

**STATE OF WISCONSIN                      CIRCUIT COURT                      OUTAGAMIE COUNTY**

STATE OF WISCONSIN  
Plaintiff,

vs.

GLENWOOD NMI BROWN  
2110 West Warren Blvd  
Chicago, IL 60612  
DOB: 10/02/1978  
Sex/Race: M/B  
Eye Color: Brown  
Hair Color: Black  
Height: 5 ft 11 in  
Weight: 200 lbs  
Alias:

Defendant.

DA Case No.: 2018OU002532  
Assigned DA/ADA: Alexander E. Duros  
Agency Case No.: 16-4914  
Court Case No.: 2018CF000460

ATN: 45000000355195

**SECOND AMENDED CRIMINAL  
COMPLAINT (CORRECTION TO  
DEFENDANT MIDDLE INITIAL)**

*For Official Use*

The undersigned being first duly sworn, states that:

**Count 1: RECEIVE COMPENSATION FOR HUMAN TRAFFICKING**

The above-named defendant between February 22, 2016 and March 1, 2016, in the Town of Grand Chute, Outagamie County, Wisconsin, did knowingly receive compensation from the earnings of debt bondage, a prostitute, or a commercial sex act, as described in s. 940.302(1) (a) 1. and 2, contrary to sec. 940.302(2)(c), 939.50(3)(f), 973.046(1r), 973.047(1f) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.046(1r), if the court imposes a sentence or places a person on probation, the court shall impose a deoxyribonucleic acid analysis surcharge, calculated as follows: (a) For each conviction for a felony, \$250 (b) For each conviction for a misdemeanor, \$200.

And furthermore, invoking the provisions of Wisconsin Statute 973.047(1f), if the court imposes a sentence or places a person on probation, the court shall require the person to provide a biological specimen to the state crime laboratories for deoxyribonucleic acid analysis. The court shall inform the person that he or she may request expungement under s. 165.77 (4).

**Count 2: RECEIVE COMPENSATION FOR HUMAN TRAFFICKING**

The above-named defendant between February 22, 2016 and March 1, 2016, in the Town of Grand Chute, Outagamie County, Wisconsin, did knowingly receive compensation from the earnings of debt bondage, a prostitute, or a commercial sex act, as described in s. 940.302(1) (a) 1. and 2, contrary to sec. 940.302(2)(c), 939.50(3)(f), 973.046(1r), 973.047(1f) Wis. Stats., a Class F Felony, and upon conviction may be fined not more than Twenty Five Thousand Dollars (\$25,000), or imprisoned not more than twelve (12) years and six (6) months, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.046(1r), if the court imposes a sentence or places a person on probation, the court shall impose a deoxyribonucleic acid analysis surcharge, calculated as follows: (a) For each conviction for a felony, \$250 (b) For each conviction for a misdemeanor, \$200.

And furthermore, invoking the provisions of Wisconsin Statute 973.047(1f), if the court imposes a sentence or places a person on probation, the court shall require the person to provide a biological specimen to the state crime laboratories for deoxyribonucleic acid analysis. The court shall inform the person that he or she may request expungement under s. 165.77 (4).

**PROBABLE CAUSE:**

AND PRAYS SAID DEFENDANT BE DEALT WITH ACCORDING TO LAW; AND THAT THE BASIS FOR THE COMPLAINANT'S CHARGE OF SUCH OFFENSE IS AS FOLLOWS:

S/A Waterstreet reports that in 2016, he began investigating an individual named Glenwood Brown (DOB: 10/02/1978) for allegedly recruiting and trafficking dozens of women for prostitution purposes around the United States. S/A Waterstreet reports that he learned that Glenwood Brown would post advertisements on Backpage.com, a website commonly used for the advertisement of prostitution-related services.

During the investigation, he learned through a confidential informant that two girls, SK (DOB: 03/31/1992) and EH (DOB: 03/24/1988), were trafficked out of a hotel in the Appleton, Wisconsin.

***Victim: SK (DOB: 03/31/1992)***

On November 2, 2016, S/A Waterstreet made contact with SK. SK stated that she was previously addicted to heroin and methamphetamine, which controlled her life. SK stated that she was friends with EH. EH introduced SK to Glenwood Brown.

SK stated that Brown rented a hotel room at the Microtel in Grand Chute, Wisconsin, with the purpose of facilitating "dates" for SK and EH. SK explained that Brown created and posted numerous advertisements on Backpage.com which contained photographs of her. Brown had control of the phone, and when males would call the number associated with the advertisements, Brown would tell the males where to go and how much the services would cost. SK stated that she would just wait for Brown to tell her what to do. SK stated that when the dates arrived, she would set a timer so she would not go over the allotted time. SK stated that the males paid her money in exchange for sexual contact and sexual intercourse. SK stated that after the males left, the money would be collected by Brown. Brown would then purchase drugs and give some of the drugs to SK. SK believed she made approximately \$800.00 per night she worked.

SK stated that she would always require that the males who she had sex with wore condoms. Brown would usually purchase the condoms and give them to SK. SK stated that when the males arrived, Brown would either hide somewhere in the room or wait in the hotel lobby.

S/A Waterstreet reports that he located the advertisement Brown allegedly posted when he facilitated prostitution dates for SK out of the hotel in Appleton. The advertisement was posted on February 24, 2016 at 1:45 a.m. in the Appleton, Wisconsin section of Backpage.com. The advertisement contained two photographs of SK wearing only her underwear. The advertisement states: "Available to the upscale and business class. Donations for my time START at 100 roses. I don't entertain black men. Young Sexy and guaranteed to make you satisfied and happy. Very open minded to all things. Come play with me. 630 489 2066 in calls only!!! And my pics are truly me..Come see!! Appleton NEAR the mall. 11ss 150h 200hr ABSOLUTELY NO NEGOTIATIONS." SK stated that Brown created and posted this advertisement.

***Victim: EH (DOB: 03/24/1988)***

S/A Waterstreet reports that on December 8, 2016, he met with EH (DOB: 03/24/1988). EH stated that she met Glenwood Brown through a Craigslist advertisement he posted about prostitution. EH stated that she was struggling to make enough money to support her heroin habit, so she reached out to him. EH stated that she was friends with SK, and they both decided to work for Brown.

EH stated that Brown "ran" her and SK for approximately three weeks. EH stated that Brown would rent the hotel room, place advertisements on Backpage.com, and set up the dates. EH stated that Brown would collect money from the earnings EH and SK made from prostituting. Brown would also go to Milwaukee to pick up heroin for SK and EH, but he would only distribute certain amounts to them. EH stated that Brown gave them a half gram of heroin at a time so they could keep working as prostitutes. EH stated that Brown rented a room at the Microtel in Grand Chute, Wisconsin, for a few of the dates.

EH stated that Brown was mentally manipulating. Brown would consistently tell the girls that he would drop them off in the middle of nowhere or leave them alone somewhere if they ever did anything to them. Brown also convinced them that in the event that they got arrested, they were supposed to "take the fall" and he would bail them out of jail.

***Confirmation that Brown Rented a Hotel Room in Grand Chute, WI***

S/A Waterstreet reports that on January 10, 2017, he met with the front desk clerk at the Microtel in Appleton, Wisconsin. This is the hotel that both SK and EH stated Brown rented in order for them to prostitute. S/A Waterstreet confirmed that Glenwood Brown rented a room at the Microtel in the Town of Grand Chute, Outagamie County, Wisconsin for eight straight days between February 22, 2016 and March 1, 2016. Brown paid with cash for a total of \$599.06.

***Brown's Facebook Records***

S/A Waterstreet reports that he drafted an executed a warrant on Brown's known Facebook account. Facebook is a social media website which allows users to post information and communicate with each other. S/A Waterstreet located numerous message Brown sent to several individuals indicating that he runs an escort service and facilitates prostitution dates, including the following relevant statements:

- In July 2015, Brown sent a message to a male, E.R., which stated, “The \$\$\$ with the backpage hoes.” Brown continued, “Get you a young white chic. Preferably with a habit. And put her on backpage. Stupid money. Pimpin aint dead.” Brown also stated, “They line up for that pussy.”
- On December 30, 2015, Brown communicated with a female, M.M. Brown encouraged M.M. to come work for him, stating that the “money is lovely.” Brown stated: “I actually do all the work. I real them in through text...I just let you know when they are in the parking lot. You won’t even speak to them. I’ll tell you how much at the door then hide. I stay in the room. In calls only, no black men, only white men.”
- In January of 2016, Brown sent a message to a male, C.B., informing him that he was “pimpin out” two different “hoes.” Brown stated, “Whenever your ready I will show you how to really pimp hoes.” Brown added, “I post bitches on backpage.com.”
- In March of 2016, Brown sent a message to a male, B.W., which stated, “Running an escort service.” Brown then sent B.W. three images of himself with girls and money along with a prostitution advertisement he placed.
- On April 8, 2016, Brown sent a message to M.M. which stated, “Imma gonna try my new recruits in Birmingham by the airport. Maybe a red roof in or Super 8.”
- On June 6, 2016, Brown sent a message to a female, J.R., which stated: “Come join my escort service I need some girls.” Brown told J.R. that he had a “traveling escort service” then sent an image of himself and two naked females holding cash.
- On June 8, 2016, Brown sent a message to a female, M.M., asking her if she wanted a new job. Brown stated, “Be careful, we got popped in two stings by undercover officers. Be careful what you say in text...and what you agree to.” Brown explained that he got “popped” in Chicago. Brown explained to M.M. the prices he charged for prostitution services.
- In August of 2016, Brown sent a message to an individual, P.M., which stated “Ha I started an escort business.”
- On August 26, 2016, Brown sent a message to a male, C.B., informing him that he’s “still doing escort service...getting it.” Brown stated, “I recruit bitches and put them on backpage...from town to town..city to city..lol...I just don’t let them know they r on backpage.” Brown added, “I set up separate lines on my cellphone and handle all the text...all they know is there is a date at the door...the time and how much. I go anywhere Backpage has a listing. And not only that I can talk females into doing things they don’t like doing.”

### **“Pimp Rules”**

S/A Waterstreet reports that on August 25, 2016, he made contact with a confidential informant who indicated that Brown was previously her “pimp” and would facilitate prostitution dates for her. The confidential informant showed officers a handwritten note that Brown allegedly gave her, which she described as his “pimp rules.” The note contained several rules that Brown allegedly told his prostitutes, including the following:

- “Booty is mine to sell or use for my pleasure.”
- “No shoplifting”
- “Physical discipline may be administered.”
- “Minimum of 3 a day.”
- “All phones/electronic devices may be immediately seized or monitored.”
- “Always ask permission.”

After the rules were listed, the note says, "Now that you've read the rules, understand clearly you're dealing with a pimp."

***Backpage Activity***

S/A Waterstreet reports that he executed a warrant on Backpage.com records, attempting to identify all of the advertisements that were posted under Glenwood Brown's known email address. S/A Waterstreet reports that he is aware, based upon his training and experience, that Backpage is a website commonly used to advertise prostitution services. The results of the warrant showed a total of 225 advertisements posted to Backpage from Glenwood Brown's email address, imakemoves99@yahoo.com, between October 8, 2014 and August 9, 2016. S/A Waterstreet reports that the language and photographs used in the advertisements were consistent with prostitution advertisements. In one of the advertisements, there were pictures of Glenwood Brown with an unidentified white female posing with a large amount of US currency.

S/A Waterstreet reports that the Backpage advertisements were posted in numerous cities across the United States, including the following locations:

- Amarillo, TX
- Appleton, WI
- Birmingham, AL
- Chicago, IL
- Colorado Springs, CO
- Grand Rapids, MI
- Harrisburg, PA
- Kalamazoo, MI
- Omaha, NE
- Milwaukee, WI
- Racine, WI
- Saint Louis, MO
- Western Illinois.

S/A Waterstreet reports that he executed a warrant on Glenwood Brown's known email address, imakemoves99@yahoo.com, and confirmed that the email address was registered to Glenwood Brown.

Subscribed and sworn to before me on 08/13/18

Electronically Signed By:

Sandy Ballou

Assistant District Attorney

State Bar #: 1027867

Electronically Signed By:

Daniel Running

Complainant