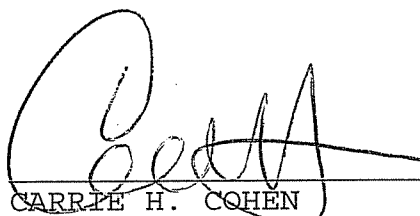


Approved:



CARRIE H. COHEN

Assistant United States Attorney

Before: HONORABLE GABRIEL W. GORENSTEIN
United States Magistrate Judge
Southern District of New York

13 MAG 1844

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

: SEALED COMPLAINT

- v. -

: Violations of 18 U.S.C. §§ 371
and 203(a)(1)(B) and (a)(2)

SAMUEL PIERRE and
KENOL JANVIER,

:
COUNTY OF OFFENSE:
NEW YORK

Defendants.

- - - - -X

SOUTHERN DISTRICT OF NEW YORK, ss.:

ERIN P. ZACHER, being duly sworn, deposes and says that she is a Special Agent of the Federal Bureau of Investigation ("FBI"), and charges as follows:

COUNT ONE

1. From in or about May 2008 up to and including in or about December 2008, SAMUEL PIERRE and KENOL JANVIER, the defendants, and other known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, bribery of an employee of a Member of Congress, in violation of Title 18, United States Code, Sections 203(a)(1)(B) and (a)(2).

2. It was a part and object of the conspiracy that SAMUEL PIERRE and KENOL JANVIER, the defendants, and others known and unknown, otherwise than as provided by law for the proper discharge of official duties and while PIERRE was an employee of the United States in the legislative branch of the Government and in an agency of the United States, willfully and knowingly did, directly and indirectly, demand, seek, receive, accept and agree to receive and accept compensation for representational services, as agent and attorney and

otherwise, rendered and to be rendered personally and by others in relation to proceedings, applications, requests for rulings and other determinations, contracts, claims, controversies, charges, accusations, arrests, and other particular matters in which the United States was a party and had a direct and substantial interest, before departments, agencies, courts, court-martials, officers, and civil, military, and naval commissions, in violation of Title 18, United States Code, Section 203(a) (1) (B).

3. It was a part and object of the conspiracy that SAMUEL PIERRE and KENOL JANVIER, the defendants, and others known and unknown, otherwise than as provided by law for the proper discharge of official duties, willfully and knowingly did, directly and indirectly, give, promise, and offer compensation for such representational services rendered and to be rendered at a time when the person to whom the compensation was given, promised, and offered, is and was an employee of the United States in the legislative branch of the Government, in violation of Title 18, United States Code, Section 203(a) (2).

Overt Acts

4. In furtherance of the conspiracy and to effect its illegal objects, SAMUEL PIERRE and KENOL JANVIER, the defendants, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about June 11, 2008, JANVIER accepted money and other things of value from certain individuals in exchange for attempting and/or promising to assist those individuals with immigration-related matters pending before the Department of Homeland Security, U.S. Citizenship and Immigration Services ("DHS").

b. On or about September 2, 2008, while PIERRE was employed by a Representative to the United States Congress ("the Congressman") in the Congressman's District Office in Brooklyn, New York (the "Congressman's Office"), PIERRE, in exchange for money and other things of value, attempted to assist JANVIER on an immigration-related matter that was pending before DHS.

c. On or about October 2, 2008, while PIERRE was employed by the Congressman, PIERRE, in exchange for money and other things of value, attempted to assist certain individuals with immigration-related matters pending before DHS.

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

COUNT TWO

5. From in or about May 2008 up to and including in or about December 2008, in the Southern District of New York and elsewhere, SAMUEL PIERRE, the defendant, otherwise than as provided by law for the proper discharge of official duties and while PIERRE was an employee of the United States in the legislative branch of the Government, willfully and knowingly did, directly and indirectly, demand, seek, receive, accept and agree to receive and accept compensation for representational services, as agent and attorney and otherwise, rendered and to be rendered personally and by others in relation to proceedings, applications, requests for rulings and other determinations, contracts, claims, controversies, charges, accusations, arrests, and other particular matters in which the United States was a party and had a direct and substantial interest, before departments, agencies, courts, court-martials, officers, and civil, military, and naval commissions, to wit, while PIERRE was employed by the Congressman, PIERRE took money and other things of value in exchange for attempting and/or promising to assist certain individuals with immigration-related matters pending before DHS.

(Title 18, United States Code, Section 203(a)(1)(B).)

COUNT THREE

6. From in or about May 2008 up to and including in or about December 2008, in the Southern District of New York and elsewhere, KENOL JANVIER, the defendant, otherwise than as provided by law for the proper discharge of official duties, willfully and knowingly did, directly and indirectly, give, promise, and offer compensation for such representational services rendered or to be rendered at a time when the person to whom the compensation was given, promised, and offered, is and was an employee of the United States in the legislative branch of Government, to wit, while SAMUEL PIERRE, the defendant, was employed by the Congressman, JANVIER paid PIERRE money and other things of value to assist JANVIER with an immigration-related matter that was pending before DHS.

(Title 18, United States Code, Section 203(a)(2).)

The bases for my knowledge and for the foregoing charges, are, in part, as follows:

7. I have been a Special Agent at the FBI for more than five years and have been involved in the investigation of this matter. This affidavit is based upon my own investigation, conversations with other law enforcement agents, investigators, and witnesses, and my

review of reports and records. 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 the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

SAMUEL PIERRE'S WORK FOR THE CONGRESSMAN

8. Based on my review of documents obtained from the United States House of Representatives, Office of the General Counsel ("U.S. House OGC"), my interviews of representatives from the Congressman's Office, my review of telephone records, and a voluntary interview of SAMUEL PIERRE, the defendant, which is more fully described below, I have learned, among other things, the following, in substance and in part:

a. From in or about 2007 up to and including in or about July 2009, PIERRE was employed by the Congressman as a Brooklyn South Liaison in the Congressman's District Office. As the Brooklyn South Liaison, PIERRE's job responsibilities included helping the Congressman's constituents with immigration-related issues, by, for example, inquiring about the status of constituents' immigration-related matters pending before DHS.

b. The Congressman's Office assigned PIERRE an e-mail address to use in connection with his work ("PIERRE's Congressional E-mail Address").

c. The Congressman's Office assigned PIERRE a cellphone to use in connection with his work ("PIERRE's Congressional Cellphone").

d. The Congressman's Office had a telephone number to which all office employees, including PIERRE had access ("PIERRE's Congressional Office Phone").

e. During some of the time relevant to this Complaint, PIERRE had a personal cellphone subscribed to in his name ("PIERRE's Personal Cellphone").

KENOL JANVIER'S RADIO SHOW

9. Based on my review of public documents and an English translation of a transcript from an audio recording of a radio program that aired on a radio station (the "Radio Station") in the late spring

or early summer of 2008, which was hosted by KENOL JANVIER, the defendant ("JANVIER's Radio Show"), I have learned, among other things, the following, in substance and in part:

a. The Radio Station's primary audience was individuals of Haitian descent and JANVIER's Radio Show was conducted largely in the Haitian-Creole language.

b. JANVIER referred to himself on JANVIER's Radio Show as "Boxer Kenol," and has used the name "Boxer Kenol" on a social networking website.

c. In or about the late spring or early summer of 2008, SAMUEL PIERRE, the defendant, was a guest on JANVIER's Radio Show and stated that he was employed by the Congressman as an immigration specialist. While PIERRE was a guest on JANVIER's Radio Show, PIERRE and JANVIER discussed, among other things, issues related to the Haitian community, including immigration, and invited listeners to call-in with questions. Those listeners who called JANVIER's Radio Show seeking immigration-related help in response to this invitation were told by JANVIER and/or PIERRE to call them for free assistance at "the office" and were given a telephone number to call (the "Office Number").

10. Based on my review of telephone records for the Office Number, I have learned that during the times relevant to this Complaint up to and including in or about December 2008, the Office Number was a cellphone subscribed to by KENOL JANVIER, the defendant ("JANVIER's Cellphone").

WITNESS INTERVIEWS

11. Based on my interview of an individual who listened to JANVIER's Radio Show ("Witness 1") and my review of telephone records for JANVIER's Cellphone, PIERRE's Congressional Cellphone, and a telephone number used by Witness 1 ("Witness 1's Phone"), I have learned, among other things, the following, in substance and in part:

a. On or about June 6, 2008, Witness 1 called JANVIER's Cellphone to seek help with Witness 1's application for lawful permanent residency, commonly referred to as a "green card." Witness 1 spoke to a male individual, whom I believe was KENOL JANVIER, the defendant, and JANVIER told Witness 1 he needed \$2,000 to help Witness 1.

b. Shortly thereafter, Witness 1 met JANVIER at an office on Bedford Avenue in Brooklyn, New York ("JANVIER's Office")

and gave him approximately \$800 cash as a down payment as well as some documents related to Witness 1's green card application. Witness 1 believed the balance of \$1,200 was due upon receipt of the green card.

c. Thereafter, on or about June 25, 2008, Witness 1 received a call from an individual who identified himself by name, which Witness 1 recalls began with a "P" and whom I believe was SAMUEL PIERRE, the defendant. PIERRE said he was calling on behalf of JANVIER and wanted to know how much Witness 1 had paid JANVIER. Witness 1 told PIERRE how much Witness 1 had paid JANVIER and PIERRE said he would call Witness 1 back.

d. Based on my review of telephone records, on or about June 25, 2008, there was a telephone call between JANVIER's Cellphone and PIERRE's Personal Cellphone followed later that same day by a telephone call from PIERRE's Congressional Cellphone to Witness 1's Phone.

e. PIERRE did not return Witness 1's telephone call but in or about July 2008, Witness 1 called JANVIER's Cellphone and spoke to JANVIER who told Witness 1 that Witness 1 needed to pay the balance due, which was \$1,250. Witness 1 did not pay any more money to JANVIER and never heard from JANVIER or PIERRE again.

f. Witness 1 never received the promised immigration-related assistance and JANVIER never returned the \$800 down payment paid to him.

g. Witness 1 did not reside in the Congressman's District during the relevant time period and thus was not the Congressman's constituent during the relevant time period.

12. Based on my interviews of an individual who listened to JANVIER's Radio Show ("Witness 2")¹ and a second individual ("Witness 3"), my review of a business card provided to me by Witness 2, and my review of telephone records for JANVIER's Cellphone and PIERRE's Congressional Cellphone, I have learned, among other things, the following, in substance and in part:

a. In or about early June 2008, Witness 2 called JANVIER's Cellphone to seek assistance with an immigration-related issue. A male who answered JANVIER's Cellphone, whom I believe to have been KENOL JANVIER, the defendant, listened to Witness 2's immigration-related issue, and told Witness 2 that he had a partner

¹ Witness 2 now is deceased.

who could help. Witness 2 then agreed to meet JANVIER to discuss the issue further.

b. Thereafter, on or about June 12, 2008, Witness 2, accompanied by, among others, Witness 3, met JANVIER at JANVIER's Office and JANVIER informed Witness 2 in Witness 3's presence that he worked with a Congressman and, for a \$5,000 fee, the Congressman would help Witness 2. At that meeting in the presence of Witness 3, Witness 2 gave JANVIER \$2,000 as a down payment and JANVIER gave Witness 2 a business card ("JANVIER Business Card 1"). I have reviewed JANVIER Business Card 1 and it contained the following information:

i. JANVIER Business Card 1 was for "Boxer Kenol" as a "Manager" at JANVIER's Office, which was a medical care office located on Bedford Avenue in Brooklyn, New York.

ii. On the back of JANVIER Business Card 1 was handwriting that stated, in sum and substance, that Witness 2 paid JANVIER \$2,000 for "immigration" work that costs \$5,000 with a \$3,000 balance owed, followed by a signature for "Kenol Janvier."

c. Witness 3 reviewed a photograph of JANVIER obtained from a social networking site and identified the individual in the photograph as the person with whom Witness 2 and Witness 3 met at JANVIER's Office as described in the preceding paragraph.

d. After Witness 2 and Witness 3 met JANVIER at JANVIER's Office, on or about June 25, 2008, a male caller who claimed to be a Congressman but whom I believe was SAMUEL PIERRE, the defendant, telephoned Witness 2 and told Witness 2, in substance and in part, that he had spoken to JANVIER regarding Witness 2's immigration issues and that PIERRE could help Witness 2. Witness 2 told PIERRE he needed to call him back and PIERRE gave Witness 2 the number for PIERRE's Congressional Office Phone. When Witness 2 called PIERRE's Congressional Office Phone later that same day, the person answering the call identified the office as the Congressman's Office.

e. Based on my review of telephone records, on or about June 25, 2008, there was a call between JANVIER's Cellphone and PIERRE's Personal Cellphone followed later that same day by a telephone call from PIERRE's Congressional Cellphone to a telephone used by Witness 2.

f. During a later call between PIERRE and Witness 2, PIERRE asked Witness 2 how much Witness 2 had paid JANVIER for PIERRE's assistance. Witness 2 told PIERRE that Witness 2 had paid JANVIER \$2,000.

g. After the telephone calls described in the preceding paragraphs, in or about July 2008, Witness 2, accompanied again by Witness 3, met again with JANVIER at JANVIER's Office and paid JANVIER the remaining balance of \$3,000.

h. In or about late July or early August 2008, when Witness 2 had not heard from JANVIER or PIERRE and believed no action had been taken with respect to Witness 2's immigration issue, Witness 2 called JANVIER's Cellphone and JANVIER claimed not to know Witness 2.

i. In or about April 2009, Witness 2 tried to locate JANVIER at both the Radio Station and JANVIER's Office. At the Radio Station, Witness 2 was told that JANVIER only purchased air time from the Radio Station and was not its employee. At JANVIER's Office, Witness 2 was told that JANVIER no longer worked there.

j. Witness 2 never received the promised immigration-related assistance and JANVIER never refunded the \$5,000 fee paid to him.

k. Witness 2 did not reside in the Congressman's District during the relevant time period and thus was not the Congressman's constituent during the relevant time period.

13. Based on my interview of an individual who listened to JANVIER's Radio Show ("Witness 4") and my review of telephone records for JANVIER's Cellphone, PIERRE's Congressional Cellphone, and a telephone used by Witness 4 ("Witness 4's Phone"), I have learned, among other things, the following, in substance and in part:

a. On or about June 9, 2008, Witness 4 called JANVIER's Cellphone to seek help with Witness 4's spouse's green card application and spoke to a male individual whom I believe was KENOL JANVIER, the defendant. Witness 4 agreed to meet JANVIER at JANVIER's Office.

b. On or about June 10, 2008, when Witness 4 met JANVIER at JANVIER's Office, JANVIER told Witness 4 that he needed a \$2,500 fee to assist Witness 4 with the spousal green card application. Witness 4 was not able to pay the full \$2,500 fee at that time so Witness 4 gave JANVIER a check for \$1,000 ("Witness 4's Check").

c. On or about June 17, 2008, Witness 4 met JANVIER at JANVIER's Office and paid him the remaining balance of \$1,500 in cash. At that time, JANVIER gave Witness 4 a business card ("JANVIER

Business Card 2"). I have reviewed JANVIER Business Card 2 and it contained the following information:

i. JANVIER Business Card 2 was for "Boxer Kenol" as a "Manager" at JANVIER's Office, which was a medical care office located on Bedford Avenue in Brooklyn, New York.

ii. On the back of JANVIER Business Card 2 was handwriting that stated, in sum and substance, that Witness 4 paid JANVIER \$2,500 for "immigration" work, followed by a signature for "Kenol Janvier."

d. JANVIER told Witness 4 he would contact the Congressman to help with Witness 4's spouse's green card application.

e. Based on my review of telephone records, on or about June 25, 2008, there was a telephone call from JANVIER's Cellphone to PIERRE's Personal Cellphone followed later that same day by a telephone call from PIERRE's Congressional Cellphone to Witness 4's spouse's cellphone followed later that same day by a call from Witness 4's Phone to PIERRE's Congressional Cellphone.

f. Thereafter, Witness 4 called JANVIER's Cellphone and PIERRE's Congressional Cellphone on several occasions, including on October 1 and 2, 2008, to inquire about the status of the spousal green card application. During one of these calls, PIERRE told Witness 4 that he was working on the application and that it would be the next application to be addressed.

g. Witness 4 never heard from JANVIER or PIERRE again and when Witness 4 called JANVIER's Cellphone, the individual who answered it told Witness 4 that the number no longer belonged to JANVIER. Witness 4 also went to JANVIER's Office and was told JANVIER no longer worked there.

h. Witness 4 never received the promised immigration-related assistance and JANVIER never refunded the \$2,500 fee paid to him.

i. Witness 4 did not reside in the Congressman's District during the relevant time period and thus was not the Congressman's constituent during the relevant time period.

14. Based on my interview of an individual who listened to JANVIER's Radio Show ("Witness 5") and my review of telephone records for JANVIER's Cellphone and a telephone number used by Witness 5 ("Witness 5's Phone"), I have learned, among other things, the

following, in substance and in part:

a. On or about August 25, 2008, Witness 5 called JANVIER's Cellphone to seek help with Witness 5's deportation order and spoke to a male individual whom I believe was KENOL JANVIER, the defendant. JANVIER told Witness 5 he needed \$5,000-6,000 to help Witness 5 and that he worked with someone in Washington D.C.

b. On or about September 2, 2008, Witness 5 met JANVIER at JANVIER's Office and gave JANVIER a check in the amount of approximately \$3,000 ("Witness 5's Check"). Witness 5 told JANVIER that Witness 5 would pay the balance upon completion of the work.

c. Based on my review of telephone records, that same day, on or about September 2, 2008, Witness 5's Phone and JANVIER's Cellphone have numerous calls between them with the last call at approximately 11:43 a.m. On or about that same day at approximately 12:45 p.m., JANVIER's Cellphone called PIERRE's Personal Cellphone.

d. When Witness 5 failed to hear from JANVIER, Witness 5 repeatedly called JANVIER's Cellphone and when JANVIER finally called back, JANVIER told Witness 5 that he needed Witness 5's alien number, which Witness 5 provided to JANVIER. Witness 5 never heard from JANVIER again and was unable to reach JANVIER on JANVIER's Cellphone. Witness 5 also went to the Radio Station and was told that JANVIER did not work there.

e. Witness 5 never received the promised immigration-related assistance and JANVIER never refunded the \$3,000 deposit paid to him.

f. Witness 5 did not reside in the Congressman's District during the relevant time period and thus was not the Congressman's constituent during the relevant time period.

15. The total amount of money Witnesses 1, 2, 4, and 5 paid to KENOL JANVIER, the defendant, for immigration-related assistance that they did not receive was approximately \$11,300.

RECORDS RELATED TO PIERRE AND JANVIER

16. I have compared the signature on a Florida driver's license for KENOL JANVIER, the defendant, ("JANVIER's Driver's License") with the signature on JANVIER Business Card 1 given to Witness 2 in Witness 3's presence and the signature on JANVIER Business Card 2 given to Witness 4, and all the signatures appear to have been written by the same person.

17. Based on my review of bank records, I have learned, among other things, the following, in substance and in part:

a. During the times relevant to this Complaint, KENOL JANVIER, the defendant, maintained a checking account ("JANVIER's Bank Account").

b. On or about June 11, 2008, Witness 4's Check for \$1,000 was deposited into JANVIER's Bank Account.

c. On or about September 3, 2008, Witness 5's Check for \$3,000 was deposited into JANVIER's Bank Account.

d. I have compared the endorsement signatures on Witness 4's Check with Witness 5's Check and the signatures on JANVIER Business Card 1, JANVIER Business Card 2, and JANVIER's Driver's License, and all appear to have been written by the same person.

18. Based on my review of certain records obtained from the U.S. House OGC and DHS, I have learned, among other things, the following:

a. On or about October 2, 2008, the DHS office in New York, New York received an e-mail from PIERRE's Congressional E-mail Address inquiring, on behalf of the Congressman's Office and for a "constituent," about the status of Witness 1's immigration application.

b. On or about October 2, 2008, the DHS office in New York, New York received an e-mail from PIERRE's Congressional E-mail Address inquiring, on behalf of the Congressman's Office and for a "constituent," about the status of Witness 2's petition.

c. On or about October 2, 2008, the DHS office in New York, New York received an e-mail from PIERRE's Congressional E-mail Address inquiring, on behalf of the Congressman's Office and for a "constituent," about the status of Witness 4's spouse's application.

19. Based on my review of records obtained from the U.S. House OGC and DHS, I have learned, among other things, the following, in substance and in part:

a. On or about September 2, 2008 and on or about January 13, 2009, the DHS office in New York, New York received e-mails from PIERRE's Congressional E-mail Address regarding an immigration application pending with DHS on behalf of KENOL JANVIER, the defendant.

b. Among other documents, SAMUEL PIERRE's work files at the Congressman's Office contained documents related to an immigration application pending with DHS for KENOL JANVIER, the defendant, including, but not limited to, a letter written on the letterhead of the Congressman's Office to a federal Government immigration office requesting that JANVIER's immigration application be expedited with PIERRE as the person to contact with respect to such request and a facsimile with PIERRE listed as the sender and sent to a fax number in New York, New York regarding JANVIER's immigration application.

STATEMENTS OF PIERRE AND JANVIER AND ANOTHER WITNESS

20. On or about July 21, 2010, KENOL JANVIER, the defendant, voluntarily agreed to speak to me and told me, among other things, the following, in substance and in part:

a. JANVIER and SAMUEL PIERRE, the defendant, have known each other for a long time.

b. JANVIER worked at a medical office on Bedford Avenue in Brooklyn, New York.

c. JANVIER had PIERRE as a guest on JANVIER's Radio Show to provide immigration advice to listeners and any such advice provided was free.

d. After JANVIER's Radio Show, JANVIER received telephone calls from listeners requesting immigration-related assistance. In response, JANVIER gave the callers PIERRE's telephone number to call for such assistance. JANVIER initially claimed that he never discussed the calls from these listeners with PIERRE and never took money from anyone seeking immigration-related assistance.

e. Later in the interview, JANVIER admitted that the statements in the preceding paragraph were not true and that he had spoken with PIERRE regarding an individual seeking immigration-related assistance ("FNU LNU") and that PIERRE told him FNU LNU would deliver important papers and money to JANVIER. JANVIER claimed that, based on instructions he received from PIERRE, he told FNU LNU how much money to deliver to JANVIER for the immigration-related assistance PIERRE had promised to provide to FNU LNU. JANVIER admitted he later met with FNU LNU, took an envelope from FNU LNU containing what JANVIER called a "down payment" for immigration-related assistance to be provided to FNU LNU by PIERRE, and gave the envelope to PIERRE.

21. On or about January 19, 2011, SAMUEL PIERRE, the

defendant, voluntarily agreed to speak to me and told me, among other things, the following, in substance and in part:

a. PIERRE previously worked as an immigration specialist for the Congressman where his duties included contacting DHS to inquire about the status of constituents' immigration-related matters.

b. PIERRE has known KENOL JANVIER, the defendant, since PIERRE was a child.

c. In or about the summer 2008, PIERRE appeared as a guest on JANVIER's Radio Show to talk about immigration matters related to the Haitian community but stated on air that he was not allowed to take money for providing immigration assistance.

d. JANVIER's Cellphone was provided to listeners during JANVIER's Radio Show because PIERRE did not want to field multiple calls from listeners.

e. After JANVIER's Radio Show, JANVIER referred approximately 15-20 callers who had immigration issues to PIERRE. PIERRE spoke to some of these callers from his office telephone at the Congressman's Office. At least three of these callers came to see PIERRE at the Congressman's Office to complain that they had given money to JANVIER to help them with their immigration matters but had not received any such assistance.

f. JANVIER brought certain immigration-related paperwork and/or Alien Numbers for individuals whom had sought immigration-related assistance from JANVIER to PIERRE and/or gave such individuals PIERRE's office telephone number. PIERRE would assist such individuals by sending an e-mail to the Congressional liaison at DHS to inquire about the status of such individuals' immigration issues.

g. PIERRE told JANVIER that he could not accept cash gifts as a government employee but JANVIER bought PIERRE clothes and paid for dinner on at least several occasions during the time period relevant to this Complaint.

h. JANVIER paid PIERRE approximately \$300 in cash to help him with his green card application. In connection with such application, PIERRE wrote a letter from the Congressman's Office to DHS.

i. PIERRE gave me his cellphone number, which was the same number as PIERRE's Personal Cellphone.

22. By engaging in the above-described conduct, from in or about May 2008 up to and including in or about December 2008, SAMUEL PIERRE and KENOL JANVIER, the defendants, engaged in a conspiracy to and did accept and solicit, respectively, money and things of value for attempting and/or promising to assist certain individuals with immigration-related matters pending before DHS.

WHEREFORE, deponent respectfully requests that warrants be issued for the arrests of SAMUEL PIERRE and KENOL JANVIER, the defendants, and that they be arrested and imprisoned or bailed, as the case may be.



ERIN P. ZACHER
Special Agent
Federal Bureau of Investigation

Sworn to before me this
23rd day of July, 2013



HONORABLE GABRIEL W. GORENSTEIN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK