



Case No. 2021CR4241

**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT AND COURT ORDER FOR
PRODUCTION OF RECORDS PURSUANT TO 18 U.S.C. §2703, AND C.R.S. §16-3-301,
§16-3-301.1, §19-2.5-205**

I, Investigator Adam String, DA95, state under oath that I have reason to believe at the place or business known or described as:

**US Bank, NA
Attn: Legal Department, Subpoenas/Court Orders
BC-MN-H21P 800 Nicollet Mall
Minneapolis, MN 55402**

Service via a Local Branch

There is now located the following described property or contraband:

Records in reference to US Bank account ending in #5351, US Bank credit card [REDACTED] and all accounts belonging to Robert Hawkins, DOB 9/5/1979, from 10/1/2018 to 11/9/2021:

The following information obtained, created, or provided related to the above accounts:

- **All personal identifying information relating to the account holder, including name(s) on the account, addresses, email addresses, phone numbers, photos, and any other personal identifying information collected;**
- **All documents, books and records including bank statements of all bank activity related to the above accounts, account applications, signature cards, contracts, bank statements, notices, communications, images of front and back of checks, deposit slips, deposit items, withdrawal slips, withdrawal items, account closure forms, visual or other description of deposited items;**
- **Full account numbers of transfers of money to and from accounts, wire transfers;**
- **Safe deposit box agreements, safe deposit box logs, safe deposit box documents and information, and safe deposit contents;**
- **Loan applications and loan documentation, loan payments, line of credit applications, line of credit documentation and line of credit payments;**
- **Credit card applications, credit card statements, credit card payments;**
- **Books and records reflecting and relating to the use, disbursement, and/or other disposition of funds which pertain to the following entity and/or employer identification/tax identification number and a visual and itemized representation of the before mentioned;**
- **Any photos and/or video of deposit or withdrawal transactions/activities and a photo identification of the account/card holder(s), to include surveillance videos of all such transactions that remain available;**

- **All IP addresses and other geolocation information collected in reference to the above account from devices that have been used to log into the account through an application or web browser;**
- **All device identifiers collected in relation to the above account that have been used to log into the account, including IMEI, IMSI, MEID, and MAC addresses.**

NOTICE: IF AVAILABLE, IN ADDITION TO HARDCOPIES FOR COURT PURPOSES, PLEASE ALSO INCLUDE AN ELECTRONIC COPY OF EACH ACCOUNT'S ACTIVITY LOG, ALSO REFERRED TO AS A TRANSACTION HISTORY REPORT OR AN ACCOUNT TRANSACTION LOG, IN EITHER .XLS, .XLSX, .TXT OR .DAT FILE FORMAT. PLEASE PROVIDE SEPARATE ELECTRONIC FILES FOR EACH ACCOUNT.

For which a Search Warrant may be issued pursuant to the provisions of 18 U.S.C. §2703, Crim. P. 41, CRS §16-3-301, §16-3-301.1, and §19-2.5-205, namely that this property is stolen or embezzled, or is designed or intended for use as a means of committing a criminal offense, or is or has been used as a means of committing a criminal offense, or the possession of which is illegal, or would be material evidence in a subsequent criminal prosecution in this state or another state, or the seizure of which is expressly required, authorized or permitted by any statute of this state, or which is kept, stored, maintained, transported, sold, dispensed, or possessed in violation of a statute of this state, under circumstances involving a serious threat to public safety or order or to public health, or which would aid in the detection of the whereabouts of or in the apprehension of a person for whom a lawful arrest warrant is outstanding.

The facts tending to establish the grounds for issuance of a Search Warrant are as follows:

Your Affiant, Adam String, is a Criminal Investigator with the Human Trafficking Unit of the Denver District Attorney's Office (2nd Judicial District – State of Colorado). Your Affiant has worked at the Denver DA's since 2019 and has over 12 years of law enforcement experience in the State of Colorado. Your Affiant has received training in numerous areas of law enforcement including, but not limited to, the investigation of crimes against persons, property crimes, human trafficking crimes, computer related crimes, search and seizure, and the acquisition and preservation of evidence. Your Affiant has also been trained to meet the requirements for Colorado POST Certification.

Your Affiant believes that probable cause exists to show that Robert HAWKINS (DOB 9/5/1979) has committed the crimes of Human Trafficking for Sexual Servitude of a Minor CRS 18-3-504(2), Pimping of a Child CRS 18-7-405, Contributing to the Delinquency of a Minor CRS 18-6-701, Sexual Assault on a Child CRS 18-3-405(1), Procurement of a Child for Sexual Exploitation CRS 18-6-404, Human Trafficking for Sexual Servitude CRS 18-3-504, and Pimping CRS 18-7-206.

Your Affiant obtained the following information from personal observations, witness interviews, reviewing police and official reports of other government agencies, and corroboration of allegations presented. Your Affiant relates the following in support of a warrant to search the above-described accounts:

Statement of Probable Cause

On 12/17/2019, DPD Det. Thomas, with the Human Trafficking Unit, began investigating information she received from the Asian Pacific Development Center (APDC), a community victim service agency that specializes in working with victims of human trafficking and other crimes. APDC reported that they were working with a victim, who wanted to report human trafficking concerns to law enforcement. [REDACTED] (DOB 2/13/1979) met with Det. Thomas at DPD Headquarters and reported having met Robert HAWKINS at a motel on Colfax Ave in Aurora, CO, around October or November of 2018. [REDACTED] was using narcotics at the time and expressed interest in working for HAWKINS to sell drugs for him. She began an intimate relationship with HAWKINS shortly after this. At the time, she met other females working for HAWKINS, but she believed them to be involved in drugs only and was not concerned about HAWKINS having a relationship with them. HAWKINS told her that the other girls were escorting, a term Your Affiant knows to be synonymous with prostitution, and that he was “running” them. He convinced [REDACTED] to begin posting ads for herself, which is something she had previous experience with from when she was in her 20s.

HAWKINS also told [REDACTED] that he was trying to get another girl to come work for him, and that he was using dope as a means to recruit her for prostitution and commercial sex services. [REDACTED] showed Det. Thomas her phone with HAWKINS’ contact information in there, and he was listed under the nickname “Tidal” in her phone. They moved to another hotel shortly after this, and [REDACTED] would have customers come to the hotel for the commercial sex transactions. HAWKINS would wait in the car or go sell narcotics while [REDACTED] was with the sex buyers. HAWKINS began taking some or all of the money she was making from the sex buyers and would demean her if she tried to give some to her child’s father. This made [REDACTED] feel guilty, so she gave HAWKINS the money instead, despite her initial plan to keep the money for herself. HAWKINS also told [REDACTED] that she owed him for giving her drugs and a place to stay. While he would not specifically tell her to give him the money, she was also fearful from all of the stories he told her about beating people up and kicking them out. At that time, [REDACTED] had no place to live, and she knew if HAWKINS kicked her out, she would be living on the streets. [REDACTED] had approximately 3 to 4 sex buyers per day, and she began giving HAWKINS all of her money from the commercial sex transactions shortly after they moved to another hotel. HAWKINS controlled all of her money and would fully account for any money he gave to her. He also kept on her about posting and asking her how much she was charging the sex buyers. At one point, HAWKINS told [REDACTED] that she was responsible for what the other girls were doing and how they were earning money.

HAWKINS eventually began physically assaulting [REDACTED]. The first time he put his hands on her, HAWKINS was on top of her on the bed, and he began strangling her with both hands. [REDACTED] eventually lost consciousness. When she woke up, HAWKINS was leaving the room. He told her to get her “shit together,” or he would kill her. She was assaulted periodically by HAWKINS until she left.

On 10/7/2020, the National Center for Missing and Exploited Children (NCMEC) made a report to the FBI Child Exploitation Human Trafficking Task Force (CEHTTF) involving a seventeen-year-old female. The report stated the minor victim, [REDACTED] was advertising herself on the website “OnlyFans” screen name [REDACTED] soliciting sex. This case

was assigned to DPD Det. Shanna Michael, who partnered with CSP Investigator Brian Tillery, both assigned to the CEHTTF.

On 10/20/2020, [REDACTED] mother, [REDACTED] contacted Det. Michael to report [REDACTED] had returned home from being listed as a runaway. [REDACTED] told Det. Michael she asked [REDACTED] who “hurt” her. [REDACTED] replied, “Tadow”. [REDACTED] told her mother that she was “prostituted” at two locations, the Knights Inn (14200 E. 6th Avenue, Aurora, CO) and at condominiums in downtown Denver. [REDACTED] told [REDACTED] that another youth, [REDACTED] had also been prostituted from the Denver Condominium belonging to “Tadow.”

On 10/29/2020, [REDACTED] participated in a forensic interview with FBI Child and Adolescent Forensic Interviewer, Stephanie Knapp. Inv. Tillery researched a commercial sex advertisement featuring [REDACTED] and an unknown female located on the website, skipthegames.com. Your Affiant knows through experience that www.skipthegames.com is commonly used to advertise individuals engaged in prostitution and commercial sex services. The advertisements typically contain photographs of females in seductive poses and include contact information such as email addresses or phone numbers. This specific advertisement [REDACTED] was posted/re-posted on June 28-29, 2020. The advertisement was posted under phone number 310-299-3001. During the interview, [REDACTED] stated she ran away from home on 5/23/2020 and returned home on approximately 10/22/2020. During the time she was on the run, she spent most of her time with an old friend from school, later identified as 17-year old, [REDACTED] introduced [REDACTED] to “companionship dates” where she would go on dates with older men in exchange for monetary compensation and gifts. [REDACTED] learned that [REDACTED] was making more money by “tricking”. [REDACTED] described “tricking” as, engaging in sex acts with men for money. [REDACTED] described a “trick” as a sex buyer. [REDACTED] arranged the first sex date that [REDACTED] performed. [REDACTED] believed the sex buyer was charged \$500 for the sex acts with [REDACTED] never saw the money. [REDACTED] collected the money from the sex buyer when he arrived and gave the money to a person described as Black male with a bald head and beard known as “Tadal” (later identified as Robert HAWKINS, DOB 9/5/1979), who would become [REDACTED] pimp. The next date [REDACTED] went on was with HAWKINS. He took her to a nice, unknown, restaurant near downtown Denver. When they finished eating, he took [REDACTED] to his apartment. [REDACTED] believed the apartment was at a complex near downtown Denver called the [REDACTED].” When they arrived in the apartment, HAWKINS introduced [REDACTED] to three girls in his apartment as their “new girl.” One girl went by [REDACTED] [REDACTED] was HAWKINS’ favorite and had been with him the longest. The second girl was 13 or 14 years old, but [REDACTED] did not know her name (later identified as [REDACTED]). The third girl was [REDACTED].

[REDACTED] described HAWKINS as her “master.” The girls had to serve HAWKINS by doing things like making him meals and making money for him through commercial sex acts. [REDACTED] only knew him by “Tadal,” and he stated he wanted her to call him “Tadal” or “Daddy.” [REDACTED] saw something in his room with “Tadal the P” written on it. [REDACTED] stated when she first met HAWKINS she was not “up to par.” HAWKINS stated, “to make money you have to look like money.” [REDACTED] stated the girls were required to make a minimum of \$500 per day. They were also required to make a \$5,000 quota to gain HAWKINS’ trust. This quota was intended to help pay for a fake identification and birth certificate in order for the girls to travel to and perform sex work in California.

█████ described that she was disobedient to HAWKINS' rules and on 7/4/2020, she attempted to take his car and leave the apartment. HAWKINS had security cameras in his apartment and caught her. Later that day, he had ██████ physically assault ██████ as punishment. ██████ believed this was only a "teaser" of what HAWKINS was capable of doing if she tried anything again. The Skipthegames advertisement featuring ██████ was presented to her during the interview. ██████ identified herself in the ad and stated the other female in the ad was ██████. ██████ described two of the three pictures were taken in HAWKINS' apartment and one was taken at a "tricks" place. ██████ explained that ██████ took care of posting the advertisements and did so on multiple websites.

On 11/2/2020, Inv. Tillery sent a request to skipthegames.com for records relating to the commercial sex advertisements featuring ██████ and an unknown female. On 11/4/2020, skipthegames.com provided account details and IP addresses for the account ██████ was posted from. This account was created with email address ██████. The phone number on the account was changed multiple times over the life of the account. The account showed postings primarily in Denver, Colorado and Los Angeles, California. Inv. Tillery conducted research through law enforcement database for associations with the email address ██████. Inv. Tillery located an associate, ██████ Inv. Tillery conducted further research of the law enforcement databases for ██████ and found two law enforcement arrests by DPD for prostitution ██████

The IP addresses from the commercial sex advertisements posted in Denver, Colorado from 6/17/2020 to 7/13/2020, were found to belong to T-Mobile and Comcast IP 73.153.23.19. Comcast was served with an Administrative Subpoena. The results showed that IP address 73.153.23.19 was used to post several commercial sex advertisements on skipthegames.com. The Comcast account associated with IP address 73.153.23.19.

Subscriber Name: ROBERT HAWKINS
Service Address: 2300 WALNUT ST UNIT 512
DENVER, CO 802052454
Billing Address: 2300 WALNUT ST
APT 512
DENVER, CO 80205

Inv. Tillery conducted research for Robert HAWKINS at this address and found Robert Earl HAWKINS (DOB 9/5/1979). Inv. Tillery located an FBI case against HAWKINS from 2012 (31E-DN-70178) where he was charged with multiple counts of child sex trafficking. In this case, he was identified by multiple victims as using the moniker "Tadal" and "Tadow." HAWKINS was convicted of Contributing to the Delinquency of a Minor through Arapahoe County courts.

Inv. Tillery followed up with Houston Police to obtain additional details about the initial contact. Inv. Tillery learned that HAWKINS was contacted with a female party identified as ██████. Inv. Tillery located several escort advertisements containing

photographs of ██████████ from 11/9/2020 through 11/28/2020 indicating her being in Los Angeles California, Las Vegas NV, Houston TX and Phoenix AZ.

On 11/16/2020, ██████████ agreed to participate in a Forensic interview at the CEHTTF Office. ██████████ explained that during the summer of 2020 she began hanging out with ██████████. During this time, ██████████ was 13 years old. She met ██████████ through another juvenile friend. ██████████ described ██████████ to be living the “fast life” engaging in drinking and going to parties. ██████████ was unsure of the exact month but thought it to be in the summer of 2020. ██████████ said she received a call from ██████████ that she was coming to pick her up. ██████████ said that ██████████ arrived in a gray or black vehicle with a black bald man with a beard, driving. While she was in the vehicle a bottle of alcohol was being passed to her which she consumed. She was told the black male went by the name “Tadal” (later identified as HAWKINS through ██████████ Snapchat account). ██████████ described HAWKINS as a 30 something, dark skin, Black male, who wore designer clothes, had tattoos and ears pierced. ██████████ was driven to a downtown Denver “penthouse” where HAWKINS was living. ██████████ said the “penthouse” was on the top level and the balcony faced the street. Inside the apartment were two additional females. ██████████ was introduced to a female named ██████████). ██████████ saw the other black female with light skin who did not speak with her. ██████████ believed this female to have worked for HAWKINS in the past as a prostitute but may have arrived on the same day she did.

██████████ stayed at the apartment for three or four days. During that period, she was provided alcohol and marijuana by HAWKINS and ██████████ stated that HAWKINS was a self-admitted “Pimp” who had ██████████ posting escort advertisements on unknown websites. ██████████ described the escort posting process that she observed: the girls sign up for the website, post pictures, write a caption “saying some nasty stuff” and basically meet up with someone at a hotel and do whatever was agreed upon. ██████████ said that HAWKINS would ask the girls if they were signed up for these websites. ██████████ said she was encouraged by HAWKINS and ██████████ to create her own advertisements. HAWKINS and ██████████ instructed ██████████ on the process for posting and then told ██████████ that she was to communicate via text message with any interested party and to make sure they have money. She was told to get the money first, then do what was agreed upon and return and give the money to HAWKINS. ██████████ said that she posted a picture of herself in a black bikini top but then said she did not make an account. ██████████ said that she told HAWKINS she made an account, but really didn’t. ██████████ knew that if she were to have sex with someone, they would be charged \$400 and that having oral sex would not be the same price.

██████████ stated that while she stayed at the apartment, she either slept in HAWKINS’ and ██████████ bedroom or on the couch. ██████████ was not sure where ██████████ slept and that the 28-year-old slept in the living room. ██████████ described that on one particular night, HAWKINS returned to the apartment, and she observed ██████████ performing oral sex on HAWKINS. ██████████ described HAWKINS to be lying on the bed on his back. While ██████████ was performing oral sex, HAWKINS reached over to ██████████ who was lying next to him. HAWKINS inserted his fingers into ██████████ vagina. ██████████ stated this is the only time during her stay that HAWKINS had any sexual contact with her.

At the end of the interview, ██████████ shared her Snapchat account, ██████████ from her cellular phone where she stated she was associated and had communicated with both HAWKINS and ██████████ Snapchat accounts. ██████████ allowed Detectives to view the content between her,

██████████ “Tadal DaP”, and ██████████. The account belonging to ██████████ was under that same name and was assigned username ██████████. The account belonging to “Tadal” was under the name “Tadal DaP” with username “tadaldap”. When Detectives accessed the profile for account “tadaldap”, Detectives observed a recent “story” posted to the account. A Snapchat “story” is a collection of “Snaps”, or media, uploaded by the user, and played back for the viewer in the order the “Snaps” were uploaded. Upon reviewing the “story”, Detectives observed the male in the video to be nearly identical to the law enforcement photographs and DMV photo of Robert HAWKINS. There were also multiple videos of a female with braces who ██████████ identified as ██████████. This female was wearing the same clothing and looked exactly like the female from the account ██████████. Det. Michael observed the conversations start on 6/5/2020 and ended in August of 2020.

Det. Michael later reviewed the saved Snapchat conversation between ██████████ and ██████████ and found a conversation on or after 6/22/2020 where ██████████ discussed their backstory before meeting HAWKINS. ██████████ referred to HAWKINS as “he a real p tho”. Your Affiant knows from her training and experience investigating the sex trafficking of individual that a Pimp is often referred to as a “P” which is short for Pimp. Your Affiant knows individuals who proclaim to be pimps refer to themselves as a “P”. Det. Michel then found Robert HAWKINS’ name in the DPD Database and discovered HAWKINS was listed as a subject in a VICE complaint on 2/18/2020, under case number 2020-500923. The record reflected that Management of the Douglas Apartments, located at 2300 Walnut Street had concerns about Apartment 512. Management reported that the parties in apartment 512 had several people enter and exit the apartment throughout all hours of the day. Management reported that they conducted a routine maintenance check of the apartment and noticed both bedroom doors had deadbolt security locks on them. They also observed several cameras placed throughout the apartment. Management said that a party named Robert HAWKINS always paid the rent with cash or a money order. Det. Matthew Clements, who was assigned to the case, obtained a photograph of Robert HAWKINS, DOB 9/5/1979. Det. Clements showed this photograph to management who positively identified HAWKINS as the person who paid the rent for apartment 512.

On 11/30/2020, Det. Michael authored a search warrant for a cellular phone seized from HAWKINS when he was booked into the Arapahoe County Jail on an outstanding arrest warrant. The cellular phone data searched, and a telephone number was located in the phone contacts for ██████████”. Det. Michael queried the telephone number and located two escort advertisements depicting photographs of ██████████. The advertisement posted on 10/28/2020 was for the Las Angeles, CA area and on 12/1/2020 was for the Denver Colorado area. During the analysis of HAWKINS’ phone extraction, it was discovered that he had a **US Bank** account ending in **5351**, and credit card ██████████

On 12/23/2020, Inv. Tillery authored a search warrant for the following SnapChat Accounts: ██████████
Inv. Tillery received the SnapChat records and located several examples of content that corroborated the events being investigated:

- Conversations between ██████████ were located.
- Conversations between ██████████ and HAWKINS were located.

Videos of ██████████ together.
Videos of ██████ engaged in sexual intercourse.

The communication between HAWKINS and ██████ began on 5/30/2020. From the conversations, it was discovered that HAWKINS was in California when he met ██████ on SnapChat. The conversations revolved around recruitment of ██████ into the commercial sex business. On 6/3/2020 there was evidence that HAWKINS, ██████ and ██████ picked ██████ up near her home. This was learned through a video ██████ while in route to pick her up. On 6/24/2020 there were multiple videos:

- ██████ kissing,
- ██████ on a bed, ██████ vagina and ██████ buttocks.
- ██████ all walking together in a parking lot.
- ██████ riding in a car together- Associated with a message HAWKINS sent asking where y'all at?" "tf y'all didn't say shit.... Okay". ██████ replied, "Baby I told u I was leaving". HAWKINS "I know bur ██████ didn't know she was gone to, wtf..." "Tell her 2 call me now". ██████ responded "I'm the only Bitch out the house making money". HAWKINS disagreed and instructed ██████ multiple times to send her back and send her to 13th and Chambers. (unknown who he was referring too).
- ██████ SnapChat indicated that ██████ and HAWKINS were together at the Douglas apartments.

Robert HAWKINS was arrested on 9/9/2021, in California. Det. Michael continued investigating HAWKINS' activities and obtained additional search warrants for accounts and devices as part of her investigation. She learned through her investigation that ██████ came to Colorado to live when she was nineteen years old. HAWKINS began residing at the Douglas apartments, on 9/1/2019. There was police contact that confirmed ██████ and HAWKINS maintained contact with each other through June 2021. Once HAWKINS was arrested in September 2021, ██████ continued to engage in prostitution through 2/25/2022, when she was arrested during an undercover prostitution sting. Det. Michael also observed ██████ posting numerous escort advertisements the following eight months after her and HAWKINS' arrest by San Francisco Police Department. Both ██████ and HAWKINS were known to travel between California and Texas where ██████ was cited for engaging in prostitution.

HAWKINS was eventually arrested in this investigation, on 11/9/2021, and he is currently awaiting trial for the charges identified at the top of this affidavit. As part of the prosecution phase of this case, Your Affiant is attempting to better understand the financial transactions of HAWKINS as they relate to the criminal offenses he is being charged with. As such, Your Affiant is requesting authority to seize records from this account to further analyze the financial activities that would corroborate the criminal behaviors described above, especially as it relates to the money that was being provided to him by the victims in this case. Through training and experience, Your Affiant is also aware that many offenders involved in human trafficking and pimping have more than one account with their respective financial institutions. Since it was identified that HAWKINS performs his banking at this institution, Your Affiant is also requesting authority to review other accounts HAWKINS holds, as it is significantly common for these offenders to move monies from

one account to another. This is done so in an attempt to avoid detection by law enforcement and measures in place under the Bank Secrecy Act.

Based on the information provided about the suspected and alleged forced commercial sex activities, sex trafficking, pimping and other crimes that HAWKINS has been charged with, Your Affiant is seeking authority to review the financial records and transactions from HAWKINS' accounts. Specifically, Your Affiant needs to be able to review account ownership information for the above-identified accounts, and all transactions that occurred during this period of time to and from HAWKINS and all of the listed victims. A financial analysis will be conducted of the transactions, in conjunction with the concerns, allegations and pending charges. Your Affiant has found in other cases of human trafficking he has investigated that the financial records provide a better understanding of the money that is generated from these suspected crimes, and access to these accounts will allow Your Affiant to perform an analysis of transactions related to the victims' forced labor and confiscated earnings, as well as the ability to corroborate the information provided by the individuals whom law enforcement has previously spoken with.

Based on the aforementioned information, your affiant is requesting a search warrant and court order for the production of the above-described records pursuant to 18 U.S.C. §2703, Crim. P. 41, and C.R.S. §16-3-301, 16-3-301.1, and 19-2.5-205.

The records should be provided to:

Inv. Adam String
201 W Colfax Ave, 8th Floor
Denver, CO 80202
720-913-9150
adam.string@denverda.org


Your affiant has read the above and foregoing application and affidavit, and the statements therein contained are true to the best of his knowledge, information, and belief.

/s/Adam String
Signature of Affiant

Review & Approval

<u>/s/ Lara Mullin</u>	Lara Mullin, Chief DDA Attorney, Reg. No. 38569	April 10, 2023 at 11:02 a.m.
District Attorney – Signature	District Attorney – Printed name & Registration #	Date and Time

Subscribed under oath before me on this 10th day of April, 2023 at 1500
in the City and County of Denver, CO


Signature of Judge

David Blackett

Printed Name of Judge