

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of New Mexico

**FILED**  
UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

MAR 24 2016 *W*

**MATTHEW J. DYKMAN**  
CLERK

United States of America )

v. )

Cordny Henry )

Case No. )

Defendant(s)

*16mj 1205*

**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 September 2 - September 12, 2015 in the county of Bernalillo in the  
District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. Sec. 1591	The sex trafficking of children or by force, fraud, or coercion;
18 U.S.C. Sec. 2(a)	Whoever aids, abets, counsels, commands, induces, or procures the above-mentioned offense

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

*[Signature]*  
Complainant's signature

Ross Zuercher, Special Agent - FBI  
Printed name and title

Sworn to before me and signed in my presence.

Date: March 24, 2016

*[Signature]*  
Judge's signature

**KAREN B. MOLZEN**  
U.S. MAGISTRATE JUDGE  
Printed name and title

City and state: Albuquerque, New Mexico

**AFFIDAVIT**

Your Affiant, Ross Zuercher, having been duly sworn, does hereby depose and say:

**INTRODUCTION**

1. I have been a Special Agent (SA) of the Federal Bureau of Investigation (FBI), United States Department of Justice, since August 2012. As such, I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request arrest warrants. I am currently assigned to the FBI’s Albuquerque Violent Crime Program, as such, I am authorized to investigate crimes against children. The information set forth in this affidavit was derived from my own investigation and/or communicated to me by other sworn law enforcement officers of the FBI and the Bernalillo County Sheriff’s Office. Because this affidavit is submitted for the limited purpose of securing an arrest warrant, your Affiant has not included each and every fact known to me concerning this investigation. Your Affiant has set forth only those facts that your Affiant believes are necessary to establish that probable cause to support a criminal complaint against CORDNY HENRY in violation of Title 18 U.S.C. §§ 2(a), 1591(a)(1), (b), (c), (e)(2)(B), (e)(3), and (e)(4).

**REQUEST FOR SEALING**

2. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application, affidavit, and search warrant. Your Affiant believes that sealing these documents is necessary to protect the integrity of the case because the item to be searched is relevant to an ongoing investigation.

**RELEVANT STATUTES**

3. This investigation concerns alleged violations of certain activities relating to material involving sex trafficking pursuant to Title 18 U.S.C. §§ 2, and 1591:
  - a. 18 U.S.C. § 1591(a)(1) makes it a federal crime for any person who knowingly in or affecting interstate or foreign commerce, recruits, entices, harbors, transports, provides, obtains, advertises, maintains, patronizes, or solicits by any means a person knowing, or, except where the act constituting the violation of paragraph (1) is advertising, in reckless disregard of the fact, that means of force, threats of force, fraud, coercion described in subsection (e)(2), or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall be punished as provided in subsection (b).
  - b. 18 U.S.C. § 1591(b) provides that punishment for an offense under subsection (a) is not less than 15 years or for life, if the offense was effected by means of force, threats of force, fraud, or coercion, or any combination of such means, or if the person recruited, enticed, harbored, transported, provided, obtained, advertised, patronized, or solicited had not attained the age of 14. If the offense was not

effected by force, fraud, or coercion, and the person had attained the age of 14 but not yet the age of 18, then the punishment is not less than 10 years or for life.

- c. 18 U.S.C. § 1591(c) provides that in a prosecution under (a)(1), in which the defendant had a reasonable opportunity to observe the person so recruited, enticed, harbored, transported, provided, obtained, maintain, patronized, or solicited, the Government need not prove that the defendant knew, or recklessly disregarded the fact, that the person had not attained the age of 18 years.
- d. 18 U.S.C. § 1591(e)(2)(B) defines “coercion,” in relevant part, as: (A) threats of serious harm to or physical restraint against any person; or (B) as any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person.
- e. 18 U.S.C. § 1591(e)(3) defines “commercial sex act” as any sex act, on account of which anything of value is given to or received by any person.
- f. 18 U.S.C. § 1591(e)(4) defines “serious harm” as any harm, whether physical or nonphysical, including psychological, financial, or reputational harm, that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing commercial sexual activity to avoid incurring that harm.
- g. 18 U.S.C. § 2(a) punishes as a principal whoever aids, abets, counsels, commands, induces, or procures the commission of the above-mentioned offense.

#### **DETAILS OF THE INVESTIGATION**

- 4. The following sexual exploitation of Jane Doe occurred between the approximate dates of September 2-12, 2015. Jane Doe was 13 years of age during the aforementioned dates. Detective Kyle Woods of the Bernalillo County Sheriff’s Office (BCSO) was the initial investigating officer. This Affidavit is based both on the investigation of Detective Woods, as well as your Affiant’s own involvement with the investigation.
- 5. Jane Doe ran away from her home in Albuquerque, New Mexico on September 2, 2015. Jane Doe was recovered in California on September 12, 2015. Jane Doe disclosed having been trafficked in the sex trade in both Albuquerque, New Mexico and Los Angeles, California. Detective Woods learned that Jane Doe was taken to California by a “pimp,” later identified as Cordny Henry (hereafter HENRY). Jane Doe subsequently identified HENRY through a photograph array as the man who trafficked her in Albuquerque and California.
- 6. During a forensic interview conducted on January 25, 2016, Jane Doe discussed the details of the timeframe from September 2 through 12, 2015. Jane Doe described how she first met HENRY, stating that she was having trouble with her family and other issues so she ran away from home. Jane Doe said she was coming home when she met HENRY and they exchanged phone numbers. She stated he made comments to boost her self-esteem. She said they started a text message conversation, during which he asked if she sold her body. She stated HENRY continued to entice her, and that she waited until her parents fell asleep to sneak out the door and head towards the McDonald’s located at Gibson and San Mateo in Albuquerque,

New Mexico. She stated HENRY, along with a black female named "Kandy" picked her up at the McDonald's.

7. Jane Doe disclosed that her street name was "Paris Monroe." Jane Doe stated that HENRY took photographs of her and posted them online in advertisements promoting prostitution. Jane Doe stated that she did not create any of her own online postings. Jane Doe disclosed that HENRY also had other females in the sex trade posted online, promoting prostitution. Jane Does stated that HENRY purchased her a touch screen cellular phone and she was told to call him "Daddy."
8. Jane Doe disclosed that "Kandy" taught her the rates and rules for prostituting. Kandy was subsequently identified as Juanita Williams (hereafter WILLIAMS). Jane Doe was shown a photograph array including a photograph of WILLIAMS, and positively identified WILLIAMS as "Kandy." Jane Doe reported that WILLIAMS gave her directions on how to prostitute herself. WILLIAMS also explained the pay structure for the different types of sexual acts: \$40 for oral sex, \$60-80 for sex with a condom, and \$100-200 for sex at the hotel. Jane Doe was instructed by WILLIAMS that she had to return with a least \$500 or she would have her "ass beat." Jane Doe had to make contact with WILLIAMS and inform her each time she had a customer.
9. Jane Doe was forced to engage in commercial sex acts in Albuquerque almost immediately. Jane Doe engaged in commercial sex acts in what she described as a "trap house," or a hotel or location where the sex acts took place. One trap house utilized in the Albuquerque area was later identified as the Bow and Arrow Motel located at 8300 Central Avenue SE, Albuquerque, New Mexico.
10. Jane Doe said she worked in Albuquerque off of Central. HENRY would drop her and WILLIAMS off on Central by the mountains and they would walk down Central. Jane Doe stated she would communicate with WILLIAMS by calling her every time they would have a customer, and that she would tell WILLIAMS when she was going to the trap hotel with a customer.
11. Jane Doe said her and WILLIAMS would typically get dropped off around 6am and work until approximately 1pm. She stated they would then work from about 5pm-3am. She stated they would sleep between those time frames. She stated they would get food and extra time off once they got their \$500. Jane Doe stated that HENRY controlled purchasing food as well
12. Jane Doe was told to ask customers if they were cops. If they said no, they had to prove it by showing their penises or doing something sexual. Jane Doe was instructed that if she was ever arrested, she was supposed to say that she was engaging in prostitution by herself. If she followed the rules, HENRY would bail her out. They were required to check in with HENRY if they had any law enforcement contact.
13. Jane Doe said that at the end of the night, she and WILLIAMS would put their money (approximately \$1,000-\$2,000 per night) in the refrigerator. Jane Doe stated HENRY took all the money, and that they did not keep any of it. She said HENRY would buy them what they needed, but controlled all the money. Jane Doe stated HENRY would call them every hour and ask how much money there was, so he would know if any was missing. Jane Doe stated she HENRY had sex with her both in Albuquerque and in California; the time in Albuquerque was at the Bow and Arrow. When asked for clarification on having sex with HENRY, Jane Doe stated that HENRY used a condom and, "it went in." Jane Doe clarified

“it” as “the penis went into the vagina.”

14. Jane Doe stated that on one occasion HENRY slapped her on her face for making the comment to him that “Pimps are little bastards, and they’re pathetic.” She stated HENRY would touch her sexually, but did not hit her or do other physical violence towards her. She stated she would shut down emotionally when people touched her sexually.
15. On approximately September 4, 2015, WILLIAMS locked HENRY out of the room at the Bow and Arrow Motel. HENRY broke the window of the motel room to gain access. Upon gaining access, HENRY took WILLIAMS to bathroom and physically abused WILLIAMS in the presence of Jane Doe. On October 15, 2015, Detective Woods talked to a manager of the Bow and Arrow who remembered the incident and described a tall, slender, black male as the renter of the room, and who was with a short, chubby white girl and either a light-skinned black or Hispanic female. The manager said the incident occurred in room 18. The manager also reported that the vehicle HENRY registered with the hotel was a gold BMW X5 sport utility vehicle with California license plates.
16. Jane Doe stated she would lie about her age. She told the HENRY she was 18, and he had asked for her ID, but she would lie about having lost it. Jane Doe stated he never found out she was a different age than 18. Jane Doe stated WILLIAMS knew she was younger than 18, and commented about it. Jane Doe said she insinuated to WILLIAMS that she was younger than 18, but did not overtly tell her.
17. During her time with WILLIAMS and HENRY, they traveled by vehicle to California. Jane Doe stated the vehicle was gold, but did not remember what type exactly. She believed it may have been a gold SUV and that it could have had third-row seating. Jane Doe stated she slept the whole way to California. Jane Doe said HENRY had girls everywhere, mostly advertising services online. HENRY once suggested leaving Jane Doe and WILLIAMS in California with a car, while he went to Washington.
18. Jane Doe said that when they arrived in California, HENRY bought her clothes with cash. She said they worked for two days straight. She stated she had \$80.00 at one point, and decided to ask a customer for a ride to Arizona. She said he kept trying to have sex with her and that he kept trying to touch her in a sexual manner. She stated she told him to pull over so she could get out of the car. She got out and walked to the nearest gas station to ask if there was a bus station in order for her to go home.
19. Jane Doe was asked about the photographs taken of her. Jane Doe said she took one of herself in California. Jane Doe stated that HENRY took pictures of her and posted them online, but she did not know what site. Jane Doe stated that HENRY told her he posted his phone number with the advertisements. Jane Doe told investigators that the pictures of her were not on her phone. Jane Doe stated the picture HENRY took did not show her face. She stated he took a picture of her “gluteus maximus” with just underwear on.
20. Utilizing a Law Enforcement resource, Detective Woods located a Backpage.com advertisement from September 3 and 4, 2015, posted in Albuquerque, NM, with photographs of Jane Doe. One photograph displayed Jane Doe’s face, as well as a tattoo of a marijuana leaf on her arm, which Detective Woods has observed in person on numerous occasions. The post number was #6777543. The following is a screenshot of the narrative from the post:

Let's escape together in total bliss! You will enjoy my sweet and energetic attitude, and I never rush. I just want you to relax and enjoy our time together. I'm happy with what I do and confident in my looks. No need to debate if my pics are really me.. What you see is Exactly what you get! I have a sexy curvaceous body & baby soft skin, with blonde Brunette hair. Be my first brand new... 505-227-9157 Paris Monroe

21. Detective Woods obtained a warrant for the above listed advertisement on Backpage.com, and served it to Backpage.com on January 26, 2016. Backpage.com responded to the warrant on the same date. Detective Woods observed that the same email, jackdnls58@gmail.com, was used to post Jane Doe on Backpage.com was used to post a female identified by her street name as "Kandy" on Backpage.com.
22. Detective Woods obtained a warrant to the email service provider in reference to the email used to post the Backpage.com advertisements listed. Detective Woods viewed the return and located email messages that were addressed to HENRY. One was for clothing from the online retailer, AliExpress.com. Another email was addressed to HENRY from grubhub.com, an online food delivery service. Also listed in the search warrant return were numerous Facebook notifications for the Facebook account, "Oonky Henry."
23. Detective Woods searched Facebook.com for "Oonky Henry," and came across a Facebook profile appearing to belong to HENRY. The profile photograph is substantially similar to HENRY and the listed birth date on the profile is 09/09/1986, which is HENRY's birth date.
24. On January 28, 2016, Detective Woods reviewed a police report dated on 09/09/2015 involving HENRY. The report was made by a woman who purported to be HENRY'S mother, saying that she was worried that he had not returned her phone calls. She also said that HENRY was traveling with a woman named JUANITA WILLIAMS. Detective Woods located a prior police report, dated May 2015, where WILLIAMS reported that Henry forced her into prostitution.
25. On March 14, 2016, Detective Woods observed that WILLIAMS was posted on Backpage.com as being in Albuquerque. The photographs and narrative of the post were the same as past posts. The post ID was #6853238.
26. Later that day, WILLIAMS was detained in the vicinity of Central and San Mateo and brought to the BCSO main building located at 400 Roma in Albuquerque. After being advised of her rights, WILLIAMS spoke with investigators. WILLIAMS told investigators that she did know HENRY, and that he was an "on again off again" ex-boyfriend. She stated that the police report from May 2015 stating that Henry forced her into prostitution was a lie and that she told law enforcement that she lied to them. WILLIAMS acknowledged that she may have had an argument with HENRY but did not want to divulge information regarding that incident. WILLIAMS denied any physical abuse by HENRY.
27. WILLIAMS was shown a photograph of Jane Doe and identified her as a female that she met while she was working as a prostitute in Albuquerque. WILLIAMS denied any involvement with the sexual trafficking of Jane Doe, but did say that she assisted Jane Doe with the "rules of the game," meaning that WILLIAMS taught Jane Doe how to prostitute while she was working in Albuquerque. WILLIAMS told investigators that both she and Jane Doe worked on Central together. WILLIAMS also admitted to telling Jane Doe how much she could charge for various sexual services.
28. WILLIAMS stated that any business relationship between HENRY and Jane Doe was their

business and that WILLIAMS was not around when Henry first met Jane Doe. WILLIAMS did say that she allowed Jane Doe to stay with her in her hotel room when Jane Doe told her that she had no place to go. WILLIAMS also told investigators that she remembered a trip where she, Jane Doe, and HENRY traveled from Albuquerque, New Mexico to California via car. WILLIAMS remembered that Jane Doe also engaged in prostitution while in California, but did not stick around for long.

**FEDERAL JURISDICTION**

29. The language of 18 United States Code Section 1591 sets forth that interstate or foreign commerce must be affected. Jane Doe was transported from Albuquerque, New Mexico across state lines to California by WILLIAMS and HENRY, thus satisfying the interstate nexus requirement.

**CONCLUSION**

30. Based on all of the above information, your Affiant submits there is probable cause to believe that CORDNY HENRY, violated Title 18 U.S.C. §§ 2(a), 1591(a)(1), (b), (c), (e)(2)(B), (e)(3), and (e)(4). Your Affiant requests an arrest warrant based upon the criminal complaint in this matter.
31. Assistant United States Attorney Sarah Mease has authorized federal prosecution in this matter.
32. I swear that this information is true and correct to the best of my knowledge.

  
\_\_\_\_\_  
Ross Zuercher, Special Agent - FBI

SUBSCRIBED and SWORN to before  
me this 24 day of March, 2016.

  
\_\_\_\_\_  
United States Magistrate Judge