

**STATE OF WISCONSIN      CIRCUIT COURT      MILWAUKEE COUNTY**

**STATE OF WISCONSIN**

**Plaintiff,**

**DA Case No.: 2025ML030619 Court**

**Case No.:**

**vs.**

**CRIMINAL COMPLAINT**

**DURANT JR III, JIMMY L**



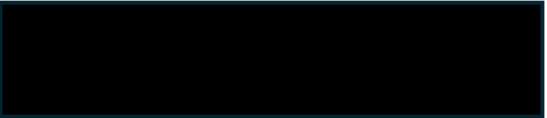
**HOPKINS, BRIAN R**



**RULE, DANTAVIA VERNARD**



**RUSSELL, MAURICE**



**Defendant(s).**

*For Official Use*

THE BELOW NAMED COMPLAINANT BEING DULY SWORN, ON INFORMATION AND BELIEF STATES THAT:

**Count 1: HUMAN TRAFFICKING** (As to defendant Jimmy L Durant Jr Iii)

The above-named defendant on or about January 2018 through present, at 10741 S. 27th Street, Franklin WI 53132, in the City of Franklin, Milwaukee County, Wisconsin, and City of Milwaukee, Milwaukee County, Wisconsin, did knowingly engage in human trafficking where the trafficking is for the purposes of a commercial sex act involving the victim, VVT, and the trafficking is done by causing or threatening to cause bodily harm to any individual, contrary to sec. 940.302(2)(a), 939.50(3)(d) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendants may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

**Count 2: HUMAN TRAFFICKING** (As to defendant Jimmy L Durant Jr Iii)

The above-named defendant on or about Summer 2020, at 10741 S. 27th Street, Franklin WI 53132, in the City of Franklin, Milwaukee County, Wisconsin, and City of Milwaukee, Milwaukee County, Wisconsin did knowingly engage in human trafficking where the trafficking is for the purposes of a commercial sex act involving the victim, TN, and the trafficking is done by Using any scheme, pattern, or other means to directly or indirectly coerce, threaten, or intimidate any individual, contrary to sec. 940.302(2)(a), 939.50(3)(d) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendants may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

**Count 3: HUMAN TRAFFICKING** (As to defendant Jimmy L Durant Jr Iii)

The above-named defendant on or about January 2022 through March 2022, at 10741 S. 27th Street, Franklin WI 53132, in the City of Franklin, Milwaukee County, Wisconsin, and City of Milwaukee, Milwaukee County, Wisconsin did knowingly engage in human trafficking where the trafficking is for the purposes of a commercial sex act involving the victim, MB, and the trafficking is done by Using any scheme, pattern, or other means to directly or indirectly coerce, threaten, or intimidate any individual, contrary to sec. 940.302(2)(a), 939.50(3)(d) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendants may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

**Count 4: HUMAN TRAFFICKING** (As to defendant Jimmy L Durant Jr Iii)

The above-named defendant on or about October 2019 through August 2022, at 10741 S. 27th Street, Franklin WI 53132, in the City of Franklin, Milwaukee County, Wisconsin, and City of Milwaukee, Milwaukee County, Wisconsin did knowingly engage in human trafficking where the trafficking is for the purposes of a commercial sex act involving the victim, KBW, and the trafficking is done by causing or threatening to cause bodily harm to any individual, contrary to sec. 940.302(2)(a), 939.50(3)(d) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendants may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

**Count 5: HUMAN TRAFFICKING** (As to defendant Dantavia Vernard Rule)

The above-named defendant on or about May 24, 2019 through October 2022, at 10741 S. 27th Street, Franklin WI 53132, in the City of Franklin, Milwaukee County, Wisconsin, and City of Milwaukee, Milwaukee County, Wisconsin did knowingly engage in human trafficking where the trafficking is for the purposes of a commercial sex act involving the victim, TJP, and the trafficking is done by Using any scheme, pattern, or other menas to directly or indirectly coerce, threaten, or intimidate any individual, contrary to sec. 940.302(2)(a), 939.50(3)(d) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendants may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

**Count 6: HUMAN TRAFFICKING** (As to defendant Dantavia Vernard Rule)

The above-named defendant on or about January 2022 through April 2025, at 10741 S. 27th Street, Franklin WI 53132, in the City of Franklin, Milwaukee County, Wisconsin, and City of Milwaukee, Milwaukee County, Wisconsin did knowingly engage in human trafficking where the trafficking is for the purposes of a commercial sex act involving the victim, MD, and the trafficking is done by causing or threatening to cause bodily harm to any individual, contrary to sec. 940.302(2)(a), 939.50(3)(d) Wis. Stats.

Upon conviction for this offense, a Class D Felony, the defendants may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

**Count 7: MISDEMEANOR BATTERY, DOMESTIC ABUSE ASSESSMENTS** (As to defendant Dantavia Vernard Rule)

The above-named defendant on or about Friday, May 26, 2023, at 700 East Kilbourn Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, did cause bodily harm to MD, by an act done with intent to cause bodily harm to that person, without that person's consent, contrary to sec. 940.19(1), 939.51(3)(a), 973.055(1) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendants may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

And further, invoking the provisions of sec. 973.055(1) Wis. Stats., because this charge is an act of domestic abuse, the court shall impose the domestic abuse assessment of \$100 for this offense because this charge is an enumerated crime under sec. 973.055(1)(a)1, Wis. Stats., and the conduct constituting the violation involved an act by the defendant against his or her spouse, against an adult with whom the defendant resides or formerly resided, or against an adult with whom the defendant has created a child.

**Count 8: DISORDERLY CONDUCT, DOMESTIC ABUSE ASSESSMENTS** (As to defendant Dantavia Vernard Rule)

The above-named defendant on or about Friday, May 26, 2023, at 700 East Kilbourn Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, in a public or private place, engages in violent, abusive, indecent, profane, boisterous, unreasonably loud or otherwise disorderly conduct under circumstances in which the conduct tends to cause or provoke a disturbance, contrary to sec. 947.01(1), 939.51(3)(b), 973.055(1) Wis. Stats.

Upon conviction for this offense, a Class B Misdemeanor, the defendants may be fined not more than One Thousand Dollars (\$1,000), or imprisoned not more than ninety (90) days, or both.

And further, invoking the provisions of sec. 973.055(1) Wis. Stats., because this charge is an act of domestic abuse, the court shall impose the domestic abuse assessment of \$100 for this offense because this charge is an enumerated crime under sec. 973.055(1)(a)1, Wis. Stats., and the conduct constituting the violation involved an act by the defendant against his or her spouse, against an adult with whom the defendant resides or formerly resided, or against an adult with whom the defendant has created a child.

**Count 9: FALSE IMPRISONMENT, DOMESTIC ABUSE ASSESSMENTS** (As to defendant Dantavia Vernard Rule)

The above-named defendant on or about Wednesday, February 14, 2024, at 8600 North Deerwod Drive, in the Village of Brown Deer, Milwaukee County, Wisconsin, did intentionally confine MD, without that person's consent, and with knowledge that he had no lawful authority to do so, contrary to sec. 940.30, 939.50(3)(h), 973.055(1) Wis. Stats.

Upon conviction for this offense, a Class H Felony, the defendants may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

And further, invoking the provisions of sec. 973.055(1) Wis. Stats., because this charge is an act of domestic abuse, the court shall impose the domestic abuse assessment of \$100 for this offense because this charge is an enumerated crime under sec. 973.055(1)(a)1, Wis. Stats., and the conduct constituting the violation involved an act by the defendant against his or her spouse, against an adult with whom the defendant resides or formerly resided, or against an adult with whom the defendant has created a child.

**Count 10: MISDEMEANOR BATTERY, DOMESTIC ABUSE ASSESSMENTS** (As to defendant Dantavia Vernard Rule)

The above-named defendant on or about Wednesday, February 14, 2024, at 8600 North Deerwod Drive, in the Village of Brown Deer, Milwaukee County, Wisconsin, did cause bodily harm to MD, by an act done with intent to cause bodily harm to that person, without that person's consent, contrary to sec. 940.19(1), 939.51(3)(a), 973.055(1) Wis. Stats.

Upon conviction for this offense, a Class A Misdemeanor, the defendants may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than nine (9) months, or both.

And further, invoking the provisions of sec. 973.055(1) Wis. Stats., because this charge is an act of domestic abuse, the court shall impose the domestic abuse assessment of \$100 for this offense because this charge is an enumerated crime under sec. 973.055(1)(a)1, Wis. Stats., and the conduct constituting the violation involved an act by the defendant against his or her spouse, against an adult with whom the defendant resides or formerly resided, or against an adult with whom the defendant has created a child.

**Count 11: DISORDERLY CONDUCT, DOMESTIC ABUSE ASSESSMENTS** (As to defendant Dantavia Vernard Rule)

The above-named defendant on or about Wednesday, February 14, 2024, at 8600 North Deerwod Drive, in the Village of Brown Deer, Milwaukee County, Wisconsin, in a public or private place, engages in violent, abusive, indecent, profane, boisterous, unreasonably loud or otherwise disorderly conduct under circumstances in which the conduct tends to cause or provoke a disturbance, contrary to sec. 947.01(1), 939.51(3)(b), 973.055(1) Wis. Stats.

Upon conviction for this offense, a Class B Misdemeanor, the defendants may be fined not more than One Thousand Dollars (\$1,000), or imprisoned not more than ninety (90) days, or both.

And further, invoking the provisions of sec. 973.055(1) Wis. Stats., because this charge is an act of domestic abuse, the court shall impose the domestic abuse assessment of \$100 for this offense because this charge is an enumerated crime under sec. 973.055(1)(a)1, Wis. Stats., and the conduct constituting the violation involved an act by the defendant against his or her spouse, against an adult with whom the defendant resides or formerly resided, or against an adult with whom the defendant has created a child.

**Count 12: STRANGULATION & SUFFOCATION, DOMESTIC ABUSE ASSESSMENTS** (As to defendant Dantavia Vernard Rule)

The above-named defendant on or about Monday, February 12, 2024, at 8600 North Deerwood Drive, in the Village of Brown Deer, Milwaukee County, Wisconsin, did intentionally impede the normal breathing by applying pressure on the neck of MD, contrary to sec. 940.235(1), 939.50(3)(h), 973.055(1) Wis. Stats.

Upon conviction for this offense, a Class H Felony, the defendants may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

And further, invoking the provisions of sec. 973.055(1) Wis. Stats., because this charge is an act of domestic abuse, the court shall impose the domestic abuse assessment of \$100 for this offense because this charge is an enumerated crime under sec. 973.055(1)(a)1, Wis. Stats., and the conduct constituting the violation involved an act by the defendant against his or her spouse, against an adult with whom the defendant resides or formerly resided, or against an adult with whom the defendant has created a child.

**Count 13: FELONY INTIMIDATION OF A VICTIM, DOMESTIC ABUSE ASSESSMENTS** (As to defendant Dantavia Vernard Rule)

The above-named defendant on or about Thursday, February 15, 2024, at 949 North 9th Street, Milwaukee WI 53233, in the City of Milwaukee, Milwaukee County, Wisconsin, knowingly and maliciously did dissuade MD, who has been the victim of a crime, from causing a complaint, indictment or information to be sought or prosecuted, or from assisting in the prosecution thereof, where the underlying crime is an act of domestic abuse, as defined in s. 968.075 (1) (a), that constitutes the commission of a crime or a crime that, following a conviction, is subject to the surcharge in s. 973.055, contrary to sec. 940.45(7), 939.50(3)(g), 973.055(1) Wis. Stats.

Upon conviction for this offense, a Class G Felony, the defendants may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than ten (10) years, or both.

And further, invoking the provisions of sec. 973.055(1) Wis. Stats., because this charge is an act of domestic abuse, the court shall impose the domestic abuse assessment of \$100 for this offense because this charge is an enumerated crime under sec. 973.055(1)(a)1, Wis. Stats., and the conduct constituting the violation involved an act by the defendant against his or her spouse, against an adult

with whom the defendant resides or formerly resided, or against an adult with whom the defendant has created a child.

**Count 14: RECEIVE COMPENSATION FOR HUMAN TRAFFICKING** (As to defendant Dantavia Vernard Rule)

The above-named defendant on or about January 2023 through July 2023, at 700 East Kilbourn Avenue, in the City of Milwaukee, Milwaukee County, Wisconsin, and City of Milwaukee, Milwaukee County, Wisconsin did knowingly receive compensation from the earnings of debt bondage, a prostitute, or a commercial sex act, as described in s. 940.302(1) (a) 1. and 2, contrary to sec. 940.302(2)(c), 939.50(3)(f) Wis. Stats.

Upon conviction for this offense, a Class F Felony, the defendants may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

**Count 15: RECEIVE COMPENSATION FOR HUMAN TRAFFICKING** (As to defendant Maurice Russell)

The above-named defendant on or about January 2020 through January 2022, at 10741 S. 27th Street, Franklin WI 53132, in the City of Franklin, Milwaukee County, Wisconsin, 401 W. Michigan Street, Milwaukee, Wisconsin, and City of Milwaukee, Milwaukee County, Wisconsin did knowingly receive compensation from the earnings of debt bondage, a prostitute, or a commercial sex act, as described in s. 940.302(1) (a) 1. and 2, contrary to sec. 940.302(2)(c), 939.50(3)(f) Wis. Stats.

Upon conviction for this offense, a Class F Felony, the defendants may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

**Count 16: RECEIVE COMPENSATION FOR HUMAN TRAFFICKING** (As to defendant Maurice Russell)

The above-named defendant on or about February 2021 through present, at 10741 S. 27th Street, Franklin WI 53132, in the City of Franklin, Milwaukee County, Wisconsin, 1721 W Canal Street, Milwaukee, Wisconsin, and City of Milwaukee, Milwaukee County, Wisconsin did knowingly receive compensation from the earnings of debt bondage, a prostitute, or a commercial sex act, as described in s. 940.302(1) (a) 1. and 2, contrary to sec. 940.302(2)(c), 939.50(3)(f) Wis. Stats.

Upon conviction for this offense, a Class F Felony, the defendants may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

**Count 17: KEEPING PLACE OF PROSTITUTION** (As to defendant Brian R Hopkins)

The above-named defendant on or about January 2020 through present, at 10741 S. 27th Street, Franklin WI 53132, in the City of Franklin, Milwaukee County, Wisconsin, did intentionally keep a place of prostitution, contrary to sec. 944.34(1), 939.50(3)(h) Wis. Stats.

Upon conviction for this offense, a Class H Felony, the defendants may be fined not more than Ten Thousand Dollars (\$10,000), or imprisoned not more than six (6) years, or both.

**Probable Cause:**

Complainant is a Franklin Police Officer and bases this complaint upon official Franklin Police Department Incident Reports, Federal Bureau of Investigation Agent Reports, and Internal Revenue Services – Criminal Investigation Agent Reports. Complainant has relied on such reports in the past and has found them to be truthful, accurate, and regularly relied upon in the course of that department's business. Such incident reports indicate the following:

On February 27, 2020, a former employee of On The Border Gentlemen's Club, located at 10741 S. 27th Street, Franklin, Wisconsin, informed law enforcement that employers at On The Border, hereinafter OTB, were benefitting from commercial sexual acts in the club. This information ignited a five-year investigation that has resulted in the below information.

**CHARGES RELATED TO JIMMY LEE DURANT JR "FLY" (DOB: 02/12/1994)**

On November 5, 2021, FBI Milwaukee was informed by the Milwaukee Police Department regarding an anonymous tip they received alleging that prostitution, drug dealing, illegal firearms, and Paycheck Protection Program (PPP) loan fraud was occurring at 401 West Michigan Street Apartment #406, Milwaukee, Wisconsin. The tip alleged that \$800,000 in cash was being stored at the West Michigan address. The tip also claimed that the "top four" women listed on EROS.com, a website used for commercial sex advertisements, were associated with the West Michigan address.

Included in the anonymous tip was a screenshot from an Instagram account under the name RULEYRULE capturing a photo that depicted four black males. Based on publicly available opensource social media account information and department of transportation photos, three of the individuals were identified as JIMMY DURANT JR aka "FLY", DANTAVIA RULE aka "RULE", and MAURICE RUSSELL aka "RUSS."

Case agents began working to follow up on this tip. They learned that FLY, RULE, and RUSS, and several females associated with them, were known to make fairly frequent trips out of the State of Wisconsin to places like Miami, Florida and New Orleans, Louisiana, where they would rent Airbnb properties and stay for some length of time. Case agents also discovered that many of the females associated with FLY, RULE, and RUSS were posted on known commercial sex websites such as Skipthegames.com and Megapersonals.com.

RUSS was listed on the lease for Apartment #406 at 401 W. Michigan Avenue, Milwaukee Wisconsin. Surveillance was conducted outside of the 401 W. Michigan Avenue apartment building where RUSS and/or associated females were seen coming and going, and often times in luxury vehicles.

These same luxury vehicles were also observed on social media posts and videos by the subjects and associated females. On June 5, 2022, law enforcement observed a Facebook video posted by FLY showing FLY, RUSS, and luxury vehicles outside of the 401 W. Michigan Avenue apartment building. In

this video, FLY is observed standing on one of the vehicles pouring out champagne and saying “hey man, mother fuckers back in town...lock your doors and hide your hoes, I’m back in town...a bitch die to give me her mother fuck’n purse...all the way from the Mississippi coast to the Milwaukee snow, man”. FLY also displays the jewelry he is wearing, which includes a custom ring saying “FLYVIO”. In addition, a photo on FLY’s Facebook page shows RULE, FLY, and RUSS in front of one of the vehicles with RULE displaying a firearm.

FBI and IRS-CI agents, along with local law enforcement, have identified FLY, aka Flyvio, as a self-proclaimed entrepreneur who has multiple registered businesses in his name; however, these businesses do not have a physical or online presence to support the amount of money moving through bank accounts; therefore, law enforcement believes FLY created these businesses as a means to legitimize the source of his money and channel it through various personal and business bank accounts. In addition, no employment records for FLY in Wisconsin have been located.

Law enforcement reviewed FLY’s Instagram account which consists of photos and videos from high-rise apartments, getting tattoos, screenshots of his investments and credit score, photos and videos of FLY wearing expensive watches and jewelry as well as carrying a designer bag filled with cash, bundles of hundred dollar bills laying on a table, dinners at pricy restaurants, at the gun range with various solid gold plated weapons, multiple vehicles including a Lamborghini, Austin Martin, Porsche, BMW i8, and Maserati Sao Paulo. In addition, a photo of himself in front of a dark colored Bentley stating “Bentleys & Billions all off of bitches & brilliance.”

A search warrant for FLY’s Instagram account was executed and the below messages discussing trafficking women were discovered:

Conversation with account handle Head Hooch on January 03, 2020 at 4:15 PM.

- Flyvio: Bro I need my credit fixed I can’t even get a fucking apartment up here I need an apartment man I got bitches lol ima pimp now (emoji) lmaoo fr tho
- Head Hooch: Iight I got u
- Flybio: Bet no procrstinating this our year fool we been down too gotdamn long.

Same conversation thread as above on May 23, 2020 at 6:26 AM.

- Flyvio: Lmao got to get the big money tricks out of the strip clubs plus I suppose to update the hoes life big bro that’s what my program about elevation and doin better in life.

Conversation with account handle \_xo.90s and Flyvio on December 03, 2020 at 3:11PM. ●

\_xo.90s: What’s the “goog” club u was talking about out there?

- Flyvio: if your eyez on the prize your gonna do what it takes to get the prize and keep it... n it’s called (otb) on the boarder.
- \_xo.90s: True (100 emoji)...slow down thou grasshopper (emoji) I gotta make sure you worth the risk.
- Flybio: Lol I told u let me know whn u ready ain never rush u... for one example what’s ment to Happen gone happen n u can’t rush greatness plus Every risk u take is worth taking chances



make champions you could never lose taking risk cus the most valuable thing You can earn from a risk is a lesson.

- \_xo.90s: And this club is the best because? (emoji) ● \_xo.90s: how many casinos is out there?
- Flyvio: **One that's iknow of and otb where I send my bitches too n the sites and dating apps** but shit cool slowed down cus shorty got fired out the club but a nigga was just around longer cus tryna put this store together but I usually be on the road.

Conversation with account handle bhiebecchbcbjca and Flyvio on July 14, 2021 at 8:32 AM. ●

Flyvio: U never talked to yo boy for me either ...Carlos about mocha

- b: I actually talked to everyone about her coming back. Tammy wants her back because she loves moca . Carlos has no say in it . Moca needs to talk to brain about her job back he might make her pay a tip to come back which is ridiculous.
- bn: Brain just watch me fight a bitch in his face so he not talking to me right now
- Flyvio: Nigga not answering the phone n Carlos not letting her back to there talk to him plus she been gone from that job dam near a while year
- b: I'm finna go back n talk to Carlos maybe if we give him money instead of Brian
- ...
- Flyvio: Don't forget to put that word in for me for moca tell the chump to name His price of that helps
- ...
- Flyvio: Mayanauh Lowe..... see can u get her in otb for me

Mocha, mentioned above, is later listed as a victim of human trafficking under FLY. ML, mentioned above, is later listed as a victim of human trafficking under RUSS. Carlos, mentioned above, is Carlos Marchan who was head of security at OTB but acted in a managerial role. Brian, mentioned above, is Brian Hopkins mentioned later on in this complaint, was one of the head managers at OTB.

Conversation with account handle Cude and Flyvio on March 03, 2023 at 8:36 AM.

- Cude: I don't know you but I'm familiar with the game I may not know details but I have an idea. And maybe I'm wrong shit honestly it's none of my business as of rn. But HB
- Flyvio: U got an ideal of the game I wouldn't say familiar.. heart breakers eww why not downtown silk or otb
- Cude: I can't work at silk downtown rn which sucks that was my favorite club & otb was acting like they wouldn't hire me idk but I do want to try again but that's the only club I ever applied at that acted funky about hiring me and I travel to different states to work so idk..
- Flyvio: Perry !! Why u can't work there n **I can get u in otb.**

In addition to the conversations above, there are messages observed by law enforcement between FLY and numerous unknown females talking about how FLY is a pimp. Based on law enforcement's training and experience, it appears that FLY is attempting to recruit these unknown females in the messages.

**COUNT 1: VT VICTIM OF HUMAN TRAFFICKING (940.302(2)(a)). JANUARY 2018 – PRESENT.**

VT (DOB: 08/23/2000) is known by other victims as FLY's bottom. KW (referred to later as victim under FLY), disclosed to law enforcement that FLY is from Mississippi, and in 2018, VT reached out to FLY via social media and told him that there are good opportunities in Milwaukee for pimps to make money. FLY then moved to Milwaukee and started to traffic VT.

Based on complainant's training and experience, "bottom" is a common term used to describe human trafficking hierarchy. When an individual is a "bottom" that typically means they have been with the trafficker the longest and have earned the trafficker's trust. Bottoms are trusted to recruit other girls, implement punishment on other victims, and collect money from other victims on behalf of the trafficker.

VT disclosed that someone else made a bank account for her and has access to that account. VT disclosed that her information was used to apply for a PPP loan but she is not the one who applied, and she did not receive the money from the PPP loan. VT said that she had a boutique business named "Flyvio." Flyvio is used on FLY's social media accounts and is often what he refers to himself as. Commercial sex advertisements for VT have been recovered from the escort website models-world.com and FLY's email account, jflyvio@gmail.com, was used as contact information.

Based on statements made by several of the victims listed below, VT would conduct commercial sex dates, and acts, under FLY's direction not only at OTB, but at residences all throughout Milwaukee, Wisconsin and various other States. VT would hand over all of the money she made from commercial sex acts to FLY. If VT did not follow FLY's rules, or "disrespected" him he would use physical abuse to get VT to obey. Several other victims listed below observed FLY physically abuse VT.

**COUNT 2: TN VICTIM OF HUMAN TRAFFICKING (940.302(2)(j/g)). SUMMER 2020.**

TN (DOB: 03/24/1999) reported meeting FLY on social media. TN posted online that she was struggling in a bad relationship and FLY reached out. In the summer of 2020 FLY talked to a house parent at OTB and got TN a job. Based on complainant's training and experience, a "house parent" is a staff member at OTB who manages the dressing room and acts as a supervisor and mentor to the dancers. TN later found out that FLY paid HOPKINS, OTB manager, \$500 for her to get hired at OTB.

FLY sold TN the idea of a better life and that he was going to help her out. FLY provided TN with an apartment. Soon enough TN was working 12-hour shifts at OTB as a dancer and would make roughly \$1200 per day. TN would bring the money she earned at OTB home to the apartment and in the morning the money would be gone. FLY told TN that he was going to put the money in a trust for her to help her with her future.

VT showed TN what was expected of her and TN now feels she was groomed by VT. TN reported having to share her location with FLY. She had to ask him if she wanted food and clothes. TN said it was never an option for her to not give over the money she made during the day. If TN did not hand over all of her money to FLY, VT would tell FLY because VT would know how much TN was paid

out at OTB. TN knew that FLY did not have an alternate source of income meaning FLY was not employed.

TN started to hide money on the side so she could get out. She had to hide it on her person since FLY would search her purse. Once TN left FLY, she asked him about the money she earned that he kept and he compared it to college. "You pay to go to college but if you don't finish you don't get your money back."

**COUNT 3: MB VICTIM OF HUMAN TRAFFICKING (940.302(2)(j)(L)). JANUARY 2022 - MARCH 2022.**

MB (DOB: 05/20/2002) reported to law enforcement that she first started working at OTB in January of 2022 when she was 19 years old. MB estimates she worked there for one to two months prior to quitting. MB reports that there were "shady" things going on at OTB. MB knows that the bouncers were paid to turn the lights off in the VIP rooms so girls could do "tricks" in the VIP rooms. A "trick" is a commercial sex act itself or a customer or client who pays for commercial sex acts. MB was told by a customer that employees could do tricks. MB performed a sex act with a customer with the lights on and was told by management she could only do so with the lights down.

At that time, MB was introduced to FLY by VT. MB was told that FLY could elevate her life so she agreed to move in with FLY and VT. MB thought she was only going to be dancing, and FLY would help elevate her. MB lived with FLY at 735 W. Wisconsin Avenue, Milwaukee, WI for a few days and her life was not elevated. MB estimates she made a few thousand dollars in those days doing both incall and outcall dates performing sex acts for FLY. Based on complainant's training and experience he knows that "in call" means when a client travels to the subject who is posting about sex acts, and "out call" means when the person who is posting about the sexual acts travels to the client. MB also had to work the phones and post commercial sex advertisements. Based on complainant's training and experience, "working the phones" means to coordinate outcalls with possible clients.

MB's customers would either pay FLY or VT prior to meeting MB. MB never received any of the money she earned. MB contacted her ex-boyfriend who pretended to be a trick and that is how MB was able to get away.

FLY had rules for MB: do not use drugs, do not drink alcohol, no cussing, no disrespect to FLY, walk behind them, always wear a condom, and turn tricks and give FLY and VT the money. MB did not break any of the rules so she is not sure what would happen if she had. However, MB observed VT and KW shake out of fear because they were so scared of FLY.

MB was trafficked by FLY a second time. MB was introduced to crack cocaine when she was 15 years old by her previous human trafficker. The second time she was trafficked by FLY, MB had relapsed on drugs. FLY reached out to MB and she met up with FLY in Milwaukee, Wisconsin. FLY then drove MB and VT to Chicago, IL for one week where MB made \$3000 - \$5000 in one weekend turning tricks. MB performed two girl specials with VT in a hotel in Chicago, IL. MB had to turn over money she made to VT who then gave the money to FLY. When the phones were slow, FLY made MB and VT walk the strip

in the freezing rain. MB did not receive any of the money she earned during that timeframe. MB did not want to sell her body so she left.

**COUNT 4: KW VICTIM OF HUMAN TRAFFICKING (940.302(2)(a)). OCTOBER 2019 - AUGUST 2022.**

In December 2021 commercial sex advertisements were discovered on Eros.com depicting KW (DOB: 10/12/2001). The advertisement stated “hi guys im new here... im down for a movie magical fun time... im safe discreet and 100 percent real... I offer Facetime verification... by contacting you agree that you are not affiliated with any law enforcements and that all donations are for time and companionship only anything else that may occur is solely between two consenting adults.” A client of KW’s left a review in November 2021 stating, “She wants 350 for 30 min. Im not going to pay that. If you do, give her a call or a text.”

Additional advertisements for KW with the same advertisement language were located on Callescort.org, Listcrawler.eu, Megapersonals.eu, Adultsearch.com, Models-world.com, Erosescorts.net, Onebackpage.com, and Skipthegames.com from November 2021 through December 2021. The advertisements say KW is available in Milwaukee, Wisconsin and Chicago, Illinois. Upon searching the images that were posted in the advertisements, additional advertisements were posted in January 2021 from Fort Lauderdale, Florida, Miami, Florida, and New Orleans, Louisiana.

FLY’s email account, jflyvio@gmail.com, was used as contact information for the commercial sex advertisements posted on the escort website models-world.com.

In May 2022, Miami, Florida human trafficking detectives were working undercover in an attempt to locate victims and subjects of human trafficking. An advertisement was located online which depicted a young female that had several indicators of human trafficking. Law enforcement contacted the number in the advertisement and the female responded that she was available for the date. Detectives made contact with the female who was identified as KW. KW told detectives that she was trying to get into the modeling industry, but was having difficulty. KW denied being forced to work commercial sex dates. As detectives were leaving, KW asked detectives for a hug stating “I don’t know if you do, but I really need a hug right now.”

In August 2022, the Holmes County Sheriff’s Office located in Holmes County, Mississippi were dispatched to a complaint that a woman was crying and out of control at a gas station. The young female that was encountered was KW. KW informed law enforcement that she was being sex trafficked by FLY. KW stated they had come from Milwaukee, Wisconsin to Durant, Mississippi. KW disclosed that she was being forced to have sexual intercourse with FLY’s buddies at an Inn. KW stated there are two other girls being trafficked and only knew the name of VT.

KW told law enforcement that she began dancing at the Airport Lounge located in Milwaukee, WI when she was 18 years old. KW was approached by VT and stayed the night at VT’s apartment. The next day, VT told KW they were going to New Orleans, LA. The second day they were in New Orleans, VT began posting commercial sex advertisements. KW did not want to do commercial sex dates and did not receive any of the money KW earned from engaging in sex acts with clients. KW stated that FLY

arrived later and had KW walk the streets and go to bars to talk to men. KW returned to Milwaukee, WI, and moved in with VT and FLY at 735 W. Wisconsin Avenue, Milwaukee, WI.

KW was under FLY's control for three years beginning when she was 18 years old. KW did dates, worked the phones, and worked at OTB. At OTB, KW made approximately \$2600 - \$3000 per day. KW stated she did a lot of commercial sex acts at OTB. KW stated the sex acts occurred at the VIP lounge. Some of the VIP lounges had doors, but others were slots with strings of beads in the door opening. KW explained that the bouncers that worked in the VIP section would turn down the lights when a commercial sex act occurred in the VIP lounge and would know that a sex act occurred.

KW stated that FLY physically beat her, strangled her, and dragged her while at the 735 address. KW witnessed FLY punch VT in the face, chest, strangle VT, and stomp VT on multiple occasions. FLY took KW's ID and social security card so that she could not run off. FLY tried to use KW's information to obtain a PPP loan, but it did not go through. KW knows that FLY used VT's information to get a PPP loan. KW knows RULE and RUSS, and knows that they all prostitute women.

KW was required to give all of her money to FLY and had to ask FLY for food, drink, clothes, and toiletries, etc. KW had rules to follow such as: KW was not allowed to talk to or have any male friends (unless KW could make money off the male), KW was not allowed to look at FLY's friends, KW had to keep her head down, KW had to make \$1000 - \$1500 per day, and KW was not allowed to smoke, drink, or vape. If KW broke any of the rules, then FLY would physically beat her, have her walk outside on the street for hours engaging in sex acts, or she had to work, engage in sex acts, out of a hotel room and make a certain amount of money within a time frame. KW stated that FLY never had a job or alternate source of income.

FLY made several promises to KW like that he was going to provide her with a house and Mercedes Benz if she made \$50,000 by the time she turned 20 years old. FLY would tell KW "if you do good today you can get this or that." VT is the one who made advertisements for KW. KW did both incalls, out of Airbnb's, and outcalls. FLY and VT set the prices for the dates KW went on. KW could not say no to dates because she lived with VT and if KW did not do a date, then VT would tell FLY. FLY would track KW and VT using Life360 so he would always know their location.

KW was scared to inform law enforcement because FLY is well known in Miami, Florida and everyone loves him, and everyone at OTB knows FLY.

#### **CHARGES RELATED TO DANTAVIA RULE (DOB: 03/17/1994)**

On September 25, 2023, Officer Krakau was sitting stationary in the 10600 block of South 27th Street, Franklin, Wisconsin when he observed a black Audi A7 traveling northbound not displaying a front license plate. A traffic stop was conducted and the driver and sole occupant of the vehicle was RULE. Officer Krakau detected an odor of fresh marijuana emanating from the vehicle so a search of the vehicle was conducted. 20 grams of marijuana was located underneath the driver seat along with an apartment rental agreement for MD (mentioned below). The contract indicated that RULE had paid an online rental fee of \$260 on September 22, 2023. Additionally, a money order receipt for \$803 from MD made on September 22, 2023 was located. Officer Krakau also recovered two phones from the vehicle.

Sergeant Goers obtained a search warrant for RULE's phone. Upon searching the phone, Sergeant Goers observed the following message in the "Notes" application of the phone titled as "business:" "Hi Guys are you looking for a movie magical Fantasy Fun time with the girl of your dreams look any longer contact now 2627588459 donations are for time and companionship only. Anything else that may occur is between two consenting adults. By contacting you agree that you are Not Affiliated With Any Form of Law Enforcement!!!" This note was created on March 11, 2021. The language in this message was used in a commercial sex advertisement for MR (mentioned below) that was the basis for an undercover operation on July 20, 2023. This language was saved in the Notes section of the phone with a modified date of July 20, 2023.

Also in the Note section was the following, which was created on January 05, 2022:

Nationwide

MY purpose

-give you game (guidance attention motivation & education)

-change your image, your vocabulary n your prospective

-address your flaws and improve them

-turn you into a desired women that attracts any man of any caliber.

-upgrade your living and your expectations

-break you down and build you strong enough so no one can ever break you again.

-solve all you're problems and make things 10 times better

\*RESPECT

-Respect carries you along way always be respectful and keep it player (respect not just me but others at all times)

-Address me as daddy rule or sir (I'm not your bro dude homie fam boo bae etc..I'm your king n expect the most high respect)

-in public walk behind me or beside me (never in front of me)

-no talking out of turn... over talking loud talking... talking back.. Hostile talking with attitude etc

-when Conversations I want your undivided attention ( not in your phone nor bad body Language)

-(white girls)nigger is off limits

\*self care

- monthly check ups

- Hygiene is a must (nice breath n body odor)

- Always keep yourself up (got to be as pretty as me you're a reflection of me) - No cigarettes, black n miles, pills, coke etc no hard drugs (liquor weed vape pins accepted)

- Keep environment clean (house car etc)(Clean environment is good for the mind We are family we look after each other and protect each other what one person does affects the whole team we move as one... what goes on in this family is strictly between this family.

Based on Sergeant Mark Goers' training and experience, the above note appears to set forth RULE's recruitment "pitch" and his expectations for the women performing commercial sex acts for him. The

term “daddy” is a term of respect that many traffickers require their victims to use for them. The term “family” is used euphemistically to refer collectively to the trafficker and all of his victims. The rule that girls are to walk behind RULE is commonly enforced by sex traffickers against their victims. It is usual for traffickers to promise their victims that they will solve all of the victim’s problems and make the victim’s life ten times better, which is a common recruitment tactic among traffickers.

**COUNT 5: TP VICTIM OF HUMAN TRAFFICKING (940.302(2)(j)). 05/24/2019 - OCTOBER 2022.**

TP (DOB: 05/24/2001) reported to law enforcement that she met RULE while dancing at OTB when TP was 18 years old. At first, RULE would not spend money on dances, but would talk to TP. RULE told TP that he would help her out financially and would give her nice gifts. They exchanged phone numbers and approximately five months later TP moved in with RULE located in Milwaukee, Wisconsin.

RULE told TP that she had to make him money for her to stay with him. RULE told TP that TP had to make at least \$1200 - \$1500 per day. TP stated that Rule would say to her “you can’t make good money just dancing on guys and [she] needed to do more,” which TP took as an implication that she needed to conduct commercial sex acts. RULE would check on TP throughout the evening and if TP was not making enough money, then RULE would set up dates for TP so she could make the money for the daily quota.

RULE lined up the dates for TP to go on. RULE looked through TP’s phone and found photos he would use to advertise for these dates. At first, the dates did not involve conducting sex acts with clients, but then she was offered \$2,500 to conduct sex acts. RULE set the prices for the dates and wanted TP to conduct sex acts. RULE posted the advertisements for TP to commit commercial sex acts. TP never saw the advertisements and never communicated with the clients prior to the date. RULE would tell TP she had a date and she would go. TP had little to no information before going on the dates. RULE controlled all aspects of the transactions and dates.

Most of the commercial sex acts TP performed occurred inside of OTB. TP would usually perform mouth to penis sexual intercourse or penis to vagina sexual intercourse inside the “champagne room” at OTB. At OTB, TP would find a customer for the champagne room. She would then talk to the customer and make an agreement on a sex service for an agreed upon amount of money. Once they agreed on a sex act and payment amount, TP would tip the bouncer by the cameras so the bouncer would turn the lights off inside the champagne room. The tip would usually be \$50. TP would usually charge customers around \$500 for mouth to penis oral sexual intercourse and around \$3,000 for penis to vagina sexual intercourse. Once the commercial sex act was completed, TP would go back to the same bouncer and tip the bouncer again around \$100. The OTB employee would not necessarily know which sexual act occurred, but was aware that a sexual act happened since the lights were off.

On some nights, either a bouncer or another OTB employee would tell TP that a certain customer wanted a commercial sex act from TP inside the champagne room. After the completion of the act, TP would have to find the employee that set up the date and tip them as a referral tip. TP stated RULE, FLY, and RUSS were pimps and management at OTB knew this. Management allowed these subjects to enter

OTB, sit in the back of the club, talk to dancers, and spend little to no money at the club. TP further stated management knows who the pimps are, what girls have pimps, and what girls are also commercial sex workers. Management knew RULE was TP's pimp, and TP knew if she would have gotten fired from OTB, then RULE would have to pay \$3000 to OTB to get her job back.

TP estimates that she made over \$30,000 off of one of her regular customers and believes she handed over \$100,000 to RULE with money exclusively made from commercial sex acts. TP gave most of the money she earned to RULE, but put some money aside that RULE did not know about. TP was required to give RULE the money she made from commercial sex acts. TP was not allowed to keep money for basic necessities like food. The only time RULE would give TP money would be to get her hair done. TP believed the idea that RULE sold her, which was that they were a team and RULE was going to take care of her. RULE told TP that she needed to pay him for the "information" he provided to TP. Based on complainant's experience and training, sex traffickers frequently impress upon their victims that their "game" or their knowledge about how to make money from prostitution, is valuable, and that their victims owe them a debt because of their willingness to "train" their victims. TP believes she was RULE's first girl and was learning how to be a pimp from FLY.

TP was good friends with MD and also knows that MD was working under RULE.

**COUNT 6: MD VICTIM OF HUMAN TRAFFICKING (940.302(2)(a)). JANUARY 2022 - APRIL 2025.**

In January 2023, a citizen submitted an online tip to the FBI National Threat Operations Centers stating that her 22-year-old daughter, MD (DOB: 12/25/2000) was being abused and trafficked by RULE. MD's mother had met RULE several times in person and believed RULE was dating MD. MD's mother observed visible bruises all over MD's body and was told by MD that RULE was forcing MD to work at OTB. MD's mother has observed RULE to carry a Glock handgun and carry it in his pocket.

Law enforcement was able to run the phone number for MD and found a sex advertisement from March 10, 2023 posted on AdultSearch.com. The photos in the advertisement were of MD, and the post language was the same language located in RULE's cellphone.

On February 14, 2024, RULE was arrested for physically assaulting MD in Brown Deer, Wisconsin. MD reported to law enforcement approximately meeting RULE in 2022 while she was dancing at OTB. RULE told MD that he could improve her credit score and "take her to the next level" financially. MD told RULE that she had a goal of opening a clothing store. RULE told MD that in order to make that a reality, she needed to earn money.

MD quickly fell in line with RULE's directives because she did not want to anger or upset RULE, and thought if she followed his rules, then he would help her financially. MD was required to give RULE all of the money she made. RULE told MD that he was using the money she gave him to build her credit score and buy her a vehicle. MD said her credit never improved and RULE never bought her a vehicle.



If MD was not committing commercial sex acts at OTB, then RULE would have MD go to bars or walk the streets downtown Milwaukee, Wisconsin, “to meet nice guys.” MD explained that “nice guys” were old white men that had a lot of money. She stated that RULE would never let her “fuck around” with black men. RULE taught MD how to talk to men and get money out of them. RULE also taught MD to evaluate the value of men’s watches in order to determine whether they had a lot of money.

RULE would assault MD physically almost every month. At first, RULE would use his fist to punch her in the face. When MD would fall to the ground from the punch, RULE would stomp on her. Over time, RULE learned that MD bruised easily and stopped punching her because people were asking too many questions about her injuries. Instead, RULE began to strangle MD whenever he felt she was acting out of line or disrespecting him. RULE’s physical assaults were precipitated by RULE feeling that MD was not submitting to him or was disrespecting him. RULE would assault MD in front of other women he “managed,” especially newer girls so that they would see the consequences of disrespecting him.

MD was strangled so often and so hard that she was starting to lose consciousness when RULE would choke her. RULE would typically place both hands around her throat until she would pass out. MD could not breathe when RULE was doing this, and MD thought that RULE was going to kill her.

MD stated that the term “pimp” would be an accurate description for RULE. MD is in debt to RULE because “he taught her knowledge.” MD estimates that she made over \$100,000 for RULE in a two year time period and she currently only had \$100 in her name. MD would have to ask RULE for money to buy clothes, food, shoes, and get her nails done. MD left RULE in April 2025.

#### **COUNTS 7 & 8: MD VICTIM OF MISDEMEANOR BATTERY, DISORDERLY CONDUCT, DOMESTIC VIOLENCE**

On May 26, 2023, Milwaukee Police Officers were dispatched to 700 E Kilbourn Avenue, Milwaukee, Wisconsin in regards to a subject with gun call. Upon arrival, law enforcement met with MD who appeared emotional and intoxicated. MD said she has been dating RULE for approximately one year and has been living with him for the past year at the above listed location. They are intimate live-ins. MD had a friend over at the apartment longer than what RULE wanted which caused an argument. RULE told MD that she needed to leave the apartment and put MD’s suitcase outside the apartment door in the hallway. RULE tried to force MD to leave. MD curled up on the ground and RULE began striking MD with a closed fist and started to kick her. MD was struck all over her body, including her head, face, side, arms, and legs. MD got out of the apartment and called police. Law enforcement observed minor contusions on MD’s nose, right elbow, right forearm, and left hip. MD was also complaining of pain to her left side ribs. MD did not consent to RULE’s actions and they caused her pain.

#### **COUNTS 9, 10, & 11: MD VICTIM OF FALSE IMPRISONMENT, MISDEMEANOR BATTERY, DISORDERLY CONDUCT, DOMESTIC VIOLENCE**

On Wednesday February 14th, 2024 Brown Deer Police Officers were dispatched to 8600 North Deerwood Drive in the Village of Brown Deer for a battery complaint. Upon arrival, the officers spoke

with MD in the apartment office. MD stated that her intimate live-in boyfriend, RULE, got into an argument. MD stated she was going to pick up his belongings the previous day and sent him a text message. MD stated she placed his belongings outside in a shopping cart but moved them back inside the above building. MD stated that on the 14th, the defendant texted her to retrieve the items. MD stated she walked into the apartment building and was startled when the defendant was near the elevator. Both MD and the defendant entered the elevator.

The defendant took MD's phone from her hand. MD observed the defendant put his hands into his pockets which MD explained meant the defendant was going to get physically aggressive with her. MD began to physically kick at the elevator button panel in an attempt to summon help. MD and the defendant physically struggled with each other until they reached the garage. The defendant dragged MD by her hair and punched her in the mouth. MD screamed. The defendant stated "stop screaming or I'll punch your teeth out of your mouth." MD then pointed out the defendant to the officers.

The officers observed the defendant and placed him under arrest. The defendant stated he was carrying a firearm. The officers recovered a Sig Sauer P365 from the defendant's waist band. MD told officers that the defendant was armed prior to his arrest.

The officers then continued their interview of MD. MD elaborated that while in the elevator, the defendant hit the button to close the door. MD asked the defendant to let her out of the elevator so that MD could give the defendant his belongings back. MD described that she was being pinned in the corner of the elevator as she began to kick the buttons of the elevator panel. MD stated that as she was kicking the panel, the defendant punched her in the leg with his closed right fist. MD and the defendant ultimately exited the elevator and walked towards the storage unit. MD stated the defendant grabbed MD by the hair and pulled her to the floor. Once on the floor, the defendant began to beat her. MD described being kicked by the defendant and punched while curled up into a ball on the floor. MD was screaming as loud as she could. MD stated that the defendant's actions caused her pain and she did not consent to being struck by the defendant.

MD stated she was able to run away from the defendant through the main lobby. MD ran into the apartment office where the police were called. During this incident, particularly in the elevator and the garage parking lot, the defendant prevented MD from leaving, without MD's consent, and without the lawful authority to confine MD. The defendant knew he did not have lawful authority to confine MD in the parking garage or the elevator.

## **COUNT 12: MD VICTIM OF STRANGULATION, DOMESTIC VIOLENCE**

In a subsequent interview, MD told officers that on February 12, 2024, at 8600 North Deerwood Drive in the Village of Brown Deer, Milwaukee County, RULE strangled her in the garage area near the garbage collection area. MD elaborated that RULE pinned her against the wall, placed his hand against her throat, and applied pressure. MD stated she would black out, have to catch her breath, and she could not breathe. MD stated that RULE picked her up and put her against the wall and recalled her feet leaving the ground as RULE placed his forearm against MD's throat and applied pressure. MD stated her breathing was impeded and she blacked out. MD did not consent to RULE applying pressure to her throat.

**COUNT 13: MD VICTIM OF FELONY INTIMIDATION OF A VICTIM, DOMESTIC VIOLENCE**

Following his arrest on February 14th, 2024, RULE was conveyed to the Milwaukee County Jail located at 949 North 9th Street, in the City of Milwaukee, Milwaukee County, Wisconsin. RULE was served with a 72-hour no contact order following his arrest for the above incident. RULE used his inmate ID # to place phone calls to MD.

In the first call, on February 15th, 2024 at 8:49AM, RULE calls MD and states, “do on up there and drop them charges, man, so I can get out of her” and “You the only one that can go up there and drop the charges.” RULE states that “I just snatched the phone...pulled you by your damn jacket.” RULE then states, “You going to drop charges or not?” MD responds that she did not know where to go and RULE told MD to “Go to the Brown Deer Police Station. Then when you leave there to Milwaukee County where I’m at downtown. Don’t even tell them I had contacted you because they told me not to contact you. In a subsequent call, placed on February 15th, 2024, at 9:49AM, MD tells RULE that she talked to the DA’s Office wanting to drop the charges but that they do not have the report yet. The call is immediately cut off.

Brown Deer Police Detective Brian Gunette listened to these calls and, based on his training and experience, believes the calls were a knowing attempt to dissuade MD, having been a victim of the above crimes of domestic violence, from causing a complaint, indictment or information to be sought and prosecuted.

**COUNT 14: MR VICTIM OF RECEIVING COMPENSATION. JANUARY 2023 - JULY 2023**

On July 20, 2023, law enforcement conducted an interview of MR (DOB:07/25/2002) who was encountered during a targeted human trafficking victim recovery operation. An undercover officer responded to an online commercial sex advertisement for MR, and a date was negotiated. The undercover provided an Uber which picked up MR from 700 East Kilbourn Avenue, Milwaukee, Wisconsin, a residence associated with RULE, and brought her to a hotel in Oak Creek, Wisconsin.

MR was in possession of two cellphones. While law enforcement was documenting the cellphones, a call appeared with the display name “Zeus.” MR was shown the sex advertisement that law enforcement responded to and MR stated she had not seen the advertisement because “Zeus” makes all of her advertisements.

MR stated that “Zeus” told MR to leave her phone on at all times, and that if a prospective date responded to one of her advertisements, she should let “Zeus” know right away and he would coach her via text message what to say. Law enforcement observed these “coaching” text messages between MR and “Zeus.”

MR met “Zeus” on Instagram several months earlier. “Zeus” had a ‘P’ emoji on his Instagram account, which MR knew from her experience and knowledge meant that he was a pimp. “Zeus” told MR he would help her and take care of her financially. “Zeus” offered to throw MR a 21st birthday bash

if she worked for him as one of his “girls” performing commercial sex acts. “Zeus” also agreed to take over her vehicle payments and said he would buy her food and clothing as long as she worked for him.

“Zeus” purchased MR a phone and installed an application on the phone called Life360 so that “Zeus” could always track MR’s location. “Zeus” provided MR with condoms and said she is not allowed to do sex dates without a condom. “Zeus” told MR that if she needs anything including basic needs or any extra things that she is to call him, and he will get it for her. MR stated that there were times she told “Zeus” she was hungry and he brought her food.

“Zeus” and MR have had sexual intercourse multiple times and he has asked MR to get on birth control. “Zeus” told MR that he pimps multiple girls and makes a lot of money doing it. MR stated the Uber picked her up from “Zeus” apartment on the 7th floor of 700 E. Kilbourn and that she was supposed to give him the money she made from the sex date. “Zeus” carries a firearm on his person from time to time.

MR was shown a photo of RULE and asked if the individual depicted “Zeus.” MR cried and confirmed that RULE is her pimp. RULE told MR if she came into contact with police, then MR needs to keep her mouth shut because RULE could be facing prison time.

**CHARGES RELATED TO MAURICE RUSSELL “RUSS” (DOB: 03/12/1994) COUNT**  
**15: ML VICTIM OF RECEIVING COMPENSATION. JANUARY 2020 - JANUARY 2022.**

ML (DOB: 02/10/2000) reported to law enforcement first meeting Austin Pruitt “AP” Durant (DOB: 01/05/1998) on Tinder, an online dating site. AP is the younger brother of FLY. ML recalls AP listing his occupation as an accountant on his Tinder biography. ML did not pursue a relationship with AP. AP introduced ML to RUSS in 2020. ML began dating RUSS and told him that she was struggling financially. RUSS told ML that he would take care of it for her. ML recalls RUSS wearing a chain and looking like he had money.

ML moved into RUSS’s apartment at The Buckler located at 401 W. Michigan Street, Milwaukee, Wisconsin. ML stated that RUSS talked to her in a persuasive manner and kept telling her that he would take care of her as long as they were a team. RUSS took ML to strip clubs and had her audition to get a job there. ML got hired at The Airport Lounge located at 5881 S. Howell Avenue, Milwaukee, Wisconsin. ML was paid in cash and was required to give all of the money she earned to RUSS. Whenever ML made money, RUSS would tell her it is “our money” and not hers. RUSS also wanted ML to get a sugar daddy and be a model for his website.

RUSS had ML do commercial sex dates in addition to dancing at strip clubs. ML did not want to do sex dates. RUSS would give ML advice on how to make money by approaching the right type of people at bars and at clubs. RUSS told ML to look at how men dressed and notice the type of watches they were wearing.

RUSS set up dates for ML and ML did not have a choice on the type of dates or if she wanted to go on these dates. ML did both incall and outcall dates for RUSS. In the beginning, RUSS would set up

ML's dates online on a website and then he taught her how to do it herself. RUSS set the prices between \$300 and \$500. ML got paid in cash or via CashApp and would give RUSS all of the money she made. ML stated if she needed anything, including basic needs and also getting her nails done, she would have to ask RUSS for it.

RUSS told ML that customers have to wear a condom when doing dates and ML is not allowed to talk to any other guys. Additionally, RUSS was tracking ML's location via either "Find my iPhone" or "Life360." RUSS would Uber ML to her outcall dates. RUSS expected ML to get up at 7AM and find dates by talking to people at the bar, then work at the strip club from 6 PM till 2AM. Sometimes RUSS would have dates lined up after ML returned from work and she would have to go on those dates. Some of which were with AF (DOB: 04/01/2001). ML felt pressured by RUSS to make money.

RUSS would tell ML that she had an attitude problem and would tell ML to pay a fee for getting into trouble with RUSS. RUSS was always yelling at ML and telling ML to fix her mood, and then would request ML to pay a certain amount for being disrespectful to RUSS. Sometimes RUSS would kick ML out as punishment.

RUSS had ML's social security number and used it to open a credit card in ML's name. RUSS would use this credit card to pay for the things ML needed. ML stated she had to pay off the credit card and that RUSS did not make payments on it. After a while ML started to set money aside because RUSS would not give ML money for things ML needed.

ML had to ask RUSS for permission to hang out with ML's friends. RUSS would say "time is money," so if ML wanted to hang out with friends, then ML had to talk to them about joining the team. RUSS did not allow ML to see family during holidays and told ML to stop speaking to family. ML became completely isolated.

After approximately eleven months together, RUSS told ML that she was in trouble and had to make RUSS \$10,000. Instead, ML left RUSS. After leaving, RUSS continuously texted and called ML telling her to come back.

RUSS did not have employment. ML knows RUSS would tell people he was a barber but he in fact was not. If ML did not do a sex date, then RUSS would yell at ML and ML had nowhere to go. ML also stated that RUSS had ML's social security number and personal information and was verbally abusive towards her.

ML never filed for a business loan; however there are business loan documents in ML's name for the business "myanauh." ML stated that "myanauh" is not a real company and the address on the loan application is the one that ML was residing at with RUSS and AF. The email used on the loan application was used on websites when RUSS would post commercial sex advertisements of ML.

#### **COUNT 16: AF VICTIM OF RECEIVING COMPENSATION. FEBRUARY 2021 - PRESENT.**

When ML met RUSS, he was involved with AF. ML described RUSS's and AF's relationship as somewhat dating but more so people who are making money together. AF had regular customers and

sometimes AF would bring ML on her dates with regular customers. AF convinced ML to start doing sex dates approximately one month after going to strip clubs to work. ML and AF have done “two-girl specials” where they have both engaged in a commercial sex act and the customer pays AF afterwards who then forwards the money to RUSS.

In February of 2021 ML traveled to Miami, FL with AF and RUSS where they stayed for three to four months in a condominium. ML worked at a Gentlemen’s Club in Miami with VT. ML knows that what ML was doing for RUSS, VT was doing for FLY.

ML also traveled with AF to Chicago, IL and New Orleans, LA. ML and AF would fly and RUSS would drive because he was on probation or parole. AF told ML that AF had the option of talking her way out of doing commercial sex and instead built conversations with the dates.

AF also conducted a “two-girl special” with KW at the Potawatomi Hotel and Casino in Milwaukee, Wisconsin. After completing the sex date, KW and AF were paid, they sent the money to FLY and/or RUSS.

### **CHARGES RELATED TO BRIAN HOPKINS (DOB: 3/3/1975) COUNT**

#### **17: KEEPING PLACE OF PROSTITUTION**

Complainant knows Brian Hopkins is one of the head managers of OTB. Neither HOPKINS nor OTB prevented or stopped the commercial sex acts from occurring within the business. OTB only required that employees, like bouncers, bartenders, and DJ, get a tip once the sex acts were complete from the female that performed the sex act.

On or around November 16, 2022, a source described OTB as a “whore house” with owner Danny Hay and manager Brian HOPKINS. The witness stated customers can get any sex act they want inside OTB. Additionally, the witness reported the females that have traffickers, usually see the traffickers in the club later in the evening and closer to closing time.

On or around February 27, 2020, a former worker at OTB stated that sex trafficking takes place inside the club and OTB management is aware of it and benefit from it by receiving a tip out from the females for the sex dates. These sex dates take place in the private dance rooms, so it appears the customers are receiving a private dance, but instead the customers are paying for sexual acts. The witness explained that either the dancer or the customer will tip the DJs and bouncers money, they will turn down the lights in the VIP rooms, so a sex act can take place and not be visible on the security cameras.

Complainant is aware that OTB is publicly known for allowing sex acts to occur inside their club. Complainant has observed OTB discussed on USA SexGuides, an online forum, where individuals post statements alluring to the availability of sex acts inside the club from dancers.

- 12/13/2023: “... I’ve taken her to the VIP several times and never had an issue getting pretty much whatever I wanted. She can be a bit mechanical so that’s why I haven’t done a room with her for a bit”

- 02/12/2024: "...I've always had fun with Ricky and Bebe. Ricky may not be the hottest girl, but she's extremely willing to please. Same with Bebe. She can be somewhat mechanical, but if you talk to her for a bit beforehand and get her to loosen up she's a lot of fun."
- 02/24/2024: "The issue with not offering extras is that it varies from person to person. I've heard from some people that some girls don't offer extras, but I've been offered them. Same in reverse, I haven't been offered extras where others have."
- 08/27/2024: "With the passing of Danny last month, I recently heard from some of the girls that some changes have been instituted over the past few days at On The Border. Apparently tipping security no longer ensures that the lights can be turned off in the VIP rooms anymore."
- 10/12/2024: "30 VIP room is 315 (plus tip) but you can have extras for sure. FS or CFS I do not know and have not done. But it wouldn't shock me. Most is BBBJ for me."

In October 2022, Franklin PD received an anonymous handwritten letter. The letter explained how the writer, an anonymous male, stopped at OTB several months ago and paid for a lap dance. During the course of the lap dance, the female dancer performed a sexual act on the anonymous male. The anonymous male stated in the letter that the club, OTB, seemed to openly allow prostitution to take place inside the business location.

On March 27, 2023, a trash pull was conducted from three dumpsters from OTB. During the trash pull, 14 condom wrappers and three used condoms were found.

HOPKINS knowledge of these pimps is evident with HOPKINS being mentioned in the following Instagram conversation obtained from DURANT's Instagram account:

Conversation with account handle bhiebecchbcbejca and Flyvio on July 14, 2021 at 8:32 AM. •

Flyvio: U never talked to yo boy for me either ...Carlos about mocha

- b: I actually talked to everyone about her coming back. Tammy wants her back because she loves moca . Carlos has no say in it . Moca needs to talk to brain about her job back he might make her pay a tip to come back which is ridiculous.
- bn: Brain just watch me fight a bitch in his face so he not talking to me right now
- Flyvio: Nigga not answering the phone n Carlos not letting her back to there talk to him plus she been gone from that job dam near a while year
- b: I'm finna go back n talk to Carlos maybe if we give him money instead of Brian

It was well known amongst employees that danced at OTB that if HOPKINS fired them from working inside OTB, then they could pay HOPKINS to get their job back. The amount any of the abovelisted girls had to pay would vary based on the reason they were fired in the first place. An employee witness stated that the money would have to be at least several thousand dollars to get their jobs back. TP was informed by HOPKINS if she was fired from OTB, then she would owe him \$3000.

KW was fired from OTB by HOPKINS for not tipping well enough. FLY spoke to HOPKINS about KW getting her job back. FLY then gave KW \$2500 in cash that KW gave to HOPKINS. KW then got her job back at OTB. KW believes this occurred in January or February of 2022. KW is also aware

of HOPKINS firing VT. In order to get VT her job back at OTB, FLY paid HOPKINS \$6000\$7000, and then VT was hired back at OTB. Former OTB employee M.M provided statements to investigators stating that he was aware that K.W had to pay to get her job back at OTB. In addition to his knowledge of KW, M.M stated that another dancer at OTB openly bragged about getting fired from OTB and “dropping money” in HOPKINS “lap” to get her job back. This dancer was identified as V.D, DOB: 4/18/86. M.M recalled seeing HOPKINS, DURANT and VD all go into the manager’s office with each other believed to be in August of 2022. After the meeting between HOPKINS, DURANT and VD, one of DURANT’s girls “Mocha” (known to law enforcement as VT) got her job back at OTB. M.M heard that VT had to pay approximately \$4500 to HOPKINS to get her job back at OTB.

Complainant is also aware of OTB being notorious for pimps to recruit girls from OTB and these girls continue to work at OTB while under the direction of a pimp.

Based on the above statements and complainant’s examination of reviews of OTB left by customers, complainant knows that OTB is a place where persons habitually engage in nonmarital sex acts. Complainant also knows based on his knowledge and involvement in this investigation that HOPKINS exercises management or control over OTB.

\*\*\*\*End of Complaint\*\*\*\*

**Electronic Filing Notice:**

This case was electronically filed with the Milwaukee County Clerk of Circuit Court office. The electronic filing system is designed to allow for fast, reliable exchange of documents in court cases. Parties who register as electronic parties can file, receive and view documents online through the court electronic filing website. A document filed electronically has the same legal effect as a document filed by traditional means. You may also register as an electronic party by following the instructions found at <http://efiling.wicourts.gov/> and may withdraw as an electronic party at any time. There is a \$ 20.00 fee to register as an electronic party. If you are not represented by an attorney and would like to register an electronic party, you will need to contact the Clerk of Circuit Court office at 414-278-4120. Unless you register as an electronic party, you will be served with traditional paper documents by other parties and by the court. You must file and serve traditional paper documents.

Criminal Complaint prepared by Katrina Voge.  
ADA Assigned Email Address: [katrina.voge@da.wi.gov](mailto:katrina.voge@da.wi.gov)

Subscribed and sworn to before me on 12/10/25Electronically Signed By:  
Electronically Signed By: PO Christopher Krakau  
Katrina Voge Complainant  
Assistant District Attorney  
State Bar #: 1119489