

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America)

v.)

Esthela Clark)

Case No.)

3:15-mj-1093-J-PDB)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of see attached affidavit in the county of Duval in the Middle District of Florida, the defendant(s) violated:

Code Section

8 U.S.C. §§ 1324(a)(1)(A)(i), 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii); 1324(a)(1)(A)(iii), 1324(a)(1)(A)(iv); 18 U.S.C. § 1581(a); 18 U.S.C. § 1584(a); 18 U.S.C. § 1589(a); 18 U.S.C. § 1590(a); 18 U.S.C. § 1591(a); 18 U.S.C. § 1592(a); 18 U.S.C. § 1594(b); and 18 U.S.C. § 1594(c)

Offense Description

Bringing and conspiring to bring an alien to the U.S.; transporting an alien in the U.S.; harboring an alien; encouraging or inducing an alien to come to and enter the U.S. unlawfully; peonage; involuntary servitude; forced labor; trafficking with respect to peonage, involuntary servitude, or forced labor; sex trafficking by force, threats of force, fraud, or coercion; unlawful conduct with respect to documents in furtherance of trafficking, peonage, involuntary servitude, or forced labor; conspiracy to violate 18 U.S.C. §§ 1581, 1589, 1590, or 1592; conspiracy to violate 18 U.S.C. § 1591.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

Ashley Wilson signature

Complainant's signature

Ashley Wilson, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/28/2015

Patricia D. Barksdale signature

Judge's signature

City and state: Jacksonville, Florida

Patricia D. Barksdale U.S. Magistrate Judge

Printed name and title

I, Ashley Wilson, hereby swear and affirm as follows:

A. AGENT IDENTIFICATION AND QUALIFICATIONS

1. My name is Ashley Wilson, and I am a Special Agent with United States Immigration and Customs Enforcement ("ICE") / Homeland Security Investigations ("HSI"), an agency of the United States Department of Homeland Security ("DHS"). I have been a Special Agent with HSI for approximately 7 years and am currently assigned to the Office of the Assistant Special Agent in Charge Jacksonville, Florida. I participated in a 22 week training program at the Federal Law Enforcement Training Center in Brunswick, Georgia, which included the Criminal Investigator Training Program and ICE Special Agent Training. My instruction there included, without limitation, the following: basic criminal investigations, physical and electronic surveillance, undercover operations, organized crime investigations, money laundering, asset forfeiture, and the use of confidential informants. I also received training related to narcotics, human smuggling and trafficking, commercial fraud, and financial crimes.

2. As a Special Agent, I have participated in physical surveillance, undercover operations, informant and witness interviews, custodial and non-custodial interviews of suspects, consent searches, obtaining and executing arrest warrants and search warrants, electronic surveillance including court-authorized mobile tracking devices, the interception of wireless and electronic communications, consent and court-authorized searches of computers and other

electronic devices, and other investigative techniques. I have also participated in numerous investigations involving the illegal importation and distribution of controlled substances into and throughout the United States, human smuggling and trafficking, and the use, concealment, and exportation of the proceeds of narcotics and human smuggling and trafficking activities.

3. Unless stated otherwise, the statements I make in this affidavit are based on my own personal knowledge, experience, and training; my consultation with experienced investigators and agents who have conducted similar investigations; and other reliable sources of information relative to this investigation that I identify below. Because I make this affidavit for the limited purpose of establishing probable cause to support a complaint seeking the issuance of an arrest warrant for the offenses identified below, I have not included every fact that I know about this investigation in this affidavit. Rather, I have only included those facts necessary to establish probable cause for the issuance of an arrest warrant for the offenses detailed below.

4. The investigation of Esthela Clark ("CLARK") began with a citizen's complaint to a detective from the Jacksonville Sheriff's Office ("JSO") and is currently being investigated by HSI. I am the lead investigator assigned to this investigation.

B. OFFENSES AND INVESTIGATIVE SUMMARY

1. As set forth below, I am familiar with, and have probable cause to believe that CLARK has committed, attempted to commit, or conspired to commit

the following violations of applicable federal law: (a) 8 U.S.C. §§ 1324(a)(1)(A)(i) and 1324(a)(1)(A)(v)(I) (prohibiting bringing in and conspiring to bring in aliens unlawfully); (b) 8 U.S.C. § 1324(a)(1)(A)(ii) (prohibiting transporting an alien within the United States); (c) 8 U.S.C. § 1324(a)(1)(A)(iii) (prohibiting harboring aliens); (d) 8 U.S.C. § 1324(a)(1)(A)(iv) (prohibiting encouraging or inducing aliens to come to and enter the United States unlawfully); (e) 18 U.S.C. § 1581(a) (prohibiting holding any person in a condition of peonage); (f) 18 U.S.C. § 1584(a) (prohibiting holding another in involuntary servitude); (g) 18 U.S.C. § 1589(a) (prohibiting obtaining labor or services from another through various unlawful means, including force and threats of force, physical restraint and threats of physical restraint, serious harm and threats of serious harm, abuse of legal process and threats of abuse of legal process, or schemes, plans, or patterns leading to the belief of serious harm or physical restraint); (h) 18 U.S.C. § 1590(a) (prohibiting recruiting, harboring, transporting, providing, or obtaining by any means a person for labor or services in violation of federal laws under Chapter 77 of the United States Code); (i) 18 U.S.C. § 1591(a) (prohibiting sex trafficking of a person through force, threats of force, fraud, or coercion); (j) 18 USC § 1592(a) (prohibiting the destruction, concealment, removal, confiscation, or possession of passports, immigration documents, and other government identification documents during the course of certain enumerated offenses); (k) 18 U.S.C. § 1594(b) (prohibiting conspiracies to violate 18 U.S.C. §§ 1581, 1589,

1590, and 1592); and (l) 18 U.S.C. § 1594(c) (prohibiting conspiracies to violate 18 U.S.C. § 1591).

2. As detailed below, and by way of short summary, CLARK fraudulently induced a young woman from Mexico, Y.L., to travel illegally from Mexico to the United States under the fraudulent promise and pretense that Y.L. would be paid money to be a surrogate mother as part of a medically supervised and lawful surrogate pregnancy. After smuggling Y.L. into the United States, CLARK began attempting various non-medical inseminations of Y.L. with the semen of CLARK's boyfriend and others using a household syringe on the dining room floor of CLARK's residence. Once those efforts did not work, CLARK forced Y.L. to have sex with two complete strangers through threats of force and coercion. Shortly after Y.L. arrived in the United States, CLARK isolated Y.L., confiscated Y.L.'s official forms of identification, and used force, threats of force, and threatened abuse of legal process to maintain Y.L. in a perpetual state of peonage, involuntary servitude, and forced labor for over two years, until a concerned citizen finally rescued Y.L. from the situation in which CLARK had forced her to live and contacted law enforcement.

C. PROBABLE CAUSE

1. This investigation began on January 12, 2015, when Detective Brett Hougland, JSO, contacted HSI about a potential human trafficking matter. Detective Hougland advised Special Agent Anorine Ledet, HSI ("SA Ledet") that a member of Celebration Church, Iomara Miranda ("Miranda"), approached

Detective Houglund because Miranda was trying to help a young female who Miranda believed was a victim of human trafficking.

2. On January 23, 2015, SA Ledet contacted Miranda by telephone to discuss the allegations. SA Ledet completed a Report of Investigation ("ROI") about that call, and I have reviewed the ROI. The ROI relays the following:

a. Miranda removed a young female whose initials are Y.L. from Y.L.'s place of residence after Miranda saw that Y.L. had been physically abused by CLARK.

b. Miranda met Y.L. around November 2014. When Miranda first met Y.L., Y.L. spoke no English and was very reluctant to speak with Miranda. Miranda described Y.L. as acting like Y.L. was afraid of getting in trouble by talking with Miranda. Initially Y.L. also was afraid to tell Miranda where Y.L. lived.

c. Y.L. ultimately explained to Miranda how Y.L. came to be in the United States and that CLARK had smuggled Y.L. into the United States. CLARK and Y.L. both were from the same area in Guadalajara, Jalisco, Mexico.

d. Miranda explained that Miranda had observed Y.L. washing cars in very cold weather with insufficient clothing and found the behavior to be strange. Miranda also observed physical signs of abuse on Y.L. and, at that point, assisted Y.L. in escaping the situation. Miranda was permitting Y.L. to reside in Miranda's home.

3. On January 27, 2015, SA Ledet, Special Agent Michael Wood, HSI ("SA Wood"), Miranda, and Y.L. met at Miranda's residence to discuss the investigation further. SA Ledet prepared another ROI about what was said during this interview, and I have reviewed that ROI. I have also discussed the interview with SA Ledet and SA Wood. Y.L. did not speak fluent English, but did speak fluent Spanish. SA Wood and Miranda both speak Spanish and translated for Y.L. during the interview. During the interview, Y.L. was reluctant to speak with investigators without Miranda being present. Y.L. relayed the following information:

- a. Y.L. is a 26 year old female and was born and raised in Guadalajara, Jalisco, Mexico.
- b. Y.L. had no identification at the time of the interview. She entered the United States illegally through Piedras Negras, Coahuila, Mexico with the assistance of a smuggler. She arrived in Jacksonville, Florida on December 2, 2012.
- c. One of Y.L.'s friends in Mexico had introduced Y.L. to CLARK.¹ When they met, CLARK explained to Y.L. that CLARK and her boyfriend were looking for someone to be a surrogate and carry or have a baby for them. CLARK was willing to pay between \$3,000 and \$4,000 for this, and CLARK told Y.L. that the process would take place in a completely legal

¹ During the interview, Y.L. reviewed a Florida Driver's License photograph of CLARK and positively identified CLARK.

manner.² After the delivery, Y.L. would be returned to Mexico, and CLARK would pay Y.L. once the child was delivered and given to CLARK. CLARK explained that she knew a person who knew smugglers or “coyotes,” and CLARK would take care of having Y.L. smuggled into the United States. Y.L. agreed with this plan.

d. Prior to leaving Mexico, CLARK took Y.L. to a gynecologist in Mexico to insure that Y.L. had no medical conditions that would keep her from being a good surrogate. The gynecologist examined Y.L. and noted no issues.

e. CLARK provided Y.L. with a bus ticket to transport Y.L. from Guadalajara to Coahuila, Mexico. Y.L. still had a copy of the bus ticket and gave the copy to agents. Y.L. left Guadalajara on November 27, 2012, and arrived in Jacksonville on December 2, 2012.³ CLARK also gave Y.L. 100 pesos to use for food during the trip. CLARK advised Y.L. that when Y.L. arrived in Coahuila, Y.L. would stay in a hotel. When Y.L. arrived at the Coahuila bus station, however, Y.L. was taken to a house. Once there, individuals instructed Y.L. to telephone CLARK to tell her payment needed to be made for the next stage of the journey. Y.L. then left this residence and was transported to a house in San Antonio, Texas, where she stayed for another two or three days. From there, she was

² On May 14, 2015, SA Wood contacted Y.L. by phone to discuss more about what CLARK relayed about the manner of the surrogate relationship. Y.L. advised SA Wood that when initially approaching Y.L. about being a surrogate mother, CLARK advised Y.L. that the insemination and pregnancy would be done in a medically supervised fashion, that all legal paperwork would be processed, and that there would be a legal adoption prepared by an attorney.

³ In addition to the copy of the bus ticket that Y.L. provided agents, I have corroborated that CLARK was, in fact, in Mexico when the bus ticket was purchased. Customs and Border Protection crossing history reveals that CLARK crossed into the United States from Guadalajara, Mexico by commercial air liner on December 5, 2012. CLARK arrived in Atlanta, Georgia.

picked up and transported to another home in Houston, Texas and then boarded a van that took her to Jacksonville, Florida. During the trip, Y.L. made calls to CLARK at the instruction of the smugglers to arrange for further payment. Y.L. recalled the name of one of the smugglers as Marco Martinez, and his telephone number was (830) 513-7574.⁴ Y.L. gave agents a sheet of paper that Y.L. had kept with the phone number of Marco Martinez written on it. A second paper Y.L. had in her possession contained the name "Rafa" with phone number "(210) 422-4480." Y.L. advised agents Ledet and Wood that this number also pertained to a smuggler.⁵

f. When Y.L. arrived in Jacksonville, CLARK's son picked Y.L. up and transported Y.L. to CLARK's apartment, Unit 107 in the Les Chateau Condominiums, 7201 Arlington Expressway. The residence was a one-bedroom apartment, and Y.L. was there alone for one day before CLARK arrived.

g. When CLARK arrived and during the entire time that Y.L. was with CLARK, CLARK advised Y.L. that she could not leave the apartment because Y.L. spoke no English, the area was dangerous, and Y.L. most likely

⁴ I have reviewed subscriber information and toll records for the phone number (830) 513-7574. This number is a prepaid account that only lists an address of 17330 Preston Road, Dallas, TX. From subscriber information provided by T-Mobile and other sources, I know that CLARK used the mobile phone number (864) 202-9712. North Florida HIDTA crime intelligence analyst John Witherspoon analyzed toll records for CLARK's number, (864) 202-9712, and the number (830) 513-7574, and his analysis showed 32 telephone contacts between these numbers from December 11, 2012 to December 23, 2012. Four international calls to unknown numbers in Mexico also were reflected on the toll records for (830) 513-7574, all occurring on December 1, 2012.

⁵ I have reviewed subscriber information and toll records for this number, (210) 422-4480. The number is a prepaid account subscribed to Juana Medina, 123 Customer Lane, San Antonio, TX. John Witherspoon also conducted a toll analysis to determine whether any contacts took place between the numbers (830) 513-7574 and (210) 422-4480. Between November 13, 2012, and December 31, 2012, approximately 387 contacts took place between these two numbers.

would be killed. CLARK also advised Y.L. that CLARK read Tarrot cards, and if Y.L. ever tried to hide anything from CLARK, CLARK would find out, and there would be consequences.

h. During the time that Y.L. resided with CLARK in Jacksonville (December 2012 to January 2015), CLARK, Ronald Castellanos ("Castellanos") (CLARK's boyfriend), Jordan LNU (Clark's son), and Y.L. lived in the apartment. CLARK and Castellanos slept in the bedroom, Jordan slept on a couch in the living room, and Y.L. slept on the dining room floor.

i. About a week after Y.L. arrived in Jacksonville, CLARK began trying to inseminate Y.L. Contrary to what CLARK had told Y.L. in Mexico about the inseminations being medically supervised, whenever Y.L. was ovulating, CLARK and Castellanos would have sex using a condom. When Castellanos ejaculated, CLARK would transfer the semen from the condom to a plastic syringe and then insert the semen into Y.L.'s vagina. This took place three to four times a day during periods when Y.L. was ovulating and continued until approximately September 2013. Y.L. said the insemination happened on the dining room floor of the apartment where Y.L. slept. CLARK would instruct Y.L. to lie on pillows with her legs pointed in the air, naked from the waist down, and stay in that position for at least 20 minutes for the procedure to "take." Contrary to what CLARK had told her, the only "medical" attention Y.L. received

was trips to a clinic on University Boulevard in Jacksonville, Florida, where Y.L. received pregnancy tests.⁶

j. By March 2013, Y.L. had not conceived, and CLARK became angry. Y.L. advised that around this point, CLARK became psychologically and physically abusive to Y.L. Y.L. was able to recount a number of episodes of force and coercion, and they included the following:

(i). CLARK told Y.L. that she was not conceiving because Y.L. was "too fat." As a result, CLARK would not allow Y.L. to eat anything other than beans from a can. Y.L. indicated that she lost 65 pounds while she was with CLARK.

(ii). CLARK advised Y.L. that she was going to have to start having sex with other men because Y.L. was not fulfilling Y.L.'s end of the contract.

(iii). CLARK advised Y.L. that if she tried to escape, Y.L.'s family and child in Mexico would be harmed.

(iv). At one point, Y.L. suggested that Y.L. might not be conceiving because her menstrual cycles were irregular. CLARK then contacted a gynecologist in Mexico who sent CLARK medication. CLARK then made Y.L. take the medication. Y.L. described the medication as Geslutin, Progiluton, and Parlodel.⁷

⁶ As detailed below, I have corroborated these trips through medical records of the All Women's Health Center of Jacksonville.

⁷ SA Ledet advised me that she reviewed information about these drugs by conducting an internet search on the internet sites medication.com and medecinenet.com. Geslutin is another name for progesterone;

(v). CLARK prohibited Y.L. from washing or changing her clothing for days and weeks at a time.

(vi). On one occasion, Y.L. used bleach to clean the apartment because CLARK's dog had fleas. CLARK accused Y.L. of using too much bleach, and CLARK required Y.L. to sleep on the kitchen floor in a puddle of bleach as punishment.

(vii). CLARK often would force Y.L. to undress because CLARK was paranoid that Y.L. was hiding something.

(viii). CLARK physically beat Y.L. at least four or five times.

(ix). At times, CLARK would lock Y.L. out of the condominium for hours at a time with insufficient clothing during cold weather. On other occasions, CLARK would force Y.L. to wash CLARK's vehicles in insufficient clothing during cold weather.⁸

k. In October 2013,⁹ CLARK's boyfriend, Castellanos obtained a construction job in Missouri, and CLARK, Castellanos, and Y.L. travelled to Missouri. While in Missouri, CLARK continued trying to inseminate Y.L. using Castellanos' semen. CLARK also made Y.L. have sex with two different "Americans." CLARK advised Y.L. that she better do what was necessary to have sex with these men or else she would pay the consequence, which Y.L.

Progiluton is a drug indicated for hormone replacement therapy; and Parlodel is a drug used to treat Parkinson's disease, but the drug is also listed as a fertility drug.

⁸ Miranda corroborated seeing Y.L. washing cars in inappropriate clothing for the winter climate.

⁹ During a subsequent interview of Y.L. on February 27, 2015, Y.L. advised me that the Missouri trip described in this paragraph was between June 2013 to mid-September 2013.

interpreted as a further beating.¹⁰ Y.L. knew that one of the “American” men was a friend of the owner of the trailer park where CLARK, Castellanos, and Y.L. were staying.

l. While CLARK, Castellanos, and Y.L. were staying in the trailer in Missouri, CLARK told Y.L. that she could not leave the trailer or look out the window. CLARK told Y.L. that one of the neighbors was a murderer and a rapist. Once, CLARK came home and noticed that the curtains were moved. Y.L. advised CLARK that Y.L. had looked out of the window, and CLARK physically assaulted Y.L. for not obeying CLARK’s orders.

m. During another occasion in Missouri, a person Y.L. knew as “Juan Pablo” spoke with Y.L. and learned that Y.L. had not been permitted to communicate with Y.L.’s family. Juan Pablo provided Y.L. with a phone and money to facilitate communication by Y.L. with Y.L.’s family. CLARK learned of this, took the phone and money away, and beat Y.L.¹¹

n. When Castellanos finished his construction job in Missouri, CLARK and Y.L. returned to Jacksonville, Florida. Upon returning to Jacksonville, CLARK began taking Y.L. to a Jacksonville nightclub called 57 Heaven. CLARK met an American bartender there named Jason, and CLARK stated that she still wanted a baby. CLARK told Y.L. that “a gringo baby would be worth more.” CLARK demanded that Y.L. live up to their surrogate mother

¹⁰ As described below, I have partially corroborated what Y.L. told me about this by locating and interviewing one of the men.

¹¹ As noted below, during an interview in Mexico, Y.L.’s mother advised agents that she received a concerned call on her home telephone in Mexico from a person who identified himself as Juan Pablo in July 2013.

agreement and advised Y.L. that CLARK would have sex with Jason at the night club and would then try to inseminate Y.L. with Jason's semen. Y.L. advised that CLARK tried to inseminate her with Jason's semen three times, each taking place in CLARK's Avalanche vehicle.¹²

o. After returning to Jacksonville, Y.L. requested that CLARK permit Y.L. to work because Y.L. was just sitting in the house all day. CLARK agreed and told Y.L. that CLARK was not going to support her anymore. Y.L. advised that she worked for less than a month sometime between May 2014 and June 2014 at a restaurant called Cinco De Mayo in Jacksonville. Y.L. indicated that CLARK facilitated Y.L. obtaining a false identification and fake social security card in Y.L.'s name through one of CLARK's friends. At the time of the interview, Y.L. no longer had the false identification, but Y.L. did still have the social security card. That card bore social security number XXX-XX-5849. Y.L. advised that Cinco De Mayo paid her by check using the false social security number.¹³ Y.L. also advised that she worked at another restaurant for three weeks called Ole. Y.L. advised that she used the same false documents, but this restaurant paid Y.L. in cash.

p. At some point, Y.L. was able to contact her brother, Roberto Guzman ("Guzman"), a resident of Los Angeles, California and explain what was

¹² As discussed below, I have been able to corroborate that an individual named Jason Gordy worked at 57 Heaven from 2012 to the last quarter of 2013.

¹³ As set forth below, Cinco De Mayo paid to the holder of Social Security number XXX-XX-5849 the sum of \$570.96 during the second quarter of 2014. Through a CLEAR search, I have verified that social security number XXX-XX-5849 is actually issued to a person whose initials are J.A.V. in Oakland, CA.

happening to her. Guzman contacted CLARK by phone and offered to take Y.L. CLARK advised Guzman that the \$4,000 she had spent on Y.L. had now increased to \$10,000, and Y.L. was not going anywhere until CLARK got a baby or the money.

q. At the conclusion of the interview of Y.L., Miranda, who had been helping to interpret, advised agents that even after a month of being away from CLARK, Y.L. still asked permission to do common things like take a bath, watch television, etc.

4. On February 23, 2015, I and United States Border Patrol ("USBP") Agent Greg McConnell met with Y.L. and Miranda to speak about the investigation further. During this interview, Y.L. advised me of the following additional information:

a. During Y.L.'s interactions with CLARK in Mexico, CLARK asked Y.L. to provide CLARK with Y.L.'s Mexican birth certificate. CLARK indicated she needed the birth certificate to obtain a Mexican passport. CLARK never returned the birth certificate. Y.L. said that she asked CLARK several times for this document, but CLARK refused. Y.L. advised that she had seen her birth certificate once in CLARK's residence along with other papers that were located in a blue and white "Belk" shopping bag at 7201 Arlington Expressway, No. 107. The sighting was in 2013. In connection with a subsequent trip CLARK took to Mexico, Y.L. observed CLARK give the blue and white bag to her daughter, Jazmin Soltero. While CLARK was in Mexico, Y.L. asked Jazmin

Soltero for the birth certificate, but Jazmin Soltero advised Y.L. that Y.L. would have to get it from CLARK.

b. Y.L. also described meeting CLARK's other son, Yosgart Emiliano Soltero, who went by the name Eric, once while CLARK was in Mexico. Y.L. indicated that Eric offered to help Y.L. and gave Y.L. \$200 to pay for Y.L.'s cell phone, unaware that Y.L. had no cell phone. Y.L. stated that when CLARK learned about this, CLARK ordered her daughter, Jazmin Soltero, to take the money from Y.L. and to send it by wire transfer from the La Raza Grocery Store located at 21 Arlington Road North to Guatemala where the family of CLARK's boyfriend, Castellanos, resided.

c. On another occasion, CLARK and Y.L. visited Eric in Orlando. On this occasion, CLARK ordered Y.L. to rise early and clean Eric's home without pay.

d. Y.L. also clarified the interactions with the person named Jason from 57 Heaven. Y.L. stated that CLARK and Jason would have sex at Jason's home, while Y.L. remained in CLARK's Avalanche in front of Jason's home. CLARK would then use a syringe to try to inseminate Y.L. with Jason's semen, and this took place in CLARK's Avalanche. Y.L. indicated this took place two to three times between the middle of September 2013 through January 1, 2014.

e. Y.L. also shared that during CLARK's last trip to Mexico, on December 5, 2014, Miranda had permitted Y.L. to use Miranda's phone to speak

by telephone with Y.L.'s family in Mexico. Y.L.'s family informed Y.L. that CLARK had met with Y.L.'s family, told them that Y.L. had a new boyfriend that Y.L. no longer lived with CLARK, that Y.L. had a new phone number, and that Y.L. wanted nothing to do with her family in Mexico anymore. On December 7, 2014, CLARK advised Y.L. that CLARK had also met with the father of Y.L.'s son, shown him a video of Y.L. in America, and threatened to show the same video to Y.L.'s family if Y.L. told her family about what CLARK had been doing to her. Y.L. advised that she subsequently talked to the father of her four-year-old child, Luis Becerra, and he told Y.L. that he had seen a video of Y.L., did not recognize her anymore, and did not want to speak to her anymore because she was so dirty.¹⁴

5. On February 27, 2015, SA Wood and I met with Y.L. to discuss the investigation further and to specifically discuss what happened when CLARK transported Y.L. to Missouri. During this meeting, Y.L. relayed the following information:

a. Y.L. stated that prior to leaving Mexico, CLARK wrote CLARK's phone numbers on a business card. CLARK also gave Y.L. an international calling card to use during the journey to America. Y.L. still had both documents and gave them to me. The front of the business card said Pau's Studio with A Mendez Valderrama, Master Nails Designer written on it and was blank on the back. The blank, white side had the numbers 001864-202-97-12

¹⁴ Luis Becerra recently advised Y.L. that the video depicted her smoking marijuana.

and the letters "mex"¹⁵ written and 1-864-202-9712 with the letters "E.U."¹⁶ Y.L. said that the smugglers who brought her to the United States gave her a cellular telephone to use during the trip, but retrieved it once Y.L. was present in the United States.

b. Y.L. stated that after Y.L. arrived in Jacksonville, Florida, CLARK told Y.L. that CLARK would help Y.L. wire money back to her boyfriend in Mexico.¹⁷ Y.L. advised that CLARK helped her do this only one time on March 5, 2013. Y.L. had a receipt showing a MoneyGram transaction from Y.L. to Luis Becerra (the father of Y.L.'s child) in Mexico in the amount of \$40 on March 5, 2013. Y.L. advised me that Y.L. completed all of the form except the sender's address and phone number, which CLARK completed. CLARK listed the address as 1196 Sunray in Jacksonville, Florida, not the apartment. Y.L. stated that CLARK told Y.L. that CLARK did not want Y.L.'s family to know CLARK's real address. The form also displayed Y.L.'s phone number, but listed that as CLARK's phone number, (864) 202-9712.

c. Y.L. advised that she left Jacksonville to go to Missouri with CLARK in June 2013 and stayed in Missouri with CLARK until September 16, 2013, or September 17, 2013. Y.L. indicated that CLARK drove CLARK's black Mustang to Missouri.

¹⁵ During a meeting with Y.L. on May 26, 2015, Y.L. advised agents CLARK told Y.L. to call her on this phone number while Y.L. was still in Mexico during Y.L.'s trip to the United States.

¹⁶ I know based on my training and experience that EU is a shorthand reference in Spanish for the United States and stands for Estados Unidos.

¹⁷ During a phone call between Y.L. and SA Wood on May 20, 2015, Y.L. advised SA Wood that when Y.L. first met CLARK in Mexico, CLARK promised to periodically give Y.L. money to send back to Y.L.'s family in Mexico.

d. Y.L. stated that Castellanos, CLARK, and Y.L. stayed in a hotel for about a week and then moved into a trailer park. Y.L. did not recall the specific name of the trailer park, but recalled that it was located near a middle or high school. Y.L. believed the number on the trailer was either 21A or 22A, and the trailer was gray, with a black bottom, had three rooms, and a bathroom.

e. Y.L. stated that the person who collected the rent for the trailer was a tall, white man with blonde hair and green eyes who was about 45 years old. Y.L. believed the owner of the trailer park was the brother of the man who collected the rent because CLARK told Y.L. this. Y.L. also recalled a handyman who worked at the trailer park who was in his 60s or 70s, had a mustache and medium complexion, and went by the name "Robin."

f. Y.L. recalled that while they were in Missouri, CLARK took Y.L. to various commercial establishments, including Dollar Tree, CiCis Pizza, and Wal-Mart.

g. While in Missouri, CLARK advised Y.L. that since the inseminations were not working, Y.L. would have to have sex with an "American" man in the "traditional" manner (sexual intercourse). Y.L. did not want to have sex with this person, but felt that it would get her out of the situation in which she was in and felt that she had no other option. Thus, Y.L. complied with CLARK's demand, and this took place with a friend of the man who collected rent on one occasion.

h. On another occasion in Missouri, CLARK made Y.L. have sex with another unknown "American" man. Y.L. described that CLARK observed this man in Wal-Mart, approached him, and then told Y.L. that CLARK had told the man in English that Y.L. was asking about him (even though Y.L. was not). Y.L. advised that two to five days later, CLARK called this man and invited him to the trailer. CLARK told Y.L. that Y.L. knew why the man was coming over, and Y.L. understood this to mean she had to have sex with this "American" as well, even though she did not want to do so.

i. Y.L. relayed that when the man named Juan Pablo tried to give Y.L. money and a phone in Missouri, CLARK made Y.L. return the money and phone to Juan Pablo. After this, CLARK told Y.L. that Y.L. had to give CLARK her Mexican voter's registration card because Juan Pablo was pressing charges against Y.L. over the phone and the money. CLARK told Y.L. that Castellanos had paid between \$3,000 and \$6,000 for a bond to bail Y.L. out, and Y.L. had to provide the attorney with Y.L.'s identification.¹⁸ Y.L. complied and gave CLARK her Mexican voter's registration card. Whenever Y.L. would request return of the card, CLARK would tell Y.L. that the attorney in Missouri kept the card.¹⁹

j. Y.L. recalled that sometime between June and July 2014, Y.L. actually was able to purchase her own cell phone while working at the Ole

¹⁸ I have spoken with Detective Megan Keith with the Jackson, Missouri Police Department. Detective Keith advised me that no court cases, civil or criminal, have been filed in that jurisdiction against Y.L.

¹⁹ To date, Y.L. has never received the return of her voter's registration card. As noted below, a copy of this card does exist and corroborates that prior to the Missouri trip, Y.L. had this card.

Mexican Restaurant. Y.L. stated that CLARK knew Y.L. had purchased the cell phone and did not object, but in less than a month, CLARK took the phone away from Y.L. Y.L. wrote the number for that phone on piece of paper and advised that the number was (904) 518-0580. Y.L. has not seen the phone since CLARK took the phone away. In a subsequent phone conversation with SA Wood on May 20, 2015, Y.L. said that the phone was a thin, black LG cellular phone with no case. Y.L. said the phone contained a photograph of CLARK's daughter, Jazmin Soltero.

k. Y.L. relayed that after CLARK took the cell phone away from Y.L., Y.L. had no place to store contact numbers, so Y.L. started writing numbers on sheets of paper. CLARK frequently would go through Y.L.'s personal effects, and when CLARK learned about the handwritten numbers, CLARK and CLARK's daughter, Jazmin Soltero, took the papers away from Y.L. This happened more than once, with either CLARK or CLARK's daughter taking the papers.

l. Y.L. relayed that CLARK left the United States and traveled to Mexico in September 2014 and did not return until December 22, 2014. Y.L. advised that CLARK told Y.L. that Y.L. had to pay the electric bill while CLARK was gone because Y.L. was the one staying there and Y.L. was not going to stay for free. Because Y.L. could not pay the bill, the electric service was turned off for non-payment. Y.L. stayed in the apartment several days without power and

told CLARK's daughter, who then paid the bill. CLARK advised Y.L. that Y.L. now owed CLARK the money for this expense too.²⁰

m. In early December 2014, Y.L. was able to find work at the J'ville Crab Shack No. 4 located at 937 North Arlington Road. This was within walking distance of CLARK's apartment. Y.L. made approximately \$40 to \$50 in cash per day, but only worked there for about a week because she did not speak English. Y.L. advised that she was required to give the money she made (about \$180) from this business to CLARK's daughter to pay for the electric reconnection.

n. In mid-December 2014, Y.L. was continuing to look for employment due to the overdue electric bills she was required to pay. Y.L. found work at Napoli's Pizza located at 5624 Arlington Road, Jacksonville, Florida through an owner named Nora. Y.L. worked for approximately \$20 to \$30 per day at this restaurant. While working there, Y.L. was able to meet several friends. Y.L. relayed that on January 4, 2015, Y.L. had coffee and played cards with one of these friends. When she returned to CLARK's apartment, CLARK was extremely angry and physically hit Y.L. causing bruising and scratches to Y.L.'s face. CLARK then advised Y.L. that she was no longer permitted to work with Nora.²¹

o. Y.L. reported again that she lost significant weight as a result of CLARK's physical and psychological abuse. CLARK would physically abuse

²⁰ As noted below, information from the Jacksonville Electric Authority corroborates this information.

²¹ A photograph described below and taken by Miranda depicts these injuries.

Y.L. by hitting Y.L. with CLARK's hands and kicking Y.L. in the stomach and legs. CLARK also used a metal stick once and hit Y.L. with the metal stick until the stick bent.

6. On March 13, 2015, SA Wood and I met with Y.L. This meeting took place because Miranda had contacted agents on March 5, 2015, to advise that she and Y.L. located a photograph of the bartender named Jason on the Facebook page of 57 Heaven. During the interview, Y.L. positively identified the bartender as Jason Gordy from a Florida Driver's license photograph.²² We also showed Y.L. Google map photographs of the Parkwood Lake Estate mobile home park in Cape Girardeau, Missouri. Y.L. positively identified the trailer park as the location where Y.L. had stayed. During this interview, Y.L. also advised that when she first arrived in Jacksonville on December 2, 2012, CLARK's son picked her up, and she observed CLARK's son hand cash to the driver of the vehicle that had transported her. Y.L. identified CLARK's son as Jordan S. Zamora from a Florida driver's license photograph.

7. On May 26, 2015, SA Wood and I met with Y.L. to discuss the types of things CLARK routinely made Y.L. do while Y.L. was with CLARK. SA Wood provided translation during this meeting. During the meeting, Y.L. advised that during the period of time she was with CLARK in the United States, Y.L. was "like a maid." Y.L. explained that she was responsible for doing things like

²² I have reviewed records from the Florida Department of Revenue in Tallahassee, Florida that reveal Jason Thomas Gordy was employed by Conlea, Inc. between the first quarter of 2012 through the last quarter 2013. According to records maintained by the Florida Division of Corporations, Conlea, Inc. is the registered owner of the fictitious name 57 Heaven.

walking CLARK's dog named "Fancy," sweeping and mopping CLARK's apartment, cleaning the bathroom in CLARK's apartment (to include the tub, sink, and toilet), washing CLARK's clothes, helping with cooking, cleaning dishes, washing cars, and conducting personal shopping for CLARK, all without any compensation from CLARK.

8. With regard to Y.L.'s current immigration status, HSI has authorized Continued Presence status for Y.L., and Y.L. was issued a Form I-94. HSI has also authorized employment for Y.L., and she was issued an Employment Authorization Card. Both documents are valid until February 26, 2016. Y.L. also has applied for and received a valid Social Security Card. Despite these potential benefits to Y.L., I have found Y.L.'s information to be very reliable, and I have been able to corroborate many of the things that Y.L. has relayed through things like statements of other witnesses, records Y.L. provided me, business records provided by third parties, and photographs. Some of the more significant corroboration includes the following:

a. Y.L.'s family members corroborate what Y.L. has stated. On March 7, 2015, HSI Special Agent Leslie Derewonko ("SA Derewonko"), a member of the HSI Mexico City office, interviewed Y.L.'s parents, Roberto Lopez-Macias and Luz Elena Guzman Barajas, as well as Y.L.'s sister, Lilia Del Rocio Lopez Guzman. During this interview, these individuals provided the following information:

(i). Each was familiar with CLARK because CLARK had a residence in their town. Each identified CLARK's photo from a photo array containing a photograph of CLARK and five other persons.

(ii). During the interview, Lilia Del Rocio Lopez Guzman advised that Y.L. had informed her that CLARK offered Y.L. 100,000 Pesos to carry an inseminated embryo and act as a surrogate mother. Lilia Del Rocio Lopez Guzman stated that Y.L. was to be transported to the United States and attend a clinic where the inseminated embryo would be medically inserted, and Y.L. would receive prenatal care during the entire period. Lilia Del Rocio Lopez Guzman recalled getting a call at the end of November 2012 from Y.L., and it sounded like Y.L. was at a bus station. Y.L. advised that she was leaving for the United States.

(iii). Y.L.'s mother, Luz Elena Guzman Barajas, did not speak with Y.L. for three months after Y.L. left. Luz Elena Guzman Barajas then obtained a phone number from the father of Y.L.'s child, and Luz Elena Guzman Barajas called the number. When she did, CLARK answered the phone. Luz Elena Guzman Barajas asked to speak with her daughter, and she could hear her daughter start crying. Y.L. then got on the phone and told her mother that Y.L. was ok, not to be concerned, that the doctor was going to begin the insemination, and that Y.L. was going to stay there for nine months until the child was born. Y.L. stated that she was eating well and receiving her vitamins. Luz Elena Guzman Barajas could hear that Y.L. was being coached on what to say in

the background noise of the call. Two years later, Y.L. informed her mother that the calls were always on speaker phone, and CLARK was listening.

(iv). Y.L.'s father, Roberto Lopez-Macias, stated that he held a visa and wanted to go to the United States and visit Y.L. However, Y.L. would not provide an address. The only address he could get from CLARK was 1196 Sunrise Street, Jacksonville, Florida. He also knew CLARK's number, (864) 202-9712 had been disconnected.²³

(v). At some point during October 2013, Y.L.'s parents saw CLARK in Tonala, Jalisco, Mexico at a church. They asked about their daughter, and CLARK informed them that Y.L. was doing well, and CLARK's daughter was watching over Y.L. A short time later, Y.L.'s mother and two daughters went to CLARK's apartment in Mexico and confronted CLARK about Y.L. During that interaction, they asked CLARK why CLARK was keeping Y.L. CLARK replied that CLARK wanted another baby that would be fertilized by her boyfriend. When Y.L.'s mother asked why CLARK would not permit Y.L. to speak with her family, CLARK responded that the family gets Y.L. all worked up, and Y.L. needed to remain calm. Y.L.'s sister asked CLARK why CLARK would not let Y.L. leave, and CLARK responded that immigration would arrest Y.L. if Y.L. left the house, and CLARK also had accrued \$4,000 in expenses in getting Y.L. to the United States. CLARK was unaware at the time that one of Y.L.'s

²³ According to records I have reviewed, all toll activity on CLARK's cellular phone ceased in July 2014, with a complete disconnection of service in March 2015. I do not know if this is the same period referenced by Y.L.'s father, though.

sisters was recording their interaction. Y.L.'s family provided a copy of that recording, and the interaction lasts about an hour. The entire recording is in Spanish, but other ICE/HSI personnel who have listened and paraphrased the recording advised me that CLARK stated on the recording that CLARK had not kicked Y.L. out of her house because CLARK did not want to lose out on all the money CLARK had already spent. CLARK indicated this sum included not just the \$6,000 for the smuggler, but also all of the doctor visits CLARK had paid for. Several times during the recording CLARK references her agreement with Y.L. for having a child. CLARK also suggests that doctors told Y.L. she was not conceiving because Y.L. was too fat. At one point during the recording, CLARK permits Y.L.'s family to speak with Y.L. Although Y.L. indicates Y.L. is ok, Y.L. can be heard crying on the recording, and Y.L.'s family members seek to calm her.

(vi). The family members relayed that sometime in 2013, CLARK had made phone contact with Y.L.'s brother, a United States citizen, and demanded that he pay \$4,000 for the expenses CLARK had incurred. CLARK then made a second call to Y.L.'s brother and demanded \$6,000. Y.L.'s brother advised that he was not paying anything.

(vii). At some point in July 2013, Y.L.'s mother received a call from a person who identified himself as Juan Pablo. Juan Pablo stated that he worked construction in Missouri and wanted to save their daughter and could loan \$6,000 to pay CLARK. Juan Pablo advised that their daughter was scared

and could not talk with Juan Pablo long. Juan Pablo advised that he loaned their daughter a phone, but when CLARK found out, CLARK became very upset and told Y.L. to never take anything from anyone again.

(viii). In October 2013, Y.L.'s sister, Lilia Del Rocio Lopez Guzman, received a phone call from Y.L. Y.L. informed her sister she had made a big mistake. CLARK then grabbed the phone from Y.L. and began yelling about how stupid Y.L. was. CLARK stated that Y.L. had washed CLARK's puppy in Clorox and advised that if the puppy died, they would be responsible. CLARK demanded Y.L.'s sister send CLARK money for Y.L.'s expenses.

b. Y.L. is familiar with CLARK's motor vehicles. A check of DAVID (the Florida driver and vehicle identification database) revealed that CLARK is the registered owner of three motor vehicles in Florida, a 2003 Silver Chevrolet Avalanche, Florida license tag H72-1PV, a 2003 blue Chevrolet Cavalier, Florida license tag A08-7UX, and a 2004 black Ford Mustang, Florida license W16-7TL. On January 28, 2015, I observed and photographed all three vehicles at 7201 Arlington Expressway, Unit 107. On January 29, 2015, SAs Ledet and Wood displayed these photographs to Y.L., and Y.L. positively identified each of the vehicles as belonging to CLARK.

c. Wire transfer records corroborate what Y.L. has said. As noted above, Y.L. reported that she obtained a \$500 MoneyGram in Houston, Texas, when she arrived in the United States to provide cash payment to CLARK's smugglers. I have reviewed records from MoneyGram that reveal that

on December 3, 2012, a \$500 wire transfer was sent in the name of Carlos Ramirez,²⁴ 743 Hendenville Road, Harrodsburg, KY to Y.L. at 2830 Sherman, Houston, TX. The money was sent from a Wal-Mart in Kentucky to the 1% Cambiamos Cheques at 900 South Wayside Drive, Houston, TX. I conducted a CLEAR database check of the address 2830 Sherman in Houston, Texas, and that address appears to be non-existent.

d. Pregnancy clinic records corroborate what Y.L. has said. As noted above, Y.L. advised agents that CLARK took her to a women's clinic on University Boulevard for pregnancy testing. On February 23, 2015, I and USBP Agent Greg McConnell drove Y.L. along University Boulevard, and Y.L. identified the All Women's Health Center as the Clinic where CLARK took her. I and USBP Agent McConnell then met with the manager of the clinic, Ms. Regina Neary. Neary advised us that the clinic provided pregnancy tests for \$10. Neary stated that if the patient was a foreign national, the clinic's routine practice was to staple a copy of the patient's identification to the clinic's daily sheet. Neary then researched her records and located daily sheets reflecting visits by Y.L. on February 28, 2013, and March 22, 2013. Each visit reflected a \$10 cash payment, and a copy of Y.L.'s now-missing Mexican voter identification card was attached to the document.

²⁴ Carlos Ramirez is the known alias of CLARK's boyfriend, Ronald Castellanos-Marin. I know this because I have reviewed CBP documents showing that on October 5, 2013, Ronald Castellanos-Marin was refused entry to Canada at the Canadian border. At the time, Castellanos was using the alias Carlos Ramirez. Y.L. also has advised me that Castellanos used that alias.

e. Hotel records corroborate what Y.L. has said. As noted above, Y.L. advised that when CLARK took her to Missouri, Y.L., CLARK, and Castellanos stayed in a hotel in Missouri before moving into a trailer park. On March 27, 2015, Y.L. was able to identify the Town House Inn in Cape Girardeau, Missouri as the hotel from reviewing Google map photographs. I have reviewed hotel folio records from the Town House Inn reflecting the rental of room 214 for one night to CLARK on June 17, 2013, for \$48.09 in cash. The hotel obtained CLARK's Florida driver's license number (confirmed by me through the Florida DAVID database) and CLARK's phone number, (864) 202-9712. The hotel also produced a folio reflecting the rental of room 107 the next day, and that stay was from June 18, 2013, to June 25, 2013, under the name Carlos Ramirez, the known alias of Castellanos. Cash and credit card payments totaling \$286.64 also were reflected.

f. Parkwood Lake Estate business records and owners also corroborate what Y.L. said. As noted above, Y.L. reported that when CLARK took her to Missouri, CLARK, Y.L., and Castellanos moved to a trailer park after about a week in Missouri. Y.L. was able to positively identify the trailer park as the Parkwood Lake Estate trailer park. On May 7, 2015, SA Wood and I spoke with Monty Montgomery, an owner of the Parkwood Lake Estate trailer park. Monty Montgomery advised that on an unknown date, he received a phone call from a woman named "Stella" about getting a temporary rental. A day or two later, Monty Montgomery and his handyman, Ruben Pikey, met with "Stella" and

another woman who "Stella" introduced as her niece. The meeting took place at a Huddle House restaurant. The woman identified as the niece spoke no English. "Stella" told Monty Montgomery that the trailer rental needed to be in the name of her boyfriend, Carlos Ramirez. Monty Montgomery reviewed a photo array that contained a photograph of CLARK. Monty Montgomery identified CLARK's photo as "Stella." Monty Montgomery also reviewed a single photograph of Y.L., and Monty Montgomery identified Y.L. as the woman who "Stella" introduced as her niece. On May 7, 2015, SA Wood and I also interviewed Mr. Ruben Pikey, a maintenance man for the Parkwood Lake Estate trailer park. Mr. Pikey recalled two women who appeared to be transient renting the trailer. Pikey recalled that he and one of the owners of the trailer park, Monty Montgomery, met with the women at a Huddle House Restaurant prior to the women moving in. The women were staying at the Town House Inn. Pikey only recalled speaking with the older of the two women about fixing the door to the trailer, and he did not recall communicating with the other woman. I have also reviewed records maintained by the Parkwood Lake Estate trailer park that were provided to me by Betty Montgomery, an owner of the trailer park. These records show between June 26, 2013, through September 5, 2013, "Carlos Ramirez" leased lot 10 at the trailer park. I have also reviewed receipts showing "Carlos Ramirez" paid \$700 in cash on June 26, 2013, and \$450 in cash on August 5, 2013.

g. An American man who had sex with Y.L. corroborates what she said. As noted above, Y.L. advised agents that CLARK forced her to have sex with "Americans" while staying at the trailer park in Missouri. On April 22, 2015, Y.L. saw a photograph that I received from Detective Megan Keith from the Jackson, Missouri Police Department depicting a person named Christopher Montgomery. Y.L. stated that this person was the man who collected rent while they lived in the trailer park, and CLARK forced her to have sex with one of this man's friends.

(i). On May 6, 2015, SA Wood, Detective Megan Keith, and I conducted a personal interview of Christopher Montgomery in Cape Girardeau, Missouri. During this interview, Christopher Montgomery stated that about three years ago, he met a woman named "Stella" at the Parkwood Lake Estate trailer park. "Stella" told him she lived in Florida. "Stella" was with another girl who did not speak English. Christopher Montgomery stated that "Stella" came on to him, tried to date him, and they spoke with each other by telephone. Christopher Montgomery said that the other female with "Stella" slept in the back bedroom of the trailer on the floor. Christopher Montgomery also reviewed a photo array that contained a photograph of CLARK. Christopher Montgomery identified CLARK's photo as "Stella."²⁵ Christopher Montgomery also stated that a friend of his named Ronnie Kiefer had sex with the woman who was with "Stella" for about 10 or 15 minutes in the trailer. Christopher

²⁵ Christopher Montgomery also misidentified a single photograph of Y.L. as "Stella" (the photo was from 2015 after Y.L. lost significant weight from being with CLARK).

Montgomery said that he and "Stella" were in the trailer talking while the other woman and Ronnie Kiefer were having sex in another room. Christopher Montgomery stated that Ronnie Kiefer did not pay money for the sex act.

(ii). On May 6, 2015, SA Wood, Detective Megan Keith, and I conducted an interview with Ronald Kiefer. Ronald Kiefer advised that he had gone to the Parkwood Lake Estate trailer park with Christopher Montgomery about a year and a half ago and went inside a trailer where there was an older woman who spoke English and a younger woman who spoke only a few words, but not in English. Ronald Kiefer reviewed a photo array that contained a photograph of CLARK. Ronald Kiefer identified CLARK's photo as the older woman. Ronald Kiefer could not identify photographs he reviewed that depicted Y.L. Ronald Kiefer advised that he went into a back bedroom with the younger female, the younger female undressed, and they began having sexual intercourse for about 10 or 15 minutes. Ronald Kieffer stated that he used a condom that he provided. Ronald Kieffer said that he felt uncomfortable and stopped the sex act after about two minutes. Ronald Kieffer said that the younger woman did not say anything. Ronald Kieffer advised that he did not pay for the sex act, and he has had no contact with either the older woman or the younger woman since then.

h. Bank records corroborate what Y.L. said. As noted above, Y.L. advised that CLARK took her to Dollar Tree, CiCi's Pizza, and Wal-mart while they were in Missouri. I have reviewed CLARK's Wells Fargo bank account

records from June 2013 until September 17, 2013. These records reflect one financial transaction at CiCi's Pizza, one financial transaction at Dollar Tree, and five financial transactions at Wal-Mart, all of which took place in Cape Girardeau, Missouri.

i. State of Florida tax records corroborate what Y.L. said. As noted above, Y.L. advised agents that she worked for the Cinco De Mayo restaurant between May 2014 and June 2014 using a false social security number of XXX-XX-5849 obtained from a friend of CLARK. I have reviewed information from the Florida Department of Revenue showing that a corporation named Leon Valencia Corp. employed a person with this social security number during the second quarter of 2014. According to a search of the Florida Division of Corporations, Leon Valencia Corp. is the registered owner of the fictitious name Cinco De Mayo Authentic Mexican Restaurant No. 2. A response from the Florida Department of Economic Opportunities also showed that Leon Valencia Corp., doing business as Cinco de Mayo Authentic Mexican Restaurant #2 paid \$570.96 in wages to the person with this Social Security number.

j. Intermex wire transfer records corroborate what Y.L. said. As noted above, Y.L. reported that CLARK told CLARK's daughter, Jazmin Soltero, to take approximately \$200 from Y.L. and send it by wire to Guatemala while CLARK was in Mexico. I have reviewed records from Intermex, a service similar to Western Union that is offered by the La Raza Grocery in Jacksonville. These records reflect a wire transfer of \$200 in United States currency using

CLARK's name, address, and phone number for the sender and a recipient named Yeny Castellanos-Marin in Guatemala. The date of the transfer was December 10, 2014. According to United States Customs and Border Protection crossing history information, CLARK left the United States on an outbound flight to Mexico from Houston, Texas on September 29, 2014 and returned to the United States on an inbound flight from Mexico on December 22, 2014.

k. Utility records corroborate what Y.L. said. As noted above, Y.L. reported that when CLARK was in Mexico between September and December 2014, CLARK advised Y.L. that Y.L. had to pay the electric bill. Y.L. could not do so, and the power was turned off. Utility records from the Jacksonville Electric Authority ("JEA") for unit 107 show that a payment was made in the amount of \$184.66 on October 10, 2014, and no additional payments were made until a \$91.68 payment was made on January 20, 2015.

l. Phone records also corroborate what Y.L. said. As noted above, Y.L. reported that Y.L. obtained a cell phone assigned number (904) 518-0580 sometime in June or July 2014. CLARK initially permitted Y.L. to keep this phone, but took it away in less than a month. According to subscriber and toll information that I have reviewed from Verizon Wireless, phone number (904) 518-0580 was a prepaid number with no identified subscriber and a California address of 295 Park Shore Drive, Folsom, CA. Toll records show call details from July 30, 2014 to August 15, 2014, with an abrupt stoppage after that date.

m. A local employer corroborates what Y.L. said. As noted above, Y.L. reported working for a short period of time at Napoli's Pizza for a woman named Nora. On March 5, 2015, Agents Wood, McConnell and I proceeded to this restaurant and met with Maurice Walley and his wife, Nora Walley, the owners of the restaurant. We interviewed each separately.

(i). Maurice Walley advised that he first met Y.L. in early December 2014. Y.L. came to the business looking for work, and Maurice Walley's wife, Nora, reached out to Y.L. during the third week of December 2014. Y.L. provided no identification to work. Maurice Walley advised that his wife, Nora, advised him that Y.L. had described the woman who she lived with as being domineering or controlling. Maurice Walley indicated that he saw the woman he thought Y.L. lived with on just one occasion toward the end of December 2014 or the beginning of January 2015. The woman arrived at the restaurant shortly after the restaurant had closed at 9:30 p.m. The door was already locked, and the woman exited the passenger side of a vehicle. The woman then knocked on the restaurant door. Maurice Walley opened the door and had about a 30-second conversation with the woman. Maurice Walley described the lighting as dark, with the only lighting from inside the restaurant. Maurice Walley said the woman asked where Y.L. was in English. Maurice Walley was shown a photo array containing six photographs, including a photograph of CLARK, and Maurice Walley thought that the person with whom he spoke was either CLARK or one other woman depicted in the photo array.

Maurice Walley also advised that his wife told him that the woman with whom Y.L. lived had hit Y.L. Maurice Walley recalled seeing Y.L. with a busted lip.

(ii). Nora Walley advised that Y.L. came to Napoli's Pizza Cuisine in early December 2014 looking for work. Nora Walley's sister was in town from Mexico, so she did not need help at that time, but told Y.L. to contact her in a few weeks. Nora Walley recalled that during this first meeting, Y.L. asked to use the phone, and Nora Walley thought it odd that Y.L. had no phone or no money to make a call. Y.L. then returned in the last half of December, and Y.L. helped her on the restaurant's food truck five to seven times between then and the beginning of January 2015. Y.L. wanted to work more, but told Nora Walley that the woman she lived with did not want her to do so. Y.L. told Nora Walley that the woman she lived with was named "Esthela," was from Jalisco, Mexico, and was not nice and mistreated Y.L. Nora Walley advised that she would occasionally pick Y.L. up near the condominium complex where Y.L. lived, but Y.L. would never tell Nora Walley exactly where Y.L. was living, and Y.L. said that she was afraid to tell her because of "Esthela." Y.L. told Nora Walley that Y.L. had a cell phone at one point, but "Esthela" took it away. Nora Walley also relayed that Y.L. would never use Nora Walley's cell phone to contact "Esthela" because Y.L. told Nora Walley that Y.L. did not want "Esthela" to have Nora Walley's number. Nora Walley advised that Nora Walley and her husband tried to find another place for Y.L. to live, but Y.L. was scared to leave. Y.L. shared with Nora Walley that "Esthella" had taken Y.L. to either Missouri or Illinois where

they lived in a trailer and "Esthella" forced Y.L. to have sex with men she brought to the trailer. Y.L. also relayed that Y.L. had been keeping her money (from working) in a safe place, but "Esthella" found it and took it. Nora Walley relayed that her husband had interacted with the woman with whom Y.L. was living on one occasion. Nora Walley recalled that on this night, she knew that Y.L. was socializing with a mutual friend named "Charli" who also goes by "Jorge."

n. An acquaintance corroborates what Y.L. said. As noted above, Y.L. reported that she had socialized with a friend on January 4, 2015, and when CLARK found out, CLARK beat Y.L. On March 13, 2015, Y.L. identified the person with whom she socialized as Eusebio Ramirez-Resendiz. Agents Wood, McConnell and I located Eusebio Ramirez-Resendiz and transported him to the United States Border Patrol station for questioning and processing. Eusebio Ramirez-Resendiz advised that he met Y.L. at the La Raza Mexican Grocery Store sometime in November 2014, and Y.L. was looking for work. Eusebio Ramirez-Resendiz gave Y.L. his phone number, and they became friends. Eusebio Ramirez-Resendiz stated that when he asked Y.L. about her living situation, she would not say much, and he assumed she was afraid to talk about it. Eusebio Ramirez-Resendiz would give Y.L. rides on occasion, but whenever he would drop her off at the complex where she lived, Y.L. would tell him to drop her off away from the actual residence because "she didn't want to have any problems." Eusebio Ramirez-Resendiz also advised that on one particular occasion, Y.L. saw CLARK's Avalanche parked in the parking

lot and instructed Eusebio Ramirez-Resendiz to drop her off away from the area because she did not want CLARK to know what car Eusebio Ramirez-Resendiz drove. Eusebio Ramirez-Resendiz also advised that on one occasion between November 2014 and December 2014, CLARK had obtained his phone number from Y.L., and CLARK called him. CLARK identified herself as "Esthela" and asked to speak with Y.L. Eusebio Ramirez-Resendiz stated that Y.L. was with him and was scared and told him to tell CLARK she was not with him. On another occasion, a person who claimed she was CLARK's daughter contacted Eusebio Ramirez-Resendiz and stated she was looking for Y.L. because Y.L. left a note in the apartment saying she was doing laundry, but Y.L. had not returned.

o. Y.L.'s brother, now a United States citizen, corroborates what Y.L. said. As noted above, Y.L. advised agents that her brother, Guzman, contacted Clark by phone and offered to take Y.L. CLARK advised Guzman that the \$4,000 she had spent on Y.L. had now increased to \$10,000, and Y.L. was not going anywhere until CLARK got a baby or the money. On February 20, 2015, Agent McConnell contacted Guzman and spoke with him about the investigation. During that call, Guzman advised that his true name was Roberto Espino, not Roberto Guzman. Espino stated that he did, in fact, contact CLARK on an unknown date because Y.L.'s parents were concerned about Y.L. CLARK advised Espino that she paid \$6,000 to have Y.L. smuggled into the country, and Y.L. was not leaving until CLARK received payment in full. Espino relayed that he subsequently spoke with Y.L. and told Y.L. to run away from CLARK. Y.L.

advised that she was fine. Subsequently, after getting away from CLARK, Y.L. advised Espino that CLARK was listening during this last call.

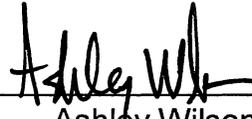
p. Finally, photographs corroborate what Y.L. said.

(i). On January 27, 2015, Miranda advised agents that she took a photograph of Y.L.'s injuries when Miranda made the decision to remove Y.L. from CLARK's condominium. On February 20, 2015, Miranda emailed SA Wood a digital photograph that Miranda took of Y.L. on January 5, 2015. Miranda explained to SA Wood that Miranda took the photograph to document the assault that CLARK committed on Y.L. I have reviewed the photograph, and it depicts Y.L.'s face and the injuries that Y.L. suffered to her face.

(ii). As noted above, Y.L. reported that she lost significant weight as a result of CLARK's conduct. I have reviewed two photographs of Y.L. Y.L. reported one photograph depicted her before she traveled to the United States to work for CLARK and the other photograph depicted her after Miranda got her away from CLARK. The photos depict that Y.L. has, in fact, lost significant weight.

9. Based on the facts set forth above, I have probable cause to believe that Esthela CLARK has committed the offenses listed in paragraph B.1.,

above, and respectfully request the issuance of an arrest warrant for CLARK's arrest.



Ashley Wilson, Special Agent
U.S. Immigration and Customs Enforcement
Homeland Security Investigations
Jacksonville, Florida

SWORN TO and SUBSCRIBED before me this 28th day of May, 2015.



PATRICIA D. BARKSDALE
UNITED STATES MAGISTRATE JUDGE