

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Lori Robinson, having been duly sworn, hereby depose and state:

AGENT BACKGROUND

1. I am a Special Agent with United States Immigration and Customs Enforcement Homeland Security Investigations (“HSI”) and have been so employed since 2014. I am currently assigned to the Manchester, New Hampshire field office. I am authorized to investigate crimes involving violations of Title 18, Title 8, Title 19, and Title 21 of the United States Code (USC). As part of my regular duties as an agent, I investigate criminal violations relating to a broad range of immigration and customs related statutes, including those relating to child exploitation, child pornography, and human trafficking. I have received training in the area of child pornography and child exploitation. I have assisted investigations and executed search warrants involving child exploitation and child pornography offenses, including search warrants of electronic devices. I have received training relating to the trafficking in persons, including sex trafficking, and other offenses.

2. I have participated in investigations of human trafficking, human smuggling, alien harboring, border violations, drug and firearm trafficking, and related offenses. Many of these investigations have had national or international connections, and many required me to work closely and share information and intelligence with members of other federal, state, and local law enforcement agencies. I have debriefed, and continue to debrief, defendants, informants, and witnesses who have personal knowledge about human trafficking, including sex trafficking, and other crimes occurring in New Hampshire, nationally, and abroad.

3. From my training and experience, I know that individuals are trafficked for several purposes. Some forms of human trafficking involve involuntary servitude, peonage, debt bondage

and slavery. Victims are often trafficked by force, fraud, and/or coercion. I am familiar with the federal laws regarding human trafficking, including 18 U.S.C. §§ 1591 and 1594 (Sex Trafficking).

4. This affidavit is submitted in support of a criminal complaint charging Stacey Ray Lancaster with Attempted Sex Trafficking of a Child, in violation of 18 U.S.C. §§ 1591(a)(1), (b)(1) and 1594(a).

5. As described below, there is probable cause to believe that, on November 14, 2024, in and around Manchester, in the District of New Hampshire, Lancaster did knowingly attempt to, in and affecting interstate and foreign commerce, entice, obtain, solicit, and patronize by any means a person, knowing and in reckless disregard of the fact that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act.

6. This affidavit is based on my personal investigation and investigation by others, including federal and state law enforcement officials whom I know to be reliable and trustworthy. The facts contained herein have been obtained by interviewing witnesses and examining data obtained in the course of the investigation as well as through other means. This affidavit does not include every fact known to me about this investigation, but rather only those facts sufficient to establish probable cause.

FACTUAL BACKGROUND

7. Beginning on or about November 14, 2024, law enforcement agents posted an advertisement (the “Advertisement”) on a website commonly used to advertise commercial sex acts.¹ The Advertisement contained images of what appeared to be two young females and the following language:

¹ Based on my training and experience, I know that the Internet is global network of computers, which is a means and facility of interstate commerce. I also know that the website on which the Advertisement was posted is viewable outside of New Hampshire.

“Sweet & tight! Ready 2 have some fun!”

“In town 4 a limited time only”

“Cute & very petite girl that is tight from head to toe! Cum over to play with me!”

“Text for donations. Incall only – safe and discrete location.”

8. The Advertisement indicated that the person who would perform commercial sex acts was 99 years old.² The Advertisement also contained a contact phone number (the “Advertisement Number”). Law enforcement agents monitored this line and an undercover agent (“UC1”) used it to communicate with potential sex buyers, including Lancaster.

9. On or about November 14, 2024, the Advertisement Number received a text message from a phone number ending in 7403 (the “7403 Number”) in response to the Advertisement. Thereafter, a text conversation between UC1 and the user of the 7403 Number ensued. UC1 stated that he/she had two minor girls—ages 12 and 14 years old—available to perform sex acts in exchange for money. The user of the 7403 Number agreed to pay \$100 to have sex with the 12 year-old girl:

Lancaster	Hi are you available for a QV incall? ³
UC1	hey hun.. ive got 2 beauties im bookin dates for
Lancaster	Can you send me there pictures? Also is cash ok? It be ready around 3:15
UC1	here u go hun.. this is my sweet izzy shes 12 yo but lots of fun
UC1	[Photograph sent] ⁴
Lancaster	Did you say she’s 12? Are you being serious. That’s really bad if that’s true.
UC1	hun i dont force her.. she enjoys it. if this isnt ur thing its cool 😊
Lancaster	Are you affiliated with any law enforcement?
UC1	No!!! And i dont need trouble. r u with police?? if u are u gotta tell me!

² The law enforcement agents used a website that is known for containing prostitution advertisements but requires users to be at least 18 years old. Based on my training and experience, I know that this website and others like it have been used by traffickers to advertise the commercial sex acts of children under the age of 18.

³ I know, based on my training and experience, that “QV” stands for “quick visit” or a 15-minute visit.

⁴ Photographs sent did not depict an actual minor.

Lancaster	I am not affiliated with any law enforcement.
Lancaster	Do you accept cash.
Lancaster	Do you have anyone older too?
UC1	cashis best hun.. been scammed with apps b4 n dont really like them
UC1	nah hun sorry just my two cute girls
Lancaster	Is 100 ok. Can you send a picture of the other one?
UC1	here u go hun
UC1	[Photograph sent]
Lancaster	How old?
Lancaster	Also where are you located.
UC1	This last pic is Leila.. shes 14 years old but has lots of experience
UC1	were at a hotel here in manchester hun
Lancaster	Which hotel.
UC1	hun for safety reasons i dont give hotel until i know ur serious.. cant just be giving out our hotel hope u understand
UC1	u wanna see one or both?
Lancaster	Just 1 you pick. 100 ok? I'll be there at 3:15. What's the location.
UC1	its ur time and money hun.. u tell me which ud like.. izzy or leila 🤔 both know how to have a good time 🍷
Lancaster	Let's do Izzy.
UC1	okay hun.. i got u down with izzy u still lookin at 315? r u going to want bare?
Lancaster	No not bare yes 3:15
UC1	\$100 not bare is qv hun hh is \$150
UC1	is that okay?
Lancaster	Ok yes QV.
UC1	r u bringing condoms or u can just use the ones we have here up to you hun
Lancaster	Yours is fine.
Lancaster	Ok just the location.
UC1	lmk when ur ready hun n ill send u the hotel .. just no rough stuff bc shes only 12 but i got you down for 315pm. ill make sure shes ready for you 🤔
Lancaster	Ok
Lancaster	On my way... where's it at.

10. UC1 then provided Lancaster the address of a hotel in Manchester, NH⁵ (“Hotel”) as the location of the date with the 12 year-old girl.

11. Shortly thereafter, Lancaster arrived at the Hotel. At the Hotel, there was another undercover agent (“UC2”), who was posing as the person who posted the Advertisement and the

⁵ The hotel is part of a national chain of hotels.

user of the Advertisement Number. Lancaster approached UC2 in the parking lot of the Hotel and the two had a conversation. Lancaster expressed nervousness about the transaction and asked if he could go up and meet with the 12-year-old girl in the Hotel room. UC2 asked if Lancaster could show him the cash for the transaction as agreed through the prior message exchange with UC1. Lancaster showed UC2 his phone, which had cash and a bank card in the mobile phone wallet attached to the back of the phone. Lancaster asked if UC2 could touch in his crotch area in order to demonstrate to Lancaster that UC2 was not affiliated with law enforcement. UC2 did so. Lancaster then asked if he could touch UC2 and then touched UC2's breast. Lancaster then confirmed that he was willing to use a condom and that he would leave the money with the 12-year-old girl.



12. Law enforcement officers then arrested Lancaster and took him into custody. Lancaster declined to make any statements to law enforcement.

CONCLUSION

13. Based on the foregoing, I respectfully submit that there is probable cause to support a criminal complaint charging Lancaster with attempted sex trafficking of a minor, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1) and 1594 (attempted sex trafficking of a minor).

/s/ Lori Robinson
Lori Robinson, Special Agent
Homeland Security Investigations

Attested to by the applicant in accordance
with the requirements of Fed. R. Crim. P. 4.1
by phone, on this 15th day of November 2024.

HONORABLE ANDREA K. JOHNSTONE
UNITED STATES MAGISTRATE JUDGE