## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Hon. Cathy L. Waldor, U.S.M.J.

ν.

Mag. No. 22-9023

AMIN SHARIF

**CRIMINAL COMPLAINT** 

I, Kelsey Granger, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

#### SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and that this complaint is based on the following facts:

## SEE ATTACHMENT B

Continued on the attached page and made a part hereof:

s/ Kelsey Granger

Special Agent Kelsey Granger Federal Bureau of Investigation

Sworn to before me and subscribed in my presence, January 4, 2022 in Newark, New Jersey

HONORABLE CATHY L. WALDOR UNITED STATES MAGISTRATE JUDGE s/ Cathy L. Waldor

Signature of Judicial Officer

## ATTACHMENT A

## <u>Count One</u> (Attempted Sex Trafficking – Victim-1)

From in or around December 2020 to on or about August 2021, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

## AMIN SHARIF,

did knowingly attempt to recruit, entice, harbor, transport, provide, advertise, obtain, and maintain one or more persons, in and affecting interstate commerce, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, and a combination of such means, as defined in 18 U.S.C. § 1591(e)(2), would be used to cause such person or persons to engage in one or more commercial sex acts, contrary to 18 U.S.C. §§ 1591(a) and (b)(1).

In violation of Title 18 United States Code, Section 1594(c).

# Count Two (Sex Trafficking of a Child – Victim-2)

From in or around December 2020, through in or around March 2021, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

## AMIN SHARIF,

did knowingly, in and affecting interstate commerce, and after having had a reasonable opportunity to observe Victim-2, who was 16 years old at the time, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, and solicit by any means Victim-2, knowing and in reckless disregard of the fact that Victim-2 had not attained the age of 18 years and that Victim-2 would be caused to engage in a commercial sex act, contrary to Title 18, United States Code, Sections 1591(a)(1), (b)(2) and (c).

In violation of Title 18, United States Code, Section 1594(a).

### ATTACHMENT B

- I, Kelsey Granger, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.
- 1. Since in or around January 2021, the FBI has been investigating Amin Sharif ("Sharif") for transporting and attempting to transport women and minors from various states to New Jersey and elsewhere for the purpose of engaging in commercial sex acts and other illicit conduct.
- 2. In or around December 2020, an individual using the Facebook username "Dallas Love," who the investigation has revealed was Sharif, contacted an adult woman ("Victim 1"), via Facebook. During these communications, Sharif complimented Victim 1 on her physical appearance and informed Victim 1 that he wanted to help Victim 1 make money.
- Then, Sharif electronically introduced Victim 1 to a man known as 3. "Razzle." Razzle presented himself as the owner/operator of a commercial sex business and stated he would serve as Victim 1's manager. The investigation has since revealed that "Razzle" was also Sharif. Throughout their communications, Sharif, posing as "Razzle," described his sex business to Victim 1. Sharif told Victim 1, in sum and substance, that he maintains a business named "Trick or Treat," which offers prostitution and escort services and is accessible online via a website that advertises commercial sex acts. Sharif further told Victim 1, in sum and substance, that he charges customers who are interested in having sex with a "beautiful woman" approximately \$1,000 per day, approximately \$7,000 per week, approximately \$280,000 per month, and up to approximately \$1.3 million per year. Sharif also informed Victim 1, in sum and substance, that he operates from a massage parlor located in Manhattan, New York or New Jersey that has a backroom for "extra" (i.e. sexual) services; has transported "girls" from the United States to the Dominican Republic and Jamaica to perform sex acts; and "collects girls," including minors, from Pennsylvania to "make money."
- 4. During their communications, Sharif, posing as "Razzle," attempted to coerce Victim 1 into prostitution. In particular, Sharif said to Victim 1, in sum and substance, "I've got naked pictures of you, I'm going to expose you on every website. Take a commercial bus to New York to go be a prostitute." Sharif

further instructed Victim 1, who did not reside in New York at the time, to travel by commercial bus to New York to work as a prostitute. Victim 1 declined, and then Sharif, posing as both "Dallas Love" and "Razzle," began threatening Victim 1. Specifically, Sharif informed Victim 1, in sum and substance, "We will find you, we know where you live, we know your kids' names and where they go to school," "[will will] come and take [Victim 1] away," and "that's fine. We're armed we'll come get you."

- 5. As stated above, law enforcement later determined that "Razzle" and "Dallas Love" are Sharif. For example, based on an analysis of Razzle's social media accounts, law enforcement determined that the Facebook and Instagram accounts that "Razzle" used to communicate with Victim 1 belong to Sharif. Specifically, "Razzle's" Instagram account is registered to an email address that includes Sharif's first and last name and photos purportedly depicting "Razzle' and associated with "Razzle's" Facebook and Instagram accounts, match photos of Sharif, which were captured in connection with prior arrests and obtained by law enforcement during this investigation.
- 6. Based on the investigation, law enforcement believes that Sharif intended to transport Victim 1 across state lines for the purpose of engaging in commercial sex acts. Indeed, law enforcement determined that Sharif purchased a plane ticket for Victim 1 to travel via a commercial airline from another state to Newark, New Jersey. Victim 1, however, declined the invitation, explaining that she could not travel at that time.
- 7. Law enforcement identified an additional minor victim ("Victim 2"). Specifically, in or around December 2020, Sharif, posing as "Dallas Love," contacted Victim 2, using social media. During these communications, Sharif suggested that Victim 2 travel to New York or New Jersey to work as an exotic dancer. The investigation has revealed that, Victim 2 told Sharif that she was 16 years old at the time. In response, Sharif promised Victim 2 that he would obtain fake identification for her when she arrived in New Jersey.
- 8. Further, law enforcement identified sexually explicit photographs of Victim 2, posted on or about January 9, 2021, on the same website that Sharif told Victim 1 he uses for his commercial sex business. In addition to the sexually explicit photographs, the advertisement was titled "Ready and waiting," described Victim 2 as a 21-year-old woman (although Victim 2 was then, and is now, a minor), listed approximately 32 sexual services provided by Victim 2, and included a cellular phone number used by Sharif as the contact telephone number for Victim 2.