

UNITED STATES DISTRICT COURT

for the

Eastern District of California



United States of America)
v.)
Keynin McGee)

Case No. 1:26-mj-00021 SAB

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2021 in the county of Fresno in the Eastern District of California, the defendant(s) violated:

Table with 2 columns: Code Section (18 U.S.C. § 1591(a)(1) (a)(2), (b)(1), and (c)), Offense Description (knowingly, in or affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain, by any means, a person: (1) knowing, and in reckless disregard of the fact that the person had not yet attained the age of 18 years, and having had a reasonable opportunity to observe the person, and that the person would be caused to engage in a commercial sex act and (2) knowing, and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means would be used to cause the person to engage in a commercial sex act.)

This criminal complaint is based on these facts:

Please see the attached affidavit of FBI Special Agent Nicholas Mendoza (incorporated by this reference)

Maximum Penalties Custody: 10 years - Life
Fine: \$250,000
Supervised Release: Lifetime
Penalty Assessment: \$100

Continued on the attached sheet.

Handwritten signature of Nicholas Mendoza

Complainant's signature

Nicholas Mendoza, Special Agent

Printed name and title

Sworn to before me by telephone consistent with Fed. R. Crim P. 4(d) and 41(d)(3)

Date: Mar 4, 2026

Handwritten signature of Stanley A. Boone

Judge's signature

City and state: Fresno, California

Hon. Erica P. Grosjean - U.S. Magistrate Judge

Printed name and title

Stanley A. Boone-United States Magistrate Judge

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Nicholas Mendoza, state the following under penalty of perjury:

I. AGENT BACKGROUND

1. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C) which means I am a federal law enforcement agent engaged in enforcing criminal laws and authorized to request a criminal complaint and an arrest warrant.

2. I have been employed as a special agent (SA) with the Federal Bureau of Investigation (FBI) since October 2024. I have successfully completed the 20-week FBI Basic Field Training Course in Quantico, Virginia. During my time at the FBI Academy, I received training in a variety of investigative and legal matters, including Fourth Amendment searches, drafting of search warrants and complaint affidavits, and probable cause. I also received 40 hours of cyber-crime training, which included training on cellular devices. I have also attended trainings and conferences specifically focused on investigating human trafficking organizations.

3. I received a Bachelor of Science degree in sociology from Vanguard University in Costa Mesa, California with a minor in Women Studies and an emphasis in Human Trafficking. Prior to my career with the FBI, I was a Deputy Probation Officer in Fresno County, California. As a Deputy Probation Officer, I supervised youth who were on probation for committing various crimes and probationers convicted of engaging in commercial sexual exploitation of children (CSEC). Throughout my career, I have attended trainings and worked with various law enforcement agencies to investigate a variety of cases to include human trafficking.

4. I am currently assigned to the FBI Sacramento Division–Fresno Resident Agency as a member of the Violent Crime Squad. I am also assigned to Central California Internet Crimes Against Children (ICAC) Task Force and the Fresno Police Department (FPD) VICE Unit, where my duties and responsibilities include investigating criminal violations relating to the sexual exploitation of children (SEOC) and human trafficking as well as other federal and state violations. I have investigated SEOC and human trafficking violations since 2024 and have received in-service trainings in the investigation and enforcement of federal child sexual exploitation and human trafficking laws.

5. I am familiar with the facts and circumstances of the investigation of Keynin McGee

1 (McGEE) described below through my personal participation as well as from discussions with other
2 FBI agents and other law enforcement investigators. I have also reviewed records, reports, and
3 interviews relating to the investigation. Because this Affidavit is being submitted for the limited
4 purpose of obtaining a criminal complaint, I have not included every fact known to me concerning this
5 investigation. I have set forth only the facts that I believe necessary to establish probable cause that
6 evidence of the violations further described below have been committed.

7 **II. SUMMARY OF PROBABLE CAUSE AND ALLEGED OFFENSES**

8 6. The FBI and California Department of Corrections and Rehabilitation (CDCR) are
9 investigating McGEE for the sex trafficking of multiple female victims, and at least one victim who was
10 under the age of 18 at the time at the time of the alleged offense. More specifically, this investigation
11 has focused on violations of Title 18 U.S.C. § 1591(a)(1), (a)(2), (b)(1), and (c), which makes it a crime
12 to knowingly, in or affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide,
13 obtain, and maintain, by any means, a person: (1) knowing, and in reckless disregard of the fact that the
14 person had not yet attained the age of 18 years, and having had a reasonable opportunity to observe the
15 person, and that the person would be caused to engage in a commercial sex act and (2) knowing, and in
16 reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination
17 of such means would be used to cause the person to engage in a commercial sex act.

18 **III. INVESTIGATION BEGINS AFTER CONTRABAND PHONE**
19 **SEIZED FROM MCGEE**

20 7. On January 31, 2023, McGEE was serving a prison sentence at California Correctional
21 Institution (CCI) in Tehachapi, California for sex trafficking a minor in Norco, California. Prison
22 officials found in or near McGEE's assigned bunk, and then seized, a contraband Samsung cellular
23 phone (cell phone). McGEE was then transferred to Sierra Conservation Center in Jamestown,
24 California. While in custody at Sierra Conservation Center, McGEE was sentenced to a new term of 3
25 years for an additional offense and is currently in prison at California Rehabilitation Center in Norco,
26 California.

27 8. On March 14, 2023, CDCR investigators completed a digital forensic examination of the
28 Samsung cell phone found in McGEE's possession in Tehachapi. Investigators saw numerous instances

1 of **McGEE** working alone and with others to instruct multiple women to engage in commercial sex acts
2 for his financial benefit. Prison officials found two additional contraband cell phones in **McGEE**'s
3 possession, one on October 22, 2022, and the other on July 20, 2023.

4 **INTERVIEW OF SEX TRAFFICKING CONFIDENTIAL MINOR VICTIM #1**

5 9. On December 19, 2025, and February 18, 2026, I and others interviewed a person (Minor
6 Victim 1 or MV1) who is now an adult but who was a minor when **McGEE** directed her to engage in
7 commercial sex acts with multiple men.

8 10. During these interviews, MV1 stated she first engaged in commercial sex acts in Texas
9 when she was approximately 15 years old. MV1 met **McGEE** on Instagram when she was 17 years old
10 when **McGEE** messaged MV1 through the application. **McGEE** continued messaging MV1 for the
11 next few months during which time she learned he lived in Oakland, California.

12 11. In approximately January 2021, a few months after **McGEE** first messaged her online,
13 MV1 traveled to the greater Los Angeles (LA) area where she engaged in commercial sex services for
14 the financial benefit of a man she knew as "Bounce Out." Bounce Out physically assaulted MV1 shortly
15 after she arrived in LA, so MV1 contacted **McGEE**. MV1 reached out to **McGEE** because she did not
16 know anyone else in California.

17 12. **McGEE** purchased a Greyhound bus ticket for MV1 to travel from LA to Oakland and
18 used his cell phone to send her a screenshot of the ticket. McGee directed MVI to share her location with
19 him so he could track her movements. MVI complied with McGee's direction. **McGEE** purchased the
20 ticket for MV1 in a false name. MV1 used the bus ticket to travel from L.A. to Oakland. The bus MV1
21 took from L.A. to Oakland included a route that had stops in Modesto and Bakersfield.¹

22 13. **McGEE** picked up MV1 at the bus station in Oakland. Soon after he picked her up,
23 **McGEE** told MV1 he would "elevate her," a word MV1 knew "pimps" used to convey their interest in
24 directing women to engage in commercial sex acts for the financial benefit of the pimp. **McGEE** also
25 took MV1 to a clothing store and bought her a bodysuit for her to wear while working in commercial
26 sex.

27
28 ¹ These locations are in the Eastern District of California.

1 14. **McGEE** took MV1 to a motel where he instructed her to put on the outfit he purchased
2 and take photographs so he could post commercial sex advertisements for her online. Online
3 advertisements were posted on Skipthegames.com, a website used to buy and sell commercial sex acts.
4 Investigators have seen advertisements from January 2021 that feature photographs of MV1 wearing the
5 outfit **McGEE** purchased for her and advertising her for commercial sex. Some of the advertisements
6 featured **McGEE**'s phone number as the point of contact for potential sex buyers.

7 15. While they were at the same motel, **McGEE** took and searched MV1's cell phone. MV1
8 has stated that the phone contained text messages from others suggesting she was young and had run
9 away from her home in Houston, Texas. Additionally, he told MV1 he "knew" she was not "as old as
10 she said she was originally," and asked to see her identification. MV1 told **McGEE** she did not have
11 any identification. **McGEE** did not make any additional efforts to confirm MV1's age. MV1 stated she
12 later admitted to **McGEE** she was under the age of 18.

13 16. While in the same hotel, **McGEE** had sex with MV1, claiming he wanted to test "the
14 product" even though MV1 told him she did not want to have sex with him.

15 17. After having sex with MV1, **McGEE** took MV1 to an area on International Boulevard in
16 Oakland known as "the Blade," or an open-air sex market where women walk the street soliciting sex
17 buyers who drive by in cars. MV1 engaged in commercial sex acts on the Blade at **McGEE**'s
18 instruction. **McGEE** took MV1's earnings. MV1 engaged in-commercial sex acts at **McGEE**'s
19 instruction because she was alone in a strange city, had no money, and no transportation other than
20 **McGEE**. Additionally, she was afraid **McGEE** might subject her to physical abuse if she refused.

21 18. Text messages recovered from **McGEE**'s cellular phone, searched under authority of a
22 state of California search warrant, indicate **McGEE** instructed MV1 to engage in commercial sex acts.
23 For example, the text messages include: (1) "Happy Hoeing"; (2) "I'm comin [sic] down International";
24 (3) Got off those 3 condoms then we gon [sic] get your nails done"; (4) "Pimpin gone bounce back u
25 still my bitch"; and (5) "I like u frfr² u forever my bottom bitch³ frfr."

26
27 ² "Frfr" means "for real, for real."

28 ³ "Bottom bitch" is a term to describe a pimp's highest earning, favorite, or longest serving sex worker.

1 19. Other text messages recovered from **McGEE**'s phone and sent to MVI show **McGEE**
2 threatened her with physical violence. For example, **McGEE** sent the following texts to MVI on
3 January 18, 2021: (1) "if I catch u on San Jose oor [sic] that blade right there I'm shootin u. Any blade
4 in the bay I'm shootin on my dead momma in trust me in my car right now"; (2) "Bitch ima give u one
5 more chance"; (3) "I'm finna come to the station in beat yo ass in pistol whoop u"; (4) "Bitch u dead
6 bitch walkin-in"; (5) "I'm shooting u bitch"; and (6) "I'ma [sic] really kill u."

7 20. **McGEE** also took MVI to San Francisco to engage in commercial sex acts in that city.
8 **McGEE** took MVI's cellular phone away from her and provided his own phone without the password.
9 MVI was unable to make any outgoing phone calls or text messages during this time. MVI escaped
10 **McGEE** when an officer with the San Francisco Police Department encountered her soliciting clients
11 for commercial sex in San Francisco. The officer took MVI to a shelter that assisted MVI in leaving
12 **McGEE**.

13 **IV. CONCLUSION**

14 21. Based on the totality of facts set forth in this affidavit, I believe there is probable cause to
15 believe that **Keynin McGEE** violated Title 18, U.S.C. § 1591(a)(1), (a)(2), (b)(1), and (c) which makes
16 it a crime to knowingly, in or affecting interstate and foreign commerce, recruit, entice, harbor,
17 transport, provide, obtained, and maintain, by any means, a person: (1) knowing, and in reckless
18 disregard of the fact that the person had not yet attained the age of 18 years, and having had a reasonable
19 opportunity to observe the person, and that the person would be caused to engage in a commercial sex
20 act and (2) knowing, and in reckless disregard of the fact that means of force, threats of force, fraud,
21 coercion, and any combination of such means would be used to cause the person to engage in a
22 commercial sex act. Accordingly, I request the issuance of a criminal complaint and arrest warrant. I
23 declare under penalty of perjury that the facts contained herein are true and correct to the best of my
24 knowledge and belief.

25 

26 _____
27 Nicholas Mendoza, Special Agent
28 Federal Bureau of Investigation

1 Attested to by the applicant in accordance
with the requirements of Fed.R.Crim.P. 4.1
2 and 41(d)(3), by telephone on
Mar 4, 2026

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5 
The Honorable Stanley A. Boone
United States Magistrate Judge

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7 Approved as to form:

8 /s/ David Gappa _____
Assistant United States Attorney

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