

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

EFRAIN GRANADOS-CORONA,
a/k/a "Chavito,"
a/k/a "Cepillo,"
RAUL ROMERO-GRANADOS,
a/k/a "Chicarcas,"
a/k/a "El Negro,"
ISAAC LOMELI-RIVERA,
a/k/a "Giro,"
JUAN ROMERO-GRANADOS,
a/k/a "Chegoya,"
a/k/a "El Guero,"
ALAN ROMERO-GRANADOS,
a/k/a "El Flaco,"
PEDRO ROJAS-ROMERO,
EMILIO ROJAS-ROMERO,

Defendants.

SEALED SUPERSEDING
INDICTMENT

S3 16 Cr. 324

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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COUNT ONE

(Conspiracy to Commit Sex Trafficking)

The Grand Jury charges:

The Sex Trafficking Scheme

1. EFRAIN GRANADOS-CORONA, a/k/a "Chavito," a/k/a "Cepillo," RAUL ROMERO-GRANADOS, a/k/a "Chicarcas," a/k/a "El Negro," ISAAC LOMELI-RIVERA, a/k/a "Giro," JUAN ROMERO-GRANADOS, a/k/a "Chegoya," a/k/a "El Guero," ALAN ROMERO-GRANADOS, a/k/a "El Flaco," PEDRO ROJAS-ROMERO, and EMILIO ROJAS-ROMERO, the

defendants, are members of an international sex trafficking organization (the "STO"). Many of the members of the STO are related by blood, marriage and community. For example:

a. EFRAIN GRANADOS-CORONA is the uncle of RAUL ROMERO-GRANADOS, ISAAC LOMELI-RIVERA (through LOMELI-RIVERA's relationship with EFRAIN GRANADOS-CORONA's niece), JUAN ROMERO-GRANADOS, and ALAN ROMERO-GRANADOS.

b. PEDRO ROJAS-ROMERO and EMILIO ROJAS-ROMERO are brothers.

c. JUAN ROMERO-GRANADOS and ALAN ROMERO-GRANADOS are also brothers.

d. ISAAC LOMELI-RIVERA is RAUL ROMERO-GRANADOS's brother-in-law.

2. Between at least in or about 2000 and the present, members of the STO (the "Traffickers") have used romantic promises, physical and sexual violence, threats of the same, lies and coercion to force and coerce adult and minor women (the "Victims") to work in prostitution in both Mexico and the United States.

3. In most cases, a Trafficker romances a Victim - frequently a minor - in Mexico. The Traffickers then use multiple means to isolate the Victim from her family. In some cases, the Trafficker uses romantic promises to induce the Victim to leave her family and live with him. In other cases,

the Trafficker rapes the Victim, making it difficult for her to return to her family due to the associated stigma.

4. Once a Victim is separated from her family, the Trafficker frequently monitors her communications, keeps her locked in an apartment, leaves her without food, and engages in physical or sexual violence against the Victim.

5. Traffickers often tell Victims that the Traffickers owe a significant debt and that the Victim must work in prostitution to assist in repaying the debt.

6. Traffickers typically begin forcing the Victims to work in prostitution in Mexico, frequently in a neighborhood of Mexico City known as "La Merced." Victims are frequently required to see at least 20 to 40 customers per day. Traffickers monitor the number of clients a Victim sees by surveilling the Victim, communicating with brothel workers, and by counting the number of condoms provided to a Victim.

7. Traffickers typically require the Victims to turn over all of the prostitution proceeds to the Traffickers.

8. After a Victim has worked in prostitution in Mexico for some time, Traffickers typically arrange for the Victim to be smuggled into the United States. Members of the STO assist one another in making smuggling arrangements. In many cases, multiple traffickers and multiple victims are smuggled into the United States together. In other cases, one Trafficker may

remain in Mexico while arranging for a Victim to be smuggled together with another Trafficker and other Victims.

9. Once in the United States, the members of the STO generally maintain their Victims at one of several shared apartments in New York City. Victims living in the same apartment are frequently forbidden to communicate with one another.

10. Once in the United States, Traffickers continue to use physical and sexual violence, threats of the same, lies and coercion to force the Victims to work in prostitution.

11. In most cases, the Trafficker or another member of the STO provides a Victim with contact information with which to find work. The Victims typically work weeklong shifts either in a brothel, or in a "delivery service." In a delivery service, the Victim is delivered to a customer's home by a "driver." These brothels and delivery services are located both within New York, and in surrounding states, including, but not limited to Connecticut, Maryland, Virginia, New Jersey and Delaware.

12. Generally, each customer pays \$30-35 for 15 minutes of sex. Of that, half of the money typically goes to the driver (in the case of a delivery service) or to the brothel. The other \$15 goes to the Victim, who is then typically forced to give all of the proceeds to the Trafficker. When a Trafficker

is unavailable, a Victim may also give the proceeds to another member of the STO.

13. The Traffickers then frequently send, or have their Victims send, some of the prostitution proceeds to Traffickers' family members and associates in Mexico by wire transfer. Such transfers provide financial assistance to the Traffickers' families and provide financial support to the Traffickers themselves if they return to Mexico.

14. After periods of victimization - typically months or years - many Victims manage to escape. In some cases, even after a Victim has escaped, the Traffickers force the Victim to return by threatening the Victim and/or her family.

STATUTORY ALLEGATIONS

15. From at least in or about 2000, up to and including at least in or about the date of this Indictment, in the Southern District of New York and elsewhere, EFRAIN GRANADOS-CORONA, a/k/a "Chavito," a/k/a "Cepillo," RAUL ROMERO-GRANADOS, a/k/a "Chicarcas," a/k/a "El Negro," ISAAC LOMELI-RIVERA, a/k/a "Giro," JUAN ROMERO-GRANADOS, a/k/a "Chegoya," a/k/a "El Guero," ALAN ROMERO-GRANADOS, a/k/a "El Flaco," PEDRO ROMERO-GRANADOS, and EMILIO ROMERO-GRANADOS, the defendants, willfully and knowingly, in and affecting interstate commerce, did combine, conspire, confederate and agree to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and

solicit, by any means, persons, and to benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause the persons to engage in commercial sex acts, in violation of Title 18, United States Code, Sections 1591(a) and (b) (1); and (2) such persons had not attained the age of 18 years and would be caused to engage in one or more commercial sex acts, in violation of Title 18, United States Code, Sections 1591(a) (1) and 1591(a) and (b) (2), to wit, EFRAIN GRANADOS-CORONA, RAUL ROMERO-GRANADOS, ISAAC LOMELI-RIVERA, JUAN ROMERO-GRANADOS, a/k/a "Chegoya," a/k/a "El Guero," ALAN ROMERO-GRANADOS, a/k/a "El Flaco," PEDRO ROJAS-ROMERO, and EMILIO ROJAS-ROMERO, and others known and unknown recruited, enticed, transported, provided and maintained women, and caused the women to engage in commercial sex acts, knowing, and in reckless disregard of the fact that the women were engaging in the commercial sex acts as a result of force, threats of force, fraud and coercion and that many of the women were less than 18 years of age.

(Title 18, United States Code, Section 1594.)

COUNTS TWO AND THREE

(Sex Trafficking of a Minor by Force, Fraud or Coercion)

The Grand Jury further charges:

16. The allegations contained in Paragraphs 1 through 14 are repeated and realleged as though fully set forth herein.

17. In or about the dates set forth below, and with respect to the Victims specified below, in the Southern District of New York and elsewhere, the defendants specified below knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain, and maintain, by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, knowing and in reckless disregard of the fact, that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause the person to engage in a commercial sex act, and that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, to wit, the specified defendants recruited, enticed, transported, provided and maintained minor women, and caused the minor women to engage in commercial sex acts, knowing, and in reckless disregard of the fact that the women were engaging in the commercial sex acts as a result of force, threats of force, fraud and coercion.

Count	Defendant	Timeframe	Victim
Two	RAUL ROMERO-GRANADOS, a/k/a "Chicarcas," a/k/a "El Negro"	2005-2008	Victim-3
Three	EFRAIN GRANADOS-CORONA, a/k/a "Chavito," a/k/a "Cepillo"	2007-2011	Victim-10

(Title 18, United States Code, Section 1591(a), (b)(1), (b)(2) and 2.)

COUNT FOUR

(Sex Trafficking of a Minor by Force, Fraud or Coercion)

The Grand Jury further charges:

18. The allegations contained in Paragraphs 1 through 14 are repeated and realleged as though fully set forth herein.

19. From in or about 2005 through in or about 2007, in the Southern District of New York and elsewhere, RAUL ROMERO-GRANADOS, a/k/a "Chicarcas," a/k/a "El Negro," and EFRAIN GRANADOS-CORONA, a/k/a "Chavito," a/k/a "Cepillo," the defendants, knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, and obtain, by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, knowing that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause the person to engage in a commercial sex act, and that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act, to wit,

RAUL ROMERO-GRANADOS and EFRAIN GRANADOS-CORONA recruited, enticed, transported, provided and maintained Victim-1, and caused Victim-1 to engage in commercial sex acts, knowing that Victim-1 was a minor and was engaging in the commercial sex acts as a result of force, threats of force, fraud and coercion.

(Title 18, United States Code, Section 1591(a), (b)(1), (b)(2) and 2.)

COUNTS FIVE TO ELEVEN

(Sex Trafficking by Force, Fraud, and Coercion)

The Grand Jury further charges:

20. The allegations contained in Paragraphs 1 through 14 are repeated and realleged as though fully set forth herein.

21. In or about the dates set forth below, and with respect to the specified Victims, in the Southern District of New York and elsewhere, the below specified defendants, in and affecting interstate and foreign commerce, willfully and knowingly did recruit, entice, harbor, transport, provide, obtain and maintain, by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which has engaged in such acts, knowing and in reckless disregard of the fact that that force, fraud, and coercion, as described in Section 1591(c)(2) of Title 18 of the United States Code, would be used to cause the person to engage in a commercial sex act, to wit, the specified

defendants recruited, enticed, transported, provided and maintained the specified women, among others, and caused the women to engage in commercial sex acts, knowing, and in reckless disregard of the fact that the women were engaging in commercial sex acts as result of force, fraud and coercion.

Count	Defendant	Timeframe	Victim
FIVE	EFRAIN GRANADOS-CORONA a/k/a "Chavito," a/k/a "Cepillo," PEDRO ROJAS-ROMERO RAUL ROMERO-GRANADOS a/k/a "Chicarcas," a/k/a "El Negro"	2003-2009	Victim-2
SIX	ISAAC LOMELI-RIVERA, a/k/a "Giro"	2007-2009	Victim-7
SEVEN	ISAAC LOMELI-RIVERA, a/k/a "Giro"	2008-2009	Victim-8
EIGHT	JUAN ROMERO-GRANADOS, a/k/a "Chegoya," a/k/a "El Guero"	2008-2009	Victim-9
NINE	ALAN ROMERO-GRANADOS, a/k/a "El Flaco"	2008-2011	Victim-12
TEN	EMILIO ROJAS-ROMERO	2010-2013	Victim-13
ELEVEN	PEDRO ROJAS-ROMERO EMILIO ROJAS-ROMERO	2000-2008	Victim-14

(Title 18, United States Code, Section 1591(a), (b) (1) and 2.)

COUNTS TWELVE TO FOURTEEN**(Transportation of a Minor for Purpose of Prostitution)**

The Grand Jury further charges:

22. The allegations contained in Paragraphs 1 through 14 are repeated and realleged as though fully set forth herein.

23. In or about the dates set forth below, and with respect to the specified Victims in the Southern District of New York and elsewhere, the specified defendants knowingly did transport an individual who had not attained the age of 18 years in interstate commerce, with intent that such individual engage in prostitution, and any sexual activity for which any person can be charged with a criminal offense, including violations of New York State Penal Law, Sections, 130.65 (Sexual Abuse in the First Degree), 230.00 (Prostitution), 230.15 (Promoting Prostitution), 230.20 (Promoting Prostitution in the Fourth Degree), 230.25 (Promoting Prostitution in the Third Degree), 260.10(1) (Endangering the Welfare of a Child), 110.00 (Attempt), to wit, the specified defendants caused the specified minor victims to travel from Mexico to New York and across state lines for the purpose of engaging in prostitution.

Count	Defendant	Timeframe	Victim
TWELVE	EFRAIN GRANADOS-CORONA, a/k/a "Chavito," a/k/a "Cepillo"	2008-2009	Victim-10

THIRTEEN	RAUL ROMERO-GRANADOS, a/k/a "Chicarcas," a/k/a "El Negro"	2006-2007	Victim-3
FOURTEEN	RAUL ROMERO-GRANADOS, a/k/a "Chicarcas," a/k/a "El Negro"	2006-2007	Victim-1

(Title 18, United States Code, Sections 2423(a) and 2.)

COUNTS FIFTEEN TO TWENTY-ONE

(Transportation for Purpose of Prostitution)

The Grand Jury further charges:

24. The allegations contained in Paragraphs 1 through 14 are repeated and realleged as though fully set forth herein.

25. In or about the dates specified below, and with respect to the specified Victims, in the Southern District of New York and elsewhere, the specified defendants, and others known and unknown, willfully and knowingly transported and attempted to transport an individual in interstate commerce, with intent that the individual engage in prostitution, and aided and abetted the same, to wit, the specified defendants arranged to have the specified victims travel from Mexico to New York and across state lines for the purpose of engaging in prostitution.

COUNT	DEFENDANT	TIME FRAME	VICTIM
FIFTEEN	EFRAIN GRANADOS-CORONA, a/k/a "Chavito," a/k/a "Cepillo"	2006-2009	Victim-2

SIXTEEN	ISAAC LOMELI-RIVERA, a/k/a "Giro"	2007-2009	Victim-7
SEVENTEEN	ISAAC LOMELI-RIVERA, a/k/a "Giro"	2008-2009	Victim-8
EIGHTEEN	JUAN ROMERO-GRANADOS a/k/a "Chegoya," a/k/a "El Guero"	2009	Victim-9
NINETEEN	ALAN ROMERO-GRANADOS a/k/a "El Flaco"	2010-2011	Victim-12
TWENTY	PEDRO ROJAS-ROMERO	2006-2008	Victim-14
TWENTY-ONE	EMILIO ROJAS-ROMERO	2010-2013	Victim-13

(Title 18, United States Code, Sections 2421 and 2.)

FORFEITURE ALLEGATIONS

26. As a result of committing the sex trafficking offenses, in violation of Title 18, United States Code, Sections 1591(a), (b)(1), (b)(2), 1594 and 2, alleged in Counts One through Eleven of this Indictment, EFRAIN GRANADOS-CORONA, a/k/a "Chavito," a/k/a "Cepillo," RAUL ROMERO-GRANADOS, a/k/a "Chicarcas," a/k/a "El Negro," ISAAC LOMELI-RIVERA, a/k/a "Giro," JUAN ROMERO-GRANADOS, a/k/a "Chegoya," a/k/a "El Guero," ALAN ROMERO-GRANADOS, a/k/a "El Flaco," PEDRO ROJAS-ROMERO, and EMILIO ROJAS-ROMERO, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594:

(1) any property, real and personal, that was involved in, used or intended to be used to commit or to facilitate the commission of the offenses, and any property traceable to such property;

and (2) any property, real and personal, constituting or derived

from, any proceeds obtained, directly or indirectly, as a result of the offenses, or any property traceable to such property.

27. As a result of committing the transportation for the purpose of prostitution and transportation of minors for the purpose of prostitution offenses, in violation of Title 18, United States Code, Sections 2423(a), 2423(d) and 2, alleged in Counts Twelve through Twenty-One of this Indictment, EFRAIN GRANADOS-CORONA, a/k/a "Chavito," a/k/a "Cepillo," RAUL ROMERO-GRANADOS, a/k/a "Chicarcas," a/k/a "El Negro," ISAAC LOMELI-RIVERA, a/k/a "Giro," JUAN ROMERO-GRANADOS, a/k/a "Chegoya," a/k/a "El Guero," ALAN ROMERO-GRANADOS, a/k/a "El Flaco," PEDRO ROJAS-ROMERO, and EMILIO ROJAS-ROMERO, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 2428; (1) any property, real and personal, used or intended to be used to commit or to facilitate the commission of the offenses; and (2) any property, real and personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses.

Substitute Assets Provision

28. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described above.

(Title 18, United States Code, Sections 1594 and 2428;
Title 21, United States Codes, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


PREET BHARARA *att*
United States Attorney

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SEALED SUPERSEDING INDICTMENT

S3 16 Cr. 324

(Title 18, United States Code, Section
1594; 1591(a), (b)(1), (b)(2), 2421,
2423(a) and 2.


Foreperson

PREET BHARARA
U.S. Attorney.

9/15/16 PM Superseding Ind 3 *PM Judge Mac*