

CLERK OF DISTRICT COURT  
FIVE MOUNTAIN STATES

**ORIGINAL**

19 AUG 15 AM 8:33

FILED

BY *Wm. Miller*  
DEPUTY

Carolyn G. Mattingly  
Deputy County Attorney  
JOSHUA A. RACKI  
Cascade County Attorney  
121 4th Street North  
Great Falls, MT 59401  
Telephone: (406)454-6915

Attorneys for the State

**MONTANA EIGHTH JUDICIAL DISTRICT COURT, CASCADE COUNTY**

STATE OF MONTANA,	)	No. <b>CDC - 19 - 568</b>  <b>AFFIDAVIT, MOTION, AND ORDER FOR LEAVE TO FILE INFORMATION DIRECT</b>
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
BRANDON CAMERON SANDERS,	)	
	)	
Defendant.	)	
	)	

STATE OF MONTANA )  
: ss.  
County of Cascade )

The undersigned Deputy County Attorney of Cascade County, Montana, being first duly sworn, moves the Court for leave to File an Information charging the above-named defendant with:

COUNT I: TRAFFICKING OF PERSONS, a Felony, in violation of M.C.A. § 45-5-702(a)-(b).

COUNT II: AGGRAVATED PROMOTION OF PROSTITUTION, a Felony, in violation of M.C.A. § 45-5-603(c).

COUNT III: PROPERTY SUBJECT TO FORFEITURE -HUMAN TRAFFICKING, a Felony, in violation of M.C.A. § 45-5-707.

)

COUNT IV: CRIMINAL POSSESSION OF DANGEROUS DRUGS, a Misdemeanor, in violation of M.C.A. § 45-9-102.

COUNT V: CRIMINAL POSSESSION OF DRUG PARAPHERNALIA, a Misdemeanor, in violation of M.C.A. § 45-10-103.

Affiant has reviewed reports submitted by the Great Falls Police Department. These reports pertain to the events hereinafter described, and on the basis of the same, Affiant makes the allegations hereinafter set forth:

On 14 August 2019, at approximately 12:45 hours, Great Falls police responded to Motel Six (2 Treasure State Dr.) in Great Falls, Cascade County Montana, for a report of suspicious activity. The caller advised that a male was sitting in a vehicle in the parking lot of the Motel while the female entertained multiple male guests. The complainant, an employee at Motel Six, reported observing a male exited the room, go to the ATM, and return to the room. The complainant described the vehicle as a black Nissan Altima next to a boulder in the Motel Six parking lot. The caller could not see the license plate. Police responded and found the vehicle as described by the caller, with almost no other vehicles in the parking lot (North Carolina plate ##FKN1733). Motel Six employees reported to Dispatch that the room had been rented to a Brandon Sanders (02/23/1988).

Officers contacted the male in the Nissan Altima and informed him that there had been a report of a suspicious activity. The male was later identified as Brandon Sanders by his Illinois driver's license. Sanders denied any suspicious activity and accused officers of being racist, as he is African American. He refused to show officers his identification or identify himself. Sanders did try to show his

room key to Officer Levitt to prove he was a guest at the hotel. In observing the suspect's wallet, Officer Levitt noted that it had a large amount of cash in it, which he found to be suspicious, given the nature of the call.

Officers responded to the hotel lobby and spoke with the complainant, who reported that male and female rented room #216 the previous day. The two entered the room earlier in the day, and the male exited the room later and sat in his car in the parking lot. After the suspect went to his car, men started entering the hotel in quick succession, one at a time, and leaving after approximately fifteen minutes. The complainant saw the female enter the lobby with a male "John." They went up to the room and later returned to the lobby together, where the male used the ATM. The two then returned to the room after that.

Upon officers' arrival, the complainant noted that the "John" had departed a few minutes prior to their arrival. The complainant further informed officers that he found it suspicious that the suspects put a "Do Not Disturb" sign on their door. These signs are not authorized at Motel Six locations due to prior concerns of human trafficking occurring at the establishments throughout the United States. Officers posted by the door of the hotel room, where they could hear the shower going inside. Shortly thereafter, the female exited the room. Officers noted that her hair was dry, which they found to be suspicious, as they had just heard the shower going. The female (who refused to identify herself), insisted that she had to go to the lobby to talk to her husband. The female was later identified as T.W. As Officer Levitt initially made contact with T.W., he noted that she turned towards the stairs in an



attempt to avoid contact with him and elude any interaction. At the same time, Officer McAdam was ascending the top of the stairs, blocking the T.W.'s exit.

In speaking with officers, T.W. claimed that she and her husband had argued, and he exited the hotel to sit in his car in the parking lot. After that, T.W. reported that she swiped on someone on Tinder. She claimed that they were on vacation and intended to visit Glacier National Park. Additional officers responded to the scene to assist and noted that in plain view in the suspect vehicle, there was a child's car seat. In a protective sweep of the hotel room to verify the presence of any additional suspects or children, officers noted dirty wet wipes on the counters and q-tips that had the cotton tips torn off. Based on his training and experience, Officer McAdam knows that tearing the cotton tips of q-tips off is a common method drug that users employ to facilitate drug use. The cotton tips are commonly used to filter liquid narcotics in order to draw it into a syringe.

Officers Supalla and Crouch reviewed security footage from Motel Six, and Officer Crouch identified the "John" as Caleb Jeremy Schaeffer (DOB: 05-15-1981), based on prior knowledge. Through a Google search of Schaeffer, officers verified that he matched the suspected "John" in the surveillance footage. One photo even showed him wearing the same shirt he was wearing in the surveillance footage.

Detective Bambenek arranged to meet Schaeffer and made contact with him at the Target parking lot. Schaeffer agreed to speak with Detective Bambenek. He claimed that he received a text message earlier that day from an unknown Illinois phone number. The message included a nude photo of a female and inquired

whether he "wants some." Schaeffer agreed to meet the sender at Motel Six later that same day. He agreed to purchase a blow job from the female but only had \$260 on his person. He stated he had to go down to the ATM inside the hotel for an additional \$20 in cash. Officers later confirmed through surveillance footage that Schaeffer did visit the ATM inside the hotel lobby.

Officers sought and were granted search warrants for the Nissan Altima and room #216 at Motel Six by the Honorable Judge Parker. Upon searching the vehicle, officers located food and rental cars receipts, tissues, a parking ticket, hotel room keys, medical records documenting a recent local doctor's visit by T.W., a cell phone, clothing, cash, and food. The medical records were from the previous day at Great Falls Clinic and documented a medical issue which officers are aware is common to individuals who engage in sexual activity with multiple partners in a short period of time. Officers also located a small amount of marijuana, rolling papers, and a marijuana pipe in the vehicle, along with repair receipts for a vehicle.

In the hotel room, officers found unopened condoms, used condom wrappers, a small sex toy, a garbage bag full of used wet wipes, Walgreens passport photos of Sanders, a black TCL track-phone, a Macbook with charging and storage accessories, hospital records for T.W., and prescriptions for Sanders.

T.W. and Sanders were taken to the Great Falls Police Department for interviews. T.W. initially declined to speak with officers or identify herself. Upon being questioned, Sanders similarly refused to identify himself and declared that T.W. would not speak with officers unless he told her to speak with them. T.W.

eventually admitted to engaging in prostitution in Great Falls and other areas of the country. She stated that she and Sanders were married, and that she began engaging in prostitution for profit shortly after they began dating, before they married. She stated that Sanders kept the majority of the money she earned, but she attempted to save small amounts of it for herself without his knowledge as a backup plan to leave Sanders. She had saved \$300 so far. T.W. stated that they had recently arrived in Great Falls from Chicago. She indicated that when they travelled, she never drove, but rather, Sanders always drove in rental cars. T.W. stated that she is from Germany and had come to the United States to attend college.

T.W. stated that Sanders was her first boyfriend, and she was very naïve when they began dating. The prostitution began as an idea Sanders came up with for them to make more money. T.W. voiced a desire to return to her family in Germany. T.W. admitted to visiting the doctor's office the previous day in Great Falls, and despite her medical issue, continuing to engage in prostitution that day.

In speaking with officers, Sanders denied any suspicious activity and generally refused to identify himself. He continued to state that the entire situation was ridiculous and accused officers of being racist for stopping him in his vehicle outside a hotel. T.W.'s wallet and ID card were not on her person, but rather, were in the vehicle with Sanders in his possession. Based on his training and experience, Officer Bambenek knows that traffickers typically use tactics such as keeping victims' ID cards and wallets in their possession in order to maintain control over



the victims.

Sanders' phone was seized from his person, and the phone case/wallet contained almost \$1000 in cash.

Given the foregoing, the undersigned has probable cause to believe that the Defendant has engaged in activity constituting the offenses of:

COUNT I: TRAFFICKING OF PERSONS, a Felony, in violation of M.C.A. § 45-5-702(a)-(b).

COUNT II: AGGRAVATED PROMOTION OF PROSTITUTION, a Felony, in violation of M.C.A. § 45-5-603(c).

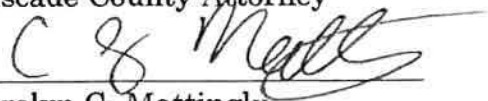
COUNT III: PROPERTY SUBJECT TO FORFEITURE -HUMAN TRAFFICKING, a Felony, in violation of M.C.A. § 45-5-707.

COUNT IV: CRIMINAL POSSESSION OF DANGEROUS DRUGS, a Misdemeanor, in violation of M.C.A. § 45-9-102.

COUNT V: CRIMINAL POSSESSION OF DRUG PARAPHERNALIA, a Misdemeanor, in violation of M.C.A. § 45-10-103.


DATED 14 August 2019.

JOSHUA A. RACKI  
Cascade County Attorney

  
Carolyn G. Mattingly  
Deputy County Attorney

SUBSCRIBED AND SWORN TO before me on the 14th day of August, 2019.



  
Notary Public for the State of Montana,  
Residing at Great Falls, Cascade County,  
Montana.

My commission expires 2/23



**ORDER**

Upon examining the foregoing Motion and Affidavit for Leave to File Information, and it appearing that there is probable cause to charge the above-named defendant as stated in the Information,

IT IS HEREBY ORDERED that the State of Montana is granted leave to file the Information as requested by the State's motion.

IT IS FURTHER ORDERED A WARRANT SHALL ISSUE FOR THE DEFENDANT'S ARREST.

DATED this 14<sup>th</sup> day of August, 2019, at Great Falls, Montana.



\_\_\_\_\_  
DISTRICT COURT JUDGE

cc: County Attorney/Carolyn G. Mattingly  
Defense Counsel c/o Public Defender's Office/  
Defendant - c/o Counsel  
GFPD/  
CCSO/warrants