

STATE OF WISCONSIN

Plaintiff,

-vs-

LINDY N GILL
 821 Fairmont Ave
 Madison, WI 53714
 DOB: 12/10/1974
 Sex/Race: M/B
 Eye Color: Brown
 Hair Color: Black
 Height: 5 ft 10 in
 Weight: 188 lbs
 Alias: Also Known As Ramaro Nelson
 Johnson
 Also Known As Gill Nelson Gill
 Also Known As Edward D Harrison
 Also Known As Thomas Thomas
 Also Known As Ramaro Johnson
 Also Known As Junior T Thomas
 Also Known As Lindsey Thomas
 Also Known As Junior Thomas
 Also Known As Eddie Harrison

Ref. Agency: Madison (City) Police
 Department
 DA Case No.: 2014DA008163
 Assigned DA/ADA:
 Agency Case No.: 2014-00191975
 Court Case No.:
 ATN: 13011408300293

Defendant,

**COMPLAINING WITNESS
COURT OFFICER**

The above-named complaining witness being first duly sworn states the following:

Count 1: SECOND DEGREE SEXUAL ASSAULT, REPEATER (Victim 1)

The above-named defendant on or about June 18 through June 19, 2014, in the City of Madison, Dane County, Wisconsin, by use of force , did have sexual intercourse, with Victim 1, without the consent of that person, contrary to sec. 940.225(2)(a), 939.50(3)(c), 939.62(1)(c) Wis. Stats., a Class C Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than forty (40) years, or both.

And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of Possession of Cocaine (2nd +), contrary to Wis. Stat. 961.41(3g)(c), a class I felony, on January 19, 2010 in Dane County Case Number 2010CF107 during the five year period immediately preceding the commission of this offense, which conviction(s) remain of record and unreversed, wherefore, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

Count 2: ATTEMPT HUMAN TRAFFICKING, REPEATER (Victim 1)

The above-named defendant on or about June 12 through June 19, 2014, in the City of Madison, Dane County, Wisconsin, did knowingly attempt to engage in trafficking for the purposes of commercial sex acts by controlling or threatening to control Victim 1's access to an addictive controlled substance, contrary to sec. 940.302(2)(a), 939.50(3)(d), 939.32, 939.62(1)(c) Wis. Stats., an attempt to commit a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of Possession of Cocaine (2nd +), contrary to Wis. Stat. 961.41(3g)(c), a class I felony, on January 19, 2010 in Dane County Case Number 2010CF107 during the five year period immediately preceding the commission of this offense, which conviction(s) remain of record and unreversed, wherefore, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

Count 3: HUMAN TRAFFICKING, REPEATER (Victim 2)

The above-named defendant on or about April 25, 2014 through August 28, 2014, in the City of Madison, Dane County, Wisconsin, did knowingly engage in trafficking for the purposes of commercial sex acts by controlling or threatening to control Victim 2's access to an addictive controlled substance, contrary to sec. 940.302(2)(a), 939.50(3)(d), 939.62(1)(c) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of Possession of Cocaine (2nd +), contrary to Wis. Stat. 961.41(3g)(c), a class I felony, on January 19, 2010 in Dane County Case Number 2010CF107 during the five year period immediately preceding the commission of this offense, which conviction(s) remain of record and unreversed, wherefore, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

Count 4: RECEIVING COMPENSATION FROM THE EARNINGS OF A COMMERCIAL SEX ACT, REPEATER (Victim 2)

The above-named defendant on or about April 25, 2014 through August 28, 2014, in the City of Madison, Dane County, Wisconsin, knowingly received compensation from the earnings of a commercial sex act as described in 940.302(1)(a)1. and 2. Wis. Stats., contrary to sec. 940.302(2)(c), 939.50(3)(f), 939.62(1)(c) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve years and six months (12.5), or both.

And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of Possession of Cocaine (2nd +), contrary to Wis. Stat. 961.41(3g)(c), a class I felony, on January 19, 2010 in Dane County Case Number 2010CF107 during the five year period immediately preceding the commission of this offense, which conviction(s) remain of record and unreversed, wherefore, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

Count 5: HUMAN TRAFFICKING, REPEATER (Victim 3)

The above-named defendant on or about April 25, 2014 through July 31, 2014, in the City of Madison, Dane County, Wisconsin, did knowingly engage in trafficking for the purposes of commercial sex acts by controlling or threatening to control Victim 3's access to an addictive controlled substance, contrary to sec. 940.302(2)(a), 939.50(3)(d), 939.62(1)(c) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of Possession of Cocaine (2nd +), contrary to Wis. Stat. 961.41(3g)(c), a class I felony, on January 19, 2010 in Dane County Case Number 2010CF107 during the five year period immediately preceding the commission of this offense, which conviction(s) remain of record and unreversed, wherefore, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

Count 6: RECEIVING COMPENSATION FROM THE EARNINGS OF A COMMERCIAL SEX ACT, REPEATER (Victim 3)

The above-named defendant on or about April 25, 2014 through July 31, 2014, in the City of Madison, Dane County, Wisconsin, knowingly received compensation from the earnings of a commercial sex act as described in 940.302(1)(a)1. and 2. Wis. Stats., contrary to sec. 940.302(2)(c), 939.50(3)(f), 939.62(1)(c) Wis. Stats., a Class F Felony,

and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve years and six months (12.5), or both.

And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of Possession of Cocaine (2nd +), contrary to Wis. Stat. 961.41(3g)(c), a class I felony, on January 19, 2010 in Dane County Case Number 2010CF107 during the five year period immediately preceding the commission of this offense, which conviction(s) remain of record and unreversed, wherefore, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

Count 7: HUMAN TRAFFICKING, DOMESTIC ABUSE, REPEATER (Victim 4)

The above-named defendant on or about April 25, 2014 through June 28, 2014, in the City of Madison, Dane County, Wisconsin, did knowingly engage in trafficking for the purposes of commercial sex acts by using any scheme, pattern, or other means to directly or indirectly coerce, threaten, or intimidate Victim 4, contrary to sec. 940.302(2)(a), 939.50(3)(d), 939.62(1)(c) Wis. Stats., a Class D Felony, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than Twenty Five (25) years, or both.

And further, invoking the provisions of sec. 968.075(1)(a) Wis. Stats., because this charge is an act of domestic abuse, costs upon conviction would include the domestic abuse assessment imposed under sec. 973.055(1) Wis. Stats.

And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of Possession of Cocaine (2nd +), contrary to Wis. Stat. 961.41(3g)(c), a class I felony, on January 19, 2010 in Dane County Case Number 2010CF107 during the five year period immediately preceding the commission of this offense, which conviction(s) remain of record and unreversed, wherefore, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

Count 8: RECEIVING COMPENSATION FROM THE EARNINGS OF A COMMERCIAL SEX ACT, REPEATER (Victim 4)

The above-named defendant on or about April 25, 2014 through June 28, 2014, in the City of Madison, Dane County, Wisconsin, knowingly received compensation from the earnings of a commercial sex act as described in 940.302(1)(a)1. and 2. Wis. Stats., contrary to sec. 940.302(2)(c), 939.50(3)(f), 939.62(1)(c) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve years and six months (12.5), or both.

And further, invoking the provisions of sec. 968.075(1)(a) Wis. Stats., because this charge is an act of domestic abuse, costs upon conviction would include the domestic abuse assessment imposed under sec. 973.055(1) Wis. Stats.

And further, invoking the provisions of sec. 939.62(1)(c) Wis. Stats., because the defendant is a repeater, having been convicted of Possession of Cocaine (2nd +), contrary to Wis. Stat. 961.41(3g)(c), a class I felony, on January 19, 2010 in Dane County Case Number 2010CF107 during the five year period immediately preceding the commission of this offense, which conviction(s) remain of record and unreversed, wherefore, the maximum term of imprisonment for the underlying crime may be increased by not more than 2 years if the prior convictions were for misdemeanors and by not more than 6 years if the prior conviction was for a felony.

FACTS:

On Thursday, 06/19/2014, at approximately 6:04 a.m., Officer Baldukas was dispatched to the Howard Johnson Hotel at 3841 East Washington Avenue, Madison WI, Dane County. Officer Baldukas met with Victim 1. Victim 1 stated that she had been sexually assaulted in room #101 at the Howard Johnson during the early morning hours of June 19, 2014. She told Officer Baldukas that he has the nickname of "Elbow" and that he is her pimp. Victim 1 later identified Lindy Gill, 12/10/1974, through a Spillman photo, as the perpetrator of the sexual assault and referred to him as Lindy

Victim 1 stated that during the assault, "he was really rough...I have bruises." Victim 1 stated that the assault occurred on the side of the bed in the hotel room. Victim 1 described the assault as Gill having vaginal intercourse with her. She described carpet burns on her knees and bruising on her buttocks. She stated that it was forced, and "I was like no, we're not doing this."

Officer Baldukas accompanied Victim 1 to Meriter Hospital in order to complete a S.A.N.E exam. Victim 1 explained to the S.A.N.E. nurse that Gill was taking pictures for backpage because he sells women for backpage when he became "touchy" with her.. She told Gill that she did not want to have sex, and he told her "You belong to me!". Gill ordered her to the floor in order to be hidden if someone entered the room. She reported that Gill forced her to have sex on the side of the bed. Victim 1 stated that he did not wear a condom and she was pretty sure that he ejaculated in her vagina. Victim 1 described experiencing pain in her legs because of the way that Gill grabbed her and controlled her. Victim 1 described Gill as "very forceful", explaining that she "knew he was serious and I felt that if I didn't cooperate" that Gill would physically hurt her or batter her.

Victim 1 reported that she met Gill approximately one week before June 19, 2014. and he invited her to become an escort. She explained that she is a heroin addict and that "they're setting me up to be an escort". Gill invited her to be an escort and promised her an extravagant lifestyle. He told her that she would never go without "dope". He promised her that she could make a substantial amount of money as a prostitute.

Victim 1 stated that Gill then took her to McDonald's and told her that the rules were that everything is his and that they need to put all of their property out in the open, that their cigarettes, their drugs, their phones and all their money are his and that his reality is their world and their reality. Gill then told her that they answer to him.

Victim 1 identified twin females (Victim 2 and Victim 3) as working for Gill, as well as Victim 4, the mother of his child. Gill told Victim 1 and the twins that, "I'll feed you all day". They all stayed together at the Red Roof Inn and Victim 1 had been using heroin for the week that she was with them, approximately June 12 through June 18, 2014. Then Gill, Victims 1, 2, 3, and 4 all came to the Howard Johnson on or about June 18. They were all present at the Howard Johnson on June 19, 2014.

Victim 1 stated that during the week at the Red Roof Inn, they were doing drugs and making money and Gill was getting upset with her for not doing jobs. Victim 1 stated that the twins (Victims 2 and 3) and Victim 4 were "doing tricks". Victim 1 stated, at one point, she and Gill drove Victim 3 over to an apartment off of Fish Hatchery and waited for her. When Victim 3 got back in the car, she had to give Gill all her money and that he put it in his pocket. Victim 1 stated that it was known ahead of time that Victim 3 would get \$100 for half an hour and \$200 for an hour and, since she was there for one hour, she assumed that Victim 3 gave Gill \$200.

Victim 1 stated that Gill holds the drugs over them and that he teases them with drugs. Victim 1 stated that Gill would play some game with the twins and say things such as, "You've gotta be my runner," and he would take one hour to give the drugs to them while taunting them with the drugs. Victim 1 stated that they would all have to "suck up to Gill" and that he would just hold the drugs out in front of him and make them beg for the drugs.

Victim 1 stated that Gill initially put postings of her on Craigslist, but had recently created an account for Victim 1 on backpage.

Victim 1 had been given a cell phone to use for prostitution by Gill, with the cell phone number of 259-64##

Officer Baldukas found a wallet in the room that appeared to belong to Gill. There was a MasterCard in the wallet that had the name of Victim 1 on it.

Victim 1 told Detective Rortvedt that it was her MasterCard. Victim 1 said that she had not been making money prostituting, so she gave the MasterCard to Gill the day before, because Gill was "making me feel like crap, because I wasn't making any money."

Victim 1 state that she was concerned about the health of the twins, Victim 2 and Victim 3. Detective Rortvedt observed the twins and saw that they each had sunken eyes and pale skin and appeared to be underweight. At the time Det. Rorvedt viewed the twins, they were sitting in the room with Gill.

Victim 1 reported that every night the twins are falling all over the place because of all the heroin that they are doing. Victim 1 stated that Gill was putting them all on Backpage and telling them that they owe him because of the drugs, cigarettes, hotels, the car and the gas. Victim 1 stated that she felt threatened by Gill because if they didn't do what he wanted that they would all be homeless. Victim 1 stated that she has also seen Victim 4 give Gill all of her money that she has made on tricks. Victim 1 thinks that the twins have worked for Gill for approximately five months.

On June 27th, 2014 Victim 1 told Det. Kraicinovic that Gill told Victim 4 that she was supposed to post Victim 1 on Backpage without any pictures. Victim 1 stated that Gill was telling them that they needed to be on Backpage because they needed more money. Victim 1 stated that Victim 4 gave her an old throwaway phone that didn't take any photos and was essentially a black phone with a small keypad on it so that she could answer the Backpage ads. Victim 1 stated that, when a john would text her that he wanted photos, that she then had to text Gill to send the johns a photo of Victim 1. Victim 1 stated that Victim 4 had written Gill's phone number on a piece of paper for her. Victim 1 thought that she would text Gill something like, "getting calls, send a picture", message to Gill and then add the phone number of the john that wanted the photo. Victim 1 stated that Gill had left her in the hotel room and had also left some heroin for her.

On July 2nd and 3rd, 2014 Detective Maya Krajinovic interviewed Victim 4. Victim 4 stated that she met Gill in November of 2009. Victim 4 stated that she was already an escort at the time and when Gill met her, he gave her an "ultimatum to escort or be with him." Victim 4 stated that Gill already had other girls working for him. Victim 4 stated that Gill would have the women prostitute out of hotels and that she was put on Craigslist.

Victim 4 stated that Gill then told her to escort for him and made statements such as, "If you wanna hang out and be with me, you might as well be a whore and start escorting like the rest of them." Victim 4 stated she knows the twins, Victims 2 and 3, were working with Gill since January or February of 2014. Victim 4 stated that she had just met Victim 1 approximately one week prior to the police contact at Howard Johnson on June 19, 2014. Victim 4 stated that prior to the time when Detective Krajinovic made contact with her in June of 2014, she had again been working with Gill for approximately two to three months.

Victim 4 stated that Gill would direct her to use her phone to place ads on Backpage. Victim 4 stated that she, the twins, and Victim 1 were all put on Backpage. Victim 4 stated that Gill was the one who would come up with the wording in the ads; however, since she was faster at texting or typing, Gill would have Victim 4 type the add. Victim 4 stated that Gill would pay for everything that they did with the money that Victim 4 made at her legitimate job or the money that the women would make prostituting. Victim 4 stated that she had a PLS card under her name and would frequently go to the cash/check store on E. Washington Ave. to take money out. Victim 4 stated that Gill

controlled the account. Victim 4 stated that Gill would go into the cash store with her and that they had gone there approximately 20 to 28 times together in the past few months. Victim 4 stated that all the money that was in that account was from the money that she or the other girls had made with their escorting.

Victim 4 stated that after she took money out of the account, "If I didn't hand the money to him, he'd kick us out." Victim 4 reported, "We need him for protection. If a client rough housed us, we would have a phone and call him. He also held all of the weed and drugs." Victim 4 then told me that she is addicted to marijuana and some pain pills, the twins and Victim 1 were very addicted to heroin. Victim 4 then told me that after they had met up with a trick, they would text Gill right when the trick had come into the room and they would have to use words such as "good," "no go," "bad call," or "busted call." Victim 4 stated Gill would then hang out until they were done with their tricks. Victim 4 stated when the trick left she or the other women would have to hand Gill the money they made right away. I asked Victim 4 what would happen if she did not give Gill the money after she was done with her trick and Victim 4 stated, "He would throw a fit. We always gave him the money." Victim 4 then stated that Gill would threaten them and he would say things to them such as, "We'd be nothing. He'd make sure we'd be nothing. He told me I'd lose my child. He wouldn't give me any drugs. I saw him hold heroin from the twins and they would get really sick." Victim 4 and Gill have a child in common.

Victim 4 stated that Gill would set the prices for the tricks and would say things such as, "You are gonna work for \$100 for a half an hour and \$200 for an hour." Victim 4 stated that Gill told her that he never wanted her to kiss the tricks or give them blowjobs.

Victim 4 then told me that Gill was extremely controlling and he would not let them do anything such as make phone calls. Victim 4 stated that if she did want to make a phone call and talk to a friend, he would tell her that she could go and be with her friend and that he would leave her. Victim 4 also stated that when she got her paycheck from her job, he would take the paycheck. Victim 4 stated Gill took her debit card or he would take her to the ATM and have her take the money out for him.

Victim 4 stated that the twins do a total of approximately six to eight escort calls per day. Victim 4 stated that Gill was currently legally married to Michelle Gill. Victim 4 stated that they do tricks in Michelle's basement because it is a common basement that Michelle shared with the next-door neighbors.

On September 10, 2014. Victim 4 explained to Detective Krajcinovic that she felt as though she did not have a choice but to escort when she was with Gill because, "He told me that if I didn't make money he wouldn't be with me. He would make fun of me. He said my mom would take my daughter from me and I'd never see her again if I didn't make him money."

Victim 4 stated Gill would also threaten her by calling human services on her if she did not continue to make money for him by escorting. Victim 4 stated Gill threatened to call

human services and tell them that she was a bad mom for having her daughter live out of the car with her and that she wasn't taking care of her daughter.

Victim 4 stated Gill would also control if she and her daughter were allowed to eat. Victim 4 stated she would have to beg Gill to give her money to buy her daughter food and Gill would only give her \$2-3 so she could buy apple slices and juice from McDonald's. Victim 4 stated she and her daughter were always hungry and Gill did not care since he told Victim 4 that he needed the money to buy drugs.

Victim 4 stated she was told by Gill to put herself on Backpage as an escort to make money for him. Victim 4 stated "he'd make me post. He'd say you need to post right now. I need some money. He'd be over my shoulder." Victim 4 stated if she or one of the other "girls" left for five minutes to buy cigarettes, not only did they have to ask permission but if they were gone longer than five minutes Gill would accuse them of trying to run off and make money on their own. Victim 4 stated Gill would yell at them and berate them if they were not back in five minutes.

Victim 4 stated she felt threatened and that is why she didn't leave Gill. Victim 4 stated, "He said if I ever left him [my daughter] might as well say goodbye to me. He'd tell me I'd be a worthless piece of shit if I left him and I believed him."

Victim 4 stated with respect to escorting she had to give Gill all of the money that she made. Victim 4 stated the first time she did not give Gill all the money "he caught me. He yelled at me for one to one and a half hours telling me that no one will treat me as good as he was." "I was scared. I didn't know what to do if I did really leave. He was in control of how I'd get money otherwise."

Victim 4 stated Gill would control how she dressed and what she did when they went out in public. Victim 4 stated, "I had to have my face done when we went out. I had to have a skirt on or pants, and a nice top. I had to have my chest covered up. I had to be showered or he'd call me 'scrubby'. He wouldn't allow me to talk to his friends. He would say "if you talk to them, don't think you're gonna come back. Go be with them. If you do you won't be as good."

I asked Victim 4 if she had regular escort clients and Victim 4 stated "No, Gill wouldn't let me, but the twins did." Victim 4 explained that if she saw someone more than once Gill would say that they were having a relationship and would be threatened. Victim 4 stated she made the mistake to telling Gill that the john was "safe" because she dealt with him before and Gill would tell her that she couldn't do that trick and would send one of the twins instead.

Detective Maya Krajcinovic and Special Agent Ben Poller met with Gill on September 3, 2014. Gill informed the detectives that the first time he met Victim 2 was four months ago, and it was a relationship that was based on sex. Gill met Victim 2 when she was with her twin sister Victim 3. Gill admitted that he would trade sex for drugs with Victim

2. Gill stated he would give Victim 2 cocaine in payment for her having sex with him. Gill stated he had "swagger" to be with girls.

Gill stated that the twins, Victims 2 and 3, used a lot of heroin. Every three hours the twins get sick, and that their habit is approximately one gram to one and a half grams per day.

Det. Krajcinovic asked Gill if he helped the twins with their escort business and Gill stated "yeah, I helped I admit it. Plenty of times I was there." Gill stated he went along when they were escorting because he did not want to see the twins get hurt since they are 70 pounds. Gill said some of the places Victim 2 went to were dangerous, so Gill wanted to look out for her. Gill used to tell her that his "money" was better than her money. Meaning Gill did not have to do what Victim 2 did to get his money. Gill said that Victims 2 and 3 used to live out of their car, because they all (Gill referenced them all as "we") had been kicked out of hotels all over Madison. Gill said that when the twins had tricks, he would sometimes wait outside until they were done.

S/A Poller asked Gill if anything had ever happened to the twins during tricks while Gill was around. Gill said not really, but he said if they were physically hurt Gill would be angry. Gill said the girls' text messaged him when they went into a trick, to let him know they were ok. Gill said he used to use other peoples phones to communicate during the tricks. Gill stated, "I did have my hands in this in it." Gill went on to talk about the business, and said that he did "aid and abet" and he had his hands in it because he was "there". Gill said honestly he did not know he would be called a "pimp" and that for some reason, girls want him to help them by "putting them on the bed."

When Victim 4 was doing some tricks, Gill said they benefitted from each other. Gill stated he was never the driver but that he did go along with Victim 4 when she was doing her tricks. Gill said he did this because she is his "baby's mamma, I would see a little benefits, and see if she was ok." Gill then explained the benefits that he would see would be monetary and the money that Victim 4 would make would contribute to "me and her".

Detective Krajcinovic met with Victim 2 on September 9, 2014. When asked if Gill was part of Victim 2's escorting business, she stated, "He did drive me to tricks. He did it for my safety. He didn't let me go alone. He told me that we needed the money and that he would need to be there if something went wrong." I then asked Victim 2 if Gill had ever gone and bought heroin for her and Victim 2 stated, "You are correct. He went to go buy drugs for me."

On September 10, 2014, Victim 3 told Special Agent Poller that Gill looked after them on their "dates", by driving with them to meet their clients, and making sure they were safe. After the date, the money was turned over to Gill and was used to benefit them all as a team.

Victim 3 said that they advertised on Backpage for customers, but most of their business was from repeat customers whom they knew. The amount of money they got from each date depended upon the person and what they agreed upon. Sometimes she would get \$200, sometimes more. All the money went to Gill, and then they used the money to purchase heroin. Victim 3 admitted she was a heroin user.

Victim 3 said all the heroin purchased also went to Gill, who held on to the heroin and gave it to the girls when they needed it. Victim 3 said she had gotten into many arguments with Gill about money or heroin, when Gill refused to give them heroin, or give them money to purchase items. Gill had a bad temper when he was mad. Victim 3 said that Gill also has a silver revolver that she thought may have been in his vehicle. Gill used to keep it in a room at the "Aloha" hotel when they stayed there.

Victim 3 stated that she has done "tricks" in the basement of the residence with Gill's wife home.

Gill would get upset if they didn't have any "dates", because that meant no money coming. Victim 3 said that they did not accept all dates, especially if they thought the date was creepy, or if they thought they may get ripped off or hurt. Sometimes Gill would push them to do a date to get the money, even if they did not want to.

Detective Maya Krajcinovic, is a state certified law enforcement officer currently assigned as Detective with the Madison Police Department. In 1996, your affiant graduated University of Wisconsin – Madison Law School and was a practicing attorney, specializing in criminal law, prior to her career in law enforcement. Detective Maya Krajcinovic has worked full-time as a law enforcement officer for more than seventeen years. Detective Maya Krajcinovic has investigated cases involving human trafficking. Detective Maya Krajcinovic has received formal training in the investigation of human trafficking and has trained law enforcement officers and outside agencies statewide on the investigations of prostitution and human trafficking in violation of Wisconsin Statutes and 940.32, 948.051 and 946.49. She has investigated numerous complaints of human trafficking and has been involved in several criminal human trafficking investigations. Detective Maya Krajcinovic has also received training in human trafficking and has reviewed several criminal complaints, and read numerous articles on human trafficking.

Detective Maya Krajcinovic knows based on her training and experience in these investigations as well as consultation with others involved in sex trafficking, that many individuals involved in the commercial sex trade are known as pimps and prostitutes. A pimp is a person who participates in the business of commercial sex by supervising prostitutes and collecting the proceeds of commercial sex acts, while a prostitute is anyone who provides sexual services in exchange for money or other items of value. These individuals frequently advertise prostitution services on the internet by using computers to post advertisements on websites such as Backpage.com. Backpage is an advertising website that offers a wide variety of classified listings. In addition to traditional classified listings, Backpage also has a section dedicated to "adult

entertainment” services. This section of Backpage is commonly used to advertise sexual services. Though officially prohibited from listing illegal services such as prostitution, users circumvent the system by using coded language in such online advertisements. These advertisements frequently contain nude, semi-nude, and/or provocative photographs of the individuals being advertised. These advertisements almost always contain prices for services, and language which denotes the type of services which are available, in a coded or abbreviated language. These services are typically advertised by type of service or length of time. Pimps commonly take the photographs for the prostitution advertisements on cameras, cellular telephones, iPODS, iPADS, and other electronic devices. These photographs can then be uploaded directly to the internet, or transferred to another electronic medium. Pimps also utilize cellular telephones to direct prostitutes in the commercial sex trade, through direct conversation and text messaging. These instructions commonly include when and where to work, and instructions regarding charges for particular services. Pimps commonly retain contact information and photographs of current and former prostitutes on cellular telephones. Pimps commonly use other people’s names to obtain the instrumentalities of sex trafficking, thereby avoiding detection by law enforcement. The nominees are usually prostitutes and other associates in the criminal enterprise, who obtain vehicles, hotel rooms, telephones, and internet services for the pimp.

Benjamin Poller, is a Special Agent with the Wisconsin Department of Justice, Division of Criminal Investigation, and has been so employed since October 1999 and has been a certified law enforcement officer in the State of Wisconsin since 1995. Your affiant is assigned as a narcotics investigator with the WIDPJ-DCI. He has received specialized training in narcotics investigations from the Wisconsin Department of Justice- Division of Criminal Investigation and the United States Drug Enforcement Administration, among others.

He has formal training in the investigation of drug trafficking, including 240 hours of specialized narcotics investigation training with the Wisconsin Department of Justice, Division of Narcotics Enforcement as well as 80 hours of specialized narcotics investigation training with the Drug Enforcement Administration; he has worked with informants in the investigation of drug trafficking, he is familiar with the street names of various drugs; and that he is familiar with the methods that are commonly used by drug dealers to package ship and prepare controlled substances for sale or use. Special Agent Poller has responsibilities that have included assisting in a number of arrests of persons for controlled substance violations and has participated in the execution of several search warrants. During his employment with the Division of Criminal Investigation, your complainant has worked on the investigation of various controlled substance violations throughout the State of Wisconsin, and has been familiar with the habits and practices of controlled substance traffickers. He has made undercover purchases of controlled substances.

Special Agent Poller has conducted numerous heroin investigations, ranging from street level users/dealers to multi-jurisdictional conspiracies. He has interviewed over 100 heroin addicts in his career, and worked with many of them on investigations. special

Agent Poller knows heroin is a very physically addictive and dangerous drug, where your complainant has referred heroin addicts to treatment and has worked with addicts going through rehabilitation. Special Agent Poller has also responded to heroin overdoses, and conducted heroin overdose death investigations. In dealing with heroin addicts Special Agent Poller knows addicts can go through severe withdrawals when they do not have the drug, and many times addicts turn to dire measures to pay for their drug to avoid such withdrawals. He has observed heroin addicts that are going through withdrawal experience vomiting, nausea, muscle aches, runny nose, and sweating.

This complaint is based on the information and belief of your complainant, who is a Court Officer for the City of Madison, and who learned of the above offense(s) from the report(s) of MAPD Police Officer(s) Dean Baldukas, MAPD Detectives Julie Rortved and Maya Krajinovic, and Wisconsin Department of Justice Special Agent Ben Poller which report(s) your complainant believes to be truthful and reliable inasmuch as they were prepared during the course of the officer(s) official duties.

Further, your complainant believes the information furnished by the witnesses to be truthful and reliable inasmuch as Victim 1, Victim 2, Victim 3, and Victim 4 are citizen informants and witnessed the events described.

Further, your complainant believes the information furnished by defendant to be truthful and reliable insofar as they are admissions against penal interest.

Subscribed and sworn to before me,
and approved for filing on:

This _____ day of _____, _____

ASSISTANT/DEP DISTRICT ATTORNEY
DANE COUNTY, WISCONSIN

COMPLAINANT