

No.

CR 13 00 690 LHK

PSG

FILED
OCT 17 2013

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SEALED BY ORDER
OF THE COURT

SAN JOSE DIVISION

THE UNITED STATES OF AMERICA
vs.

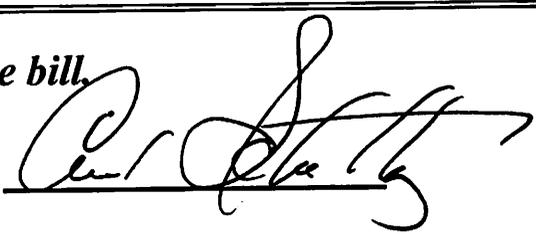
JAMAL RAPHAEL BROUSSARD

A/K/A "Flyyy Mal", A/K/A "Money Mal", A/K/A "Maly Bo"

INDICTMENT

SEE ATTACHMENT

A true bill.



Foreperson

Filed in open court this 16th day of OCTOBER

A.D. 2013

Pres. [Signature]

UNITED STATES MAGISTRATE JUDGE

Bail. \$ no bail arrest warrant.

U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

1 MELINDA HAAG (CABN 132612)
United States Attorney

SEALED BY ORDER
OF THE COURT

2
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4 **FILED**

5 OCT 17 2013

6 RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
7 NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

SG

LHK

11
12 UNITED STATES OF AMERICA

CR 13 00690 CASE NO.

13 Plaintiff,

14 v.

15 JAMAL RAPHAEL BROUSSARD,
16 A/K/A "FLYYY MAL,"
17 A/K/A "MONEY MAL"
18 A/K/A "MALY BO",
19 Defendant.

VIOLATIONS: 18 U.S.C. §§ 1591(a) and 1594(a) –
Sex Trafficking of Children; 18 U.S.C. §§ 2423(a)
and (d) – Transportation of Minors For Prostitution;
18 U.S.C. §§ 2422(a) and (b) – Coercion and
Enticement for Prostitution

20 INDICTMENT

21 The Grand Jury charges:

22 INTRODUCTORY ALLEGATIONS

23 At all times relevant to this Indictment:

- 24 1. Defendant JAMAL RAPHAEL BROUSSARD, a/k/a/ "Flyyy Mal," a/k/a/ "Money Mal," a/k/a/
25 "Maly Bo," ("BROUSSARD") was a resident of Hercules, California, and was born in 1990.
26 2. The minor female "R.W." was a resident of San Jose, California, and born in 1995.
27 3. The minor female, "M.H.," was a resident of Richmond, California, and born in 1996.

28 INDICTMENT

1
2 COUNT ONE (18 U.S.C. §§ 1591(a)(1) and(2), 1594(a) – Sex Trafficking of Children)

3 Between on or about August 2010, and on or about February 2012, within the Northern District
4 of California and elsewhere, defendant JAMAL RAPHAEL BROUSSARD, in and affecting interstate
5 commerce, knowingly did recruit, entice, harbor, transport, provide, and obtain by any means a minor
6 female, that is “R.W.,” knowing that force, fraud, or coercion would be used to cause “R.W.” to engage
7 in commercial sex acts, knowing that “R.W.” had not attained the age of 18 years and would be caused
8 to engage in commercial sex acts, and did benefit financially and by receiving anything of value from
9 participation in a venture engaged in such acts, in violation of Title 18, United States Code, Sections
10 1591(a)(1) and (2) and 1594(a);

11
12
13 COUNT TWO (18 U.S.C. §§ 1591(a)(1) and(2), 1594(a) – Sex Trafficking of Children)

14 Between on or about December 2011, and on or about May 2013, within the Northern District of
15 California and elsewhere, defendant JAMAL RAPHAEL BROUSSARD, in and affecting interstate
16 commerce, knowingly did recruit, entice, harbor, transport, provide, and obtain by any means a minor
17 female, that is “M.H.,” knowing that force, fraud, or coercion would be used to cause “M.H.” to engage
18 in commercial sex acts, and knowing that “M.H.” had not attained the age of 18 years and would be
19 caused to engage in commercial sex acts, and did benefit financially and by receiving anything of value
20 from participation in a venture engaged in such acts, in violation of Title 18, United States Code,
21 Sections 1591(a)(1) and (2) and 1594(a).

22
23
24 COUNT THREE (18 U.S.C. § 2423(a) and (d) – Transportation of Minors For Prostitution)

25 On or about January 2012, within the Northern District of California and elsewhere, defendant
26 JAMAL RAPAHHEL BROUSSARD, for the purpose of private financial gain, did knowingly and
27 willfully transport or arrange, induce, procure, or facilitate the travel of “R.W.,” who had not attained
28 the age of 18 years, in interstate commerce, from California to Maryland, with the intent that “R.W.”

1 would engage in prostitution and other sexual activity for which a person could be charged with a
2 criminal offense, and aided and abetted such conduct, in violation of Title 18, United States Code,
3 Sections 2 and 2423(a) and (d).

4
5
6 COUNT FOUR (18 U.S.C. § 2423(a) and (d) – Transportation of Minors For Prostitution)

7 On or about October 2012, within the Northern District of California and elsewhere, defendant
8 JAMAL RAPHAEL BROUSSARD, for the purpose of private financial gain, did knowingly and
9 willfully transport or arrange, induce, procure or facilitate the travel of “M.H.,” who had not attained the
10 age of 18 years, in interstate commerce, from California to New Mexico, with the intent that “M.H.”
11 would engage in prostitution and other sexual activity for which a person could be charged with a
12 criminal offense, in violation of Title 18, United States Code, Sections 2 and 2423(a) and (d).

13
14
15 COUNT FIVE (18 U.S.C. § 2422(a) and (b) – Coercion and Enticement for Prostitution)

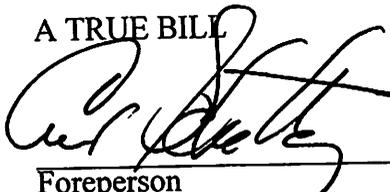
16 On or about February 2012, within the Northern District of California and elsewhere, defendant
17 JAMAL RAPHAEL BROUSSARD, using a facility or means of interstate commerce, knowingly
18 persuaded, induced, or enticed “R.W.,” a minor who had not attained the age of 18 years, to travel in
19 interstate commerce, from Maryland to New Mexico, or attempted to do so, with the intent that “R.W.”
20 would engage in prostitution and other sexual activity for which a person could be charged with a
21 criminal offense, in violation of Title 18, United States Code Section 2422(a) and (b).

22
23
24 COUNT SIX (18 U.S.C. § 2422(a) and (b) – Coercion and Enticement for Prostitution)

25 On or about January 2013, within the Northern District of California and elsewhere, defendant
26 JAMAL RAPHAEL BROUSSARD, using a facility or means of interstate commerce, knowingly
27 persuaded, induced, or enticed “M.H.,” a minor who had not attained the age of 18 years, to travel in
28 interstate commerce, from California to Louisiana, or attempted to do so, with the intent that “M.H.”

1 would engage in prostitution and other sexual activity for which a person could be charged with a
2 criminal offense, in violation of Title 18, United States Code Section 2422(a) and (b).

3
4 DATED: 10/16/13

5 A TRUE BILL
6 
7 _____
8 Foreperson

9 MELINDA HAAG
10 United States Attorney

11 
12 JEFFREY NEDROW
13 Assistant United States Attorney
14 Chief, San Jose Branch

15 (Approved as to form: 
16 AUSA AMIE D. ROONEY

SEALED BY ORDER

OF THE COURT

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

OFFENSE CHARGED

SEE ATTACHMENT

FILED OCT 17 2013

- Petty
 Minor
 Misdemeanor
 Felony

PENALTY: SEE ATTACHMENT RICHARD W. WIEKING CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN JOSE

CR 13

DEFENDANT - U.S.

JAMAL RAPHAEL BROUSSARD, A/K/A "Flyyy Mal", A/K/A "Money Mal", A/K/A "Maly Bo"

DISTRICT COURT NUMBER

00690

CR

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form Melinda Haag

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) AUSA AMIE D. ROONEY

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges
2) Is a Fugitive
3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
5) On another conviction } Federal State
6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: NO BAIL

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: Before Judge:

Comments:

ATTACHMENT TO PENALTY SHEET

U.S.

v.

**JAMAL RAPHAEL BROUSSARD,
A/K/A “Flyyy Mal”, A/K/A “Money Mal”, A/K/A “Maly Bo”**

COUNT ONE & TWO: 18 U.S.C. §§ 1591(a)(1) and(2), 1594(a) – Sex Trafficking of Children

Penalties:

Maximum Sentence: Life
Mandatory Minimum: 15 years
Maximum Fine: \$250,000
Special Assessment: \$100
Maximum Supervised Release: 5 years
Mandatory Registration as Sex Offender

COUNT THREE & FOUR: 18 U.S.C. § 2423(a) and (d) – Transportation of Minors for Prostitution

Penalties:

Maximum Sentence: 30 years
Mandatory Minimum Sentence: 10 years
Maximum Fine: \$250,000
Special Assessment: \$100
Maximum Supervised Release: 5 years

COUNT FIVE & SIX: 18 U.S.C. § 2422(a) and (b) – Coercion and Enticement for Prostitution

Penalties:

Maximum Sentence: life
Mandatory Minimum Sentence: 10 years
Maximum Fine: \$250,000
Special Assessment: \$100
Maximum Supervised Release: 5 years

SEALED BY ORDER
OF THE COURT

United States District Court
Northern District of California

FILED

OCT 17 2013

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

CRIMINAL COVER SHEET

Instructions: Effective January 3, 2012, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case. Please place this form on top of the Defendant Information Form.

Case Name:

Case Number:

USA v. JAMAL RAPHAEL BROUSSARD, A/K/A "Flyyy Man", A/K/A "Money Man", A/K/A "Maly Bo"

CR 13 00690 LUK

Total Number of Defendants:

Is This Case Under Seal?

1 2-7 _____ 8 or more _____

Yes No _____

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Venue (Per Crim. L.R. 18-1):

Yes _____ No

SF _____ OAK _____ SJ

Is this a death-penalty-eligible RICO Act gang case?

Assigned AUSA (Lead Attorney):

Yes _____ No

AUSA AMIE D. ROONEY

Comments:

[Empty rectangular box for comments]

Date Submitted:

October 16, 2013

PRINT

1 MELINDA HAAG (CABN 132612)
United States Attorney

2 J. DOUGLAS WILSON (DCBN 412811)
3 Chief, Criminal Division

4 AMIE D. ROONEY (CABN 215324)
Assistant United States Attorney

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6 San Jose, California 95115
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8 FAX: (408) 535-5066
9 Amie.rooney@usdoj.gov

Attorneys for United States of America

FILED

OCT 17 2013

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

SEALED BY ORDER
OF THE COURT

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CR 13

00690

LHK

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 JAMAL RAPHAEL BROUSSARD,
17 A/K/A "FLYYY MAL,"
18 A/K/A "MONEY MAL"
19 A/K/A "MALY BO",
Defendant.

CASE NO.

**ORDER OF THE COURT SEALING
INDICTMENT AND ARREST WARRANT**

22 The government hereby moves the Court for an order sealing the indictment, arrest warrant, this
23 motion, and the Court's sealing order until further order of the Court because the defendant has not yet
24 been arrested and the investigation and efforts to locate the defendant are ongoing.

25 //
26 //
27 //
28 //

RECEIVED
CLERK OF COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE
1

1 The United States requests copies of the sealed indictment, arrest warrant and this Application and
2 Order.

3
4 DATED: October 15, 2013

Respectfully submitted,

MELINDA HAAG
United States Attorney

6
7 
8 AMIE D. ROONEY
Assistant United States Attorney

9
10 ~~[PROPOSED]~~ ORDER

11 Based upon the motion of the government and for good cause shown, IT IS HEREBY
12 ORDERED that the indictment, arrest warrant, this motion, this sealing order, and all related papers
13 shall be sealed until further order of the Court. The Clerk of the Court is ordered to furnish copies of
14 these documents to the United States Attorney's Office and to Special Agents of the Federal Bureau of
15 Investigation.

16
17 DATED: 10.16.13

18 
19 HONORABLE PAUL S. GREWAL
20 United States Magistrate Judge
21 Northern District of California
22
23
24
25
26
27
28