
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Michael A. Hammer, U.S.M.J.
v. :
 :
 :
 : Mag. No. 18-4051
GABRIELLA COLON, and :
RICHARD ORTIZ, : **CRIMINAL COMPLAINT**
a/k/a "Ace"


I, Michael Scimeca, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:


SEE ATTACHMENT B

Continued on the attached page and made a part hereof:


Special Agent Michael Scimeca
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
April 5, 2018 in Newark, New Jersey

HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

Count One
(Sex Trafficking of a Child)

From in or around January 2018, through on or about February 2, 2018, in Middlesex, Bergen, and Essex counties, in the District of New Jersey and elsewhere, defendants

GABRIELLA COLON, and
RICHARD ORTIZ,
a/k/a "Ace,"

did knowingly, in and affecting interstate commerce, and after having had a reasonable opportunity to observe Victim-1, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, and solicit by any means, Victim-1, knowing and in reckless disregard of the fact that Victim-1 had not attained the age of 18 years and that Victim-1 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591 (a)(1), (b)(2), & (c), and Title 18, United States Code, Section 2.

Count Two
(Benefitting Financially From Sex Trafficking of a Child)

From in or around January 2018, through on or about February 2, 2018, in Middlesex, Bergen, and Essex counties, in the District of New Jersey and elsewhere, defendants

GABRIELLA COLON, and
RICHARD ORTIZ,
a/k/a "Ace,"

did knowingly, in and affecting interstate commerce, and after having had a reasonable opportunity to observe Victim-1, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, and solicit by any means, Victim-1, and did benefit financially and by receiving anything of value, from participation in a venture which was engaged in any such act, knowing and in reckless disregard of the fact that Victim-1 had not attained the age of 18 years and that Victim-1 would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591 (a)(2), (b)(2), & (c), and Title 18, United States Code, Section 2.

Count Three
(Conspiracy to Transport a Minor to Engage in Prostitution)

From in or around January 2018, through on or about February 2, 2018, in Middlesex, Bergen, and Essex counties, in the District of New Jersey and elsewhere, defendants

GABRIELLA COLON, and
RICHARD ORTIZ,
a/k/a "Ace,"

did knowingly conspire and agree with each other to transport an individual who had not attained the age of 18 years, namely Victim-1, in interstate commerce, with the intent that Victim-1 engage in prostitution, and in any sexual activity for which any person could be charged with a criminal offense, contrary to Title 18, United States Code, Section 2423(a).

In violation of Title 18, United States Code, Section 2423(e).

ATTACHMENT B

I, Michael Scimeca, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Beginning in or around January 2018, defendant Gabriella Colon ("COLON") and defendant Richard Ortiz, a/k/a "Ace" ("ORTIZ") enticed Victim-1 to meet them in New York. Over the course of the ensuing month, ending on or about February 2, 2018, COLON and ORTIZ, on numerous occasions, transported Victim-1 from New York to hotels in various counties in New Jersey, where they forced Victim-1 to engage in commercial sex acts, so they could collect the money from the customers who patronized Victim-1.

2. In or around January 2018, COLON enticed Victim-1, who was COLON's friend, to come to New York to visit COLON. After Victim-1 traveled to New York to visit COLON, Victim-1 learned that COLON was prostituting herself to support herself and her boyfriend, ORTIZ. Shortly thereafter, COLON and ORTIZ transported Victim-1 to a hotel in New Jersey.

3. While at the hotel, COLON and ORTIZ forced Victim-1 to take sexually explicit photographs. COLON then took sexually explicit photographs, and at least one video, of Victim-1. COLON and/or ORTIZ then posted the photographs of Victim-1 on the website Backpage.com, and advertised the sexual services of Victim-1 (the "Advertisements").¹ In addition to sexually explicit photographs of Victim-1, the Advertisements contained telephone numbers belonging to COLON and/or ORTIZ for customers or "Johns" to call to arrange for "dates" with Victim-1.

4. Once the customers called the numbers listed in the Advertisements, COLON and ORTIZ set up "dates" for Victim-1. COLON and ORTIZ then forced Victim-1 to engage in commercial sex acts, namely prostitution, with various individuals at multiple hotels scattered throughout Middlesex, Bergen, and Essex counties, in the District of New Jersey. At each of these encounters, either COLON or ORTIZ collected all of the proceeds that the customers paid Victim-1 for the commercial sex acts. COLON and ORTIZ

¹ Backpage.com is a website that lets users post online advertisements, including advertisements for commercial sex acts.

used those proceeds to purchase a car – a Jaguar (the “Jaguar”). COLON and ORTIZ subsequently used that Jaguar to transport Victim-1 from New York to hotels in New Jersey to engage in additional commercial sex acts.

5. On or about February 16, 2018, after being advised of her Miranda rights, COLON, in a video-recorded interview, stated that she: (i) was friends with Victim-1; (ii) knew that Victim-1 had not attained the age of 18; (iii) took photographs, and one video, of Victim-1; (iv) posted those photographs and the video in online advertisements that advertised for commercial sex with Victim-1; (v) handled communications from customers for Victim-1; and (vi) along with ORTIZ transported Victim-1 from New York to various hotels in New Jersey.

6. Likewise, on or about February 16, 2018, after being advised of his Miranda rights, ORTIZ admitted that he and COLON transported Victim-1 across state lines. Ortiz also admitted that COLON and Victim-1 engaged in commercial sex acts.