

Approved:


AMANDA KRAMER/REBECCA MERMELSTEIN
Assistant United States Attorneys

13 MAG 1133

Before: THE HONORABLE ANDREW J. PECK
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA

: SEALED COMPLAINT

- against -

: Violations of
18 U.S.C. §§ 1512(c),
1591(a), 1591(b)(1),
1952, 2423(d),
8 U.S.C. § 1326(a)

ISAIAS FLORES-MENDEZ,
a/k/a "Adrian Sanchez Mendez,"
a/k/a "Jesus Diaz-Rincon,"
a/k/a "Chelo,"

: COUNTY OF OFFENSE:
BRONX

BONIFACIO FLORES-MENDEZ,
a/k/a "Boni,"
a/k/a "Mota,"

JUANA LUCAS-SANCHEZ,
DAVID VASQUEZ-MEDINA,
CARLOS GARCIA-DE LA ROSA,
a/k/a "Choqui,"
a/k/a "Pirulo,"
a/k/a "Miguel,"

ALEJANDRO DEGANTE-GALENO,
a/k/a "Celestino Degante Galeno,"
a/k/a "El Zorro,"

MARIA BAUTISTA-PENA,
a/k/a "Maricruz,"

MIGUEL ANGEL CHE-VELIZ,
a/k/a "Miguelon,"

ISIDRO DEGANTE-GALENO,
a/k/a "Marcos,"
a/k/a "El Perro,"
a/k/a "Cachorro,"

MARGARITO DEGANTE,
a/k/a "Chachalaco,"

PANFILO FLORES-MENDEZ,
VALENTIN JIAMEZ-DOLORES,
FNU LNU,

a/k/a "Alberto Jesus
Martinez-Miranda,"
a/k/a "Barbas,"
a/k/a "Barbitas,"

Defendants.

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COUNTY OF NEW YORK)
STATE OF NEW YORK) ss.:
SOUTHERN DISTRICT OF NEW YORK)

ELVIN HERNANDEZ, being duly sworn, deposes and says that he is a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations ("HSI") charges as follows:

COUNT ONE
(Sex Trafficking)

1. From at least in or about September 2006, up to and including in or about 2007, in the Southern District of New York and elsewhere, ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," and JUANA LUCAS-SANCHEZ, the defendants, in and affecting interstate and foreign commerce, willfully and knowingly did recruit, entice, harbor, transport, provide, and obtain, by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in such acts, knowing that force, fraud, and coercion would be used to cause the person to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a) and (b)(1), to wit, ISAIAS FLORES-MENDEZ arranged for a woman ("Victim-1") to be smuggled to the United States from Mexico for the purpose of prostitution, and then ISAIAS FLORES-MENDEZ, BONIFACIO FLORES-MENDEZ, and LUCAS-SANCHEZ, used force, threats of force, and other means of coercion to compel Victim-1 to engage in prostitution against her will for their own financial gain.

(Title 18, United States Code,
Sections 1591(a) & (b)(1), and 2.)

COUNT TWO
(Sex Trafficking)

2. From at least in or about 2006, up to and including in or about 2008, in the Southern District of New York and elsewhere, DAVID VASQUEZ-MEDINA, the defendant, in and affecting interstate and foreign commerce, willfully and knowingly did recruit, entice, harbor, transport, provide, and obtain, by any means a person, and did benefit, financially and

by receiving anything of value, from participation in a venture which has engaged in such acts, knowing that force, fraud, and coercion would be used to cause the person to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a) and (b) (1), to wit, VASQUEZ-MEDINA used force, threats of force, and other means of coercion to compel a woman ("Victim-2") to engage in prostitution in several states against her will for his own financial gain.

(Title 18, United States Code,
Sections 1591(a) & (b) (1), and 2.)

COUNT THREE
(Interstate Travel for Prostitution)

3. In or about April 2013, in the Southern District of New York and elsewhere, BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, willfully and knowingly, for the purpose of commercial advantage and private financial gain, arranged, induced, procured, and facilitated the travel of a person knowing that such a person was traveling in interstate commerce for the purpose of engaging in illicit sexual conduct, to wit, BONIFACIO FLORES-MENDEZ induced the travel of a person ("Witness-1") to New York from out-of-state for the purpose of engaging in prostitution.

(Title 18, United States Code,
Sections 2423(d) and 2.)

COUNT FOUR
(Prostitution-Sex Trafficking Enterprise)

4. From in or about October 2012, up to and including on or about the date of the filing of this Complaint, in the Southern District of New York and elsewhere, ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," CARLOS GARCIA-DE LA ROSA, a/k/a "Choqui," a/k/a "Pirulo," a/k/a "Miguel," ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante-Galeno," a/k/a "El Zorro," MARIA BAUTISTA-PENA, a/k/a "Maricruz," ISIDRO DEGANTE-GALENO, a/k/a "Marcos," a/k/a "El Perro," a/k/a "Cachorro," MARGARITO DEGANTE, a/k/a "Chachalaco," VALENTIN JIAMEZ-DOLORES, FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," the defendants, together with others known and

unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States of America, to wit, use of facilities in interstate commerce for the promotion, management, and facilitation of a prostitution enterprise, in violation of Title 18, United States Code, Section 1952.

5. It was a part and an object of the conspiracy that ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," CARLOS GARCIA-DE LA ROSA, a/k/a "Choqui," a/k/a "Pirulo," a/k/a "Miguel," ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante-Galeno," a/k/a "El Zorro," MARIA BAUTISTA-PENA, a/k/a "Maricruz," ISIDRO DEGANTE-GALENO, a/k/a "Marcos," a/k/a "El Perro," a/k/a "Cachorro," MARGARITO DEGANTE, a/k/a "Chachalaco," VALENTIN JIAMEZ-DOLORES, FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," the defendants, and others known and unknown, knowingly would and did travel in interstate and foreign commerce and use the mail and a facility in interstate and foreign commerce, with intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on, of one or more unlawful activities, namely promoting prostitution and sex trafficking, in violation of New York Penal Law §§ 230.20 and 230.34, and thereafter would and did perform and attempt to perform an act to promote, manage, establish, carry on and facilitate the promotion, management, establishment, and carrying on of the unlawful activity.

6. In furtherance of the conspiracy and to effect the illegal object thereof, ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," CARLOS GARCIA-DE LA ROSA, a/k/a "Choqui," a/k/a "Pirulo," a/k/a "Miguel," ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante-Galeno," a/k/a "El Zorro," MARIA BAUTISTA-PENA, a/k/a "Maricruz," ISIDRO DEGANTE-GALENO, a/k/a "Marcos," a/k/a "El Perro," a/k/a "Cachorro," MARGARITO DEGANTE, a/k/a "Chachalaco," VALENTIN JIAMEZ-DOLORES, FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," the defendants, together with others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about October 30, 2012, ISAIAS

FLORES-MENDEZ had a telephone conversation with BONIFACIO FLORES-MENDEZ, during which they discussed which women were working in the Yonkers Brothel and the Poughkeepsie Brothel.

b. On or about April 15, 2013, BONIFACIO FLORES-MENDEZ, had a telephone conversation with a woman working, or being forced to work, as a prostitute, in which BONIFACIO FLORES-MENDEZ and the woman discussed when she would arrive in Manhattan to meet BONIFACIO FLORES-MENDEZ to be taken to work at a brothel.

c. On or about March 5, 2013, GARCIA-DE LA ROSA had a telephone conversation with BONIFACIO FLORES-MENDEZ about the fact that a customer interested in engaging in commercial sex with a woman working, or being forced to work, as a prostitute was waiting outside of a brothel.

d. On or about April 15, 2013, ALEJANDRO DEGANTE-GALENO and ISIDRO DEGANTE-GALENO had a telephone conversation about the delivery to a customer's residence of a woman working, or being forced to work, as a prostitute.

e. On or about April 21, 2013, BAUTISTA-PENA and ALEJANDRO DEGANTE-GALENO had a telephone conversation about the fact that a customer interested in engaging in commercial sex with a woman working, or being forced to work, as a prostitute was waiting at the door of his residence for the woman.

f. On or about February 26, 2013, MARGARITO DEGANTE had a telephone conversation with ALEJANDRO DEGANTE-GALENO about the fact that MARGARITO DEGANTE was on the corner distributing "chica cards" to solicit customers for women working, or being forced to work, as prostitutes.

g. On or about March 5, 2013, JIAMEZ-DOLORES had a telephone conversation with BONIFACIO FLORES-MENDEZ in which JIAMEZ-DOLORES agreed to allow a customer to engage in commercial sex with one of the women working, or being forced to work, in a brothel in exchange for a \$10 payment with the promise to pay the remaining \$20 the next day, as long as JIAMEZ-DOLORES recognized the customer.

h. On or about April 18, 2013, FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," and BONIFACIO FLORES-MENDEZ had a telephone

conversation, in which FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," agreed to tell a woman working, or being forced to work, as a prostitute that there was one customer waiting to come in, and that three more were on their way.

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

COUNT FIVE
(Possession of Child Pornography)

7. From in or about February 2013, up to and including in or about March 2013, in the Southern District of New York, CARLOS GARCIA-DE LA ROSA, a/k/a "Choqui," a/k/a "Pirulo," a/k/a "Miguel," the defendant, knowingly did possess, and access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material that contained an image of child pornography that had been mailed, and shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, GARCIA-DE LA ROSA possessed on his cell phone photographs containing child pornography.

(Title 18, United States Code, Section 2252A(a)(5)(B).)

COUNT SIX
(Obstruction of Justice)

8. In or about October 2012, in the Southern District of New York and elsewhere, ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," and MIGUEL ANGEL CHE-VELIZ, a/k/a "Miguelon," the defendants, willfully and knowingly corruptly altered, destroyed, mutilated, and concealed a record, document, and other object, and attempted to do so, with the intent to impair the object's integrity and availability for use in an official proceeding, and otherwise obstructed, influenced, and impeded an official proceeding, and attempted to do so, to wit, working under the direction of ISAIAS FLORES-MENDEZ, BONIFACIO FLORES-MENDEZ and CHE-VELIZ searched for, removed, and destroyed GPS tracking devices from vehicles used to commit the crimes charged in Counts Three and Four in order to

prevent the location tracking of several of the defendants and to make the evidence unavailable for use by law enforcement authorities in connection with a federal grand jury investigation.

(Title 18, United States Code, Sections 1512(c) and 2.)

COUNT SEVEN
(Illegal Reentry)

9. On or about November 18, 2012, in the Southern District of New York and elsewhere, PANFILO FLORES-MENDEZ, the defendant, being an alien, after having been denied admission, excluded, deported, and removed from the United States on or about November 29, 2010, unlawfully did enter and was found in the United States, without having obtained the express consent of the Attorney General of the United States or his successor, the Secretary for the Department of Homeland Security, to reapply for admission.

(Title 8, United States Code, Section 1326(a).)

COUNT EIGHT
(Illegal Reentry)

10. On or about May 29, 2009, in the Southern District of New York and elsewhere, JUANA LUCAS-SANCHEZ, the defendant, being an alien, after having been denied admission, excluded, deported, and removed from the United States on or about June 8, 2004, and on or about January 29, 2004, unlawfully did enter and was found in the United States, without having obtained the express consent of the Attorney General of the United States or his successor, the Secretary for the Department of Homeland Security, to reapply for admission.

(Title 8, United States Code, Section 1326(a).)

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

11. I have been employed as a Special Agent with HSI (and its predecessor, the Bureau of Immigration and Customs Enforcement ("ICE")) for approximately three years. During my tenure as a Special Agent with HSI, I have conducted and participated in numerous investigations of criminal activity,

including but not limited to, sex trafficking, alien harboring, violations of the Mann Act, transportation in aid of racketeering activity, money laundering, and illegal reentry, in violation of Title 18, United States Code, Sections 1591, 2421, 2422, 2423, 1952 and 1956, and Title 8, United States Code, Sections 1324 and 1326. Through my training, education and experience, I have become familiar with the manner in which sex traffickers coerce women to engage in prostitution, the means and methods by which such prostitution occurs, the methods of exchange and transfer of the proceeds of such prostitution, and the coded language used by sex traffickers and others engaged in the prostitution business.

12. The information contained in this affidavit is based upon my personal knowledge and my review of documents and records gathered during the course of this investigation, as well as information obtained, directly or indirectly, from other sources and agents, including information provided to me by witnesses who participated in conversations with the defendants. 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 the 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.

THE TENANCINGO-NEW YORK SEX TRAFFICKING NETWORK

13. Many sex traffickers live in and around Tenancingo, Mexico and traffic women from rural areas in and around Tenancingo, Mexico to New York, among other places. The traffickers often lure women to the United States one at a time by engaging them in romantic relationships and promising a better life in New York. After the women are smuggled from Mexico to New York by their traffickers, they are forced by the traffickers to begin working as prostitutes against their will under abhorrent conditions.

14. The victims are often beaten, threatened with physical harm to themselves and their family members, sexually assaulted, and verbally abused. In a typical day, a Mexican sex trafficking victim in New York will have sexual intercourse with 20 to 30 customers.

15. In some cases, the victims work in residential brothels - apartments or houses used as brothels for two to four

women, where a co-conspirator of the traffickers provides security. In such brothels, there is typically a public living room space, and a bedroom or bedrooms which are used for the actual commercial sex. Doormen or "steerers" typically collect the money from customers either at the entrance to the brothel or in the living room, after which the customers are directed to a bedroom to have sex with a woman working, or being forced to work, as a prostitute. In some cases, the steerers provide the customers with tickets or playing cards, which the customers provide to the women as proof of payment. Steerers also provide security for the brothel, prevent victims from fleeing, and work outside the brothel directing customers to the brothel. Brothels often attract customers by distributing "chica cards" ("chica" means "girl" in Spanish) - business cards containing the phone number of a contact for the brothel.

16. In other cases, the victims are forced to perform commercial sex at the customers' homes, which is referred to as a "delivery service." Drivers also attract customers by distributing chica cards. As a matter of course, in a delivery service the driver sets the appointments with customers or has a co-conspirator work as a dispatcher, receiving calls and directing the drivers to the customers' addresses.

17. In order to provide customers with variety, traffickers typically move their victims from brothel to brothel, often on a weekly basis. Traffickers do not limit themselves to brothels within a small geographical range. It is not unusual for victims of New York-based traffickers to work in brothels as far away as Delaware or Massachusetts.

18. Traffickers typically provide the victims with cell phones to contact brothels and drivers so that the traffickers themselves cannot be recorded committing the crime. Traffickers then monitor the victims' cell phone usage to ensure that the victims are not contacting family members or friends, because isolation is one tactic used by traffickers to maintain control over their victims. Nevertheless, and as described in further detail below, traffickers also use cell phones to communicate with brothels and with each other.

19. Generally, each customer pays \$30-\$35 for 15 minutes of sex. Of that \$30-\$35, \$15 typically goes to the driver (in the case of a delivery service) or to the brothel. The other \$15 goes to the victim, who is then typically forced to

give all of the proceeds to the trafficker.

20. The trafficker then frequently sends, or has his victims send, some of those proceeds to family members and associates in Mexico by wire transfer. Such transfers provide financial assistance to the sex traffickers' families and provide financial support to the sex traffickers themselves if and when they return to Mexico. Such financial transfers are also a method of storing and hiding the significant profits of sex trafficking from law enforcement. In order to effect the wire transfer, the wire remitter businesses typically require the sender to provide his name, address, and phone number, and in some cases, they require official photo identification. The recipient of the wire transfer is required to provide a name, address, and phone number in order to pick up the wired funds. In my experience, traffickers and their relatives and associates typically provide their true names, addresses, and phone numbers to the wire remitter companies because they want to ensure that the wire transfer is completed or, if not, that they can be contacted to resolve any issues.

21. In some instances, traffickers choose one of their respective victims to assist in the trafficking of other women. For example, some victims recruit, supervise, and direct new victims, and report to their respective traffickers on the activities and compliance of the new victims. These victims-turned-accomplices effectively work as enforcers for their traffickers either because they are coerced to engage in such conduct or because doing so will better their position with their traffickers and thereby decrease the abuse they suffer.

22. Traffickers typically provide their victims with condoms and birth control pills. If a victim is suspected of being pregnant, her trafficker will typically make the victim take the drug misoprostol, marketed as Cytotec. Cytotec is FDA-approved to prevent gastric ulcers, but it also causes uterine contractions and induces miscarriage. Traffickers give victims Cytotec to induce miscarriage so that the victims can continue working as prostitutes.

23. After periods of victimization - typically months or years - many victims manage to escape. Without legal status in the United States, without family or friends for support, without employment opportunities, and as a result of the trauma they have suffered, victims sometimes return to prostitution. In

those cases, the victims become effectively self-employed, keeping the \$15 per customer they previously had to turn over to their traffickers.

THE DEFENDANTS

24. ISAIAS FLORES-MENDEZ: At various times relevant to this Complaint, ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," the defendant, worked as a sex trafficker, using violence, threats of violence, and other means of coercion to force at least one woman - Victim-1 - to engage in prostitution against her will. ISAIAS FLORES-MENDEZ also operated at least four brothels located in the Southern and Eastern Districts of New York, at which women worked, and were forced to work, as prostitutes (the "Brothels"). ISAIAS FLORES-MENDEZ sent by wire transfer some of the proceeds of these crimes to his family in Mexico. On or about October 19, 2012, ISAIAS FLORES-MENDEZ was arrested by the New York City Police Department ("NYPD") under the name "Jesus Diaz," and charged with Possession of a Forged Instrument and ordered detained. A Mexican Consular ID seized from ISAIAS FLORES-MENDEZ at the time of his arrest bore the name "Jesus Diaz." On or about January 2, 2013, ISAIAS FLORES-MENDEZ was charged by complaint in this District with illegal reentry, in violation of Title 8, United States Code, Section 1326(a). (12 Mag 3262). On or about January 14, 2013, ISAIAS FLORES-MENDEZ was indicted on the same charge. (13 Cr. 31 (KBF)). ISAIAS FLORES-MENDEZ has been detained since in or about October 2012, and has been in the custody of the United States Marshals Service ("USMS") since in or about January 2013.

25. BONIFACIO FLORES-MENDEZ: At various times relevant to this Complaint, BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, a brother of ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," the defendant, worked as a sex trafficker, using threats of violence and other means of coercion to force at least one woman - Victim-1 - to engage in prostitution against her will. BONIFACIO FLORES-MENDEZ also operated the Brothels - scheduling women to work in the Brothels, transporting them to and from work, hiring drivers, doormen, and steerers for the Brothels, and taking calls from customers.

26. JUANA LUCAS-SANCHEZ: At various times relevant to this Complaint, JUANA LUCAS-SANCHEZ, the defendant, has worked as

a sex trafficker, aiding ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," the defendant, and BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," in their use force, threats of force, and other means of coercion to compel Victim-1 to engage in prostitution against her will. At other times, LUCAS-SANCHEZ has herself worked, or been forced to work, as a prostitute. LUCAS-SANCHEZ was deported twice in or about 2004, and subsequently reentered the United States without authorization.

27. DAVID VASQUEZ-MEDINA: At various times relevant to this Complaint, DAVID VASQUEZ-MEDINA, the defendant, worked as a sex trafficker, using violence, threats of violence, and other means of coercion to force at least one woman - Victim-2 - to engage in prostitution against her will. On or about October 17, 2012, VASQUEZ-MEDINA was arrested for Possession of a Forged Instrument and ordered detained. On or about January 7, 2013, VASQUEZ-MEDINA was charged with Illegal Reentry, in violation of Title 8, United States Code, Section 1326(a), and was subsequently indicted on the same charge (13 Cr. 128 (SAS)). VASQUEZ-MEDINA has been detained since in or about October 2012, and has been in the custody of the USMS since in or about January 2013.

28. CARLOS GARCIA-DE LA ROSA: At various times relevant to this Complaint, CARLOS GARCIA-DE LA ROSA, a/k/a "Choqui," a/k/a "Pirulo," a/k/a "Miguel," the defendant, worked as a driver for ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," and BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendants, transporting women working, or being forced to work, as prostitutes to and from the Brothels, or to outside customers, and also transporting customers to and from the Brothels for the purpose of engaging in commercial sex. GARCIA-DE LA ROSA also enticed a minor girl with whom he was engaged in a sexual relationship ("Minor Victim-1") to take pornographic photographs of herself and send them to GARCIA-DE LA ROSA, which he then possessed in the Southern District of New York.

29. ALEJANDRO DEGANTE-GALENO: At various times relevant to this Complaint, ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante Galeno," a/k/a "El Zorro," the defendant, worked as a driver, delivering to customers women working, or being forced to work, as prostitutes, for the purpose of engaging in commercial sex.

30. MARIA BAUTISTA-PENA: At various times relevant to this Complaint, MARIA BAUTISTA-PENA, a/k/a "Maricruz," the defendant, worked as a dispatcher, taking phone calls from people interested in having a woman delivered to them for the purpose of commercial sex, and then relaying the request and address to ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante Galeno," a/k/a "El Zorro," the defendant, who then delivered to the customers women working, or being forced to work, as prostitutes, for the purpose of engaging in commercial sex.

31. MIGUEL ANGEL CHE-VELIZ: At various times relevant to this Complaint, MIGUEL ANGEL CHE-VELIZ, a/k/a "Miguelon," the defendant, worked as a mechanic for ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," and BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendants. In that capacity, CHE-VELIZ swept vehicles for tracking devices that had been placed by federal law enforcement agents in connection with a federal grand jury investigation, and aided in the destruction of some of those tracking devices.

32. ISIDRO DEGANTE-GALENO: At various times relevant to this Complaint, ISIDRO DEGANTE-GALENO, a/k/a "Marcos," a/k/a "El Perro," a/k/a "Cachorro," the defendant, a brother of ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante Galeno," a/k/a "El Zorro," the defendant, worked as a driver, delivering to customers women working, or being forced to work, as prostitutes for the purpose of engaging in commercial sex.

33. MARGARITO DEGANTE: At various times relevant to this Complaint, MARGARITO DEGANTE, a/k/a "Chachalaco," the defendant, a nephew of ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante Galeno," a/k/a "El Zorro," and ISIDRO DEGANTE-GALENO, a/k/a "Marcos," a/k/a "El Perro," a/k/a "Cachorro," the defendants, worked as a driver, delivering to customers and/or brothels women working, or being forced to work, as prostitutes for the purpose of engaging in commercial sex.

34. PANFILO FLORES-MENDEZ: At various times relevant to this Complaint, PANFILO FLORES-MENDEZ, the defendant, a brother of ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," and BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendants, had illegally reentered the United States of America without authorization following his 2010 deportation.

35. VALENTIN JIAMEZ-DOLORES: At various times relevant to this Complaint, VALENTIN JIAMEZ-DOLORES, the defendant, worked as a doorman or steerer at a brothel run by ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," and BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendants, in Yonkers, New York. In that capacity, JIAMEZ-DOLORES manned the door at the brothel, collected payment from customers, and directed customers to bedrooms where the customers had commercial sex with women working, or being forced to work as prostitutes.

36. FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas": At various times relevant to this Complaint, FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," the defendant, worked as a doorman or steerer at a brothel run by ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," and BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendants, in Queens, New York. In that capacity, FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," manned the door at the brothel, collected payment from customers, and directed customers to bedrooms where the customers had commercial sex with the women working, or being forced to work as prostitutes.

THE BROTHELS

37. ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," the defendant, previously operated and utilized, and BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, presently operates and utilizes numerous residential brothels - apartments and houses where women work, and are forced to work, as prostitutes - throughout New York, including identified locations on Rose Street in Poughkeepsie, New York (the "Poughkeepsie Brothel"), on Seneca Avenue in Queens, New York (the "Queens Brothel"), on Elm Street in Yonkers, New York (the "Yonkers Brothel"), and on 1st Street in Newburgh, New York (the "Newburgh Brothel").

The Poughkeepsie Brothel

38. On or about January 24, 2013, a cooperating witness ("CW-1")¹ made an audio and video recording of the inside of the Poughkeepsie Brothel. In the recording, CW-1 enters the Poughkeepsie Brothel and sees a woman wearing lingerie seated on a couch. CW-1 asks a Hispanic male working in the Poughkeepsie Brothel if there are women of any other nationality available and is told that there are not, at which time CW-1 leaves.

39. During the course of this investigation, both ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," and BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendants, have been observed entering and leaving the Poughkeepsie Brothel, and BONIFACIO FLORES-MENDEZ has been observed delivering a woman to the Poughkeepsie Brothel.

40. In connection with this investigation, in February 2013 and April 2013, HSI obtained the following court orders authorizing interception of communications over cell phones used by various of the defendants charged herein:

a. On or about February 21, 2013, the Honorable Kimba M. Wood, United States District Judge, Southern District of New York, signed an order (the "February 2013 Order") authorizing the interception of wire communications occurring over the following cellular telephones: (1) the cellular telephone assigned call number (917) 686-4929, subscribed to by "Josee D. Lopezzz," and used primarily by BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant ("Intercepted Cellphone-1"); (2) the cellular telephone assigned call number (845) 764-7252, subscribed to by "Isabel Rodriguez" ("Intercepted Cellphone-2"); (3) the cellular telephone assigned call number (914) 619-7051, with no subscriber name provided, used primarily by BONIFACIO

¹ CW-1 pleaded guilty, pursuant to a cooperation agreement in this District, to charges including illegal reentry, social security fraud, narcotics distribution conspiracy, narcotics importation conspiracy, possessing a firearm in connection with a narcotic trafficking offense, and hostage-taking. CW-1 hopes to receive a reduced sentence as a result of his cooperation. To date, law enforcement agents dealing with CW-1 have found CW-1 to be credible and the information provided by CW-1 to be corroborated.

FLORES-MENDEZ ("Intercepted Cellphone-3"); (4) the cellular telephone assigned call number (718) 216-2596, subscribed to by "Marcos Degante" and used primarily by ISIDRO DEGANTE-GALENO, a/k/a "Marcos," a/k/a "El Perro," a/k/a "Cachorro," the defendant ("Intercepted Cellphone-4"); and (5) the cellular telephone assigned call number (347) 284-2648, subscribed to by "Alejandro Mendoza" and used primarily by ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante Galeno," a/k/a "El Zorro," the defendant ("Intercepted Cellphone-5") (collectively, the "Intercepted Cellphones").

b. On or about April 2, 2013, the Honorable Kimba M. Wood, United States District Judge, Southern District of New York, signed an order (the "April 2013 Order") authorizing the continued interception of wire communications occurring over Intercepted Cellphone-1, Intercepted Cellphone-3, and Intercepted Cellphone-5.

41. In calls intercepted on Intercepted Cellphone-1 and Intercepted Cellphone-3 pursuant to the February 2013 Order and the April 2013 Order, BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, engaged in conversations in which he discussed arranging for women to work in the Poughkeepsie Brothel and in which he discussed the Poughkeepsie Brothel with customers or potential customers. For example, on or about April 22, 2013, at approximately 12:54 p.m., BONIFACIO FLORES-MENDEZ spoke to a woman identified during the call as "Karen," ("Karen") who asked if BONIFACIO had "a girl for Monday . . . to the house in Newburgh." BONIFACIO responded that he did not have work in Newburgh, but that he had "the one for Poughkeepsie." Karen responded that she would take the week if BONIFACIO could give it to her.

42. Based on my training and experience and my familiarity with this investigation, including the video obtained by CW-1, the surveillance of ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," and BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendants, and the intercepted telephone calls in which BONIFACIO FLORES-MENDEZ arranges for women to work in Poughkeepsie and/or provides information to men about the brothel in Poughkeepsie, I believe that the Poughkeepsie Brothel is, in fact, a brothel, and that BONIFACIO FLORES-MENDEZ runs the Poughkeepsie Brothel.

The Queens Brothel

43. On or about December 6, 2012, law enforcement agents interviewed a customer of the Queens Brothel ("Customer-1"). During the interview, Customer-1 stated, in substance and in part, that the Queens Brothel was a brothel, and that Customer-1 had frequented the Queens Brothel on three occasions, most recently that day. Customer-1 said that at the brothel, an apparent employee collected \$30 from Customer-1, and directed him to a bedroom where he had sexual intercourse with a woman.

44. During the course of this investigation, BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, has been observed delivering women to the Queens Brothel.

45. In addition, in calls intercepted on Intercepted Cellphone-3 pursuant to the February 2013 Order and the April 2013 Order, BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, engaged in conversations in which he discussed customers of the Queens Brothel. For example, on or about April 22, 2013, at approximately 1:22 p.m., BONIFACIO FLORES-MENDEZ had a conversation with an individual not charged herein in which BONIFACIO FLORES-MENDEZ said that he had spoken to a customer who asked if BONIFACIO FLORES-MENDEZ was open, and that BONIFACIO FLORES-MENDEZ had originally said he was closed, but because the customer said he had been to [the brothel] before and knew where it was located on Seneca Avenue, BONIFACIO FLORES-MENDEZ told the customer to come.

46. Based on my training and experience, and my familiarity with this investigation, including the statements made by Customer-1, the surveillance of BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, and my review of summaries of the intercepted calls described above, I believe that the Queens Brothel is, in fact, a brothel, and that it is run by BONIFACIO FLORES-MENDEZ.

The Yonkers Brothel

47. On or about December 20, 2012, law enforcement agents interviewed a customer of the Yonkers Brothel ("Customer-2") and arrested VALENTIN JIAMEZ-DOLORES, the defendant, who waived his Miranda rights and provided a statement. Both Customer-2 and JIAMEZ-DOLORES stated, in substance and in part,

that the Yonkers Brothel was a brothel. JIAMEZ-DOLORES further explained that he manned the door of the Yonkers Brothel, and collected \$30 from each customer in return for a playing card, which the customers then gave to the women working in the brothel as payment for sex.

48. During the course of this investigation, BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, has been surveilled driving women to and from the Yonkers Brothel.

49. In addition, in calls intercepted on Intercepted Cellphone-1 and Intercepted Cellphone-3 pursuant to the February 2013 Order and the April 2013 Order, BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, engaged in conversations in which he discussed the Yonkers Brothel with customers or potential customers. For example, on or about April 22, 2013, at approximately 9:59 a.m., BONIFACIO FLORES-MENDEZ received a call on Intercepted Cellphone-3 from an unidentified male who asked, "what do you have in Yonkers," and BONIFACIO FLORES-MENDEZ responded, in substance and in part, that he had two Mexicans who were both good.

50. Based on my training and experience, and my familiarity with this investigation, including the information provided by "Customer-2" and VALENTIN JIAMEZ-DOLORES, the defendant, the surveillance of BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, and my review of summaries of the intercepted telephone calls described above in which BONIFACIO FLORES-MENDEZ arranges for women to work in Yonkers and/or provides information to men who are coming to Yonkers, I believe that the Yonkers Brothel is, in fact, a brothel, that BONIFACIO FLORES-MENDEZ runs the Yonkers Brothel, and that JIAMEZ-DOLORES works at the Yonkers Brothel.

The Newburgh Brothel

51. On or about January 10, 2013, law enforcement agents interviewed a customer of the Newburgh Brothel ("Customer-3"). During the interview, the customer stated, in substance and in part, that the Newburgh Brothel was a brothel, and that he had frequented the Newburgh Brothel approximately one to two times per month for the last four years. On or about January 17, 2013, Customer-3 made a consensual audio and video recording of the inside of the Newburgh Brothel. During the recording, Customer-3 enters the Newburgh Brothel and sees a Hispanic female emerge

from a back bedroom wearing lingerie and high heels. Customer-3 then tells the two men working in the Newburgh Brothel that he is not interested in the woman. Customer-3 then leaves the Newburgh Brothel.

52. Based on my review of GPS tracking data for Intercepted Cellphone-1 and Intercepted Cellphone-3 (both of which are known to be used by BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, as set forth below), I know that in April 2013, Intercepted Cellphone-1 and Intercepted Cellphone-3 were frequently in the vicinity of the Newburgh Brothel on, among other days, Saturdays and Mondays. Based on my training and experience, and my familiarity with this investigation, I believe that women working, or being forced to work, at the Newburgh Brothel are dropped off for a week of work on Monday and are picked up on Saturday. I further believe, based on the GPS tracking data described above, that BONIFACIO FLORES-MENDEZ is the person driving the women to and from the Newburgh Brothel from his residence in Queens, New York, during which trips BONIFACIO FLORES-MENDEZ drives through Bronx, New York.

53. In addition, in calls intercepted on Intercepted Cellphone-1 and Intercepted Cellphone-3 pursuant to the February 2013 Order and the April 2013 Order, BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, engaged in conversations in which he discussed arranging for women to work in the Newburgh Brothel. For example, on or about April 14, 2013, at approximately 10:54 a.m., BONIFACIO FLORES-MENDEZ spoke to Karen who said that she was "calling about the week starting tomorrow" and asked where she had to go. BONIFACIO FLORES-MENDEZ responded that she had to go to "Newburgh."

54. Based on my training and experience, and my familiarity with this investigation, including the recording obtained by Customer-3, the GPS tracking data, and my review of summaries of calls intercepted pursuant to the February 2013 Order and the April 2013 Order, I believe that the Newburgh Brothel is, in fact, a brothel, and that it is run by BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant.

SEX TRAFFICKING OF VICTIM-1

55. In 2012 and 2013 I interviewed Victim-1,² who, as set forth below, gave an account of her experience being forced to engage in prostitution as a result of force, threats of force, and coercion by an individual known to her as "Isaias Flores-Mendez." Victim-1 was shown a known photograph of ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," the defendant, and identified the person depicted in that photograph as the "Isaias Flores-Mendez" who caused Victim-1 to engage in prostitution against her will. Victim-1 also identified a known photograph of BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant.

56. Based on my interviews of Victim-1, I know the following:

a. ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," and BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendants, are brothers.

b. ISAIAS FLORES-MENDEZ and BONIFACIO FLORES-MENDEZ arranged for Victim-1 to be smuggled across the border from Mexico into the United States, and then for Victim-1 and her young child to take a flight from California to Queens, New York. After Victim-1 arrived in New York, BONIFACIO FLORES-MENDEZ took her to a house on 112th Street in Queens, New York (the "Degante Residence"), where she was made to sleep on the floor under the kitchen table with her young child. In exchange for these accommodations, the matriarch of the Degante Residence, who Victim-1 knew as ISAIAS FLORES-MENDEZ's former mother-in-law, told Victim-1 that Victim-1 would be required to pay \$200 per month in rent, and \$50 per week for food.

c. BONIFACIO FLORES-MENDEZ was in New York with Victim-1 at the time, awaiting the arrival from Mexico of ISAIAS FLORES-MENDEZ. BONIFACIO FLORES-MENDEZ attempted to recruit Victim-1 to work as a prostitute, and provided Victim-1 with a notebook containing contact information for brothels and drivers.

² Victim-1 has provided reliable information that has been independently corroborated. Victim-1 may obtain immigration relief, pursuant to the Trafficking Victims Protection Reauthorization Act, as a result of her victimization and her cooperation with the Government.

BONIFACIO FLORES-MENDEZ took Victim-1 to a brothel in Yonkers, New York.

d. Once ISAIAS FLORES-MENDEZ arrived in New York, he and BONIFACIO FLORES-MENDEZ worked together to use threats, verbal abuse, and violence to force Victim-1 to engage in commercial sex against her will in the New York City area and in Yonkers. On one occasion, when Victim-1 refused to work as a prostitute, ISAIAS FLORES-MENDEZ pushed Victim-1 and her young child outside into the cold winter night, locked the door, and refused to let her back in. Later that night, when BONIFACIO FLORES-MENDEZ returned home and let Victim-1 and her young child back inside, ISAIAS FLORES-MENDEZ said, in sum and substance, that Victim-1 needed to learn what would happen if she disobeyed him.

e. Utilizing brothels located in Manhattan, Bronx, Yonkers, and Brooklyn, ISAIAS FLORES-MENDEZ directly caused Victim-1 to perform commercial sex against her will daily, often servicing more than 20 customers per day. ISAIAS FLORES-MENDEZ also sent Victim-1 to engage in commercial sex against her will in Maryland, Connecticut, New Jersey, and Pennsylvania.

f. Based on Victim-1's observations, both ISAIAS FLORES-MENDEZ and BONIFACIO FLORES-MENDEZ each had several women working for them, or being forced to work for them, as prostitutes.

g. JUANA LUCAS-SANCHEZ, the defendant, worked for BONIFACIO FLORES-MENDEZ as a prostitute and served as an "enforcer" for ISAIAS FLORES-MENDEZ and BONIFACIO FLORES-MENDEZ with respect to Victim-1.

h. For example, LUCAS-SANCHEZ went shopping for revealing clothes to be worn by Victim-1. LUCAS-SANCHEZ also directed Victim-1 to work as a prostitute, and dictated which sexual acts Victim-1 should perform. LUCAS-SANCHEZ also directed Victim-1 to continue to engage in prostitution while menstruating.

i. At one point, suspicion arose that Victim-1 had become pregnant. In response, ISAIAS FLORES-MENDEZ, BONIFACIO FLORES-MENDEZ, and LUCAS-SANCHEZ took Victim-1 to a doctor, and forced her to take several pills that were described to her as Cytotec, which she understood were intended to induce a

miscarriage if she were pregnant.

j. ISAIAS FLORES-MENDEZ took the money earned by Victim-1. When Victim-1 did not provide ISAIAS FLORES-MENDEZ with all of her earnings in a given day, he beat her.

k. ISAIAS FLORES-MENDEZ, BONIFACIO FLORES-MENDEZ, and LUCAS-SANCHEZ used cell phones to perpetrate this crime by communicating with each other and Victim-1 during the commission of the crime, by using cell phones to contact the drivers and brothel workers to find out how many customers Victim-1 had serviced in a given day so that ISAIAS FLORES-MENDEZ could collect all of the earnings and ensure that Victim-1 was not holding back any money, and by providing Victim-1 with at least one cell phone that Victim-1 was then required to use to arrange with drivers or brothel workers to engage in commercial sex.

57. Based on my review of airline records, I know that in or about September 2006, Victim-1 and her young child flew from California to Queens, New York.

SEX TRAFFICKING OF VICTIM-2

58. In 2012 and 2013, I interviewed Victim-2,³ who, as set forth below, gave an account of her experience being forced to engage in prostitution as a result of force, threats of force, and coercion by an individual known to her as "David Vasquez-Medina." Victim-2 was shown a known photograph of DAVID VASQUEZ-MEDINA, the defendant, and identified the person depicted in that photograph as the "David Vasquez-Medina" who caused Victim-2 to engage in prostitution against her will. Victim-2 also identified known photographs of ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," and BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendants.

59. Based on my interviews of Victim-2, I know the following:

³ Victim-2 has provided reliable information that has been independently corroborated. Victim-2 may obtain immigration relief, pursuant to the Trafficking Victims Protection Reauthorization Act, as a result of her victimization and her cooperation with the Government.

a. In or about 2006, while living in the United States, Victim-2 met DAVID VASQUEZ-MEDINA, the defendant, and began a romantic relationship with him. A few months later Victim-2 returned to Mexico with her child. Shortly thereafter, VASQUEZ-MEDINA also returned to Mexico, where he met Victim-2's parents and announced his intention to marry her.

b. In or about later 2006, VASQUEZ-MEDINA and Victim-2's brother were smuggled back into United States. VASQUEZ-MEDINA then made arrangements for Victim-2 and her child to be smuggled into the United States.

c. When Victim-2 first joined VASQUEZ-MEDINA, both Victim-2 and VASQUEZ-MEDINA had legitimate work. After VASQUEZ-MEDINA lost his legitimate job, however, VASQUEZ-MEDINA began working as a driver, delivering women working, or being forced to work, as prostitutes, to farms in New Jersey where the women had sex with the farm workers.

d. VASQUEZ-MEDINA told Victim-2 that she should work as a prostitute and that the women he drove made 200 dollars or more a day. Victim-2 told VASQUEZ-MEDINA that she did not wish to do such work.

e. Thereafter, Victim-2 lost her legitimate job, and her brother, who had been working in another state, came to live with Victim-2 and VASQUEZ-MEDINA. VASQUEZ-MEDINA became angry and verbally abusive towards Victim-2 because neither Victim-2 nor her brother were working and because Victim-2's child cost a lot of money.

f. After suffering verbal abuse concerning Victim-2's failure to make money, and the expense of her child, and repeated pressure from VASQUEZ-MEDINA, Victim-2 agreed to work as a prostitute. VASQUEZ-MEDINA purchased provocative clothing for Victim-2.

g. VASQUEZ-MEDINA drove Victim-2 to various farms in New Jersey where Victim-2 had sex with approximately 25 clients per day. VASQUEZ-MEDINA charged the clients \$30 for 15 minutes of sex with Victim-2. VASQUEZ-MEDINA kept all of the money Victim-2 had been paid.

h. On another occasion, VASQUEZ-MEDINA made arrangements for Victim-2 to work out-of-state for a week.

During that week, Victim-2 had sex with approximately 70 to 80 clients. At the end of the week Victim-2 was given approximately \$1,000. Victim-2 then returned to VASQUEZ-MEDINA by traveling through Manhattan, at which time VASQUEZ-MEDINA told Victim-2 that he had spoken to the individual for whom Victim-2 had worked and knew how much she had earned. VASQUEZ-MEDINA forced Victim-2 to give him all of the money she had been paid.

i. After approximately two more weeks of working as a prostitute, Victim-2 pleaded with VASQUEZ-MEDINA to permit her to stop working as a prostitute. Victim-2 offered to work two jobs in order to earn more money. In response, VASQUEZ-MEDINA punched Victim-2, and told her, in sum and substance, that she had choice and must continue to work as a prostitute. VASQUEZ-MEDINA threatened to tell Victim-2's family that she was working as a prostitute, and that she would be responsible for her mother, who had a weak heart, dying from the shock. VASQUEZ-MEDINA also said that if Victim-2 did not comply he would take her child and she would never see her child again.

j. Victim-2 was afraid of VASQUEZ-MEDINA and therefore did as he instructed. For approximately two years after this exchange, Victim-2 worked in prostitution against her will and under the control of VASQUEZ-MEDINA. Initially, VASQUEZ-MEDINA would set up work for Victim-2, but as time went on, he required Victim-2 to find her own work.

k. In or around 2008, VASQUEZ-MEDINA was arrested and deported to Mexico. Once VASQUEZ-MEDINA was deported, Victim-2 stopped working as a prostitute. She began selling flowers and living in the Degante Residence.

l. While living in the Degante Residence, Victim-2 observed that the Degante-Galeno family, including, but not limited to ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante Galeno," a/k/a "El Zorro," MARIA BAUTISTA-PENA, a/k/a "Maricruz," MIGUEL ANGEL CHE-VELIZ, a/k/a "Miguelon," and ISIDRO DEGANTE-GALENO, a/k/a "Marcos," a/k/a "El Perro," a/k/a "Cachorro," MARGARITO DEGANTE, a/k/a "Chachalaco," the defendants, were also engaged in the prostitution business. Victim-2 observed discussions between various members of the Degante-Galeno family concerning their work in prostitution, discuss women being forced to work as prostitutes, and meet in the Degante Residence to discuss the division of prostitution money among family members. Victim-2 learned that members of the Degante-Galeno family were

working with ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," and BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendants.

m. In approximately 2010, VASQUEZ-MEDINA began calling Victim-2 from Mexico. VASQUEZ-MEDINA told Victim-2 that he had changed and wanted to be with her and that he wanted to return to the United States. After he returned to the United States, however, Victim-2 learned that while in Mexico, VASQUEZ-MEDINA had begun a romantic relationship with Victim-2's sister, and that VASQUEZ-MEDINA was forcing Victim-2's sister, who had also come to the United States, to work in prostitution.

INTERSTATE TRANSPORTATION FOR PURPOSE OF PROSTITUTION

60. Based on my review of summaries of calls intercepted pursuant to the April 2013 Order, and of reports of surveillance written by other law enforcement officers, I know the following. I know the following:

a. On or about April 14, 2013, at approximately 10:54 a.m., BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota" received a call on Intercepted Cellphone-1 from a woman identified in this and other calls as "Karen" ("Karen"). During the call, Karen said that she was "calling about the week starting tomorrow," and asked where she could wait for BONIFACIO FLORES-MENDEZ. BONIFACIO FLORES-MENDEZ responded that they could meet on "111th and Roosevelt" at 8:30.

b. On or about April 15, 2013, at approximately 8:26 a.m., BONIFACIO FLORES-MENDEZ received a call on Intercepted Cellphone-1 from Karen. During the call, the following conversation, in substance and in part, took place:

KAREN: I'm on my way there, but there is too much traffic here and I have not been able to get to Manhattan.
BONIFACIO: All right then, meanwhile I pick up the rest.
KAREN: All right, I will call you when I get out of the Lincoln [U/I].
BONIFACIO: All right.

c. Based on my training and experience, and my familiarity with this investigation, I believe that Karen is a

woman working, or being forced to work as a prostitute and that in the above call Karen told BONIFACIO FLORES-MENDEZ that she there was a lot of traffic en route to Manhattan through the Lincoln Tunnel to New Jersey and that she would be late. I further believe that BONIFACIO FLORES-MENDEZ said he would first pick up the other women working, or being forced to work, as prostitutes.

d. Shortly thereafter, at approximately 8:51 a.m., BONIFACIO FLORES-MENDEZ again used Intercepted Cellphone-1 to speak to Karen. During the call, Karen said that she was "almost there," and BONIFACIO FLORES-MENDEZ confirmed that they were meeting on "111th." At approximately 9:12 a.m., BONIFACIO FLORES-MENDEZ and Karen again spoke on Intercepted Cellphone-1 and Karen said that she had arrived and BONIFACIO FLORES-MENDEZ responded that he would "pass by now."

e. At approximately 9:35 a.m., law enforcement agents observed a Black Honda registered to "Isaias Flores Mendez," parked at the intersection of 112th Street and Roosevelt Avenue, in Queens, New York. Just before the Black Honda drove away, law enforcement agents observed to unidentified Hispanic females in the back seat.

f. Based on my training and experience and my participation in this investigation, I believe that Karen is a woman working or being forced to work as a prostitute and that in the above calls, she and BONIFACIO FLORES-MENDEZ discussed the fact that she would travel from New Jersey to meet him in order to be transported to a brothel for a week of work. I further believe that on or about April 15, 2013, BONIFACIO FLORES-MENDEZ met Karen in the vicinity of 112th Street and Roosevelt Avenue, picked her up, and transported her, and at least one other woman, to work at a brothel.

g. On or about April 22, 2013, at approximately 10:10 a.m., BONIFACIO FLORES-MENDEZ received a call on Intercepted Cellphone-1 from a woman who identified herself during the call as "Violeta" ("VIOLETA"). During the call, the following conversation, in substance and in part, took place:

VIOLETA: . . . It's Violeta speaking.
BONIFACIO: Yes, call me on Sunday.
VIOLETA: Yes I am checking in and on Sunday I will call you.

BONIFACIO: Okay. Call me on Sunday to see where I pick you up. You are the one that lives in New Jersey, right?

VIOLETA: Yes, yes, I will call you on Sunday.

h. Based on my training and experience, and my familiarity with this investigation, I believe that Violeta is a woman working, or being forced to work as a prostitute, and that in the above call BONIFACIO FLORES-MENDEZ said that Violeta should call him on Sunday to confirm where he would pick her up to take her to work at a brothel, and confirmed that she lives in New Jersey.

THE PROSTITUTION-SEX TRAFFICKING ENTERPRISE

61. Since at least in or about 2008, ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," CARLOS GARCIA-DE LA ROSA, a/k/a "Choqui," a/k/a "Pirulo," a/k/a "Miguel," ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante-Galeno," a/k/a "El Zorro," MARIA BAUTISTA-PENA, a/k/a "Maricruz," ISIDRO DEGANTE-GALENO, a/k/a "Marcos," a/k/a "El Perro," a/k/a "Cachorro," MARGARITO DEGANTE, a/k/a "Chachalaco," VALENTIN JIAMEZ-DOLORES, FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," the defendants, and others known and unknown, have been working in a criminal business enterprise, which profits from the sale of human beings for sex.

62. Women who work, or are forced to work, as prostitutes for participants of the enterprise typically work under the abhorrent conditions described in more detail in paragraphs 13 through 23, above. The participants in this criminal business enterprise serve different functions, operating brothels, manning the brothels, driving victims to brothels and to customers' residences for the purpose of engaging in prostitution, dispatching drivers, passing out chica cards to advertise the enterprise, and recruiting and overseeing the women who work, or are forced to work, as prostitutes. In order to carry out their crimes, members of this criminal business enterprise rely heavily on the use of cell phones, communicating with each other, with victims and potential victims, and with customers by cell phone multiple times each day.

63. Based on my review of GPS tracking data obtained

pursuant to court-authorized warrants, the February 2013 Order, and the April 2013 Order, I know that on a daily basis, members of this conspiracy travel through Bronx, New York en route to the Yonkers Brothel, the Newburgh Brothel, and the Poughkeepsie Brothel.

ISAIAS FLORES-MENDEZ

64. On or October 16, 2012, law enforcement agents conducting surveillance observed an individual later identified as ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," the defendant, exit the Poughkeepsie Brothel and get into a vehicle and drive away. Later that day, law enforcement agents observed ISAIAS FLORES-MENDEZ in the vicinity of the Newburgh Brothel. Based on my review of GPS tracking data for Intercepted Cellphone-3, which ISAIAS FLORES-MENDEZ was using on or about October 16, 2012, I know that he traveled from Queens, New York to Poughkeepsie, New York, and from Newburgh, New York back to Queens, New York by traveling through Bronx, New York.

65. Based on my review of summaries of consensually recorded telephone communications made by ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," the defendant, while incarcerated⁴ at the Vernon C. Bain Center at Rikers Island ("Rikers Island")⁵, I know the following:

a. On or about October 22, 2012, at approximately 9:36 a.m., ISAIAS FLORES-MENDEZ placed a call to Intercepted Cellphone-1 and spoke to BONIFACIO FLORES-MENDEZ,

⁴ ISAIAS FLORES-MENDEZ was incarcerated at Rikers Island from the time of his October 19, 2012, arrest until January 2, 2013, when he was transferred into federal custody in this District on the basis of a complaint charging him with illegal reentry in violation of Title 8, United States Code, Section 1326(a) (12 Mag. 3262). On or about January 14, 2013, ISAIAS FLORES-MENDEZ was indicted on the same charge (13 Cr. 31 (KBF)).

⁵ Based on my conversations with other law enforcement agents and my review of documents concerning Rikers Island inmate phone policies, I know that a sign is posted near all phones, in both English and Spanish, which informs inmates that, "Inmate telephone conversations are subject to electronic monitoring and/or recording in accordance with Department policy."

a/k/a "Boni," a/k/a "Mota," the defendant. During the call, ISAIAS FLORES-MENDEZ and BONIFACIO FLORES-MENDEZ discussed the fact that BONIFACIO FLORES-MENDEZ had located a tracking device on a 1998 red Ford Expedition bearing Maryland license plate number 40484M7 (the "Red Expedition"), which is registered to "Bonifacio Flores-Mendez" (the "red one"), and that he had removed the tracking device. BONIFACIO FLORES-MENDEZ further said that the problem was that he "already [has] the women with [him]," and that he was going to drop them off far away. ISAIAS FLORES-MENDEZ directed BONIFACIO FLORES-MENDEZ to leave the women at the Family Dollar store. BONIFACIO FLORES-MENDEZ said he would use an individual he referred to as "Chachalaco," who I believe to be MARGARITO DEGANTE, a/k/a "Chachalaco," the defendant, to go up there (meaning, to the Family Dollar store to get the women and take them to the brothel).

b. On or about October 30, 2012, at approximately 7:36 p.m., ISAIAS FLORES-MENDEZ placed a call to Intercepted Cellphone-1 and spoke to BONIFACIO FLORES-MENDEZ. During the call, ISAIAS FLORES-MENDEZ and BONIFACIO FLORES-MENDEZ engaged in the following discussion, in substance and in part:

ISAIAS: Did you get women reported for Monday?
BONIFACIO: Yes, Chola, for Brooklyn she said.
ISAIAS: Ah-ha.
BONIFACIO: And another one who says that she had a fight in Poughkeepsie, she also reported herself for outside.
ISAIAS: Oh, for outside? Yes, yes, yes, I know who she is.
BONIFACIO: Ah-ha. And another one. . . there was even one too many . . . then the . . . dark skinned Angelica for . . . Yonkers.

c. Based on my training and experience, and my participation in this investigation, I believe that in the above conversation, ISAIAS and BONIFACIO FLORES-MENDEZ discussed which women would work at which brothels and that BONIFACIO FLORES-MENDEZ said that "Chola" would work at the Queens Brothel,⁶

⁶Based on my review of this and other calls that reference a Brooklyn brothel, and my review of reports documenting surveillance, I know that the brothel referred to in this and other calls as being in Brooklyn is, in fact, the Queens Brothel

"Angelica" would work at the Yonkers Brothel, and that another woman, who previously had a fight at the Poughkeepsie Brothel, would work elsewhere, possibly through a delivery service ("outside").

d. On or about November 8, 2012, at approximately 9:39 a.m., ISAIAS FLORES-MENDEZ placed a call to Intercepted Cellphone-1 and spoke to BONIFACIO FLORES-MENDEZ. During the call, ISAIAS FLORES-MENDEZ told BONIFACIO FLORES-MENDEZ in substance and in part, that:

ISAIAS: I found a tall guy . . . his last name is Mendoza, at the church . . . I [asked] "why did they put you in here?" . . . he said, "domestic violence." [I asked] "so where are you from, guy?" Then he told me "Tenancingo," . . . "From there come the pimps, guy," I said. He starts laughing. "And how do you know that, guy?" [he asked]. I said, "because I work on that too, guy" . . . oh, then he started telling me . . . "I wooed a young girl who . . . was fifteen [and] . . . later on, like six months after that I put her to work, guy . . . and then they catch her over there in . . . Florida" . . . I told him, "no kidding."

e. Based on my training and experience and my participation in this investigation, I believe that in the above conversation, ISAIAS FLORES-MENDEZ told BONIFACIO FLORES-MENDEZ about a conversation ISAIAS FLORES-MENDEZ had with another inmate at Rikers Island. In that conversation, ISAIAS FLORES-MENDEZ said that he was aware that "pimps" come from Tenancingo, Mexico because ISAIAS FLORES-MENDEZ works in the business of "pimping" - that is, works facilitating, causing, and/or compelling women to engage in prostitution for his financial gain.

f. On or about November 13, 2012, at approximately 9:47 p.m., ISAIAS FLORES-MENDEZ placed a call to an individual identified in other calls as "Angelica." During the conversation, ISAIAS FLORES-MENDEZ and Angelica discussed the fact that she was filling out various forms in anticipation of

(which is very close to the Brooklyn-Queens border).

the birth of her and ISAIAS FLORES-MENDEZ's child. During that conversation, ISAIAS FLORES-MENDEZ and Angelica had the following exchange:

ANGELICA: And they don't ask anything - no name or anything?
ISAIAS: Well, of course. So give mine. Isaias Flores-Mendez.
ANGELICA: Should I give yours?
ISAIAS: Yeah. Isaias Flores-Mendez. Don't give another name . . . yeah, because I have everything with that name, my passport and all . . . and in any case, I'll have time to arrive, for the birth certificate, I can sign it and all.
ANGELICA: Oh, all right.
ISAIAS: . . .Yeah, you can say the num . . . his father's number, give that one. 686 4929.
ANGELICA: Uh huh.
ISAIAS: I'm also going to change my 686 number . . . and I'll start calling the women with that one . . . because the 686 . . . one is also really burnt . . . but that would be when I arrive . . . and open other places and start working really hard for my son.

g. Based on my training and experience, and my participation in this and other investigations, I believe that in the above call ISAIAS FLORES-MENDEZ told Angelica to list his phone number as Intercepted Cellphone-1 and told her that after he returned to the United States (following his likely deportation when the then pending state criminal charges were resolved) he intended to get a new phone with which to speak with women working, or being forced to work, as prostitutes ("I'll start calling the women with that one") because Intercepted Cellphone-1 ("the 686 one") was "burnt," meaning that law enforcement authorities had become aware of his use of that number. ISAIAS FLORES-MENDEZ further stated that he intended to open additional brothels ("open other places") upon his illegal reentry from Mexico in order to support his son.

BONIFACIO FLORES-MENDEZ

66. Based on my review of summaries of calls intercepted pursuant to the April 2013 Order, I know the

following:

a. On or about April 14, 2013, at approximately 12:21 p.m., BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, received a call on Intercepted Cellphone-1 from a woman who identified herself on the call as "Elizabeth" ("Elizabeth"). During the call, the following conversation, in substance and in part, took place:

ELIZABETH: I am calling to check in, I am with you next week in Brooklyn.
BONIFACIO: Okay, call me on Sunday then.
ELIZABETH: Listen, did you check for the 29th, to Newburgh . . . you told me you were going to check last night.
BONIFACIO: No right now I am up here in Newburgh . . . Call me tonight and we will check.

b. Based on my training and experience, and my familiarity with this investigation, I believe that Elizabeth is a woman working, or being forced to work, as a prostitute for BONIFACIO FLORES-MENDEZ and his co-conspirators. In this call, she asked BONIFACIO FLORES-MENDEZ for a week of work beginning on April 29, 2013, at the Newburgh Brothel.

c. On or about April 15, 2013, at approximately 1:34 p.m., BONIFACIO FLORES-MENDEZ received a call on Intercepted Cellphone-3 from an unidentified male ("UM-8311"). During the call, the following conversation, in substance and in part, took place:

UM-8311: How are the girls now?
BONIFACIO: Good.
UM-8311: Better than last week?
BONIFACIO: A lot better.
UM-8311: Where are they from?
BONIFACIO: Dominican and Mexican.

d. Based on my training and experience, and my familiarity with this investigation, I believe that UM-8311 is a customer of a brothel run by BONIFACIO FLORES-MENDEZ. In this call, UM-8311 asked about the women working, or being forced to work, as prostitutes in the brothel, and BONIFACIO FLORES-MENDEZ provided their countries of origin and said they were a lot better than the women who had been working in the brothel last

week (alluding to the fact that the women work in the brothel in one-week shifts).

e. On or about April 23, 2013, at approximately 9:17 p.m., BONIFACIO FLORES-MENDEZ placed a call on Intercepted Cellphone-1 to a woman who identified herself during the call as "Alejandra," ("Alejandra"). During the call, the following conversation, in substance and in part, took place:

BONIFACIO: Did you call me?
ALEJANDRA: Yeah, I call you yesterday. My name is Alejandra.
BONIFACIO: For when?
ALEJANDRA: I don't know. Whenever you . . . well, whatever week is available sometime soon.
BONIFACIO: For where do you want?
ALEJANDRO: Ummm . . . one to stay and one for round trip.
BONIFACIO: Okay for May . . . hold on . . . April I already have . . . Hmmm . . . the closest one that I have is May 6th and May 13th to stay.
ALEJANDRA: Okay well put me down for the 13th to stay.
BONIFACIO: . . . Okay, for Yonkers Round trip . . . you want for . . . May 20th . . . [to self:] ' Mayra, Diana, 27th, Wendy, Joanna, Dulce.' Hmmm . . . the 10th of June?
ALEJANDRA: No, for the 10th of June I already have that one . . . do you have for the 24th? What about the first of July?
BONIFACIO: Yes, the 1st yes.
ALEJANDRA: Put me down for that one round trip . . . because they told me that you have 3 . . . I don't know if . . .
BONIFACIO: I have 4.
ALEJANDRA: Oh, you have 4?
BONIFACIO: Yeah, I have 2 to stay upstairs and I have 2 round trip, one for Brooklyn and one for Yonkers . . . okay so I have you for May 13th to stay over . . . May 20th for Brooklyn and . . . let's see . . . which one did you tell me? The 1st of July, right?
ALEJANDRA: Uh huh. For Yonkers. But the two that are to stay over are for the same location or

in different places?
BONIFACIO: No they are different. They are like 40 minutes from each other.
ALEJANDRA: Oh, in Newburgh . . .
BONIFACIO: One is in Newburgh and the other one is in Poughkeepsie.

f. Based on my training and experience, and my familiarity with this investigation, I believe that Alejandra is a woman working, or being forced to work, as a prostitute, and that in the above call she was making arrangements to work for a week at a time at various brothels run by BONIFACIO FLORES-MENDEZ. In this call, BONIFACIO FLORES-MENDEZ describes the fact that he has four brothels, two at which the women working stay for the entire week, including sleeping at the brothel ("2 to stay") and two at which the women arrive each morning of the designated week and return home each evening of that week ("two round trip").

67. Based on my training and experience, my participation in this investigation, and the following facts, I believe that Intercepted Cellphone-1 is used by BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant:

a. Based on my conversations with Victim-2, I know that (i) ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," the defendant, used Intercepted Cellphone-1 (ii) BONIFACIO FLORES-MENDEZ and ISAIAS FLORES-MENDEZ are brothers; and (iii) BONIFACIO FLORES-MENDEZ uses the nickname "Mota."

b. Based on my review of wire remitter records from Casa De Cambio and Western Union, I know that both BONIFACIO FLORES-MENDEZ and ISAIAS FLORES-MENDEZ listed Intercepted Cellphone-1 as their phone number when sending wire transfers to Mexico.

c. Based on my review of consensually recorded and intercepted calls over Intercepted Cellphone-1, I know that (i) Intercepted Cellphone-1 has continued to be in use since ISAIAS FLORES-MENDEZ's arrest in October 2012; (ii) the individual using Intercepted Cellphone-1 is referred to in calls as "Mota;" (iii) ISAIAS FLORES-MENDEZ has placed numerous calls to Cellphone-1 during which ISAIAS FLORES-MENDEZ has discussed the user of Intercepted Cellphone-1, the health of their mother

and the business of prostitution, among other topics.

CARLOS GARCIA-DE LA ROSA

68. Based on my review of summaries of calls intercepted pursuant to the February 2013 Order, I know the following:

a. On or about February 23, 2013, at approximately 11:04 a.m., CARLOS GARCIA-DE LA ROSA, a/k/a "Choqui," a/k/a "Pirulo," a/k/a "Miguel," the defendant, using Intercepted Cellphone-2, received an incoming call from an unknown male ("UM-1203"). During the intercepted call, the following conversation, in part, took place:

UM-1203: Do you have something?
DE LA ROSA: Yes.
UM-1203: But where because I went to the other one, the one with the red door, and there was no one there.
DE LA ROSA: No, I moved. I'm close by. Do you know where Pancho Villa is?
UM-1203: Yeah.
DE LA ROSA: Go over there and I'll pick you up.
UM-1203: Oh.
DE LA ROSA: Just tell me what you are wearing and I'll pick you up.
UM-1203: No, listen, I'll call you during the week. I just want to know where it is.
DE LA ROSA: Do you know where Rose Place is? Next to the gas station. It's house number [number provided].
UM-1203: Oh, house number [number provided]?
DE LA ROSA: Yes, two bells on the right. It's on the second floor.
UM-1203: So, I ring bell number 2?
DE LA ROSA: Yes, both of the bells are working for upstairs or call me and I'll come down and pick you up.
UM-1203: Cool.

b. Based on my training and experience, and my familiarity with this investigation, I believe that GARCIA-DE LA ROSA is a runner who works for BONIFACIO FLORES-MENDEZ and his co-conspirators. In his role as a runner, GARCIA-DE LA ROSA

transports women working, or being forced to work, as prostitutes to and from the brothels operated by BONIFACIO FLORES-MENDEZ, or to outside clients, and also transports customers to and from these brothels. Here, a prospective customer is speaking to GARCIA-DE LA ROSA about the location of the brothel in Poughkeepsie. GARCIA-DE LA ROSA offers to drive the customer to the brothel ("just tell me what you are wearing and I'll pick you up"), but the customer says he is simply trying to learn the location ("no, listen, I'll call you during the week. I just want to know where it is."). GARCIA-DE LA ROSA then identifies the location of the brothel in Poughkeepsie ("do you know where Rose Place is? Next to the gas station. It's house number [number provided]"). The address provided by GARCIA-DE LA ROSA on Rose Place is the address of the Poughkeepsie Brothel.

c. On or about February 23, 2013, at approximately 10:10 p.m., BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, using Intercepted Cellphone-2, received an incoming call from GARCIA-DE LA ROSA. During the intercepted call, the following conversation, in part, took place:

DE LA ROSA: Don't take any money from there. I'll give you the envelope tomorrow. I have you today's envelope and tomorrow you give it to me.

BONIFACIO: Cool.

DE LA ROSA: Yeah, because if not [U/I]. I didn't see when she called you.

BONIFACIO: She said, "hey, tell Choqui to call me." Fucking flaca told her that my girl left already.

DE LA ROSA: No, I said, "I'm leaving, aunt." I didn't bother you anymore. I said, "maybe this guy doesn't want to." I'm going to pass by and give you the receipt.

d. Based on my training and experience, and my familiarity with this investigation, I believe that GARCIA-DE LA ROSA and BONIFACIO FLORES-MENDEZ are discussing the distribution of illegal prostitution/trafficking proceeds from the brothels operated by the criminal business enterprise. In this call, GARCIA-DE LA ROSA tells BONIFACIO FLORES-MENDEZ not to "take any money from there," which I believe is a reference to the

brothels.

e. On or about February 26, 2013, at approximately 8:46 a.m., BONIFACIO FLORES-MENDEZ, using Intercepted Cellphone-1, placed an outgoing call to a woman identified during other calls to the same number as "Mayra" ("Mayra"). During the intercepted call, the following conversation, in part, took place:

MAYRA: Hello.
BONIFACIO: Choqui says he's at the corner on 108 and 32.
MAYRA: Okay.

f. Based on my training and experience, and my familiarity with this investigation, I believe that Mayra is working, or being forced to work, as a prostitute for BONIFACIO FLORES-MENDEZ and his co-conspirators. During this call, BONIFACIO FLORES-MENDEZ instructs Mayra to go to a corner where GARCIA-DE LA ROSA is waiting to drive Mayra to a brothel.

g. On or about March 5, 2013, at approximately 3:51 p.m., GARCIA-DE LA ROSA, using Intercepted Cellphone-2, received an incoming call from an unknown male ("UM-7794"). During the intercepted call, the following conversation, in part, took place:

UM-7794: The girls of Poughkeepsie.
DE LA ROSA: Yes, come.
UM-7794: From where?
DE LA ROSA: Mexico.
UM-7794: I'll be there later.
DE LA ROSA: Okay, when you get here just knock.
UM-7794: Okay.

h. Based on my training and experience, and my familiarity with this investigation, I believe that in this call, a prospective customer is speaking to GARCIA-DE LA ROSA about the women working, or being forced to work, as prostitutes at the Poughkeepsie Brothel. The customer wants to know where the women are from, and GARCIA-DE LA ROSA responds that they are from Mexico. The customer said he would arrive to the brothel later, and GARCIA-DE LA ROSA told the customer to knock when he arrives.

i. On or about March 5, 2013, the following

calls were intercepted on Intercepted Cellphone-2:

i) At approximately 3:55 p.m., GARCIA-DE LA ROSA, using Intercepted Cellphone-2, received an incoming call from BONIFACIO FLORES-MENDEZ. During the intercepted call, the following conversation, in part, took place:

DE LA ROSA: Tell me chipotles.
BONIFACIO: You have one downstairs.
DE LA ROSA: Okay, okay.

ii) Approximately twenty-five minutes later, GARCIA-DE LA ROSA, using Intercepted Cellphone-2, received another call from BONIFACIO FLORES-MENDEZ, during which the following conversation, in part, took place:

DE LA ROSA: Tell me, chipotles.
BONIFACIO: You have one downstairs chiptudo.
DE LA ROSA: Okay, okay.

iii) A few hours later, at approximately 7:06 p.m., GARCIA-DE LA ROSA, using Intercepted Cellphone-2, received an incoming call from BONIFACIO FLORES-MENDEZ. During the intercepted call, the following conversation, in part, took place:

DE LA ROSA: Chipotles.
BONIFACIO: The guy is downstairs.
DE LA ROSA: He is already inside dumbass.
BONIFACIO: Okay, okay.

iv) Based on my training and experience, and my familiarity with this investigation, I believe that in each of these calls, BONIFACIO FLORES-MENDEZ is alerting GARCIA-DE LA ROSA to calls BONIFACIO FLORES-MENDEZ has received from customers, indicating that there are customers coming to the brothel (e.g., "you have one downstairs"), and that GARCIA-DE LA ROSA, in his capacity as doorman or steerer, should let them inside.

69. Based on my training and experience, my participation in this investigation, and the following facts, I believe that Intercepted Cellphone-2 was used by CARLOS GARCIA-DE LA ROSA, a/k/a "Choqui," a/k/a "Pirulo," a/k/a "Miguel," the defendant:

a. As described in further detail above, on or about March 8, 2013, GARCIA-DE LA ROSA was administratively arrested. At the time of his arrest, GARCIA-DE LA ROSA was in possession of Intercepted Cellphone-2. GARCIA-DE LA ROSA admitted that Intercepted Cellphone-2 was his phone.

ALEJANDRO DEGANTE-GALENO

70. Based on my review of summaries of calls intercepted pursuant to the February 2013 Order and the April 2013 Order, I know the following:

a. On or about February 26, 2013, at approximately 1:36 p.m., ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante Galeno," a/k/a "El Zorro," the defendant, using Intercepted Cellphone-5, placed an outgoing call to an unidentified female ("UF-3569"). During the intercepted call, the following conversation, in part, took place:

UF-3569: Hello.
ALEJANDRO: This motherfucker didn't go in. He wanted to do it without a condom. Tell him no next time. Negro gave me one right now 89 and 35th. I'm going to do that one and then I'm going to head up for yours, okay.
UF-3569: Cool.
ALEJANDRO: Keep him there. Keep him there. Tell him that the girl is 17 years old.
UF-3569: Okay.

b. Based on my training and experience, and my familiarity with this investigation, I believe that, during this call, ALEJANDRO DEGANTE-GALENO was driving a car that dropping off and picking up women working, or being forced to work, as prostitutes from addresses of customers. In this call, UF-3569 was acting as a dispatcher, was directing ALEJANDRO DEGANTE-GALENO to various pick-up and drop-off locations. ALEJANDRO DEGANTE-GALENO references a particular woman who refused to engage in commercial sex with a customer because the customer was unwilling to wear a condom. ALEJANDRO DEGANTE-GALENO told UF-3569 to keep a particular customer interested by telling him that the woman working, or being forced to work, as a prostitute who was to be delivered to the customer is only 17 years old.

c. On or about April 15, 2013, at approximately 12:36 p.m., ALEJANDRO DEGANTE-GALENO received a call on Intercepted Cellphone-5 from ISIDRO DEGANTE-GALENO, a/k/a "Marcos," a/k/a "El Perro," a/k/a "Cachorro". During the call, the following conversation, in substance and in part, took place:

ISIDRO: He said the door is open to go up to the second floor he'll open for her.
ALEJANDRO: Okay, 2nd Floor.
ISIDRO: Uh huh.
ALEJANDRO: It's [street number] 32nd right?

d. Based on my training and experience, and my familiarity with this investigation, I believe that in this call, ISIDRO DEGANTE-GALENO was serving as a dispatcher for ALEJANDRO DEGANTE-GALENO, and was relaying information from a customer about customers' location.

e. On or about April 15, 2013, at approximately 9:29 p.m., ALEJANDRO DEGANTE-GALENO received an incoming call on Intercepted Cellphone-5 from an individual identified on other calls as both "Sergio" and "Huesito" ("Huesito"). During the call, the following conversation, in substance and in part, took place:

HUESITO: Where are you?
ALEJANDRO: I will be there real soon.
HUESITO: Okay.
ALEJANDRO: There's nothing?
HUESITO: No, the four that we had are already covered.
ALEJANDRO: Okay.
HUESITO: Yeah, I already made you the favor for the day ones.
ALEJANDRO: Take the day and the night too.
HUESITO: Yes, I stayed with her the weekend night time too . . . I thought I was going to be able to do okay with Chachalaco's but I have to give some time to Monica as well . . . yeah, I called her [Monica] because I didn't have anyone else.
ALEJANDRO: Oh.
HUESITO: I had Monica because I didn't have anyone else. But today I got that girl that was with Chachalaco.

ALEJANDRO: Yeah.
HUESITO: I almost didn't get her . . .
ALEJANDRO: Now until 4 am, right?
HUESITO: Yeah, even if its early or late we'll still fuck around . . . they prostitute day or night.
ALEJANDRO: Yeah.
HUESITO: At what time is that girl getting there?
ALEJANDRO: Today she came in the day time.
Tomorrow she comes in at three . . . yeah, I told you she came in today at eight in the morning. She finished around five.
HUESITO: Oh, so she got to the house already?
ALEJANDRO: Yeah.

f. Based on my training and experience, and my familiarity with this investigation, I believe that in this call, Huesito and ALEJANDRO DEGANTE-GALENO are discussing their procurement of women working, or being forced to work, as prostitutes, including one who works for "Chachalaco," which I believe refers to MARGARITO DEGANTE, a/k/a "Chachalaco," the defendant, and the fact that the women will work day or night:

g. On or about April 18, 2013, at approximately 5:08 p.m., ALEJANDRO DEGANTE-GALENO placed a call on Intercepted Cellphone-5 to an individual identified on other intercepted calls as "Juancho" ("Juancho"). During the call, the following conversation, in substance and in part, took place:

ALEJANDRO: They said that new girl is good.
JUANCHO: Oh she's new.
ALEJANDRO: Yes, Nano said it's a girl.
JUANCHO: Oh, she's new?
ALEJANDRO: Yes.
JUANCHO: How old you think she is?
ALEJANDRO: She's only 17 and they're fucking her already.
JUANCHO: No kidding, she's young . . . she looks good?
ALEJANDRO: Huesito, Chachalaco and Mario already had her.
JUANCHO: Damn! All of them!
ALEJANDRO: Yes.
JUANCHO: They're lucky.

ALEJANDRO: It shows that she does it good. They said that she does it good.
JUANCHO: . . . Do you think she wants anything with you?
ALEJANDRO: I want to but the young guys got her already.
JUANCHO: There's nothing boss.

h. Based on my training and experience, and my familiarity with this investigation, I believe that in this call, ALEJANDRO DEGANTE-GALENO and Juancho are discussing a new female working, or being forced to work, as a prostitute, who was only 17 years old ("Minor Victim-2"). ALEJANDRO DEGANTE-GALENO indicated that MARGARITO DEGANTE, a/k/a "Chachalaco," and men identified as Huesito and Mario, had each had Minor Victim-2 work as a prostitute for them already (or, alternatively, that they had each already had sex with Minor Victim-2) and that ALEJANDRO DEGANTE-GALENO would like to have Minor Victim-2 work for (or, alternatively, have sex with) him.

71. Based on my training and experience, my participation in this investigation, and the following facts, I believe that Intercepted Cellphone-5 is used by ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante Galeno," a/k/a "El Zorro," the defendant:

a. Based on my review of subscriber information for Intercepted Cellphone-5, I know that Intercepted Cellphone-5 is subscribed in the name "Alejandro Mendoza."

b. Based on my review of Western Union records, I know that in connection with wire transfers to Mexico, ALEJANDRO DEGANTE-GALENO listed Intercepted Cellphone-5 as his phone number on multiple wire transfers.

c. Based on my interview of Victim-2, I know that ALEJANDRO DEGANTE-GALENO uses Intercepted Cellphone-5.

MARIA BAUTISTA-PENA

72. Based on my review of summaries of calls intercepted pursuant to the April 2013 Order, I know the following:

a. On or about April 20, 2013, at approximately

2:49 p.m., ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante Galeno," a/k/a "El Zorro," the defendant, placed a call from Intercepted Cellphone-5 to MARIA BAUTISTA-PENA, a/k/a "Maricruz," who was using a cell phone with a call number ending in 3569 "Cellphone-3569"). During the call, the following conversation, in substance and in part, took place:

ALEJANDRO: How many calls do you have? Tell me the ones you have done.
BAUTISTA-PENA: Give me time . . . Look [street address] 37th passed one . . . Okay, [street address] on 45th . . . [street address] on 37th . . . there are three.
ALEJANDRO: What? There are three, right? . . . three that are yours?
BAUTISTA-PENA: Yes, plus this one that is [street address] 101th. There will be four.
ALEJANDRO: Four of yours and one from Barbas that I did now.
BAUTISTA-PENA: Five.
ALEJANDRO: Five, right?
BAUTISTA-PENA: Uh huh.

b. Based on my training and experience, and my familiarity with this investigation, I believe that ALEJANDRO DEGANTE-GALENO delivers women working, or being forced to work, as prostitutes to customers' residences and that BAUTISTA-PENA works as a dispatcher, receiving calls from customers and relaying orders to ALEJANDRO DEGANTE-GALENO. In this call, BAUTISTA-PENA said that she had taken four orders for women from customers, and that another individual identified as "Barbas" had taken one.

c. On or about April 21, 2013, at approximately 3:52 p.m., ALEJANDRO DEGANTE-GALENO received a call on Intercepted Cellphone-5 from BAUTISTA-PENA, using Cellphone-3569. During the call, the following conversation, in substance and in part, took place:

BAUTISTA-PENA: He said he's at the door and no one is there.
ALEJANDRO: Okay wait. Come over here. . . There are some guys here. Tell him that she's at the door.

BAUTISTA-PENA: He's outside. I'll ask what he's wearing.
ALEJANDRO: Don't hang up. Wait. I think she went in. I'm going to do it for 40.
BAUTISTA-PENA: Okay, Bye.

d. Based on my training and experience, and my familiarity with this investigation, I believe that in this call, BAUTISTA-PENA said a customer - who was waiting for the delivery of a woman working, or being forced to work, as a prostitute - said that he was at the door and no one was there. ALEJANDRO DEGANTE-GALENO said the woman had gone in (to the customer's residence) and that he was going to charge the customer \$40 for the commercial sex.

e. On or about April 22, 2013, at approximately 5:25 p.m., ALEJANDRO DEGANTE-GALENO placed a call on Intercepted Cellphone-5 to BAUTISTA-PENA, using a cell phone with a call number ending in 2740 ("Cellphone-2740"). During the call, the following conversation, in substance and in part, took place:

ALEJANDRO: The girls is inside but the guy is not opening the door.
BAUTISTA-PENA: The [] guy is calling, he says that he is there.
ALEJANDRO: But what the hell! What do you do? What do you do? She is there. It is [street address].
BAUTISTA-PENA: 71! 71! I told you.
ALEJANDRO: Oh, 71, 71 okay, okay.

f. Based on my training and experience, and my familiarity with this investigation, I believe that in the above call ALEJANDRO DEGANTE-GALENO said that the woman working, or being forced to work as a prostitute, who ALEJANDRO DEGANTE-GALENO was delivering to a customer's residence was inside the customer's building but the customer was not answering the door. BAUTISTA-PENA, working as a dispatcher, was on the phone with the customer at the same time, and told ALEJANDRO DEGANTE-GALENO that the customer was at the door. When it became clear that ALEJANDRO DEGANTE-GALENO had gone to the wrong address, BAUTISTA-PENA directed him to the correct address.

73. Based on my training and experience, my participation in this investigation, and the following facts, I

believe that Cellphone-3569 and Cellphone-2740 are used by MARIA BAUTISTA-PENA, a/k/a "Maricruz," the defendant:

a. Based on my review of subscriber information for the Cellphone-3569, I know that it is subscribed to "Maria Bautista" at the Degante Residence.

b. Based on my conversations with Victim-2, I learned that (i) ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante Galeno," a/k/a "El Zorro," the defendant, and his significant other, "Maria Bautista," live at the Degante Residence; (ii) that Celestino Degante uses the phone number of Intercepted Cellphone-5; and that "Maria Bautista" answers phones for the prostitution business.

c. Based on the content of the numerous intercepted calls between Intercepted Cellphone-5 and the Cellphone-3569, I believe that (i) the user of Cellphone-3569 goes by the name "Maricruz," (ii) the user of Intercepted CELLPHONE-5 and Cellphone-3569 are in a relationship and (iii) that the user of Cellphone-3569 works as a dispatcher for a prostitution delivery service.

d. Based on a comparison of the voice of the individual using Cellphone-3569 and the voice of the individual using the Cellphone-2740, I believe that both phones are being used by the same person.

ISIDRO DEGANTE-GALENO

74. Based on my interviews of Victim-2, I know that ISIDRO DEGANTE-GALENO, a/k/a "Marcos," a/k/a "El Perro," the defendant, has worked, at various times, as a driver, delivering women who work, or are forced to work, as prostitutes to brothels and/or to the residences of customers.

75. Based on my interviews of a woman ("Victim-3")⁷ who was trafficked by an individual not named herein, I know that ISIDRO DEGANTE-GALENO a/k/a "Marcos," a/k/a "El Perro," the defendant, has worked, at various times, as a driver, delivering

⁷ Victim-3 has provided reliable information that has been independently corroborated. Victim-3 may obtain immigration relief, pursuant to the Trafficking Victims Protection Reauthorization Act, as a result of her victimization and her cooperation with the Government.

women to the residences of customers for the purposes of prostitution. ISIDRO DEGANTE-GALENO was one of the drivers who transported Victim-3 to customers for the purpose of engaging in prostitution. ISIDRO DEGANTE-GALENO is also known as "Marcos" and "El Perro."

76. Based on my review of summaries of calls intercepted pursuant to the February 2013 Order and the April 2013 Order, I know the following:

a. On or about February 22, 2013, at approximately 10:06 p.m., ISIDRO DEGANTE-GALENO, a/k/a "Marcos," a/k/a "El Perro," the defendant, using Intercepted Cellphone-4, received an incoming call from an unidentified male ("UM-1922"). During the intercepted call, the following conversation, in part, took place:

UM-1922: What girls do you have?
ISIDRO: From Salvador and Mexico.
UM-1922: How do they look?
ISIDRO: They both look good.
UM-1922: Can you bring me - how much do you charge?
ISIDRO: 35.
UM-1922: For how long?
ISIDRO: 10-15 minutes.
UM-1922: And half an hour?
ISIDRO: 70.
UM-1922: What's the least?
ISIDRO: 70.
UM-1922: Can you do it for 60?
ISIDRO: No, that's what they charge you. 35 for [u/i].
UM-1922: Can you bring one to Astoria? To [street address] 30th Road?
ISIDRO: Give me 20 minutes.

b. Based on my training and experience, and my familiarity with this investigation, I believe that UM-1922 is a potential customer of ISIDRO DEGANTE-GALENO, who is working as a driver conducting deliveries of women working, or being forced to work, as prostitutes. The customer inquires about the availability of prostitutes, and ISIDRO DEGANTE-GALENO responds that he has women available who are El Salvadorean and Mexican. The customer then asks about pricing. ISIDRO DEGANTE-GALENO explains that the price is \$35 for 10-15 minutes of sex, or \$70

for a 30 minutes. Although the customer tries to negotiate a lower price, ISIDRO DEGANTE-GALENO says that it is not possible. The customer then asks for a woman to be delivered to a specific address, and ISIDRO DEGANTE-GALENO agrees.

c. On or about March 10, 2013, at approximately 10:06 p.m., ISIDRO DEGANTE-GALENO, a/k/a "Marcos," a/k/a "El Perro," using Intercepted Cellphone-4, had a telephone conversation, direction unknown, with an unidentified male ("UM"), using an unidentified/unregistered cell phone. During the intercepted call, the following conversation, in part, took place:

UM: Hey friend, are you working?
ISIDRO: Yes.
UM: What do you have?
ISIDRO: Salvador and Mexico.
UM: Which is better?
ISIDRO: They're both good.
UM: Okay, bring one.
ISIDRO: To where?
UM: [Street address] 39th Avenue on Roosevelt.
ISIDRO: Okay, give me 15 minutes.

d. Based on my training and experience, and my familiarity with this investigation, I believe that the UM is a customer who is asking ISIDRO DEGANTE-GALENO about the availability of women working, or being forced to work, as prostitutes ("What do you have . . . which is better"). The customer then asked ISIDRO DEGANTE-GALENO to deliver a woman to a specific address in Queens for sex ("bring one"), and ISIDRO DEGANTE-GALENO responded that he would have the woman at that address in "15 minutes."

77. Based on my training and experience, my participation in this investigation, and the following facts, I believe that Intercepted Cellphone-4 is used by ISIDRO DEGANTE-GALENO, a/k/a "Marcos," a/k/a "El Perro," the defendant:

a. Based on my review of subscriber records for Intercepted Cellphone-4, I know that it is subscribed in the name "Marcos Degante."

b. Based on my conversations with Victim-2, I know that ISIDRO DEGANTE-GALENO uses Intercepted Cellphone-4 and

that ISIDRO DEGANTE-GALENO uses the nickname "Marcos," among others.

c. Based on my conversations with a third victim, Victim-3, I know that Victim-3 called ISIDRO DEGANTE-GALENO on Intercepted Cellphone-4 to arrange for ISIDRO DEGANTE-GALENO to drive Victim-3 to brothels and/or to the residences of customers.

MARGARITO DEGANTE

78. Based on my review of summaries of calls intercepted pursuant to the February 2013 Order, I know the following:

a. On or about February 26, 2013, the following conversations were intercepted on Intercepted Cellphone-5:

i) At approximately 5:04 p.m., ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante Galeno," a/k/a "El Zorro," the defendant, using Intercepted Cellphone-5, received an incoming call from an unidentified female working, or being forced to work, as a prostitute ("UF-4240") and MARGARITO DEGANTE, a/k/a "Chachalaco," the defendant, using a cell phone with a call number ending in 4240 ("Cellphone-4240"), during which the following conversation took place, in sum and substance:

MARGARITO: Call him. [Street address] hasn't come out yet.
ALEJANDRO: 29
MARGARITO: Oh, it's 29?
ALEJANDRO: Yes. Hold on. I have him on the line. Hello.
UF-4240: He said to come to the door. He's there already.
ALEJANDRO: Okay. I have him on the other line. Chalaco? Chalaco?
MARGARITO: Yes.
ALEJANDRO: Hey. She said that he's at the door. Number 29. Send her.
MARGARITO: Okay, [street address].
ALEJANDRO: Yes, I'll wait for you at [street name]. I'm going to leave.
MARGARITO: Okay, I saw him already.

ii) Based on my training and experience, and my familiarity with this investigation, I believe that ALEJANDRO DEGANTE-GALENO, UF-4240, and MARGARITO DEGANTE are discussing the delivery of a woman working, or being forced to work, as a prostitute to a customer for the purpose of engaging in commercial sex. In this call, while driving UF-4240 to a customer, MARGARITO DEGANTE is updating ALEJANDRO DEGANTE-GALENO about the customer's whereabouts, noting to ALEJANDRO DEGANTE-GALENO that the customer is not yet in sight ("hasn't come out yet"). ALEJANDRO DEGANTE-GALENO gives MARGARITO the correct address, which MARGARITO acknowledges, and then proceeds with the transaction ("Okay, I saw him already.").

iii) A few minutes later, at approximately 5:08 p.m., MARGARITO DEGANTE, using Cellphone-4240, placed a call to ALEJANDRO DEGANTE-GALENO, using Intercepted Cellphone-5, during which the following conversation took place, in sum and substance:

MARGARITO: Where are you?
ALEJANDRO: Come right here to the other one. Come to .
. . what you call it? Come to seventy-first.
Right?
MARGARITO: A ha, yeah. On [street name].
ALEJANDRO: Yeah, is that where that bitch stays?
MARGARITO: Yes. She's stayed there. But they haven't
passed yet.
ALEJANDRO: Yeah, why don't you come down the next one,
dude?
MARGARITO: On seventy-second?
ALEJANDRO: 71, 72, yes, 73.
MARGARITO: Seventy-third and what?
ALEJANDRO: Seventy-third and [street name], dude.
MARGARITO: Alright. I just passed seventy-second.
ALEJANDRO: Okay.

iv) Based on my training and experience, and my familiarity with this investigation, I believe that ALEJANDRO DEGANTE-GALENO and MARGARITO DEGANTE are discussing meeting up in their cars on the street outside of a customer's address while they wait for a woman who is working, or being forced to work, as a prostitute to complete an appointment with a customer.

v) Almost two hours later, at approximately 6:54 p.m., MARGARITO DEGANTE, using Cellphone-4240, placed a call

to ALEJANDRO DEGANTE-GALENO, using Intercepted Cellphone-5, during which the following conversation took place, in sum and substance:

ALEJANDRO: Where are you? In the car?

MARGARITO: I'm here. I came out to the corner here to pass some cards out. I'm going over there dude.

vi) Based on my training and experience, and my familiarity with this investigation, I believe that in this call, MARGARITO DEGANTE indicates that he is on a corner passing out chica cards to advertise the prostitution enterprise.

79. Based on my training and experience, my participation in this investigation, and the following facts, I believe that Cellphone-4240 is used by MARGARITO DEGANTE, a/k/a "Chachalaco," the defendant:

a. Based on my conversations with Victim-2, I know that MARGARITO DEGANTE goes by the nickname Chachalaco.

b. Based on my review of intercepted calls, I know that the user of the 4240 Cellphone uses the nickname Chachalaco and that the user of the 4240 Cellphone uses the 4240 Cellphone to speak to members of the Degante-Galeno family, including ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante Galeno," a/k/a "El Zorro," the defendant.

VALENTIN JIAMEZ-DOLORES

80. On or about November 21, 2012, law enforcement agents conducting surveillance of the Yonkers Brothel observed an individual later identified as VALENTIN JIAMEZ-DOLORES, the defendant, exit the Yonkers Brothel and get into the Red Expedition. During a stop of that vehicle by law enforcement agents, JIAMEZ-DOLORES claimed that he did not have any identification documents on him, but proffered that his name was "Valentine Jaimes," and provided a date of birth and a street address.

81. As described above, on or about December 20, 2012, law enforcement agents interviewed VALENTIN JIAMEZ-DOLORES, the defendant, following his arrest at the Yonkers Brothel and execution of a written waiver of his Miranda rights. JIAMEZ-

DOLORES then stated, in substance and in part, that the Yonkers Brothel is, in fact, a brothel, and that JIAMEZ-DOLORES mans the door of the Yonkers Brothel and collects \$30 from each customer in return for a playing card, which the customers then gave to the women working in the brothel as payment for sex. Law enforcement agents seized from the person of JIAMEZ-DOLORES 17 playing cards, \$180 in cash, and a key ring. JIAMEZ-DOLORES was also in possession of an identification document which bore the name "Valentin Jiamez-Dolores" and the same date of birth and street address as that proffered by JIAMEZ-DOLORES on or about November 21, 2012.

82. Based on my review of summaries of calls intercepted pursuant to the February 2013 Order, I know the following:

a. On or about March 5, 2013, at approximately 6:45 p.m., BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, using Intercepted Cellphone-3, made an outgoing call to VALENTIN JIAMEZ-DOLORES, the defendant, using a cell phone with a call number ending in 4158 ("Cellphone-4158"). During the intercepted call, the following conversation, in substance and in part, took place:

BONIFACIO: There is a guy that is going to be there. If it is a customer he says I will lend him . . . that he will give me ten then tomorrow he will give the twenty. If you know him do it, if not no.

JIAMEZ-DOLORES: Okay.

BONIFACIO: He is going there now.

b. Based on my training and experience, and my familiarity with this investigation, I believe that BONIFACIO FLORES-MENDEZ was telling JIAMEZ-DOLORES that a customer was going to come to JIAMEZ-DOLORES and tell him that BONIFACIO FLORES-MENDEZ said it would be okay for him to patronize a woman working as a prostitute that evening and pay the next day ("a customer he says I will lend him . . . that he will give me ten and then tomorrow he will give the twenty"). BONIFACIO FLORES-MENDEZ told JIAMEZ-DOLORES that if he recognized this customer to allow it ("If you know him do it"), but that if JIAMEZ-DOLORES did not recognize the customer to not let him have sex with a woman without paying in full first ("if not no").

83. Based on my training and experience, my participation in this investigation, and the following facts, I believe that Cellphone-4158 is used by VALENTIN JIAMEZ-DOLORES, the defendant:

a. As described in further detail above, on or about November 18, 2012, law enforcement officers conducted a traffic stop of the Red Expedition. In addition to BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, law enforcement encountered an individual who claimed to be without identification but said his name was "Valentine Jaimes," and provided a date of birth and address. The same individual was later arrested and admitted that he was working at the Yonkers Brothel. At the time of his arrest, the individual was in possession of an identification document bearing the name "Valentin Jiamez-Dolores," which bore the same date of birth and address as "Valentine Jaimes" had provided to law enforcement.

b. Based on my review of Western Union and Casa De Cambio records I know that an individual named "Valentin Jiamez-Dolores" has sent wire transfers to Mexico in connection with which he listed the cell phone number for Cellphone-4158.

c. Based on my review of intercepted calls with Cellphone-4158, I know that during some intercepted calls the user of Cellphone-4158 is referred to as "Valentin."

FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda,"
a/k/a "Barbas," a/k/a "Barbitas"

84. Based on my review of reports prepared other law enforcement agents, I know the following:

a. On several occasions in November and December 2012, and in April 2013, FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," the defendant, was seen escorting men into the Queens Brothel. Each man was seen leaving the Queens Brothel after spending approximately 10-15 minutes inside. While conducting surveillance, law enforcement agents took video of FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," from which photographs were printed, some of which are attached hereto as Exhibit A.

b. On or about December 6, 2012, agents conducting surveillance of the Queens Brothel saw an individual later identified as FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," entering and exiting the Queens Brothel. That day, HSI agents encountered a man who had left the Queens Brothel ("Customer-1"), who said, in sum and substance, that FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," operated the Queens Brothel.

c. On or about December 6, 2012, agents conducting surveillance followed FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," from the Queens Brothel to Latin Travel on Seneca Avenue, which provides a money remitter service.

85. Based on my review of records provided by the money remitter service operated out of Latin Travel on Seneca Avenue, I know the following:

a. On or about December 4, 2012, a wire transfer in the amount of approximately \$500 was sent to "Alicia Miranda-Flores" in Puebla, Mexico from an individual who identified himself as "Alberto Jesus Martinez-Miranda," living at the address of the Queens Brothel, with a contact phone number ending in 0431 ("Cellphone-0431").

b. On or about December 6, 2012, a wire transfer in the amount of approximately \$200 was sent to "Luis Ramon Martinez-Miranda" in Puebla, Mexico from an individual who identified himself as "Alberto Jesus Martinez-Miranda," living at the address of the Queens Brothel, with Cellphone-0431 listed as the contact number.

86. Based on my review of an ICE database, I know that on or about February 15, 1999, an individual identified as "Alberto Martinez-Miranda" was encountered along the United States-Mexico border, and stated that his mother's name is "Alicia."

87. Based on my review of summaries of calls intercepted pursuant to the April 2013 Order, I know the following:

a. On or about April 8, 2013, at approximately 4:54 p.m., BONIFACIO FLORES-MENDEZ, a/k/a "Boní," a/k/a "Mota,"

the defendant, placed a call from Intercepted Cellphone-3 to FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," the defendant, who was using Cellphone-0431. During the call, the following conversation, in substance and in part, took place:

FNU LNU: Tell me, tell me.
BONIFACIO: Check a guy for me with a black shirt and [U/I] Eight. Seneca and Grow.
FNU LNU: Okay, Okay.

b. Based on my training and experience, and my familiarity with this investigation, I believe that in the above call BONIFACIO told FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," to check on a male, possibly a client, who was near the Queens Brothel.

c. On or about April 18, 2013, at approximately 7:59 p.m., BONIFACIO FLORES-MENDEZ placed a call on Intercepted Cellphone-3 to FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," using Cellphone-0431. During the call, the following conversation, in substance and in part, took place:

BONIFACIO: You have one downstairs.
FNU LNU: Alright.
BONIFACIO: Tell the girl that 3 guys are going to be waiting in five minutes. It's 3 separate ones.
FNU LNU: Alright.

d. Based on my training and experience, and my familiarity with this investigation, I believe that in the above call, BONIFACIO FLORES-MENDEZ told FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," to tell the woman working, or being forced to work as a prostitute, that three separate customers were on their way and would arrive in 5 minutes.

88. Based on my training and experience, my participation in this investigation, and the following facts, I believe that Cellphone-0431 is being used by FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," the defendant: (i) law enforcement agents' observation of FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda,"

a/k/a "Barbas," a/k/a "Barbitas," working at the Queens Brothel, (ii) the intercepted calls concerning the Queens Brothel, and (iii) the use by FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," of Cellphone-0431 to send wire transfers to an individual with the same name as that of his mother.

OBSTRUCTION OF JUSTICE

89. Based on my review of records from the Virginia Department of Motor Vehicles and the Maryland Motor Vehicle Administration, I know the following:

a. A 1999 black Honda Accord with Virginia license plate WXM 7063 (the "Black Honda") is registered to "Isaias Flores-Mendez."

b. The Red Expedition (described above) is registered to "Bonifacio Flores-Mendez."

c. A 2001 white Chevy Astro Van bearing Maryland license plate number 3AK2211 (the "Chevy Astro") is registered to "Bonifacio Flores-Mendez."

90. On or about October 18, 2012, pursuant to a court-authorized tracking warrant, GPS tracking devices were placed on the Red Expedition and on the Chevy Astro. The GPS tracking device placed on the Chevy Astro, however, was defective and never successfully transmitted GPS data. On or about October 22, 2012, the GPS tracking device on the Red Expedition failed - that is, the GPS tracking device which had previously been transmitting GPS data, ceased to do so. Based on my experience working with GPS tracking devices, I know that a tracking device may "fail" for many reasons, including that the device itself may be defective, that the device may be inadvertently dislodged from the vehicle to which it is magnetically attached, or it may be intentionally removed. On or about October 23, 2012, replacement GPS devices were placed on the Red Expedition and the Chevy Astro. On or about October 25, 2012, the GPS tracking device on the Red Expedition failed again. On or about November 14, 2012, a replacement GPS tracking device was placed on the Red Expedition. On or about November 15, 2012, the GPS tracking device on the Chevy Astro failed. On or about November 19, 2012, the GPS tracking device on the Red Expedition failed again. Shortly thereafter, law enforcement agents approached the Red

Expedition and the Chevy Astro to look for the GPS tracking devices but were unable to locate them.

91. Based on my review of consensually recorded telephone communications made by ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," the defendant, while incarcerated at Rikers Island, I know the following:

a. On or about October 22, 2012, at approximately 9:36 a.m., ISAIAS FLORES-MENDEZ placed a call to Intercepted Cellphone-1 and spoke to an individual later identified as BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant. During the call, BONIFACIO FLORES-MENDEZ stated, in substance and in part, "listen carefully . . . I found a tracker in the red one . . . I put gas in it a while ago and it started spilling so I went to Miguelon's . . . [and] he said,] 'listen dude, you have something weird on the fuel tank . . . so we took it out . . . it's a tracking device dude . . . but the problem is that I already have the women with me . . . I am going to drop them off far away."

b. On or about October 25, 2012, at approximately 6:36 p.m., ISAIAS FLORES-MENDEZ again placed a call to Intercepted Cellphone-1 and again spoke to BONIFACIO FLORES-MENDEZ. During the call, BONIFACIO FLORES-MENDEZ stated in substance and in part, "I found another tracking device in the red one . . . last night Choqui went to get it and Miguelon said, 'we have to check it out every two or three days,' . . . so I called him and told him 'let's check it out . . . ' . . . we removed the spare tire and now they placed it on top of the spare tire. . . he [Miguelon] said 'take it apart . . . take half of it, I'll dispose of half of it, and you leave . . . and go throw the other half in the ocean.' I pulled over by Whitestone and dropped it there."

c. On or about October 31, 2012, at approximately 7:39 p.m., ISAIAS FLORES-MENDEZ placed another call to Intercepted Cellphone-1 and again spoke to BONIFACIO FLORES-MENDEZ. During the call, ISAIAS FLORES-MENDEZ asked, in substance and in part, if everything was fine in Yonkers and whether BONIFACIO FLORES-MENDEZ, had "seen anything else weird?" BONIFACIO FLORES-MENDEZ replied, in substance and in part, that everything was fine and that he had not seen anything weird. ISAIAS FLORES-MENDEZ then asked, in substance and in part, if

"you guys not check the black car or anything," and BONIFACIO FLORES-MENDEZ responded "yes, but it doesn't have anything. That's the one I am driving now." ISAIAS FLORES-MENDEZ inquired further, "did you guys open up the engine and everything," and BONIFACIO FLORES-MENDEZ said yes.

92. Based on my review of telephone calls intercepted pursuant to the April 2013 Order, I know the following:

a. On or about February 23, 2013, at approximately 10:40 a.m., BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," the defendant, received an incoming call on Intercepted Cellphone-3 from a man identified during the call as "Miguelon," who was using a cellular telephone assigned a call number ending in 0765 ("CELLPHONE-0765"), during which the following conversation took place, in substance and in part:

BONIFACIO: Tell me, Miguelon.
MIGUELON: The black one is ready.
BONIFACIO: Okay. I will pass by in a little while.

b. Based on my training and experience, and my familiarity with this investigation, I believe that BONIFACIO FLORES-MENDEZ and "Miguelon" were discussing the Black Honda that BONIFACIO FLORES-MENDEZ and his co-conspirators use to transport women who work, and are forced to work, as prostitutes, and I believe that "Miguelon" is a mechanic.

93. Based on my review of subscriber records for CELLPHONE-0765, I know that CELLPHONE-0765 is subscribed in the name "Miguel Ang Che."

94. Based on my review of a Customs and Border Patrol database, I know that on or about February 2, 2013, an airline ticket for a child (the "Child Passenger") was booked with CELLPHONE-0765 listed as the contact telephone number for the Child Passenger).

95. Based on my review of United States Department of State records, I know that United States Passport issued for the Child Passenger states that the Child Passenger's father is "Miguel Angel Che Veliz," with an address on 53rd Avenue in Queens, New York, and a contact phone number that is the same as CELLPHONE-0765.

96. Based on my review of GPS tracking data obtained pursuant to a court-authorized warrant, I know that CELLPHONE-0765 is frequently in the vicinity of the address on 53rd Avenue in Queens, New York, that was provided for "Miguel Angel Che Veliz" in the Passport for the Child Passenger.

97. Based on my training and experience, and my familiarity with this investigation, and my review of the records, phone calls, and data described above, I believe that the "Miguelon" referred to by BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," in calls with ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," is the same person as MIGUEL ANGEL CHE-VELIZ, a/k/a "Miguelon," the defendant. I further believe that as discussed in the intercepted calls described above, MIGUEL ANGEL CHE-VELIZ located the tracking devices that law enforcement had placed on the Red Expedition and the Chevy Astro and destroyed and/or directed that the tracking devices be destroyed. I further believe that MIGUEL ANGEL CHE-VELIZ then continued to check various cars used by BONIFACIO FLORES-MENDEZ and others for new tracking devices and removed any additional tracking devices that he found.

POSSESSION OF CHILD PORNOGRAPHY

98. Based on my review of summaries of calls intercepted pursuant to the February 2013 Order, I know the following:

a. On or about February 22, 2013, at approximately 10:31 p.m., CARLOS GARCIA-DE LA ROSA, a/k/a "Choqui," a/k/a "Pirulo," a/k/a "Miguel," spoke to Minor Victim-1 on Intercepted Cellphone-2. During the call, the following conversation, in substance and in part, took place:

DE LA ROSA: What are you doing? Send me a picture
[pause] of you, naked.
MINOR VICTIM-1: Ah?
DE LA ROSA: Send me a picture of you, naked.
MINOR VICTIM-1: I will take a shower.
DE LA ROSA: Are you going to take a shower?
MINOR VICTIM-1: Yes.
DE LA ROSA: Send me a picture, no?
MINOR VICTIM-1: I will think about it.
DE LA ROSA: Please?

MINOR VICTIM-1: Okay then.
DE LA ROSA: Of you taking a shower, very open.
MINOR VICTIM-1: Uh?
DE LA ROSA: When you are in the bathroom, standing,
very open . . . I'll never ask you
anything else. Only that . . . send it
to me this number, uh?
MINOR VICTIM-1: Okay then.

99. On or about March 8, 2013, CARLOS GARCIA-DE LA ROSA, a/k/a "Choqui," a/k/a "Pirulo," a/k/a "Miguel," the defendant, was administratively arrested by the Department of Homeland Security, waived his Miranda rights, and was interviewed. During the interview, GARCIA-DE LA ROSA stated, in substance and in part:

- a. He had been talking to Minor Victim-1 for approximately 6-7 months.
- b. He knows Minor Victim-1 to be approximately 14 years old.
- c. He asked Minor Victim-1 to send him naked photos of herself, including photos of her breasts and photos of Minor Victim-1 with her legs spread open. Minor Victim-1 texted GARCIA-DE LA ROSA the requested photos. Shortly after receiving the requested photos he deleted them from his phone.

100. Law enforcement agents recovered Intercepted Cellphone-2 from CARLOS GARCIA-DE LA ROSA, a/k/a "Choqui," a/k/a "Pirulo," a/k/a "Miguel," determined that it was manufactured outside of New York, and conducted a forensic review of Intercepted Cellphone-2. During the forensic review, law enforcement agents were able to recover previously deleted photos, one of which depicted a girls breasts and one of which depicted a girls genitalia (the "Photographs").

101. On or about March 11, 2013, Minor Victim-1 was interviewed by law enforcement. Minor Victim-1 stated, in substance and in part, that approximately two weeks prior, she had, at the request of a man with whom she had a sexual relationship, taken pictures of herself and texted them to him. Minor Victim-1 was shown the Photographs and identified one of the images as the picture she took of her genitalia.

102. Based on my review of GPS tracking data for Intercepted Cellphone-2, I know that after February 22, 2013, and prior to his arrest, CARLOS GARCIA-DE LA ROSA, a/k/a "Choqui," a/k/a "Pirulo," a/k/a "Miguel," was present in the Southern District of New York.

103. Based on (i) the intercepted call described above; (ii) the statements of CARLOS GARCIA-DE LA ROSA, a/k/a "Choqui," a/k/a "Pirulo" a/k/a "Miguel," and Minor Victim-1, and the recovered Photographs, I believe that Minor Victim-1 is a minor and that she texted photographs depicting her genitalia to GARCIA-DE LA ROSA, who possessed the images on his cellular telephone, Intercepted Cellphone-2, in the Southern District of New York.

ILLEGAL REENTRY BY PANFILO FLORES-MENDEZ

104. Based on my review of the file maintained by ICE (the "Alien File") regarding PANFILO FLORES-MENDEZ, the defendant, I have learned the following:

a. PANFILO FLORES-MENDEZ is a citizen of Mexico and has never been a citizen of the United States.

b. On or about November 29, 2010, PANFILO FLORES-MENDEZ was removed and deported from the United States to Mexico. On that date, a photograph of PANFILO FLORES-MENDEZ was taken and added to his Alien File.

c. Following his removal and deportation to Mexico, PANFILO FLORES-MENDEZ never obtained the express consent of the Attorney General of the United States, or the Secretary for the Department of Homeland Security, to reapply for admission to the United States.

105. Based on my review of a report prepared by another HSI agent, I know the following:

a. On or about November 18, 2012, a Detective with the Yonkers Police Department (the "Yonkers Detective") saw PANFILO FLORES-MENDEZ, the defendant, walk out of the Yonkers Brothel and get into the Red Expedition. Shortly thereafter, the Yonkers Detective stopped the Red Expedition, which was occupied by PANFILO FLORES-MENDEZ, BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," VALENTIN JIAMEZ-DOLORES, and two women. PANFILO

FLORES-MENDEZ produced a Mexican identification document bearing the name "Panfilo Flores-Mendez" and a date of birth.

b. The Yonkers Detective looked at the photograph in the Alien File for PANFILO FLORES-MENDEZ and confirmed that it depicted the same person as the PANFILO FLORES-MENDEZ stopped in Yonkers, New York, on or about November 18, 2012.

106. Based on my review of the Alien File and the report documenting the car stop of by the Yonkers Detective on or about November 18, 2012, I know that the date of birth for PANFILO FLORES-MENDEZ that is in the Alien File, and the date of birth on the identification produced by PANFILO FLORES-MENDEZ on or about November 18, 2012, are the same.

ILLEGAL REENTRY BY JUANA LUCAS-SANCHEZ

107. Based on my review of the Alien File regarding JUANA LUCAS-SANCHEZ, the defendant, I have learned the following:

a. LUCAS-SANCHEZ is a citizen of Mexico and has never been a citizen of the United States.

b. On or about January 29, 2004, LUCAS-SANCHEZ was removed and deported from the United States to Mexico. On that date, LUCAS-SANCHEZ was fingerprinted and her fingerprint was placed on an executed warrant of removal. On that date, a photograph of LUCAS-SANCHEZ was taken and added to her Alien File.

c. On or about June 8, 2004, LUCAS-SANCHEZ was removed and deported from the United States to Mexico. On that date, LUCAS-SANCHEZ was fingerprinted and her fingerprint was placed on an executed notice to alien ordered removed/departure verification. On that date, a photograph of LUCAS-SANCHEZ was taken and added to her Alien File.

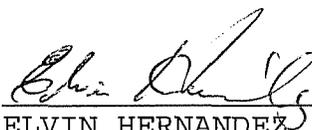
d. Following her removal and deportation to Mexico, LUCAS-SANCHEZ never obtained the express consent of the Attorney General of the United States, or the Secretary for the Department of Homeland Security, to reapply for admission to the United States.

108. On or about May 29, 2009, JUANA LUCAS-SANCHEZ, the

defendant, was arrested by the NYPD in Bronx, New York. On or about August 31, 2009, LUCAS-SANCHEZ was convicted upon of a plea of guilty, in Bronx County Supreme Court, to Prostitution, a class B misdemeanor, in violation of New York Penal Code Section 230.00, and sentenced to conditional discharge.

109. Upon her arrest on or about May 29, 2009, JUANA LUCAS-SANCHEZ's fingerprints were uploaded to a law enforcement database. The law enforcement database matched the fingerprints taken from LUCAS-SANCHEZ in connection with the May 29, 2009 arrest to the fingerprints taken by ICE in connection with LUCAS-SANCHEZ's removal on or about January 29, 2004, and on or about June 8, 2004.

WHEREFORE, deponent respectfully requests that warrants issue for the arrests of ISAIAS FLORES-MENDEZ, a/k/a "Adrian Sanchez Mendez," a/k/a "Jesus Diaz-Rincon," a/k/a "Chelo," BONIFACIO FLORES-MENDEZ, a/k/a "Boni," a/k/a "Mota," JUANA LUCAS-SANCHEZ, DAVID VASQUEZ-MEDINA, CARLOS GARCIA-DE LA ROSA, a/k/a "Choqui," a/k/a "Pirulo," a/k/a "Miguel," ALEJANDRO DEGANTE-GALENO, a/k/a "Celestino Degante Galeno," a/k/a "El Zorro," MARIA BAUTISTA-PENA, a/k/a "Maricruz," MIGUEL ANGEL CHE-VELIZ, a/k/a "Miguelon," ISIDRO DEGANTE-GALENO, a/k/a "Marcos," a/k/a "El Perro," a/k/a "Cachorro," MARGARITO DEGANTE, a/k/a "Chachalaco," PANFILO FLORES-MENDEZ, VALENTIN JIAMEZ-DOLORES, and FNU LNU, a/k/a "Alberto Jesus Martinez-Miranda," a/k/a "Barbas," a/k/a "Barbitas," the defendants, and that they each be arrested and imprisoned, or bailed, as the case may be.



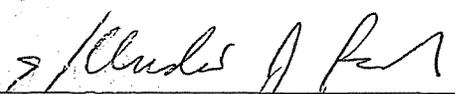
ELVIN HERNANDEZ

SPECIAL AGENT

DEPARTMENT OF HOMELAND SECURITY

APR 29 2013

Sworn to before me this
27th day of April 2013



THE HONORABLE ANDREW J. PECK
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK

EXHIBIT A

