

UNITED STATES DISTRICT COURT
for the
Eastern District of California

United States of America)

v.)

Jatinbhai Naresh Bhakta, and)
Roy Gene Drees)

Case No. 5:21-mj-00004-JLT

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 22, 2019 to January 22, 2021 in the county of Kern in the
Eastern District of California, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Row 1: 18 USC 1952(a)(3), Travel in interstate or foreign commerce or use of the mail or any facility in interstate or foreign commerce, with intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of any unlawful activity.

This criminal complaint is based on these facts:

See Attached Affidavit of Federal Bureau of Investigation Special Agent David Hunter incorporated here.

[X] Continued on the attached sheet.

[Handwritten signature of David Hunter]

Complainant's signature

David Hunter, Special Agent

Printed name and title

Affidavit submitted via email/pdf and attested to me as true and correct by telephone consistent with Fed.R.Crim.P. 4.1 and 41(d)(3).

Date: 01/22/2021

[Handwritten signature of Jennifer L. Thurston]

Judge's signature

City and state: Bakersfield, CA

Jennifer L. Thurston - Chief U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

**Affidavit in Support of Criminal Complaint Against
Jatinbhai BHAKTA
Roy DREES**

I, David L. Hunter, a special agent with the Federal Bureau of Investigation (FBI), being duly sworn, state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since December of 2010. I am currently assigned to the Sacramento Division, Bakersfield Resident Agency. While employed by the FBI, I have investigated federal criminal violations related to human trafficking, child exploitation and child pornography, in addition to a number of other federal violations. I have gained experience through training at the FBI Academy, other FBI-related trainings, and daily work related to investigations involving the sexual exploitation of minors and human trafficking. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §2116, and I am authorized by the United States Attorney General to request a search warrant.

2. As a Special Agent of the FBI, I have worked on this investigation, along with other FBI agents, as part of a joint investigation with Homeland Security Investigations (HSI), the Bakersfield Police Department (BPD), and the Parole Division of California Department of Corrections and Rehabilitation (Parole). This affidavit includes information discovered through

various investigative actions taken by members of this team as part of this investigation.

3. This affidavit is submitted in support of a criminal complaint and application for an arrest warrant for the individuals **Jatinbhai BHAKTA** (DOB: 07/05/1991) and **Roy DREES** (DOB: 01/04/1976). Specifically, it is believed by the FBI and HSI that **BHAKTA** and **DREES** have used a facility of interstate or foreign commerce for the purpose of promoting, managing, establishing, carrying on and facilitating the unlawful activity of prostitution, pimping, and pandering under California law in violation of Title 18 U.S.C 1952(a)(3). As articulated below, there is probable cause to believe that **BHAKTA** and **DREES** have committed multiple violations of this statute which would support the issuance of arrest warrants for these individuals.

4. I am familiar with the facts and circumstances of the investigation through my personal participation, from my discussions with witnesses and other law enforcement officials involved in the investigation, and from my review of records and reports relating to the investigation. Since this affidavit is being submitted for the limited purpose of establishing probable cause for issuance of a criminal complaint, I have not included details of every aspect of the investigation. I have set forth only those facts that I believe are necessary to establish probable cause to show violations of Title 18 U.S.C. 1952(a)(3).

II. APPLICABLE LAWS AND DEFINITIONS

5. This investigation concerns violations of the following statutes:

a) **Title 18 U.S.C. Section 1952(a):** Whoever travels in interstate or foreign commerce or uses the mail or any facility in interstate or foreign commerce, with intent to (1) distribute the proceeds of any unlawful activity; or (2) commit any crime of violence to further any unlawful activity; or (3) otherwise promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on of any unlawful

activity.

b) As explained in **Title 18 U.S.C. Section 1952(b)**, “unlawful activity” includes prostitution offenses in violation of the state in which they are committed.

III. STATEMENT OF PROBABLE CAUSE

6. In March of 2019, a multi-agency investigation was initiated after receiving multiple reports of possible sex trafficking at the Desert Star Motel, located at 516 S. Union Ave., Bakersfield, CA. Jatinbhai BHAKTA, the owner of the Desert Star Motel, is believed to have utilized his property to facilitate sex trafficking, including the sex trafficking of minors. Prior investigation, surveillance, and multiple undercover operations have revealed that the Desert Star Motel is essentially operating as a brothel. Bakersfield Police Department (BPD) officers have responded to multiple calls for service at this location regarding human trafficking and prostitution-related crimes.

7. Physical street surveillance of the Desert Star revealed that the motel appears to primarily cater to prostitutes and their potential clients. The Desert Star Motel is accessed directly from Union Avenue via a long driveway extending to a retractable iron gate, which appears to be permanently left open, allowing access into the motel’s parking lot. Customers will drive through this open gate, where they encounter a main office building and then several motel rooms facing north into the driveway/parking lot. There are no motel rooms or driveways on the south side of the building. Depending on the time of day, it is not unusual to see most, if not all, of the rooms’ doors wide open with suspected prostitutes in lingerie standing outside, waving to drivers and approaching their vehicles. Prospective customers will park directly in front of the room of the prostitute they choose, at which time the prostitute will either direct them into the room immediately or meet the customer outside to arrange a deal. There are

approximately 20 to 25 rooms available for rent, most of which are occupied by prostitutes, with very few, if any, used for legitimate overnight residency. According to others in the motel industry, a motel room at the Desert Star and located on Union Ave. would legitimately cost between \$35 and \$50 per night.

8. **BHAKTA** purchased the Desert Star Motel in early 2015. **BHAKTA** appears to be an on-site resident of the motel, living in a unit attached to the main entrance of the motel. He has two vehicles: a Silver BMW M6 with license plate 8HPE442 and a Black Toyota Tundra with license plate 71279U2, both registered in his name at the Desert Star Motel. His DMV records indicate that he has listed the Desert Star Motel as his residence. Physical surveillance of **BHAKTA**, his vehicles, and his movements indicate that the Desert Star Motel are his primary residence. **DREES** also resides at the Desert Star Motel and he is employed at the Desert Star Motel by **BHAKTA** as a handyman and general manager. He lives in a room attached to the front office, as confirmed by Parole Officer Kevin Ross, who has performed numerous parole inspections at the premises, due to **DREES**'s criminal record and registration as a sex offender.

PROSTITUTION ARRESTS AND VICTIM RECOVERIES

9. On December 6, 2018, officers responded to the Desert Star Motel for a report of kidnapping/human trafficking in which a victim, RW, was identified, along with her pimp, Kenneth HATLEY.

10. On December 13, 2018, James YORK was arrested for pimping and pandering a female in Bakersfield. A search warrant on YORK's Facebook private message content revealed messages from YORK to other pimps describing the Desert Star Motel as a "Blade", which, in my experience, is a common term used by pimps and prostitutes referring to a street or location where prostitution is blatant and rampant.

11. On January 4, 2019, the Bakersfield Police Department conducted an undercover prostitution sting at the Desert Star Motel and arrested TS for prostitution. It was subsequently determined that a subject identified as Carlos CASTEEL was pimping TS out of the Desert Star Motel daily for financial gain.

12. On March 6, 2019, BPD officers responded to the Desert Star Motel for a report of human trafficking and kidnapping. Upon arrival, officers contacted SC, the victim. It was subsequently determined that SC was being forced into prostitution at the Desert Star Motel by her pimp, Rayshoun MILLER, who also kidnapped her 3-month old son to use as leverage against her in order to compel her to continue prostituting against her will. Her son was recovered later that night in Fresno, CA by HSI Fresno. The child was in the residence of MILLER's sister, who denied having any awareness of the situation with SC, in spite of several phone calls to SC, wherein she refused to give SC the child's location and threatened SC not to talk to the police because "you knew what you were getting into." The receipt of these calls was witnessed by law enforcement in SC's presence. The child was removed from the Fresno residence and turned over to Child Protective Services. MILLER and another prostitute associated with him, Marshai ROBERSON, were subsequently arrested for kidnapping and human trafficking.

13. On May 16, 2019, the Bakersfield Police Department conducted a human trafficking investigation originating at the Desert Star Motel involving two 15-year-old girls, CV1 (born in 2003, aged 15 at time of encounter) and CV2 (born in 2003, aged 16 at time of encounter). CV1 was encountered at the Desert Star Motel, attempting to engage in prostitution with an undercover officer. A subsequent interview of CV1 revealed that she was a victim of human trafficking by her pimp, Darnell EDWARDS. Four cellphones were seized by the

Bakersfield Police Department as a result of the investigation. BPD Detectives Brian West and Frank McIntyre interviewed CV1. The following was revealed by CV1, in summary:

- a. CV1 saw social media posts on Snapchat from CV2, who indicated that she was making a lot of money while engaging in prostitution. CV1 stated that she sent CV2 a message, asking CV2 to “put her on.” CV1 defined this statement as wanting CV2 to show her how to make money. CV1 stated that CV2 told her that she knew of a “little trap” in Bakersfield. [CV1 told detectives that “little trap” is a place to make money. I also know that a “trap” is a place to make money while engaging in prostitution.]
- b. CV1 had a tattoo of crown atop a letter “D”, located above her right eye. CV1 admitted that the “D” was the name of her and CV2’s pimp (later identified as EDWARDS). She also referred to him as “Big Daddy” or “Diamond.” CV1 stated that EDWARDS told her to get her hair and nails done, and to purchase new clothes. EDWARDS then took her and CV2 to the Desert Star Motel and rented a room for their use.
- c. CV1 stated that she saw EDWARDS enter the front office and speak with the owner, “Jay” (BHAKTA). BHAKTA charged EDWARDS \$180 for one room with two girls, for two nights. CV1 stated that EDWARDS instructed her and CV2 to make \$500 a day; all of the prostitution proceeds went to EDWARDS. CV1 further stated that if she and CV2 met their \$500 goal, that EDWARDS would take them out to eat and allow them to take a break; however, they were not allowed to sleep or take a break until they made the \$500 each day. CV1 also added that they stayed at the Desert Star Motel for about one week and a

weekend, engaging in prostitution every day while there. All of the funds went to EDWARDS, and in return, he provided food, the room, clothes, and marijuana.

- d. CV1 stated that she and CV2 left the Desert Star Motel with EDWARDS for a few days, traveling to Antioch, CA and then back to the Desert Star Motel.

During this time, EDWARDS arranged for CV1 to have her face tattooed with the crown and "D" tattoo seen on CV1's face. Upon their return to the Desert Star Motel, BHAKTA charged EDWARDS \$250 per night, due to the fact that they were both minors.

- e. CV1 was shown a photo line-up, during which CV1 pointed to the photograph of EDWARDS and stated: "my pimp is him."
- f. When asked if she had a way of communicating with "Jay", CV1 provided the cell phone number (661) 496-XXXX.

14. CV1 gave consent for investigators to make a forensic image of her cellular phones. According to Detective West's report, CV1 made several voice and video chat calls to CV2, in order to identify her and EDWARDS' location, as EDWARDS and CV2 were not encountered at the motel by BPD, having left just moments prior to BPD's arrival. Detective West obtained a state of California child emergency phone ping order for CV2's cell phone global positioning system and geolocation data. Data analysis showed the device to be in Antioch, California, near the America's Best Inn.

15. Detective West subsequently contacted the Antioch Police Department (APD) and provided EDWARDS and CV2's physical descriptions. APD Officer Marcotte made contact with EDWARDS, noting that he also had a letter "D" with a crown tattooed on his forehead. APD officers also encountered CV2. EDWARDS was taken into custody by APD and booked into Contra Costa West County Jail. CV2 was taken to child social services, although she fled the vehicle during transit. APD officers seized two cellphones, one belonging to EDWARDS

and the other belonging to CV2.

16. On May 20, 2019, Detectives West and McIntyre responded to the Contra Costa West County Jail to interview EDWARDS. During this interview, EDWARDS was advised of his Miranda warnings, to which he responded “Yes” as having understood and being willing to speak with investigators at that time. Detective West asked EDWARDS if he stayed at the Desert Star Motel, to which he responded “Hell, no.” Detective West told EDWARDS that “people know him” at the hotel, “people that work there.” EDWARDS responded, “Ok,” and stated that he had just picked someone up from there, meaning CV2. EDWARDS then stated that he wanted an attorney before answering any questions. EDWARDS was subsequently arrested and indicted in the Eastern District of California on October 25, 2019 and November 07, 2019, respectively, and is currently pending two charges of violations of 18 USC 1591—Sex Trafficking of Minors.

17. On June 17, 2020, BPD, HSI, and FBI conducted an undercover human trafficking sting operation at the Desert Star Motel. Plain clothes BPD detectives posed as potential “Johns” (the street parlance for customers in search of the services of a prostitute) and entered the Desert Star Motel separately. They were individually approached by SV, TR, and YS. Each detective separately entered the female’s room, where the following commercial sex acts were offered: SC offered Det. Poteete vaginal sex for a fee of \$100; TR offered Det. Jones “full service”, which included vaginal sex and oral sex, for \$50; and YS offered oral sex to Det. Woods for a cost of \$40. The women were arrested and cited for prostitution and interviews were attempted at that time. At that time, all women denied having pimps and claimed that they were working independently. On July 31, 2020, TS met with FBI and HSI once again and agreed to an interview:

- a) TR confirmed that she did, indeed, have a pimp by the name of Douglas BESS JR., who was incarcerated in a California State Correctional Facility for pimping and pandering. TR and BESS had been talking since May 1, 2020 and, on May 17, 2020, TR got his name tattooed on her person. Upon losing her unemployment benefits, BESS

convinced TR to travel from Fresno, CA to Bakersfield, CA in order to engage in prostitution: specifically, to the Desert Star Motel. BESS convinced her that it would be a temporary arrangement until she received unemployment benefits again. BESS stated that he knew “people” at the Desert Star Motel, and that it was the safest place to prostitute in Bakersfield. He instructed TR not to charge less than \$150 for sex acts, and to earn \$1200 per day.

b) TR traveled to the Desert Star Motel in late May or early June of 2020. Upon arrival, she went to the front office where she encountered a man she identified as “Jay”. “Jay” appeared to know BESS as, upon being told that TR would be prostituting for BESS, he seemed skeptical. He stated that he knew BESS was in prison and asked how TR could be prostituting for BESS if he was incarcerated. TR showed “Jay” her tattoo, and he agreed. “Jay” charged TR \$120 a night for the room. TR found this rate unreasonable, as the room was “shitty”, but she paid “Jay” every day. The first two days, she walked the payment up to the front office. After that, a man she identified as “The Cleaning Guy” told her that she didn’t need to walk up there, as “Jay” would come around to the room every day to collect her money. After that, TR would wait for “Jay” to come to the room to collect the money. On an occasion where she didn’t have sufficient money, he told her “not to worry about it” as she could give him the money once she’d earned it.

c) TR stated that “Jay” appeared to know what was going on, as he would come around every day, and would hang around the doorways into the rooms and talk with the women in the rooms for periods of time. TR also stated that the Desert Star Motel was very obviously used for prostitution. She stated that all she had to do was open her hotel room door or window and men would approach looking for sex. BESS posted online advertisements for commercial sex on behalf of TR, but she said that she didn’t need them, as clients simply drove into the motel.

d) While at the Desert Star Motel, TR and another Unidentified Female (UF) went to

the front office to meet with “Jay.” While there, UF purchased a couple of pills that TR identified as “E Pills.” They were in the shape of “Hello Kitty” and were identified as being Ecstasy. TR stated that “Jay” had a large bag of such pills in assorted shapes in the front office for sale. He told TR and UF that they will “keep you moving.” He also had small bags of what TR recognized as “coke” (cocaine) and “crystal” (methamphetamine) for sale to the women at the Desert Star Motel.

e) TR described the front office as not looking like a traditional motel office. There was no credit card machine or cash register. The front office appeared to be where “The Cleaning Guy” lived, as it was set up like a motel room.

18. On October 2, 2020, BPD did an undercover human trafficking sting at the Desert Star Motel focused on A.A., a prostitute who had been identified as being pimped by Elijah Cotton MCGRAW via Facebook and Snapchat search warrant returns. At approximately 0830 hours, undercover BPD detectives approached A.A., who was standing outside of her room #20. When they approached her, she asked if they wanted sex. When asked how much, she responded “\$50.” She then attempted to grab BPD Det. Poteete on his groin. At this time, law enforcement identified themselves, and she was taken into custody. Seized incident to her arrest was an iPhone in a red case, which was in her hand at the time of this encounter. During interview, she admitted to prostituting for quite a while, but denied having a pimp. During a search warrant on her phone, however, the following conversations were discovered in her phone as part of her messages:

a) On June 22, 2020, A.A. conversed with a contact named “Big Chili Baba” with phone number (559-794-0560). This phone number was found to be associated with Elijah MCGRAW and was associated with a phone found in MCGRAW’s possession during an unrelated arrest. In this conversation, MCGRAW stated: “I’m a pimp I break on bitches.”

b) On July 3, 2020, MCGRAW texted A.A.: “Bitch y yo phone off? Weird ass bitch. I don’t wana hear no lame as excuse or nothing bitch u got me fukd up. Weird ass

bitch you playing around phone dead and I done sent the money to yo fukn car. Phone dead mean u ain't working either lol." When she says she didn't respond because she was washing, he says "Watever send that 200 to my cash app" and "Jus stfu and worry bout a date."

c) On June 29, 2020, A.A. texted MCGRAW about a dress code instituted at the Desert Star: "this is ridiculous...then jay keep telling me to change...like fukkk". When MCGRAW asked what she meant, she responded: "No see thru...he [BHAKTA] said man come on yall know the cops is on me...but shit idk tf im not getting no dates ima be naked...and it ain't only me tho. nun these bitches is getting nun."

d) On June 26, 2020, A.A. texted BHAKTA's phone telling BHAKTA that she was on her way. He asked what time she would arrive and she said: "30 mins". He responded: "Cool. Which room do u want." She asked for room 20 and he responded "Perfect. I'll have it ready." A.A. had several similar conversations on June 30, 2020, August 17, 2020, and September 14, 2020, wherein she inquired about renting a room. On September 30, 2020, BHAKTA texted her the words: "Dress Code."

e) On June 23, 2020, A.A. texted MCGRAW, complaining about another female in the motel starting trouble. She then complained: "she all coo with Roy. he gon say u remember the rules? Don't step on anybody's toes." She asked if she could beat the other girl up, and MCGRAW told her to keep her cool.

f) On June 29, 2020, A.A. told MCGRAW: "Jay keep telling me to change." MCGRAW said "what u serious. what the shirt"? She responded: "No see thru. He said man cmon yall know the cops is on me. But shit idk tf im not getting no dates ima be naked."

19. On December 11, 2020, a 14-year-old female (AP) was found prostituting at the Desert Star. AP had been reported missing by her mother in Los Angeles County. AP was still in contact with her sister (HP), however, and AP told HP that she was making good money "tricking" in Bakersfield and that "my nigga Jamal" was looking out for her and promising to

buy her a car. LE were provided with the phone number 661-557-5491 as the number being used by AP to communicate with HP. Law enforcement did cell tower location pings of this phone number. The radius of the pings was around 365 and 420 meters at pinged around the 200 block of Union Ave and the 300 block of Liggett Street. BPD knew that the Desert Star was within this radius and a common place of prostitution and knocked on the doors of the motel rooms in order to ascertain if AP was in one of the rooms. Few individuals answered their doors, none of which were AP. During this time, AP called her sister and said she couldn't talk right then, because the cops were outside and knocking on her door. Based on these statements, BPD got a search warrant for the rooms of the motel and executed a search warrant. BPD was provided keys for the room by **BHAKTA**; however, the key for Room #5 was found not to work, and the door had to be forced open. AP was recovered inside. During interview, she was uncooperative, and she was found to have hidden a flip phone in her pants, which she then broke in half when detectives attempted to seize it.

20. On December 23, 2020, a 17-year-old female (KR) was brought to the hospital by another prostitute (BC). KR had been staying in room #20, and BC along with her sister (EC) were in room #21. BC and EC had witnessed throughout the 22nd and 23rd a female pimp (Javonna LEWIS) screaming at KR about KR not earning enough money and sleeping instead of "taking dates." On one occasion, LEWIS began hitting KR outside of the hotel room and pushed her, half-dressed, toward Union Ave, which is a common area for street prostitution. This altercation was recorded by Jonathon Elijah MATTHEWS (a pimp observed on pole camera footage various times between April 2020 and January 2021) and shared on Snapchat, which was witnessed by law enforcement later that evening. At some point in the afternoon of December 23rd, LEWIS took a chair leg and sodomized KR vaginally and anally. BC, who had not witnessed the sodomization, returned to her hotel room and saw KR standing in the parking lot, bleeding. BC asked **BHAKTA** to assist her in getting KR to the hospital, but he said no, claiming he didn't want to get blood on his car seats. BC took KR to the hospital, at which point BPD was contacted and an investigation initiated. During an interview with BC, the following

was learned regarding **BHAKTA** and his operation of the Desert Star Motel:

- a) **BHAKTA**, known by BC as “Jay”, charges \$140 per night if one girl is in the room, \$200 if two girls are sharing. According to BC, he previously charged \$120 a night, but had to make up for lost income due to being closed for a week for renovations. This closure was observed by law enforcement on pole camera surveillance during the week of November 4th, 2020. BC stated that if a payment was late, it would be an extra \$20. **BHAKTA** would come around every day between 10:30 am and 11:30 am to collect his money.
- b) BC said that **BHAKTA** would lay down the rules of the motel, which stated that if girls got into fights with each other, they would be kicked out for 3 months. If girls got beaten by clients or their pimps, he would do nothing as that was “part of the game.” BC, who claimed not to have a pimp, stated that MATTHEWS had tried to barge into her room and demand that she pimp for him. When BC complained to **BHAKTA**, he told her to “get a pimp or get a gun.” She expressed concern that she couldn’t escape from the room if somebody attacked her, because the back windows were barred.
- c) BC also stated that **BHAKTA** had a security/surveillance system installed throughout the motel. **BHAKTA** would claim to be able to see everything the girls were doing, and would warn them that he was watching them if they broke the rules. BC said that **BHAKTA** lives in the front manager’s area and that, while she had been checking in, she had seen that he had multiple screens that showed the security footage from throughout the motel. She stated that she didn’t know if the footage was actually recorded, or if it was live visual only.
- d) When asked about underage prostitution, BC said that she didn’t know that KR was under 18 at the time of the incident. She said that **BHAKTA** would try and look at renters’ identification upon renting out the rooms. She said that, on this occasion, she did not provide her driver’s license to **BHAKTA** and refused to show him her own identification when he asked. **BHAKTA** chose not to pursue the matter with her and let

her rent a room without showing him her identification. BC claimed to have confronted **BHAKTA** about how he could rent to KR when she was a minor if he had truly been checking identifications. **BHAKTA** stated that the room had actually been rented by LEWIS.

TOLL ANALYSIS FOR (661) 748-2725 ASSOCIATED WITH ROY DREES

21. On September 19, 2019, a review of the top 25 toll record contacts from T-Mobile for number (661) 748-2725 was conducted, for the date range of 4/4/2019 - 8/22/2019. Utilizing open source tools, search queries were performed for online prostitution ads utilizing the phone numbers in contact with the target phone, identified by subscriber information as belonging to Roy **DREES**. A review of the toll records revealed four of the top 25 phone numbers in contact with the target number, were associated with online prostitution ads. Further analysis revealed 37 different phone numbers were in contact with the target phone number. These numbers were connected to 3,065 online prostitution ads.

FORENSIC REVIEW OF VICTIM K.H.'S MOBILE PHONE

22. Between October 11, 2019, and October 15, 2019, an evidentiary review of an extraction of an Apple A1633 IPHONE 6S, owned by human trafficking victim "K.H." was performed. A contact with the name "Roy" with telephone number (661) 748-2725, was present on the device. The subscriber of the device was identified as Roy **DREES**.

REVIEW OF ROY DREES'S MOBILE PHONE

23. On October 31, 2019, Department of Adult Probation and Operations conducted "Operation Boo." This was a preventative operation targeting registered sex offenders with a goal of deterring and preventing offenders from interacting with minors during Halloween. It was subsequently discovered that Roy **DREES** was an Operation Boo target, as **DREES** was convicted in 2000 for a felony violation of California Penal Code (PC) 288(A) LEWD OR LASCIVIOUS ACTS WITH A CHILD UNDER 14 YEARS OF AGE, and was under parole supervision in October 2019 relating to PC 290.018 (b) for failure to register as a sex offender.

24. Probation advised **DREES**'s dwelling, which was listed as 516 South Union Avenue, Bakersfield, California (also known as the Desert Star Motel), his digital devices, and personal effects would be subject to search during a parole contact.

25. Operation Boo agents subsequently responded to the Desert Star Motel and made contact with **DREES**. **DREES** was handcuffed by parole agents and searched for contraband. During the search, **DREES**'s phone was reviewed for the presence of contraband. No child exploitative images or videos were observed on **DREES**'s phone, however, several text message conversations involving the acquisition of rooms by unknown individuals and **DREES** were discovered:

October 6, 2019 Text Message Conversation between DREES and 209-702-3374

209-702-3374 - can you take me to the train at 12:20

October 27, 2019 Text Message Conversation between DREES and 209-702-3374

209-702-3374 - I'm on my way from LA, is there any rooms in the front

DREES - Yes

October 28, 2019 Text Message Conversation between DREES and 209-702-3374

209-702-3374 - I'm on my way from the bay

October 28, 2019 Text Message Conversation between DREES and "Shannon"

6:59 AM - Shannon - don't give my room away okay I'm telling you now I do not give my room away please;

7:36 PM - Hey Roy I might be coming down there tomorrow so just try to save 23 for me okay.

ATTEMPTED UNDERCOVER INTERACTION

26. On January 14, 2020, HSI and FBI sent a confidential informant to the Desert Star Motel, with the purpose of attempting to solicit a prostitute from **BHAKTA** himself. The informant drove into the motel and drove through the parking lot, observing females leave their

rooms and attempt to approach his vehicle. One female approached him, and said: “What’s up, baby? I’m ready for you... Do you want some? Come in my room.” When the informant stated that he was looking for something else, she told him to come back on the weekends, as there would be more girls available. He asked her how much she charged, and she responded: “Sixty dollars, until you finish.” He instead returned to the motel’s main office, where he encountered an Indian male that he later confirmed to be **BHAKTA**. He asked **BHAKTA** for a “girl”, to which **BHAKTA** initially stated that he “can’t help you with that.” After the informant told **BHAKTA** that he had been told by a friend that the Desert Star was the place to find prostitutes, **BHAKTA** responded to the effect of: “I can’t talk about that. You can drive in if you want, but that’s on you.”

INTERACTIONS BETWEEN BHAKTA AND SUSPECTED PIMPS AND PROSTITUTES

27. Forensic review of CV1’s phone revealed the following conversation between herself and EDWARDS on May 12, 2019 through May 13, 2019, referencing “Jay”:

CV1: *Good Morning....I had to give Jayy \$100 for the trap but he wants more*

Yea. I’m busting sum good dates today daddy

My dates all tryna come back lol

I paid \$170 for the room Nd she paid \$80 so we straight....I only got \$774 now but ima touch ah band fashoo

Kall me when u wake up babyy I’m already past ah band but Ima stay up all night Nd get as much as I can daddy

[In my experience, a “band” is street parlance for a thousand dollars.]

28. On March 22, 2019, an interview was conducted with Mukesh **BHAKTA**, Jatinbhai **BHAKTA**’s uncle, who also owns a motel. During this interview, **MUKESH** identified an Instagram account that he stated was his nephew’s: “jatinthegreat.” During this interview, **MUKESH** also stated that he believed the standard rate for a motel like the Desert Star

Motel on Union Ave. would be between \$35 and \$50 per night. On May 2, 2019, BPD executed a California state search warrant on Instagram account "jatinthegreat". This Instagram account was found to be associated with phone number (661) 496-XXXX and email address "indnballer91@aol.com." During the analysis of the search warrant return, the following conversations were recovered from BHAKTA's private direct messages between himself and an Instagram user known as "Will_forreal," and later identified as William GARRISON:

a) On June 22, 2018:

GARRISON: *Damn bro my bitch got bit all up in that room u gave her that's not worth 120 bro. I thought u fix that problem bro u need to call out pest control that shit is serious*

BHAKTA: *Guy. She wanted that trap room. I have brand new renovated rooms she don't want room in back and I checked bed. Looks fine guy. When she stand outside all day lol come on guy I'm on my shit guy*

b) On June 26, 2018:

BHAKTA: *Send a deuce with Dez next time. I'll take it off room*

GARRISON: *Ok. Wock or tech. Only*

BHAKTA: *40 a line...so she give me 40 for room n we good Author*

GARRISON: *U will never get no red or wok for \$40 a line from me where they do that at? Let me know so I can buy it all*

BHAKTA: *Ok ok don't play me tho. Free room.*

c) On December 12, 2018:

GARRISON: *I'm on my way give the bitch a blunt for me till I come wit a wood. Ask her did she make her room money?*

BHAKTA: *She left in a taxi. She didn't pay nada*

GARRISON: *Lol ok that bitch don't got no phone. Was she making money?*

BHAKTA: *She used Roy [DREES] phone and for sure she busted a few. Last night and this morning.*

d) On April 12, 2019:

GARRISON: *Man you told on me when I came through all the bitches ran in close the doors and didn't open til I left. Totally different from the last time I came in there*

BHAKTA: *Tfu mean I TOLD Nigga. I didn't tell shit.*

GARRISON: *Smh loose lips sink ships*

BHAKTA: *I don't even know who her nigga is. She won't tell me or give me his number. Bitch hella loud and outta pocket.*

[In my experience, it is not uncommon for prostitutes and pimps to refer to pimps as “Niggas”, particularly in relation to prostitution being organized by African-American criminal street gang members and affiliates. The term “out of pocket” is also a phrase used by pimps and prostitutes to refer to a prostitute who is not acting in accordance with her pimp’s instructions.]

29. As stated in Paragraph 13(f), BHAKTA’s phone number was identified by CV1 as (661) 496-XXXX. On November 4, 2019 and March 20, 2020, 30-day court-ordered geolocation ping orders were implemented for the purpose of assisting in conducting physical surveillance on BHAKTA. During this time, the phone ping locations for phone number (661) 496-XXXX matched BHAKTA’s observed movements at the Desert Star Motel and various locations around Bakersfield, including while BHAKTA was driving in his registered vehicles.

30. As part of the investigation, toll records were ordered from AT&T, the carrier for telephone number (661) 496-XXXX. These toll records spanned the following time periods: October 1, 2018 through April 2, 2019; March 26, 2019 through September 2, 2019; March 22, 2020 through June 21, 2020; and June 22, 2020 through July 14, 2020. During these requested periods, 249 phone numbers were identified as having had communication with BHAKTA. Investigators used law enforcement tools which mine and analyze open source, current and historic commercial sex advertisements recovered from various advertising sites on the internet. These 249 phone numbers were found to be associated with 29,977 posted advertisements for commercial sex. That is, online posted advertisements for commercial sex listed these phone numbers as contact numbers for potential customers to use in order to schedule meetings with the

pictured prostitute. These numbers were associated with multiple advertisements, of multiple individuals, but posted as being available in various areas, including Bakersfield, San Diego, and Las Vegas, NV. In my experience, this indicates that advertisers of these commercial sex acts were moving the same woman or women to various locations, and then using the same photographs and contact numbers to duplicate advertisements in their new location.

31. During toll record analysis of **BHAKTA**'s phone number, **BHAKTA** was found to have contact with two numbers: 1) (559) 721-9929, and 2) (559) 575-1101. The first number was found to be associated with a female named Shandis **BUTLER** and the second was associated with Jonathon **HAMPTON**. Between May 9, 2019 and July 14, 2020, **BUTLER** communicated with **BHAKTA**'s phone number 74 times. On May 10, 2020, **HAMPTON** had telephone communications with **BHAKTA**, as well. Further investigation revealed that **BUTLER** had sent **HAMPTON** \$850 via wire transfer on July 19, 2020. The phone number associated with **BUTLER** was also found to be associated with online sex service advertisements on an online prostitution solicitation website. These advertisements, spanning August 11, 2020, through September 1, 2020, showed an individual using the name "Lexii" with various photographs of her in revealing clothing and poses. The background of these photographs show what appear to be the rooms and room entrance of the Desert Star. She listed her location on these advertisements as being in the Bakersfield, CA area. On December 9, 2020, Jonathon **HAMPTON** was involved in a drive-by shooting at the Desert Star, during which he was injured in the parking lot. This altercation was also seen on pole camera surveillance.

POLE CAMERA SURVEILLANCE

32. Beginning on or around April 1, 2019, a pole camera was installed on a City of Bakersfield light pole on Union Ave., in order to observe the main entrance of the Desert Star Motel. A second camera was subsequently installed to the North side of the property to observe the parking lot and its adjacent rooms. During this time, agents observed the following:

- a) All of the rooms in the Desert Star Motel appeared to be occupied by one or more females, who were generally dropped off in various vehicles by various males. These

males did not stay in the motel rooms, but would leave shortly after dropping off the females, occasionally returning to the motel to drop off what appeared to be food or shopping bags, before leaving again.

b) These females would occupy the rooms for a few days at a time, before being picked up by the aforementioned males and leaving. Many of these females would be brought back to the motel several days or weeks later by the same males.

c) Customers, or “Johns”, would drive through the main gate and slowly drive along the north side of the motel. The female occupants of the rooms would step out of their respective rooms and stand in front of their doors and/or windows. These females would generally be provocatively dressed, often wearing only very short shorts and bras or tops that exposed their upper bodies.

d) If a vehicle paused in front of a particular female or room, the female would approach the vehicle and speak with the driver through the vehicle window. Often, they could be seen pointing to their rooms. The customer’s vehicle would then park, and a male would subsequently exit his vehicle and walk into the room. Ten to fifteen minutes later, the male would exit the room, get back into his vehicle, and then drive away without returning.

e) This pattern would occur roughly 3 or 4 times an hour, per female, per room.

f) No attempts at discretion or camouflage were attempted in any way. Multiple females would consistently loiter and wander inside and outside of the motel rooms and in the parking lot. During a busy period, the parking lot would be crowded with provocatively dressed prostitutes, pimps, and customers, freely moving around the parking lot and rooms.

33. **BHAKTA** and **DREES** were also witnessed interacting with various males who were in the process of dropping off females, and many of these males were subsequently identified as having criminal histories of pimping and pandering:

a) On multiple occasions between April 1, 2019, and May 7, 2019, pole camera

surveillance revealed that an individual resembling **BHAKTA**, can be seen communicating with scantily-clad females (suspected prostitutes) on the premises. In addition, **BHAKTA** appears to be accompanied by an individual resembling **DREES** on multiple occasions, in the presence of suspected prostitutes.

b) On April 13, 2020, a white Ford with license plate number 8JDK673 was seen on pole camera surveillance driving into the Desert Star Motel and dropping off one female. During this time, Roy **DREES** approaches the female and speaks with her at her room door, as well as the driver, who is an as-yet unidentified black male. After being dropped off at the motel, one of the females is seen talking to a customer and directing him to her room. On May 12, 2020, **DREES** was observed cleaning out the contents of this same white Ford.

c) On April 16, 2020, two vehicles are seen entering the Desert Star Motel: a green BMW with license plate number 6FLA800 and a black BMW with license plate number 5TLV715. The driver of the black BMW was subsequently identified as Edwin **STOVALL**. Both vehicles were seen dropping off females at the Desert Star Motel. **BHAKTA** is seen on the pole camera surveillance approaching **STOVALL** and the unidentified driver of the green BMW and speaking with both of them outside of their vehicles. A few minutes later, the green BMW leaves, and **DREES** approaches the vehicle to speak with the driver through the driver's side window. Phone number 661-662-7037 was found to be associated with **STOVALL**. This phone number was also found to be in contact with **BHAKTA** via analysis of **BHAKTA**'s toll records.

d) On May 6, 2020, a silver Mercedes with license plate number 8CCU911 arrived at the Desert Star Motel. The driver of this vehicle was later identified as Jody Dean **GAY**. **GAY** was found to have phone number (213) 224-5522 associated with him. This phone number was also found to have been in contact with **BHAKTA** via **BHAKTA**'s cell phone toll records. He was seen again at the Desert Star Motel on May 29, 2020. **GAY** was found to have a prior conviction for California Pimping and Pandering

violations. Also seen on May 6, 2020, arriving with GAY was a white BMW with license plate number 6WMZ288. A black male was seen exiting the vehicle with two females. This male was later identified as Elijah McGRAW.

e) On May 6, 2020, a silver BMW X3 with no visible license plate pulls into the Desert Star driveway with two females. **BHAKTA** is seen approaching the vehicle and speaking with the driver, who is a female with dyed pink hair. The vehicle pulls into the parking lot in front of a room. Later, the pink-haired female is seen approaching a customer and directing him into the room.

f) On May 11, 2020, a black Lexus with license plate number #AC92H79 arrives at the Desert Star Motel and drops off a Hispanic female. The driver was identified as Andwele SHABAZZ. On May 12, 2020, the female was observed approaching multiple vehicles in the parking lot and entering her room with at least one suspected customer. A cell phone number of 559-400-4311 was subsequently found to be associated with SHABAZZ. This phone number was also found to have contacted **BHAKTA**'s cell phone, via **BHAKTA**'s toll records.

g) On May 14, 2020, a white Audi with license plate #AB54L21 arrives at the Desert Star Motel. Two as-yet unidentified black males pull in front of a room and a female is dropped off. **DREES** is seen approaching the vehicle and talking with the driver.

h) On June 18, 2020, a silver Scion with license plate #8HKA796 arrives at the Desert Star Motel. The driver of this vehicle was identified as Jonathan MATTHEWS. **DREES** is seen speaking with MATTHEWS on the pole camera surveillance. MATTHEWS has a history of violation of California Pimping and Pandering law, and was seen multiple times at the Desert Star Motel, including May 7th, May 29th, and July 16th, 2020.

i) On July 16, 2020, **BHAKTA** is seen driving his BMW out of the parking lot. As he is leaving, a black female approaches him, wearing only underwear and has a conversation with him through the driver's side window.

34. Additionally, **BHAKTA** is seen on the pole camera surveillance visiting each room individually and speaking with the female occupants within, appearing to collect money from various females. This behavior was witnessed on various dates including April 1, 2020, July 15, 2020, and October 19, 2020.

35. On August 17, 2020, a grey Chevrolet Impala bearing Colorado license plate OAK635 was observed, via pole camera, at the Desert Star Motel. The driver, a black male, approximately 25 years old (suspected pimp), was observed dropping off a female with black hair (suspected prostitute) at one of the motel rooms near the middle of the property. Vehicle registration information revealed the owner to be EAC Holdings, LLC (Enterprise Rental Car). The male driver appeared to be Anthony Cotton (referenced above) and was observed having a conversation with **DREES**.

36. On October 20, 2020, at approximately 10:49 AM, a maroon Mercedes 4-door sedan bearing California license plate 8TFN180 (suspected pimp vehicle) was observed parked between two open motel room doors near the rear of the Desert Star Motel (Desert Star). **BHAKTA** was observed engaging in a conversation with the occupant of the vehicle, a black male (suspected pimp), for several minutes. The male exited the vehicle and continued to have a conversation with **BHAKTA**. **DREES** was also observed entering and exiting one of the open motel rooms next to the vehicle. During this time, at approximately 10:52 AM, a black female (suspected prostitute) was observed entering and exiting the second open motel room door next to the vehicle and a Hispanic male (suspected customer) was observed entering the room.

37. Pole camera surveillance as of the date of this affidavit, has revealed the same, consistent activities ongoing at the Desert Star Motel.

IV. SEARCH WARRANT AT THE DESERT STAR MOTEL

38. On January 22, 2021, a federal search warrant was executed for the premises of the Desert Star Motel. During the execution, approximately fifteen prostitutes were encountered in various rooms of the motel, along with three identified pimps. Indicia of prostitution was

discovered in the rented-out rooms, such as condoms and lingerie. Multiple females encountered by law enforcement admitted that they worked at the motel as prostitutes. They stated that the Desert Star was a great place to make money, and that **BHAKTA** was well aware of the prostitution going on. They stated that **BHAKTA** charged between \$80 and \$140 per night. When they stated that the rooms were not worth that amount of money, he responded with “You’ll make it back anyway.” **BHAKTA** expected a dress code of no lingerie in order to avoid attention from law enforcement. One encountered female admitted that she had heard about the Desert Star being a good place to engage in prostitution as far away as Texas. The female occupants also identified **DREES** as a cleaner for the Desert Star, as well as booking in the girls when they arrive at the front desk. Both **DREES** and **BHAKTA** were interviewed separately, after they were advised of and waived their Miranda rights. **DREES** and **BHAKTA** both acknowledged that prostitution was occurring regularly at the Desert Star and that they enforced a dress code in order to avoid attention from law enforcement.

V. CONCLUSION

39. Based on the foregoing, I request that the court issue this complaint and arrest warrants. There is probable cause to believe that **BHAKTA** and **DREES** have used a facility of interstate or foreign commerce for the purpose of promoting, managing, establishing, carrying on and facilitating the unlawful activity of prostitution, pimping, and pandering under California law in violation of Title 18 U.S.C 1952(a)(3). **BHAKTA** and **DREES** have both been involved in the promotion of prostitution, in association with various identified pimps and prostitutes, who were found to be engaging in prostitution via online advertisements as well as in person at the Desert Star Motel.



David L. Hunter, Special Agent
Federal Bureau of Investigation

Affidavit submitted by email/pdf and attested to me as true and accurate by telephone consistent with Fed.R.Crim.P. 4.1 and 41(d)(3).

January 22, 2021



Honorable Jennifer L. Thurston
CHIEF UNITED STATES MAGISTRATE JUDGE

Approved as to form.

/s/ David Gappa

David Gappa