

Approved: Frank Balsamello  
FRANK BALSAMELLO / MICHAEL KROUSE  
Assistant United States Attorneys

Before: THE HONORABLE KATHARINE H. PARKER  
United States Magistrate Judge  
Southern District of New York

**17 MAG 3547**

----- X

|                            |   |                         |
|----------------------------|---|-------------------------|
| UNITED STATES OF AMERICA   | : | <u>SEALED COMPLAINT</u> |
|                            | : |                         |
| - v. -                     | : | Violation of 18 U.S.C.  |
|                            | : | §§ 1591(a)(1), (b)(1),  |
| OLIVER SOHNGEN,            | : | and (b)(2); 1594(a) and |
| a/k/a "Helmuth Moss,"      | : | (c); 2422(b), and 2     |
| a/k/a "Stephan Weierbach," | : |                         |
|                            | : | COUNTY OF OFFENSE:      |
| Defendant.                 | : | BRONX                   |

----- X

SOUTHERN DISTRICT OF NEW YORK, ss.:

MIGUEL COLLAZO, being duly sworn, deposes and says that he is Special Agent with Homeland Security Investigations and charges as follows:

COUNT ONE

(Conspiracy to Engage in Sex Trafficking of Minors)

1. Between at least in or about March 2013 and at least in or about November 2013, in the Southern District of New York and elsewhere, OLIVER SOHNGEN, a/k/a "Helmuth Moss," a/k/a "Stephan Weierbach," the defendant, and others known and unknown, conspired and agreed with each other to knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means persons who had not attained the age of 18 years at the time (collectively, the "Minor Victims"), knowing, having had a reasonable opportunity to observe, and in reckless disregard of the fact that the Minor Victims had not attained the age of 18 years, and knowing that the Minor Victims would be caused to engage in commercial sex acts.

(Title 18, United States Code, Sections 1594(c), 1591(a)(1), (b)(1), and (b)(2), and 2.)

**COUNT TWO**

(Sex Trafficking of Minor Victim-1)

2. Between at least in or about March 2013 and at least in or about April 2013, in the Southern District of New York and elsewhere, OLIVER SOHNGEN, a/k/a "Helmuth Moss," a/k/a "Stephan Weierbach," the defendant, in or affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited a person who had attained the age of 14 years but had not attained the age of 18 years at the time ("Minor Victim-1"), knowing, having had a reasonable opportunity to observe, and in reckless disregard of the fact that Minor Victim-1 had not attained the age of 18 years, and knowing that Minor Victim-1 would be caused to engage in commercial sex acts, to wit, SOHNGEN engaged in commercial sex acts with Minor Victim-1, a seventeen-year-old girl.

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

**COUNT THREE**

(Sex Trafficking of Minor Victim-3)

3. At least in or about November 2013, in the Southern District of New York and elsewhere, OLIVER SOHNGEN, a/k/a "Helmuth Moss," a/k/a "Stephan Weierbach," the defendant, in or affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized, and solicited a person who had attained the age of 14 years but had not attained the age of 18 years at the time ("Minor Victim-3"), knowing, having had a reasonable opportunity to observe, and in reckless disregard of the fact that Minor Victim-3 had not attained the age of 18 years, and knowing that Minor Victim-3 would be caused to engage in commercial sex acts, to wit, SOHNGEN engaged in commercial sex acts with Minor Victim-3, a fifteen-year-old girl.

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

**COUNT FOUR**

(Attempted Sex Trafficking of Minor Victim-4)

4. At least in or about September 2013, in the Southern District of New York and elsewhere, OLIVER SOHNGEN, a/k/a "Helmuth Moss," a/k/a "Stephan Weierbach," the defendant, in or

affecting interstate and foreign commerce, attempted to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit a person who had not attained the age of 14 years at the time ("Minor Victim-4"), knowing, having had a reasonable opportunity to observe, and in reckless disregard of the fact that Minor Victim-4 had not attained the age of 14 years, and knowing that Minor Victim-4 would be caused to engage in commercial sex acts, to wit, SOHNGEN attempted to engage in commercial sex acts with Minor Victim-4, an eleven-year-old girl.

(Title 18, United States Code,  
Sections 1594(a), 1591(a)(1) and (b)(1), and 2.)

**COUNT FIVE**

(Attempted Sex Trafficking of Minor Victim-5)

5. At least in or about October 2013, in the Southern District of New York and elsewhere, OLIVER SOHNGEN, a/k/a "Helmuth Moss," a/k/a "Stephan Weierbach," the defendant, in or affecting interstate and foreign commerce, attempted to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit a person who had not attained the age of 14 years at the time ("Minor Victim-5"), knowing, having had a reasonable opportunity to observe, and in reckless disregard of the fact that Minor Victim-5 had not attained the age of 14 years, and knowing that Minor Victim-5 would be caused to engage in commercial sex acts, to wit, SOHNGEN attempted to engage in commercial sex acts with Minor Victim-5, an eight-year-old girl.

(Title 18, United States Code,  
Sections 1594(a), 1591(a)(1) and (b)(1), and 2.)

**COUNT SIX**

(Attempted Sex Trafficking of Minor Victim-6)

6. At least in or about October 2013, in the Southern District of New York and elsewhere, OLIVER SOHNGEN, a/k/a "Helmuth Moss," a/k/a "Stephan Weierbach," the defendant, in or affecting interstate and foreign commerce, attempted to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit a person who had not attained the age of 14 years at the time ("Minor Victim-6"), knowing, having had a reasonable opportunity to observe, and in reckless disregard of the fact that Minor Victim-6 had not attained the age of 14 years, and knowing that Minor Victim-6 would be caused to engage in commercial sex acts, to wit, SOHNGEN attempted to engage in

commercial sex acts with Minor Victim-6, a thirteen-year-old girl.

(Title 18, United States Code,  
Sections 1594(a), 1591(a)(1) and (b)(1), and 2.)

**COUNT SEVEN**

(Attempted Inducement of a Minor to Engage in Sexual Activity)

7. Between at least in or about March 2013 and in or about November 2013, in the Southern District of New York and elsewhere, OLIVER SOHNGEN, a/k/a "Helmuth Moss," a/k/a "Stephan Weierbach," the defendant, used facilities and means of interstate commerce to knowingly persuade, induce, entice, and coerce individuals who had not attained the age of 18 years to engage in prostitution and sexual activity for which a person can be charged with a criminal offense, and attempted to do the same, to wit, SOHNGEN used a cellphone to communicate with a sex trafficker about arranging to have sexual intercourse, oral sex, and other sexual contact with girls ages eight to sixteen years old, in violation of New York Penal Code Sections 130.25(2), 130.30(1), 130.35(4), 130.40(2), 130.45(1), 130.50(3) and (4), 130.55, 130.60(2), and 130.65(3) and (4).

(Title 18, United States Code, Sections 2422(b) and 2.)

**COUNT EIGHT**

(Attempted Inducement of a Minor to Engage in Sexual Activity)

8. Between at least in or about November 2015 and in or about January 2016, in the Southern District of New York and elsewhere, OLIVER SOHNGEN, a/k/a "Helmuth Moss," a/k/a "Stephan Weierbach," the defendant, used facilities and means of interstate commerce to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years to engage in prostitution and sexual activity for which a person can be charged with a criminal offense, and attempted to do the same, to wit, SOHNGEN used a cellphone to communicate with an undercover officer working for the New York City Police Department ("NYPD"), whom SOHNGEN understood to be a fifteen-year-old girl, and attempted to meet with the purported fifteen-year-old girl to engage in oral sex and other sexual contact, in violation of New York Penal Code Sections 130.25(2), 130.40(2), and 130.55.

(Title 18, United States Code, Sections 2422(b) and 2.)

The bases for my knowledge and for the foregoing charges, are, in part, as follows:

9. I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations ("HSI") and have been so employed for approximately seven years. During this time, I have conducted numerous investigations into offenses involving the sex trafficking and abuse of minors, including prostitution-related crimes, and I am familiar with the some of the ways in which such crimes are often committed. I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with other law enforcement officers and other individuals. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

#### Overview

10. As described in greater detail below, based on my involvement in this investigation, I have learned the following, among other things. OLIVER SOHNGEN, a/k/a "Helmuth Moss," a/k/a "Stephan Weierbach," the defendant, is the founder and director of a New York City music school. From in or about March 2013 to in or about November 2013, SOHNGEN appears to have exchanged text messages with an individual ("CC-1") for the purpose of purchasing commercial sex acts with minor girls ranging in age from eight to seventeen. Moreover, on at least two occasions, SOHNGEN engaged in various forms of sexual contact with fifteen- and seventeen-year-old girls, both times arranged by CC-1. I have also learned that, between in or about November 2015 and in or about January 2016, SOHNGEN appears to have used a cellular phone to communicate with an undercover NYPD officer who he understood to be a fifteen-year-old girl. SOHNGEN attempted to meet with the purported fifteen-year-old girl in order to engage in oral sex and other sexual contact.

#### March 2013 - November 2013: Sex Trafficking and Attempted Inducement of Minors

11. In or about November 2013, the NYPD arrested CC-1 on charges related to sex trafficking of minors and other offenses. Through subsequent investigation, NYPD detectives learned that

CC-1 had engaged in prostitution-related offenses with several girls under the age of 18 (the "Minor Victims").

12. Following CC-1's November 2013 arrest, investigators executed a search warrant for a cellphone used by CC-1 ("CC-1's Cellphone"). In CC-1's Cellphone they found contact information for – and text message exchanges with – several individuals who appeared to be clients of CC-1's illegal prostitution business, including one listed as "\$\$\$\$ Helmuth Moss Any," with notes "[An Alias For Minor Victim-1 ("Minor Victim-1's Alias")]. 160" ("CC-1's Cellphone Entry for Moss"). As explained in paragraph 15, *infra*, it appears that "Moss" is in fact OLIVER SOHNGEN, a/k/a "Helmuth Moss," a/k/a "Stephan Weierbach," the defendant.

13. I have spoken with Minor Victim-1 and two other minor victims ("Minor Victim-2" and "Minor Victim-3"), who told me the following, among other things:

a. Both Minor Victim-1 and Minor Victim-2 stated, in substance and in part, that in or about March 2013, CC-1 caused them to travel from their homes in New Jersey to CC-1's apartment on Davidson Avenue in the Bronx, New York (the "Davidson Avenue Apartment"), where CC-1 took sexually suggestive photographs of them and posted ads on Backpage.com with their photographs offering to sell them for sex acts.<sup>1</sup> Based on the dates of birth listed on their driver's licenses, both Minor Victim-1 and Minor Victim-2 were seventeen years old at the time.

b. Minor Victim-1 stated, in substance and in part, that in Backpage.com advertisements and in communications with CC-1's clients, she was known by Minor Victim-1's Alias. Between in or about March 2013 and in or about April 2013, CC-1 prostituted Minor Victim-1 and caused her to engage in sexual intercourse and other sex acts with multiple men in return for money, a percentage of which CC-1 kept for his own profit. I showed Minor Victim-1 a database photograph of OLIVER SOHNGEN, a/k/a "Helmuth Moss," a/k/a "Stephan Weierbach," the defendant (the "SOHNGEN Photograph"), among other photographs, and she stated that SOHNGEN appeared to be an individual with whom she engaged in a sex act inside the Davidson Avenue Apartment.

c. Minor Victim-2 stated, in substance and in part, that between in or about March 2013 and in or about April 2013,

---

<sup>1</sup> I have learned through training and research, among other things, that Backpage.com is headquartered and maintains its servers outside of New York State.

CC-1 prostituted Minor Victim-2 and caused her to engage in sexual intercourse and other sex acts with multiple men in return for money, a percentage of which CC-1 kept for his own profit. I showed Minor Victim-2 the SOHNGEN Photograph, among other photographs, and she stated, in substance and in part, that SOHNGEN looked familiar and that she believed he was one of Minor Victim-1's clients.

d. Minor Victim-3 stated, in substance and in part, that she had met CC-1 online and subsequently traveled to the Davidson Avenue Apartment, where CC-1 took photographs of her. From the text messages in CC-1's Cellphone described below, I know that this occurred on or about November 2, 2013. Minor Victim-3 identified multiple photographs of herself found on CC-1's Cellphone and other electronic devices, including two in which she is pictured kneeling on a bed ("Minor Victim-3 Photograph-1" and "Minor Victim-3 Photograph-2"). The same day as the photographs were taken, CC-1 arranged for a man to come to the Davidson Avenue Apartment, where the man paid to have sex with Minor Victim-3. I showed Minor Victim-3 the SOHNGEN Photograph, among other photographs, and she stated, in substance and in part, that SOHNGEN looked like the person who had paid to have sex with her at the Davidson Avenue Apartment. Based on the date of birth on her driver's license, Minor Victim-3 was fifteen years old at the time SOHNGEN paid to have sex with her.

14. I have reviewed the contents of CC-1's Cellphone, including its text message history, and I have observed the following, among other things, in substance and in part:

a. CC-1's Cellphone Entry for Moss, described above, listed a particular phone number for "Moss" beginning with the area code "347" (the "347 Phone Number") and a particular email address for "Moss" (the "Moss Gmail Account"). It also included the note "2000."

b. On or about August 2, 2013, CC-1's Phone received a text message from a particular phone number with a "917" area code (the "917 Phone Number"), which said, in sum and substance, "Hi its [347 Phone Number]. Cant use this phone. Can u email [the Moss Gmail Account]?"

c. Between on or about August 17, 2013 and on or about November 2, 2013, the 347 Phone Number and CC-1's Phone exchanged numerous text messages relating to SOHNGEN's and CC-1's efforts to arrange and negotiate payment for sexual encounters between SOHNGEN and girls under the age of 18,

including the following text messages, in substance and in part (the "Moss Text Messages"):

i. Beginning on or about August 17, 2013:

|                     |         |                      |
|---------------------|---------|----------------------|
| 8/17/13<br>6:13 PM  | CC-1    | Hi                   |
| 8/17/13<br>10:39 PM | SOHNGEN | Hi                   |
| 8/17/13<br>10:40 PM | CC-1    | It's too late        |
| 8/17/13<br>10:40 PM | SOHNGEN | For who?             |
| 8/17/13<br>10:41 PM | CC-1    | The 41               |
| 8/17/13<br>10:41 PM | SOHNGEN | She actually exists? |
| 8/17/13<br>10:42 PM | CC-1    | Yes                  |
| 8/17/13<br>10:42 PM | CC-1    | Not the sane one     |
| 8/17/13<br>10:42 PM | SOHNGEN | Never saw a pic...   |
| 8/17/13<br>10:44 PM | CC-1    | I know.              |

Based on my training and experience, as well as the context and content of the messages transcribed herein and other information I have learned in the course of this investigation, it appears that SOHNGEN and CC-1 used coded language in their text messages, whereby they inverted the order of the numbers in girls' ages. For example, a twelve-year-old girl would be "21," and an eight-year-old girl would be "80."<sup>2</sup> Accordingly, it appears that in this exchange, CC-1 told SOHNGEN, in substance

---

<sup>2</sup> This understanding appears to be supported by the fact that SOHNGEN and CC-1 discuss girls being at "chuck e cheese," see *infra* ¶ 14(c)(iv), which I believe to be a reference to the Chuck E. Cheese's children's restaurant and arcade. Moreover, in one of the September 7, 2013 messages transcribed below, see *infra* ¶ 14(c)(iii), CC-1 refers to "11," and SOHNGEN later responds by mentioning "Ii." This appears to be an instance in which the code broke down because "11" cannot be inverted. Nevertheless, SOHNGEN appears to have attempted to obscure the true meaning of their conversation by using letters instead of numbers.



and in part, that it was too late for SOHNGEN to purchase sex with a fourteen-year-old girl ("[t]he 41").

ii. Beginning on or about August 21, 2013:

|                     |         |                                    |
|---------------------|---------|------------------------------------|
| 8/21/13<br>4:54 PM  | CC-1    | Hi.                                |
| 8/21/13<br>4:54 PM  | CC-1    | Are you busy                       |
| 8/21/13<br>10:42 PM | SOHNGEN | Why?                               |
| 8/21/13<br>11:33 PM | CC-1    | I had something for you. Too late  |
| 8/21/13<br>11:36 PM | SOHNGEN | What?                              |
| 8/22/13<br>10:04 AM | CC-1    | It's too late. She had to go home. |

Based on my training and experience, as well as the context and content of the messages, it appears that in this exchange, CC-1 told SOHNGEN, in substance and in part, about a girl who SOHNGEN could purchase for sex (*i.e.*, "something for you"), but who "had to go home" before SOHNGEN replied.

iii. Beginning on or about September 7, 2013:

|                    |         |   |
|--------------------|---------|---|
| 9/7/13<br>1:16 AM  | CC-1    | 21 for you.   |
| 9/7/13<br>2:16 AM  | CC-1    | 11. Too   |
| 9/7/13<br>7:13 AM  | SOHNGEN | For real?   |
| 9/7/13<br>12:41 PM | CC-1    | Yes.  |
| 9/7/13<br>12:49 PM | CC-1    | But you have to come right away you we say. They are two. |
| 9/7/13<br>3:06 PM  | CC-1    | Don't have a lot of time.                                 |
| 9/7/13<br>9:26 PM  | SOHNGEN | Don't know when u sent this. Phone was off.               |
| 9/7/13<br>9:26 PM  | CC-1    | It's too late. But we can make a new time.                |
| 9/7/13<br>9:27 PM  | SOHNGEN | How much?   |
| 9/7/13<br>9:27 PM  | CC-1    | Which on.   |

|                   |         |  |
|-------------------|---------|--|
| 9/7/13<br>9:28 PM | CC-1    | Which one                                      |
| 9/7/13<br>9:28 PM | SOHNGEN | Ii   |
| 9/7/13<br>9:29 PM | CC-1    | 3000.  |
| 9/7/13<br>9:30 PM | SOHNGEN | I think we had that discussion before...       |
| 9/7/13<br>7:03 PM | CC-1    | Wait until you see the pic.                    |
| 9/7/13<br>9:56 PM | SOHNGEN | Ok...  |
| 9/8/13<br>7:34 PM | SOHNGEN | Hi   |
| 9/8/13<br>8:20 PM | CC-1    | Hi   |
| 9/8/13<br>8:24 PM | SOHNGEN | So. That's pretty steep                        |
| 9/8/13<br>8:26 PM | CC-1    | Ii is a lot and its really cute                |
| 9/8/13<br>8:28 PM | SOHNGEN | Haven't won the lottery to my information. . . |
| 9/8/13<br>8:37 PM | SOHNGEN | Pic?   |
| 9/8/13<br>8:40 PM | CC-1    | I don't have them yet                          |

Based on my training and experience, as well as the context and content of the messages, it appears that in this exchange, CC-1 told SOHNGEN, in substance and in part, that CC-1 had twelve-year-old and eleven-year-old girls that SOHNGEN could purchase for sex ("21 for you. 11. Too"), if he could get to them quickly ("you have to come right away . . . . Don't have a lot of time."). SOHNGEN responded, in sum and substance, that he had not received the message promptly because his "[p]hone was off." CC-1 then stated that they could "make a new time," and SOHNGEN began to negotiate the price for the eleven-year-old girl ("Minor Victim-4"). CC-1 said that it would cost "3000," which refers to \$3,000. SOHNGEN responded, in substance and in part, that the price was too high ("That's pretty steep"), and CC-1 assured SOHNGEN that Minor Victim-4 was "really cute." SOHNGEN then asked for a picture of Minor Victim-4.

iv. Beginning on or about October 15, 2013:

|                        |         |   |
|------------------------|---------|---|
| 10/15/2013<br>9:15 PM  | CC-1    | Hey   |
| 10/18/2013<br>11:03 AM | SOHNGEN | Who's this?   |
| 10/18/2013<br>11:04 AM | CC-1    | Your friends on davidson ave.                                       |
| 10/18/2013<br>11:04 AM | CC-1    | I found a 80 and 31   |
| 10/18/2013<br>11:05 AM | CC-1    | No joke.  |
| 10/18/2013<br>11:06 AM | SOHNGEN | Ok  |
| 10/18/2013<br>11:07 AM | SOHNGEN | Tell  |
| 10/18/2013<br>11:10 AM | CC-1    | The only this is we cant use<br>the place on davidson. Any<br>ideas |
| 10/18/2013<br>11:12 AM | SOHNGEN | How much?   |
| 10/18/2013<br>11:13 AM | CC-1    | What good for the 80  |
| 10/18/2013<br>11:14 AM | SOHNGEN | 800   |
| 10/18/2013<br>11:14 AM | CC-1    | :(  |
| 10/18/2013<br>11:18 AM | CC-1    | I thought 2000 was ok.  |
| 10/18/2013<br>11:21 AM | CC-1    | How about both for that.  |
| 10/18/2013<br>11:22 AM | CC-1    | You cant have sex with 80. You<br>get Head and you can eat          |
| 10/18/2013<br>11:24 AM | SOHNGEN | No. Meet me in the middle   |
| 10/18/2013<br>11:24 AM | SOHNGEN | Eat is fine   |
| 10/18/2013<br>11:24 AM | CC-1    | But you can with 31   |
| 10/18/2013<br>11:24 AM | CC-1    | Do you want both.   |
| 10/18/2013<br>11:25 AM | CC-1    | Both for 1600   |
| 10/18/2013<br>11:25 AM | CC-1    | Do you have a place   |

|                        |         |  |
|------------------------|---------|--|
| 10/18/2013<br>11:31 AM | CC-1    | We cant bring the 80 to davidson   |
| 10/18/2013<br>11:32 AM | SOHNGEN | Not necessarily  |
| 10/18/2013<br>11:32 AM | SOHNGEN | Can't do it there  |
| 10/18/2013<br>11:32 AM | SOHNGEN | I understand. No wheelchair access   |
| 10/18/2013<br>11:37 AM | CC-1    | Ok. Hotel  |
| 10/18/2013<br>11:39 AM | SOHNGEN | Sure. But how get her in?  |
| 10/18/2013<br>11:40 AM | CC-1    | Do you drive? Im look for a place with an outside room door. Or maybe you know one already |
| 10/18/2013<br>11:41 AM | SOHNGEN | I drive  |
| 10/18/2013<br>11:42 AM | CC-1    | Great.   |
| 10/18/2013<br>11:42 AM | SOHNGEN | When   |
| 10/18/2013<br>11:43 AM | CC-1    | Let me get them.   |
| 10/18/2013<br>11:43 AM | CC-1    | You want both?   |
| 10/18/2013<br>11:44 AM | SOHNGEN | Ok. When   |
| 10/18/2013<br>11:50 AM | SOHNGEN | Where  |
| 10/18/2013<br>11:50 AM | CC-1    | Hold on. Brb   |
| 10/18/2013<br>11:55 AM | CC-1    | She is the other girl is getting them  |
| 10/18/2013<br>12:01 PM | CC-1    | They are in school. After school   |
| 10/18/2013<br>12:03 PM | CC-1    | Can you look up a hotel  |
| 10/18/2013<br>12:08 PM | SOHNGEN | Can't do that late. Would have to be now. Need about 30 to get to bx                       |
| 10/18/2013<br>12:10 PM | SOHNGEN | I know a hotel but she needs to dress  |
| 10/18/2013<br>12:10 PM | CC-1    | Dress how.   |

|                        |         |  |
|------------------------|---------|--|
| 10/18/2013<br>12:11 PM | SOHNGEN | Old  |
| 10/18/2013<br>12:11 PM | CC-1    | No tits. Lol   |
| 10/18/2013<br>12:11 PM | CC-1    | She is small.  |
| 10/18/2013<br>12:12 PM | CC-1    | What the name of the hotel   |
| 10/18/2013<br>12:12 PM | SOHNGEN | I mean for getting in<br>inconspicuously   |
| 10/18/2013<br>12:12 PM | CC-1    | They going   |
| 10/18/2013<br>12:13 PM | CC-1    | What the name of the hotel   |
| 10/18/2013<br>12:24 PM | SOHNGEN | [Hotel-1]  |
| 10/18/2013<br>12:25 PM | CC-1    | Where is that. I want to look<br>it up   |
| 10/18/2013<br>12:26 PM | SOHNGEN | [Location of Hotel-1 in the<br>Bronx, New York]  |
| 10/18/2013<br>12:34 PM | CC-1    | Ok   |
| 10/18/2013<br>12:37 PM | CC-1    | Thats great. They have the<br>outside doors. Let them sit in<br>the car while you get the room.                |
| 10/18/2013<br>12:37 PM | CC-1    | Then park in front of the door.  |
| 10/18/2013<br>12:38 PM | CC-1    | When your done. Can you drop<br>them off at chuck e cheese.<br>That where the family thinks<br>they are going. |
| 10/18/2013<br>12:39 PM | SOHNGEN | Which chucks chs?  |
| 10/18/2013<br>12:40 PM | CC-1    | Harlem   |
| 10/18/2013<br>12:41 PM | SOHNGEN | Where do I pick them up?   |
| 10/18/2013<br>12:42 PM | CC-1    | Not sure yet. Cant let anyone<br>see them get into a car   |
| 10/18/2013<br>12:43 PM | SOHNGEN | When   |
| 10/18/2013<br>12:43 PM | CC-1    | After your done  |
| 10/18/2013<br>12:44 PM | SOHNGEN | I'm driving now  |

|                        |         |  |
|------------------------|---------|--|
| 10/18/2013<br>12:44 PM | CC-1    | How about at the chuck e cheese  |
| 10/18/2013<br>12:45 PM | CC-1    | They still in school   |
| 10/18/2013<br>12:46 PM | SOHNGEN | Till when  |
| 10/18/2013<br>12:46 PM | CC-1    | 430  |
| 10/18/2013<br>12:47 PM | CC-1    | They don't know they ate going yet.  |
| 10/18/2013<br>12:47 PM | SOHNGEN | Not gonna work today...  |
| 10/18/2013<br>12:48 PM | CC-1    | It can if you still can  |
| 10/18/2013<br>12:49 PM | SOHNGEN | Has to be much earlier   |
| 10/18/2013<br>12:49 PM | CC-1    | What time  |
| 10/18/2013<br>12:49 PM | SOHNGEN | I can pick them up in 30-40 min  |
| 10/18/2013<br>12:59 PM | CC-1    | They are still in school.  |
| 10/18/2013<br>12:59 PM | CC-1    | Hold up. Brb   |
| 10/18/2013<br>1:11 PM  | CC-1    | We might have to make it on saturday.  |
| 10/18/2013<br>1:13 PM  | SOHNGEN | What time?   |
| 10/18/2013<br>1:13 PM  | CC-1    | What time is good for you.   |
| 10/18/2013<br>1:15 PM  | SOHNGEN | Also. Aren't ppl gonna miss them?  |
| 10/18/2013<br>1:15 PM  | CC-1    | That's why the 16 is tell ppl they are going to chuch E cheese.                                    |
| 10/18/2013<br>1:16 PM  | SOHNGEN | After 5  |
| 10/18/2013<br>1:16 PM  | SOHNGEN | And how would they be there that long without supervision  |
| 10/18/2013<br>1:17 PM  | CC-1    | The 61 is gong to take others to chuck. Where you are going to pick up from. And bring back there. |
| 10/18/2013<br>1:18 PM  | CC-1    | Thats covered. They are not going in. They are going to be out front.                              |

|                       |         |  |
|-----------------------|---------|--|
| 10/18/2013<br>1:18 PM | CC-1    | But you have to bring them back there. That's important. |
| 10/18/2013<br>1:25 PM | SOHNGEN | Ok   |
| 10/18/2013<br>1:25 PM | SOHNGEN | Pics?  |
| 10/18/2013<br>1:29 PM | CC-1    | Nope   |
| 10/18/2013<br>1:29 PM | CC-1    | It's good tho  |

Based on my training and experience, as well as the context and content of the messages, it appears that in this exchange, CC-1 identified himself as one of SOHNGEN's "friends on Davidson ave.," which I believe to be a reference to CC-1's Davidson Avenue Apartment, where CC-1's clients often engaged in sex acts with girls working for CC-1. CC-1 then said, in substance and in part, that he "found a 80 and 31," which, as explained above, I believe to refer to an eight-year old girl ("Minor Victim-5") and a thirteen-year-old girl ("Minor Victim-6"). SOHNGEN responded with an offer of "800," meaning \$800. CC-1 replied, in substance and in part, with a counter-offer: "I thought 2000 was ok." CC-1 then cautioned SOHNGEN, in substance and in part, that he cannot have sex with Minor Victim-5, but can "get Head" and "can eat," which I understand to be references to oral sex. SOHNGEN responded, in substance and in part, "Eat is fine." CC-1 also stated, in substance and in part, that SOHNGEN could have sex with Minor Victim-6 ("But you can [have sex] with 31."). CC-1 and SOHNGEN then continued their negotiation of a price and discussed logistics regarding possible locations (e.g., "cant bring the 80 to Davidson," "Im look for a place with an outside room door," "That [proposed location is] great. They have the outside doors. Let them sit in the car while you get the room."). CC-1 also said to SOHNGEN, in substance and in part: "When your done. Can you drop them off at chuck e cheese. That where the family thinks they are going." Based on the context, it appears that this means that Minor Victim-5 and Minor Victim-6's relatives believed they would be at a Chuck E. Cheese's children's restaurant when, in fact, SOHNGEN would be engaged in sexual acts with them at a nearby hotel. Finally, during this exchange, CC-1 referenced a sixteen-year-old he was using to help procure the younger girls, and in one message, it appears that CC-1 briefly failed to use the usual code, referring to "the 16" who was "tell[ing] ppl they are going to chuch E cheese." In his next message, CC-1 returned to calling that person "[t]he 61."

v. Beginning on or about October 19, 2013:

|                       |         |   |
|-----------------------|---------|---|
| 10/19/2013<br>1:42 PM | CC-1    | Im still working on iy  |
| 10/19/2013<br>2:11 PM | SOHNGEN | K   |
| 10/19/2013<br>2:13 PM | CC-1    | It got alittle hared. 80 is hard to get out. 31 might. Let me work on it. Its hard work. Just be ready. |
| 10/19/2013<br>6:02 PM | SOHNGEN | Ok...   |
| 10/19/2013<br>6:04 PM | CC-1    | I might be able to get the 31 tonight only  |
| 10/19/2013<br>6:05 PM | SOHNGEN | How much?   |
| 10/19/2013<br>6:09 PM | CC-1    | What good for you. I was good for you.  |
| 10/19/2013<br>6:11 PM | SOHNGEN | So what happened to 80?   |
| 10/19/2013<br>6:11 PM | CC-1    | Cant get 80 alone   |
| 10/19/2013<br>6:12 PM | SOHNGEN | So bring them together  |
| 10/19/2013<br>6:13 PM | CC-1    | That cant work.   |
| 10/19/2013<br>6:13 PM | SOHNGEN | What happened   |
| 10/19/2013<br>6:20 PM | SOHNGEN | ?   |
| 10/19/2013<br>6:29 PM | CC-1    | Nothing. Its always been like that. I text when they were here but it was hard ti get you.              |
| 10/19/2013<br>6:30 PM | CC-1    | Now the 31 is saying no.  |
| 10/19/2013<br>6:30 PM | SOHNGEN | Hm  |
| 10/19/2013<br>6:32 PM | CC-1    | Yeah.   |
| 10/19/2013<br>6:33 PM | SOHNGEN | I was ready to come yesterday and today   |
| 10/19/2013<br>6:33 PM | CC-1    | I think i might be able to get the 80 only. Stiil not sure.   |
| 10/19/2013<br>6:34 PM | CC-1    | Yeah, but they where here last week. Do worry. Im going to keep trying.                                 |



|                       |         |  |
|-----------------------|---------|--|
| 10/19/2013<br>6:35 PM | SOHNGEN | I thought they can't be on davidson  |
| 10/19/2013<br>6:37 PM | CC-1    | No. They don't live around here.   |
| 10/19/2013<br>6:38 PM | SOHNGEN | But u said they were there..   |
| 10/19/2013<br>6:39 PM | CC-1    | That was last week.  |
| 10/19/2013<br>6:40 PM | SOHNGEN | The 80 experienced?  |
| 10/19/2013<br>6:40 PM | CC-1    | When they was here. We could bot donit here because they can ot come out in the day. I do not want people to see you come in in the day. Night is good. Day time is bad. |
| 10/19/2013<br>6:41 PM | CC-1    | Or we can wait them them to have a sleep over here. But i dint know when.  |
| 10/19/2013<br>6:42 PM | SOHNGEN | The 80 has done it before?   |
| 10/19/2013<br>6:53 PM | CC-1    | Nope   |
| 10/19/2013<br>6:53 PM | CC-1    | But she will. Its just getting her out   |
| 10/19/2013<br>6:54 PM | SOHNGEN | So nothing tonite. Right?  |
| 10/19/2013<br>6:55 PM | CC-1    | Im not sure. If it is. Its going to be last minute.  |
| 10/19/2013<br>7:28 PM | CC-1    | Ok. The 61 when to see if she can get them. But still not sure   |
| 10/19/2013<br>7:29 PM | SOHNGEN | K  |
| 10/19/2013<br>7:39 PM | CC-1    | The plan is for you to pick them you by the post office on 149th in the bx. That's only if they come out.  |
| 10/19/2013<br>7:41 PM | SOHNGEN | But it's late. Nobody gonna miss them?   |
| 10/19/2013<br>7:43 PM | CC-1    | No. Not tonight. Dint worry about anything   |
| 10/19/2013<br>7:43 PM | SOHNGEN | So when?   |
| 10/19/2013<br>9:02 PM | SOHNGEN | ?  |

