

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO. 20-27
v. * SECTION: "H"
BIANCA ZELAYA-MERTENS *
a/k/a Maritza
a/k/a Jossi

* * *

FACTUAL BASIS

If this case were to proceed to trial, the United States would prove the following facts beyond a reasonable doubt:

On February 6, 2020, HSI New Orleans learned of a female individual, residing in Kenner, Louisiana, who was running a prostitution ring. On February 10, 2020, Waleska Miroslava Cabus-Alvarado was identified as that individual. That evening a confidential informant contacted Cabus-Alvarado via text message and Facebook messenger to determine if Cabus-Alvarado currently had any females working for her organization in the New Orleans area. Cabus-Alvarado answered that she routinely brought in new females each week and was bringing in a new female sex worker on February 10, 2020 and that female would be working from February 11 – 15, 2020. She messaged that she would reply on February 11, 2020 with pictures of the female and the hotel room in which she would be working. On February 11, 2020, the confidential informant received photos of a female in lingerie and notification that she was in Room 127 of the Evergreen Plaza Inn on Veterans Memorial Boulevard., Metairie, Louisiana.

AUSA _____
Defendant BE
Defense Counsel CE

On February 13, 2020, HSI conducted a sting operation. The sex worker was interviewed. She stated that she is citizen of Colombia living in Houston, TX, which was confirmed by her Colombian passport. She stated that Cabus-Alvarado contacted her on February 9, 2020 to ask if she wanted to come to New Orleans to make money for prostitution, working from February 11-15, 2020. She agreed and Cabus-Alvarado travelled to Houston, TX on February 10, 2020 to pick her up and bring her back to Room 127 of the Evergreen Plaza Inn in Metairie, LA.

During the sex worker's interview, Cabus-Alvarado made multiple attempts to contact her. At approximately 2300 hours Cabus-Alvarado arrived at the hotel. After being read her Miranda rights and freely signing a Miranda waiver, Cabus-Alvarado signed a sworn statement, stating that she started bringing women from Texas to Louisiana in the summer of 2019. Since then, she generally transported different women each week, by airplane and car, for the purpose of prostitution. She also explained that a recruiter from Baton Rouge referred to as "La Negra Fani" provides her with the women.

On February 15, 2020, HSI New Orleans conducted another undercover operation, with the intent of positively identifying the victims of human trafficking. With the assistance of a confidential informant, HSI was able to confirm the identity of BIANCA ZELAYA-MERTENS a/k/a Maritza, a/k/a Jossi. A confidential informant contacted ZELAYA-MERTENS on the telephone. Subsequently, ZELAYA-MERTENS communicated with the confidential informant via WhatsApp, a third-party messenger application, to schedule a time for a commercial sex act. ZELAYA-MERTENS replied that she was available and would meet the customer at the Monte Carlo Motel, where the confidential informant was located. She also replied with a picture of an unknown female.

When ZELAYA-MERTENS arrived, she was accompanied by the sex worker. The sex worker began to negotiate a commercial sex act with the confidential informant. The confidential informant paid the negotiated price. After the sex act was negotiated, but before the act occurred, an NOPD detective and HSI agents opened the door to the adjoining room and clearly announced “police”. The sex worker told agents that she contacted ZELAYA-MERTENS on February 10, 2020, to inquire about a job in New Orleans. ZELAYA-MERTENS told her that she could make money doing prostitution. She was given the address on Veterans Blvd in Kenner, LA.

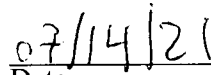
On Tuesday, February 11, 2020, she travelled from Houston, Texas to New Orleans and went to ZELAYA-MERTENS’ house. After arriving, ZELAYA-MERTENS told her she would be working by giving clients sensual massages which included having sex. She stated that she charged fifty dollars for each client, but she had to give ZELAYA-MERTENS twenty-five dollars.

ZELAYA-MERTENS was read her Miranda rights in the Spanish language, which she waived. Agents learned that she had been introduced to this line of work by Cabus-Alvarado, and arranged for women to come to Louisiana each week for prostitution. They both used “La Negra Fani” as a recruiter.

READ AND APPROVED:



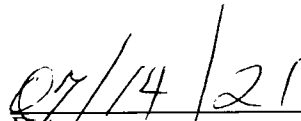
BIANCA ZELAYA-MERTENS
Defendant



Date



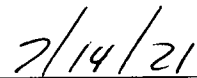
CATHERINE I. CHAVARRI
Counsel for Defendant



Date



TRACEY N. KNIGHT
Assistant United States Attorney



Date