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FILED

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CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____
DEPUTY CLERK

6 Attorneys for Plaintiff
7 United States of America

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JEREMY RAY WARREN, and
ALYSSA TEGAN BRULEZ,
15 Defendants.
16

CASE NO. **2:15 - CR - 0189 TLN**

VIOLATIONS: 18 U.S.C. § 1591(a)(1) and (c) – Sex Trafficking of a Child or by Force, Threats of Force, or Coercion (three counts); 18 U.S.C. § 1594(c) – Conspiracy to Engage in Sex Trafficking of a Child; 18 U.S.C. §1594(d) – Criminal Forfeiture

17
18 INDICTMENT

19 COUNT ONE: [18 U.S.C. § 1591(a)(1) – Sex Trafficking of a Child or by Force, Threats of Force, or
20 Coercion]

21 The Grand Jury charges: T H A T

22 JEREMY RAY WARREN,

23 defendant herein, between on or about February 18, 2013, and on or about April 18, 2013, in the State
24 and Eastern District of California, and elsewhere, did knowingly, in and affecting interstate commerce,
25 and after having a reasonable opportunity to observe Victim 1, entice, harbor, transport, provide, obtain,
26 and maintain Victim 1 by any means, knowing, and in reckless disregard of the fact, that:

27 (1) means of force, threats of force, and coercion, and any combination of such means, would be
28 used to cause Victim 1 to engage in at least one commercial sex act; and

1 (2) Victim 1 had not attained the age of 18 years and would be caused to engage in at least one
2 commercial sex act.

3 In violation of Title 18, United States Code, Section 1591(a)(1) and (c).

4 COUNT TWO: [18 U.S.C. § 1594(c) – Conspiracy to Engage in Sex Trafficking of a Child]

5
6 The Grand Jury charges: T H A T

7 JEREMY RAY WARREN, and
8 ALYSSA TEGAN BRULEZ,

9 defendants herein, between on or about April 23, 2013, and continuing through on or about April 25,
10 2013, in the State and Eastern District of California, did conspire and agree with each other to
11 knowingly, in and affecting interstate commerce, and after having a reasonable opportunity to observe
12 Victim 2, do the following:

13 (1) harbor, transport, provide, and maintain Victim 2 by any means; and

14 (2) benefit, financially and by receiving anything of value, from participating in a venture which
15 harbored, transported, provided, and maintained Victim 2 by any means;

16 knowing, and in reckless disregard of the fact, that:

17 (1) means of force, threats of force, and coercion, and any combination of such means, would be
18 used to cause Victim 2 to engage in at least one commercial sex act; and

19 (2) Victim 2 had not attained the age of 18 years and would be caused to engage in at least one
20 commercial sex act.

21 In violation of Title 18, United States Code, Sections 1594(c) and 1591(a)(1) and (c).

22 COUNT THREE: [18 U.S.C. §§ 1591(a)(1) – Sex Trafficking of a Child or by Force, Threats of Force,
23 or Coercion]

24 The Grand Jury charges: T H A T

25 ALYSSA TEGAN BRULEZ,

26 defendant herein, between on or about April 23, 2013, and on or about April 25, 2013, in the State and
27 Eastern District of California, and elsewhere, did knowingly, in and affecting interstate commerce, and
28 after having a reasonable opportunity to observe Victim 2, recruit, entice, harbor, provide, obtain, and
maintain Victim 2 by any means, knowing, and in reckless disregard of the fact, that:

1 (1) means of force, threats of force, and coercion, and any combination of such means, would be
2 used to cause Victim 2 to engage in at least one commercial sex act; and

3 (2) Victim 2 had not attained the age of 18 years and would be caused to engage in at least one
4 commercial sex act.

5 In violation of Title 18, United States Code, Section 1591(a)(1) and (c).

6 COUNT FOUR: [18 U.S.C. § 1591(a)(1) – Sex Trafficking of a Child or by Force, Threats of Force, or
7 Coercion]

8 The Grand Jury charges: T H A T

9 JEREMY RAY WARREN,
10 defendant herein, between on or about February 1, 2012, and on or about January 26, 2013, in the State
11 and Eastern District of California, and elsewhere, did knowingly, in and affecting interstate commerce,
12 and after having a reasonable opportunity to observe Victim 3, recruit, entice, harbor, transport, provide,
13 obtain, and maintain Victim 3 by any means, knowing, and in reckless disregard of the fact, that:

14 (1) means of force, threats of force, and coercion, and any combination of such means, would be
15 used to cause Victim 3 to engage in at least one commercial sex act; and

16 (2) Victim 3 had not attained the age of 18 years and would be caused to engage in at least one
17 commercial sex act.

18 In violation of Title 18, United States Code, Section 1591(a)(1) and (c).

19 FORFEITURE ALLEGATION: [18 U.S.C. § 1594(d) – Criminal Forfeiture]

20 1. Upon conviction of any offense alleged in this Indictment, defendant JEREMY RAY
21 WARREN, and defendant ALYSSA TEGAN BRULEZ shall forfeit to the United States pursuant to 18
22 U.S.C. § 1594(d), any property, real or personal, that was used or intended to be used to commit or to
23 facilitate the commission of such violation, and any property, real or personal, constituting or derived
24 from, any proceeds that such person obtained, directly or indirectly, as a result of such violation.

25 2. If any property subject to forfeiture as a result of any offense alleged in this Indictment,
26 for which defendant is convicted:

- 27 a. cannot be located upon the exercise of due diligence;
28 b. has been transferred or sold to, or deposited with, a third party;

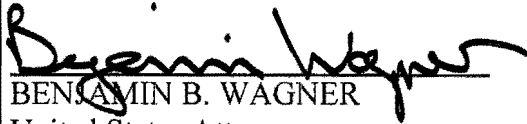
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant, up to the value of the property subject to forfeiture

A TRUE BILL.

/s/ Signature on file w/AUSA

FOREPERSON


BENJAMIN B. WAGNER
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

215 - CR - 0189 TLN

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JEREMY RAY WARREN, and
ALYSSA TEGAN BRULEZ

no process necessary

INDICTMENT

VIOLATION(S): 18 U.S.C. § 1591(a)(1) – Sex Trafficking of a Child or by Force, Threats of Force, or Coercion (Three Counts);
18 U.S.C. §1594(c) – Conspiracy to Engage in Sex Trafficking of a Child;
18 U.S.C. §1594(d) – Criminal Forfeiture

A true bill.

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this 10th day

of September, A.D. 20 15

[Signature]
Clerk.

Bail, \$ **NO PROCESS NECESSARY**

Card M. Delaney

United States v. Warren
Penalties for Indictment

Defendants

Jeremy Ray Warren
Alyssa Tegan Brulez

2:15 - CR - 0189 TLN

COUNT 1: **Warren**

VIOLATION: 18 U.S.C. § 1591(a)(1) – Sex Trafficking of Children or by Force, Threats of Force, or Coercion

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison – if convicted of sex trafficking of children ages of 14 and 17; Mandatory minimum of 15 years in prison and a maximum of up to life in prison – if convicted of sex trafficking by force, threats of force, or coercion; or
Fine of up to \$250,000; or both fine and imprisonment;
Supervised release of at least 5 years up to life.

SPECIAL ASSESSMENT: \$100

COUNT 2: **Warren and Brulez**

VIOLATION: 18 U.S.C. § 1594(c) – Conspiracy to Engage in Sex Trafficking of Children or by Force, Threats of Force, or Coercion

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison – if convicted of conspiring to engage in sex trafficking of children ages of 14 and 17; Mandatory minimum of 15 years in prison and a maximum of up to life in prison – if convicted of conspiring to engage in sex trafficking by force, threats of force, or coercion; or
Fine of up to \$250,000; or both fine and imprisonment;
Supervised release of at least 5 years up to life.

SPECIAL ASSESSMENT: \$100

COUNT 3: **Brulez**

VIOLATION: 18 U.S.C. § 1591(a)(1) – Sex Trafficking of Children or by Force, Threats of Force, or Coercion

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison – if convicted of sex trafficking of children ages of 14 and 17; Mandatory minimum of 15 years in prison and a maximum of up to life in prison – if convicted of sex trafficking by force, threats of force, or coercion; or
Fine of up to \$250,000; or both fine and imprisonment;
Supervised release of at least 5 years up to life.

SPECIAL ASSESSMENT: \$100

COUNT 4: **Warren**

VIOLATION: 18 U.S.C. § 1591(a)(1) – Sex Trafficking of Children or by Force, Threats of Force, or Coercion

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison – if convicted of sex trafficking of children ages of 14 and 17; Mandatory minimum of 15 years in prison and a maximum of up to life in prison – if convicted of sex trafficking by force, threats of force, or coercion; or
Fine of up to \$250,000; or both fine and imprisonment;
Supervised release of at least 5 years up to life.

SPECIAL ASSESSMENT: \$100

FORFEITURE ALLEGATION: **Both Defendants**

VIOLATION: 18 U.S.C. § 1594(d) – Criminal Forfeiture

PENALTIES: As stated in the charging document