engaging.

a. The Government need not prove that the defendant knew the age of the other person engaging in the sexual act or that the requisite age difference existed. 18 U.S.C. § 2243(d).

FACTS IN SUPPORT OF PROBABLE CAUSE

6. CHILD-1, a female, turned 16 years old on [REDACTED] 2016. In March 2017, CHILD-1 disclosed to a social worker that during the course of several months, when she was 15 and also when she was 16, she stayed on the Dover Air Force Base¹ and had sex with service members there. This disclosure led to an investigation by the United States Air Force Office of Special Investigations (“OSI”) and the Delaware State Police (“DSP”).

7. On March 16, 2017, OSI Special Agent Kia Byars and DSP Detective Michael Weinstein interviewed CHILD-1. Detective Weinstein knew CHILD-1 prior to this interview as a child with a troubled home life who often ran away from home and lived on the street.

8. CHILD-1 told investigators that she ran away from home in September 2016, when she was 15. She met up with a man she knew named [REDACTED]. She told [REDACTED] that she needed a place to stay. [REDACTED] offered to hook her up with a friend of his, who was an Air Force serviceman but that she would have to have sex with him. [REDACTED] then called his friend, who came and picked her up at a Delaware Division of Motor Vehicles (“DMV”) building. CHILD-1 said that

¹ I know that Dover Air Force Base is within the special territorial jurisdiction of the United States.

WASHINGTON was the man that picked her up and that he gave [REDACTED] approximately \$15.

9. WASHINGTON then took CHILD-1 back to his barracks on the Dover Air Force Base, where he had unprotected sex with her. Off and on for the next several months, CHILD-1 stayed in WASHINGTON's barracks on the base. They continued to have unprotected sex. WASHINGTON introduced CHILD-1 to a fellow serviceman, Akeem BEAZER ("BEAZER"), who went by the name "Woody." BEAZER also had sex with CHILD-1 on multiple occasions, both before and after she turned 16. During this time, both WASHINGTON and BEAZER brought CHILD-1 food from the dining hall. WASHINGTON would usually bring CHILD-1 food after work but sometimes, if she got particularly hungry, she would contact BEAZER and ask him to bring her food.

10. During the interview, CHILD-1 identified photographs of WASHINGTON and BEAZER. She said that after WASHINGTON picked her up at the DMV, she told WASHINGTON that she was 15 years old. In response, CHILD-1 said that WASHINGTON told her that was okay but that they couldn't tell anyone.

11. During the interview, CHILD-1 drew the layout of WASHINGTON's barracks, where she stayed. She detailed several articles of clothing that she had left in WASHINGTON's barracks, including a Ravens shirt.

12. [REDACTED]
[REDACTED]

[REDACTED]

13. WASHINGTON and BEAZER are both airmen with the United States Air Force and are assigned to the Dover Air Force Base in Dover, Delaware. WASHINGTON is 25 years old. BEAZER is 21 years old.

14. On March 29, 2017, Special Agent Byars and another OSI Special Agent interviewed WASHINGTON and BEAZER. At the beginning of the interviews, Special Agent Byars advised each WASHINGTON and BEAZER of their Miranda rights. Both waived Miranda and agreed to speak with investigators.

15. WASHINGTON said that he met CHILD-1 through a male known as [REDACTED] who was the father of a child by a woman who WASHINGTON was seeing. WASHINGTON said that that woman he was seeing did not want to have sex but that she told him she could get him someone. WASHINGTON then spoke with [REDACTED] who told WASHINGTON that he knew someone who was "trickin" and that if WASHINGTON would give him \$20, they would be "good to go."

16. WASHINGTON stated that he had never done "that" before, but that he had "no problem with that." Special Agent Byars asked WASHINGTON if he paid \$20 for CHILD-1. WASHINGTON replied, "yea, but I didn't feel right just doin' that so I got to know her first."

[REDACTED]

17. WASHINGTON said that he then had sex with CHILD-1, starting in August of 2016. When asked where the sex occurred, WASHINGTON initially advised that on one occasion, it took place in his dorm room on Dover Air Force Base. When confronted by Special Agent Byars that she had reason to believe that sex between WASHINGTON and CHILD-1 occurred more than one time in his dorm room, WASHINGTON stated that he had sex with her in his dorm room around three to four times.

18. WASHINGTON said that didn't pay CHILD-1 anything, but that he paid "██████" \$20 and that "██████" said he "got" CHILD-1. WASHINGTON advised that CHILD-1 said something to him about getting paid, and WASHINGTON stated that "██████" never said anything about paying CHILD-1. Following that discussion, WASHINGTON talked to "██████" who advised him that the next time CHILD-1 said something to him about being paid that WASHINGTON should let him ("██████" know. WASHINGTON said that "██████" was unaware that WASHINGTON and CHILD-1 had had a conversation in which WASHINGTON told CHILD-1 that he and she were going to be cool, and that if she needed help with something, she should let him know and he would see what he could do, but that obviously "██████" was saying something to CHILD-1, and CHILD-1 was coming to WASHINGTON, and that it made it look like WASHINGTON was about to get "ran for his money."

19. When asked by Special Agent Byars if "██████" was CHILD-1's pimp, WASHINGTON said, "By the sound of it, yes. That's what it sounded like." As far

as he knew, WASHINGTON said "[REDACTED]" was the person who was "trickin' [CHILD-1] off."

20. WASHINGTON stated that when he and CHILD-1 first met, she told him that she was 18 years old but that she later clarified she was 15 and about to turn 16 in October. WASHINGTON said that CHILD-1 told him she was 15 after the second time they had sex and that following that disclosure he continued to have sex with her.

21. WASHINGTON estimated the total number of times he had sex with CHILD-1 to be approximately four to six, with three to four times occurring prior to CHILD-1 meeting Akeem BEAZER and one to two times occurring after that.

22. WASHINGTON said that BEAZER told him that after BEAZER had sex with CHILD-1, CHILD-1 told BEAZER that she was 15. WASHINGTON said he and BEAZER then talked about how having sex with her wasn't a good idea.

23. WASHINGTON said that CHILD-1 would send him pictures of her naked body to tease him. WASHINGTON, in turn, said he sent one picture of himself naked to CHILD-1 to tease her. Early on, around August of 2016, WASHINGTON said he and CHILD-1 recorded CHILD-1 performing oral sex on WASHINGTON. When asked who recorded it, WASHINGTON said, "I did." WASHINGTON said he recorded it on his phone. WASHINGTON said he still had the video because he updated his phone and to do so he plugged his phone into his computer. When he plugged his phone into his computer, the video popped up.

24. When BEAZER was interviewed by Special Agent Byars and her partner, BEAZER said that he met CHILD-1 outside of a Safeway one night after he had received a message on Facebook asking him for help. BEAZER did not know the sender of the message, but he received a subsequent message from WASHINGTON stating that he needed BEAZER to help him go pick CHILD-1 up. When he and WASHINGTON arrived at the Safeway, they found CHILD-1 crying and saying that she had run away from her dad's house. BEAZER took WASHINGTON and CHILD-1 back to WASHINGTON's room.

25. WASHINGTON contacted BEAZER approximately two days later and asked him to get food for CHILD-1. When BEAZER arrived at the room, CHILD-1 was naked in WASHINGTON's room. BEAZER got her some of his clothes. Once she got dressed, he got her food from the bowling alley. After CHILD-1 had eaten, BEAZER took her to his room, which was also in base housing. BEAZER was playing online video games with his brothers, and when he turned around, CHILD-1 was naked on his bed. BEAZER tried to keep playing the game, but CHILD-1 kept messing with him so that he would notice her. BEAZER's brother told him not to be a punk because there was a naked girl in his bed. BEAZER stated that he and CHILD-1 had vaginal and oral sex and that he used a condom and ejaculated while inside CHILD-1. BEAZER clarified that the first condom he used broke but that he then put on another one.

26. According to BEAZER, the second time BEAZER and CHILD-1 had sex was in WASHINGTON's room on the Air Force Base. The sex was vaginal and then oral. BEAZER ejaculated, but CHILD-1 pulled him out just before.

27. According to BEAZER, he also had sex with CHILD-1 on three occasions outside of Dover Air Force Base. One instance was at her dad's house on New Year's Eve. BEAZER was there for approximately "five minutes" because during vaginal sex he observed CHILD-1's stomach and realized she was pregnant. CHILD-1 confirmed that she was pregnant, and BEAZER left.

28. According to BEAZER, another occasion was at a motel in Newark, Delaware. Prior to having sex, BEAZER gave CHILD-1 \$60 because she said she needed it. BEAZER recalled getting \$80 out of the ATM. He kept \$20 for himself and gave the remaining \$60 to CHILD-1. BEAZER maintained that the \$60 was not for sex but that he did expect to have sex with CHILD-1 that night. BEAZER advised that they talked for approximately "two minutes," and CHILD-1 unfastened his pants. CHILD-1 performed oral sex on BEAZER and then went to spit out his ejaculate. When she returned, they began to have vaginal sex. During the vaginal sex, CHILD-1 disclosed to BEAZER that she was working as a prostitute. BEAZER became mad and left. BEAZER said that CHILD-1 was wearing a wig and a nightgown and that there was a lot of makeup in the room. When arranging to meet up, BEAZER said that CHILD-1 told him he was going to get a phone call from someone but not to answer the call. BEAZER said CHILD-1 told him that he would then get a text message with a room number and that he should go to that

room number. BEAZER followed those instructions and that is how he met up with CHILD-1.

29. According to BEAZER, he also had sex with CHILD-1 on the side of a road. BEAZER advised that he and CHILD-1 stopped on the side of the road and had vaginal sex. BEAZER stated that the sex took place on the back right seat of his Chevrolet Malibu and that CHILD-1 was "doggy style" in the seat with her buttocks facing out of the car. BEAZER was standing outside of the vehicle. BEAZER further stated that he did not ejaculate and that halfway through he decided that it wasn't something he should be doing. BEAZER advised CHILD-1 was on her menstrual cycle during the intercourse and that blood got on the shirt he was wearing. BEAZER later threw that shirt away.

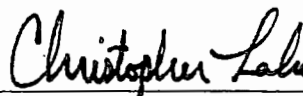
30. BEAZER stated that CHILD-1 told him that she was 16 years old, and that this disclosure occurred on the third occasion that he met her. BEAZER stated that CHILD-1's birthday was in [REDACTED], but he was unsure of the exact date.

31. Also on March 29, 2017, around the time of the interviews of WASHINGTON and BEAZER, Special Agent Byars observed WASHINGTON's dorm room at his barracks on Dover Air Force Base. It generally matched the layout drawn by CHILD-1. Special Agent Byars also recovered a Ravens shirt belonging to CHILD-1 from WASHINGTON's room. In addition, Special Agent Byars seized WASHINGTON's and BEAZER's cell phones and other electronics. The video depicting CHILD-1 performing oral sex on WASHINGTON was found, along with 157 naked images of CHILD-1.

CONCLUSION

32. Based on the information contained in this Affidavit, I believe probable cause exists that in the District of Delaware, Dalian WASHINGTON violated 18 U.S.C. § 1591 and § 2243 and Akeem BEAZER violated 18 U.S.C. § 2243. Therefore, I respectfully request that the Court issue criminal complaints charging those offenses.

Respectfully submitted,



Christopher Lake
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to me this 31 day of March, 2017.



THE HONORABLE MARY PAT THYNGE
CHIEF UNITED STATES MAGISTRATE JUDGE
DISTRICT OF DELAWARE