
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Joseph A. Dickson
 :
 v. :
 : Mag. No. 19-6759
 JEAN NORIEGA :
 a/k/a "Poison," :
 JOHN OYOLA : **CRIMINAL COMPLAINT**
 a/k/a "Peachy," and :
 ENNA GONZALEZ :

I, Dustin Doyle, 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 Dustin Doyle
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
August 2, 2019 in Newark, New Jersey

HONORABLE JOSEPH A. DICKSON
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count One
(Conspiracy to Engage in Sex Trafficking)

From in or around 2016, through in or about December 2017 in Passaic County, in the District of New Jersey and elsewhere, defendants

JEAN NORIEGA,
a/k/a "Poison",
JOHN OYOLA,
a/k/a "Peachy," and
ENNA GONZALEZ

did knowingly and intentionally conspire and agree with each other to recruit, entice, harbor, transport, provide, obtain, and maintain one or more persons, in and effecting interstate commerce, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, and a combination of such means would be used to cause such person or persons to engage in one or more commercial sex acts, contrary to Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

In violation of Title 18, United States Code, Section 1594.

ATTACHMENT B

I, Dustin Doyle, am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since 2012. As such, I am involved in the investigation of human trafficking and other violations, such as corruption, complex financial crimes, narcotics, and civil rights investigations, in New Jersey. 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 relayed herein, they are relayed 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. Since April 2018, law enforcement has been investigating allegations that Jean Noriega, also known as “Poison,” his now-wife, Enna Gonzalez, and his son, John Oyola, also known as “Peachy,” were engaging in sex trafficking and other federal offenses. Law enforcement received reports that Noriega had been exploiting severely drug-dependent young women and using force, threats, and other means to coerce them to engage in commercial sex acts. After receiving the reports, law enforcement interviewed witnesses, including Victim-1, Victim-2, Victim-3, Victim-4, and Victim-5 (collectively, the “Victims”). Each of the Victims advised law enforcement that Noriega physically and mentally abused them, and that Noriega used controlled substances, violence, and threats of violence to coerce the Victims to engage in commercial sex acts.

2. During the investigation, law enforcement learned that, from as early as in or about 2016 and continuing through January 2018, Noriega maintained a residence located in Paterson, New Jersey (the “Paterson Residence”). Noriega transported several of the Victims from the Paterson Residence to hotels located in New York and New Jersey where the Victims engaged in commercial sex at Noriega’s direction and for his profit.

3. Noriega utilized various methods and means to coerce the Victims to engage in commercial sex acts. These methods and means included, without limitation, the following: providing the Victims with controlled substances and/or maintaining the Victims’ addictions; taking all of the money the Victims earned from engaging in commercial sex; and using violence and threats of violence to cause the Victims to continue engaging in commercial sex acts.

4. Noriega and Gonzalez placed advertisements on the website Backpage.com (“Backpage”) to advertise and promote the Victims’ commercial

sex acts in New York and New Jersey. The advertisements contained sexually explicit photographs of the Victims and telephone numbers associated with phones belonging to Noriega and/or other phones that Noriega provided to the Victims. Men seeking to engage in commercial sex acts called those numbers to arrange commercial sex acts with the Victims. At various points in time both Noriega and Gonzalez maintained control of the Backpage advertisements and the money generated from the commercial sex acts. Noriega also paid for the hotel rooms the Victims used for purposes of engaging in commercial sex.

5. Noriega further monitored the Victims while they engaged in commercial sex acts. More specifically, Noriega would reserve multiple hotel rooms, often immediately next to each other or close by one another to be in close proximity to the Victims and the proceeds from the commercial sex acts. Noriega also directed the Victims to call him during the commercial sex acts so that he could listen to the sex acts and financial transactions. Doing so ensured that Noriega maintained all of the proceeds from the commercial sex acts. With respect to Victim-1, Victim-2, Victim-3, and Victim-5, Noriega kept the entirety of the proceeds earned through the commercial sex acts.

6. Noriega further used controlled substances to exercise control over the Victims. Noriega recruited and enticed already drug-addicted young women, including the Victims, to stay at the Paterson Residence with the promise that he would provide them with more controlled substances. For example, Noriega encouraged and exacerbated the Victims' drug use and, in some cases, coerced them to use more severe narcotics. This allowed Noriega to pressure the Victims to continue to engage in commercial sex. Noriega would then require the Victims to engage in commercial sex acts in order to acquire more drugs to support their addictions and avoid the severe withdrawal symptoms.

7. Noriega also physically assaulted the Victims and otherwise intimidated them and created a climate of fear among the Victims. For example, on multiple occasions, Noriega assaulted Victim-5 and made the other Victims observe those assaults.

8. Gonzalez also helped maintain the climate of fear among the Victims by advising them that Noriega would beat them if they did not comply with Gonzalez's demands to engage in commercial sex acts on Noriega's behalf.

9. According to the Victims, Oyola assisted Noriega carry out his sex trafficking activities. For instance, Oyola drove the Victims to and from the hotels where Noriega required them to engage in commercial sex acts. The Victims also stated that Oyola would sometimes videotape Noriega beating the Victims or other women. For example, Noriega beat a woman with a belt until she was bleeding from her head. This assault occurred in the Paterson House in the presence of Victim-1, Victim-2, and Victim-3, and Oyola filmed the

assault. Oyola showed Victim-4 a video of Noriega assaulting the same woman. Victim-4 stated, in substance and in part, that the video made her feel afraid.

10. On August 9, 2017, Noriega was arrested at a hotel in New York for promoting prostitution and possession of a controlled substance. Subsequently, on October 30, 2018, Noriega pled guilty to promoting prostitution and criminal possession of a controlled substance, in violation of New York Public Laws 110.230.25.01 and 220.06.01. Noriega is currently serving a determinate two year term of imprisonment in New York for that conviction (the “New York Charge”).

11. During the investigation, law enforcement obtained Noriega’s recorded jail calls. Noriega’s jail calls confirmed what the Victims previously told law enforcement, i.e., that Noriega, Oyola and Gonzalez worked together to profit from the Victims’ sex trafficking activities.

Jail Calls Between Noriega and Oyola in Furtherance of the Conspiracy

12. In a recorded jail call on August 10, 2017, just one day after being arrested in New York, Noriega directed Oyola to coordinate with Gonzalez to take Victim-1 and Victim-4 to “work,” at a hotel in Connecticut to earn money for Noriega’s bail. Based on my training and experience, and information gathered during this investigation, to “work” means to engage in commercial sex acts.¹

13. In a recorded jail call on August 18, 2017, Oyola reported to Noriega the amount of money that Victim-1 and Victim-4 had earned from engaging in commercial sex at a hotel in New Jersey.

14. On August 18, 2017, Oyola called Noriega to report that Victim-1 and Victim-4 had left a hotel room without informing him. Noriega advised Oyola on how to find the women, including by searching local court websites and Backpage.com advertisements. On August 19, 2017, Oyola called Noriega to inform him that he was still looking for Victim-1 and Victim-4. Oyola informed Noriega that if he found Victim-1 and Victim-4 before they contacted him, he would beat them. He also informed Noriega that he planned to tell Victim-4’s probation officer that Victim-4 was using Backpage.com in order to punish her.

15. In a call recorded on August 20, 2017, Oyola informed Noriega that he had seen Victim-5 around Paterson. He reported that he beeped his horn at

¹Consensually recorded conversations referenced herein, including recordings of prison calls, took place primarily in English with some interwoven Spanish. The summaries of such recordings described in this Affidavit are based on preliminary transcriptions and translations of such conversations.

Victim-5 and she ran away. Two days later, Noriega provided Oyola with the following directions during a recorded call:

Tell [Victim-5] she better send some money over there before I get out. She better send something to ease the blows a little bit. But they still coming. That girl made me lose my spot. I don't need the same bitches; I can get new ones all the time. I ain't going to let her run around with my name on her. Tell her she has 48 hours left to send [Gonzalez] some money before the lion gets out.

At the end of the call, Noriega reminded Oyola to instruct Victim-5 to give money to Gonzalez. Oyola laughed and responded yes, "or [Victim-5's] dead."

16. Noriega and Oyola discussed directing the Victims to write and notarize letters to be sent to the attorney handling Noriega's New York Charge. On August 18, 2017, during a recorded call, Noriega told Oyola, "You need to get with these bitches to make a statement." The next day, Oyola facilitated a three-way call with Noriega and Victim-1. During that call, Noriega directed Victim-1 on what to say in the letter, and stated that "we are going to stick with the same story, you are my girl, you were stripping and I met all the girls through you."

Jail Calls Between Noriega and Gonzalez in Furtherance of the Conspiracy

17. Recorded jail calls between Noriega and Gonzalez further confirmed that they worked together in the commercial sex business. For example, during a recorded jail call on September 25, 2017, Noriega and Gonzalez discussed: how much money Victim-1 had made by engaging in commercial sex acts; how much money Gonzalez had made from the commercial sex business; and how much money Gonzalez would need to advertise on Backpage to continue the commercial sex business.

18. During recorded jail calls, Gonzalez frequently recounted to Noriega how she had threatened Victim-1 and that Noriega was going to beat Victim-1 upon his release from prison. In one instance, Gonzalez told Victim-1 that Victim-1 could run but "[Noriega] gonna find you, he always does. And what you are doing [not earning enough money] is making it four times worse." Gonzalez further told Noriega that she had instructed Victim-1 not to leave the house without Gonzalez's permission.

19. Frequently, during the recorded jail calls, Noriega dictated text messages for Gonzalez to send to Victim-1, either asking about Victim-1's progress with her "dates," meaning commercial sex acts – e.g., on October 5, 2017, Gonzalez texted Victim-1, "He's on the phone, he wants to know when you get there and how much you are getting for the half [hour]" – or relaying threats – e.g., on October 12, 2017, Gonzalez texted Victim-1, "He's fuming,

you better hurry up.” During her calls with Noriega, Gonzalez frequently gave the phone to Victim-1 so that Noriega could threaten her directly – e.g., on October 9, 2017, Noriega told Gonzalez to call Victim-1’s phone and stated in a voicemail, “Get your ass home right now, top speed and get this fucking money and then do what the fuck you want to do.” Later that day, Noriega told Victim-1 through Gonzalez that Victim-1 was “on a suicide mission” and asked whether she wanted him to be the one to kill her.

20. During the recorded jail calls, in addition to discussing what Gonzalez should tell the Victims to ensure their continued participation in their commercial sex business, Noriega gave Gonzalez detailed instructions about how to market the commercial sex business. To that end, in a recorded jail call on October 9, 2017, Noriega provided Gonzalez with access to his Backpage account, including sharing the email address that he used to login as well as his account password. Noriega also instructed Gonzalez to advertise Victim-1 on other websites that are used for commercial sex. Later on, Gonzalez told Noriega the number of prostitution calls that Victim-1 had received and that she [Gonzalez] had answered some of them for Victim-1. Noriega and Gonzalez discussed sending Victim-1 to dates using Gonzalez’s Uber account and the cost of putting money on Victim-1’s “work” phone.

21. During the recorded jail calls, Gonzalez and Noriega discussed how they would continue the operation once Noriega returned home. For example, in a recorded jail call on October 6, 2017, Noriega commented to her that he would have to go with Victim-1 “to the spot” to “babysit,” to which Gonzalez responded, “No you’re not because you are going to have to do outcalls, you can’t do what you use to do. Are you fucking crazy, do you want to go back?” Based on my training and experience, and information gathered during this investigation, the term “back” referred to prison. Gonzalez further stated, “What makes you think we are just going to drop her off at a hotel while she’s working, and she doesn’t have to be watched? That’s why the stuff that she is doing now, because she is not being watched. I’m going to have shifts when I can work, make my mark for the day and come home.”

22. Noriega and Gonzalez also discussed finding and punishing the Victims if they attempted to leave the Paterson House before Noriega returned from prison. For example, on recorded jail call on September 27, 2017, Gonzalez told Noriega that if one of the Victims left the Paterson Residence, once Noriega was released from jail, Gonzalez would help Noriega locate that victim and cause her bodily harm. Specifically, Gonzalez said “I do not want to miss the smack, the beating, the whole nine yards.”

23. Noriega and Gonzalez also discussed how Noriega had beaten the Victims to keep them under control. For example, in a recorded jail call on October 11, 2017, Gonzalez commented: “Yo, now I know why you use to fuck up these girls, I will never criticize you for that again.” Later, during an

argument, Gonzalez stated, "You could control those bitches because they were scared of you," to which Noriega responded, "Stop talking bro."

24. Gonzalez and Noriega also discussed how easy it was for him to manipulate the women who previously had worked for him. In one instance from a recorded jail call on October 5, 2017, Gonzalez and Noriega stated:

Gonzalez: I can't take it. I'm starting to understand this game. These bitches are dumb bitches, dumb mother fucking bitches. I can see why you can manipulate them.

Noriega: Nah, I can't do this with somebody that has got a head on their shoulders.