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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Honorable  
 : CRIMINAL COMPLAINT  
 v. : Mag. No. 14-3768  
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 JUAN FREDY HERNANDEZ-ZOZAYA : UNDER SEAL  
 and :  
 ELIZABETH ROJAS ROJAS :

I, Ronald Conyers, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations ("HSI"), and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached page and made a part hereof.

*Ronald Conyers*

\_\_\_\_\_  
Ronald Conyers, Special Agent  
HSI

Sworn to before me and subscribed in my presence,

September 17, 2014 at  
Date

\_\_\_\_\_  
Newark, New Jersey  
City and State

Honorable  
United States Magistrate Judge

*Theresa Goff*  
\_\_\_\_\_  
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

From on or about June 2, 2014, through on or about June 13, 2014, in Cumberland County, in the District of New Jersey and elsewhere, defendants JUAN FREDY HERNANDEZ-ZOZAYA and ELIZABETH ROJAS ROJAS did knowingly keep, maintain, control, support, employ and harbor an alien in pursuance of the importation of said alien into the United States, for the purpose of prostitution,

In violation of 8 U.S.C. § 1328.

COUNT TWO

From on or about June 2, 2014, through on or about June 13, 2014, in Cumberland County, in the District of New Jersey and elsewhere, defendants JUAN FREDY HERNANDEZ-ZAZOYA and ELIZABETH ROJAS ROJAS knowing and in reckless disregard of the fact that certain aliens had come to, entered and remained in the United States in violation of law, did knowingly and intentionally conceal, harbor and shield from detection such aliens, for the purpose of commercial advantage and private financial gain,

In violation of 8 U.S.C. § 1324(a)(1)(A)(iii) and (a)(1)(B)(i).

COUNT THREE

From on or about March 6, 2011 through on or about August 20, 2014, in Cumberland County, in the District of New Jersey and elsewhere, defendants JUAN FREDY HERNANDEZ-ZAZOYA and ELIZABETH ROJAS ROJAS did knowingly and intentionally conspire and agree with one another others, to commit certain offenses against the United States, specifically, to hold aliens in pursuance of the importation of said aliens into the United States, for the purpose of prostitution, and to keep, maintain, support, employ and harbor aliens, for the purpose of prostitution, in pursuance of such aliens' illegal importation into the United States for such purpose, contrary to 8 U.S.C. 1328.

In violation of 18 U.S.C. § 371.

ATTACHMENT B

I, RONALD CONYERS, am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations ("HSI") and have had experience and training sufficient to provide a basis for the opinions contained herein. I have knowledge of the following facts based upon my own investigation, my conversations with law enforcement personnel and others, my review of reports, documents, and items of evidence. 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. Throughout this Affidavit, where I assert that a statement was made, I was not necessarily the individual to whom the statement was made. Rather, information about the statement may have been provided by someone else (who may have had either direct or indirect knowledge of the statement) to whom I have spoken or whose information is set forth in reports I have reviewed. Such statements are among many statements made by others, and they are set forth in substance and in part, unless otherwise indicated. Similarly, information in this Affidavit resulting from surveillance, does not necessarily set forth my personal observations alone, but rather may have been provided to me by other law enforcement agents who observed the events described, and to whom I have spoken or whose reports I have read. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Based upon my investigation and my discussions with other individuals involved in this investigation, I have knowledge of the following facts:

1. Since at least as early as 2012, HSI has been investigating defendants JUAN FREDY HERNANDEZ-ZOZAYA ("HERNANDEZ") and ELIZABETH ROJAS ROJAS ("ROJAS") in connection with a chain of brothels located in various towns throughout the District of New Jersey, including but not limited to brothels located in New Brunswick, Trenton, Orange, Lakewood, Asbury Park and Bridgeton, New Jersey.<sup>1</sup> Over the course of this investigation, law enforcement officers have employed various investigative techniques, including but not limited to physical surveillance, the use of pole cameras,

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<sup>1</sup> Two separate brothels have been operating in New Brunswick, New Jersey. Two have been operating in Trenton, New Jersey, and at least two have been operated in Bridgeton, New Jersey.

confidential sources, and search warrants to monitor the activities of HERNANDEZ, ROJAS, and their co-conspirators, who operate the chain of brothels (the "ORGANIZATION") which employ undocumented aliens as prostitutes. The investigation has revealed that HERNANDEZ and ROJAS play leadership roles within the ORGANIZATION and employ their co-conspirators to help manage the day-to-day activities at the brothels.

2. Pole camera images outside one of the New Brunswick brothels reveal men entering through the front doorway of the brothel and exiting out the back, in a pattern inconsistent with normal residential usage of such a structure. While conducting surveillance, law enforcement officers have seen similar pedestrian traffic into and out of the ORGANIZATIONS other brothels, consistent with the locations being utilized as houses of prostitution. Additionally, the service of state search warrants has revealed that the targeted locations were being used as brothels. For example, in one particular incident, officers were able to observe a "customer" undressing in the presence of a female, in what appeared to be preparation for the two to engage in a sex act, as a search warrant was being executed.<sup>2</sup>

3. Agents and local law enforcement officers have conducted interviews of numerous employees of the ORGANIZATION who have witnessed HERNANDEZ's and ROJAS' activities first-hand. Witness interviews have corroborated the alien status of the prostitutes and the activities that take place within the brothels. Additionally, witness interviews, some of which are described below, have confirmed HERNANDEZ's and ROJAS' leadership roles in running the alien prostitution operation. More specifically, HERNANDEZ hires, fires and oversees individuals who manage the day to day activities at the brothels. ROJAS organizes, directs and schedules the prostitutes to work in the brothels.

4. Individual 1, who worked at one of the ORGANIZATION'S brothels, disclosed in an interview with law enforcement officers that he / she was hired by HERNANDEZ to perform tasks in furtherance of a brothel's operation. Individual 1, whose information has been

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<sup>2</sup> On or about March 6, 2011, two state search warrants were executed on the Organization's brothels located in New Brunswick, New Jersey. On or about June 13, 2014 and on or about November 23, 2013, state search warrants were executed on the Organization's brothels located in in Bridgeton, New Jersey. Evidence collected in the course of these searches has confirmed that these locations were indeed brothels, where undocumented aliens were employed as prostitutes.

proven to be reliable, stated he / she has witnessed HERNANDEZ hiring and firing other employees, such as house operators, whose task it is to run the day to day operations at the brothels. Individual 1 stated he /she directly reported to HERNANDEZ. Individual 1 stated that he / she witnessed HERNANDEZ and ROJAS collect the proceeds from the prostitution activities, and that others have collected the proceeds at HERNANDEZ's direction.

5. Individual 2, who has worked as a prostitute in one of the ORGANIZATION's brothels. Individual 2 stated that she was scheduled to work in the brothel by ROJAS. She also stated that she had been directed to the brothel by ROJAS, who encouraged her to use the train originating in New York to get there.<sup>3</sup> Individual 2 verified that she was an illegal alien and ROJAS was aware of this fact. Individual 2 stated that other prostitutes with whom she worked were similarly situated and this fact was widely known.

6. HSI agents have subpoenaed telephone records, utility records, wire remittance records and other documents to corroborate information provided by the witnesses. More specifically, these records show the brothel locations under the control of HERNANDEZ employees or associates. The records of wire transfers show ROJAS transferring tens of thousands of dollars to others. ROJAS has no known legitimate employment.

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<sup>3</sup> At the time she began working at the ORGANIZATION's brothel, Individual 2 resided in New York.