

No.

CR 13 00 690 LHK

PSG E-filing

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

INDICTMENT

SEE ATTACHMENT

A true bill.



Foreperson

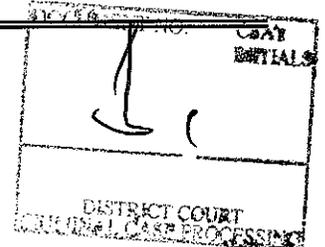
Filed in open court this 16<sup>th</sup> day of OCTOBER

A.D. 2013

*Pres. [Signature]*

UNITED STATES MAGISTRATE JUDGE

Bail. \$ no bail arrest warrant.



**ATTACHMENT TO INDICTMENT COVER**

**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

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

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

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MELINDA HAAG (CABN 132612)  
United States Attorney

SEALED BY ORDER  
OF THE COURT

**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  
SAN JOSE DIVISION

PSG

LHK

**CR 13 00 690**

UNITED STATES OF AMERICA ) CASE NO.

Plaintiff,

v.

JAMAL RAPHAEL BROUSSARD,  
A/K/A "FLYYY MAL,"  
A/K/A "MONEY MAL"  
A/K/A "MALY BO",  
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

INDICTMENT

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

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

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).

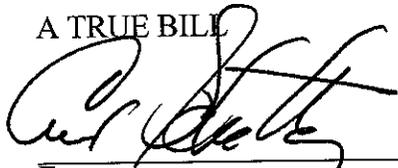
22  
23  
24 COUNT SIX (18 U.S.C. § 2422(a) and (b) – Coercion and Enticement for Prostitution)

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 \_\_\_\_\_  
13 JEFFREY NEDROW  
14 Assistant United States Attorney  
15 Chief, San Jose Branch

16 (Approved as to form:   
17 \_\_\_\_\_  
18 AUSA AMIE D. ROONEY

AO 257 (Rev. 6/78)

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  Petty  Minor  Misdemeanor  Felony

**FILED**  
OCT 17 2013  
RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

PENALTY: SEE ATTACHMENT

CR 13 00690 PSG LHK

DEFENDANT - U.S.  
JAMAL RAPHAEL BROUSSARD,  
A/K/A "Flyyy Mal", A/K/A "Money Mal", A/K/A "Maly Bo"  
DISTRICT COURT NUMBER

**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 re prosecution 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 }

**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

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

ADDITIONAL INFORMATION OR COMMENTS

**PROCESS:**  
 SUMMONS  NO PROCESS\*  WARRANT  
If Summons, complete following:  
 Arraignment  Initial Appearance  
Defendant Address:  
Date/Time: Before Judge:

Bail Amount: NO BAIL

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

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

E-filing

FILED

OCT 17 2013

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

SEALED BY ORDER  
OF THE COURT

United States District Court  
Northern District of California

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.

PSG

Case Name:

Case Number:

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

CR 13 00690 LHK

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:

Date Submitted:

[Empty box for comments]

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

5 150 Almaden Boulevard, Suite 900  
6 San Jose, California 95115  
7 Telephone: (408) 535-0910  
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

12 CR 13 00690 LHK  
13 UNITED STATES OF AMERICA, )  
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19 )

Plaintiff,

v.

JAMAL RAPHAEL BROUSSARD,  
A/K/A "FLYYY MAL,"  
A/K/A "MONEY MAL"  
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 //

AMIE D. ROONEY  
CLERK  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

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  
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