State of Minnesota County of Ramsey

District Court 2nd Judicial District

Prosecutor File No.
Court File No.

0620537888 62-CR-22-3971

State of Minnesota,

COMPLAINT

Plaintiff.

Order of Detention

VS.

LARRY EDDIE KONAH JR DOB: 08/25/1996

No Permanent Address Saint Paul, MN 55101

Defendant.

The Complainant submits this complaint to the Court and states that there is probable cause to believe Defendant committed the following offense(s):

COUNT I

Charge: Promotes Prostitution of an Individual

Minnesota Statute: 609.322.1a(2)

Maximum Sentence: 20 years or \$40,000 fine or both

Offense Level: Felony

Offense Date (on or about): 07/01/2022 to 07/14/2022

Control #(ICR#): 22000629

Charge Description: On or between July 1, 2022 and July 14, 2022, in the County of Ramsey, Minnesota, Larry Eddie Konah, Jr., did intentionally and while acting other than as a prostitute or patron promote the prostitution of an individual through any of the following: solicits or procures patrons for a prostitute; owns, manages, supervises, controls, keeps or operates, either alone or with others, a place of prostitution to aid the prostitution of an individual.

COUNT II

Charge: Receives Profits From Prostitution

Minnesota Statute: 609.322.1a(3)

Maximum Sentence: 20 years or \$40,000 fine or both

Offense Level: Felony

Offense Date (on or about): 07/01/2022 to 07/14/2022

Control #(ICR#): 22000629

Charge Description: On or between July 1, 2022 and July 14, 2022, in the County of Ramsey, Minnesota, Larry Eddie Konah, Jr., did intentionally and while acting other than as a prostitute or patron, receive profit, knowing or having reason to know it is derived from the prostitution, or promotion of prostitution, of an individual.

62-CR-22-3971 COUNT III

Charge: Engages in the sex trafficking of an individual

Minnesota Statute: 609.322.1a(4)

Maximum Sentence: 20 years or \$40,000 fine or both

Offense Level: Felony

Offense Date (on or about): 07/01/2022 to 07/14/2022

Control #(ICR#): 22000629

Charge Description: On or between July 1, 2022 and July 14, 2022, in the County of Ramsey, Minnesota, Larry Eddie Konah, Jr., did intentionally and while acting other than as a prostitute or patron engage in the sex trafficking of an individual by receiving, recruiting, enticing, harboring, providing, or obtaining by any means an individual to aid in the prostitution of the individual; or receiving profit or anything of value, knowing or having reason to know it is derived from prostitution.

STATEMENT OF PROBABLE CAUSE

On July 14, 2022 the Minnesota Human Trafficking Investigators Task Force received a call from the Ramsey County Sheriff's Office requesting assistance in a human trafficking investigation. The Sheriff's Office had been called to the Comfort Inn and Suites located at 3505 Vadnais Center Drive in Vadnais Heights, Ramsey County, regarding a female who passed a note to hotel staff requesting help. Deputies made contact with the adult female, ANP herein, who disclosed she was a victim of sex trafficking by her boyfriend. The boyfriend was identified as Larry Eddie Konah, Jr (dob 8/25/1996), the defendant herein. The defendant was on scene and taken into custody. ANP was transported to St. John's Hospital.

Task force agents met with ANP at St. John's Hospital. ANP reported she was originally from Atlanta, Georgia and met the defendant there at a party. The two began dating in December of 2021 and ANP stated the relationship was good in the beginning. They moved into an apartment together in Atlanta in February 2022. Shortly after her birthday in February the defendant physically assaulted her, destroyed the apartment and bleached her clothing. ANP reported the sex trafficking started in March 2022 with the defendant forcing her to have sex with men for money through manipulation and physical assaults. ANP described the defendant as very controlling. The defendant would keep her phone, ID and money. She had to make phone calls on speaker phone. ANP reported that the defendant forced her to get his name tattooed under her eye so she would be reminded she belonged to him. Agents observed the tattoo and photographed it.

ANP reported that the defendant would post sex ads for her on various sites, including Megapersonals and Seeking Arrangements. ANP stated that the defendant used both her phone number and his phone number to post the ads but that the defendant would control the phones when sex buyers responded to the ads. ANP said the defendant would also post himself in the ads on occasion to engage in a "threesome". The defendant would make ANP charge \$300 for a half hour, \$600 for an hour and \$200 for a "threesome". ANP stated the defendant would keep all of the money made from the sex acts.

ANP described being trafficked out of various hotels in Minnesota and believed the defendant would book the hotels. They frequently stayed at Motel 6. ANP reported that she averaged 3 to 4 customers a day and that the defendant required she make between \$600-\$1000 per day before she was allowed to stop. ANP reported that the trafficking first occurred in Atlanta and also occurred in Los Angeles.

Most recently ANP and the defendant stayed at the Motel 6 in St. Paul, the Motel 6 in Roseville, the Fairfield Inn in Vadnais Heights and the Comfort Inn in Vadnais (where she requested help). ANP said she was trafficked at all these hotels and the defendant frequently assaulted her. ANP reported that someone called police while at one of the Motel 6 locations when she was assaulted but she was too afraid to report the assault. ANP reported she was hit with a belt. Law enforcement recovered an incident detail report from May 29, 2022 where police were called to the Roseville Motel 6. The report was made because a man was beating a woman with a belt and she was screaming for help. The report contains the defendant's name. ANP stated she sent a video to a friend documenting the injuries she sustained from the assault. ANP provided consent to forensically examine her cell phone. Law enforcement located the

video on ANP's phone and observed her injuries.

After arriving at the Comfort Inn, ANP told defendant she wanted to leave and the defendant appeared willing to let her go. When she attempted to retrieve her ID, the defendant physically assaulted her again. ANP stated the defendant choked her but she did not lose consciousness. The defendant stated he wanted her to "be awake for this". ANP then convinced the defendant that she would stay.

ANP reported being forced to have sex with approximately four or five men on July 13, 2022 at the Comfort Inn. When ANP told the defendant she did not want to engage in any more acts, the defendant held her on the bed and forced her to have sex with him. ANP said she was unable to move. ANP described vaginal penetration and believed the defendant ejaculated inside of her. ANP had a SANE exam done while at St. John's Hospital. The evidence collected from the SANE exam will be submitted to the MN Bureau of Criminal Apprehension for testing.

ANP stated the defendant woke the morning of July 14th and hit her because he had a dream she was trying to leave him. ANP felt she had to escape. ANP had written two notes a few days prior asking for help in getting away from the defendant. ANP put one note in a bottom drawer in the hotel room and another in her back pocket. When ANP and defendant stopped at the front desk to pay for the room, ANP threw the note to staff when the defendant wasn't looking. They then walked to Walmart. Police were at the hotel when they returned.

The defendant was interviewed at the Ramsey County Law Enforcement Center on July 14, 2022. In this post-Miranda statement, the defendant stated he has been dating ANP for approximately nine months. The defendant claimed that ANP was engaging in prostitution on her own and he discovered this while living in Atlanta. This caused them to break up for a period of time but reconciled shortly after. The defendant admitted to traveling to Los Angeles with ANP but did not report any prostitution. The defendant stated that approximately two days ago he and ANP checked into the Comfort Inn. The defendant registered for the room. Law enforcement was able to confirm that the defendant registered for the room through hotel records. The defendant stated ANP engaged in commercial sex inside the hotel room and he acted as her "security" by hiding in the bathroom during the acts. The defendant acknowledged receiving money from ANP after the acts and if the buyers paid in cash, he would keep the money in his wallet and give ANP money if she asked for it. They defendant believed ANP made \$300-\$400 in the past two days from commercial sex.

The defendant denied posting ads online for ANP. However, the defendant gave his contact phone number to law enforcement. This phone number was associated with commercial sex ads depicting photos of ANP posted from July 8, 2022 through July 13, 2022 on the website Megapersonals.com.

NOTICE: Pursuant to Minnesota Statute 609.49, subd. 1 (a) A person charged with or convicted of a felony and released from custody, with or without bail or recognizance, who intentionally fails to appear when required after having been notified that a failure to appear for a court appearance is a criminal offense, or after having been released on an order or condition that the release personally appear when required with respect to the charge or conviction, is guilty of a crime for failure to appear and may be sentenced to not more than one-half of the maximum term of imprisonment or fine, or both, provided for the underlying crime for which the person failed to appear, but this maximum sentence shall, in no case, be less than a term of imprisonment of one year and one day or a fine of \$1,500, or both.

SIGNATURES AND APPROVALS

Complainant requests that Defendant, subject to bail or conditions of release, be:

(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or

(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

Complainant declares under penalty of perjury that everything stated in this document is true and correct. Minn. Stat. § 358.116; Minn. R. Crim. P. 2.01, subds. 1, 2.

Complainant

Rachel Pearson Special Agent

1430 Maryland Avenue E

St. Paul, MN 55106

Badge: 1356

Electronically Signed: 07/15/2022 01:29 PM

Ramsey County, Minnesota

Being authorized to prosecute the offenses charged, I approve this complaint.

Prosecuting Attorney

Jennifer L. Verdeja

345 Wabasha Street N

Suite 120

St Paul, MN 55102 (651) 266-3222 Electronically Signed: 07/15/2022 01:24 PM

FINDING OF PROBABLE CAUSE

Filed in District Court State of Minnesota 7/15/2022

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense(s).

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above-named court to answe	DEFENDANT, ARE SUMMON		cted in the Notice of Hearing before the							
II TOOTALL TO ALT LAIVII			TYARTEST Shall be issued.							
WARRANT										
of Minnesota, that the Defe session), and if not, before a	ndant be apprehended and a	rested without delay a ch court without unnece	is warrant: I order, in the name of the State nd brought promptly before the court (if in ssary delay, and in any event not later than be dealt with according to law.							
Execute in I	MN Only Execu	te Nationwide	Execute in Border States							
X ORDER OF DETENTION										
Since the Defendant is already in custody, I order, subject to bail or conditions of release, that the Defendant continue to be detained pending further proceedings.										
Bail: \$250,000.00 Conditions of Release:										
This complaint, duly subscrib as of the following date: July		er penalty of perjury, is i	ssued by the undersigned Judicial Officer							
Judicial Officer	Andrew Gordon judge	Electro	Electronically Signed: 07/15/2022 03:23 PM							
Sworn testimony has been g	iven before the Judicial Officer	by the following witness	es:							
	COUNTY OF RAMS									
State of	Minnesota									
	Plaintiff	LAW ENFORCE	LAW ENFORCEMENT OFFICER RETURN OF SERVICE							

. . .

VS.

Larry Eddie Konah Jr

Defendant

LAW ENFORCEMENT OFFICER RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this Order of
Detention upon the Defendant herein named.

Signature of Authorized Service Agent:

Filed in District Court State of Minnesota 7/15/2022

DEFENDANT FACT SHEET

Name:	Larry Eddie Konah Jr			
DOB:	08/25/1996			
Address:	No Permanent Address Saint Paul, MN 55101			
Alias Names/DOB:				
SID:	MN19BP5475			
Height:				
Weight:	Olbs.			
Eye Color:				
Hair Color:				
Gender:				
Race:				
Fingerprints Required per Statute:	Yes			
Fingerprint match to Criminal History Record:	No			

Driver's License #:
Alcohol Concentration:

STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	МОС	GOC	Controlling Agencies	Case Numbers
1	Charge	7/1/2022	609.322.1a(2) Promotes Prostitution of an Individual	Felony	Z1383		MNBCA0000	22000629
2	Charge	7/1/2022	609.322.1a(3) Receives Profits From Prostitution	Felony	Z1583		MNBCA0000	22000629
3	Charge	7/1/2022	609.322.1a(4) Engages in the sex trafficking of an individual	Felony	Z1983		MNBCA0000	22000629