

SEX TRAFFICKING BUYER CONVICTIONS IN MISSOURI



Quick Facts

1 Sting Operation



7 Buyers Arrested



Most Common Initial Charge

Sex Trafficking

Most Common Final Charge

Sex Trafficking

Case Summary

The first federal cases to charge an attempted buyer of sex with a minor under the federal sex trafficking law were prosecuted in the Western District of Missouri in 2009. These prosecutions were the result of Operation Guardian Angel, which involved local and federal collaboration and led to 7 arrests, all of which concluded in guilty pleas under federal sex trafficking and CSEC (commercial sexual exploitation of children) laws. Even though these cases were prosecuted before the Eighth Circuit decision in *United States v. Jungers* established appellate precedent for prosecuting buyers of sex with minors under the federal sex trafficking law, 18 U.S.C. § 1591, prosecutors were able to bring the full force of the federal sex trafficking and CSEC penalties, including mandatory minimum sentences, to bear in these cases.

“...Operation Guardian Angel, the first law enforcement operation to target buyers of sex with minors as sex trafficking offenders.”

“Operation Guardian Angel, which involved local and federal collaboration... led to 7 arrests, all of which concluded in guilty pleas under federal sex trafficking and CSEC...laws.”

Criminal Consequences

The Sting Operation

Operation Guardian Angel was a collaborative investigation by the Independence Police Department, the Kansas City Police Department, the Federal Bureau of Investigation and U.S. Immigration and Customs Enforcement in conjunction with the Human Trafficking Rescue Project. In order to investigate and arrest those seeking to purchase sex with minors, law enforcement posted online advertisements for commercial sex with minors. According to a Department of Justice press release, “the ads clearly stated that the [decoy victims] were ‘little girls’ and were ‘young.’ Those who responded to the ads were given directions to an undercover location that was outfitted with audio and video recording equipment. When they arrived at the undercover residence and paid cash for [sex with] a child . . . they were arrested by task force officers.”

The Prosecution

The cases were prosecuted by former Assistant U.S. Attorney Cynthia L. Cordes and all defendants arrested in the sting were initially charged under the federal sex trafficking law. As confirmed in a Department of Justice press release, “[t]his operation marks the first time that the U.S. Department of Justice has utilized the Trafficking Victims Protection Act to prosecute customers who allegedly attempt to pay for sex with children.” In *United States v. Mikoloyck*, one of the defendants challenged the use of the federal sex trafficking law to prosecute him as an attempted buyer of sex. The magistrate made a recommendation to the district court judge that “18 U.S.C. § 1591 clearly applies to those who attempt to purchase underage sex, not merely the pimps of actual exploited children.” The district court accepted the magistrate’s decision and established precedent at the district court level that was later confirmed by an Eighth Circuit appellate decision in *United States v. Jungers* which held that buyers of sex with minors were not exempt from prosecution under the federal sex trafficking law.¹ Ultimately, six of the seven defendants pled guilty to child sex trafficking charges, and all were sentenced to 10–15 years in prison.

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Outcomes

Case Name	Initial Charges at Prosecution	Max Penalty Under Prosecution Charges	Final Charges at Disposition	Sentencing Outcome
US v. Albers	Sex trafficking, CSEC	Life imprisonment	Pled to sex trafficking charge ²	15 years in prison, 10 years supervised release
US v. Childers	Sex trafficking, CSEC (2 charges)	Life imprisonment	Pled to all charges	15 years in prison on each count (concurrent), 10 years supervised release
US v. Cockrell	Sex trafficking, CSEC (2 charges)	Life imprisonment	Pled to sex trafficking charge	10 years in prison, 5 years supervised release
US v. Oflyng	Sex trafficking, CSEC	Life imprisonment	Pled to sex trafficking charge	15 years in prison, 5 years supervised release
US v. Doerr	Sex trafficking, CSEC	Life imprisonment	Pled to sex trafficking charge	15 years in prison on each count (concurrent), 10 years supervised release
US v. Johnson	Sex trafficking, CSEC (2 charges)	Life imprisonment	Pled to CSEC charge	15 years in prison, 5 years supervised release
US v. Mikoloyck	Sex trafficking, CSEC (2 charges)	Life imprisonment	Pled to sex trafficking charge ³	10 years in prison, supervised release term not set

¹ *United States v. Jungers*, 702 F.3d 1066, 1072 (8th Cir. 2013); see also Samantha Healy Vardaman & Christine Raino, Prosecuting Demand As A Crime Of Human Trafficking: The Eighth Circuit Decision In *United States v. Jungers*, 43 U. Mem. L. Rev. 917 (Summer 2013).

² 18 U.S.C. § 1591 (Commercial Sex Trafficking of a Child)

³ 18 U.S.C. § 2423 (Travel for purpose of engaging in illicit sexual conduct with a child)