## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA		*	CRIMINAL NO.: 13-286
<b>v.</b>		*	<b>SECTION: "R" (1)</b>
KANUBHAI PATEL,		*	
aka "Mr. Kenny" aka "Pop"		*	
	*	*	*

## FACTUAL BASIS

The Defendant, **KANUBHAI PATEL**, aka "Mr. Kenny," aka "Pop," ("PATEL"), agreed to plead guilty to one count of benefitting financially from peonage, slavery, and trafficking in persons, in violation of 18 U.S.C. § 1593A, as charged in the Superseding Bill of Information. If this matter were to go to trial, the Defendant agrees that the Government would prove, through the introduction of competent testimony and admissible tangible exhibits, the following facts, beyond a reasonable doubt:

The Defendant, **PATEL**, owned the Riviera Motel, located at 6042 Chef Menteur Highway, New Orleans, in the Eastern District of Louisiana, from in or about 1979 until July 2013. After the sale of the motel, **PATEL** continued to live there in the Summer and Fall of 2013.

From in or about January 2013 through June 2013, **PATEL** and other Motel staff rented rooms to co-defendants Granville Robinson, Duane Phillips, Anthony Ellis, Laquentin Brown, and others, even though **PATEL** knew that the co-defendants and others were pimps who forced and coerced adult women to engage in criminal sex acts. The defendant charged the codefendants and other pimps a higher rate than the general public, in order to compensate for the increased traffic they brought into the hotel. The co-defendants and others frequently rented multiple rooms, where the women would meet with clients. The defendant would open the gate to allow the women to bring customers back to the motel rooms.

On multiple occasions, **PATEL** learned that the co-defendants and other pimps beat the women who they forced and coerced to engage in commercial sex acts. He did not report these assaults to the police, even when the women asked him to do so. After one incident, **PATEL** learned that Robinson brutally beat a woman who was attempting to leave him. Robinson hit the woman repeatedly with what appeared to be a large piece of wood, while she screamed for help. As a result of the beating, the woman suffered multiple lacerations and what appeared to be a broken arm. **PATEL** also saw the damage that Robinson caused to a motel room during the beating. **PATEL** spoke to Robinson who acknowledged having beaten the woman who worked for him. The damage included a broken toilet, a damaged sink, and blood on the walls. **PATEL** agreed not to call the police after Robinson paid him for the damage.

**PATEL** also knew that, as part of their efforts to force and coerce women to engage in commercial sex acts, the co-defendants and other pimps would take the women's identification cards from them. **PATEL** saw the co-defendants and other pimps in possession of the women's identification documents which they used to rent hotel rooms in the women's names. **PATEL** did not call the police on his co-defendants as long as they paid the rent.

After he sold the motel, via owner-financing, in June 2013, **PATEL** was aware that the new owners continued to rent rooms to the co-defendants and other pimps, in order to make a profit. **PATEL** continued to live at the Riviera Motel in the Summer and Fall of 2013 and receive payments from the motel's new owners.

Both the Government and the Defendant, **KANUBHAI PATEL**, do hereby stipulate and agree that the above facts are true, and that they set forth a sufficient factual basis for the crimes to which the defendant is pleading guilty.

KANUBHAI PATEL (Date) Defendant JOHN COTTON RICHMOND (Date) Special Litigation Counsel Human Trafficking Prosecution Unit Civil Rights Division U.S. Department of Justice

PATRICK FANNING (Date) Counsel for Defendant CHRISTINE M. SISCARETTI (Date) Trial Attorney, Civil Rights Division U.S. Department of Justice

JULIA K. EVANS(Date)Assistant United States Attorney