

1 UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA  
VALDOSTA DIVISION

2 UNITED STATES OF AMERICA	)	INDICTMENT NO. 7:15-CR-_____ (HL)
	)	<u>UNDER SEAL</u>
v.	)	3
	)	VIOLATIONS:
(1) JOSE ROBERTO LAINES	)	18 U.S.C. § 1594
<b>A/K/A “EL VIEJON,”</b>	)	18 U.S.C. § 1591
(2) GALDINO BENITEZ,	)	Conspiracy to Engage in Sex Trafficking
(3) CARMEN MICHELLE PECINA,	)	
(4) YAMILETH HERNANDEZ	)	18 U.S.C. § 371
<b>A/K/A “GABBY,”</b>	)	
(5) MARIA MERCADO	)	18 U.S.C. § 2241
A/K/A “MARISOL,”	)	Conspiracy to Travel in Interstate
(6) HERIBERTA CARABALLO	)	Commerce for Purposes of
<b>A/K/A “CHRISTINA” A/K/A</b>	)	Prostitution
<b>“LA COLOMBIANA;”</b>	)	
(7) JUAN ORTIZ BOJORQUEZ,	)	18 U.S.C. § 1952
(8) JUAN JOSE SOTELO A/K/A “DON JOSE,”	)	Use of a Facility in Interstate Commerce
(9) ANTONIO FLORES ESPARZA	)	to Promote the Carrying on of a
<b>A/K/A “TONIO,”</b>	)	Business involving Prostitution
(10) JOSE TRUJILLO A/K/A “EL GORDO,”	)	
(11) GERMANIA GUZMAN CRUZ	)	
<b>A/K/A “DEBORAH,”</b>	)	
(12) FLOR TORRES,	)	
(13) UVALDO PEREZ,	)	
(14) JOHN MCLEOD,	)	
(15) JUAN GOMEZ,	)	
(16) EVELYN PATRICIA YANES	)	
A/K/A “PATTY,”	)	
(17) ARNOLD CAMPBELL,	)	
(18) CECILIA GASPAR REYES	)	
A/K/A “MARIANA” A/K/A “DULCE,”	)	
(19) LETI LNU,	)	
(20) ALEJANDRO MONTERREY,	)	
(21) EFREN ERASMO LOPEZ A/K/A “GORDO”	)	
A/K/A “PUMA,”	)	
(22) CARLOS PEREZ A/K/A “CHEMA,”	)	
(23) BERNABE CARBAJAL A/K/A	)	
“EL CHAPARRO,”	)	
(24) GLORIA ISABEL REYES	)	
A/K/A ESTELA REYES	)	
A/K/A GLORIA DOMINGUEZ	)	
A/K/A “DONA GLORIA,”	)	
(25) MILTON IVAN DOMINGUEZ,	)	
(26) FNU LNU A/K/A “EL PITUFO,”	)	
(27) LUIS ROBERTO DOMINGUEZ,	)	
(28) MARTHA CECILIA BUSTOS TOVAR,	)	
(29) AMADA GARCIA A/K/A “MARLENE,”	)	
(30) JAIME RAMIREZ VILLEDA,	)	

- (31) ERNESTO TREJOS VILLEDA, )
- (32) ALBA BLANDON A/K/A “DONA ALBA,” )
- (33) DIOMARIS CUEVAS A/K/A “MARI,” )
- (34) GEORGE ANSELMO CANELA )
- ALVARADO A/K/A “CHEMO,” )
- (35) LUZ GUADALUPE ORTIZ A/K/A “LA )
- FLACA” A/KA “NATALIA,” )
- (36) PEDRO ALBERTO LNU, )
- (37) JOHAN GOMEZ BLANDON, )
- (38) MAURO LIRA A/K/A “CHINO” )

**COUNT ONE**

***Conspiracy to Engage in Sex Trafficking of a Minor Under the Age of 18***  
***18 U.S.C. § § 1594 i/c/w 1591***

1. Beginning at a time unknown to the Grand Jury, but at least from on or about 2006 and continuing through May 21, 2011, in Houston County, Georgia and elsewhere within the jurisdiction of the Middle District of Georgia, and elsewhere,

- (23) BERNABE CARBAJAL A/K/A “EL CHAPARRO,”
- (24) GLORIA ISABEL REYES A/K/A ESTELA REYES A/KA GLORIA DOMINGUEZ A/K/A “DONA GLORIA,”
- (25) MILTON IVAN DOMINGUEZ,
- (26) FNU LNU A/K/A “EL PITUFO,”
- (36) PEDRO ALBERTO LNU and
- (34) GEORGE ANSELMO CANELA ALVARADO A/K/A “CHEMO,”

Defendants herein, being aided and abetted by each other, and by Juan Carlos Pena (not indicted herein) and by others both known and unknown to the Grand Jury, did knowingly combine, conspire, confederate and agree with each other and others to knowingly and intentionally recruit, entice, harbor, transport, provide and obtain by any means a minor, to-wit: F.L. whose identity is known to the Grand Jury and who had attained the age of fourteen (14) but had not attained the age of eighteen (18) and affecting interstate and foreign commerce, and did benefit financially and by receiving a thing a of value from participation in a venture engaged in such acts, knowing and in reckless disregard of the fact that F.L., a minor, would be caused to engage in a commercial sex act, in violation of Title 18, United States Code Section 1591(a)(1), 1591 (a)(2), and 1591(b)(2).

**Manner and Means of the Conspiracy**

- 2. It was part of the conspiracy for one or more members of the conspiracy:
  - a. To coordinate the transportation of F.L., a minor, to Warner Robins, Georgia and elsewhere for the purpose of engaging in prostitution in Warner Robins, Georgia and elsewhere;

- b. To recruit and entice young females to work as prostitutes for the organization as minors and young females fetched higher prices from customers;
- c. To harbor F.L., a minor, by providing food and housing while she worked as a prostitute;
- d. To use communication facilities including cellular telephones to communicate with other members of the conspiracy about transportation of the minor, F.L., and coordinate meetings between the minor, F.L., and the people who would pay for sex, referred herein after as “Johns” and customers;
- e. To transport the minor, F.L., to various locations in the Middle District of Georgia and elsewhere, for the minor to engage in sexual activity with “Johns” (customers). At times during the conspiracy, the minor would commit over 25 acts of prostitution in one day and on weekends over 30 acts of prostitution in one day, at the direction of one or more members of the conspiracy;
- f. To accompany the minor, F.L., to “out-call” locations where the minor, F.L., would engage in sexual acts with “Johns” (customers);
- g. To collect payment for sexual services provided by the minor, F.L., from the “Johns” (customers);
- h. To trade the minor, F.L., and exchange her with other women often after one week to conspirators in other jurisdictions including the states of Alabama, Mississippi, Louisiana and elsewhere.

### **Object of the Conspiracy**

- 3. It was the object of the conspiracy to make money by engaging in sex trafficking and interstate prostitution.

### **Overt Acts**

- 4. In furtherance of the conspiracy, and to accomplish the objects thereof, at least one of the conspirators committed or caused to be committed at least one of the following overt acts, among others in the Middle District of Georgia and elsewhere:
  - a. Beginning at a time unknown to the Grand Jury, but between 2006 and May 21, 2011, **(36) PEDRO ALBERTO LNU** enticed a Mexican minor, F.L., to run away from her home in Atlanta, Georgia, under false pretenses that they would be in a romantic relationship and there would be a better life for the minor, F.L. **(36) PEDRO ALBERTO LNU** instead trained the minor, F.L., to become a prostitute, working for him as her “Padrote.”
  - b. **(36) PEDRO ALBERTO LNU**, after “training” the minor, F.L., as a prostitute, would send her with delivery drivers to various cities in the Southeast to work as a prostitute.
  - c. Between 2006 and May 21, 2011, the minor, F.L., was transported to the Middle District of Georgia to work as a prostitute for Juan Carlos Pena (not indicted herein) in Warner Robins and Macon, Georgia.
  - d. Between 2006 and May 21, 2011, the minor, F.L., was transported to a brothel in Florida on at least three (3) occasions.

- e. In 2010, the date unknown to the Grand Jury, the minor, F.L., was taken to work at a brothel in Birmingham, Alabama to work for **(23) BERNABE CARBAJAL A/K/A “EL CHAPARRO.”**
- f. Between 2010 and May 2011, the minor, F.L., worked as a prostitute for **(24) GLORIA ISABEL REYES A/K/A/ ESTELA REYES A/K/A GLORIA DOMINGUEZ A/K/A “DONA GLORIA”** and **(25) MILTON IVAN DOMINGUEZ** who were the Duenos (owners) of the brothel in Mississippi. They referred to “tickets” as the cost of having sex with F.L. a minor.
- g. **(24) GLORIA ISABEL REYES A/K/A/ ESTELA REYES A/K/A GLORIA DOMINGUEZ A/K/A “DONA GLORIA”** and **(25) MILTON IVAN DOMINGUEZ** used communications devices, including cellular phones, to report to **(36) PEDRO ALBERTO LNU** how many “tickets” F.L. had made that day.
- h. In between January and May 21, 2011 F.L. was also transported to work as a prostitute in Mississippi to a brothel ran by a Dueno (owner) known only as **(26) “EL PITUFO”**, who was friends with **(25) MILTON IVAN DOMIGUEZ.**
- i. Between 2010 and May 21, 2011, the minor, F.L., was also transported to work as a prostitute in Mississippi at a brothel run by **(34) GEORGE ANSELMO CANELA ALVARADO A/K/A “CHEMO.”** F.L. and another prostitute of unknown age were delivered to “customers” at different locations for sexual acts as well as “customers” coming to the brothel to engage in sexual acts with F.L. During the times F.L. worked for **(34) GEORGE ANSELMO CANELA ALVARADO A/K/A “CHEMO,”** she was expected to have intercourse with thirty (30) “customers” on weekdays and seventy (70) “customers” on the weekends.
- j. The minor, F.L., worked for at least one week at the time with each of the above described Defendants. F.L. was exchanged after one week and taken to another brothel to continue working as a prostitute.

**COUNT TWO**  
***Conspiracy to Transport a Person in Interstate Commerce  
for Purposes of Prostitution***  
**18 U.S.C. §§ 371 & 2421**

The allegations contained in paragraphs 1 through 4 of the Indictment are hereby realleged and incorporated by reference as if fully set forth herein.

5. Beginning at a time unknown to the grand jury, but at least from on or about January 1, 2005 and continuing through September 30, 2015, in Colquitt County, within the Middle District of Georgia, and elsewhere,

**(1) JOSE ROBERTO LAINES A/K/A “EL VIEJON,”**  
**(2) GALDINO BENITEZ,**

- (3) CARMEN MICHELLE PECINA,  
(4) YAMILETH HERNANDEZ A/K/A "GABBY,"  
(5) MARIA MERCADO A/K/A "MARISOL,"  
(6) HERIBERTA CARABALLO A/K/A "CHRISTINA" A/K/A "LA COLOMBIANA,"  
(7) JUAN ORTIZ BOJORQUEZ,  
(8) JUAN JOSE SOTELO A/K/A "DON JOSE,"  
(9) ANTONIO FLORES ESPARZA A/K/A "TONIO,"  
(10) JOSE TRUJILLO A/K/A "EL GORDO,"  
(11) GERMANIA GUZMAN CRUZ A/K/A "DEBORAH,"  
(12) FLOR TORRES,  
(13) UVALDO PEREZ,  
(14) JOHN MCLEOD,  
(15) JUAN GOMEZ,  
(16) EVELYN PATRICIA YANES A/K/A "PATTY,"  
(17) ARNOLD CAMPBELL,  
(18) CECILIA GASPAR REYES A/K/A "MARIANA" A/K/A "DULCE,"  
(19) LETI LNU,  
(20) ALEJANDRO MONTERREY,  
(21) EFREN ERASMO LOPEZ A/K/A "GORDO" A/K/A "PUMA,"  
(22) CARLOS PEREZ A/K/A "CHEMA,"  
(23) BERNABE CARBAJAL A/K/A "EL CHAPARRO,"  
(24) GLORIA ISABEL REYES A/K/A ESTELA REYES AKA GLORIA DOMINGUEZ A/K/A  
"DONA GLORIA,"  
(25) MILTON IVAN DOMINGUEZ,  
(26) FNU LNU A/K/A "EL PITUFO,"  
(27) LUIS ROBERTO DOMINGUEZ,  
(28) MARTHA CECILIA BUSTOS TOVAR,  
(29) AMADA GARCIA A/K/A "MARLENE,"  
(30) JAIME RAMIREZ VILLEDA,  
(31) ERNESTO TREJOS VILLEDA,  
(32) ALBA BLANDON A/K/A "DONA ALBA,"  
(33) DIOMARIS CUEVAS A/K/A "MARI,"  
(34) GEORGE ANSELMO CANELA ALVARADO A/K/A "CHEMO,"  
(35) LUZ GUADALUPE ORTIZ A/K/A "LA FLACA" A/K/A "NATALIA,"  
(36) PEDRO ALBERTO LNU,  
(37) JOHAN GOMEZ BLANDON, and  
(38) MAURO LIRA A/K/A "CHINO,"

Defendants herein, aided and abetted by others, did willfully and knowingly combine, conspire, confederate, and agree with each other and other individuals, known and unknown to the Grand Jury, to commit certain offenses against the United States, that is, travel in interstate commerce for purposes of prostitution, in violation of Title 18, United States Code, Section 2421.

#### **Manner and Means of the Conspiracy**

6. It was part of the conspiracy for one or more members of the conspiracy:

- a. To coordinate the transportation of women who had entered the United States illegally to Moultrie, Georgia, and elsewhere for the purpose of engaging in prostitution in the Moultrie, Georgia area and elsewhere;
- b. To transport these women to and from Moultrie, Georgia and elsewhere to cause these women to engage in prostitution in the Moultrie, Georgia area and elsewhere;
- c. To harbor these women in various residences in the area, including but not limited to 162 Dogwood Circle in Moultrie, Georgia;
- d. To engage in sexual activities with these women in the area of Moultrie, Georgia and Warner Robins, Georgia and elsewhere;
- e. To assist and attempt to procure and recruit women to engage in prostitution in the area of Moultrie, Georgia and Warner Robins, Georgia and elsewhere.

### **Object of the Conspiracy**

7. It was the object of the conspiracy to make money by engaging in sex trafficking and interstate prostitution.

### **Overt Acts**

8. In furtherance of the conspiracy, and to accomplish the objects thereof, at least one of the conspirators committed or caused to be committed at least one of the following overt acts, among others, in the Middle District of Georgia and elsewhere:

- a. In 2006, the exact date being unknown to the Grand Jury, **(36) PEDRO ALBERTO LNU** met a Mexican minor, F.L. (herein after F.L.), an individual known to the Grand Jury. He enticed her to run away with him and trained her to become a prostitute. From 2006 through May 21, 2011, F.L. was transported across state lines to work as a prostitute from Georgia to Florida, Alabama, Mississippi, Louisiana and elsewhere.
- b. On or about May 2011, after F.L. turned eighteen (18) years old and until January 2013, F.L. was sent to work as a prostitute at various brothels located in Warner Robins, Georgia, Florida, Louisiana, Mississippi, Alabama and elsewhere by **(36) PEDRO ALBERTO LNU** and others.
- c. After May, 2011 until January 2013, the exact date being unknown to the Grand Jury, F.L. was transported across states to work as prostitute for **(26) FNU LNU A/K/A "EL PITUFO"** in Mississippi.
- d. On or about January 2012 but before February 19, 2015, the exact date being unknown to the Grand Jury, **(34) GEORGE ANSELMO CANELA ALVARADO A/K/A "CHEMO"** and others both known and unknown to the Grand Jury lured A.M., an individual known to the Grand Jury, to cross the United States border illegally under the false pretense of a waitressing job. After arriving in the United States, A.M. travelled to Georgia. From

- Georgia A.M. was transported to Mississippi and was informed that “CHEMO” would contact her with information about her job. **(34) GEORGE ANSELMO CANELA ALVARADO A/K/A “CHEMO”** contacted A.M. and told A.M. she would work as a prostitute to pay back her smuggling fee.
- e. From January 2012 until February 2015, **(34) GEORGE ANSELMO CANELA ALVARADO A/K/A “CHEMO”** and others transported and caused A.M. to travel to Texas, Mississippi, Louisiana and elsewhere for the purpose of A.M. engaging in prostitution.
- f. In 2014, the exact date unknown to the Grand Jury, A.M. worked as prostitute in Mississippi for **(24) GLORIA ISABEL REYES A/K/A/ ESTELA REYES A/K/A GLORIA DOMINGUEZ A/K/A “DONA GLORIA”** and her son, **(25) MILTON IVAN DOMINGUEZ**.
- g. In February 2015, A.M. was sent to work as a prostitute to New Orleans, Louisiana by **(34) GEORGE ANSELMO CANELA ALVARADO A/K/A “CHEMO.”** A.M. worked at the brothel for one week. At the end of the week, A.M. was picked up by **(28) MARTHA CECILIA BUSTOS TOVAR** and transported to Houma, Louisiana. **(28) MARTHA CECILIA BUSTOS TOVAR** made the arrangements with the “customers,” delivered A.M. to various out-calls and provided condoms for A.M. to work as a prostitute. While in Houma, Louisiana, A.M. resided with **(28) MARTHA CECILIA BUSTOS TOVAR**. **(28) MARTHA CECILIA BUSTOS TOVAR** received monetary compensation for her role in the conspiracy.
- h. On February 19, 2015, law enforcement agents arrested **(28) MARTHA CECILIA BUSTOS TOVAR** for pandering and transporting a person for prostitution. A.M. was the person being transported on that day.
- i. In 2007 and 2008, the exact dates unknown to the Grand Jury, M.R. travelled to the Valdosta, Georgia area to work as a prostitute for **(1) JOSE ROBERTO LAINES A/K/A “EL VIEJON.”** The brothel was located in a white trailer with a screened porch. **(1) JOSE ROBERTO LAINES A/K/A “EL VIEJON”** was in charge of running the brothel. **(1) JOSE ROBERTO LAINES A/K/A “EL VIEJON”** had M.R. work as a prostitute for at least one week from 11:00 A.M. to 9:00 P.M., and he charged customers thirty (30) dollars per sexual encounter. In addition to working at the brothel, M.R. was driven to several locations in the Valdosta, Georgia area to meet “Johns” (customers) and engage in sexual acts in exchange for money. At the end of the week, M.R. was sent to another brothel usually in Florida.
- j. In 2011, the exact date being unknown to the Grand Jury, M.R. went to work as a prostitute to a brothel in Gulfport, Mississippi run by **(4) YAMILETH HERNANDEZ A/K/A “GABBY.”** During this time frame, **(4)**

- YAMILETH HERNANDEZ A/K/A “GABBY”** exchanged prostitutes with “Gallo” who ran a brothel in Atlanta, Georgia. M.R. was one of the prostitutes sent to work at “Gallo’s” brothel in Atlanta, Georgia.
- k. On or about March 10, 2015, **(4) YAMILETH HERNANDEZ A/K/A “GABBY”** told M.R. that “**MARTHA**,” whom they both knew, had been arrested in Houma, Louisiana the previous week. M.R. identified **(28) MARTHA CECILIA BUSTOS TOVAR** as “**MARTHA**.” On February 19, 2015, **(28) MARTHA CECILIA BUSTOS TOVAR** was arrested in Houma, Louisiana for pandering and transporting a person for prostitution.
- l. From 2008 until 2012, the exact dates unknown to the Grand Jury, M.R. worked at a brothel in Baton Rouge run by **(32) ALBA BLANDON A/K/A “DONA ALBA.” (37) JOHAN GOMEZ BLANDON** worked for **(32) ALBA BLANDON A/K/A “DONA ALBA”** delivering prostitutes for the exchange of prostitutes and as a caretaker of the brothel. M.R. provided law enforcement a photograph M.R. had of **(32) ALBA BLANDON A/K/A “DONA ALBA.”**
- m. From June 21, 2015 to July 5, 2015, C.M., whose identity is known to the Grand Jury, travelled from Orlando, Florida to Baton Rouge, Louisiana. C.M. worked as a prostitute for **(32) ALBA BLANDON A/K/A “DONA ALBA”** and **(35) LUZ GUADALUPE ORTIZ A/K/A “LA FLACA” A/K/A “NATALIA.”**
- n. From on or about June 21 to on about June 28, 2015, C.M. worked as a prostitute in a brothel located in Kenner, Louisiana, which was operated by **(35) LUZ GUADALUPE ORTIZ A/K/A “LA FLACA” A/K/A “NATALIA”** and others. At the end of the week, **(35) LUZ GUADALUPE ORTIZ A/K/A “LA FLACA” A/K/A “NATALIA”** transported C.M. to Baton Rouge, Louisiana. C.M. was turned over to work as a prostitute for **(32) ALBA BLANDON A/K/A “DONA ALBA.”** C.M. provided sexual services to at least ten (10) to twenty (20) customers while working at the brothel. C.M. was also delivered to locations (out-calls) to engage in sexual conduct for money by **(37) JOHAN GOMEZ BLANDON.**
- o. On or about July 5, 2015, C.M. was in route to a brothel operated by **(9) ANTONIO FLORES ESPARZA A/K/A “TONIO,”** in Pensacola, Florida when C.M. was able to return to Orlando, Florida instead.
- p. On or about February 9, 2015, **(2) GALDINO BENITEZ** transported Jane Doe #1, an individual known to the Grand Jury, from Moultrie, Georgia to the state of Florida to work as a prostitute.
- q. On or about that same date, **(2) GALDINO BENITEZ** returned Jane Doe #1, to Moultrie, Georgia, from the State of Florida, to work as a prostitute for **(1) JOSE ROBERTO LAINES A/K/A “EL VIEJON.”**
- r. On or about March 11, 2015, **(4) YAMILETH HERNANDEZ A/K/A “GABBY”** travelled to the State of Louisiana to work as a prostitute for **(6) HERIBERTA CARABALLO A/K/A “CHRISTINA” A/K/A “LA COLOMBIANA.”**



- s. On or about March 16, 2015, (4) **YAMILETH HERNANDEZ A/K/A "GABBY"** travelled from the brothel of (8) **JUAN JOSE SOTELO A/K/A "DON JOSE"** in the State of Louisiana to Norcross, Georgia to the residence of (5) **MARIA MERCADO A/K/A "MARISOL"** and "Gallo," and then to Moultrie, Georgia, being transported by (3) **CARMEN MICHELLE PECINA** to work as a prostitute for (1) **JOSE ROBERTO LAINES A/K/A "EL VIEJON"** in his brothel.
- t. On or about March 24, 2015, (4) **YAMILETH HERNANDEZ A/K/A "GABBY"** travelled from Moultrie, Georgia, to the State of Florida to work as a prostitute for (9) **ANTONIO FLORES ESPARZA A/K/A "TONIO."**
- u. On or about April 2, 2015, (4) **YAMILETH HERNANDEZ A/K/A "GABBY"** travelled from the State of Florida to Houston, Texas, to work as a prostitute for (10) **JOSE TRUJILLO A/K/A "EL GORDO"** and (11) **GERMANIA GUZMAN CRUZ A/K/A "DEBORAH."**
- v. On or about April 11, 2015, (4) **YAMILETH HERNANDEZ A/K/A "GABBY"** agreed to travel from Texas to work as prostitute for (38) **MAURO LIRA A/K/A "CHINO"** in Mobile, Alabama.
- w. On or about April 19, 2015, (4) **YAMILETH HERNANDEZ A/K/A "GABBY"** travelled to Houston, Texas, to work as a prostitute for "Luis LNU" and (11) **GERMANIA GUZMAN CRUZ A/K/A "DEBORAH."**
- x. On or about April 19, 2015, (17) **ARNOLD CAMPBELL** and (16) **EVELYN PATRICIA YANES A/K/A "PATTY"** assisted (4) **YAMILETH HERNANDEZ A/K/A "GABBY"** by providing lodging and transportation to and from brothels in the Houston, Texas area.
- y. On or about April 19, 2015, (4) **YAMILETH HERNANDEZ A/K/A "GABBY"** attempted to assist (23) **BERNABE CARBAJAL A/K/A "EL CHAPARRO"** procure a woman to travel to Birmingham, Alabama to work as a prostitute.
- z. On or about May 18, 2015, (4) **YAMILETH HERNANDEZ A/K/A "GABBY"** travelled from the Moultrie, Georgia, where she was working as a prostitute for (1) **JOSE ROBERTO LAINES A/K/A "EL VIEJON,"** to the Columbia, South Carolina area to work as a prostitute for (12) **FLOR TORRES.**
- aa. On or about May 28, 2015, (5) **MARIA MERCADO A/K/A "MARISOL"** attempted to assist (1) **JOSE ROBERTO LAINES, A/K/A "EL VIEJON"** procure a woman to travel to Moultrie, Georgia to work as a prostitute.
- ab. On or about May 30, 2015, (4) **YAMILETH HERNANDEZ A/K/A "GABBY"** travelled to Myrtle Beach, South Carolina to work as a prostitute for (33) **DIOMARIS CUEVAS A/K/A "MARI."**
- ac. On or about June 8, 2015, (4) **YAMILETH HERNANDEZ A/K/A "GABBY"** arranged to work as a prostitute for (22) **CARLOS PEREZ A/K/A "CHEMA"** the following week in Atlanta.

- ad. On or about June 27, 2015, (4) **YAMILETH HERNANDEZ A/K/A “GABBY”** travelled daily to work as a prostitute for (21) **EFREN ERASMO LOPEZ A/K/A “GORDO” A/K/A “PUMA”** in Atlanta.
- ae. On or about June 30, 2015, (4) **YAMILETH HERNANDEZ A/K/A “GABBY”** attempted to assist (23) **BERNABE CARBAJAL A/K/A “EL CHAPARRO”** to procure a woman to travel to Alabama to work as a prostitute.
- af. On or about July 1, 2015, (21) **EFREN ERASMO LOPEZ A/K/A “GORDO” A/K/A “PUMA”** called (4) **YAMILETH HERNANDEZ A/K/A “GABBY”** to warn her that she and (22) **CARLOS PEREZ A/K/A “CHEMA”** were followed by the police in Atlanta and that she needed to leave the brothel.
- ag. On or about July 2, 2015, (4) **YAMILETH HERNANDEZ A/K/A “GABBY”** worked as a prostitute for (22) **CARLOS PEREZ A/K/A “CHEMA,”** in Atlanta, and they discussed the prices she was to charge customers for sexual intercourse.
- ah. On or about July 10, 2015, (4) **YAMILETH HERNANDEZ A/K/A “GABBY”** attempted to coordinate travel to Mississippi to work as a prostitute for (24) **GLORIA ISABEL REYES A/K/A ESTELA REYES A/K/A GLORIA DOMINGUEZ A/K/A “DONA GLORIA”** and (25) **MILTON IVAN DOMINGUEZ.**
- ai. Between June 2 and July 15, 2015, (38) **MAURO LIRA A/K/A “CHINO”** agreed to give a confidential informant a week to work as a prostitute for him in Mobile, Alabama.
- aj. On or about July 15, 2015, (38) **MAURO LIRA, A/K/A “CHINO”** agreed to meet the confidential informant in Mobile, Alabama to take her to his brothel for her to commence working as a prostitute.
- ak. On or about July 19 to July 25, 2015, (4) **YAMILETH HERNANDEZ A/K/A “GABBY”** travelled to North Carolina to work as a prostitute for (31) **ERNESTO TREJO VILLEDA** and (30) **JAIME RAMIREZ VILLEDA.** During the week, (30) **JAIME RAMIREZ VILLEDA** transported (4) **YAMILETH HERNANDEZ A/K/A “GABBY”** to locations to meet customers. The customers were charged to have sex with (4) **YAMILETH HERNANDEZ A/K/A “GABBY”** as set by (31) **ERNESTO TREJOS VILLEDA.**
- al. On July 20, 2015, (4) **YAMILETH HERNANDEZ A/K/A “GABBY”** called (31) **ERNESTO TREJOS VILLEDA** to complain that a client refused to pay for sexual services she provided and had mistreated her.

All done in violation of Title 18, United States Code, Sections 2241 and 371.

**COUNT THREE**

***Use of a Facility in Interstate Commerce to Promote the  
Carrying on of a Business Involving Prostitution  
18 U.S.C. § 1952***

The allegations contained in paragraphs 1 through 8 of the Indictment are hereby realleged and incorporated by reference as if fully set forth herein.

9. On or about February 26, 2015, in Colquitt County, within the Middle District of Georgia, and elsewhere,

**(13) UVALDO BARRIOZ PEREZ,**

Defendant herein, aided and abetted by other individuals, known and unknown to the Grand Jury, used a facility in interstate commerce, that is a cellular telephone, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being prostitution, which constitutes a violation of the laws of the state of Georgia, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity.

All done in violation of Title 18, United States Code, Sections 1952(a)(3)(A) and 2.

**COUNT FOUR**

***Use of a Facility in Interstate Commerce to Promote the  
Carrying on of a Business Involving Prostitution  
18 U.S.C. § 1952***

The allegations contained in paragraphs 1 through 9 of the Indictment are hereby realleged and incorporated by reference as if fully set forth herein.

10. On or about March 15, 2015, in Colquitt County, within the Middle District of Georgia, and elsewhere,

**(15) JUAN GOMEZ,**

Defendant herein, aided and abetted by other individuals, known and unknown to the Grand Jury, used a facility in interstate commerce, that is a cellular telephone, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being prostitution, which constitutes a violation of the laws of the state of Georgia, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity.

All done in violation of Title 18, United States Code, Sections 1952(a)(3)(A) and 2.

**COUNT FIVE**

***Use of a Facility in Interstate Commerce to Promote the  
Carrying on of a Business Involving Prostitution***

**18 U.S.C. § 1952**

The allegations contained in paragraphs 1 through 10 of the Indictment are hereby realleged and incorporated by reference as if fully set forth herein.

11. On or about March 23, 2015, in Colquitt County, within the Middle District of Georgia, and elsewhere,

**(14) JOHN MCLEOD,**

Defendant herein, aided and abetted by other individuals, known and unknown to the Grand Jury, used a facility in interstate commerce, that is a cellular telephone, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being prostitution, which constitutes a violation of the laws of the state of Georgia, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity.

All done in violation of Title 18, United States Code, Sections 1952(a)(3)(A) and 2.

**FORFEITURE ALLEGATION**

12. The allegations contained in Counts One through Five of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture to the United States of America pursuant to Title 18 United States Code, Sections 981(a)(1)(C), 1594(b)(2) and 2428, as incorporated by Title 28 United States Code, Section 2461.

13. Upon conviction of Counts One through Four of this Indictment the named Defendants shall forfeit to the United States of America, pursuant to Title 18 United States Code, Sections 981(a)(1)(C), 1594(b)(2) and 2428, as incorporated by Title 28 United States Code, Section 2461, any property, real or personal, which constitutes or is derived from proceeds traceable to such offenses.

14. If any property subject to forfeiture 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 that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21 United States Code, Section 853(p), as incorporated by Title 28 United States Code, Section 2461.

All pursuant to Title 18 United States Code, Sections 981(a)(1)(C), 1594(b)(2) and 2428, as incorporated by Title 28 United States Code, Section 2461.

A TRUE BILL.

s/ Foreperson of the Grand Jury  
FOREPERSON OF THE GRAND JURY

Presented by:

MICHAEL J. MOORE  
UNITED STATES ATTORNEY

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TAMARA A. JARRETT  
ASSISTANT UNITED STATES ATTORNEY

4Filed in open court this \_\_\_\_ day of October, 2015.

All pursuant to Title 18 United States Code, Sections 981(a)(1)(C), 1594(b)(2) and 2428, as incorporated by Title 28 United States Code, Section 2461.

A TRUE BILL.

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FOREPERSON OF THE GRAND JURY

Presented by:

MICHAEL J. MOORE  
UNITED STATES ATTORNEY

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TAMARA A. JARRETT  
ASSISTANT UNITED STATES ATTORNEY

5Filed in open court this \_\_\_\_\_ day of October, 2015.