

Approved: \_\_\_\_\_

BOYD M. JOHNSON III

RITA GLAVIN

DANIEL STEIN

Assistant United States Attorneys

Before: HONORABLE RONALD L. ELLIS  
United States Magistrate Judge  
Southern District of New York

**08 MAG 0463**  
SEALED COMPLAINT

-----X  
UNITED STATES OF AMERICA :

- v. - :

MARK BRENER, :  
a/k/a "Michael," :

CECIL SUWAL, :  
a/k/a "Katie," :  
a/k/a "Kate," :

TEMEKA RACHELLE LEWIS, :  
a/k/a "Rachelle," and :

TANYA HOLLANDER, :  
a/k/a "Tania Hollander," :

Defendants. :

-----X  
SOUTHERN DISTRICT OF NEW YORK, ss.:

KENNETH HOSEY, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation, and charges as follows:

COUNT ONE

1. From in or about December 2004 to in or about March 2008, in the Southern District of New York and elsewhere, MARK BRENER, a/k/a "Michael," CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," and TANYA HOLLANDER, a/k/a "Tania Hollander," the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to violate Sections 1952(a)(3), 2421, and 2422(a) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that MARK BRENER, a/k/a "Michael," CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," and TANYA HOLLANDER, a/k/a "Tania Hollander," the defendants, and others known and unknown, would and did use and cause to be used facilities in interstate commerce, to wit, cellular telephones and e-mail, with intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, to wit, a business enterprise involving prostitution offenses in violation of applicable State law, and thereafter did perform and attempt to perform an act to promote, manage, establish, and carry on and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3).

3. It was a further part and an object of the conspiracy that MARK BRENER, a/k/a "Michael," CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," and TANYA HOLLANDER, a/k/a "Tania Hollander," the defendants, and others known and unknown, unlawfully, willfully and knowingly would and did transport individuals in interstate and foreign commerce with intent that such individuals engage in prostitution, and in sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2421.

4. It was a further part and an object of the conspiracy that MARK BRENER, a/k/a "Michael," CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," and TANYA HOLLANDER, a/k/a "Tania Hollander," the defendants, and others known and unknown, unlawfully, willfully and knowingly would and did persuade, induce, entice, and coerce individuals to travel in interstate and foreign commerce to engage in prostitution and in sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422(a).

#### Overt Acts

5. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. From in or about December 2004 through in or about March 2008, MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, controlled a website

located at URL [www.emperorsclubvip.com](http://www.emperorsclubvip.com). that included photographs of prostitutes' bodies, with their heads hidden, along with hourly rates for different categories of prostitutes;

b. From in or about December 2004 through in or about at least January 2008, MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, received applications from women seeking to work as prostitutes with their prostitution business (hereinafter, the "Emperors Club") at various e-mail accounts;

c. On or about January 9, 2008, MARK BRENER, a/k/a "Michael," CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," and TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendants, spoke over the telephone about offering the Emperors Club's clients the opportunity to exercise a "buyout clause," which would permit clients to purchase direct access to one of the Emperors Club's prostitutes without having to contact the agency;

d. On or about January 15, 2008, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, spoke with a client of the Emperors Club over the telephone about arranging for a prostitute to come to his room at a hotel in New York, New York;

e. On or about January 15, 2008, a prostitute working with the Emperors Club went to a client's hotel in New York, New York;

f. On or about January 18, 2008, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, spoke over the telephone with a new prostitute working with the Emperors Club who told LEWIS that she had never "done anything like this before" and was a "little bit nervous about it";

g. On or about January 18, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, sent an e-mail to a potential prostitute asking her to send photographs of herself to SUWAL;

h. On or about January 22, 2008, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, told an Emperors Club client that he should not be concerned about sending a wire transfer to the Emperors Club because the wire would be sent to "QAT Consulting" so it would show up "like as a business transaction";

i. On or about January 24, 2008, a prostitute working with the Emperors Club went to a hotel in Los Angeles,

California;

j. On or about January 24, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, received an e-mail from a potential prostitute declining to work for the Emperors Club in part because her friend had to have sex with a client "twice in an hour";

k. On or about January 24, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, sent an e-mail to TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, attaching a list of the aliases used by more than 50 prostitutes working with the Emperors Club in, among other places, New York, New York; Los Angeles, California; Miami, Florida; London, England; and Paris, France;

l. On or about January 24, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, sent an e-mail to a prostitute working with the Emperors Club and asked if she would be available on February 11, 2008, in Europe for an extended prostitution date with a client to cost \$25,000 or more.

m. On or about January 26, 2008, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, spoke with a client of the Emperors Club over the telephone about arranging for a prostitute to come to his room at a hotel in Los Angeles, California;

n. On or about January 27, 2008, a prostitute working with the Emperors Club went to a client's hotel in Los Angeles, California;

o. On or about January 27, 2008, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, spoke with an Emperors Club client over the telephone who asked LEWIS whether the QAT consulting company could be traced because he had heard of agencies like the Emperors Club getting "busted";

p. On or about January 28, 2008, MARK BRENER, a/k/a "Michael," CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," and TANYA HOLLANDER, a/k/a "Tania Hollander," the defendants, met in the vicinity of Grand Central Terminal in New York, New York;

q. On or about January 28, 2008, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, spoke with an Emperors Club client over the telephone about arranging for a prostitute to travel from New York to Washington, D.C., to his hotel;

r. On or about January 30, 2008, MARK BRENER, a/k/a "Michael," CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," and TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendants, spoke over the telephone regarding problems with one of the Emperors Club's prostitutes who they believed might be abusing drugs;

s. On or about January 30, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, sent TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, a text message over the telephone asking HOLLANDER to contact an Emperors Club client to arrange an appointment with an Emperors Club prostitute in New York on February 1, 2008;

t. On or about January 30, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, sent TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, a text message over the telephone asking HOLLANDER to send two particular prostitutes on dates with Emperors Club clients in New York if possible, and HOLLANDER agreed;

u. On or about January 31, 2008, TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, sent CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, a text message over the telephone informing SUWAL that she had scheduled a date for an Emperors Club client with an Emperors Club prostitute in Europe;

v. On or about February 7, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," and TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendants, spoke over the telephone about the fact that an Emperors Club client had complained that one of their prostitutes was "more sex than sexy";

w. On or about February 11, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," and TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendants, communicated via text message about the fact that the three-day rates for two of the Emperors Club prostitutes were \$50,000 and \$35,000, respectively;

x. On or about February 12, 2008, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, spoke with an Emperors Club client over the telephone about arranging for a prostitute to travel from New York to Washington, D.C.; and

y. On or about February 13, 2008, an Emperors Club prostitute traveled from New York, New York, to a hotel in Washington, D.C.

(Title 18, United States Code, Section 371.)

## COUNT TWO

6. From in or about December 2004, up through and including in or about March 2008, in the Southern District of New York and elsewhere, MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, and others known and unknown, unlawfully, willfully, and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1956.

7. It was a part and an object of the conspiracy that MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, the use of facilities in interstate commerce with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit, a business involving prostitution offenses in violation of applicable State law, in violation of Title 18, United States Code, Section 1952(a)(3); interstate transportation of individuals to engage in prostitution, in violation of Title 18, United States Code, Section 2421; and persuasion of individuals to travel in interstate and foreign commerce to engage in prostitution, in violation of Title 18, United States Code, Section 2422(a), (a) with the intent to promote the carrying on of specified unlawful activity, and (b) knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

## Overt Acts

8. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about December 10, 2004, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, opened a bank account in the name of "QAT Consulting Group, Inc.";

b. In or about November 30, 2006, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, opened a bank account in the name of "QAT International, Inc.";

c. From in or about December 2004 to in or about January 2008, MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, received more than \$1 million in proceeds from the Emperors Club prostitution business in bank accounts in the names of "QAT Consulting Group, Inc.," and "QAT International, Inc.";

d. From in or about December 2004 to in or about January 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, wrote more than \$100,000 in checks to cash from bank accounts in the names of "QAT Consulting Group, Inc.," and "QAT International, Inc.";

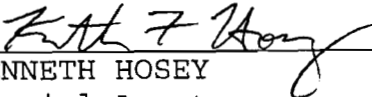
e. From in or about December 2004 to in or about January 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, wrote more than \$39,000 in checks to Protech Consultants, a company whose bank account MARK BRENER, a/k/a "Michael," the defendant, controlled; and

f. From in or about December 2004 to in or about January 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, wrote checks and sent wire transfers totaling more than \$400,000 from bank accounts in the name of "QAT Consulting Group, Inc.," and "QAT International, Inc.," to more than 50 prostitutes working with the Emperors Club in the United States and Europe.

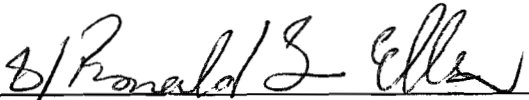
(Title 18, United States Code, Section 1956(h).)

9. The bases for my knowledge and for the foregoing charges are, in part, set forth in the attached Affidavit of Kenneth Hosey in support of the Application for Arrest Warrants, Search Warrants, and Seizure Warrants, which is incorporated by reference herein.

WHEREFORE, deponent prays that warrants be issued for the arrests of the above-named defendants so that they may be imprisoned or bailed, as the case may be.

  
KENNETH HOSEY  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
5 day of March, 2008.

  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

REDACTED

IN THE MATTER OF THE APPLICATION

SEALED

OF THE UNITED STATES OF AMERICA

AFFIDAVIT IN SUPPORT

FOR ARREST WARRANTS, SEARCH

OF APPLICATION FOR

ARREST WARRANTS,

WARRANTS, AND SEIZURE WARRANTS

SEARCH WARRANTS, AND

SEIZURE WARRANTS

STATE OF NEW YORK )

COUNTY OF NEW YORK : ss.:

SOUTHERN DISTRICT OF NEW YORK )

KENNETH HOSEY, being duly sworn, deposes and says:

I. INTRODUCTION

1. I have been a Special Agent with the Federal Bureau of Investigation ("FBI") for approximately twelve years. During that period, I have participated in investigations involving surveillance, undercover transactions, the introduction of undercover agents, debriefings of informants, and reviews of recorded conversations and documents. I have also participated in numerous arrests.

2. I make this Affidavit in support of the following applications:

a. An application for warrants to arrest MICHAEL BRENER, a/k/a "Michael," CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," and TANYA HOLLANDER, a/k/a "Tania Hollander," the defendants;

b. An application for warrants to search the following premises:

(i)

<sup>1</sup> Because this location is in the District of New Jersey, I will be requesting the search warrant from a United States Magistrate Judge for the District of New Jersey.

(ii) [REDACTED]  
[REDACTED]

(iii) [REDACTED]  
[REDACTED]

c. An application for seizure warrants for the following:

(i) All funds in [REDACTED]  
[REDACTED]

(ii) [REDACTED]  
[REDACTED]

(iii) [REDACTED]  
[REDACTED]

(iv) [REDACTED]  
[REDACTED]

(v) [REDACTED]  
[REDACTED]

3. I have been involved in the investigation of this case. This Affidavit is based upon, among other things, my personal participation in this investigation, my conversations with other law enforcement officers who have participated in this investigation, my review of court-authorized wire and electronic communications and e-mails recovered from search warrants, my review of bank records and other documents, and my participation in physical surveillance. Because this Affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during this investigation. Where I report statements made by others, those statements are reported in substance and in part.

4. As explained in more detail below, there is probable cause to believe that the defendants are organizers and managers of a criminal organization engaged in illegal prostitution and money-laundering activities throughout the United States and Europe.

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<sup>2</sup> Because this location is in Brooklyn, New York, I will be requesting the search warrant from a United States Magistrate Judge in the Eastern District of New York.

## II. THE EMPERORS CLUB'S PROSTITUTION CRIMES

### A. Overview

5. In or about October 2007, the FBI and the United States Internal Revenue Service-Criminal Investigative Division ("IRS-CID") began an investigation focusing on an organization suspected of conducting prostitution and money-laundering crimes in the United States and Europe. Through the investigation, the FBI and IRS have determined that MARK BRENER, a/k/a "Michael," CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," and TANYA HOLLANDER, a/k/a "Tania Hollander," the defendants, organized, managed, and operated the Emperors Club VIP ("Emperors Club"), an international criminal organization engaged in illegal prostitution and money-laundering activities. BRENER, SUWAL, LEWIS, and HOLLANDER used the Emperors Club to arrange for prostitution activity between wealthy male clients and more than 50 prostitutes in, among other places, New York, New York; Washington, D.C.; Los Angeles, California; Miami, Florida;<sup>3</sup> London, England; and Paris, France. The defendants charged the Emperors Club's clients fees ranging from \$1,000 to more than \$5,500 per hour for prostitution services.

6. Through the Emperors Club, MARK BRENER, a/k/a "Michael," CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," and TANYA HOLLANDER, a/k/a "Tania Hollander," the defendants, received more than \$1 million in illicit proceeds from their international prostitution business. BRENER, SUWAL, LEWIS, and HOLLANDER accepted payment

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<sup>3</sup> At all times relevant to this Affidavit, New York State law made it a crime when a person "engages or agrees or offers to engage in sexual conduct with another person in return for a fee." NY CLS Penal § 230.00. Similarly, District of Columbia law made it a crime for "any person to engage in prostitution or to solicit for prostitution," which is defined as "a sexual act or contact with another person in return for giving or receiving a fee," D.C. Code § 22-2701; California law made it a crime for a person to "pay money or other valuable thing for, any person for the purpose of prostitution," which is defined to include "any lewd act between persons for money or other consideration," California Penal Code §§ 266(e), 647; and Florida law made it a crime to commit or solicit prostitution, which is defined as "the giving or receiving of the body for sexual activity for hire," Florida Statutes § 796.07.

from their clients in the form of cash, American Express charges, wire transfers, and money orders. To conceal the nature of the Emperors Club prostitution business, MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, received prostitution proceeds in United States bank accounts in the names of front companies, including QAT Consulting Group, Inc. and QAT International, Inc.

7. As demonstrated below, the evidence obtained during this investigation includes, among other things, statements of a confidential source who worked with the Emperors Club; statements of an undercover officer; more than 5,000 telephone calls and text messages intercepted pursuant to court-authorized wiretaps; more than 6,000 e-mails recovered pursuant to court-authorized search warrants; bank records; travel and hotel records; and physical surveillance.

8. The evidence has established that the four defendants played different roles with respect to the criminal activities of the Emperors Club:

a. MARK BRENER, a/k/a "Michael," the defendant, was the leader of the Emperors Club. BRENER had the ultimate decision-making authority over the Emperors Club. BRENER recruited prospective prostitutes, determined how to market the Emperors Club's prostitutes to clients, and resolved problems that arose with the Emperors Club's clients and prostitutes.

b. CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, was the day-to-day organizer of the Emperors Club's operations. SUWAL controlled the Emperors Club bank accounts, supervised the Emperors Club's booking agents, and received applications from the Emperors Club's prospective prostitutes.

c. TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," and TANYA HOLLANDER, a/k/a "Tania Hollander," the defendants, were booking agents for the Emperors Club. LEWIS and HOLLANDER took requests over the telephone from the Emperors Club's clients for prostitution services, coordinated over the telephone with the Emperors Club's prostitutes to carry out acts of prostitution, and referred issues relating to payment for prostitution services to CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant.

#### B. The CS

9. I have spoken with another law enforcement officer who has been involved in the investigation of a number of prostitution businesses in the New York City area. The law

enforcement officer informed me that in the end of 2006 he spoke with a confidential source (the "CS") who had worked as a prostitute in New York City. The CS was immunized from prosecution as a result of her cooperation with law enforcement. In addition, the law enforcement officer with whom I spoke confirmed that the CS had provided information that was reliable and corroborated by independent evidence. The CS told the law enforcement officer that during 2006 she worked for the Emperors Club as a prostitute.

10. In an effort to further corroborate the information provided by the CS, I have reviewed bank records for a [REDACTED] bank account [REDACTED] in the name of QAT Consulting Group, Inc. (the "First QAT Account"). According to the bank records, in 2006, the CS in fact received a check for more than \$1,000 from the First QAT Account. As discussed in further detail below, the defendants have directed clients of the Emperors Club to make payments for prostitution services to the First QAT Account, and also to a second bank account at [REDACTED] bank account [REDACTED] in the name of QAT International, Inc. (the "Second QAT Account").

#### C. The Undercover

11. In the course of this investigation, I have worked with an agent acting in an undercover capacity (the "Undercover"). The Undercover posed as a potential client of the Emperors Club prostitution business, and made arrangements over the telephone with TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, for an appointment with an Emperors Club prostitute. He then coordinated over e-mail with CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, to make a deposit of more than \$1,000 towards the appointment in the Second QAT Account.

12. The Undercover initially went on the Internet and accessed a website located at URL [www.emperorsclubvip.com](http://www.emperorsclubvip.com). (the "Website"). The Website included photographs of Emperors Club prostitutes' bodies, with their faces hidden, along with hourly rates for different categories of prostitutes. The Website ranked the prostitutes using a ranking system from one to seven diamonds, and charged hourly rates according to the assigned ranking. For example, according to the Website, the Emperors Club charged \$1,000 per hour for a three-diamond prostitute, and \$3,100 per hour for a seven-diamond prostitute. The Website offered the Emperors Club's most valued clients "membership" in the "Icon Club," a status which allowed the clients to access restricted areas of the Website and permitted them to schedule appointments for illegal prostitution services with the most highly-ranked prostitutes whose fees started at \$5,500 per hour.

According to the Website, in certain circumstances, the Emperors Club also offered its clients the opportunity to exercise a "buy-out clause," which permitted them to purchase direct access to one of the Emperors Club's prostitutes without having to contact the agency. The Website listed (212) 812-2114 (the "2114 Number") as one of the numbers for clients to use to contact the Emperors Club.<sup>4</sup>

13. On or about October 20, 2007, at approximately 9:30 p.m., the Undercover placed a call to the 2114 Number, which I have determined from toll records was forwarded to a cellular telephone assigned call number [REDACTED] 6587 (the "6587 Number"). The call was answered by TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant.<sup>5</sup> During the conversation, the Undercover and LEWIS discussed an appointment the Undercover wanted to arrange for October 25, 2007. The Undercover explained that he was hoping to have a "good night" for himself. LEWIS asked the Undercover which particular woman he wanted to see, to which the Undercover responded that all the women on the Website were "beautiful." The Undercover requested an appointment with "Helena" - one of the women depicted on the Website - but LEWIS told him that "Helena" was "based in London." The Undercover then asked for an appointment with "Drew," to which LEWIS

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<sup>4</sup> As discussed below, I have determined that telephone calls placed to the 2114 Number were typically forwarded to various cellular telephones used by CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," and TANYA HOLLANDER, a/k/a "Tania Hollander," the defendants.

<sup>5</sup> My belief that the person using the 6587 Number in this and other calls summarized above was LEWIS is based on the following: First, an IRS-CID agent working on this case has reviewed bank records for the First QAT Account for the period December 10, 2004, through January 2008. The IRS-CID agent has determined that during this time period approximately \$53,473.00 worth of checks were written from the First QAT Account to "Rachelle Lewis," a portion of which were negotiated through an account at [REDACTED] in the name of [REDACTED]. According to records obtained from [REDACTED] the current address for the account holder of the [REDACTED] account is [REDACTED]. On February 28, 2008, another law enforcement officer spoke with LEWIS, who identified herself as "Tameka Lewis," and saw her enter [REDACTED] at [REDACTED]. Second, during calls intercepted over the 6587 Number, LEWIS consistently identified herself over the telephone as either "Rachelle" or "Temeka."

responded that "Drew" was based in New York, but had very limited availability. The Undercover stated that he was looking for someone who was "physically very attractive" and had a "fun personality."<sup>6</sup> LEWIS stated that, based on the women the Undercover had identified, it sounded like the Undercover was not necessarily interested in "that model look," but maybe someone "a little curvier than a model." After the Undercover agreed, LEWIS said that "Drew" was a "great choice." If "Drew" was not available, LEWIS said she would recommend "Raquel," whom she described as a "brunette" who was "beautiful . . . All-American . . . very clean, . . . very fresh." She explained that "Raquel" and "Drew" had "similar body types," though "Raquel" was "probably a little bit bustier on top." LEWIS told the Undercover that for "Drew" there was a "two-hour, introductory rate" of \$2,000, and that "Raquel's" hourly rate was \$1,500 for the first two hours, with a discount to \$1,200 for the third hour. The conversation ended with the Undercover asking LEWIS for a follow-up call to confirm the arrangements, which LEWIS promised to do. LEWIS further stated that she could be reached at either the "212 number" (believed to be a reference to the 2114 Number) or the "347 number" (believed to be a reference to the 6587 Number), and that the Undercover could always reach her directly at the "347 number."

14. On or about October 22, 2007, at approximately 2:33 p.m., the Undercover received a call from TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant. During the call, LEWIS and the Undercover confirmed an appointment for the Undercover to meet "Raquel." LEWIS told the Undercover that he would have to meet "Raquel" at a "private location just . . . for the beginning of the appointment . . . where she would collect the fee," and suggested that they meet at "a hotel or a private home." The Undercover asked if there was another way he could handle the payment of the fee, and LEWIS responded that he could either "pay cash," use his American Express card, or pay by wire transfer. The Undercover expressed a preference for a wire transfer, and LEWIS told him she would send him the necessary information, asking if she could send it to him by text message.

15. On or about October 22, 2007, at approximately 3:24 p.m., the Undercover called the 2114 Number, which was

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<sup>6</sup> The Undercover also stated that, in the long term, he wanted to discuss "other things" with LEWIS, such as, hiring a group of women to entertain his clients. LEWIS said that "certainly could be arranged," and that "our models are the types of women who can handle themselves well in any situation."

forwarded to another cellular telephone, and spoke to TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant. During the call, LEWIS stated that she had spoken to "the office," and that they preferred to send him the wire transfer information by e-mail. The Undercover provided LEWIS with his e-mail address.

16. The Undercover subsequently received an e-mail from an e-mail address identified as "reservations@emperorsclubvip.com." The e-mail provided the Undercover with instructions for paying his fee by wire transfer and was signed by "Katie," which I believe to be an alias used by CECIL SUWAL, the defendant. In the e-mail, "Katie" identified the Second QAT Account as the bank account where the Undercover should send his wire transfer. The Undercover later wire transferred more than \$1,000 to the Second QAT Account.<sup>7</sup>

17. On or about November 29, 2007, at approximately 3:47 p.m., the Undercover called TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, on the 6587 Number. During the call, the Undercover asked to reschedule his appointment with "Raquel." LEWIS told the Undercover that "Raquel" had moved back to Los Angeles, California. The Undercover then asked if "Raquel" would travel back from California to New York to be with him. LEWIS stated that "Raquel" would travel, but it would have to be a lengthy appointment. LEWIS told the Undercover that she would have to check with "Raquel" about her availability. During a later call on November 29, 2007, over the 6587 Number, LEWIS confirmed to the Undercover that Raquel would travel to New Jersey for an appointment with the Undercover.

#### D. The Intercepted Communications And Seized E-Mails

18. Based in part on the information provided by the CS and the Undercover, described above, on or about January 8, 2008, the Honorable Charles S. Haight, United States District Judge for the Southern District of New York, authorized the interception of telephone calls and text messages over the 6587 Number. On or about February 7, 2008, authorization expired, but was renewed on or about February 11, 2008, by the Honorable Gerard E. Lynch. On or about January 23, 2008, based in part on

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<sup>7</sup> The Undercover later told TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, that he had to reschedule his October 25, 2007, appointment. As discussed above, the FBI relied on the Undercover's recorded conversations with LEWIS, among other evidence, to support an application for court authorization to wiretap the 6587 Number.



communications intercepted over the 6587 Number, the Honorable Leonard B. Sand, United States District Judge for the Southern District of New York, authorized the interception of telephone calls and text messages over the cellular telephone assigned call number [REDACTED] 3390 (the "3390 Number"), which was used by CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," and MARK BRENER, a/k/a "Michael," the defendants, to operate the Emperors Club and to make strategic decisions regarding its prostitution and money-laundering activities. On or about February 21, 2008, the Honorable Lawrence M. McKenna, United States District Judge for the Southern District of New York, re-authorized the interception of telephone calls and text messages over the 3390 Number. To date, the FBI has intercepted more than 5,000 telephone calls and text messages over the 6587 Number and the 3390 Number.

19. On or about January 25, 2008, based on wiretap interceptions and other evidence developed during the investigation, the FBI obtained a search warrant from the Honorable Gabriel W. Gorenstein, United States Magistrate Judge for the Southern District of New York, for the content of the e-mail account entitled "emperorsclubvipny@yahoo.com" (the "Emperors Club E-Mail Account"), which was used primarily by MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, to recruit new prostitutes for the Emperors Club. As a result of the search warrant, the FBI obtained more than 6,000 e-mails relating to the Emperors Club's operations.

20. The intercepted telephone calls and text messages, combined with the recovered e-mails, demonstrate that MARK BRENER, a/k/a "Michael," CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," and TANYA HOLLANDER, a/k/a "Tania Hollander," the defendants, collectively managed the prostitution activities of the Emperors Club. These intercepted wire and electronic communications also confirmed that the defendants were, among other things: (1) making various strategic decisions regarding the Emperors Club's criminal operations; (2) using cellular telephones and e-mail to promote prostitution in the United States and Europe; and (3) conspiring with certain clients to transport prostitutes interstate for the purposes of prostitution.

#### 1. The Emperors Club's Operational Issues

21. During a number of intercepted telephone calls the text messages, and recovered e-mails, the defendants discussed various strategic issues relating to the Emperors Club. These issues included relationships with the Emperors Club's clients,

the recruitment, marketing, and advertising of Emperors Club's prostitutes, hourly rates and other payment issues, and problems that arose with the Emperors Club's prostitutes and clients. A number of these intercepted telephone calls and text messages and recovered e-mails are summarized below.

a. The "Buy-Out" Option

22. On January 10, 2008, at approximately 8:44 p.m.,<sup>8</sup> MARK BRENER, a/k/a "Michael," the defendant,<sup>9</sup> using the 3390 Number, called TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, at the 6587 Number. During the call, BRENER and LEWIS discussed a business arrangement, which they referred to as a "buy-out," by which a client of the Emperors Club could "buy out" a prostitute, and thereby arrange appointments with her without having to go through the Emperors Club. At one point in the conversation, BRENER handed the telephone to CECIL SUWAL, a/k/a

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<sup>8</sup> All times are Eastern Standard Time unless otherwise indicated.

<sup>9</sup> My belief that the person using the 3390 Number in this and other calls summarized above, and using the telephone assigned call number [REDACTED] 0937 (the "0937 Number") in other calls summarized above, was BRENER is based on, among other things, the following: First, the 3390 Number and the 0937 Number are both subscribed to CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, at [REDACTED]. Time Warner Cable records reflect that the account of MARK BRENER also is registered to BRENER at the [REDACTED] address. Second, in intercepted calls over the 3390 Number and the 0937 Number, an individual referred to as "Michael" discussed traveling with SUWAL to meet with other co-conspirators. Other FBI agents then observed BRENER with SUWAL on surveillance meeting with other co-conspirators. Moreover, after a series of intercepted calls involving "Michael" and SUWAL, on January 28, 2008, I observed individuals resembling BRENER and SUWAL inside their [REDACTED] minivan near the vicinity of Grand Central Terminal in Manhattan. Also, a New York City Police Department Officer, at the FBI's request, identified the man driving the Honda Odyssey as BRENER. As a result, I believe that the "Michael" speaking over the 3390 Number and the 0937 Number during the course of the wiretaps was BRENER.

"Katie," a/k/a "Kate," the defendant,<sup>10</sup> who continued discussing the same subject with LEWIS; in particular, SUWAL and LEWIS discussed a specific client who had expressed interest in such an arrangement, and the fact that they needed to find out how much such an arrangement was worth for that client. SUWAL indicated that during a conversation the day before they had disregarded this client's potential for the "buy out." SUWAL then stated: "[O]n second thought . . . why would we completely disregard him. [I]f . . . maybe a good deal could come of it, . . . maybe it would come more [money] than . . . what we're currently seeing and receiving from him. So . . . when he calls asking for 'Raquel' [believed to be the alias of a prostitute], he wants to see her again, again, again, . . . you can always say, 'You know, you may be interested in privately dating her which is when . . . you contact her directly . . . and not necessarily going through the agency.'" (Call 865C).

b. Advertising

23. On January 12, 2008, at approximately 8:59 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called MARK BRENER, a/k/a "Michael," the defendant, at the 0937 Number. During the call, BRENER and LEWIS discussed the Emperors Club's prostitution operations in Los Angeles, California. LEWIS told BRENER: "I don't know if, if you're gonna

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<sup>10</sup> My belief that the person using the 3390 Number in this and other calls summarized above, and using the 0937 Number in other calls summarized above, was SUWAL is based on, among other things, the following: First, the 3390 Number and the 0937 Number are subscribed in the name "Cecil Suwal." Second, on January 17, 2008, there were calls between the 3390 Number and TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, on the 6587 Number, regarding meeting in New Jersey. Around the time of these calls, other FBI agents and I were following the [REDACTED] minivan and observed both MARK BRENER, a/k/a "Michael," the defendant, and a female I believed to be SUWAL inside. Another FBI agent then observed LEWIS enter the [REDACTED] with SUWAL and BRENER. Another FBI agent compared a driver's license photograph of SUWAL with the person who was inside the [REDACTED] and believed that the person was SUWAL. Third, during February 2008, the FBI intercepted calls over the 3390 Number during which the speaker said that she and "Michael," believed to be a reference to BRENER, were traveling to London. From law enforcement records, I have determined that during February 2008 SUWAL and BRENER in fact traveled to London under their true names.

be advertising but . . . it's just been really, really slow in LA . . . We have a lot of girls there now . . . we need calls." BRENER said that he understood, and thanked LEWIS. (Call 1507R).

c. Recruitment Of Prostitutes

24. On January 18, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, sent an e-mail from the Emperors Club E-Mail Account to a potential prostitute. In the e-mail, SUWAL stated: "It was a pleasure meeting you last night. If you are having trouble emailing the pictures perhaps we can just meet up, take them and then return them to you the next day after we scan them into the computer. You can also feel free to email any that are 'email-able' now. . . ."

25. On January 24, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, received an e-mail at the Emperors Club E-Mail Account from a potential prostitute. In the e-mail, the potential prostitute wrote:

Hi, I have just spoke to a friend of mine who done [sic] her first job for you . . . Unfortunately I wasn't very happy to find out that its only 500 ph + over 50% commission fees . . . I was aware of 50% but didn't know the price was 500 . . . This is a kind of money I make very easily in photoshoots and the reason I wanted to join your site to make an extra money . . . The other think [sic] I was little bit shock and confuse that she had a sex with him twice in an hour and without her [sic] taking her out for dinner before. . So I am very sorry I don't think this is my kind of thing. I was told by your assistant in London this is more like a dating agency than an escort. But to provide sex for £500 an hour, I just thing [sic] this is not a price I would ever consider of doing it for. .

d. Marketing

26. On January 19, 2008, MARK BRENER, a/k/a "Michael," the defendant, using the 0937 Number, called TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, at the 6587 Number. During the call, BRENER asked LEWIS if his "intervention" was needed regarding the unavailability of a girl for an Emperors Club client in Miami, Florida. LEWIS told BRENER no, and listed three prostitutes who were working in Miami. BRENER commented that one of the prostitutes "looks like [a] butcher in my opinion," and told LEWIS that he was not sure if LEWIS could

"market this girl." BRENER and LEWIS then discussed the other two Miami-based prostitutes. BRENER asked LEWIS if the Miami client sounded like a rich person, and BRENER indicated that he was thinking of offering the client "membership." BRENER commented: "[I]f he's rich guy . . . we send or fly somebody to them, right?" BRENER and LEWIS then discussed coaching another prostitute, and LEWIS suggested that "Katie," a reference to CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, should call her. LEWIS stated that she doubted that the prostitute they were discussing would ever be an "Icon" model. (Call 2344R).

27. On February 11, 2008, at approximately 12:53 p.m., CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, using the 3390 Number, sent a text message to TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, at the 6587 Number, stating: "[C]hrissy is at \$2100/hr." (Call 3582C). LEWIS responded: "New pix or same ones?" (Call 3585C). SUWAL stated: "Same ones . . . she'll have new ones soon but so far the ones she 1st gave are the best." (Call 3588C). LEWIS responded: "Ok." (Call 3598C). SUWAL, using the 3390 Number, sent another text message to LEWIS at the 6587 Number, stating: "[S]omeone asked what her 3 day rate was. I told him about 50,000 & that emilys was about 35,000 in case he calls." (Call 3594C). LEWIS replied: "Ok." (Call 3598C).

e. Availability Of Prostitutes

28. On January 18, 2008, at approximately 5:41 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from a new prostitute working with the Emperors Club. LEWIS and the new prostitute discussed an upcoming date that LEWIS had scheduled for her in Los Angeles, California. The new prostitute told LEWIS that she had talked to "Katie," a reference to CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, but she had never done anything like this before and was a little bit nervous about it. LEWIS said that she would let the client know that this was her first appointment, and indicated that "Katie" could best answer how to handle oneself on an appointment. The new prostitute was concerned because she wanted to be more anonymous, and did not want to be pictured on the Website in part because of her family background. LEWIS told the new prostitute that it was in her interest to have pictures on the Website, and commented: "There are some pictures where I think that even if you knew who the person was, you couldn't really identify [them]." LEWIS suggested that when "Katie" cropped the pictures, she should tell "Katie" that she did not want anything above the chin. The new prostitute and LEWIS discussed the possibility of the new prostitute becoming an

"Icon" model with Emperors Club. (Call 2207R).

29. At approximately 5:51 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, using the 0937 Number. During the call, LEWIS referred to the conversation she had earlier with the new prostitute. LEWIS stated that she did not know why the new prostitute was even considered because she was "clueless" and "looking . . . to be on Icon portfolio." SUWAL stated: "[W]e don't even know if we can charge 1200 [let alone] 5000." SUWAL suggested that LEWIS emphasize to the client that it was the new prostitute's first date. (Call 2212R).

30. At approximately 7:05 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from an Emperors Club client based in Los Angeles, California. LEWIS and the client discussed an appointment between the client and the new prostitute, whom LEWIS referred to as "Felana." LEWIS claimed that she was waiting to hear back from "Felana," but cautioned the client that this would be her first appointment. The client responded: "Sounds great to me." LEWIS stated: "What your expectations are might not be fulfilled just because it's just her very first appointment ever." The client said that he would "take [his] chances." LEWIS described another prostitute whom the Emperors Club marketed as "Samantha" to the client, stating that she was a professional model, 5 feet 9 inches tall, 115 pounds, and in her early 20s. The client stated that if "Felana" was unavailable, he would see "Samantha" later in the week. (Call 2226R).

31. On or about January 24, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, sent an e-mail from the Emperors Club E-Mail Account to TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, at the e-mail address [REDACTED]

<sup>11</sup> The subject line for this e-mail was "Most Updated Version!", and SUWAL attached a list of the aliases used by more than 50 prostitutes, including those designated as "Icons," working with the Emperors Club in, among other places, New York, New York; Los Angeles, California; Miami, Florida;

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<sup>11</sup> My belief that LEWIS was using the e-mail address [REDACTED] is based on the fact that, according to information another law enforcement officer obtained from HSBC bank, when LEWIS opened her account at [REDACTED] bank, she provided the [REDACTED] e-mail address as part of her contact information.

London, England; and Paris, France.

32. On or about January 30, 2008, at approximately 9:55 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, at the 0937 Number, to discuss problems with one of the Emperors Club's prostitutes in Los Angeles. During the call, LEWIS explained to BRENER that the prostitute missed an appointment, and had left a "crazy text" for her last night. LEWIS told BRENER that he might not want to send the prostitute out any more. BRENER and LEWIS discussed the possibility that the prostitute was on drugs. SUWAL, speaking in the background, commented that there was an "elephant standing in the living room" with respect to the prostitute's actions. BRENER agreed that LEWIS could not do business with the prostitute the way she was acting. LEWIS commented that it seemed that "a lot of these girls deteriorate to this point." (Call 4554R).

33. On January 30, 2008, at approximately 1:46 p.m., CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, using the 3390 Number, sent a text message to TANYA HOLLANDER, a/k/a "Tania Hollander",<sup>12</sup> the defendant, at the cellular telephone assigned call number [REDACTED] 1627 (the "1627 Number"). In the text message, SUWAL told HOLLANDER: "[Client] would like to meet someone in nyc feb 1<sup>st</sup> @ 6pm. Pls call him @ [Client's number]." (Call 849C). Later that day, at approximately 7:24 p.m., SUWAL, using the 3390 Number, sent HOLLANDER another text message at the 1627 Number. In the text message, SUWAL told HOLLANDER: "Pls send madison & trina in ny if possible. They're new & in order to absorb them we have to give them some work." (Call 885C). Approximately five minutes later, at approximately 7:29 p.m., HOLLANDER responded by sending a text message from the 1627 Number to SUWAL at the 3390 Number, stating: "Of course." (Call

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<sup>12</sup> My belief that HOLLANDER was the person using the 1627 Number in this and other intercepted calls and text messages summarized above is based on the following: First, during intercepted calls over the 1627 Number, HOLLANDER consistently is referred to as "Tanya." Second, on January 28, 2008, after a series of intercepted calls over the 1627 Number where the "Tanya" on the telephone agreed to meet with CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," and MARC BRENER, a/k/a "Michael," the defendants, another agent and I observed a woman we believed to be HOLLANDER in the vicinity of the [REDACTED] minivan with SUWAL and BRENER inside. Finally, checks SUWAL has written from the First QAT Account have been made out to "Tanya Hollander."

887C).

34. On February 10, 2008, at approximately 6:26 p.m., CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, using the 3390 Number, called TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, at the 1627 Number. During the call, SUWAL asked HOLLANDER if she was ever able to reach the Emperors Club client who "Madison" saw. HOLLANDER said that she called two times, but he never called back. SUWAL stated that he was a new client, and she stayed for just 40 minutes. SUWAL continued: "We're thinking that there's a chance that the reason she stayed 40 minutes 'cause we just found out the other day that she has children and she went to pick them up from school immediately afterwards . . . I don't know if . . . she intentionally cut it short . . . to pick up her children . . . but, as a general rule, the girls who have children tend to have . . . a little more baggage going on." HOLLANDER stated that she did not know who "Madison" checked in with, but HOLLANDER told her several times to call HOLLANDER once at the room and then that HOLLANDER would call her at the end of the hour. HOLLANDER said that she was finally about to reach her, and found out later that she had left. SUWAL indicated that it was a problem if she was "cutting it short." (Call 3537C).

f. Hourly Rates

35. On January 25, 2008, at approximately 12:49 p.m., MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, using the 3390 Number, called a prostitute using the name "Sophie" at a number in London, England. During the call, SUWAL told "Sophie" that she had received "Sophie's" e-mail in which "Sophie" stated that she was not comfortable with the payment she had received. SUWAL told "Sophie" that they would try to raise "Sophie's" "rate." "Sophie" stated that she could not speak openly because she was in a "public area," but asked what kind of "charges do the other girls charge?" SUWAL indicated that the rates ranged from 500 [British pounds] to "very high rates." SUWAL told "Sophie" that someone named "Michael," a reference to BRENER was there to speak with her. SUWAL put BRENER on the telephone with "Sophie." BRENER told "Sophie" that their goal in recruiting people was to bring them to the point where they could join "Icon models." BRENER continued that it was "much more pleasant for us to split \$5,000 than \$1,200 or whatever." SUWAL got back on the telephone. "Sophie" told SUWAL that she thought that in time she could join "Icon," and SUWAL told "Sophie" that they would raise her rate. (Call 329C).



g. Payment

36. On or about February 4, 2008, at approximately 11:05 a.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, using the 3390 Number. During the call, SUWAL and LEWIS discussed the fact that some of the Emperors Club prostitutes were not properly taking imprints of the clients' American Express cards. SUWAL told LEWIS to ask the prostitutes to fax the imprints, or if that did not work to scan them and e-mail the imprints, and then send the originals in the event of a dispute with the clients about the charge, or if American Express inquired. MARK BRENER, a/k/a "Michael," the defendant, commented in the background that he thought one of the prostitutes ignored him when he told her how to fill out the credit card slips. SUWAL complained about a fax of a credit card slip she received from a prostitute, and stated: "[I]f American Express were to ask to see that, as a legitimate business, you can't even deliver something like that." (Call 6538R).

2. The Emperors Club's Domestic Prostitution Operations

37. During a number of intercepted telephone calls and text messages, the defendants made arrangements for acts of prostitution in the United States, including in, among other cities, New York, New York; Los Angeles, California; and Miami, Florida. A number of these telephone calls and text messages are summarized below.

a. New York, New York

i. January 12 and 13, 2008

38. On January 12, 2008, at approximately 4:59 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, spoke over the telephone with an Emperors Club client ("Client-1"). During the call, LEWIS told Client-1 that a prostitute the Emperors Club marketed using the alias "Kristen" was available at 9:00 p.m. the following day. Client-1 said fine. LEWIS stated that "Kristen" was new so she did not have images up, and that her hourly rate was \$1,000. Client-1 told LEWIS that he would be staying at a hotel downtown. LEWIS told Client-1 to let her know his room number after he checked in. (Call 1467R).

39. On January 13, 2008, at approximately 3:29 p.m.,

Client-1 called TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, at the 6587 Number. Client-1 told LEWIS that he had checked in at the hotel, and that his room number was 2006. LEWIS confirmed the location of the hotel, and told Client-1 that everything was set for 9 p.m. (Call 1556R).

40. On January 13, 2008, at approximately 8:59 p.m., "Kristen" sent a text message to TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, at the 6587 Number. In the text message, "Kristen" stated: "I am going to be late. It is pouring rain, and I couldn't find my little pocket book with all my slips! This is a cash appt, so I hope this is not a problem. . ." (Call 1593R). Approximately two minutes later, LEWIS, using the 6587 Number, sent "Kristen" a text message, stating: "Ok. It's a cash appt. Will let client know ur running late. R." (Call 1597R). Immediately thereafter, LEWIS, using the 6587 Number, called the hotel, and was connected to room 2006. LEWIS then spoke with Client-1, and told him that "Kristen" was running a little late due to rain and traffic. LEWIS stated that "Kristen" would be there by 9:15 p.m. (Call 1598).

41. At approximately 9:15 p.m., "Kristen" called TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, at the 6587 Number. "Kristen" told LEWIS that she was there, and that everything was okay. LEWIS told "Kristen" that she would call her in an hour. (Call 1608R). At approximately 10:17 p.m., LEWIS, using the 6587 Number, sent "Kristen" a text message, stating: "It's been an hr. Pls call." (Call 1612R). Approximately one minute later, at approximately 10:18 p.m., "Kristen" sent a text message to LEWIS at the 6587 Number, stating: "I am walking out now. Xo." (Call 1613R).

ii. January 15, 2008

42. On January 15, 2008, at approximately 7:38 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from an Emperors Club client ("Client-2"). During the call, Client-2 said that he was looking for a girl tonight at 11 p.m. at a hotel in New York, New York. Client-2 told LEWIS that he has used the service before. LEWIS told Client-2 that she believed that a prostitute who the Emperors Club marketed using the name "Emily" was available, and also discussed two other Emperors Club prostitutes with Client-2. LEWIS told Client-2 that she would make some calls and get back to him. (Call 1809R).

43. At approximately 8:04 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, spoke

with "Emily." During the call, LEWIS offered "Emily" two appointments: the first for one hour with a client who had used the service before, liked model types, and was easy; the second for multiple hours with a client who was a "partier." "Emily" said she had a casting this week, so the one-hour appointment would be best. (Call 1840R).

44. Approximately two minutes later, at 8:08 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from Client-2. LEWIS confirmed that "Emily" would be available at 11 p.m. LEWIS described "Emily" as a professional model, 23 years old, with strawberry blonde hair and fair skin, 5 feet 9 inches tall, and 116 pounds, with an hourly rate of \$1,500. Client-2 said he was in room number 1916. (1843R).

45. At approximately 8:42 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, sent a text message to CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, at the 3390 Number. In the text message, LEWIS listed the three appointments she was working on, including the 11 p.m. appointment between Client-2 and "Emily." (1876R).

46. At approximately 10:53 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from "Emily." During the call, "Emily" stated that she was "there" (believed to be a reference to the fact that she had arrived at the appointment with Client-2). (Call 1918R).

b. Los Angeles, California

i. January 22-24, 2008

47. On January 22, 2008, at approximately 11:28 a.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from an Emperors Club client ("Client-3"). During the call, LEWIS told Client-3 that a prostitute that the Emperors Club marketed using the name "Samantha" would be available on Thursday [January 24, 2008] at 3:30 p.m. Client-3 said that he would make hotel arrangements. Client-3 indicated that he would pick a hotel on the west side of Los Angeles so that it was convenient for him. LEWIS told Client-3 that because of a "new policy," the Emperors Club would require a 55% deposit for his date with "Samantha." Based on other calls intercepted in this case, I believe that the reason LEWIS asked Client-3 for a 55% deposit was because the Emperors Club was having problems collecting money from "Samantha," who they believed might be abusing drugs. Client-3 stated: "What?"

LEWIS explained that "[t]he office would just e-mail you the financial details so that you could either do a wire transfer or . . . a direct deposit." Client-3 responded: "A wire transfer from my bank?" LEWIS said yes, or a direct deposit into [REDACTED] bank. Client-3 asked whether direct deposit meant going to the bank himself, and LEWIS confirmed that it did. LEWIS said that most clients did wire transfers, and Client-3 stated: "I don't really like either one . . . ah . . . and, to whom does it get paid?" LEWIS stated: "It's to QAT Consulting, so it's a consulting firm . . . I mean it shows up like as a business transaction." Client-3 told LEWIS that it was getting harder and harder to do business with 'them' [a reference to the Emperor's Club]." (Call 2690R).

48. On January 22, 2008, at approximately 12:04 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, sent a text message to CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, at the 3390 Number. In the text message, LEWIS told SUWAL: "Pls send [Client-3] the info needed to make 55% deposit. His e-mail is [Client-3's e-mail address]." (Call 2698R). Later that day, at approximately 4:30 p.m., LEWIS, using the 6587 Number, received a call from Client-3. During the call, Client-3 stated that he did the wire transfer for "\$1500." Client-3 told LEWIS that the appointment would be at a particular hotel in Santa Monica, [California], at 3:30 p.m. (Pacific Standard Time ("P.S.T.")). LEWIS told Client-3 that she had confirmed everything with "Samantha," and told Client-3 to provide his room number when he checked in. Client-3 asked whether he could pay the difference to "Samantha" if he wanted to extend, and LEWIS said he could. (Call 2761R).

49. On January 24, 2008, at approximately 6:06 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from Client-3. During the call, Client-3 told LEWIS that he was in room 506, and described where the elevators were. Client-3 said that he should be ready at 3:30 p.m. P.S.T. (Call 3426R).

50. At approximately 6:38 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called "Samantha." LEWIS told "Samantha" that she had a problem with her telephone earlier, "Samantha" said she was driving there now. (Call 3485R). One minute later, at approximately 6:39 p.m., LEWIS, using the 6587 Number, called Client-3, and told him that "Samantha" would be there in five to ten minutes. (Call 3486R).

51. At approximately 6:56 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received

a call from "Samantha," who told LEWIS that she was there. LEWIS said it was room 506, and told her where the elevators were. (Call 3489R). Approximately three minutes later, at approximately 6:59 p.m., LEWIS, using the 6587 Number, called "Samantha." LEWIS told her: "I forgot to tell you, you're 'Samantha.'" "Samantha" said okay, and that she had just walked in and "everything's great." (Call 3497R).

52. Approximately two hours later, at approximately 8:59 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called Client-3. LEWIS asked Client-3 how his meeting was, and Client-3 said it was great. Client-3 and LEWIS then discussed a new prostitute on the Website. (3527R).

ii. January 26-27, 2008

53. On January 26, 2008, at approximately 8:05 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from an Emperors Club client ("Client-4") in Los Angeles, California. During the call, Client-4 said that he was staying in Los Angeles, and wanted to know if there was anyone available on short notice for 9:30 p.m. (P.S.T.) that evening. LEWIS and Client-4 discussed various Emperors Club prostitutes as possibilities. (Call 3915R).

54. At approximately 9:41 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called Client-4. LEWIS told Client-4 that "Raquel" was not available, but that "Chrissy" would be. LEWIS said that "Chrissy" was new to the agency, had four stars, and a rate of \$1,200 per hour. Client-4 said perfect. LEWIS told Client-4 she would try to make the appointment for 9:00 or 9:30 p.m. (Call 3931R). At approximately 9:52 p.m., LEWIS, using the 6587 Number, sent a text message to "Chrissy" on her cellular telephone. In the text message, she stated: "[Client-4's name], [Hotel] Beverly Hills . . . Room 467 9:30pm 1hr. 1380 credit Client may extend." (Call 3934R).

55. On January 27, 2008, at approximately 12:05 a.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from Client-4. Client-4 said that he just got back to the hotel room and pulled up the Website. Client-4 asked: "Who are we looking at?" LEWIS said it was "Chrissy," and explained that she had misquoted "Chrissy's" rate at \$1,200 per hour because she was actually five diamonds which meant a rate of \$1,500 per hour. Client-4 and LEWIS negotiated

the rate for "Chrissy," and ultimately agreed that Client-4 would pay \$305 in cash and charge \$1,300 on his credit card. (Call 3947R). At approximately 12:14 a.m., LEWIS, using the 6587 Number, sent a text message to "Chrissy," stating: "305 cash 1300 credit." (Call 3954R).

56. On January 27, 2008, at approximately 1:40 a.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called Client-4. LEWIS asked Client-4 how the appointment was. Client-4 said "two A+s in a row...I don't know where you get these young ladies . . ." Client-4 asked if there was any "traceability," and added that he could "get it past my accountant and auditor as a business expense but you sometimes hear of these agencies getting busted, you know, that's my really only concern, that's why I don't call more often." LEWIS responded: "I would say no . . . the tax ID for the business is QAT Consulting." Client-4 asked if that was a real company, and LEWIS replied: "It is . . . it exists . . . there are real offices in New York City." Client-4 stated: "That's how they usually come after you . . . fake company." LEWIS replied: "Exactly, just as long as you pay your taxes, you're fine." (Call 3969R).

c. Miami, Florida

57. On February 2, 2008, at approximately 11:45 a.m., TANYA HOLLANDER, a/k/a "Tania Hollander", the defendant, using the 1627 Number, called TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, at the 6587 Number. During the call, LEWIS asked HOLLANDER if she had problems booking in New York and Miami because there were no people to send out. HOLLANDER said that in Miami, yes, they do not have enough variety down there. LEWIS complained about the fact that there were not enough people available in Miami, and commented that it did not make sense to advertise in Miami if there were not enough people to come out. HOLLANDER said that she totally agreed with LEWIS. (Call 6125R).

58. A few minutes later, at approximately 11:48 a.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called MARK BRENER, a/k/a "Michael," the defendant, at the 0937 Number. During the call, LEWIS told BRENER that she had a client who used the service in New York who wanted to see multiple girls for multiple hours in Miami. LEWIS suggested tonight, and that the client wanted three girls, possibly four, for four hours each. LEWIS indicated that she only had two girls, and might lose the entire appointment. BRENER agreed that it was frustrating, and suggested sending someone from New York.

LEWIS said that it was too late - she had checked the flights and they were either sold out or the one way fare was too expensive. (Call 6127R).

59. At approximately 1:48 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, sent a text message to a prostitute who the Emperors Club marketed using the name "Dorine." In the text message, LEWIS told "Dorine": "Waiting 4 client 2 confirm. Client has used service in NY before & booked 4 multiple hrs. Appt may start after 6pm. Will let u know when I speak 2 client. R." (Call 6157R). One minute later, at approximately 1:49 p.m., "Dorine" sent LEWIS a text message at the 6587 Number, stating "Thx." (Call 6161R).

60. At approximately 4:37 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called an Emperors Club client ("Client-5") in Miami, Florida. During the call, Client-5 said that he wanted "both of them" (believed to be a reference to two Emperors Club prostitutes) for 6:00 p.m. Client-5 said that one would pay cash, and the other would use a credit card. Client-5 confirmed with LEWIS that the cost would be "1000" per hour and four hours for "36" (believed to be a reference to \$3,600). Client-5 confirmed with LEWIS that the girls "like to have fun," and then provided the address for the appointment to LEWIS. (Call 6197R).

61. At approximately 4:58 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called "Dorine." LEWIS told "Dorine" that she would be meeting with two clients, and that another model would be joining her. LEWIS said that the "client" (believed to be a reference to Client-5) had used the service in New York, and that the last time he saw someone for many, many hours. LEWIS and "Dorine" then discussed the amount of money and credit card charges "Dorine" should receive from Client-5. (Call 6212R). At approximately 5:12 p.m., LEWIS, using the 6587 Number, sent a text message to "Dorine," stating: "The other model's name is Michelle. Pls go inside house together. If client pays cash its 1000/hr OR 3600/4 hrs. If client pays credit its 1150/hr OR 4140/4hrs." (Call 6218R). Approximately one minute later, at approximately 5:13 p.m., LEWIS, using the 6587 Number, sent a text message to "Michelle," stating: "The other model's name is Dorine. Pls go inside house together. If client pays cash its 1000/hr OR 3600/4 hrs. If client pays credit its 1150/hr OR 4140/4 hrs." (Call 6221).

62. At approximately 6:16 p.m., TEMEKA RACHELLE LEWIS,

a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from "Dorine." During the call, "Dorine" stated that "they" (believed to be a reference to "Dorine" and "Michelle") were there, and were going in. LEWIS told "Dorine" to call back after they collected. (Call 6250R). At approximately 6:38 p.m., LEWIS, using the 6587 Number, called Client-5. During the call, Client-5 complimented the girls, and confirmed the cost for four hours would be \$3,600. LEWIS confirmed that the cost would be \$3,600 if paying in cash and \$4,140 if paying by credit card. Client-5 passed the telephone to "Dorine." LEWIS told "Dorine" that they had to collect \$3,600 in cash and \$4,140 on credit. (Call 6258R). At approximately 7:05 p.m., LEWIS, using the 6587 Number, received a call from "Dorine," who told LEWIS that "they're very nice... just... sitting by the pool... not doing anything, just talking so far." (Call 6279R). Approximately two hours later, at approximately 9:13 p.m., LEWIS, using the 6587 Number, called "Michelle," who told LEWIS that the clients were asleep, and discussed the amount of money that "Michelle" and "Dorine" had been paid. (Call 6325R).

3. The Emperors Club's International Prostitution Operations

63. During a number of intercepted telephone calls and text messages, and recovered e-mails, the defendants made arrangements for acts of prostitution in various locations in Europe. Several of these intercepted telephone calls and text messages and recovered e-mails are summarized below.

a. London, England

i. January 12, 2008

64. On January 12, 2008, at approximately 9:00 a.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called a prostitute based in London, England, who the Emperors Club marketed under the name "Astrid." During the call, "Astrid" told LEWIS that she was there with the client ("Client-6"). LEWIS asked to speak with Client-6. LEWIS told Client-6 that they had not yet received his deposit. Client-6 said that he would give everything to "Astrid." LEWIS told Client-6 that when the deposit arrived, he could use it for his next appointment. "Astrid" got back on the telephone, and LEWIS told her that Client-6 was going to give her 500 pounds, and that LEWIS would call her in an hour. (Call 1301R).

65. At approximately 10:04 a.m., TEMEKA RACHELLE



LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, retrieved a message from [Astrid], who stated that she was leaving Client-6 and everything was fine. LEWIS then received an incoming call from Client-6. LEWIS asked Client-6 how it went, and he said that she was very nice. Client-6 stated, however, that next time he wanted to see someone else. Client-6 told LEWIS that he would give her a call next week. (Call 1342R).

ii. January 24, 2008

66. On or about January 24, 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, sent an e-mail to an Emperors Club prostitute. In the e-mail, SUWAL asked the prostitute if she would be available on February 11, 2008, for a prostitution appointment in Europe with a client to cost \$25,000 or more.

b. Vienna, Austria

67. On February 11, 2008, at approximately 12:22 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, received an incoming call from an Emperors Club client ("Client-7") based in Europe. Client-7 told LEWIS that he just landed in Vienna, and was on his way to the hotel. Client-7 indicated that he would call back with his room number. (Call 3578C). At approximately 12:53 p.m., Client-7 called LEWIS and told her that he was in room 511. (Call 3580C).

68. At approximately 1:02 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, sent a text message to CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, at the 3390 Number. In the text message, LEWIS stated: "How long is 'Aveline's' appt?" (Call 3602C). In response, SUWAL sent a text message to LEWIS, stating: "[Client-7] has enough credit that they can take their time this evening and tomorrow morning. She . . . doesn't necessarily have to race out @ 9am." (Call 3605C).

4. The Emperors Club's Interstate Transportation Of Prostitutes

69. During a number of intercepted telephone calls and text messages, MARK BRENER, a/k/a "Michael," CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," and TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendants, made arrangements with clients to transport Emperors Club prostitutes interstate for purposes of prostitution. A number of the intercepted telephone calls and

text messages relating to the interstate transportation are summarized below.

a. February 15, 2008, Interstate Transportation  
From California To Las Vegas, Nevada

70. On February 7, 2008, at approximately 12:13 a.m., TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, using the 1627 Number, sent a text message to CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, from the 3390 Number. In the text message, HOLLANDER wrote: "[An Emperors Club client ('Client-8')] would like to fly falana out to las vegas on fri. do you thnk that is an ok first appt for her?" (Call 2081C).

71. On February 11, 2008, at approximately 9:28 p.m., CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, using the 3390 Number, received a call from a representative of Client-8. During the call, the representative, who said he was calling on behalf of Client-8, asked if "Felana" would be available for Friday night. SUWAL informed the representative that Client-8 would have to pay a deposit to the Emperors Club to secure "Falana's" transportation to Las Vegas. SUWAL and the representative discussed Client-8 sending a wire transfer to pay for the deposit. (Call 3692C).

72. Notwithstanding the foregoing calls, on February 12, 2008, at 9:58 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, spoke with Client-8's representative. LEWIS told the representative that "Falana" would not be available for the appointment with Client-8. (Call 9550R).

b. February 13, 2008, Interstate Transportation  
From New York To Washington, D.C.

73. On February 11, 2008, at approximately 10:53 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, sent a text message to CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, at the 3390 Number. In the text message, LEWIS wrote: "Pls let me know if [Client-9's] 'package' (believed to be a reference to a deposit of money sent by mail) arrives 2mrw. Appt wd b on Wed." (Call 3728C). SUWAL sent a text message back to LEWIS, stating: "K." (Call 3731C).

74. On February 12, 2008, at approximately 2:37 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called a prostitute who the Emperors Club marketed

using the name "Kristen." During the call, LEWIS left a message for "Kristen" that the "deposit" had not arrived today, but that they should be able to do the trip if the deposit arrived tomorrow. (Call 9324R). At approximately 4:03 p.m., LEWIS received a call from "Kristen." During the call, "Kristen" said that she had heard the message, and that was fine. LEWIS and "Kristen" then discussed the time that "Kristen" would take the train from New York to Washington, D.C. LEWIS told "Kristen" that there was a 5:39 p.m. train that arrived at 9:00 p.m., and that "Kristen" would be taking the train out of Penn Station. LEWIS confirmed that Client-9 would be paying for everything - train tickets, cab fare from the hotel and back, mini bar or room service, travel time, and hotel. LEWIS said that they would probably not know until 3 p.m. if the deposit arrived because Client-9 would not do traditional wire transferring. (Call 9362).

75. At approximately 8:12 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from Client-9. During the call, LEWIS told Client-9 that the "package" did not arrive today. LEWIS asked Client-9 if there was a return address on the envelope, and Client-9 said no. LEWIS asked: "You had QAT . . .," and Client-9 said: "Yup, same as in the past, no question about it." LEWIS asked Client-9 what time he was interested in having the appointment tomorrow. Client-9 told her 9:00 p.m. or 10:00 p.m. LEWIS told Client-9 to call her back in five minutes. (Call 9460R).

76. At approximately 8:14 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called MARK BRENER, a/k/a "Michael," the defendant, at the 0937 Number. During the call, LEWIS told BRENER that Client-9 had just called about an appointment for tomorrow, and that he had around \$400 or \$500 credit. SUWAL said that she did not feel comfortable saying that Client-9 had a \$400 credit when she did not know that for a fact. SUWAL and BRENER talked in the background about whether Client-9 could proceed with the appointment without his deposit having arrived. (Call 9462R). At approximately 8:23 p.m., LEWIS called Client-9, and told him that the "office" said he could not proceed with the appointment with his available credit. After discussing ways to resolve the situation, LEWIS and Client-9 agreed to speak the following day. (Call 9467R).

77. On February 12, 2008, at approximately 9:22 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, sent a text message to "Kristen." In the text message, LEWIS wrote: "If D.C. appt. happens u will need 2 leave

NYC @ 4:45pm. Is that possible?" (Call 9515R). "Kristen" wrote back: "Yes." (Call 9516R).

78. At approximately 3:20 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from Client-9. During the call, LEWIS told Client-9 that they were still trying to determine if his deposit had arrived. Client-9 told LEWIS that he had made a reservation at the hotel, and had paid for it in his name. Client-9 said that there would be a key waiting for her, and told LEWIS that what he had on account with her covered the "transportation" (believed to be a reference to the cost of the trainfare for "Kristen" from New York to Washington, D.C.). LEWIS said that she would try to make it work. (Call 9636R). At approximately 3:24 p.m., LEWIS, using the 6587 Number, called CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, at the 3390 Number. LEWIS explained to SUWAL what Client-9 had proposed. SUWAL told LEWIS she would call her back. (Call 9642R). At approximately 3:53 p.m., MARK BRENER, a/k/a "Michael," the defendant, using the 0937 Number, called LEWIS at the 6587 Number. BRENER and LEWIS discussed the problem about Client-9's deposit. (Call 9654R). At approximately 4:18 p.m., SUWAL, using the 3390 Number, sent a text message to LEWIS at the 6587 Number, stating: "[P]ackage arrived. Pls be sure he rsvp hotel." (Call 9659R).

79. At approximately 4:21 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called "Kristen." During the call, LEWIS told "Kristen" that the package had arrived, and that "they" (believed to be a reference to MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants) just got the mail. LEWIS told "Kristen" to get to Penn Station and call her when she picked up her tickets. (Call 9661R). At approximately 4:48 p.m., LEWIS sent a text message to "Kristen," stating: "TRAIN INFO Departing from Penn St. Arriving @ Union St. Washington, DC NYC to DC Train # 129 Dep. 5:39pm Arr. 9pm." (Call 9679R). At approximately 4:54 p.m., LEWIS sent another text message to "Kristen," stating: "TRAIN INFO Return trip DC to NYC Train #84 Dep. 2/14 8:35pm Arr. 11:57am." (Call 9683R).

80. At approximately 4:58 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received an incoming call from Client-9. During the call, LEWIS told Client-9 that his package arrived today, and Client-9 said good. LEWIS asked Client-9 what time he was expecting to have the appointment. Client-9 told LEWIS maybe 10:00 p.m. or so, and asked who it was. LEWIS said it was "Kristen," and Client-9 said

"great, okay, wonderful." LEWIS told Client-9 that she would give him a final price later, and asked Client-9 whether he could give "Kristen" "extra funds" at this appointment in order to avoid payment issues in the future. Client-9 said maybe, and that he would see if he could do that. LEWIS explained that the agency did not want a model accepting funds for a future appointment, but that she was going to make an exception that way a deposit could be made so that he would have a credit, and they would not have to "go through this" next time. Client-9 said perfect, and that he would call her regarding the room number. (Call 9686R).

81. At approximately 7:51 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from Client-9. During the call, LEWIS told Client-9 that the balance was around "26" (believed to be a reference to \$2,600), but she would give him an exact number later. LEWIS asked if when "Kristen" went to pick up the key she would have to give a name or would she be able to say that she was one of Client-9's guests for whom he left an envelope. LEWIS and Client-9 discussed how to arrange for "Kristen" to get the key to her hotel room. LEWIS said that she would prefer if "Kristen" did not have to give a name. Client-9 said that he was trying to "think this through." Client-9 repeated that his balance was "2600," and stated that maybe he would give "her," a reference to "Kristen," "3600" and have a thousand on balance. LEWIS suggested making it "1500" more. Client-9 said that would make it "4100," and said that he would look for a bank and see about it. Client-9 told LEWIS to let him go down and take care of this, and suggested that maybe he could put it [the hotel key] in an envelope with the concierge. (Call 9725R).

82. At approximately 8:47 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from Client-9. During the call, Client-9 told LEWIS to tell "Kristen" to go to the hotel and go to room 871. Client-9 told LEWIS that the door would be open. Client-9 told LEWIS that there would be a key in the room, but the door would be ajar. LEWIS asked if the hotel staff might pass by the door and close it, and Client-9 said no it was okay. Client-9 explained that the door would not be visibly open, but if someone pushed it, the door would open. LEWIS told Client-9 that his balance was \$2,721.41, and that if he wanted to do an additional "1500" or even "2000" it would be better. Client-9 said that he did not know if he could get to a machine to do that, but he would see. LEWIS said that "Kristen" would go directly to room 871. Client-9 asked LEWIS to remind him what "Kristen" looked like, and LEWIS

said that she was an American, petite, very pretty brunette, 5 feet 5 inches, and 105 pounds. Client-9 said that she should go straight to 871, and if for any reason it did not work out, she should call LEWIS. (Call 9731).

83. At approximately 9:32 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from "Kristen." During the call, "Kristen" said that she was in the room. LEWIS told "Kristen" that she would call her back when she knew when Client-9 would be there. (Call 9734R).

84. At approximately 9:36 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from "Kristen." During the call, LEWIS told "Kristen" that "he," a reference to Client-9, was at the hotel. "Kristen" told LEWIS that she just talked to him. "Kristen" said that Client-9 was coming to her. LEWIS told "Kristen" that Client-9 should be giving her "extra," and that the extra should be deposited into [REDACTED]. LEWIS told "Kristen" to text her when he arrived and LEWIS would start the four hours then, and also to let her know if he left early. (Call 9741R).

85. On February 14, 2008, at approximately 12:02 a.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, received a call from "Kristen." During the call, "Kristen" told LEWIS that "he," a reference to Client-9, had left. LEWIS asked "Kristen" what time he got there, and "Kristen" said "15 after . . . maybe 10." LEWIS asked "Kristen" how she thought the appointment went, and "Kristen" said that she thought it went very well. LEWIS asked "Kristen" how much she collected, and "Kristen" said \$4,300. "Kristen" said that she liked him, and that she did not think he was difficult. "Kristen" stated: "I don't think he's difficult. I mean it's just kind of like . . . whatever. . . I'm here for a purpose. I know what my purpose is. I am not a . . . moron, you know what I mean. So maybe that's why girls maybe think they're difficult . . . ." "Kristen" continued: "That's what it is, because you're here for a [purpose]. Let's not get it twisted - I know what I do, you know." LEWIS responded: "You look at it very uniquely, because . . . no one ever says it that way." LEWIS continued that from what she had been told "he" (believed to be a reference to Client-9) "would ask you to do things that, like, you might not think were safe - you know - I mean that . . . very basic things. . . ." "Kristen" responded: "I have a way of dealing with that . . . I'd be like listen dude, you really want the sex? . . . You know what I mean." Near the end of the call, LEWIS and "Kristen" discussed "Kristen's" departure via Amtrak, the room that Client-

9 had provided for "Kristen," and "Kristen's" share of the cash that Client-9 had provided to her. (Call 9750R).

c. March 4, 2008, Interstate Transportation From California to Chicago, Illinois

86. During February 2008, the FBI intercepted a series of telephone calls and text messages over the 6587 Number regarding an Emperors Club client ("Client-10") who requested a date in Chicago, Illinois, on March 4, 2008. As discussed below, in order to accommodate Client-10's request, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, informed Client-10 that he would have to pay the costs of transportation for the prostitute from California to Chicago.

87. On February 22, 2008, at approximately 7:48 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, spoke with Client-10. During the call, LEWIS and Client-10 discussed the possibility of a prostitute the Emperors Club marketed under the name "Chrissy" traveling to Chicago for a date with Client-10 on March 4, 2008. LEWIS informed Client-10 that he would be responsible for the airfare for "Chrissy" to Chicago, and discussed additional expenses he would owe related to the travel. (Call 11503R).

88. On February 29, 2009, at approximately 1:41 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, sent a text message to CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, at the 3390 Number. In the text message, LEWIS stated: "CHRISSY'S FLIGHT INFO orbitz.com LAX to O'Hare United 110 Dep. 3/4 10:05 a.m. Arr. 4:05pm O'Hare to LaGuardia. United 692 Dep. 3/5 8:45pm Arr. 11:45pm \$482.98." (Call 13817R).

III. THE EMPERORS CLUB'S MONEY LAUNDERING CRIMES

89. As discussed above, MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, have laundered the proceeds of the Emperors Club prostitution business primarily through two bank accounts in the names of "QAT Consulting Group, Inc." (the "First QAT Account") and "QAT International, Inc." (the "Second QAT Account") (collectively, the "QAT Accounts"). As discussed below, from in or about December 2004 through at least in or about January 2008, I believe that BRENER and SUWAL have used the QAT Accounts to launder more than \$1 million in proceeds from the Emperors Club prostitution business.

90. Based on my review of bank records and my review of documents prepared by the IRS-CID agents involved in this investigation, I have determined that CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, opened the First QAT Account on or about December 10, 2004. In the account opening documents, SUWAL claimed that QAT Consulting Group, Inc., was an active company with an address of [REDACTED] and a mailing address of [REDACTED]

[REDACTED] According to the New York Department of State website, however, QAT was an inactive corporation, and its current entity name was "Protech Consultants, Inc." Protech Consultants, however, was also listed as an inactive company by the New York Department of State. Moreover, other agents involved in this investigation have determined that the [REDACTED] [REDACTED] address was merely the address for a mail receiving and forwarding service.

91. Based on my review of bank records and my review of documents prepared by IRS-CID agents, I have also determined that CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, opened the Second QAT Account on or about November 30, 2006. In the account opening documents, SUWAL claimed that she was the President of "QAT International, Inc.," and provided 1040 Avenue of the Americas as the address for the business.

92. I have reviewed account activity for the QAT Accounts. Based on my review, I have determined that from in or about December 2004 to at least in or about January 2008 Emperors Club clients have sent more than \$1 million in payments for prostitution services to the QAT Accounts. Emperors Club clients have sent these payments primarily in the form of American Express credits and wire transfers from both inside and outside the United States.

93. From my review of bank records and my review of documents prepared by IRS-CID agents, I have also determined that from in or about December 2004 to in or about January 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, wrote more than \$100,000 in checks to cash from the QAT Accounts. During the same time period, SUWAL wrote more than \$39,000 in checks from the QAT Accounts to Protech Consultants. I have spoken with an IRS-CID agent who determined from his review of bank records that from in or about September 2003 through in or about October 2006, MARK BRENER, a/k/a "Michael," the defendant, controlled an account in the name of Protech Consultants at [REDACTED]



94. I have also determined from my discussions with IRS-CID agents who have analyzed the bank records in this case that from in or about November 2005 to in or about January 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, wrote approximately \$53,473.00 in checks from the QAT Accounts to TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant. From in or about July 2007 to in or about January 2008, SUWAL wrote approximately \$4,870 in checks from the QAT Accounts to TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant. SUWAL also wrote approximately \$22,616.00 in checks from the QAT Accounts to herself. In addition, from in or about December 2004 to in or about January 2008, SUWAL sent more than \$400,000 in checks and wire transfers from the QAT Accounts to more than 50 Emperors Club prostitutes in the United States and Europe.

95. Based on the foregoing, I believe that MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, have used and are using the QAT Accounts to commit money-laundering crimes. Specifically, I believe that BRENER and SUWAL have used and are using the QAT Accounts to promote the Emperors Club's prostitution business and to conceal the illicit nature of the proceeds of its illegal activities.

#### IV. THE APPLICATION FOR ARREST WARRANTS

96. Based on the foregoing, the Government requests that arrest warrants be issued for MARK BRENER, a/k/a "Michael," CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," and TANYA HOLLANDER, a/k/a "Tania Hollander," the defendants, so that they may be arrested and detained or bailed, as the case may be.

#### V. THE APPLICATION FOR SEARCH WARRANTS

##### A. The [REDACTED] Premises

97. For the reasons discussed below, I submit there is probable cause to believe that there is presently located at [REDACTED] a one-bedroom apartment with [REDACTED] affixed to the door and located on the [REDACTED] at [REDACTED] apartment building at [REDACTED] (the [REDACTED], evidence, fruits, and instrumentalities of violations of the federal prostitution and money-laundering offenses alleged herein. More specifically, as set forth below, based on (1) records for the First QAT Account, (2) surveillance at [REDACTED], (3) e-mail records and Internet service provider records, and (4) intercepted wire

communications, I submit that there is probable cause to believe that CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," and MARK BRENER, a/k/a "Michael," the defendants, live at the [REDACTED] that SUWAL and BRENER operate the Emperors Club's prostitution business out of [REDACTED] and that records (electronic and otherwise) and other evidence pertaining to that prostitution business are at [REDACTED]

1. Payments From The First QAT Account For The [REDACTED]

98. As set forth above, I have reviewed bank records for the First QAT Account, for which CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, is a signatory. For the years 2005, 2006, 2007, and 2008, there were numerous checks written from that account to [REDACTED] totaling more than \$30,000. The checks were written on almost a monthly basis to [REDACTED]. Notations on these checks include [REDACTED] "Brener" and, account number [REDACTED]. The most recent check I have reviewed from the QAT [REDACTED] Account to [REDACTED] was dated January 1, 2008, and it also contains the notation [REDACTED]. I have not seen any apartment number other than [REDACTED] referenced on the checks from the First QAT Account to [REDACTED]

99. On February 26, 2008, an FBI agent called telephone number [REDACTED], which is a number listed for [REDACTED]. The agent spoke to an individual, who confirmed that [REDACTED] is a property management company, and that the [REDACTED] is a property managed by [REDACTED]. On March 4, 2008, a law enforcement officer went to [REDACTED] apartment building at [REDACTED] and confirmed that [REDACTED] - is on the [REDACTED] floor of that building, with [REDACTED] affixed to the door.

100. Within the past three weeks, another law enforcement officer has reviewed the Internet website for [REDACTED] at internet address [REDACTED]. The website contains sample floor plans for apartments on the [REDACTED] line in that building. The floor plans show that [REDACTED] apartments are one-bedroom apartments that consist of a kitchen, living room and dining area, a bedroom, a bathroom, and a terrace.

2. January 17, 2008, Surveillance Of BRENER And SUWAL

101. On January 17, 2008, based on intercepted communications over the 6587 Number, law enforcement agents learned that MARK BRENER, a/k/a "Michael," and TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendants, planned to meet that day. Specifically, on January 16, 2008, at approximately 8:31 p.m., BRENER called LEWIS at the 6587 Number. During the call, BRENER and LEWIS discussed meeting the next day, January 17, 2008. BRENER suggested meeting LEWIS in Fort Lee, New Jersey, after BRENER finished a morning meeting in Manhattan. (Call 1956R). On January 17, 2008, at approximately 11:12 a.m., BRENER called LEWIS at the 6587 Number and left a voice mail message asking LEWIS when they should meet, and BRENER told LEWIS to call him or send a message to "Katie," a reference to CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, because BRENER's telephone was having difficulty taking messages. (Call 1976R).

102. That same day, at approximately 11:34 a.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, sent a text message to the CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, stating that the "cash" was "\$2320." (Call 1978R). Based on my participation in this investigation, I believe that these text messages referred to payments for illegal prostitution activities, and that MARK BRENER, a/k/a "Michael," the defendant, SUWAL and LEWIS were planning to meet that day to discuss the financial activities of the Emperors Club and payments related to work for that illegal business.

103. Based on these intercepted communications on January 16 and 17, 2008, I and other agents conducted surveillance in the vicinity of [REDACTED]. At approximately 12:45 p.m. on January 17, 2008, another FBI agent observed individuals who I believe to be MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, enter a [REDACTED] with [REDACTED] (the [REDACTED], which was parked in the parking lot at the [REDACTED] Premises. BRENER got into the driver's seat and SUWAL got into the front passenger seat, and they drove away. I have reviewed New York State Department of Motor Vehicle records for the [REDACTED]. These records reflect that the [REDACTED] bears [REDACTED] and is registered to QAT Consulting Group, Inc. [REDACTED]

104. Other FBI agents and I followed the [REDACTED] into the parking lot of a strip mall located in Fort Lee,

New Jersey. At approximately 12:57 p.m., CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, using the 3390 Number, sent a text message to TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, stating: "We are here." Approximately one minute later, LEWIS sent a text message to SUWAL, stating: "B there 2 min."

105. At approximately 1:00 p.m., another FBI agent observed a woman, whom I believe to be TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant,<sup>13</sup> approach and then enter the [REDACTED] and the [REDACTED] the left the mall parking lot and parked on a street corner near a [REDACTED] branch location. At approximately 1:23 p.m., after parking the [REDACTED] in front of a [REDACTED] branch, an FBI agent observed SUWAL get out of the Honda Odyssey and enter the [REDACTED] branch location. At approximately 1:35 p.m., an FBI agent observed SUWAL speak with a bank teller inside the branch and conduct a transaction. At approximately 1:55 p.m., the [REDACTED] left the area. At approximately 2:15 p.m., FBI agents observed the [REDACTED] parked back in the parking lot for the [REDACTED]

106. I have reviewed bank records for the First QAT Account, which reflect that on January 17, 2008, at approximately 1:33 p.m., CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, cashed a \$1,400 check drawn on the First QAT Account at a [REDACTED] branch. The time of this banking transaction coincides with the timing of when an FBI agent observed SUWAL inside of the [REDACTED] branch in Fort Lee on January 17, 2008. Moreover, SUWAL wrote a \$790 check on the First QAT Account to TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, that same day - January 17, 2008 - and LEWIS negotiated that check on January 17, 2008, at an [REDACTED] location in Brooklyn, New York. Based on the foregoing, I believe that the meeting between SUWAL, BRENER, and LEWIS in the [REDACTED] in Fort Lee on January 17, 2008, was to discuss activities related to their illegal prostitution businesses, and to engage in financial transactions with proceeds from that prostitution business.

### 3. The Computer At [REDACTED]

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<sup>13</sup> I believe the woman I saw was LEWIS based on, among other things, her similarity to a driver's license photograph for LEWIS issued out of the State of Virginia.

107. As set forth above and below, the Emperors Club utilizes the e-mail address "emperorsclubvipny@yahoo.com." (previously defined as the "Emperors Club E-Mail Account"). For example, on January 24, 2008, at approximately 1:46 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, left a voice mail message for a woman using the name "Sophia," whom I believe to have been a London-based prostitute working with the Emperors Club. In the message, LEWIS asked "Sophia" to "send an e-mail as soon as possible to emperorsclubvipny@yahoo.com," and, after repeating this e-mail address, LEWIS explained that "it may just be easier if we speak over the phone. But if you can't call . . . please try to send an e-mail, to let me know your availability for tonight."

108. On or about January 25, 2008, I obtained login records for the Emperors Club E-Mail Account. These records reflect that, between December 10, 2007, and January 24, 2008, the Emperors Club E-Mail Account was accessed more than 100 times from a computer with the Internet protocol ("IP") Address<sup>14</sup>

██████████ According to records obtained from Time Warner Cable, this IP address ██████████ was used more than a dozen times - including numerous of the dates and times when this IP address accessed the Emperors Club E-Mail - during January of 2008 by an account subscribed to by ██████████ at ██████████ (the address for the ██████████).

109. Moreover, pursuant to a court-authorized search warrant for the Emperors Club E-Mail Account, I have reviewed numerous e-mails for that account which were sent from a computer with IP address ██████████ and which relate to the illegal prostitution business run by CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," and MARK BRENER, a/k/a "Michael," the defendants. Accordingly, I believe that SUWAL and BRENER have used and are

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<sup>14</sup> An internet protocol, or IP, address is a unique numerical address assigned to a particular computer that is connected to the Internet during a given session. An IP Address is a series of four numbers, each in the range 0-255, separated by periods (e.g., ██████████). Every computer attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. An IP address acts much like a home or business street address: it enables computers connected to the Internet to properly route traffic to each other.

using a computer located inside the [REDACTED] to conduct the criminal activities of the Emperors Club.

4. Intercepted Communications And [REDACTED]

110. Interceptions of wire and electronic communications over the 3390 Number used by CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, provide further evidence that SUWAL conducts her illegal activities out of [REDACTED] and maintains records related to those illegal activities at [REDACTED]. For example:

a. On February 11, 2008, at approximately 1:57 p.m., CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, called a prostitute known as "Chrissy" and told her that her appointment with a customer in San Francisco had been confirmed. During this call, "Chrissy" told SUWAL that she had emailed SUWAL some pictures last night, and SUWAL confirmed that she had received those pictures but that SUWAL preferred the current pictures of "Chrissy" on the Website. SUWAL also noted that they had changed her rate to \$2100 per hour. (Call 3620C). Given that law enforcement agents began conducting surveillance at [REDACTED] that day, and that these agents saw SUWAL and MARK BRENER, a/k/a "Michael," the defendant, leave the parking garage at that location at 3:40 p.m., I believe that during this telephone call SUWAL was at [REDACTED]. I further believe that SUWAL received the e-mail referenced during this call at a computer located at [REDACTED].

b. On February 13, 2008, at approximately 10:54 a.m., CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, sent a text message to a prostitute, possibly known as "Alyssa," and asked her to "Pls fax cc slip from last night." (3936C). At approximately 11:59 a.m., SUWAL sent another text message to the same prostitute stating: "[J]ust received fax. Perfect thanks." (3945C). Based on my knowledge of this investigation, I believe that during this text message exchange, SUWAL wanted "Alyssa" to fax her a client's credit card slip from a recent appointment. Moreover, given that FBI agents began conducting surveillance at [REDACTED] on that day at approximately 1:55 p.m., and saw SUWAL leave the [REDACTED] with BRENER at approximately 2:00 p.m., I believe that SUWAL received that fax at [REDACTED] prior to surveillance that day.

B. The [REDACTED] Premises

111. I submit there is probable cause to believe that there is presently located at [REDACTED] at [REDACTED], which is located in a brownstone apartment building, on the [REDACTED], and is the only apartment that occupies that floor (the [REDACTED]), evidence, fruits, and instrumentalities of violations of the federal prostitution and money-laundering offenses alleged herein. More specifically, as set forth below, based on (1) bank account records, (2) surveillance of the [REDACTED] and (3) intercepted wire communications, I submit that there is probable cause to believe that TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, lives at the [REDACTED] that LEWIS conducts illegal activities relating to the Emperors Club out of the [REDACTED], and that records (electronic and otherwise) and other evidence pertaining to those illegal activities are at the [REDACTED]

1. Banking Records And The Clinton Avenue Premises

112. Another law enforcement official has reviewed records from [REDACTED] which reflect that TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, maintains an account with [REDACTED], and that, as of February 2008, LEWIS's bank mailing address was changed to the [REDACTED]. As a result, LEWIS currently receives her [REDACTED] statements at the [REDACTED]. Moreover, records from the First QAT Account show that, since January 1, 2008, LEWIS has received at least three checks drawn on that account, and that those checks were negotiated at an [REDACTED] location in [REDACTED].

2. Surveillance Of LEWIS At [REDACTED] Premises

113. On January 31, 2008, at approximately 8:30 a.m., another law enforcement officer observed TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, exit the building at [REDACTED]. The officer identified LEWIS based on her driver's license photograph issued out of the [REDACTED]. This was the same photograph used to identify LEWIS when she met with CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," and MARK BRENER, a/k/a "Michael," the defendants, on January 17, 2008, in Fort Lee, New Jersey.

114. On February 28, 2008, at approximately 2:50 p.m., another law enforcement officer went to conduct surveillance at

[REDACTED] At approximately 2:55 p.m., the officer spoke with TAMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant. She confirmed that she lived in the building, pointed at the window of the [REDACTED] and indicated that she lived there. At approximately 3:00 p.m., the officer saw LEWIS enter the [REDACTED], and noticed that this was the only apartment on that floor. There was no marking on the door to the [REDACTED], other than an ADT security sticker.

115. On February 28, 2008, at approximately 3:12 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, used the 6587 Number to call CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant. During the call, SUWAL told LEWIS that the "phones are transferred to you." SUWAL also provided LEWIS with prostitution booking updates, including the date and time of at least two prostitution appointments with different customers. (Call 13581R). Based on the timing of this call, and the timing of the officer's observation of LEWIS entering the [REDACTED] [REDACTED] I believe that LEWIS was at the [REDACTED] when she took this call to receive specific information about prostitution booking appointments.

### 3. Intercepted Wire Communications And The [REDACTED] Premises

116. Based upon intercepted wire communications over the 6587 Number, I believe TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, worked from her home when she handled prostitution bookings for the Emperors Club. I therefore believe that records and evidence concerning these illegal activities are at the [REDACTED]. For example, on February 5, 2008, at approximately 10:21 p.m., LEWIS, using the 6587 Number, spoke with MARK BRENER, a/k/a "Michael," the defendant, about their concerns as to whether the telephone number on the Website was working. LEWIS told BRENER that she did not get any calls yesterday, and, if she had any calls early in the day, those calls related to "prebookings." LEWIS noted that one client had called and was able to "get through," but LEWIS did not know what number he called. BRENER said that the telephone company was attempting to fix the problem, and that his purpose in calling LEWIS was to say that only the "917" number was working and not to wait to call regarding prebookings. BRENER asked LEWIS during this call if she had an Internet computer at home or if she went to an Internet café. LEWIS responded that she had a computer at home, but that she sometimes had to go to a café because of difficulties in accessing attachments. (Call 6873R). Given



LEWIS's comment about having a computer at her home, I believe that LEWIS works with a computer out of [REDACTED] in conducting the illegal business of the Emperors Club.

117. Furthermore, in communications intercepted over the 6587 Number and the 3390 Number, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, has indicated that some of the records she maintains regarding the Emperors Club's activities include notes on the prostitutes' physical appearances, credit card information from prostitution clients, hourly rates for the prostitutes, booking sheets relating to prostitution appointments, and contact information for clients.

118. For example, on February 7, 2008, at approximately 6:30 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, spoke with CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, about how much money a prostitute the Emperors Club marketed using the name "Alyssa" had collected from a client. SUWAL indicated that she was unsure if LEWIS would still have the "bookers sheet" for that appointment, and LEWIS responded that she had "the piece of paper I wrote it on," and that the amount "was 1200 cash and 2070 credit card." (Call 3175C). Given SUWAL's comment about a "bookers sheet" and LEWIS's comment about still having the document on which she wrote the amount, I believe that LEWIS maintains prostitution booking records at the Clinton Road Premises.

C. The [REDACTED] Premises

119. I submit there is probable cause to believe that there is presently located at the home at [REDACTED] (the [REDACTED]), evidence, fruits, and instrumentalities of violations of the federal prostitution and money-laundering offenses alleged herein. More specifically, based on (1) bank records and (2) wire communications, I believe that TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, lives at the [REDACTED] that HOLLANDER conducts activities related to the Emperor's Club illegal prostitution business out of the [REDACTED], and that records (electronic and otherwise) and other evidence pertaining to that illegal prostitution business are at the [REDACTED].

1. Bank Records And The [REDACTED] Premises

120. Law enforcement agents have reviewed bank records for an account TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, maintains at the [REDACTED]. Those records, which cover the period from 2007 and to February 2008, reflect that HOLLANDER receives her banking mail at the [REDACTED]. Moreover, in connection with this bank account, HOLLANDER submitted a copy of her New York State Driver's License, which contained a photograph that I used to identify HOLLANDER on January 28, 2008.

121. Law enforcement agents have reviewed records showing that TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, received numerous checks drawn on the First QAT Account during 2007, and at least three of those checks were deposited into the HOLLANDER's [REDACTED] account between October and December of 2007. Furthermore, HOLLANDER received at least two checks in 2008 drawn on the First QAT Account that were negotiated at a [REDACTED] bank location in [REDACTED].

2. Wire Communications And The [REDACTED] Premises

122. Based on intercepted wire communications, as well as cell site information obtained from the 1627 Number used by TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, to conduct the illegal activities of the Emperors Club, I believe that HOLLANDER conducts those illegal activities out of the [REDACTED] and that she maintains records relating to such activities at the [REDACTED]. For example:

a. On February 7, 2008, at approximately 8:55 p.m., CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, sent a text message to TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, at the 1627 Number, stating: "Hi tania. If possible, pls do not send pamela on a travel date w/ a new client. Pls refer to the sheet in the bookers manual that addresses #1travel date models." (Call 3236C). Given this reference to a "sheet" in a "bookers manual," I believe that HOLLANDER maintains a record with procedures for booking prostitutes at the [REDACTED].

b. On February 10, 2008, at approximately 6:26 p.m., CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, called TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, at the 1627 Number. During the call, SUWAL provided HOLLANDER with numerous prostitution booking updates. SUWAL also gave

HOLLANDER specific information about at least six separate prostitution bookings in various cities - New York, Washington, D.C., Los Angeles, and Miami, - with different clients, on different dates, and with different prostitutes. (Call 3537R). Given the specificity and quantity of the information HOLLANDER received during this call - which included client names, city information, various times and dates for prostitution appointments, hotel information, telephone numbers, prostitute availability for the appointments, and prostitute rate information - I believe that HOLLANDER must have recorded this information onto paper or electronic media in order to handle calls concerning this prostitution meetings over the next several days. Furthermore, during this call, SUWAL and HOLLANDER discussed how to market a specific prostitute known as "Dorine," and HOLLANDER told SUWAL: "I have the write up on Dorine." Based on this call, I believe that HOLLANDER maintains records about "Dorine" and other Emperors Club prostitutes at the [REDACTED]

## VI. APPLICATION FOR SEIZURE WARRANTS

### A. The QAT Accounts

123. As discussed above, MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, have used the QAT Accounts to received more than \$1 million in proceeds from the Emperors Club illegal prostitution business. BRENER and SUWAL also have used the QAT Accounts to make payments of illicit proceeds to themselves, to TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," and TANYA HOLLANDER, a/k/a "Tania Hollander," the defendants, and to Emperors Club prostitutes. As a result, I submit that there is probable cause to believe that the QAT Accounts contain the proceeds of illegal activity and have been used and are being used by BRENER and SUWAL to conduct their money-laundering crimes.

### B. The LEWIS Account and The HOLLANDER Account

124. As discussed above, based on my discussions with IRS-CID agents, I have determined that between in or about November 2005 and January 2008, CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, wrote approximately \$53,473.00 worth of checks from the First QAT Account to TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, a portion of which were ultimately deposited into [REDACTED] account number [REDACTED], in the name of Temeka R. Lewis (the "LEWIS Account"). Moreover, during past twelve months most of the money deposited into the LEWIS Account,

besides cash, appears to have come from the First QAT Account. Based on my reviewed of intercepted wire communications, I have determined that individuals working with the Emperors Club often receive payments in cash. Also, during that same period there is no indication that the LEWIS Account received money from any employment activity other than LEWIS's work for Emperors Club. From in or about July 2007 through July 2008, SUWAL wrote approximately \$4,870.00 in checks from the First QAT Account to TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, \$4,700.00 of which were deposited into [REDACTED] account number [REDACTED], in the name of Tania R. Hollander (the "HOLLANDER Account").

C. The [REDACTED]

125. I submit that there is probable cause to believe that the [REDACTED] has been used by MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, to conduct their federal prostitution and money-laundering crimes. As set forth above, on January 17, 2008, law enforcement agents observed SUWAL and BRENER use the [REDACTED] to both conduct banking activity and meet with TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, in connection with the illegal prostitution business.

126. In addition to this meeting, on January 28, 2008, law enforcement agents surveilled MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, use the [REDACTED] to meet with TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, in connection with the illegal prostitution activities. Specifically, on January 28, 2008, after series of intercepted communications relating in part to the amount of money HOLLANDER was to receive from BRENER and SUWAL, the three defendants met in person in the vicinity of Grand Central Terminal in New York, New York. I personally observed individuals who matched the description of BRENER and SUWAL inside the [REDACTED] during this surveillance.

D. Statutory Authority For Seizure Warrants

127. The statutory provisions pursuant to which the QAT Bank Accounts, the LEWIS Account, the HOLLANDER Account, and the [REDACTED] are subject to seizure and forfeiture are as follows:

a. Title 18, United States Code, Section 981(a)(1)(A) subjects to forfeiture "[a]ny property, real or personal, involved in a transaction or attempted transaction in violation of . . . section 1956 . . . of this title [relating to money laundering], or any property traceable to such property."

b. Title 18, United States Code, Section 981(a)(1)(C) subjects to forfeiture: "Any property, real or personal, which constitutes or is derived from proceeds traceable to . . . any offense constituting 'specific unlawful activity' (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense."

c. Title 18, United States Code, Section 1956 provides, in pertinent part, that

(a)(1) Whoever, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves the proceeds of specified unlawful activity--

(A)(i) with the intent to promote the carrying on of specified unlawful activity; or

(B) knowing that the transaction is designed in whole or in part--

(i) to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity;

shall be guilty of a crime.

d. "Specified unlawful activity" is defined in 18 U.S.C. § 1956(c)(7), and includes any offense listed under 18 U.S.C. § 1961(1). Section 1961(1), in turn, lists as offenses 18 U.S.C. §§ 1952, 2421, and 2422.

e. Title 18 U.S.C. § 984 provides in a forfeiture action in which the property is funds deposited in an account in a financial institution, that

(A) it shall not be necessary for the Government to identify the specific property involved in the offense that is the basis for the forfeiture; and

(B) it shall not be a defense that the property involved in such an offense has been removed and replaced by identical property.

f. In addition, "any identical property found in the same place or account as the property involved in the offense that is the basis for the forfeiture shall be subject to forfeiture" except that "[n]o action . . . to forfeit property not traceable directly to the offense that is the basis for the forfeiture may be commenced more than 1 year from the date of the offense."

g. Title 18, United States Code, Section 981(b)(2) provides that the Secretary of Treasury may seize property subject to forfeiture under 18 U.S.C. § 981(a)(1) when the Secretary "has obtained a warrant for such seizure pursuant to the Federal Rules of Criminal Procedure."

128. Based on the foregoing, there is probable cause to believe that the QAT Accounts, the LEWIS Account, the HOLLANDER Account, and the [REDACTED] constitute property that was involved in transactions in violation of 18 U.S.C. § 1956, or property traceable to such property, in that the defendant funds represent the proceeds of the use of facilities in interstate commerce with the intent to promote unlawful prostitution activity, the interstate transportation of individuals for purposes of prostitution, and the persuasion of individuals to travel in interstate commerce to engage in prostitution, in violation of 18 U.S.C. §§ 1952, 2421, and 2422, which were attempted to be transferred and were transferred with the intent to promote the carrying on of the illegal prostitution business and in order to conceal the nature, location, source and ownership of the proceeds of such business. In addition, there is probable cause to believe that the QAT Accounts, the SUWAL Account, the LEWIS Account, and the HOLLANDER Account are subject to forfeiture to the United States of America pursuant to 18 U.S.C. § 981(a)(1)(C) as these accounts contain proceeds constituting and derived from violations of 18 U.S.C. §§ 1952, 2421, and 2422, and proceeds traceable to such violations.

VII. CONCLUSION

129. Based on the foregoing, I respectfully request that the arrest warrants and seizure warrants specified above be issued, and that a search warrant for the [REDACTED] be issued, and that the individuals arrested be imprisoned or bailed as the case may be.

Kent F. Hoey  
KENNETH HOSEY  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
day of March, 2008.

MAR 05 2008

Ronald L. Ellis  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK

RONALD L. ELLIS  
United States Magistrate Judge  
Southern District of New York