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**IN THE THIRD DISTRICT COURT
IN AND FOR THE COUNTY OF SALT LAKE, STATE OF UTAH**

THE STATE OF UTAH,

Plaintiff,

-vs-

JAMES SAVAGE BROWN
DOB: 3/21/1966

Defendant.

INFORMATION

Attorney General Report #2018-357
Salt Lake City Police Report #2018-39814

Case No.: _____

Judge: _____

The undersigned states upon information and belief that the above-listed defendant committed the following criminal offenses:

COUNT I

AGGRAVATED HUMAN TRAFFICKING FOR FORCED SEXUAL EXPLOITATION
(FIRST DEGREE FELONY)
(Victim 1)

On or about and between January of 2011 and October 2, 2018, in Salt Lake County, State of Utah, in violation of Title 76, Chapter 5, Section 310, Utah Code Annotated, the defendant **JAMES SAVAGE BROWN**, did recruit, harbor, transport, obtain, patronize, or solicit a person for forced sexual exploitation, through the use of force fraud and coercion, as

defined in U.C.A. 76-5-310, and in the course of doing so also committed rape or forcible sodomy.

COUNT II

**AGGRAVATED HUMAN TRAFFICKING FOR FORCED SEXUAL EXPLOITATION
(FIRST DEGREE FELONY)
(Victim 2)**

On or about and between February and March 6, 2018, in Salt Lake County, State of Utah, in violation of Title 76, Chapter 5, Section 310, Utah Code Annotated, the defendant **JAMES SAVAGE BROWN**, did recruit, harbor, transport, obtain, patronize, or solicit a person for forced sexual exploitation, through the use of force fraud and coercion, as defined in U.C.A. 76-5-310, and in the course of doing so also committed rape and forcible sodomy.

COUNT III

**AGGRAVATED KIDNAPPING
(FIRST DEGREE FELONY)
(Victim 2)**

On or about and between February and March 6, 2018, in Salt Lake County, State of Utah, in violation of Title 76, Chapter 5, Section 302, Utah Code Annotated, the defendant, **JAMES SAVAGE BROWN**, did intentionally or knowingly, without authority of law, and against the will of the victim, detain or restrain the victim for any substantial period of time, and the defendant did so: a) while possessing, using, or threatening to use a dangerous weapon as defined in Section 76-1-601, to wit: a knife; or b) to commit a sexual offense as described in U.C.A. 76-5-4, to wit: the defendant raped or forcibly sexually abused Victim 2.

COUNT IV

**RAPE
(FIRST DEGREE FELONY)
(Victim 2)**

On or about and between February and March 6, 2018, in Salt Lake County, State of Utah, in violation of Title 76, Chapter 5, Section 405, Utah Code Annotated, the defendant, **JAMES SAVAGE BROWN**, did engage in sexual intercourse with another person without the victim's consent, to wit: the defendant had sex with Victim 2 without her consent.

COUNT V

**FORCIBLE SODOMY
(FIRST DEGREE FELONY)
(Victim 2)**

On or about and between February and March 6, 2018, in Salt Lake County, State of Utah, in violation of Title 76, Chapter 5, Section 403, Utah Code Annotated, the defendant, **JAMES SAVAGE BROWN**, did engage in any sexual act with a person who is 14 years of age or older involving the genitals of one person and mouth or anus of another person, regardless of the sex of either participant, and did so without the victim's consent, to wit, the defendant forced Victim 2 to engage in oral and anal sex against her will and without her consent.

COUNT VI

**AGGRAVATED EXPLOITATION OF PROSTITUTION
(SECOND DEGREE FELONY)
(Victim 1)**

On or about and between January of 2011 and October 2, 2018, in Salt Lake County, State of Utah, in violation of Title 76, Chapter 10, Section 1306, Utah Code Annotated, the defendant, **JAMES SAVAGE BROWN**, did exploit prostitution, in that he did encourage, induce, or otherwise purposely cause another to become or remain a prostitute; did transport a person into or within this state with a purpose to promote that person's engaging in prostitution or procuring or paying for transportation with that purpose; did share the proceeds of prostitution with a prostitute pursuant to an understanding that he is to share therein; or did own, control, manage, supervise, or otherwise keep, alone or in association with another, a house of prostitution or a prostitution business, and in the course of exploiting prostitution the defendant: a) committed human trafficking as defined in U.C.A. 76-5-308; or b) used force, threats, or fear against the victim.

COUNT VII

**AGGRAVATED EXPLOITATION OF PROSTITUTION
(SECOND DEGREE FELONY)
(Victim 2)**

On or about and between February and March 6, 2018, in Salt Lake County, State of Utah, in violation of Title 76, Chapter 10, Section 1306, Utah Code Annotated, the defendant, **JAMES SAVAGE BROWN**, did exploit prostitution, in that he did encourage, induce, or otherwise purposely cause another to become or remain a prostitute; did transport a person into or within this state with a purpose to promote that person's engaging in prostitution or procuring or paying for transportation with that purpose; did share the proceeds of prostitution with a

prostitute pursuant to an understanding that he is to share therein; or did own, control, manage, supervise, or otherwise keep, alone or in association with another, a house of prostitution or a prostitution business, and in the course of exploiting prostitution the defendant: a) committed human trafficking as defined in U.C.A. 76-5-308; or b) used force, threats, or fear against the victim.

PROBABLE CAUSE STATEMENT

This INFORMATION is based upon evidence from Attorney General's Report 2018-357 and Salt Lake City Police Report 2018-39814 and witness statements as indicated:

In June 2018, Utah Attorney General Special Agent Joe Shuler and Supervisory Special Agent Josh Caless learned of individuals reporting to have been trafficked for sexual exploitation.

On or about June 21, 2018, SA Shuler and SSA Caless met an individual, hereinafter Victim 1, and discussed her story. Victim 1 explained that she felt she needed to come forward and share her story due to a recent experience while incarcerated at the Salt Lake County Adult Detention Center (ADC). While at ADC, Victim 1 served time with another individual, hereinafter Victim 2. Victim 1 learned that Victim 2 had been assaulted and sexually abused by the defendant, James Savage Brown. Victim 1 also learned that the defendant was using Victim 1's name to recruit others into his commercial sex organization. Brown would explain what he had forced Victim 1 to do for money and then attempt to persuade Victim 2, and others, to do the same.

Victim 1 reported to investigators that she met the defendant approximately 7 or 8 years ago at a bus stop in Sandy, Utah. The defendant took Victim 1 to his apartment and prevented her from leaving for several days. Eventually, Victim 1 was able to leave during the middle of the night but felt compelled to return several days later to deliver money owed to Brown.

Victim 1 explained that for the next 7 to 8 years, Brown would compel her to work for him in commercial sex. The defendant threatened Victim 1 with violence and intimidated her to "go get that money," or "prostitute." Additionally, Brown would use controlled substances as a means to coerce Victim 1 into working for him in commercial sex. Victim 1 also reported that Brown would threaten her with violence from his wife, Ava Henry, if Victim 1 did not engage in commercial sex and give him the money. Victim 1 was expected to give all of the money she earned from commercial sex to the defendant. Brown would usually require Victim 1 to find her own clients or "dates." However, there were times when Brown's friends would arrive to

purchase drugs and Brown would force Victim 1 to have sex with his friends, threatening her with violence if she did not obey.

On or about July 18, 2018, SA Shuler and SSA Caless interviewed Victim 2 at the ADC. Victim 2 reported that around February of 2018, she was staying with a friend at the Zions Motel in Salt Lake City. The friend instructed Victim 2 to deliver heroin to Brown, who was staying in a separate room. Victim 2 did so. Prior to this time, Victim 2 had never met Brown. After receiving the heroin, Brown slid a large dresser in front of the door and placed a large knife on top. Brown told Victim 2 she would not be leaving and proceeded to rape her. At no time did Victim 2 consent to have sex with Brown. She told Brown that she was married and that she did not want to have sex. After raping her, Brown attempted to recruit Victim 2 into commercial sex.

Victim 2 told investigators that Brown kept her in the room for multiple days. Brown would have long conversations trying to convince Victim 2 to perform sexual acts for money. Brown told Victim 2 he had forced Victim 1 to do this and she had made him money. During this time, Brown prevented Victim 2 from leaving the motel and raped her multiple times. Victim 2 said Brown would provide her with enough heroin to keep her from getting sick and to allow her to get out of bed. Brown explained that if Victim 2 would engage in commercial sex for him, she would never have to worry about drugs and that he would take care of her.

Victim 2 explained that after several days, the manager of the Zions Motel came to the room and kicked Brown out for failing to pay rent. The manager also threatened to call the police. Brown and Victim 2 quickly gathered their possessions and left the room. Brown purchased heroin to relieve Victim 2's withdrawal, but while walking back to the Zions Motel, Brown dropped a bag and entered the Salt Lake Community College. Victim 2 said that she picked up the bag and jaywalked in front of a Salt Lake City Police Officer. The officer engaged her and during the encounter Victim 2 reported being raped.

SA Shuler learned from SLCPD that an investigation had been opened into the Zions Motel incident, in which Victim 2 reported being raped by Brown, as well as being forced to do oral, anal, and vaginal sex. Victim 2 had a Code R Kit administered. During that exam, Victim 2 reported that Brown stepped on her, grabbed her tight around her shoulders, hit her with his fists while holding something that cut her face, hit her with a mini bat all over, said that he had a gun, burnt her on her breasts and abdomen with a cigarette and stuck and broke off an insulin needle in her arm. SLCPD obtained surveillance video which shows Brown and Victim 2 leaving the motel room just prior to when Victim 2 made contact with SLCPD.

On or about October 2, 2018, SA Shuler spoke again with Victim 1. She explained that after hearing of a local sex worker who had been murdered and after losing her housing, she relapsed into drug use. Approximately two weeks prior, she went to a party with the defendant.

Brown again instructed Victim 1 to engage in sexual acts for money. Victim 1 reported that she complied and was forced to give Brown all of the money that she made.

A warrant with bail denied is requested because there is substantial evidence to support the numerous felony charges. Allowing the defendant bail would create a significant danger of a breach of the peace, injury to persons or property, or danger to the community. The Defendant is a flight risk. He is currently facing multiple first and second degree felony charges, and has a lengthy criminal history, in both Utah and California. The Defendant poses a risk of danger the community based on the threats he made to the victims in this case.

Pursuant to Utah Code Annotated § 78B-18a-106, I declare under criminal penalty of the law of Utah that the foregoing is true and correct.

Executed on: November 13, 2018

/s/ Joe Shuler
Special Agent Joe Shuler
Declarant

Authorized for presentment and filing:
SEAN D. REYES, Utah Attorney General

/s/ Tye Christensen
TYE CHRISTENSEN
Assistant Utah Attorney General
This 13th day of November, 2018.
AG Case No. 2018-357 and SLCPD Case No. 2018-39814