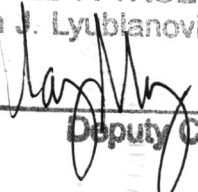


IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
PANAMA CITY DIVISION

CERTIFIED A TRUE COPY
Jessica J. Lyublanovits

By: 
Deputy Clerk

UNITED STATES OF AMERICA

SEALED
INDICTMENT

v.

5:15 cr 30 - RH

EDEGARDO OSORNO RODRIGUEZ

a/k/a "Edgar Rodriguez"

a/k/a "Edgar Panama"

a/k/a "Edgar"

ANTONIO FLORES-ESPARZA

a/k/a "Giovani Rodriguez-Ruvulcaba"

a/k/a "Antonio Flores"

a/k/a "Antonio Vargas Flores"

JOSE JUAN RUIZ PRUDENCIO

a/k/a "Jose Juan Ruiz-Prudencio"

a/k/a "Jose Ruiz Prudencio"

a/k/a "Juan Ruiz Prudencio"

a/k/a "Jose Ruiz"

a/k/a "Juan Ruiz"

a/k/a "Flaco"

a/k/a "El Flaco"

JOSE ALVARO TRUJILLO-SANTIZ

ROSA MIRTHA CRUZ VIDAL

a/k/a "Rosa Cruz"

MAURO GONZALEZ-LIRA

a/k/a "Chino"

ROMON TOBON

a/k/a "Roman Toban"

a/k/a "Tobon Roman"

a/k/a "Kalula"

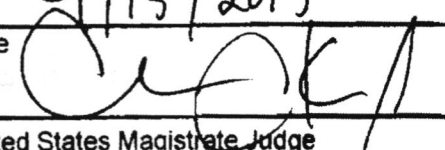
LAZARO JUAREZ-JUAREZ

a/k/a "Catracho"

and

EMERSON CORVERA

THE GRAND JURY CHARGES:

Returned in open court pursuant to Rule 6(f)	
Date	9/15/2015
	
United States Magistrate Judge	

COUNT ONE

A. THE CHARGE

On or about July 2014 and August 31, 2015, in the Northern District of Florida and elsewhere, the defendants,

EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"

ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"

a/k/a "Antonio Vargas Flores,"
JOSE JUAN RUIZ PRUDENCIO,
a/k/a "Jose Juan Ruiz-Prudencio,"
a/k/a "Jose Ruiz Prudencio,"
a/k/a "Juan Ruiz Prudencio,"

a/k/a "Jose Ruiz,"
a/k/a "Juan Ruiz,"
a/k/a "Flaco,"
a/k/a "El Flaco,"

JOSE ALVARO TRUJILLO-SANTIZ-SANTIZ,
ROSA MIRTHA CRUZ VIDAL,

a/k/a "Rosa Cruz,"

MAURO GONZALEZ-LIRA,
a/k/a "Chino,"

ROMON TOBON,
a/k/a "Roman Toban,"
a/k/a "Tobon Roman,"
a/k/a "Kalula,"

LAZARO JUAREZ-JUAREZ,
a/k/a "Catracho,"

and

EMERSON CORVERA,

did knowingly and willfully combine, conspire, and agree together and with others to commit the following offenses against the United States:

1. To knowingly transport an individual in interstate commerce, with the intent that such individual engage in prostitution, in violation of Title 18, United States Code, Section 2421.

2. To knowingly persuade, induce, entice, and coerce an individual to travel in interstate commerce to engage in prostitution, in violation of Title 18, United States Code, Section 2422.

3. To knowingly keep, maintain, control, support, employ, and harbor in any house and other place, for the purpose of prostitution and any other immoral purpose, an alien in pursuance of the importation of said alien into the United States, in violation of Title 8, United States Code, Section 1328.

B. MANNER AND MEANS

The manner and means by which the conspiracy was carried out included the following:

1. It was part of the conspiracy that the conspirators agreed to utilize females to work as prostitutes at various geographic locations.

2. It was further part of the conspiracy that the conspirators agreed to transport, arrange for transportation, and assist in the transportation of females to travel in interstate to engage in prostitution.

3. It was further part of the conspiracy that the conspirators would use females who were illegal aliens to engage in prostitution.

4. It was further part of the conspiracy that the conspirators maintained different geographic areas in which the conspirators supervised and controlled the

females engaging in prostitution, including Florida, Alabama, Mississippi, and Louisiana.

5. It was further part of the conspiracy that the conspirators would keep, maintain, control, and harbor females in houses and other structures for the purpose of prostitution.

6. It was further part of the conspiracy that the conspirators would transport females to specific locations to engage in prostitution with various males, and also would cause males to travel to certain locations to engage in prostitution with females.

7. It was further part of the conspiracy that the conspirators would establish the price for specific acts of prostitution, the amount of monies to be charged the customers, and the amount of monies the females would receive.

8. It was further part of the conspiracy that the conspirators would market the females to potential customers by describing their attributes, age, country of origin, and other qualities of the females to encourage the males to use the prostitution services of the females.

9. It was further part of the conspiracy that the conspirators would conduct financial transactions, including the wire transfer of monies outside the United States, with the proceeds of the prostitution activity.

10. It was further part of the conspiracy that the conspirators would perform acts and make statements to hide and conceal, and cause to be hidden and concealed, the purpose of the conspiracy and the acts committed in furtherance thereof.

C. OVERT ACTS

In furtherance of the conspiracy, and to accomplish the objects thereof, the defendants and other conspirators committed, and caused to be committed, at least one of the following overt acts in the Northern District of Florida and elsewhere:

1. Between on or about July 10, 2014, and on or about August 31, 2015, defendants **RODRIGUEZ**, **CRUZ-VIDAL**, and **TRUJILLO-SANTIZ** kept and maintained the premises at 604 Lantana Street, Panama City Beach, Florida, for females to stay once they were picked up by defendant **RODRIGUEZ** or **CRUZ-VIDAL** to engage in prostitution in the Northern District of Florida.

2. Between on or about July 10, 2014, and on or about August 31, 2015, defendant **FLORES-ESPARZA** kept and maintained the premises at 1406 North 48th Avenue, Pensacola, Florida, for females to stay once they were picked up by defendant **FLORES-ESPARZA** to engage in prostitution at said premises and elsewhere throughout the Northern District of Florida and the State of Alabama.

3. On or about July 24, 2014, defendant **RODRIGUEZ** picked up a female at 604 Lantana Street, Panama City Beach, Florida, drove her to a Walmart where the female purchased several items, including condoms, and drove her to various addresses for the purpose of engaging in prostitution.

4. On or about August 28, 2014, defendant **RODRIGUEZ** transported a female to 604 Lantana Street, Panama City Beach, Florida, and subsequently transported the female to various locations for the purpose in engaging in prostitution.

5. On or about September 4, 2014, defendant **RODRIGUEZ** travelled to Dothan, Alabama, picked up a female, transported the female back to 604 Lantana Street, Panama City Beach, Florida, for the purpose of engaging in prostitution, drove her to a Walmart where the female purchased several items, including condoms, and drove her to various addresses for the purpose of engaging in prostitution.

6. On or about October 23, 2014, defendant **RODRIGUEZ** transported a female from Florida to the Spanish Fort, Alabama, area and returned to his residence in Santa Rosa Beach, Florida.

7. On or about November 14, 2014, defendant **CRUZ-VIDAL** picked up a female from 604 Lantana Street, Panama City Beach, Florida, and transported the female to defendant **RODRIGUEZ** for the purpose of engaging in prostitution.

8. On or about November 21, 2014, defendant **FLORES-ESPARZA** transported a female from Pensacola, Florida, to various locations in Robertsdale, Foley, and Gulf Shores, Alabama, to engage in prostitution, and later returned with the female to Pensacola, Florida.

9. On or about January 8, 2015, defendant **FLORES-ESPARZA** travelled to Mobile, Alabama, from his residence in Pensacola, Florida, picked up a female, and transported the female to his residence for the purpose of the female engaging in prostitution.

10. On or about January 11, 2015, defendant **FLORES-ESPARZA** transported a female from his residence in Pensacola, Florida, to an address in Pensacola, Florida, for the purpose of engaging in prostitution, after which defendant **FLORES-**

ESPARZA transported the female and dropped her off in Mobile, Alabama.

11. On or about February 13, 2015, defendant **FLORES-ESPARZA** met defendant **RODRIGUEZ** in Gulf Breeze, Florida, and transferred a female and her luggage to defendant **RODRIGUEZ**, who transported the female to 604 Lantana Street, Panama City Beach, Florida, for the purpose of engaging in prostitution.

12. On or about February 15, 2015, defendant **RODRIGUEZ** picked up a female at 604 Lantana Street, Panama City Beach, Florida, drove her to various addresses for the purpose of engaging in prostitution, and drove her to a Walmart where the female purchased several items, including condoms.

13. On or about February 15, 2015, defendant **RODRIGUEZ** transported a female from Florida to Dothan, Alabama, and transferred the female to defendant **PRUDENCIO**.

14. On or about February 26, 2015, defendant **FLORES-ESPARZA** met defendant **RODRIGUEZ** in Gulf Breeze, Florida, and transferred a female and her luggage to defendant **RODRIGUEZ** for the purpose of engaging in prostitution.

15. On or about March 5, 2015, defendant **FLORES-ESPARZA** met defendant **RODRIGUEZ** in Gulf Breeze, Florida, and transferred a female and her luggage to defendant **RODRIGUEZ** for the purpose in engaging in prostitution.

16. On or about March 21, 2015, defendant **CRUZ-VIDAL** picked up a female from 604 Lantana Street, Panama City Beach, Florida, and transported the female to defendant **RODRIGUEZ** for the purpose of engaging in prostitution.

17. On or about April 10, 2015, defendant **CRUZ-VIDAL** picked up a female from 604 Lantana Street, Panama City Beach, Florida, and transported the female to defendant **RODRIGUEZ** for the purpose of engaging in prostitution.

18. On or about May 9, 2015, defendant **RODRIGUEZ** contacted a female who he was keeping at 604 Lantana Street, Panama City Beach, Florida, and told her he would be there in 10 minutes to pick her up and she needed to wear a dress or skirt so that she would look sensual.

19. On or about May 9, 2015, defendant **RODRIGUEZ** was contacted by a customer who asked if there was any "meat," to which defendant **RODRIGUEZ** replied affirmatively and asked what time the customer wanted the female.

20. On or about May 9, 2015, defendant **RODRIGUEZ** was contacted by a customer who asked if there was a girl for the week, to which defendant **RODRIGUEZ** replied there was a girl, she was not a young one, was not bad, and worked well.

21. On or about May 9, 2015, defendant **RODRIGUEZ** was contacted by a customer who asked if the girl was "hot," to which defendant **RODRIGUEZ** replied she was "hot," and the customer then asked defendant **RODRIGUEZ** to reserve "three shots" with the female for him.

22. On or about May 12, 2015, defendants **RODRIGUEZ** and **FLORES-ESPARZA** agreed that a female who had been engaging in prostitution for defendant **FLORES-ESPARZA** would be transferred to defendant **RODRIGUEZ**, and that defendant **FLORES-ESPARZA** would take her to the Greyhound bus station in Pensacola and get her a ticket to travel to Panama City where defendant **RODRIGUEZ**

would pick her up and have her engage in prostitution. When asked by defendant **RODRIGUEZ** if the female does good work, defendant **FLORES-ESPARZA** replied affirmatively and told defendant **RODRIGUEZ** that he should "try her out."

23. On or about May 18, 2015, defendant **CRUZ-VIDAL** transported the female who had engaged in prostitution for defendant **RODRIGUEZ** from 604 Lantana Street, Panama City Beach, Florida, to the Greyhound bus station in Panama City and purchased a ticket for her to travel to New York.

24. On or about May 21, 2015, defendant **FLORES-ESPARZA** told defendant **RODRIGUEZ** he was bringing a female back from New Orleans and would meet defendant **RODRIGUEZ** at the usual place to transfer the female to defendant **RODRIGUEZ**.

25. On or about May 21, 2015, defendant **FLORES-ESPARZA** received two females who were delivered to his residence, one of whom defendant **FLORES-ESPARZA** planned to deliver to defendant **RODRIGUEZ** to engage in prostitution.

26. On or about May 22, 2015, defendant **FLORES-ESPARZA** transported one of the females referenced in the preceding overt act to Navarre, Florida, and transferred the female to defendant **RODRIGUEZ**.

27. On or about May 23, 2015, defendant **CRUZ** asked defendant **RODRIGUEZ** how many customers he handled, and defendant **RODRIGUEZ** told her "26."

28. On or about May 24, 2015, defendant **RODRIGUEZ** transported the female to Gulf Breeze, Florida, where he transferred the female to defendant **FLORES-**

ESPARZA.

29. On or about May 28, 2015, defendant **RODRIGUEZ** caused a female to travel from Louisiana to Florida to engage in prostitution for defendant **RODRIGUEZ**.

30. On or about May 28, 2015, defendant **TRUJILLO-SANTIZ** was told by defendant **RODRIGUEZ** to get the room ready at 604 Lantana Street, Panama City Beach, Florida, for the female referenced in the overt act above.

31. On or about May 29, 2015, defendant **RODRIGUEZ**, when asked by a female how many condoms she would need, told the female 30 condoms would be enough.

32. On or about May 29, 2015, defendant **PRUDENCIO** contacted defendant **FLORES-ESPARZA** and advised that the female currently prostituting for defendant **PRUDENCIO** was "new," "good," "young," and "new meat," and offered the female to defendant **FLORES-ESPARZA** to use in his prostitution activity.

33. On or about May 30, 2015, defendant **RODRIGUEZ** agreed to bring additional condoms to a residence where a female was engaging in prostitution, as the female called defendant **RODRIGUEZ** stating that she needed more condoms and the remainder of the condoms were in defendant **RODRIGUEZ'S** car.

34. On or about May 30, 2015, defendant **PRUDENCIO** contacted defendant **RODRIGUEZ** and asked him if he needed some "meat" for next week, as the "meat" he had in Montgomery, Alabama, was very good. Defendants **RODRIGUEZ** and **PRUDENCIO** agreed to meet in Dothan, Alabama, to transfer a female to defendant **RODRIGUEZ**.

35. On or about May 30, 2015, defendant **FLORES-ESPARZA** advised a customer that the female defendant **FLORES-ESPARZA** was prostituting was “real sexy,” “hot,” and cost \$30.

36. On or about May 31, 2015, defendant **RODRIGUEZ** discussed with another individual the 80,000 pesos (approximately \$5,555) that defendant **RODRIGUEZ** had sent to Mexico.

37. On or about June 4, 2015, defendant **RODRIGUEZ** travelled from Panama City, Florida, to Dothan, Alabama, and met defendant **CORVERA** who transferred a female to defendant **RODRIGUEZ** for use as a prostitute, and defendant **RODRIGUEZ** transported the female to 604 Lantana Street, Panama City Beach, Florida.

38. On or about June 6, 2015, defendant **FLORES-ESPARZA** contacted defendant **PRUDENCIO** and asked if there was anyone coming down from Atlanta to pick-up a female for **FLORES-ESPARZA**. Defendant **PRUDENCIO** agreed to check with defendant **JUAREZ-JUAREZ** who would probably agree to come halfway and meet defendant **FLORES-ESPARZA**.

39. On or about June 6, 2015, defendants **FLORES-ESPARZA** and **JUAREZ-JUAREZ** agreed to meet at the border of Alabama and Georgia where defendant **JUAREZ-JUAREZ** would deliver a female to defendant **FLORES-ESPARZA** in the next day or so.

40. On or about June 6, 2015, defendant **RODRIGUEZ** and **FLORES-ESPARZA** discussed their prostitution business and agreed that because they could not

make a sufficient profit charging \$30 for 15 minutes with the females, they should raise the price to \$40, as they are the ones assuming all the risks. Defendant **FLORES-ESPARZA** stated that he was going to talk to defendant **PRUDENCIO** about increasing the price.

41. On or about June 6, 2015, defendant **FLORES-ESPARZA** contacted defendant **PRUDENCIO** and discussed raising the price for the prostitution activity from \$30 to \$40, to which defendant **PRUDENCIO** agreed.

42. On or about June 7, 2015, defendant **RODRIGUEZ** transported a female to Dothan, Alabama, and transferred the female to defendant **CORVERA**, who transported the female to defendant **PRUDENCIO**.

43. On or about June 8, 2015, defendant **FLORES-ESPARZA** travelled from Pensacola, Florida, to Georgia and met defendant **JUAREZ-JUAREZ**, who transferred a female to defendant **FLORES-ESPARZA** for use as a prostitute, and defendant **FLORES-ESPARZA** transported the female back to his residence in Pensacola, Florida.

44. On or about June 8, 2015, defendant **RODRIGUEZ** transferred approximately \$1,500 (22,692 pesos) via two wires to Mexico, using a fictitious sender name.

45. On or about June 11, 2015, and on or about June 14, 2015, defendants **RODRIGUEZ** and **TRUJILLO-SANTIZ** harbored, kept, and maintained a female alien at 604 Lantana Street, Panama City, Beach, Florida, for the purpose of prostitution.

46. On or about June 15, 2015, defendant **CRUZ-VIDAL** transferred approximately \$310 (4,446 pesos) via wire to Mexico, using a fictitious name as the

sender, and provided this information and the transfer code to defendant **RODRIGUEZ** who telephoned the recipient in Mexico with the wire details.

47. On or about June 16, 2015, defendant **FLORES-ESPARZA** engaged in a discussion with a female from Costa Rica, who agreed to work for defendant **FLORES-ESPARZA** during the week of July 27, 2015, after she finished working as a prostitute for defendant **RODRIGUEZ**.

48. On or about June 22, 2015, defendant **CRUZ-VIDAL** transferred approximately \$426 (6,140 pesos) via wire to Mexico, using a fictitious name as the sender, and provided this information and the transfer code to defendant **RODRIGUEZ**, who telephoned the recipient in Mexico with the wire details.

49. On or about June 24, 2015, defendant **FLORES-ESPARZA** arranged with defendant **TOBON** to provide defendant **FLORES-ESPARZA** with a female on June 28, 2015, to engage in prostitution for defendant **FLORES-ESPARZA** during the week of June 29, 2015.

50. On or about June 28, 2015, defendant **FLORES-ESPARZA** travelled to Starkville, Mississippi, picked up a female from defendant **TOBON**, and transported the female to his Pensacola, Florida, residence.

51. On or about June 28, 2015, defendant **PRUDENCIO** called defendant **FLORES-ESPARZA** and asked defendant **FLORES-ESPARZA** if he had a female who could be transferred to defendant **GONZALEZ-LIRA** for purposes of prostitution. Defendant **FLORES-ESPARZA** agreed to attempt to locate a female for defendant **GONZALEZ-LIRA**.

52. On or about June 29, 2015, defendant **FLORES-ESPARZA** electronically transmitted a photograph to a customer. The photograph was of a female who was available for prostitution.

53. On or about June 30, 2015, defendant **CRUZ-VIDAL** transferred approximately \$1,425 (22,874 pesos) via two wires to Mexico, using a fictitious name as the sender, and provided this information and the transfer codes to defendant **RODRIGUEZ**, who telephoned the recipients in Mexico with the wire details.

54. On or about July 1, 2015, defendant **RODRIGUEZ** told defendant **CRUZ-VIDAL** that a female had unexpectedly arrived early, and he had to call defendant **TRUJILLO-SANTIZ** to see how much more they will be charged for the female to stay at the rental house.

55. On or about July 1, 2015, defendant **PRUDENCIO** called defendant **FLORES-ESPARZA** and asked if defendant **FLORES-ESPARZA** had a female defendant **PRUDENCIO** could use during the next week.

56. On or about July 6, 2015, defendant **GONZALEZ-LIRA** provided the name and telephone number of a female to defendant **FLORES-ESPARZA** to use in his prostitution business.

57. On or about July 6, 2015, defendant **GONZALEZ-LIRA** contacted defendant **FLORES-ESPARZA** and discussed a female defendant **FLORES-ESPARZA** could use for prostitution.

58. On or about July 15, 2015, defendants **FLORES-ESPARZA** and **GONZALEZ-LIRA** discussed obtaining and transporting females from Atlanta to

Mississippi and Florida to engage in prostitution.

59. On or about July 18, 2015, defendant **PRUDENCIO** arranged for a female to travel from Houston, Texas, to Montgomery, Alabama, on Monday, July 20, 2015, to engage in prostitution for defendant **PRUDENCIO**.

60. On or about July 19, 2015, defendant **PRUDENCIO** provided the telephone number of defendant **RODRIGUEZ** to a female so she could contact defendant **RODRIGUEZ** regarding working as a prostitute.

61. On or about July 19, 2015, defendant **GONZALEZ-LIRA** contacted defendant **FLORES-ESPARZA**, provided a name and telephone number of a female from El Salvador, and advised defendant **FLORES-ESPARZA** that she would call him.

62. On or about July 19, 2015, defendant **FLORES-ESPARZA** made arrangements with a female in New Orleans, Louisiana, to travel to his residence in Pensacola to work as a prostitute for defendants **FLORES-ESPARZA** and **RODRIGUEZ**.

63. On or about July 20, 2015, defendant **FLORES-ESPARZA** caused a female to travel from Louisiana to Florida to engage in prostitution in Florida.

64. On or about July 20, 2015, defendant **PRUDENCIO** spoke to a female who advised she worked for defendant **FLORES-ESPARZA** the previous week, because the female defendant **TOBON** sent to defendant **FLORES-ESPARZA** never arrived.

65. On or about July 21, 2015, defendant **FLORES-ESPARZA** transferred approximately \$1,000 via wire to Honduras and provided this information and the transfer code to an individual in Honduras.

66. On or about July 21, 2015, defendant **PRUDENCIO** caused a female to travel from New Orleans, Louisiana, to Montgomery, Alabama, and picked her up at a Greyhound bus station and utilized her as prostitute.

67. On or about July 22, 2015, defendant **GONZALEZ-LIRA** contacted defendant **PRUDENCIO** and asked if defendant **PRUDENCIO** needed a female for the following week.

68. On or about July 23, 2015, defendant **PRUDENCIO** referred a female to defendant **FLORES-ESPARZA** for work as a prostitute.

69. On or about July 25, 2015, defendant **FLORES-ESPARZA** electronically transmitted a photograph to a customer. The photograph was of a female who was available for prostitution.

70. On or about July 27, 2015, defendant **GONZALEZ-LIRA** contacted defendant **PRUDENCIO** and asked defendant **PRUDENCIO** if he had a female available to work. Defendant **PRUDENCIO** provided defendant **GONZALEZ-LIRA** with the name and telephone number of a female in Atlanta, Georgia, who called defendant **PRUDENCIO** earlier in the day looking for work, and defendant **PRUDENCIO** advised defendant **GONZALEZ-LIRA** he would have to travel to Atlanta to obtain the female.

71. On or about July 29, 2015, defendant **PRUDENCIO** travelled to the Alabama/Georgia border, picked up a female, and brought her to Montgomery, Alabama, for the purpose of engaging in prostitution.

72. On or about July 29, 2015, defendant **GONZALEZ-LIRA** told defendant **PRUDENCIO** that the female defendant **GONZALEZ-LIRA** provided to defendant **FLORES-ESPARZA** for the past week went to work for defendant **RODRIGUEZ** and then would work for defendant **GONZALEZ-LIRA** next week.

73. Between on or about July 30, 2015, and on or about August 1, 2015, defendants **RODRIGUEZ** and **TRUJILLO-SANTIZ** used a female to engage in prostitution and kept the female at 604 Lantana Street, Panama City Beach, Florida.

74. On or about August 2, 2015, in response to a question of how it went the day before, defendant **PRUDENCIO** stated that he “did well yesterday” and “did 26 tickets,” making about \$360.

75. On or about August 5, 2015, defendant **PRUDENCIO** caused a female to travel from Houston, Texas, to Montgomery, Alabama, and picked her up at a Greyhound bus station for the purpose of engaging in prostitution.

76. On or about August 10, 2015, defendant **PRUDENCIO** arranged with a female to travel from Houston, Texas, to Pensacola, Florida, to engage in prostitution for defendant **RODRIGUEZ** between August 13-16, 2015, and then to have defendant **RODRIGUEZ** bring her to defendant **PRUDENCIO** in Alabama on August 16, 2015, so she could engage in prostitution for defendant **PRUDENCIO**.

77. On or about August 12, 2015, defendant **PRUDENCIO** caused a female to travel from Atlanta, Georgia, to Montgomery, Alabama, to engage in prostitution for defendant **PRUDENCIO**.

78. On or about August 12, 2015, defendant **PRUDENCIO** told a female travelling to Montgomery, Alabama, to stop and purchase condoms before she arrived at defendant **PRUDENCIO**'s residence to engage in prostitution.

79. On or about August 14, 2015, defendant **PRUDENCIO** arranged with a female to engage in prostitution with a friend of defendant **PRUDENCIO**, and arranged for the friend to pick her up after August 17, 2015, and for the friend to call her to make specific arrangements.

80. On or about August 16, 2015, defendant **RODRIGUEZ** transported a female from Panama City Beach, Florida, to Dothan, Alabama, and delivered her to defendant **PRUDENCIO**, who took her to Montgomery, Alabama, to engage in prostitution.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

On or about May 8, 2015, in the Northern District of Florida and elsewhere, the defendant,

EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"

did knowingly persuade, induce, entice, and coerce an individual, namely, M.A., to travel in interstate commerce to engage in prostitution.

In violation of Title 18, United States Code, Sections 2422 and 2.

COUNT THREE

On or about May 14, 2015, in the Northern District of Florida and elsewhere, the defendants,

EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"
and
ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"
a/k/a "Antonio Vargas Flores,"

did knowingly persuade, induce, entice, and coerce an individual known as "Lucia," to travel in interstate commerce to engage in prostitution.

In violation of Title 18, United States Code, Sections 2422 and 2.

COUNT FOUR

On or about May 22, 2015, in the Northern District of Florida and elsewhere, the defendants,

EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"
and
ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"
a/k/a "Antonio Vargas Flores,"

did knowingly persuade, induce, entice, and coerce an individual known as "More," to travel in interstate commerce to engage in prostitution.

In violation of Title 18, United States Code, Sections 2422 and 2.

COUNT FIVE

On or about May 25, 2015, in the Northern District of Florida and elsewhere, the defendant,

**ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"
a/k/a "Antonio Vargas Flores,"**

did knowingly persuade, induce, entice, and coerce a female to travel in interstate commerce to engage in prostitution.

In violation of Title 18, United States Code, Sections 2422 and 2.

COUNT SIX

On or about May 28, 2015, in the Northern District of Florida and elsewhere, the defendant,

**EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"**

did knowingly persuade, induce, entice, and coerce an individual known as "Abril," to travel in interstate commerce to engage in prostitution.

In violation of Title 18, United States Code, Sections 2422 and 2.

COUNT SEVEN

On or about June 1, 2015, in the Northern District of Florida and elsewhere, the defendant,

**ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"
a/k/a "Antonio Vargas Flores,"**

did knowingly persuade, induce, entice, and coerce an individual known as "Vicky," to travel in interstate commerce to engage in prostitution.

In violation of Title 18, United States Code, Sections 2422 and 2.

COUNT EIGHT

Between on or about June 1, 2015, and on or about June 8, 2015, in the Northern District of Florida and elsewhere, the defendant,

ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"
a/k/a "Antonio Vargas Flores,"

did knowingly keep, maintain, control, support, employ, and harbor in any house and other place, that is, at 1406 North 48th Avenue, Pensacola, Florida, for the purpose of prostitution and any other immoral purpose, an alien, known as "Vicky," in pursuance of the importation of said alien into the United States.

In violation of Title 8, United States Code, Section 1328 and Title 18, United States Code, Section 2.

COUNT NINE

On or about June 4, 2015, in the Northern District of Florida and elsewhere, the defendants,

EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"
JOSE JUAN RUIZ PRUDENCIO,
a/k/a "Jose Juan Ruiz-Prudencio,"
a/k/a "Jose Ruiz Prudencio,"
a/k/a "Juan Ruiz Prudencio,"
a/k/a "Jose Ruiz,"

**a/k/a "Juan Ruiz,"
a/k/a "Flaco,"
a/k/a "El Flaco,"
and
EMERSON CORVERA,**

did knowingly transport a female in interstate commerce, with the intent that the female engage in prostitution.

In violation of Title 18, United States Code, Sections 2421 and 2.

COUNT TEN

On or about June 8, 2015 in the Northern District of Florida and elsewhere, the defendant,

**EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the movement of funds by wire to outside the United States, which involved the proceeds of a specified unlawful activity, that is, the transportation in interstate commerce of individuals with intent that the individuals engage in prostitution, knowing that the financial transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction the defendant knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT ELEVEN

On or about June 8, 2015, in the Northern District of Florida and elsewhere, the defendants,

ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"
a/k/a "Antonio Vargas Flores,"
and
LAZARO JUAREZ-JUAREZ,
a/k/a "Catracho,"

did knowingly transport an individual known as "Andrea," in interstate commerce, with the intent that "Andrea" engage in prostitution.

In violation of Title 18, United States Code, Sections 2421 and 2.

COUNT TWELVE

On or about June 11, 2015, in the Northern District of Florida and elsewhere, the defendant,

EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a Edgar "Panama,"
a/k/a "Edgar,"

did knowingly transport an individual, namely, M.S., in interstate commerce, with the intent that M.S. engage in prostitution.

In violation of Title 18, United States Code, Sections 2421 and 2.

COUNT THIRTEEN

Between on or about June 11, 2015, and on or about June 14, 2015, in the Northern District of Florida and elsewhere, the defendants,

**EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"
and
JOSE ALVARO TRUJILLO-SANTIZ,**

did knowingly keep, maintain, control, support, employ, and harbor in any house and other place, that is, at 604 Lantana Street, Panama City Beach, Florida, for the purpose of prostitution and any other immoral purpose, an alien, M.S., in pursuance of the importation of said alien into the United States.

In violation of Title 8, United States Code, Sections 1328 and 2.

COUNT FOURTEEN

On or about June 15, 2015, in the Northern District of Florida and elsewhere, the defendant,

**ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"
a/k/a "Antonio Vargas Flores,"**

did knowingly transport a female in interstate commerce, with the intent that the female engage in prostitution.

In violation of Title 18, United States Code, Sections 2421 and 2.

COUNT FIFTEEN

On or about June 15, 2015, in the Northern District of Florida and elsewhere, the defendants,

**EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"**

and
ROSA MIRTHA CRUZ-VIDAL,
a/k/a "Rosa Cruz,"

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the movement of funds by wire to outside the United States, which involved the proceeds of a specified unlawful activity, that is, the transportation in interstate commerce of individuals with intent that the individuals engage in prostitution, knowing that the financial transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction the defendants knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT SIXTEEN

On or about June 18, 2015, in the Northern District of Florida and elsewhere, the defendant,

EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"

did knowingly persuade, induce, entice, and coerce an individual known as "Monica," to travel in interstate commerce to engage in prostitution.

In violation of Title 18, United States Code, Sections 2422 and 2.

COUNT SEVENTEEN

On or about June 22, 2015, in the Northern District of Florida and elsewhere, the defendants,

EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"
and
ROSA MIRTHA CRUZ-VIDAL,
a/k/a "Rosa Cruz,"

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the movement of funds by wire to outside the United States, which involved the proceeds of a specified unlawful activity, that is, the transportation in interstate commerce of individuals with intent that the individuals engage in prostitution, knowing that the financial transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction the defendants knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT EIGHTEEN

On or about June 25, 2015, in the Northern District of Florida and elsewhere, the defendants,

EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"

and
JOSE JUAN RUIZ PRUDENCIO,
a/k/a "Jose Juan Ruiz-Prudencio,"
a/k/a "Jose Ruiz Prudencio,"
a/k/a "Juan Ruiz Prudencio,"
a/k/a "Jose Ruiz,"
a/k/a "Juan Ruiz,"
a/k/a "Flaco,"
a/k/a "El Flaco,"

did knowingly persuade, induce, entice, and coerce an individual known as "Liz," to travel in interstate commerce to engage in prostitution.

In violation of Title 18, United States Code, Sections 2422 and 2.

COUNT NINETEEN

On or about June 28, 2015, in the Northern District of Florida and elsewhere, the defendants,

ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"
a/k/a "Antonio Vargas Flores,"
and
ROMON TOBON,
a/k/a "Roman Toban,"
a/k/a "Tobon Roman,"
a/k/a "Kalula,"

did knowingly transport an individual, namely, "Azul," in interstate commerce, with the intent that "Azul" engage in prostitution.

In violation of Title 18, United States Code, Sections 2421 and 2.

COUNT TWENTY

On or about June 28, 2015, in the Northern District of Florida, and elsewhere, the defendant,

**ROMON TOBON,
a/k/a "Roman Toban,"
a/k/a "Tobon Roman,"
a/k/a "Kalula,"**

an alien who had previously been excluded, deported, and removed from the United States on or about May 16, 2012, and previously on or about November 14, 2011, was found to be unlawfully in the United States, having not obtained the consent of the Secretary of the Department of Homeland Security to reapply for admission to the United States.

In violation of Title 8, United States Code, Sections 1326(a) and 1326(b)(1).

COUNT TWENTY-ONE

On or about June 30, 2015, in the Northern District of Florida and elsewhere, the defendants,

**EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"
and
ROSA MIRTHA CRUZ-VIDAL,
a/k/a "Rosa Cruz,"**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit, the movement of funds by wire to outside the United States, which involved the proceeds of a specified unlawful activity, that is, the transportation in interstate commerce of individuals with intent that the individuals engage in prostitution, knowing that the financial transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to

conduct such financial transaction the defendants knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT TWENTY-TWO

On or about July 1, 2015, in the Northern District of Florida and elsewhere, the defendant,

EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"

did knowingly persuade, induce, entice, and coerce an individual, namely C.S., to travel in interstate commerce to engage in prostitution.

In violation of Title 18, United States Code, Sections 2422 and 2.

COUNT TWENTY-THREE

Between on or about July 1, 2015, and on or about July 5, 2015, in the Northern District of Florida and elsewhere, the defendants,

EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"
and
JOSE ALVARO TRUJILLO-SANTIZ,

did knowingly keep, maintain, control, support, employ, and harbor in any house and other place, that is, 604 Lantana Street, Panama City Beach, Florida, for the purpose of prostitution and any other immoral purpose, an alien, C.S., in pursuance of the importation of said alien into the United States.

In violation of Title 8, United States Code, Sections 1328 and 2.

COUNT TWENTY-FOUR

On or about July 13, 2015, in the Northern District of Florida and elsewhere, the defendant,

**ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"
a/k/a "Antonio Vargas Flores,"**

did knowingly persuade, induce, entice, and coerce an individual known as "Vicky," to travel in interstate commerce to engage in prostitution.

In violation of Title 18, United States Code, Sections 2422 and 2.

COUNT TWENTY-FIVE

Between on or about July 13, 2015, and on or about July 20, 2015, in the Northern District of Florida, the defendant,

**ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"
a/k/a "Antonio Vargas Flores,"**

did knowingly keep, maintain, control, support, employ, and harbor in any house and other place, that is, 1406 North 48th Avenue, Pensacola, Florida, for the purpose of prostitution and any other immoral purpose, an alien, known as "Vicky," in pursuance of the importation of said alien into the United States.

In violation of Title 8, United States Code, Sections 1328 and 2.

COUNT TWENTY-SIX

On or about July 20, 2015, in the Northern District of Florida and elsewhere, the defendants,

**ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"
a/k/a "Antonio Vargas Flores,"
and
MAURO GONZALEZ-LIRA,
a/k/a "Chino,"**

did knowingly persuade, induce, entice, and coerce an individual, namely, A.P., to travel in interstate commerce to engage in prostitution.

In violation of Title 18, United States Code, Sections 2422 and 2.

COUNT TWENTY-SEVEN

Between on or about July 20, 2015, and on or about July 30, 2015, in the Northern District of Florida, the defendant,

**ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"
a/k/a "Antonio Vargas Flores,"**

did knowingly keep, maintain, control, support, employ, and harbor in any house and other place, that is, 1406 North 48th Avenue, Pensacola, Florida, for the purpose of prostitution and any other immoral purpose, an alien, A.P., in pursuance of the importation of said alien into the United States.

In violation of Title 8, United States Code, Sections 1328 and 2.

COUNT TWENTY-EIGHT

On or about July 30, 2015, in the Northern District of Florida and elsewhere, the defendant,

**EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"**

did knowingly persuade, induce, entice, and coerce an individual, namely, A.P., to travel in interstate commerce to engage in prostitution.

In violation of Title 18, United States Code, Sections 2422 and 2.

COUNT TWENTY-NINE

Between on or about July 30, 2015, and on or about August 1, 2015, in the Northern District of Florida, the defendants,

**EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"
and
JOSE ALVARO TRUJILLO-SANTIZ,**

did knowingly keep, maintain, control, support, employ, and harbor in any house and other place, that is, 604 Lantana Street, Panama City Beach, Florida, for the purpose of prostitution and any other immoral purpose, an alien, A.P., in pursuance of the importation of said alien into the United States.

In violation of Title 8, United States Code, Sections 1328 and 2.

COUNT THIRTY

On or about July 27, 2015, in the Northern District of Florida and elsewhere, the defendant,

**ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"
a/k/a "Antonio Vargas Flores,"**

did knowingly persuade, induce, entice, and coerce a female to travel in interstate commerce to engage in prostitution.

In violation of Title 18, United States Code, Sections 2422 and 2.

COUNT THIRTY-ONE

On or about August 13, 2015, in the Northern District of Florida and elsewhere,
the defendants,

EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"
and
JOSE JUAN RUIZ PRUDENCIO,
a/k/a "Jose Juan Ruiz-Prudencio,"
a/k/a "Jose Ruiz Prudencio,"
a/k/a "Juan Ruiz Prudencio,"
a/k/a "Jose Ruiz,"
a/k/a "Juan Ruiz,"
a/k/a "Flaco,"
a/k/a "El Flaco,"

did knowingly transport an individual, known as "Anna," in interstate commerce, with
the intent that the female known as "Anna" engage in prostitution.

In violation of Title 18, United States Code, Sections 2421 and 2.

COUNT THIRTY-TWO

On or about August 16, 2015, in the Northern District of Florida and elsewhere,
the defendants,

EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"
and
JOSE JUAN RUIZ PRUDENCIO,

**a/k/a "Jose Juan Ruiz-Prudencio,"
a/k/a "Jose Ruiz Prudencio,"
a/k/a "Juan Ruiz Prudencio,"
a/k/a "Jose Ruiz,"
a/k/a "Juan Ruiz,"
a/k/a "Flaco,"
a/k/a "El Flaco,"**

did knowingly transport an individual known as "Anna," in interstate commerce, with the intent that the female known as "Anna" engage in prostitution.

In violation of Title 18, United States Code, Sections 2421 and 2.

CRIMINAL FORFEITURE

The allegations in Counts One through Thirty-Two of this Indictment are realleged and incorporated herein for the purpose of alleging forfeiture to the United States of America.

From their engagement in the violations alleged in Counts One through Thirty-Two of this Indictment, the defendants,

**EDEGARDO OSORNO RODRIGUEZ,
a/k/a "Edgar Rodriguez,"
a/k/a "Edgar Panama,"
a/k/a "Edgar,"
ANTONIO FLORES-ESPARZA,
a/k/a "Giovani Rodriguez-Ruvulcaba,"
a/k/a "Antonio Flores,"
a/k/a "Antonio Vargas Flores"
JOSE JUAN RUIZ PRUDENCIO,
a/k/a "Jose Juan Ruiz-Prudencio,"
a/k/a "Jose Ruiz Prudencio,"
a/k/a "Juan Ruiz Prudencio,"
a/k/a "Jose Ruiz,"
a/k/a "Juan Ruiz,"
a/k/a "Flaco,"
a/k/a "El Flaco,"
JOSE ALVARO TRUJILLO-SANTIZ-SANTIZ,
ROSA MIRTHA CRUZ VIDAL,**

**a/k/a "Rosa Cruz,"
MAURO GONZALEZ-LIRA,
a/k/a "Chino,"
ROMON TOBON,
a/k/a "Roman Toban,"
a/k/a "Tobon Roman,"
a/k/a "Kalula,"
LAZARO JUAREZ-JUAREZ,
a/k/a "Catracho,"
and
EMERSON CORVERA**

shall forfeit to the United States of America:

(A) Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 8, United States Code, Section 1328, any and all of the defendants' right, title, and interest in any property, real and personal, constituting and derived from proceeds traceable to such offense;

(B) Pursuant 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1956, any and all of the defendants' right, title, and interest in any property, real and personal, involved in such offense, and any property traceable to such property; and

(C) Pursuant to Title 18, United States Code, Section 2428, upon conviction of an offense in violation of Title 18, United States Code, Sections 2421 and 2422, any and all of the defendants' right, title, and interest in any property, real and personal, that was used or intended to be used to commit and to facilitate the commission of the offense and any property, real and personal, constituting and derived from any proceeds obtained, directly and indirectly, as a result of such offense;

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

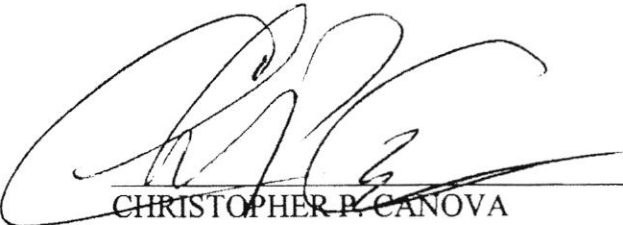
- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third party;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be divided without difficulty,

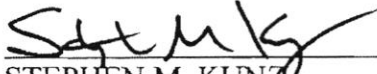
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

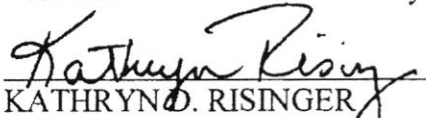
A TRUE BILL:


FOREPERSON

9-15-15
DATE


CHRISTOPHER P. CANOVA
Acting United States Attorney


STEPHEN M. KUNZ
Assistant United States Attorney


KATHRYN D. RISINGER
Assistant United States Attorney