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| County Court, City and County of Denver, Colorado<br>Lindsey-Flanigan Courthouse, Room 160<br>520 W. Colfax Ave.<br>Denver, CO 80204 |  |
| Plaintiff: The People of the State of Colorado   |  |
| Defendant: <b>William Fredrick Galbreath, Jr. (DOB: 11/22/1985; [REDACTED] Male/Black; 6'03"; 210 pounds; Blk Hair/Brown Eyes</b>    | ▲ COURT USE ONLY ▲                             |
|  | Case Number: 23TM196<br><br>Div: Criminal Ctrm |
| <b>AT LARGE ARREST WARRANT</b>   |  |

THE PEOPLE OF THE STATE OF COLORADO

TO: Any Peace Officer authorized by law to execute arrest warrants:

WHEREAS, the District Attorney for the Second Judicial District, City and County of Denver, State of Colorado has this day filed a Complaint/Information in this Court charging **William Fredrick Galbreath, Jr. (DOB: 11/22/1985; [REDACTED] Male/Black; 6'03"; 210 pounds; Blk Hair/Brown Eyes)** with the crime(s) of: **Human Trafficking – C.R.S. §18-3-503 (F3), Pimping - C.R.S. §18-7-206 (F3), Money Laundering - §18-5-309 (1)(a) (II)(a) (F3) Computer Crime - C.R.S. § 18-5.5-102 (1)(b)(3)(a)(V) (F6).**


AND WHEREAS, the Court has examined the attached affidavit and has satisfied itself that there is probable cause to believe that the above-named offense (s) charged have been committed by the above named person; and

WHEREAS, the District Attorney for this Judicial District has requested that an at large arrest warrant issue for the above named person.

THEREFORE, you are hereby commanded to arrest and bring **William Fredrick Galbreath, Jr.** without unnecessary delay before the nearest available judge of a county or district court.

Bail fixed at \$ 1st Appearance

Date 9/6/23

  
 \_\_\_\_\_  
 Signature of Judge  
 David Blackett  
 \_\_\_\_\_  
 Printed Name of Judge

Original Duly Verified

State of Colorado } ss  
 County of \_\_\_\_\_ }

RETURN OF WARRANT

I hereby certify that I duly executed this warrant as commanded by arresting:  
**Henry Semaj Hamp Smith, DOB: 4/17/1999**

on \_\_\_\_\_, 2023.

\_\_\_\_\_  
Arresting Officer

|   |  |
|---|--|
| County Court, City and County of Denver, Colorado<br>Lindsey-Flanigan Courthouse, Room 160<br>520 W. Colfax Ave.<br>Denver, CO 80204  |  |
| Plaintiff: The People of the State of Colorado<br><br>Defendant:<br>William Fredrick Galbreath, Jr. (DOB: 11/22/1985; SSN#: 521-51-0486; FBI#: 337046LC1; SID #: CO1919764; Male/Black; 6'03"; 210 pounds; Blk Hair/Brown Eyes) | ▲ COURT USE ONLY ▲                             |
|   | Case Number: 23TM196<br><br>Div: Criminal Ctrm |
| SUPPORTING AFFIDAVIT FOR AT LARGE ARREST WARRANT  |  |

**Preamble**

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Your Affiant, Investigator Joseph M. DeAngelo (hereafter referred to in the first person), has been a sworn peace officer for over 29 years. I currently serve in the capacity of a senior criminal investigator for the Second Judicial District – Denver County District Attorney’s Office (Denver DA) in the Human Trafficking Unit (HTU). Previously I was assigned to the Family Violence Unit (FVU) of the Denver DA’s Office. Over 20 years of my tenure has been in the capacity of a criminal investigator which included assignments with the Colorado Attorney General, chief investigator with the 14<sup>th</sup> Judicial District (NW Colorado), detached service with the FBI and county prosecutor/grand jury when employed as a detective with the Fort Wayne, IN Police Department. Additionally, I have two master’s degrees: Psychology – Criminal Investigations, and Human Development from Regis University and Fielding Graduate University, respectively. Furthermore, I have a graduate certificate in Child Sex Offender Behavioral Characteristics from Regis University. Also, I have instructed numerous graduate level courses as an adjunct professor at Regis University for topics generally related to criminal psychology.

The below arrest affidavit narrative describes the material portions of a two-month complex human trafficking investigation and is not necessarily in sequential order as developed through the investigation. This is due to the fact the investigation was multifaceted at every stage and would be difficult to follow if same were presented in the chronological order of investigative actions. Rather, the arrest affidavit narrative is presented in such a way as to aid the Court in understanding the totality of all material evidence in a more organized fashion. Further, in this arrest affidavit I have omitted many investigative actions which did not or yet have not produced material evidence (i.e., pending compliance on search warrants and two search warrants which did not produce material evidence, etc.). However, the numerous search warrant/affidavit attachments in this arrest affidavit, for which the probable cause for same are incorporated into this arrest affidavit by reference, depict the investigation in a more

25 chronological and complete fashion to include the outstanding warrants and the two warrants which did not  
26 produce evidence.

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### Statement of Probable Cause

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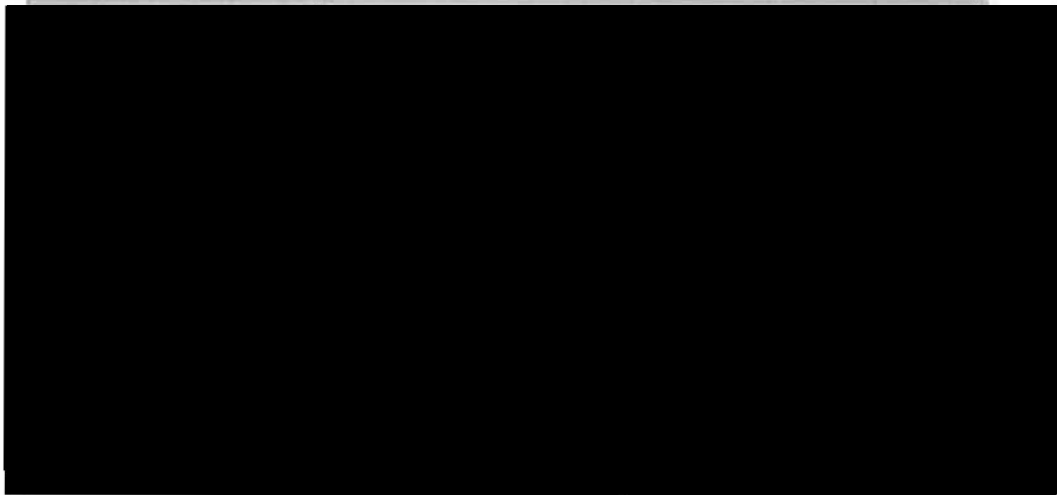
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On 07/06/2023, Denver DA FVU Investigator Hartness, contacted me and advised that a victim, [REDACTED]  
[REDACTED] in one of my previous FVU cases (case currently assigned to  
Investigator Hartness), was alleging that she [REDACTED] was additionally a victim of human trafficking.  
Investigator Hartness requested that I meet with her and [REDACTED] on 07/07/2023, at the [REDACTED]  
to which I agreed (See below DMV Dossier of [REDACTED]).

### Colorado Driver's License



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On 07/07/2023, Denver DA Victim Advocate (VA) Ms. Dulcelina Gamiao and I picked [REDACTED] up at a  
temporary housing location where she was staying. [REDACTED] was fully packed, and we placed all her personal  
items in my company vehicle. We then drove to the [REDACTED] where we were met by Investigator  
Hartness and a couple hours later by Denver DA HTU Investigator Adam String.

We interviewed [REDACTED] in a private room. The interview was audio recorded but interrupted numerous times  
due to VA Gamiao securing temporary housing for [REDACTED] which required [REDACTED] to speak at different  
times with outside agencies. As such, there are several audio recordings of the interview due to the fact we had  
to take breaks for [REDACTED] to address her housing issue. Also, during the interview process [REDACTED] provided  
me with both verbal and written consent for Investigator String to download her iPhone, which Investigator String  
did.

Since that initial interview I, along with Investigator String, Senior Deputy District Attorney (DDA) Ashley  
Morgan with the HTU and other VAs have met with [REDACTED] On two occasions (07/11/2023 and 07/12/2023),  
[REDACTED] accompanied me and others (07/11/23 – Investigator Hartness and DDA Morgan; 07/12/23  
Investigator String) in my or Investigator String's company vehicle and directed us to locations material to this

54 investigation. On both of those days, I conducted recorded follow-up interviews with [REDACTED] I had numerous  
55 additional text message exchanges with [REDACTED] related to this case and an additional recorded phone interview  
56 with [REDACTED] on 07/14/2023. From the totality of all the recorded interviews, text conversations and site  
57 locations with [REDACTED] advised the following in summary in response to questioning or through  
58 volunteering information as applicable to this investigation, not necessarily in the order presented below:<sup>1</sup>  
59

60 **Initiation into the Commercial Sex Industry**

61  
62 After [REDACTED] was released from Arapahoe County Jail (served time for traffic related offenses), [REDACTED]  
63 was living with her boyfriend by the name of [REDACTED] The housing situation was not working out for [REDACTED]  
64 and in late January 2023, she decided to look for another place to live. However, [REDACTED] income and  
65 financial resources were very limited. All she had was \$400.00 in cash.  
66

67 **Introduction to [REDACTED] - Commercial Sex Worker**

68  
69 [REDACTED] began looking online through a website called *roommates.com* and located a female who went by the  
70 name of [REDACTED] however, [REDACTED] later found out her real name was most likely [REDACTED] but did not know her  
71 last name (I later identified [REDACTED] as [REDACTED] [see below DMV dossier] – referred to as [REDACTED]  
72 throughout this affidavit).<sup>2</sup>  
73

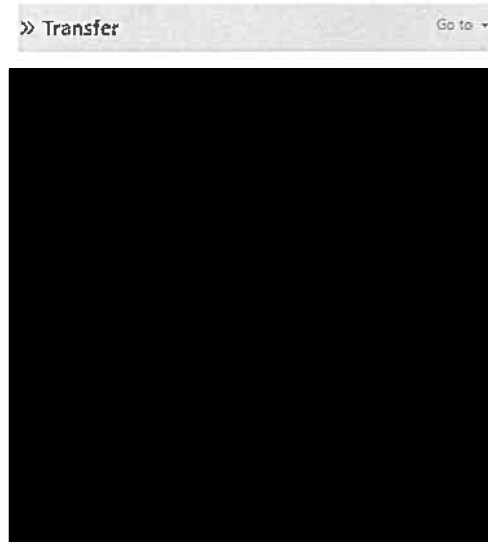


74  
75  
76 [REDACTED] and [REDACTED] communicated online where they discussed [REDACTED] s situation to include [REDACTED]  
77 [REDACTED] limited financial resources. [REDACTED] and [REDACTED] then met in-person at the IHOP restaurant  
78 located at [REDACTED] Denver, CO.

<sup>1</sup> This summation includes the last recollection of the [REDACTED] For example, in the initial interview [REDACTED] explained she met her pimp at the [REDACTED] in Denver. However, upon reflection in a later interview she recalled that their initial meeting was at [REDACTED] restaurant on Larimer St in Denver. Hence, for the purposes of this affidavit I noted [REDACTED] as their first meeting.

<sup>2</sup> I later identified [REDACTED] through the commercial sex ads and her lease at the apartment. [REDACTED] reviewed and confirmed the sex ads in this affidavit were those of her [REDACTED] (detailed later in the affidavit).

79 [REDACTED] was dropped off at the [REDACTED] by an adult male who she initially thought was  
80 [REDACTED] boyfriend and later learned to be “Chris,” who is discussed in the next section (I later identified  
81 Chris as the Defendant in this case *Mr. William Galbreath* – hereafter referred to as Mr. Galbreath). [REDACTED]  
82 agreed to let [REDACTED] live in the apartment with her for the \$400.00 cash (below is a screenshot taken from the  
83 cell phone dump of [REDACTED] phone. I believe this is the transaction [REDACTED] is referring to regarding the  
84 money exchange with [REDACTED] for rent (Venmo cash transfer).<sup>3</sup>  
85



86  
87  
88 The apartment was in Arapahoe County near the justice center. The tentative agreement was that [REDACTED]  
89 would get a job and start paying [REDACTED] for rent once she started earning income. [REDACTED] was under  
90 the impression from talking with [REDACTED] had been living at the apartment since  
91 November 2022.

92  
93 [REDACTED] was initially under the impression that the apartment was leased by Mr. Galbreath. [REDACTED]  
94 explained to [REDACTED] that Mr. Galbreath could help [REDACTED] make money so she could pay rent and all her  
95 life expenses. [REDACTED] was interested in meeting Mr. Galbreath for that purpose. [REDACTED] arranged for  
96 [REDACTED] to meet with Mr. Galbreath in-person the following day or two after they ([REDACTED]  
97 [REDACTED]) met.

98  
99 ***Mr. Galbreath (Pimp) – Initial Meeting***

100  
101 The following day or two later, [REDACTED] met with Mr. Galbreath at the *Snooze* restaurant, 2262 Larimer St,  
102 Denver, CO 80205. [REDACTED] later learned that Chris was most likely not his real name; however, [REDACTED]

<sup>3</sup> I located this transaction in the cell phone dump and later confirmed the transaction through obtaining Ms. Stelpflug’s Venmo account via a search warrant. I have not been able to speak with Ms. Garcia to confirm if this is the transaction she was referring to. However, this is the only such transaction I found on her cell phone and the Venmo account. Further, the transaction is in close time proximity to when Victim indicated the events occurred; albeit for \$300.00. Hence, it is highly likely this is transaction related to the roommate deal.

103 never did learn his real name. In that meeting Mr. Galbreath explained to ██████████ that the work he was offering  
104 ██████████ was in the commercial sex industry (prostitution). Mr. Galbreath explained that ██████████ could  
105 make a great deal of money and that he would help ██████████ with her credit and help her invest for future  
106 savings. As part of the enticement process, Mr. Galbreath showed ██████████ pictures of “wads of cash.” Mr.  
107 Galbreath explained his role in the operation was to get dates for ██████████ agreed to the deal after  
108 thinking on it for a day or two. ██████████ did not have initial concerns about the job because she had worked as  
109 a commercial sex worker when she was 21 years of age. However, at that time she posted online commercial sex  
110 ads for herself, did not have a pimp and only worked in the industry for a short time.

111  
112 ██████████ *Moves in with ██████████ - Late January or Early February 2023*

113  
114 ██████████ moved into the residence with ██████████ in late January or early February of 2023. Initially, they  
115 were in a one-bedroom apartment and ██████████ slept on the couch. The first or second day that the ██████████  
116 moved in, Mr. Galbreath brought a third woman to the apartment that was going to work for Mr. Galbreath. The  
117 new third woman was withdrawing from fentanyl and was throwing up on the couch incessantly. Mr. Galbreath  
118 moved the new woman out shortly thereafter. Mr. Galbreath indicated he took the woman to some type of rehab  
119 clinic, but ██████████ has no idea if that actually occurred.

120  
121 Mr. Galbreath brought in another Hispanic female to the one-bedroom apartment. The Hispanic female stayed  
122 only for a few days and serviced clients during her stay. The Hispanic female moved out once she obtained  
123 government housing. ██████████ did not know the Hispanic female’s name. ██████████ described the Hispanic  
124 female as having long straight black hair, 5’01”, average to curvy build, early 30s.

125  
126 On 02/24/2023, they (██████████) moved to a three-bedroom apartment in the same complex.  
127 ██████████ remembers the exact date due to the fact it was her birthday. The apartment complex was named  
128 ██████████ Englewood, CO 80112. The first apartment was ██████████  
129 ██████████. The second apartment was ██████████. The move was facilitated by Mr.  
130 Galbreath in order to provide ██████████ her own separate room in order to service clients.

131  
132 ***Mr. Galbreath Facilitates Commercial Sex Operation***

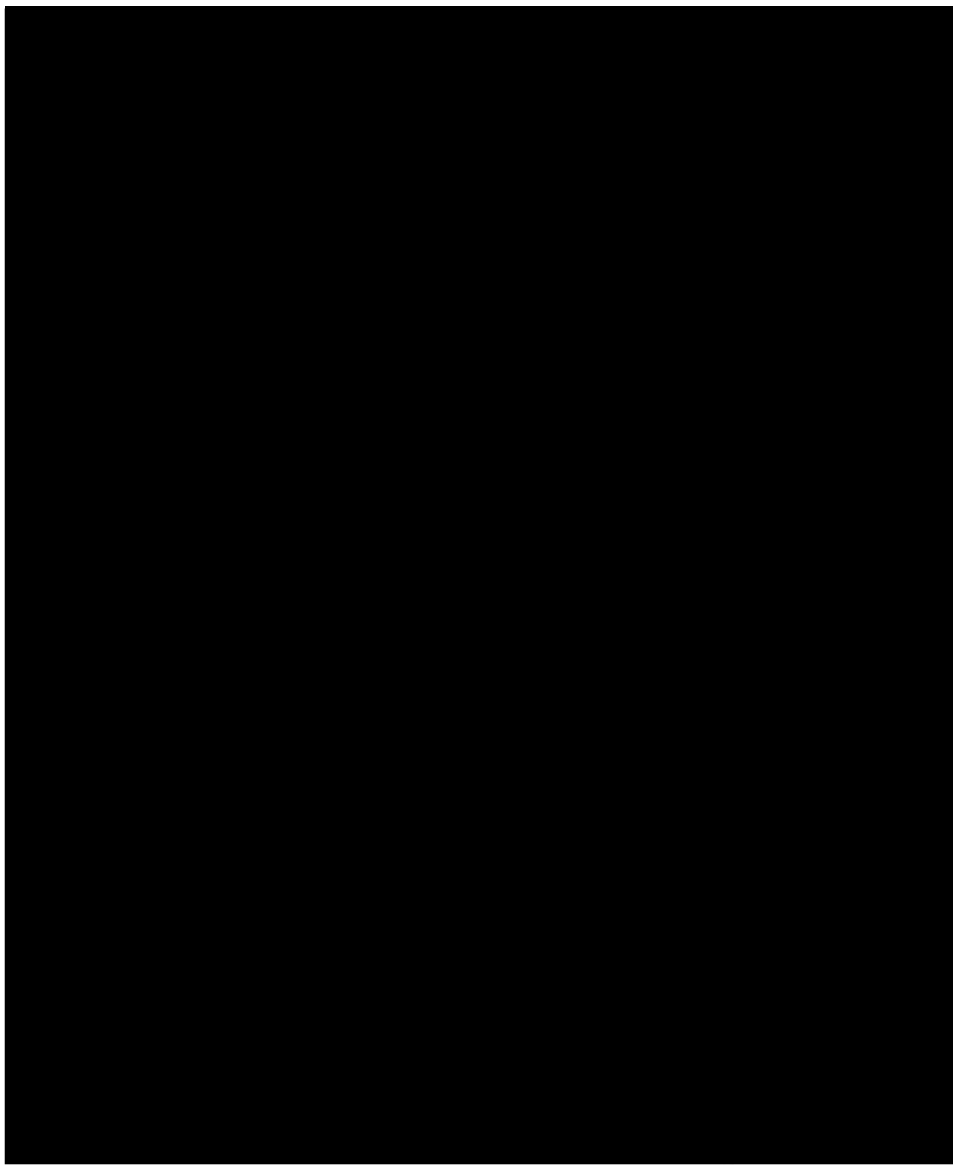
133  
134 **Banking**

135  
136 Mr. Galbreath took ██████████ to Bank of America to open a bank account for her. Mr. Galbreath did most of the  
137 talking with the bank representative. Mr. Galbreath had access to the account (sign-in passwords, pin number,  
138 etc.) and occasionally sent money via cash apps to the account (screenshots of account below provided by ██████████  
139 ██████████ or located on her cellphone from the data dump).

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<sup>4</sup> ██████████ took Investigators to these locations and identified the individual apartments. I met with the leasing agent manager who provided me with the leases for the residence.

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144 When [REDACTED] needed money, Mr. Galbreath would then wire funds from the Bank of America account to [REDACTED]  
145 [REDACTED] bank account. The [REDACTED] account was a prior established account that was in [REDACTED] name.  
146 [REDACTED] established the [REDACTED] account in 2014 at the [REDACTED] Denver, CO 80206.  
147 [REDACTED] has continued to bank at that branch and other branches throughout the Denver metro area since  
148 opening the account.

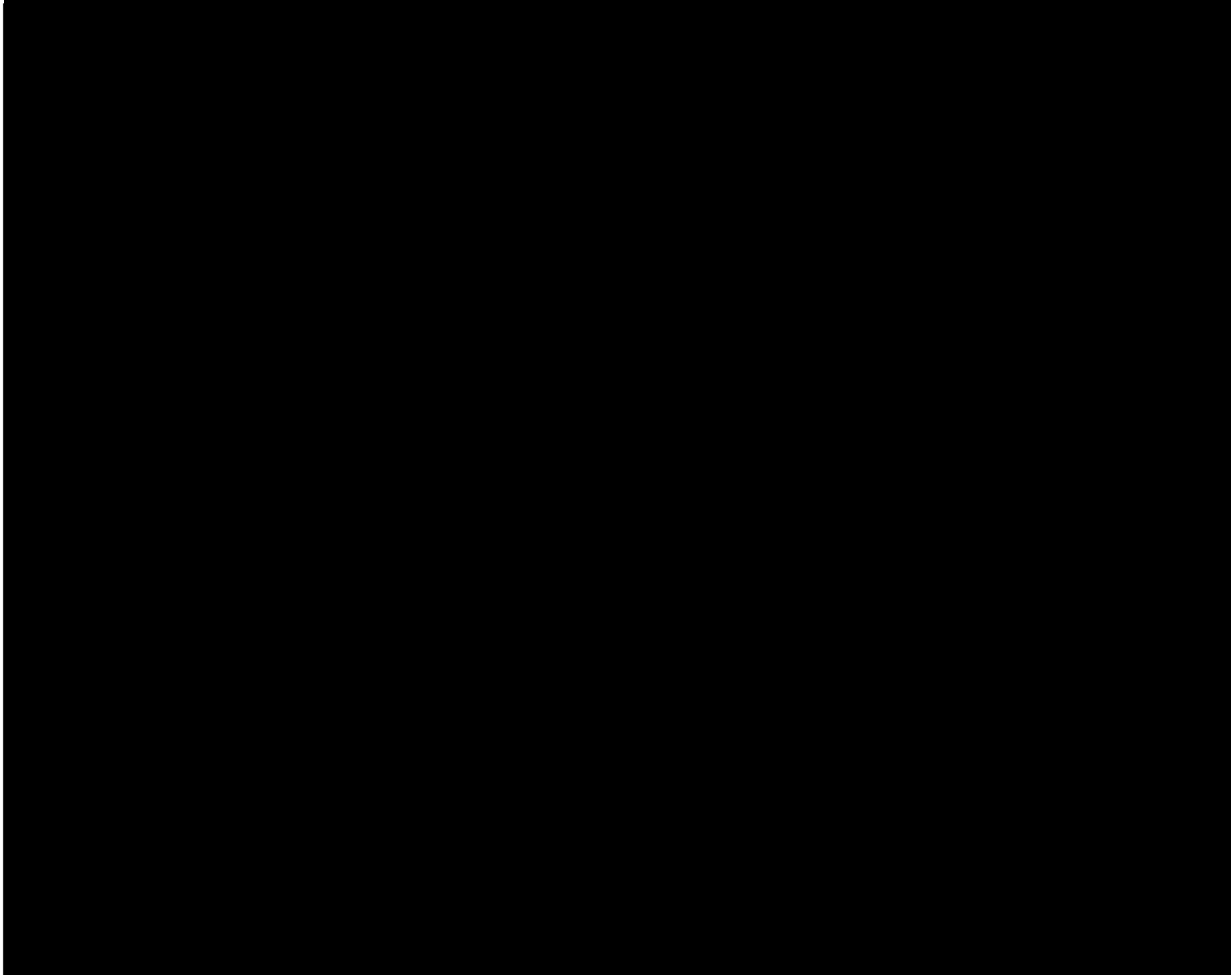
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*Posting of Sex Ads*

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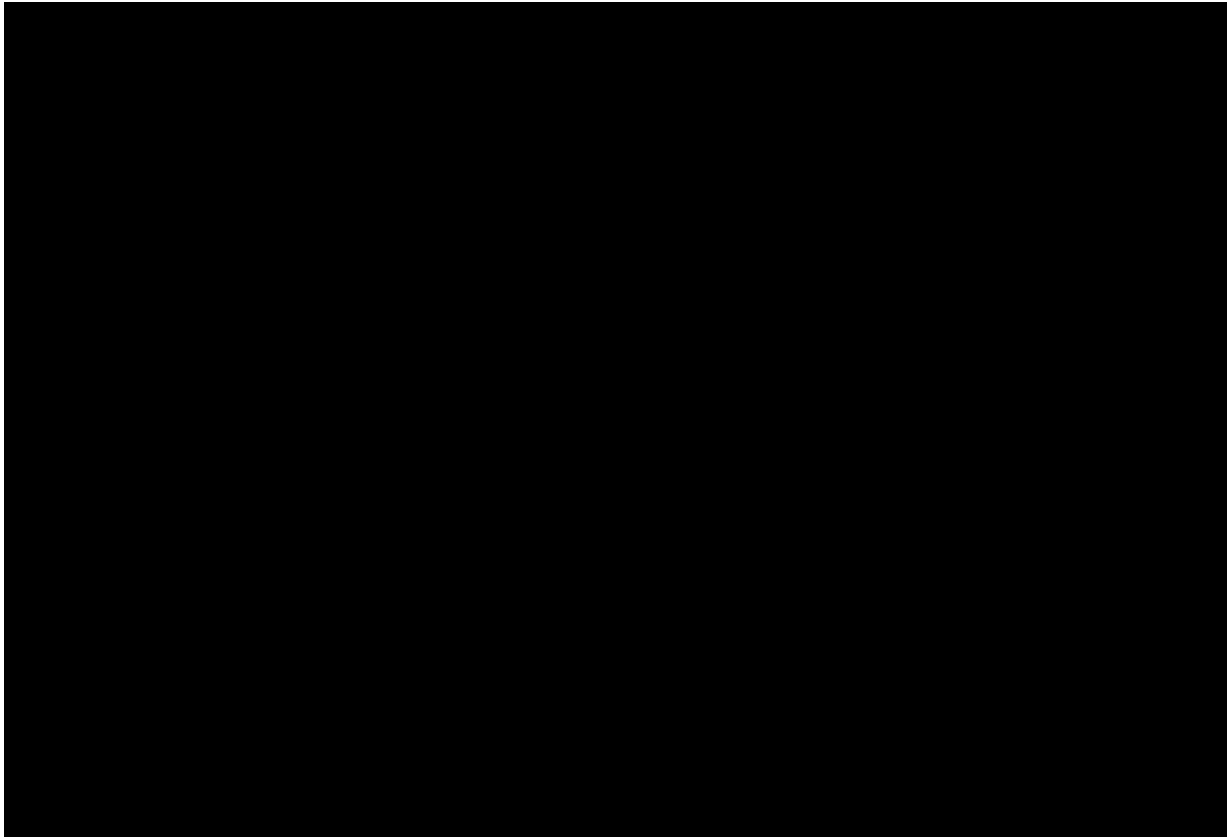
As part of the initial process, Mr. Galbreath had [REDACTED] take numerous seductively posed photographs of herself and send them to Mr. Galbreath. Mr. Galbreath also had [REDACTED] send a picture where she was holding

154 her ID next to her face. This was so Mr. Galbreath could start an account on *P411* using [redacted] credentials  
155 (ID was required for that site). Mr. Galbreath in turn posted the pictures to sites known for commercial sex  
156 advertisements such as *P411*, *theotherboard.com* and *privatedelights.com*.<sup>5</sup> [redacted] reviewed some of the  
157 postings at Mr. Galbreath's request. However, [redacted] did not do any of the actual postings. [redacted]  
158 identified the below advertisements as belonging to [redacted] respectively (as posted by Mr.  
159 Galbreath).  
160



161  
162

<sup>5</sup> Through my experience and training, I am familiar with these sites (*P411*, *theotherboard.com* and *privatedelights.com*). They are sites where the primary purpose is for commercial sex workers to post ads and connect with potential clients. \_\_\_\_\_



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***Mr. Galbreath's Contact with Clients***

On the advertisements, Mr. Galbreath used his phone number for the prospective clients to contact him [REDACTED]. Further, the email addresses listed in the ads were not created by [REDACTED]. To keep his identity concealed from the clients, Mr. Galbreath would not answer the phone calls. Rather, he would only text the clients back if they called, and he pretended to be one of the female sex workers. Mr. Galbreath would require the clients to send him a picture of themselves with their photo ID to ensure the client was not law enforcement.

***Mr. Galbreath Transfers Clients to [REDACTED] (Cell Communications & Transportation)***

**Cell Communications with [REDACTED]**

Once Mr. Galbreath negotiated the commercial sex transaction with the client, Mr. Galbreath would then either call or send text messages to [REDACTED] when the client was going to arrive at the apartment. Mr. Galbreath would further explain what type of service or fetish the client wanted to experience (i.e., fellatio,

181 foot fetish, MSOG, GFE, DATY, etc.)<sup>6</sup> and the amount of time to spend with the client. The general rates for time  
182 of service: half hour - \$250.00, hour - \$350.00, 2 hours - \$600.00. [REDACTED] did all services she was requested  
183 to perform except anal intercourse. [REDACTED] serviced three to seven clients a day.

184  
185 The number Mr. Galbreath used to contact [REDACTED] cell phone number was  
186 (and still is) [REDACTED] cell carrier was (and still is) [REDACTED]

187  
188 Mr. Galbreath would direct [REDACTED] to keep the apartment door slightly ajar for the client.  
189 Initially when they were in the one-bedroom apartment whoever was with the client would take the bedroom in  
190 which to sexually engage with the client and the other would hide inside the apartment. However, when they  
191 moved to the three-bedroom apartment they had their own private rooms. On occasions they both serviced the  
192 same client at the same time. [REDACTED] worked all day, often until late in the evening.

### 193 194 **Transportation to Outcalls**

195  
196 On outcall visits (where [REDACTED] went to the client's location) they typically would Uber  
197 or Lyft to the location and sometimes did not get home until the early morning hours. However, on some occasions  
198 Mr. Galbreath drove [REDACTED] to the outcall. Mr. Galbreath drove two newer model SUVs  
199 (one white, one dark – unknown plates). Many of the outcalls were to locations within the city of Denver. [REDACTED]  
200 [REDACTED] recalled specifically having an outcall to the [REDACTED]  
201 [REDACTED]

### 202 203 **Payment for Service/Collection of Funds**

204  
205 Typically, the client paid in cash. [REDACTED] would take the money and secure it in the  
206 apartment. They would then turn the money over to Mr. Galbreath when he visited, which was typically twice a  
207 day. [REDACTED] turned over to Mr. Galbreath from \$1000.00 to \$2,500.00 a day. The cash app  
208 payments from the clients went directly to Mr. Galbreath.

### 209 210 **Mr. Galbreath – Payments to [REDACTED] for Commercial Sex Work**

211  
212 As stated previously under the heading of Bank accounts, Mr. Galbreath paid [REDACTED] typically via money  
213 transfers through apps such as Venmo and Zelle by initially placing funds in [REDACTED] Bank of America  
214 account and then transferring to her established [REDACTED] account. On a few occasions Mr. Galbreath would take  
215 [REDACTED] and request [REDACTED] ATM card and PIN number. Mr. Galbreath would  
216 then enter cash directly into [REDACTED] account through the ATM. However, the pay was sporadic and minimal  
217 and ranged from \$300.00 to \$500.00 a month. [REDACTED] believes the last time Mr. Galbreath entered cash into  
218 her account via an ATM was the middle of May 2023. Mr. Galbreath justified the minimal pay by telling [REDACTED]  
219 [REDACTED] she owed him for the rent ([REDACTED] paid for her own groceries from SNAP benefits assigned to her).

<sup>6</sup> MSOG is an acronym used in the industry which means multiple shots on goal (the client ejaculates more than one time in a single session). GFE is an acronym used in the industry which means girlfriend experience (sex worker pretends client is her boyfriend). DATY is an acronym used in the industry which means dining at the Y (client performs cunnilingus on sex worker).

<sup>7</sup> This is the same number Mr. Galbreath used for [REDACTED] commercial sex ads.

220 One time, [REDACTED] wanted to go shopping with her mom and daughter (mom has/had custody of [REDACTED]  
221 daughter). [REDACTED] asked for money and Mr. Galbreath sent her \$75.00 via an app. [REDACTED] was very hurt  
222 by what she considered such a small amount of money, considering she rarely asked for money. Further, the  
223 \$75.00 was such a small amount in context with the many thousands of dollars she generated in revenue for Mr.  
224 Galbreath.

225

### 226 *Mr. Galbreath Conceals Identity*

227

#### 228 **Purchased Marijuana**

229

230 Mr. Galbreath went to great lengths to keep his identity hidden from [REDACTED] never saw Mr.  
231 Galbreath's driver's license nor any other type of identification on him. One time they went to purchase marijuana  
232 for [REDACTED] [REDACTED] could not  
233 remember the exact date that she and Mr. Galbreath went to [REDACTED] but believed it was some time  
234 in February or March of 2023.

235

236 During this visit to [REDACTED] showed her identification upon entry to the dispensary.  
237 Mr. Galbreath intentionally followed behind [REDACTED] and went to lengths to keep [REDACTED] from seeing his  
238 license when he was required to present ID. Mr. Galbreath purchased the marijuana for [REDACTED] so she could  
239 "chill," which allowed her to sleep and in turn work better. Mr. Galbreath did not purchase any of the marijuana  
240 for himself.<sup>8</sup>

241

#### 242 **Mr. Galbreath Deletes [REDACTED] Cell Activity/Strict Time Management**

243

244 Mr. Galbreath went to lengths to limit his electronic trail by requiring [REDACTED] to give him her phone with the  
245 password. With [REDACTED] phone, Mr. Galbreath would then delete all the texts and calls he had with [REDACTED]  
246 [REDACTED] Mr. Galbreath further scolded [REDACTED] when she asked questions about the operation. Additionally,  
247 Mr. Galbreath made [REDACTED] account for all their time and keep him apprised as to what the  
248 other was doing. As part of [REDACTED] time management, Mr. Galbreath contacted [REDACTED]  
249 [REDACTED] early each morning and required that they go to the apartment complex gym to keep fit  
250 and further required them to be showered and made up each morning by a certain time.

251

#### 252 *Description of Mr. Galbreath/Potential Jail History/Sexual Encounters*

253

254 [REDACTED] described Mr. Galbreath as: Half white/half black, approximately 6'01", approximately 35 years of  
255 age, muscular upper body with skinny legs, approximately 180 pounds, afro hair texture "waves," "handsome."  
256 Mr. Galbreath dressed very nice or "classy" with no noticeable scars, marks, or tattoos. Mr. Galbreath explained  
257 to [REDACTED] he intentionally did not wear jewelry or extravagant clothing to avoid the stereotypical image of a  
258 pimp. Mr. Galbreath always had three to four cell phones with him.

259

<sup>8</sup> I obtained a search warrant for [REDACTED] for video surveillance and identification of client related to the marijuana purchase. The search warrant was based upon the store manager's representation to me same would be available. However, upon serving the warrant the owner of [REDACTED] advised that no such data was available.

260 Mr. Galbreath once disclosed to ██████████ that he did a little bit of jail time in Arapahoe County jail. Beyond  
261 that, ██████████ knew very little about Mr. Galbreath's life. However, they did have sex a few times at the  
262 apartment. There was no quid pro quo for the sexual encounters, ██████████ found Mr. Galbreath attractive and  
263 willingly participated in the sexual encounters.

264  
265 **██████████ Breaks from Mr. Galbreath**

266  
267 From early February 2023 to early July 2023, ██████████ left the operation on a few occasions to work on her  
268 own out of hotels in Lakewood (██████████) and at a friend's house. This was due to the fact Mr.  
269 Galbreath had gotten mad at ██████████ for various reasons (i.e., Mr. Galbreath went through her phone and  
270 discovered she was saving client's numbers, Mr. Galbreath discovered ██████████ kept some of the cash payment  
271 for herself, Mr. Galbreath discovered ██████████ became intoxicated, etc.) and would not send her clients or  
272 provide her with marijuana as punishment. ██████████ also took a break at the end of May for a week to visit her  
273 son in Texas. However, ██████████ solo work periods were very short, and she returned to working for Mr.  
274 Galbreath.

275  
276 In the first week of July, ██████████ and ██████████ had to move from the apartment to a hotel. ██████████ is  
277 unsure why they had to leave but she was generally under the impression that the lease was up, or they were being  
278 evicted because the neighbors were complaining about the activity at their apartment. ██████████  
279 ██████████ did not stay with her. However, ██████████  
280 ██████████ was under the impression that the room was under ██████████ was uncertain.

281  
282 After being at the ██████████ for a short period of time, ██████████ asked Mr. Galbreath to be relocated to a better  
283 hotel ██████████ such as the Marriot. ██████████ felt the area was unsafe and the  
284 accommodations were less than optimal. Mr. Galbreath refused the request advising that the ██████████ trains their  
285 employees to spot sex workers.

286  
287 At that point ██████████ was tired of the lifestyle and demeaning nature of the work and she obtained a ride to a  
288 friend's house (the friend's house I originally picked her up at). It was at that time Investigator Hartness located  
289 ██████████ and this entire investigative process related to this case was started.

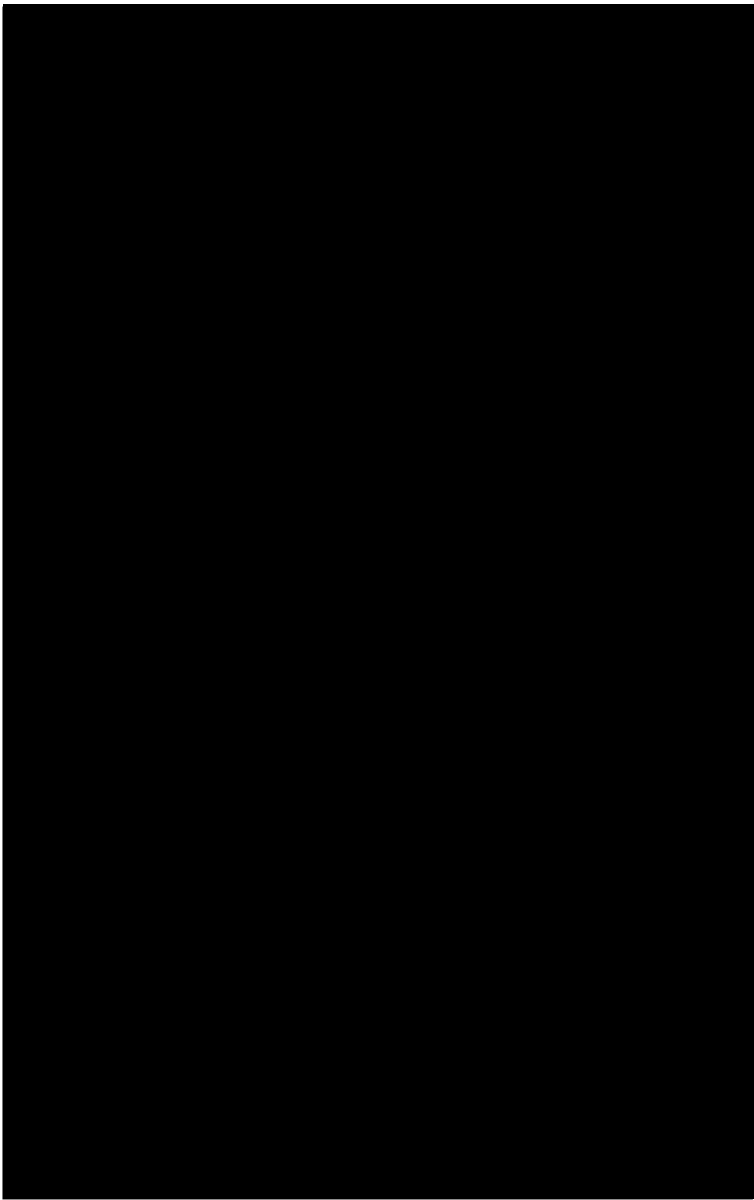
290  
291 **Follow-up Investigation of ██████████ Statements ██████████**

292  
293 ██████████  
294  
295 On 07/11/2023, ██████████ directed me and other DA investigators/DDAs to the apartment complex described  
296 above, ██████████. While on scene I spoke with the apartment manager, ██████████. I  
297 explained to ██████████ the general nature of my investigation. ██████████ confirmed that ██████████ was  
298 the lessee for the above-described unit (this is how I first confirmed the identity of ██████████  
299 ██████████ had been a lessee at the complex since December 2022. ██████████ advised that ██████████ was  
300 11 days late on rent and ██████████ was planning on calling ██████████ to address the situation. I asked Ms.  
301 ██████████ if she could call at that time and let me listen to the conversation, to which she agreed. ██████████

302 called [REDACTED] answered and advised [REDACTED] that she ([REDACTED])  
303 would pay the rent later in the day when she got back to her "hotel" room.  
304

305 I later spoke with Ms. Norman via email. [REDACTED] advised that an unknown male went to the leasing office  
306 on 07/12/2023 and paid the rent for [REDACTED] (later discovered to be Mr. Galbreath).  
307

308 On 07/19/2023, at approximately 1530 hours, I again met in-person with [REDACTED] advised that  
309 [REDACTED] the leasing specialist for Centennial East Apartments, was the individual who took the  
310 money orders from the unknown male (Mr. Galbreath). [REDACTED] provided me with a copy of the money  
311 orders (screenshot below).  
312



313

314

315 Interview of [REDACTED]  
316

317 I then conducted a recorded interview with [REDACTED] confirmed that she received the money  
318 orders the day I was initially on scene or the day after. [REDACTED] does not remember the time of day but is  
319 certain it was before 1600 hours. [REDACTED] described the individual who provided her the money orders as a  
320 mixed-race light skinned male/black approximately 6'00," approximately 30 years old thin build. She did not  
321 recall what he was wearing.<sup>9</sup>  
322

323 Also, [REDACTED] advised that [REDACTED] had been into the leasing office earlier in the week asking to use  
324 the office phone. [REDACTED] that leasing staff of Centennial East Apartments could not allow  
325 tenants to use the office phones. [REDACTED] then departed.  
326

327 **Western Union Money Order**  
328

329 I ran the above money orders through a vetted database and determined that the routing numbers were associated  
330 with a Wells Fargo money order. On 07/20/2023, at 1310 hours, I met in-person with Wells Fargo Branch  
331 Manager [REDACTED] I showed [REDACTED] the above money orders and questioned her about same.  
332 [REDACTED] advised that although the money orders may have been generated at Wells Fargo, she knew with  
333 100% certainty (based upon dealing with such money orders on a routine basis) the money orders were Western  
334 Union money orders. Further, in order to track same (determine the point of origin), I would need to go through  
335 Western Union. I later confirmed this through Wells Fargo security/fraud investigators.  
336

337 *Tracking of Money Orders – Western Union and Safeway*  
338

339 In an effort to track the money orders, I made email contact with [REDACTED] an asset protection  
340 investigator with Western Union. [REDACTED] and his associates were able to determine that: (cited verbatim  
341 from the email response):  
342

343 ... The money orders were purchased at the location below

344 Thanks

345  
346 SAFEWAY #0008  
347 7375 ARAPAHOE ROAD  
348 CENTENNIAL CO ...  
349

350 In a follow-up email [REDACTED] colleague advised that the transaction occurred on: "7.12.2023 AT 9:38  
351 AM."  
352

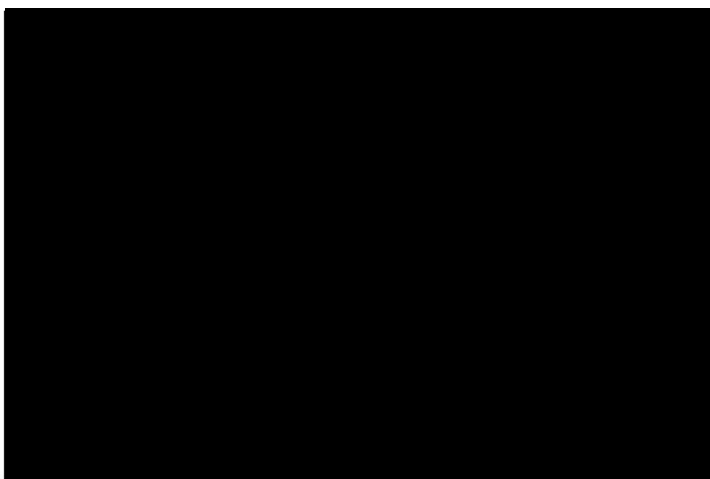
353 On 07/31/2023, in the afternoon hours, I met in-person with [REDACTED] the Safeway store manager for  
354 the above Safeway. After I advised [REDACTED] of the situation, he contacted Safeway Asset Protection Manager

<sup>9</sup> I obtained a search warrant for [REDACTED] for the video surveillance when Mr. Galbreath dropped off the money orders at the leasing office. The IT staff of [REDACTED] confirmed they had the surveillance but did not have the aptitude to preserve same and eventually the recording was recorded over prior to same being preserved.

355 [REDACTED] would have the security footage preserved  
356 for that general timeframe and that, in order for [REDACTED] to provide me with same, I would need to provide  
357 [REDACTED] with a search warrant.

358  
359 *Search Warrant Safeway Video Surveillance*

360  
361 Based upon all the above, I obtained a search warrant for the described surveillance video from Safeway. The  
362 probable cause for that search warrant is incorporated into this arrest affidavit by reference and attached  
363 (Attachment #1 – Search Warrant/Affidavit Safeway Video Surveillance). Safeway security personnel complied  
364 and provided me with the below screenshot of the video which depicted the individual who made the purchase of  
365 the above-described money orders.



367  
368  
369 *Search Warrant (Gmail - Google)*

370  
371 Based upon all the above information within the screenshots of the commercial sex ads purportedly posted by  
372 Mr. Galbreath (pages 7 and 8 of this affidavit), I obtained a search warrant for the Gmail (Google) accounts  
373 [REDACTED] and [REDACTED]. The probable cause for the Gmail (Google)  
374 search warrant are incorporated into this arrest affidavit by reference and attached (Attachment #2 – Search  
375 Warrant/Affidavit Google email accounts).

376  
377 *Google Email*

378  
379 On 08/02/2023, Google complied with the search warrant via the Google law enforcement portal. I reviewed  
380 many of the emails and, consistent with the statements of [REDACTED] statement  
381 detailed later in the affidavit), the contents of the emails were almost exclusively, directly, or indirectly, related  
382 to the commercial sex trade. Numerous commercial sex transactions were negotiated throughout the Denver metro  
383 area for in-calls and outcalls (to include outcalls within the City and County of Denver).

384

385 I located a transaction from the below sex buyer, [REDACTED] I identified [REDACTED] within the  
386 email content as he provided his LinkedIn account as his ID for the transaction.  
387

Colorado Driver's License

388  
389  
390 Within the email exchanges between [REDACTED], and at that point presumably Mr. Galbreath posing as if he  
391 were [REDACTED] Mr. Galbreath requested payment upfront via *Apple Pay* to phone number [REDACTED]  
392 [REDACTED] The conversation is enclosed in the below screenshots (Mr. Galbreath and [REDACTED] were sending  
393 screenshots to each other within the email exchanges to document payment):  
394

395  
396

397 **Phone Interview** [REDACTED]

398  
399 I made numerous attempts to contact [REDACTED] for a two-week plus period without success (emails, phone  
400 messages, texts, stopping at his place of employment, etc.). On Saturday, 08/19/2023, in the a.m. hours, [REDACTED]  
401 [REDACTED] called me. [REDACTED] advised that he had just now received all the messages due to the fact he had  
402 been in an inpatient sex addiction clinic in the mountains for the previous two weeks and his phone was taken  
403 away from him for the entire time, which was part of the treatment. [REDACTED] was distraught by the nature of  
404 my investigation but, as he explained to me, coming clean about his past was part of his rehabilitation. As such,  
405 [REDACTED] was cooperative with me. We agreed to speak the following day for a recorded phone interview.  
406

407 On Sunday 08/20/2023, at approximately 1330 hours, I had a recorded interview with [REDACTED] I sent him  
408 the above screenshots via email during the phone interview. [REDACTED] reviewed same and confirmed that all  
409 the above screenshots were conversations he had with who he thought was [REDACTED]  
410 [REDACTED] additionally explained that he had one additional commercial sex transaction/encounter with what he  
411 thought was [REDACTED] on 03/15/2023. Payment was made via Venmo. [REDACTED] username  
412 with Venmo was/is: [REDACTED] sent me a screenshot of the transaction (see below  
413 screenshot).  
414



415  
416  
417 [REDACTED] added that at the time [REDACTED] was in an apartment in Arapahoe County area by  
418 the justice center and she had a female roommate. [REDACTED] did not see the female roommate.  
419

420 **Search Warrant Apple Pay** [REDACTED]

421  
422 As detailed in the previous section, [REDACTED] obtained payment for commercial sex transactions via Apple  
423 Pay with the cell phone number: [REDACTED] I am personally aware through my law enforcement training and  
424 experience that legitimate financial institutions such as Apple Pay require customers to provide some type of

425 identification when creating an Apple Pay account. Hence, I obtained a search warrant to Apple Pay for the above  
426 account. The probable cause for the Apple Pay search warrant is incorporated within this arrest affidavit by  
427 reference and attached (Attachment #3 – Search Warrant/Affidavit Apple Pay)

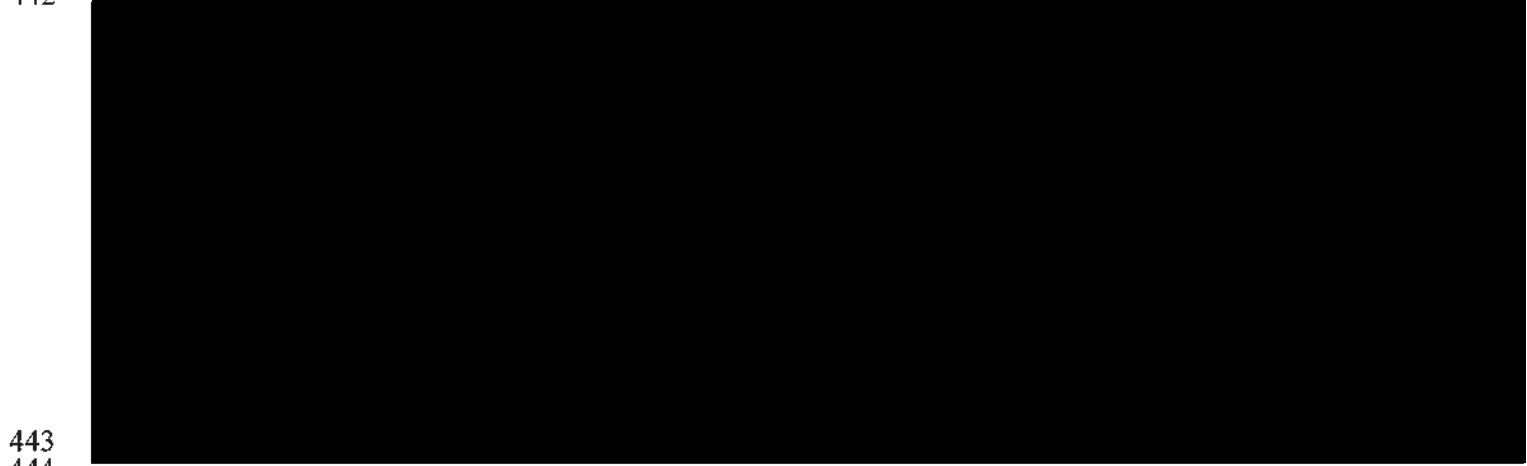
428  
429 *Return on Search Warrants – Apple Pay (Identification of Chris)*

430  
431 **Apple Pay and Chris' Identity (Mr. Galbreath)**

432  
433 On 08/08/2023, I received the return from Apple Pay. The account was registered to a juvenile by the name of  
434 [REDACTED]. The transaction involving [REDACTED] was included in the spreadsheet  
435 of transactions as previously discussed in this affidavit on pages 13-14 (see below screenshot).  
436



437  
438  
439 [REDACTED] had received/sent Apple Pay cash on several occasions to/from a William Galbreath. The transaction  
440 spreadsheet indicated that [REDACTED] and/or William Galbreath have an account with Navy Federal  
441 credit union (see below screenshot of several such transactions).  
442



443  
444  
445 I did an extensive search for those two names on various law enforcement databases and discovered that a William  
446 Galbreath (DOB: 11/22/1985), who has a son by the name of [REDACTED] is currently on probation in  
447 Denver County, Colorado for a felony conviction of pimping and domestic violence in the City and County of  
448 Denver (20CR965). It was a case in which William Galbreath had forcibly pimped out the mother of [REDACTED]  
449 [REDACTED] along with other women. The case was prosecuted by the Denver DA HTU and reached a resolution  
450 on 10/26/2020. Below is William Galbreath's DMV dossier and the State Court sentence notes related to the  
451 conviction and four-year probation sentence.  
452

453

Colorado Driver's License

454  
455

456  
457

458 I reviewed the police reports associated with the arrest and charging of William Galbreath which resulted in his  
459 current probation sentence. The modus operandi (MO) used in the previous case was remarkably similar to this  
460 current case, to include the fact that William Galbreath was going by the name of "Chris." In the previous case  
461 Mr. Galbreath's identity was known at the onset of the case due to the fact a family member of [REDACTED] mother  
462 called in a tip to the human trafficking hotline which identified Chris as Mr. Galbreath. The initial police  
463 investigation also revealed that Mr. Galbreath had worked as a pimp in the Denver area dating back to as early as  
464 2012 (stopped by Denver Police transporting a female sex worker to a police sting operation targeting commercial  
465 sex workers).

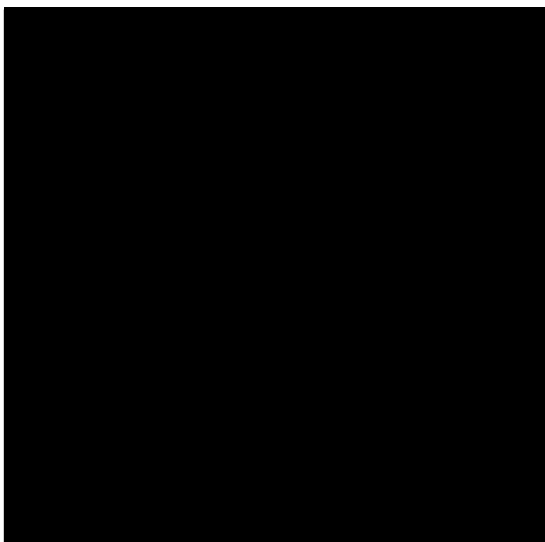
466  
467  
468

Additionally, the DMV dossier of Mr. Galbreath has a remarkable similarity to the screenshot of the video surveillance of the individual who purchased the money orders from Safeway, and I believed it is [REDACTED]

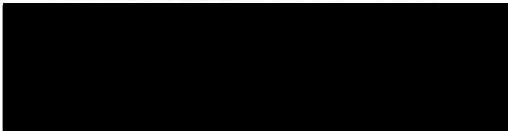
469 [REDACTED] who was standing with Mr. Galbreath in that video screenshot. Hence, at that point in the investigation  
470 I had probable cause to believe that Chris was Mr. Galbreath.

471  
472 **[REDACTED] Confirms Mr. Galbreath's Identity**

473  
474 As part of the investigation, I created a photo-lineup which included Mr. Galbreath. My intent was to have an  
475 investigator outside of this investigation present the line-up to [REDACTED]. However, on 08/15/2023, I had a series  
476 of text message exchanges with [REDACTED] who was cordial but did not want to meet with me. From the  
477 totality of the text exchanges, I suspected [REDACTED] was back working as a commercial sex worker (I later  
478 checked for recent postings of [REDACTED] who had recently posted on a commercial  
479 sex site and was using only her personal phone number as a contact – indicative of someone working on their  
480 own without a pimp). Since I was unable to meet with [REDACTED] I sent her the below DMV picture of Mr.  
481 Galbreath and asked if she recognized this person? [REDACTED] responded, "Yes that's 'Chris'" (see screenshot of  
482 my communication with [REDACTED]).

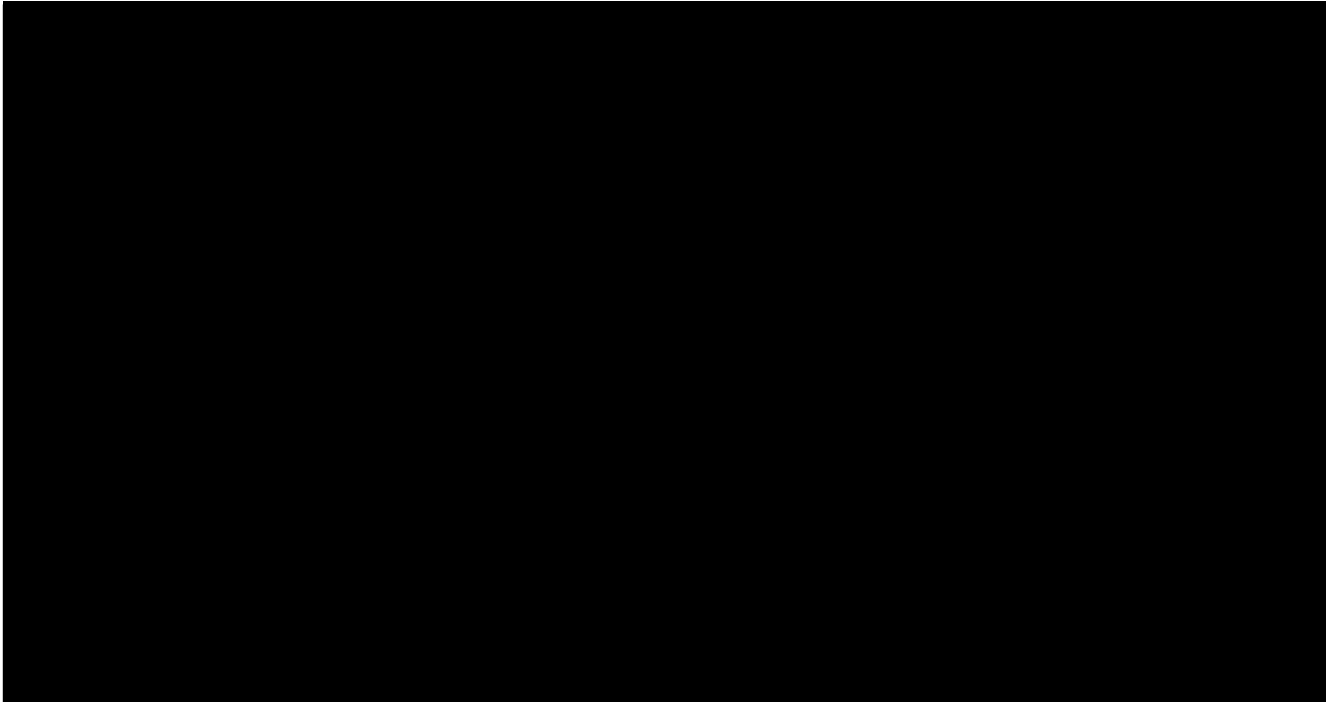


Yes that's "Chris"



484  
485  
486 **Discontinuation of Sex Ads**

487  
488 As part of this ongoing investigation, I monitor(ed) the sex ads postings of [REDACTED] on a  
489 routine basis. [REDACTED] has been posting since 2019. Shortly after this investigation commenced, [REDACTED]  
490 [REDACTED] postings were removed. Below is a screenshot from TheOtherBoard site from [REDACTED] account  
491 where the pictures of [REDACTED] have been removed and the ad scraped (compare with the ad above which  
492 was screenshots at the very early stage of this investigation – page 7 of this affidavit).  
493



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I suspected that Mr. Galbreath and/or [REDACTED] had been tipped or inferred, from [REDACTED] disassociating with the illicit operation, that law enforcement was investigating their activities.

**Interview of [REDACTED]**

Through investigation I learned that [REDACTED] was no longer staying at the Centennial East apartment residence. I suspected [REDACTED] had relocated because of this investigation. As such, I researched possible other locations she may have been staying.

On 07/23/2023, at approximately 1400 hours, I located [REDACTED] at her mother's residence, in the City of Denver. At that time, I made an unannounced visit to the residence to speak with [REDACTED] mother, [REDACTED] answered the door and advised that [REDACTED] was not at the residence. Based upon the totality of [REDACTED] demeanor I suspected otherwise and inquired further. [REDACTED] conceded that [REDACTED] was inside. [REDACTED] was generally aware of some type of investigation and was trying to avoid police. I advised [REDACTED] that [REDACTED] was not going to be arrested by me and that I requested again to speak with her. [REDACTED] agreed and beckoned [REDACTED]

Once outside on the porch with [REDACTED] requested of [REDACTED] to take a walk with me so we could have some privacy to discuss the matter. Both [REDACTED] and [REDACTED] agreed. [REDACTED] and I walked out of earshot of [REDACTED] but remained in her eyeshot. I spoke with [REDACTED] for approximately 40 minutes on the sidewalk. I had two additional recorded interviews with [REDACTED] on 07/24/2023 and 08/24/2023 along with numerous text messages with follow-up questions. I also conducted a search warrant of

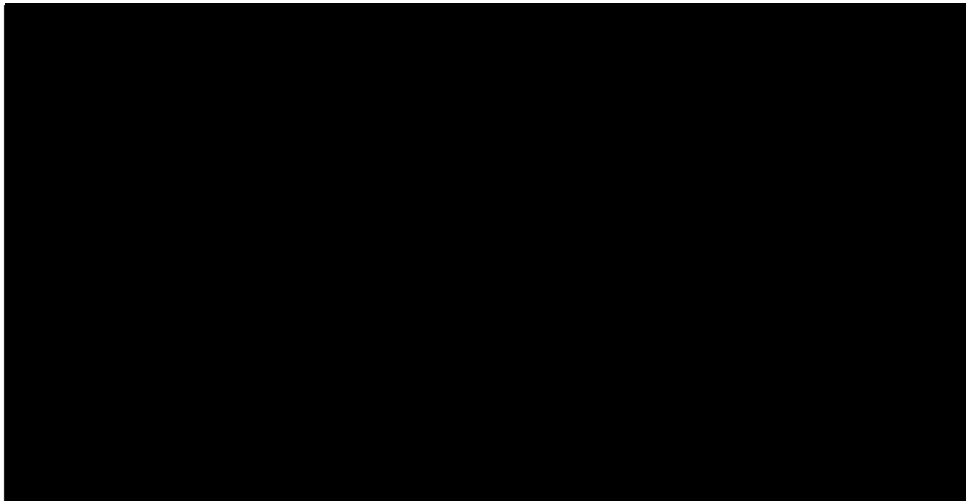
519 [REDACTED] apartment residence on 07/24/2023 where [REDACTED] accompanied me. The probable cause  
520 for the residential search warrant is incorporated within this arrest warrant affidavit by reference and attached  
521 (Attachment #4 – Search Warrant/Affidavit of [REDACTED] Residence). That search warrant resulted in  
522 evidence of prostitution occurring within the residence (condoms, lingerie, hotel receipts) and evidence of her  
523 bank accounts associated with the commercial sex trade.  
524

525 In my initial interview with [REDACTED] she volunteered that she has been a prostitute for several years but  
526 primarily working by herself. [REDACTED] further indicated that she knew Mr. Galbreath and that he sometimes  
527 helped her out with clients, but generally had a very limited role. I explained to [REDACTED] that my  
528 investigation was in-depth, and I knew otherwise. After much back-and-forth in the initial interview followed by  
529 cooperation, and then with full cooperation in the latter interviews, in summary she advised the following:  
530

- 531 1. [REDACTED] was going through a difficult time in life with serious family issues in 2019.
- 532 2. [REDACTED] was introduced to Mr. Galbreath (who also initially went by Alex and “some Mexican name”  
533 but later went by Chris) through a male/black only known to [REDACTED] as “[REDACTED]”s currently in  
534 jail, unknown for what. [REDACTED] were not a couple, but they would occasionally meet for  
535 sex. [REDACTED] wanted [REDACTED] to work for him in a sex worker/pimp relationship. [REDACTED] declined  
536 and decided to initially work on her own. [REDACTED] was house surfing at the time, staying temporarily  
537 with her cousin at an apartment near [REDACTED].
- 538 3. [REDACTED] contacted [REDACTED] via phone and told [REDACTED] he had someone he wanted [REDACTED]  
539 to meet (which turned out to be Mr. Galbreath). [REDACTED] first meeting with Mr. Galbreath occurred  
540 at the [REDACTED] [REDACTED] does not recall the  
541 date but believes it was likely in the Spring of 2019, but she is uncertain as to even the season. As such  
542 she is uncertain if she was 17 or 18 years of age.
- 543 4. At that initial meeting Mr. Galbreath bought [REDACTED] an alcoholic beverage while he explained the  
544 commercial sex business he was operating and how much money she could make. [REDACTED] agreed  
545 and did her first call that same evening at an apartment near the bar. The visit lasted an hour and Ms.  
546 [REDACTED] received \$1000.00 cash from the client. [REDACTED] gave \$500.00 to Mr. Galbreath.
- 547 5. After that first meeting [REDACTED] and Mr. Galbreath communicated with each other using a TextNow<sup>10</sup>  
548 number. They had one more outcall with a client approximately two weeks later in the mountains. Ms.  
549 [REDACTED] does not recall the specific location. After that outcall [REDACTED] left the state to be with her  
550 boyfriend in Georgia.
- 551 6. Upon return to Colorado in 2020, [REDACTED] reconnected with Mr. Galbreath by chance and began  
552 working together full-time. [REDACTED] lived with her cousin at the time, but that living situation was  
553 tenuous.
- 554 7. [REDACTED] had several moves and worked with several other sex workers associated with Mr. Galbreath  
555 before Mr. Galbreath relocated her to [REDACTED] late 2022. While working/living with the  
556 other sex workers [REDACTED] was directed by Mr. Galbreath to report to him on their activities. Those  
557 other sex workers included a drug addict by the name of [REDACTED]  
558 [REDACTED] could not communicate with due to language barrier (the Mexican nationals only spoke Spanish).

<sup>10</sup> I am personally aware through my experience that a TextNow number is an application that allows customers to use different cell numbers to communicate that are not traced to the carrier associated with the cell phone.

- 559 8. Mr. Galbreath did all of [REDACTED] sex ad postings. The emails on the posts belonged exclusively to  
560 Mr. Galbreath ([REDACTED] did not have access to the email accounts). [REDACTED] took the photos  
561 for the posts and sent them to Mr. Galbreath. Mr. Galbreath did all the contact with clients related to  
562 setting up the commercial sex transactions.
- 563 9. Mr. Galbreath had [REDACTED] open the [REDACTED] account (see below account info which I  
564 located at the residence during search). Mr. Galbreath had access to this account (passwords, pin #'s, etc.).  
565 [REDACTED] also had access to the account and logged in to see the balance, etc. and paid some of her  
566 bills with the money in the account.  
567



- 568  
569
- 570 10. [REDACTED] then opened up a second bank account at Chase. This account was solely operated by Ms.  
571 [REDACTED] Mr. Galbreath did not have passwords, etc.).
- 572 11. Mr. Galbreath had an Apple Pay account where clients paid him directly. It is unknown what Mr.  
573 Galbreath did with those funds.
- 574 12. [REDACTED] had three computer cash application accounts in her name (Venmo, Cash App, and Zelle).  
575 Payments from clients to the cash applications went directly her above [REDACTED]
- 576 13. If the client paid in cash, [REDACTED] collected same and later turned all over to Mr. Galbreath.
- 577 14. Mr. Galbreath paid for his vehicles and other expenses (such as dental bills) from [REDACTED]  
578 [REDACTED] account.
- 579 15. [REDACTED] met [REDACTED] via Mr. Galbreath. [REDACTED] was working for Mr. Galbreath and Mr.  
580 Galbreath coordinated for the two of them to live and work together at the [REDACTED]
- 581 16. The third female in the apartment at Centennial East Apartments went by the name of [REDACTED] only  
582 worked a short-time and left the business.
- 583 17. The first client [REDACTED] had with [REDACTED] (as a twosome engaged in a threesome with the client),  
584 [REDACTED] recorded the sex encounter. This caused problems with [REDACTED] and Mr. Galbreath.
- 585 18. Mr. Galbreath recently removed all of [REDACTED] commercial sex ad postings. [REDACTED] was  
586 unsure why, but believed it has something to do with this investigation.

---

<sup>11</sup> This is the only materially inconsistent statement between [REDACTED] statement was that they met via roommates.com and had lunch together for their first in-person meeting.

- 587 19. Mr. Galbreath paid for [REDACTED] last rent at the [REDACTED] with a money order.  
588 Mr. Galbreath has done this many times in the past. [REDACTED] is uncertain as to how Mr. Galbreath  
589 obtained the money orders.
- 590 20. [REDACTED] knew Mr. Galbreath had a son from listening a couple of his phone conversations when  
591 she was in his presence. In those conversations Mr. Galbreath was talking to a young male who Ms.  
592 [REDACTED] knew was Mr. Galbreath's child from the content of the call.
- 593 21. Mr. Galbreath always had at least two cell phones with him.
- 594 22. [REDACTED] has lost complete contact with Mr. Galbreath since this investigation began. Partially this is  
595 due to the fact she lost her phone, and she believes partially due to the fact Mr. Galbreath is laying low  
596 due to the investigation.
- 597 23. [REDACTED] is currently staying at friend's houses in the Denver metro area. She is not currently working  
598 in the commercial sex industry.

600 In the last interview I had [REDACTED] review Mr. Galbreath's DMV photo. [REDACTED] turn identified  
601 that subject as "Chris," the individual who operated as her pimp.

602

603 **Search Warrant ([REDACTED] Accounts)**

604

605 Based upon the above information I obtained a single search warrant for both [REDACTED] and [REDACTED]  
606 [REDACTED] accounts. The probable cause for that search warrant is incorporated into this arrest warrant  
607 affidavit by reference and attached (Attachment #5 - Search Warrant/Affidavit for [REDACTED]  
608 [REDACTED] Accounts).

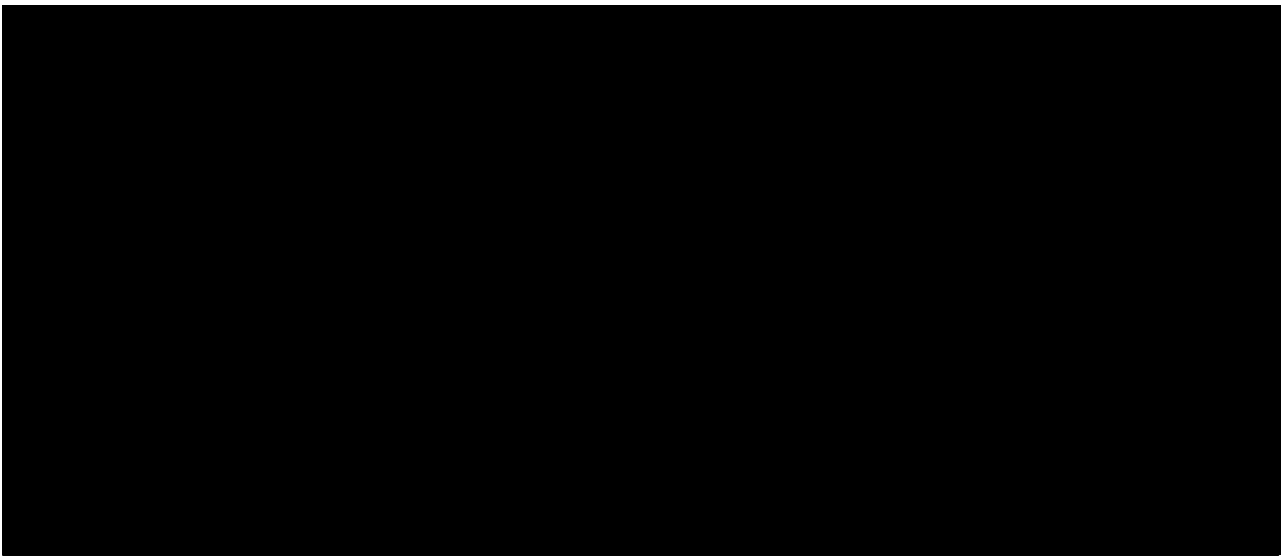
609

610 On 08/15/2023, [REDACTED] provided me with the requested materials via an online link. I noted that both  
611 bank accounts [REDACTED] were logged into numerous times with the same IP address:  
612 [REDACTED] (see below screenshots [REDACTED])

617  
618  
619  
620  
621  
622

[REDACTED]

This indicated to me that the same device was being used to login to both accounts, which I suspected would be associated with Mr. Galbreath. As such, I ran the IP address through a vetted online source and determined the address was a Comcast IP address (see below screenshot).

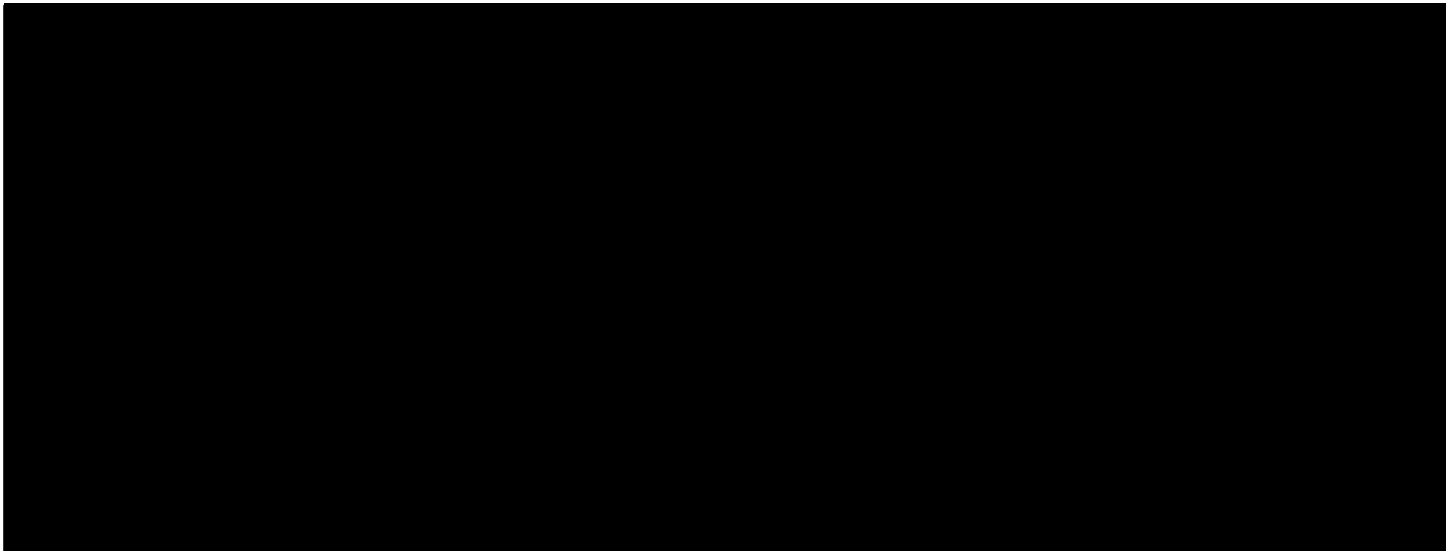


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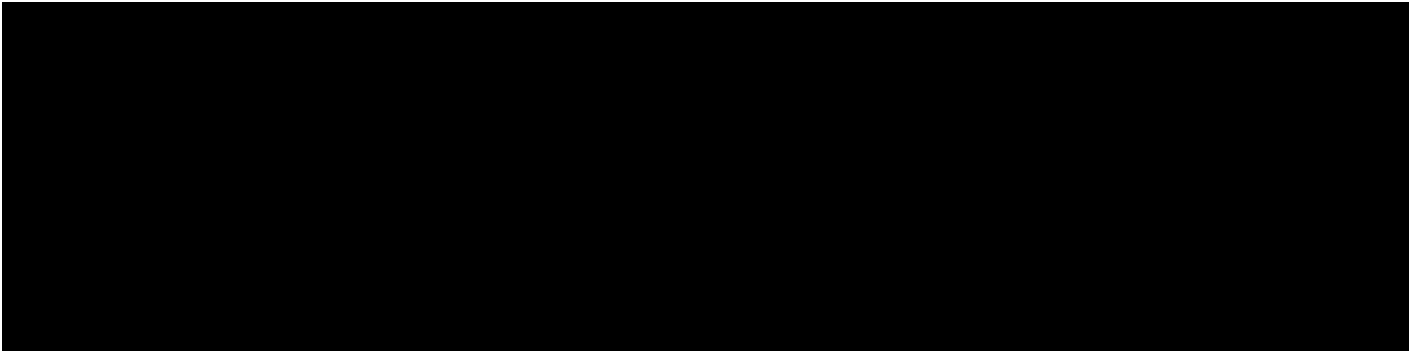
Based upon the above, I obtained a search warrant for Comcast for the above IP address information (results pending).

Additionally, within the bank data, as [REDACTED] explained above, all the car payments and dental bills made from her [REDACTED] account would have been made by Mr. Galbreath due to the fact [REDACTED] did not have a vehicle and did not have any vehicle payments (below are a several examples taken from the data from [REDACTED] account – several payments made to CarMax Auto along with the dental bills to Espire Dental, both presumably made by Mr. Galbreath):

638 **CarMax Payments**



645 **Espire Dental Payments**



653  
654 I conducted online research and learned that Espire Dental is a franchise with numerous locations throughout the  
655 Denver metro area. Based upon above I determined it was material to this investigation to learn if in fact Mr.  
656 Galbreath used the funds from the [REDACTED] account in [REDACTED] name to make payments for his  
657 dental work. For if same occurred, it would be evidence that Mr. Galbreath used proceeds from the illicit  
658 commercial sex trade in the Denver metro area to finance his life. It would be further evidence that by using Ms.  
659 [REDACTED] account in which to do same, he was laundering the proceeds from the operation.

660  
661 **CarMax Auto**

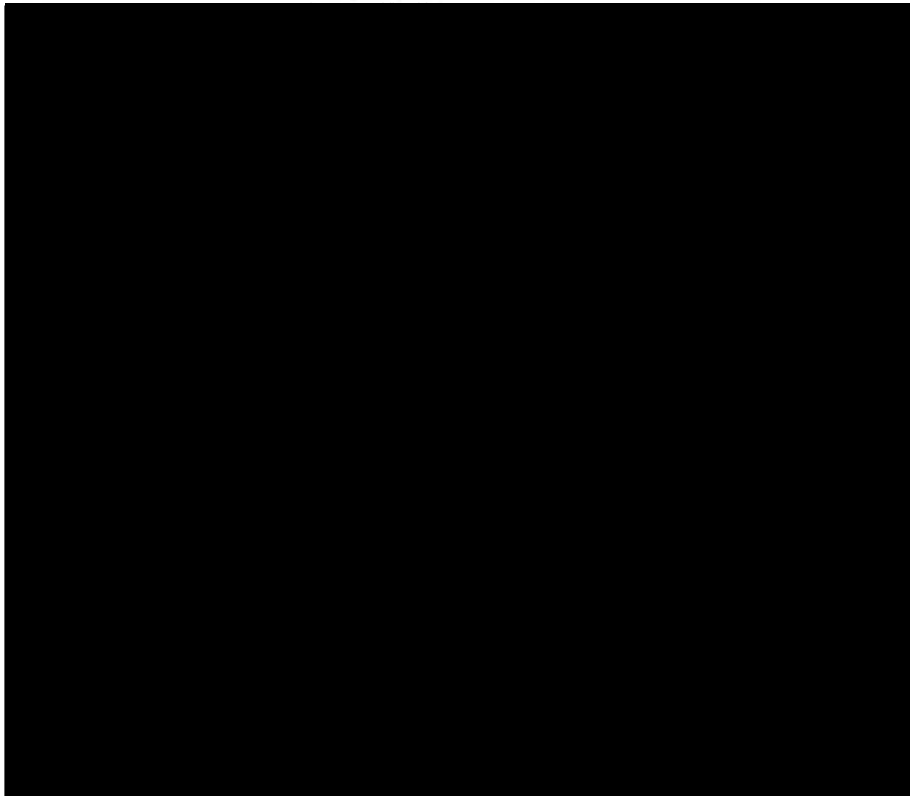
662  
663 I conducted online research and learned that CarMax Auto is a dealership with several locations throughout the  
664 Denver metro area. Based upon above I determined it was material to this investigation to learn if in fact Mr.  
665 Galbreath used the funds from the [REDACTED] account in [REDACTED] name to make car payments to  
666 CarMax for his personal vehicle(s) or for others. For if same occurred, it would be evidence that Mr. Galbreath  
667 used proceeds from the illicit commercial sex trade in the Denver metro area to finance his life. It would be further

668 evidence that by using [REDACTED] account in which to do same, he was laundering the proceeds from the  
669 operation.

670  
671 As such, I obtained search warrants for both Espire Dental and CarMax Auto related to the above listed  
672 transactions. The two search warrants are combined here and the probable cause for both are incorporated into  
673 this arrest affidavit by reference and attached (Attachment #6 – Search Warrants/Affidavits for CarMax and  
674 Espire Dental).

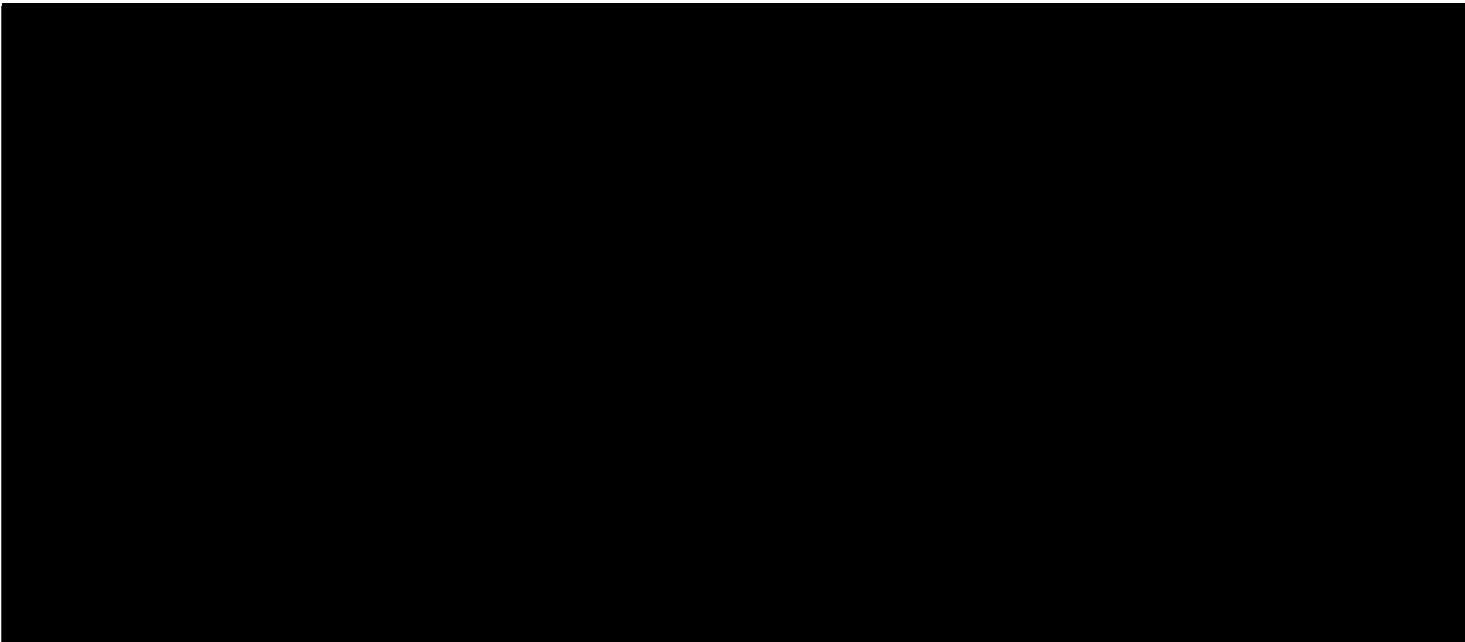
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676 **Espire Dental**

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678 On 08/28/2023, I served both warrants in-person. The Espire Dental office provided me with a printed copy of  
679 the services Mr. Galbreath received and confirmed same was paid for via [REDACTED]  
680 account. The dental offices where he received his treatments were both within the City and County of Denver.  
681 Below is a screenshot of one of the payments for Mr. Galbreath’s dental services.



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685 **CarMax Auto**

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687 CarMax Auto provided me with the purchaser of the vehicle, [REDACTED] (See below  
688 screenshot).  
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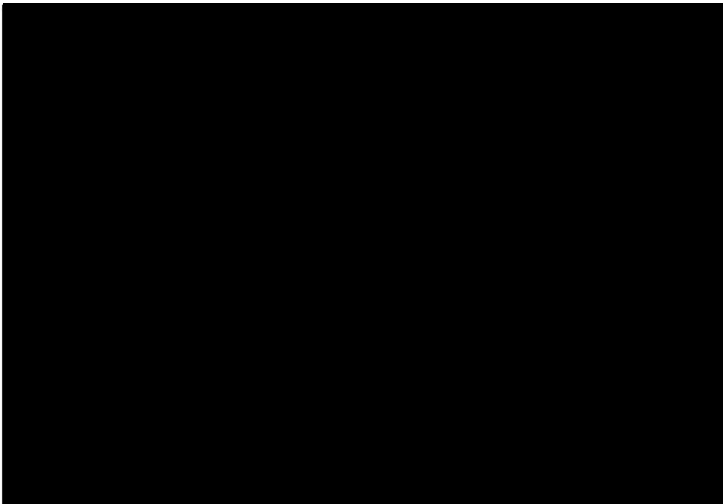


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692 *Interview of [REDACTED]*  
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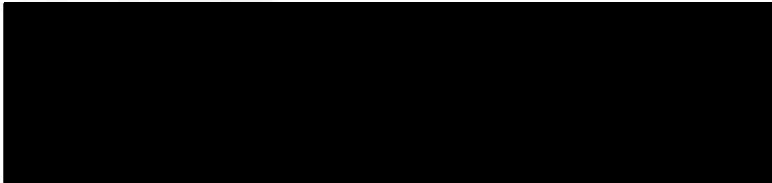
694 On 08/29/2023, through investigation, I was able to track [REDACTED] to Mexico, where she currently  
695 resides. I conducted a recorded interview with her and had follow-up text messages with her. From the totality of  
696 both, in summary, [REDACTED] advised that she met Mr. Galbreath several years back at the local bars in  
697 Denver. They became “fuck buddies.” Mr. Galbreath proposed that they go into business together. The plan was  
698 that they would use [REDACTED] good credit and purchase two vehicles under her name (the above vehicle  
699 and a second vehicle [BMW]). [REDACTED] agreed and put the down payment for the BMW and Mr.  
700 Galbreath put the down payment for the above Jeep Grand Cherokee. The Jeep was purchased at CarMax and the  
701 BMW was purchased at another local dealership. The plan then included Mr. Galbreath making the monthly  
702 payments for both vehicles and renting both vehicles out on Turo (a platform where local car owners can post  
703 their personal vehicles for rent). In turn, Mr. Galbreath would provide some of the rental income to [REDACTED]  
704 [REDACTED]

705  
706 To the best of [REDACTED] knowledge Mr. Galbreath paid the bills but she does not know through what  
707 means. However, [REDACTED] ever received any of the promised income for the rentals. This and other  
708 issues caused a serious chasm in their relationship. They keep in contact via texting related to the vehicles, but  
709 the messages between the two are curt. [REDACTED] has written off the endeavor as a loss. [REDACTED]  
710 has strong distain for Mr. Galbreath.

711  
712 I sent [REDACTED] Mr. Galbreath’s DMV photo and asked if she recognized the individual. She responded,  
713 “Yep that’s him” (see below screenshot of text exchange):  
714



Yep that's him



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**Additional Investigation – Mr. Galbreath’s Reported Income (Finances)/Residence**

***Reported Income***

As part of the ongoing investigation, I continue(d) to track Mr. Galbreath finances/income. As such, I ran Mr. Galbreath through the Colorado Department of Labor (CO DOL) to determine what income he has reported with the State of Colorado. According to the CO DOL, Mr. Galbreath has no reported income with the State of Colorado from 2017 through to current. He made a claim in 2020 for pandemic relief, but it does not appear as if he collected on the funds that were made available to him (see below screenshots of results):

Wage Detail by SSN Search

|       |      |    |      |   |      |
|-------|------|----|------|---|------|
| SSN:  | 521  | -  | 51   | - | 0486 |
| Year: | 2017 | to | 2023 |   |      |

Search    Reset

Search Results

No records found.

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728

Name: Galbreath JR, William F.  
Effective Date: 06/01/2020

Claimant ID: 10215824  
Event: New: Exp: 4/18/2021

Claim ID: 210249  
Claim Status: Expired\_Inactive

Email: wgalbreath188@gmail.com  
Current Address: 699 W 29th Ave Unit 3251, Denver, CO 80202-7104

Primary Phone: 716-944-8223  
Days of Birth: 11/22/1988

Last Employer:

| Basic Information                                       | Claim Information                    | \$       | Deductions & Payments             | Dependencies                                |
|---|--------------------------------------|----------|-----------------------------------|---|
| Program Type: <b>Federative Unemployment Assistance</b> | Maximum Benefit Amount: \$17,617     |          | Over Support Percentage: 0.00%    | Recent Compliance: <input type="checkbox"/> |
| File Date: 07/26/20                                     | Weekly Benefit Amount: \$223         |          | Claim Support Effective Date: TBD | Fast Payouts: <input type="checkbox"/>      |
| Rec'd Date:   | Week Last Contacted:                 |          | State Tax Withholding: 0.00%      | Pending Issues: <input type="checkbox"/>    |
| Job Offer Accepted End Date:                            | Eligible:                            | \$17,617 | Federal Tax Withholding: 0.00%    |   |
| Preferred Language: English                             | Has Payment Hold Status or FDLA:     | No       | Payment Option: Debit Card        |   |
| Communication Preference: Electronic                    | IC Verification Status: Not Verified |          | Jurisdiction: Arizona             |   |
| Approved Training:                                      | Last Verification Timestamp:         |          |                                   |   |
| New Hire Job Offered End Date:                          | Manually Verified:                   | No       |                                   |   |
| IFAC Checked: Yes                                       |                                      |          |                                   |   |

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### Residence

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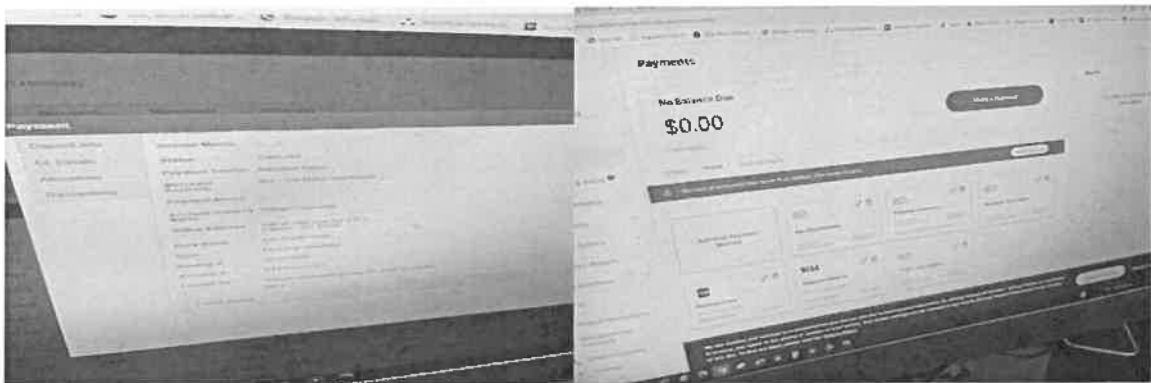
As part of this ongoing investigation, I attempted to confirm the current residence of Mr. Galbreath. Both Colorado DMV, CO DOL, and Mr. Galbreath's probation officer listed his address as: 699 W 29th Ave Unit 3251 Denver, CO 80202-7104. Through online research I learned the apartment complex is called The Metro Apartments.

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On 08/18/2023, at approximately 1400 hours, I responded to the above location, which was near Coors Field. The complex is an upscale apartment building. I met with the residential leasing manager, [REDACTED] [REDACTED] advised that Mr. Galbreath has been a resident since 2017. Further, Mr. Galbreath is on a reduced rent program due to his limited reported income. The rent for a two-bedroom two-bathroom unit like the one Mr. Galbreath is renting goes for approximately \$3,000.00 a month. Mr. Galbreath's rent is \$1,500.00. Due to the fact Mr. Galbreath is in the reduced rent program, as part of the lease agreement, the leasing agent must cooperate with law enforcement requests to provide information (hence the reason [REDACTED] was able to provide me with the requested information without any legal process). Mr. Galbreath is the only listed tenant on the lease and to the best of [REDACTED] knowledge, he is the only person living in the apartment.

[REDACTED] let me take screenshots of the accounts Mr. Galbreath has on file in which he has paid for his rent (below are those screenshots):

751



752 The account(s) information as detailed in the screenshots is as follows<sup>12</sup>:

- 753 1. ENT Credit Union; Personal checking account in the name: William Galbreath; Account #: last four digits [REDACTED]
- 754 2. Chase Sapphire Reserve Visa; Account in the name: [REDACTED]
- 755 3. Bank of America; Account #: [REDACTED]
- 756 4. Bank of America; Account #: [REDACTED]
- 757 5. Navy Federal Credit Union Flagship Checking; Account #: last four digits [REDACTED]
- 758 6. American Express Platinum Card; Account in the name: William Galbreath; [REDACTED]
- 759 [REDACTED]
- 760 [REDACTED]
- 761 [REDACTED]

### 762 Vehicles at Residence Associated with Mr. Galbreath

763 I requested of [REDACTED] via a follow-up email, to provide me with vehicles Mr. Galbreath has currently parked  
764 at the apartment complex. Ms. Knieper's email reads as follows (verbatim):

765 In the garage he parks 2 cars-

766 In C151 he parks a Black BMW X3<sup>13</sup>

767 Plate: CO- [REDACTED]

768 Last 6 of VIN- [REDACTED]

769 In C79 he parks a Black Chevy Equinox

770 Plate: CO- [REDACTED]

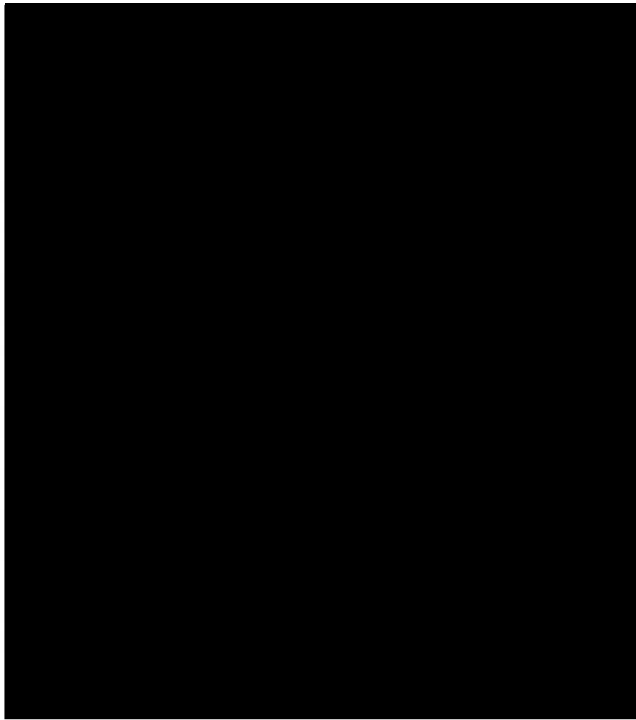
771 Last 6 of VIN- [REDACTED]

772 But on his lease, he has a Silver Dodge Charger 2008, Plate [REDACTED] (I don't know for sure if he still has  
773 this vehicle, but it sounds like maybe this is the one he leaves outside). The ones in the garage have to be  
774 very specific because we have a Parking Management system that will tow you if your License Plate or  
775 Vin is off by one # or the vehicle color doesn't match... so I'm pretty confident on those ones.

776 I ran the above vehicles through the Colorado Department of Motor Vehicles (CO DMV). There was no record  
777 for the silver Dodge charger. The black BMW came back to [REDACTED] The Black Chevy Equinox was  
778 registered to Mr. Galbreath. I did an internet search image search for 2018 black Chevy Equinox. I then sent the  
779 below text to [REDACTED] with the image of the Chevy Equinox, which includes her response:  
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<sup>12</sup> I ran the routing numbers through a vetted Lexus/Nexus database or Google to determine the banking institution when one was not listed on the screenshot. I have obtained additional search warrants for the accounts. All are pending compliance as of the time of this arrest affidavit.

<sup>13</sup> This is the second vehicle in [REDACTED] name (see section related to CarMax Auto search warrant). As of yet I have not pursued additional search warrants related to the financing of the BMW but will in the future.



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**Summation of Material Case Facts Detailed Throughout Affidavit**

1. Mr. Galbreath was convicted of Pimping/Domestic Violence in the City and County of Denver in late 2020 (20CR965). Mr. Galbreath is currently on felony probation for the offense.
2. The initial police investigation which resulted in the above felony probation sentence revealed that Mr. Galbreath had worked as a pimp in the Denver area dating back to as early as 2012 (stopped by Denver Police transporting a female sex worker to a police sting operation targeting commercial sex workers).
3. Mr. Galbreath continued to engage in pimping and related crimes throughout the Denver metro area following his conviction for pimping.
4. Mr. Galbreath targeted/recruited women who were vulnerable (homeless, young, drug addicted, etc.). As with the two women in this current case, [REDACTED] Mr. Galbreath promised great riches to the women, but only delivered a very small portion of the proceeds.
5. Mr. Galbreath had a much more established relationship with [REDACTED] and used [REDACTED] to monitor other sex workers and assist in recruiting sex workers, as she did with [REDACTED]
6. Mr. Galbreath had both [REDACTED] open [REDACTED] accounts in their respective names but required of both women to provide him with the passcodes, PIN numbers, etc., for the accounts so he could access same at his discretion.
7. Mr. Galbreath did all the online sex ad postings for sex workers in his employment. In the online sex ads Mr. Galbreath directed the commercial sex buyers to emails and phone numbers which Mr. Galbreath operated.

- 810 8. Mr. Galbreath interacted with the prospective commercial sex buyers as if he were one of the female  
811 commercial sex workers.
- 812 9. Mr. Galbreath then had the commercial sex buyers pay for the services upfront via a computer money  
813 application. Mr. Galbreath had an Apple Pay account in his son's name in which commercial sex buyers  
814 sent electronic cash payment (money transfers) to the Apple Pay account. It is unknown currently where  
815 he transferred those funds to.
- 816 10. [REDACTED] had three computer money applications where the commercial sex buyers transferred funds  
817 to her accounts (Venmo, Cash App, Zelle). Funds from those transactions went into the Bank of America  
818 account in her name.
- 819 11. Commercial sex buyers who paid in cash for services paid [REDACTED] directly. Mr.  
820 Galbreath then collected the money twice a day from the women.
- 821 12. Mr. Galbreath used cell phones to conduct much of his illicit business. Mr. Galbreath, according to Ms.  
822 [REDACTED] always had two to four phones on or about his person.
- 823 13. Mr. Galbreath has had no reported income with the Colorado Department of Revenue since 2017.
- 824 14. Mr. Galbreath's illicit commercial sex trade operation (pimping) occurred throughout the Denver metro  
825 area to include within the City and County of Denver.
- 826 15. Mr. Galbreath used deception or fraud (false promises of wealth) to successfully recruit the female sex  
827 workers (trafficking).
- 828 16. Mr. Galbreath used the [REDACTED] account in [REDACTED] name to make personal purchases  
829 such as his medical bills and car payments. Mr. Galbreath used this account for the purchases to limit his  
830 exposure to the illicit funds, hence he was laundering the money. Much of the laundered proceeds Mr.  
831 Galbreath received were laundered via purchases throughout the Denver metro area to include within the  
832 City and County of Denver.
- 833 17. Mr. Galbreath did most if not all the above transactions, which totaled in the several thousands of dollars,  
834 via a computer device.

835  
836 Based on the foregoing, I pray the Honorable Court find probable cause for the requested Arrest Warrant and  
837 issue same for the arrest of:

838  
839 **William Fredrick Galbreath, Jr. (DOB: 11/22/1985; SSN#: 521-51-0486; FBI#: 337046LC1; SID #:**  
840 **CO1919764; Male/Black; 6'03"; 210 pounds; Blk Hair/Brown Eyes, for the crimes of: Human Trafficking**  
841 **- C.R.S. §18-3-503 (F3), Pimping - C.R.S. §18-7-206 (F3), Money Laundering - §18-5-309 (1)(a) (II)(a) (F3)**  
842 **Computer Crime - C.R.S. § 18-5.5-102 (1)(b)(3)(a)(V) (F6).**  
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849 I affirm this information to be true and correct /s/ Joseph M. DeAngelo  
Signature of Affiant

850  
851 Subscribed under oath before me on 9/6/23 1100  
Date Time

852  
853   
Judge or Notary Public

My commission expires: \_\_\_\_\_

854  
855 **ARREST WARRANT**

856  
857 To all Sheriffs, Peace Officers and Police Officers with the said State:

858  
859 You are hereby commanded to take the person of the defendant and bring him without unnecessary delay  
860 before a Judge of the County Court to be dealt with according to law.

861 Bail fixed at \$ 1st Appearance   
Signature of Judge

Date 9/6/23 David Blackett  
Printed name of Judge

862  
863 I HEREBY CERTIFY that I executed the above warrant on (date) \_\_\_\_\_ by taking

864 \_\_\_\_\_  
865 \_\_\_\_\_ (name of person arrested) into custody and placing said person in the \_\_\_\_\_

866 Jail for safekeeping until further order of the court.

867 \_\_\_\_\_  
Signature of Arresting Officer

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