

State of Michigan 54A Judicial District 30 Judicial Circuit	AFFIDAVIT IN SUPPORT OF COMPLAINT	Case No: District: Circuit:
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THE COMPLAINING WITNESS, ON INFORMATION AND BELIEF, SAYS:

1. I, Affiant AMBER KENNY-HINOJOSA, am a detective with the Ingham County Sheriff Department. I have been a certified Michigan police officer since August 1998, and have served as a detective since January 2013. My job duties include the investigation of possible criminal acts as assigned by the department.
2. In the regular course of my duties I was assigned to participate in a joint federal-state investigation into allegations that suspect TYRONE SMITH was involved in human trafficking activities. That investigation led to Sex Trafficking charges initiated in the United States District Court for the Western District of Michigan as United States of America v Tyrone Smith, Case # 1:15-cr-00135-RJJ.
3. During the course of the Tyrone Smith investigation the federal-state law enforcement team identified numerous women associated with this charged sex trafficker as present or former prostitutes. Interviews of those persons led to additional persons being identified as present or former prostitutes. Among those persons being so identified as prostitutes are women here designated as prostitutes W-1, W-2, W-3, W-4, W-5. The investigation also led to a person who, although she had never before engaged in prostitution, was persuaded to exchange sexual acts in exchange for cash. That person is herein referred to as W-6.
4. Stuart Dunnings, III is the duly elected Prosecuting Attorney for Ingham County, Michigan, and has served in this position since January 1997. As the elected Prosecuting Attorney, Stuart Dunnings, III is the chief law enforcement officer for the county. As the chief law enforcement officer for the county, he has a continuing duty imposed by law to refrain from intentionally and blatantly violating provisions of the criminal code.
5. Steven Dunnings is a licensed Michigan attorney, who was admitted to the State Bar of Michigan in February 1984. He is the brother of Prosecuting Attorney Stuart Dunnings, III.
6. In Spring 2010, W-1 posted herself as a prostitute on the internet website Escort Vault. Stuart Dunnings, III called her in response to her post, and later that day they met for commercial sex at the Red Roof Inn in Lansing. Dunnings paid W-1 \$200 for this sexual encounter.
7. For the next 5 years, Dunnings continued to see W-1 for commercial sex. They often met for sex as many as three to four times per week. Dunnings, III took W-1 to hotels and

motels in the Lansing area. Separate incidents of commercial sex occurred in the City of Lansing and in DeWitt Township.

8. Dunnings, III has paid W-1's rent and given her money on occasions not directly connected to sex acts. At one point in time, Dunnings, III told W-1 that he wanted to be her exclusive customer. W-1 declined this offer. During nearly all of this time, W-1 was using heroin.

9. Dunnings, III desired to have sex with two women at the same time, and he asked W-1 to arrange that. W-1 introduced Dunnings, III to W-2, and all three engaged in commercial sex. On at least one occasion, W-1 briefly videotaped one of their commercial sex transactions.

10. W-2 met Stuart Dunnings, III through W-1 in 2011. At the time, W-2 was posting as a prostitute on the internet site Escort Vault. Dunnings, III called W-2 and took her to lunch. The next time they met, Dunnings, III and W-2 had commercial sex at a Lansing motel. W-2's fees were \$100 per half hour, \$160 per hour, and \$140 per hour for multiple hours. Dunnings, III typically gave her a couple hundred dollars per occasion. Early into the relationship, Dunnings, III told W-2 he was the Ingham County Prosecutor.

11. W-2 continued commercial sex dates with Dunnings, III on a regular basis. They had commercial sex over 200 times. Their meetings typically involved going to dinner and then going to a motel. Sometimes Dunnings, III did not have time to take W-2 to dinner and would only pick up W-2 and take her to a hotel or motel. Dunnings, III usually called W-2 to schedule the time to meet, which was often on a Tuesday. Dunnings, III often came to W-2's house later the same day.

12. When they first began having commercial sex, Dunnings, III paid W-2 each time following the sexual activity. As their relationship progressed, Dunnings, III sometimes gave W-2 money for her general use. Dunnings, III purchased clothing for W-2, paid her cellular phone bill, took her grocery shopping, and paid her membership at the YMCA.

13. After knowing Dunnings, III for about six months, W-2 told Dunnings, III she was addicted to heroin. Dunnings, III paid about \$80 per week for W-2's methadone treatments. Dunnings, III sometimes attended Narcotics Anonymous meetings with W-1 and W-2. Around this time, the Lansing Police arrested W-2 and she was charged with possession of drug paraphernalia. Dunnings, III took money to W-2's mother to pay for W-2's bond.

14. During the period from 2011 through 2015, Stuart Dunnings, III engaged in commercial sex with W-2 at various locations, including the City of Lansing, DeWitt Township, The City of Okemos, and the City of Portland.

15. In early 2014, W-3 posted on the website Backpage.com. Stuart Dunnings, III called W-3 and arranged a commercial sex date. Stuart Dunnings, III and W-3 had commercial sex approximately five times, each time for \$200. The two communicated via cell phone

and text. W-3 responded to all of her calls and texts because her pimp would beat her if she did not respond. Stuart Dunnings, III told W-3 to call him back at his office. When W-3 called, the line was answered as the Ingham County Prosecutor's Office and W-3 was transferred to Dunnings, III.

16. About one week following the initial encounter with Stuart Dunnings, III, W-3 had her first commercial sex date with Steven Dunnings. Steven Dunnings identified himself as an attorney, and told W-3 his brother Stuart was the Ingham County Prosecuting Attorney. W-3 and Steven Dunnings had commercial sex about six or seven times. On one occasion, Steven Dunnings asked W-3's pimp for permission to take W-3 to a certain motel because Steven did not like the pimp's preferred motel.

17. W-3 was routinely beaten by her pimp, and throughout the time she had commercial sex with Stuart Dunnings, III and Steven Dunnings she had observable bruising on her body. W-3 also had multiple, visible needle tracks on her arms from heroin use.

18. Some of these separate incidents of commercial sex between W-3 and Stuart Dunnings, III and Steven Dunnings occurred in the City of Lansing.

19. W-4 began working as a prostitute because she was a heroin and crack cocaine user and needed money. Her pimp provided her drugs in exchange for her work, imprisoned her in his house, and beat her. On one occasion, he beat her so severely that W-4 could barely walk and was unable to open her eye for several days. W-4 frequently had bruises on her body that would have been visible to her customers.

20. In early 2014, W-4 and W-3 met Stuart Dunnings, III at the Magnuson Hotel in Lansing for commercial sex. W-4 and W-3 met with Stuart Dunnings, III a second time approximately three weeks later at her pimp's house in Lansing. During the second meeting, Dunnings, III told W-4 he was the county prosecutor.

21. W-4 frequently had commercial sex with Steven Dunnings, and she considered him a regular customer. This commercial sex occurred at several locations in the City of Lansing.

22. W-5 met Stuart Dunnings, III in Spring 2015, while she was working for a pimp. Dunnings, III responded to W-5's advertisement as a prostitute on the website Backpage.com. Dunnings, III paid W-5 \$150 for approximately 15 minutes of commercial sex at her apartment in Holt, Michigan. This was the only incident of commercial sex between the two of them.

23. In 2010, W-6 was involved in a custody dispute with the father of her child. She sent an email to Stuart Dunnings, III, seeking assistance in this custody matter. Dunnings, III responded, and had W-6 meet him at his office. W-6 advised Dunnings, III that she had been the victim of domestic violence, and that the father of her child was the person who assaulted her.

24. After discussing the custody matter, Dunnings, III invited W-6 to lunch at a café in a downtown Lansing hotel. She accepted the offer, and had lunch with him. They parted right after the lunch, and W-6 did not give the matter much thought.

25. Shortly thereafter, Dunnings, III invited W-6 to lunch a second time. That lunch occurred in the City of Lansing. During that second lunch, Dunnings, III noted that he was aware that W-6 was struggling financially, and that he had a proposition for her. Dunnings, III advised W-6 that he was seeking a sexual relationship with her, and that he would pay her money in return.

26. W-6 was initially shocked by this proposition, and did not immediately accept. After thinking the proposition over, she felt she had no choice but to accept. W-6 then began an on-and-off one to two year commercial sex relationship with Dunnings, III. W-6 estimates that Dunnings, III paid her about \$600 every two weeks during the times they would meet for commercial sex. In addition to giving W-6 cash, he also provided her with gifts and paid some of her bills.

27. Dunnings, III's position as the Ingham County Prosecutor influenced W-6's decision to engage in commercial sex with him. She both hoped that he would help her in her child custody dispute, and feared that he might cause her problems if she refused his proposition. While W-6 had no adult arrests or drug use, she was afraid that he might make up something negative to hurt her if she did not go along. W-6 asserts that she would not have gone along with the commercial sex if Dunnings, III had not been the Prosecutor.

28. Dunnings, III and W-6 engaged in commercial sex at various locations, including W-6's home in a Lansing trailer park, the Fairfield Hotel and the Causeway Bay Hotel in Lansing.

29. W-6 had never engaged in prostitution before the proposition by, and resulting commercial sex with, Dunnings, III. Likewise, she has not had commercial sex with any other person after being induced to engage in prostitution by Dunnings, III.

Reviewed on: _____

Det. AMBER KENNY-HINOJOSA (Affiant)
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Subscribed and Sworn before me on: _____ Date

Honorable _____
Judge,/Magistrate – 54A District Court