

AFFIDAVIT

I, ~~Howard P. Rebl~~, being duly sworn, depose and state that:

1. I am a Detective with the Broward Sheriff's Office, Broward County State of Florida (BSO). I am currently assigned to the BSO Strategic Investigations Division, Organized Criminal Activities Section. I have been employed as a Broward Sheriff Deputy since March of 1990 and working as a detective in the Organized Crime Section for the past 11 years. I also currently serve as a sworn Task Force Officer with the Federal Bureau of Investigation (FBI) Minor Vice Task Force. During my career, I have participated in numerous investigations involving Organized Crime, Money Laundering, Drug Trafficking, Major Theft, Racketeer Influenced and Corrupt Organizations (R.I.C.O), Human Trafficking and Prostitution investigations. I have participated in numerous search warrants including the preparation and execution of these warrants during which documents, contraband, US currency and other evidence of criminal activity were seized.

2. This affidavit is made in support of applications for search warrants to search the contents of two cellular telephones described as: (1) a Motorola Cellular telephone, black and gray in color, bearing model number V3S and serial number A000000E48D06B; and (2) a Verizon/Samsung cellular telephone, black and gray in color, bearing model number SCHU350, FCC ID number A3LSCHU350, and serial number A0000014DA10C6. Said items are currently in the custody of the Broward Sheriff's Office, 880 NW 5 Ave, Ft Lauderdale, Florida, in the Southern District of Florida. As explained in more detail below, I submit that there is probable cause to believe that the contents of said cellular telephones are evidence of crimes, that is, violations of Title 18, United States Code, Sections 1591 (Human Trafficking), and 2422(b) (Use of facilities of Interstate Commerce to procure minors to engage in Prostitution).

3. This affidavit is based upon my personal knowledge and information provided to me by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, it does not set forth each and every fact known to me regarding this investigation.

4. On 10/1/09, your affiant received information from a Broward Sheriff Office Detective in reference to a reported missing juvenile. Detective Masters advised that he received information from a source that a 15-year-old female was being advertised as an escort on "BackPage.Com," which is an on-line classified advertising service. ~~The ad displayed the female identified as "Rebecca" in a provocative~~

pose and stated "Daddy's little girl, gone wild, anything goes". The ad listed a phone number to call as 954 297 1727. The female juvenile was positively identified from the photos and tattoos on her body as a juvenile reported missing by the Hillsborough County Sheriff Office, who will be referred to as Minor #1. Minor #1 had previously run away several times and was believed to be involved with prostitution in the Broward County area. A decision was made to contact the number listed on the ad in an undercover capacity and attempt to recover the female. A Broward Sheriff Office undercover (UC) contacted the phone number listed on the ad and requested that the female "~~Rebecca~~" respond for a date.

5. On 10/1/09 at approximately 1700 hours, another recorded call was made to the number listed on the ad 954-297-1727. A message was left for "~~Rebecca~~" to call us back. Several minutes later a female identifying herself as "~~Rebecca~~" did call back. The female was advised that we wanted to have a "threesome." The UC asked the female if she was OK with couples and how much was it going to cost. The female "~~Rebecca~~" agreed upon a price of \$200.00 for one hour. "~~Rebecca~~" advised that she could respond to the location at approximately 8pm. At approximately 8:30pm, a dark-colored Chrysler 300 bearing Florida tag 486KBD arrived in front of the apartment. Exterior surveillance advised that the vehicle was occupied by a black male driver and a white female passenger. The white female passenger exited the vehicle and knocked on the front door of the undercover apartment. The female entered the apartment and was greeted by two UC detectives. Upon making contact with the female your affiant immediately recognized the subject as Minor #1 from a missing persons photo supplied by the reporting agency. In order to confirm that Minor #1 had responded to the location for the purpose of prostitution, the UC asked Minor #1 if she was OK with having a threesome, and she replied, "yes." The take-down team entered the room and detained Minor #1.

6. The vehicle (dark-colored Chrysler 300) that had delivered Minor #1 to the location had pulled away from the area. I requested that surveillance units stop the vehicle to identify the driver.

7. Investigators asked Minor #1 to identify herself and she attempted to provide investigators with a false name. Eventually Minor #1 admitted that she provided a false name and advised that she had not been the person who answered the phone calls made by the undercover officer. Minor #1 was advised of the nature of the investigation and read her *Miranda* warnings. Minor #1 initially refused to cooperate and did not want to answer any questions. Minor #1 was arrested and charge with providing false name to law enforcement and prostitution. Despite initially refusing to cooperate, Minor #1 continued to volunteer information and "brag" about her prostitution activities, including the following.

8. During an inventory of the purse belonging to Minor #1 upon her arrest, I located a Florida Drivers License issued to "Maritza Isbelia Rodriguez," and a Bank of America check card issued in the same name. Minor #1 stated that the drivers license belonged to her friend, "Maritza." Minor #1 stated that it was actually Maritza that had answered the telephone calls from the undercover. Minor #1 advised that Maritza made a three way call to her and that is why we heard the voice of Minor #1 on the phone during one of the calls. Minor #1 stated that Maritza handles all the incoming calls from the clients. I asked Minor #1 about the person who had transported her to the apartment. Minor #1 stated that the subject was a friend that she had just met. Minor #1 identified the friend as "Jay". I asked Minor #1 where her cellular phone was. Minor #1 replied she was not "stupid", she does not use her phone. Minor #1 explained that she used "Jay's" phone. In the purse of Minor #1, I located handwritten notes with names, locations and amounts of money. Minor #1 advised that those were "tricks" (clients) that she had prior to arriving at our location. I also located numerous hotel key cards for The Geneva and LaQuinta Hotel, Trojan Condoms and an Opticians receipt issued to M Rodriguez. Minor #1 continued to make statements such as that she makes approximately \$1000.00 a night. Minor #1 bragged that she does not "Fuck for Free, I get paid for sex". Minor #1 advised that her nickname on the street is "Star". Minor #1 advised that she ran away from home because "they [presumably, her family] were liars." Minor #1 advised that she ran away with another girl she identified as "Kiki". Minor #1 stated that [REDACTED] had been working with her until they had a fight. Minor #1 advised that [REDACTED] the hotel and she does not know her current location. Minor #1 admitted that she was aware of approximately seven underage girls that are working as prostitutes. Minor #1 refused to give us any information on the location of the underage girls. Minor #1 was transported the Broward County Juvenile Intake facility.

9. The vehicle that delivered Minor #1 was identified as a black Chrysler 300 Florida Tag 486 KBD. The vehicle was stopped in the 4200 block of North State Road 441. The driver of the vehicle was identified as a black male named Johnny Saintil. Saintil advised deputies that he had just dropped off a female he identified as "~~Jamie Potts~~", a nineteen-year-old. A teletype check determined that Saintil currently had a suspended driver license. Johnny Saintil was arrested and charged with Driving on a Suspended Florida Drivers License.

10. An inventory search incident to arrest was conducted on Saintil and the vehicle that he was operating. Saintil was found to be in possession of a Motorola Cellular telephone, black and gray in

color bearing model number V3S and serial number A000000E48D06B. Inside the vehicle, detectives located in plain view (1) sheet of paper with (6) handwritten phone numbers. One of the numbers listed on the sheet, 786-955-5270, was being used to advertise the escort services of a young female on BackPage.com. The ad states "Ms Passion, The perfect naughty girl for U". Also located in plain view were Western Union receipts for payments made to Metro PCS. Western Union receipt # 8455008424-5 indicated a payment was made to Metro PCS in the amount of \$63.85 for phone number 954 297 1727. The sender's name was listed as Maritza Rodriguez. The phone number matches the number listed on the escort ad displayed on BackPage.com for "[REDACTED]" (SM). Western Union receipt # 8455008423-6 indicated a payment was made to Metro PCS in the amount of \$73.44 for phone number 786 597 2709. The sender's name was listed as "Russell Simmons."

11. From my training and experience and the training and experience of other officers, I know that the electronic data contained on certain types of cellular phones can be remotely deleted by sending a "poison pill." In other words, someone can use a computer program to delete the information on the cellular phone even if the phone is in someone else's custody. On 10/2/09 at 11:36 am your affiant met with Broward Sheriff Office Computer Forensics Technician Jean Burnett who confirmed that the data on the Motorola cellular phone seized from Saintil could be remotely deleted. To secure that data from any external corruption, Technician Burnett downloaded the data contained on the Motorola cellular phone onto a Cellebrite Thumb Drive without inspecting any of the data. Technician Burnett then sealed the Thumb Drive in an envelope in my presence and it was placed in a secure location where it has remained, unopened, pending the issuance of a search warrant.

12. On 10/5/09, your affiant requested and received a copy of Broward County Jail calls made by Johnny Saintil from 10/1/09 to 10/5/09. I received a total of 16 calls. The following is a description of the conversation on selected calls.

Call #1 to 754 281 2715, date 10/2/09 1:42 am . Saintil talking to a subject he identified as "Raz". Saintil advised that he was arrested by the "Raiders" after he dropped the girl off at her "Call". Saintil advised that they took his phone.

Call # 4 to 954 297 1727, date 10/2/09 1:50am. Saintil identified himself as "J1". Saintil (J1) ask a female identified as "Ritz" if she knew where "Star" was. Saintil stated "that they must of grabbed her after they saw me drop her off". Saintil asked "Ritz" if everything was ok. "Ritz" replied "yes we are getting calls".

Call# 7 to 954 297 1727, date 10/2/09 2:10 am. Saintil is speaking to an unknown male. Saintil tells the subject that something is "Fishy, they might have grabbed her and they watched the whole set". The unknown male subject asked Saintil if he thinks they know that we are "Married up". Saintil replied "no, not that deep". Saintil is concerned as to why the police took his phone.

Call# 10 to 954 696 9393, date 10/2/09 6:50 pm. Saintil is speaking to an unknown male subject and the female he identified as "Ritz". The unknown male tells Saintil that "Star" is locked up. Saintil tells "Ritz" to delete all the contact information from his phone off the Metro PCS website. Saintil tells "Ritz" to transfer all the information to another phone. Saintil tells the subject the phone is listed under the name of "Russell Simmons".

13. On October 9, 2009, an undercover operation was conducted in an attempt to locate a missing 17-year-old female who was posting ads on Backpage.com as "~~KIKI~~" for the purposes of prostitution. Information received from Minor #1 indicated that "~~KIKI~~" was also a juvenile runaway. Your affiant posed undercover as a customer and was directed to room #426 at the LaQuinta Hotel located at 5070 N State Road 7, Ft Lauderdale, FL. Upon arriving at room #426, I was greeted by a black female holding a condom in her hand. During questioning the black female was identified as a 14-year-old missing juvenile, hereinafter referred to as Minor #2.

14. Minor #2 was debriefed by your affiant and other law enforcement officers, at which time she stated that she was working as a prostitute for a subject known to her as "Raz". Minor #2 described the subject as a black male in his twenties, tall, skinny with long dreadlock hair. Minor #2 advised that "Raz" recruited her from the shelter that she had been staying at in Ft Lauderdale. Minor #2 stated that after engaging in sexual acts with the customer (undercover detective) she was supposed to return to "Raz" with the money. Minor #2 stated that she was not allowed to keep any of the money and was rarely allowed to leave the hotel room where "~~Raz~~" was staying unless she was sent to a specific room to engage in sexual acts. Minor #2 also stated that "~~Raz~~" took nude photographs of her with his cellular telephone and then uploaded those photographs to a laptop computer to post online ads under the name of "Tokyo". Minor #2 was shown the ads that were taken from Backpage.com and she confirmed that the nude photographs were of her and the same ones that "Raz" had taken with his cellular telephone. Minor #2 advised that "~~Raz~~" was working with other pimps that she identified as "J1", "Fat Boy," and "Bird".

15. At the time of our contact with Minor #2, she was in possession of a cellular phone identified as a Verizon/Samsung cellular telephone, black and gray in color, bearing model number SCHU350, FCC ID number A3LSCHU350 and serial number A0000014DA10C6. Minor #2 advised that the phone was given to her by one of the other girls working for "~~Raz~~". Minor #2 advised that the phone was used to communicate with customers and the other girls. Minor #2 indicated the number for the phone as 954-226-0708. The Verizon/Samsung phone was taken as evidence and is currently in the possession of the Broward Sheriff Office. Upon consultation with Computer Forensics Technician Jean Burnett, it

was determined that this type of phone was not amenable to remote deletion of data. Minor #2 provided written consent to the seizure of the telephone and examine its contents.

16. Several BackPage.com internet ads have been located using the phone number 954-226-0708. The ads display suspected underage girls advertising themselves for escort services. As previously listed in this affidavit, Johnny Saintil a.k.a "J1" was overheard speaking to a subject he identified as "Raz" in Broward County jail call#1.

17. Your affiant knows that cellular telephones are frequently used by subjects involved in the facilitation of prostitution and human trafficking to maintain contact between the prostitute, the pimp, and the customers. Therefore, the seized cellular telephones are property which have been used in committing criminal offenses.

18. Based upon my training and experience and the training and experience of other law enforcement officers, I know that cellular telephones maintain a directory of telephone calls and history of calls made. This stored information contains evidence of a crime, and could identify co-conspirators.

19. I further know that cellular phones can contain additional information, such as stored contact lists, photographs, text messages, and calendars. Based on the foregoing information, you affiant respectfully submits that there is probable cause to believe that the cellular phones described as: (1) a Motorola Cellular telephone, black and gray in color, bearing model number V3S and serial number A000000E48D06B; and (2) a Verizon/Samsung cellular telephone, black and gray in color, bearing model number SCHU350, FCC ID number A3LSCHU350, and serial number A0000014DA10C6, which are currently in the custody of the Broward Sheriff's Office, will contain evidence of the crimes of human trafficking, in violation of Title 18, United States Code, Section 1591, and the use of facilities of interstate commerce to procure and induce minors to engage in prostitution, in violation of Title 18, United States Code, Section 2422(b).

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Howard P. Rehl, Task Force Officer



Sworn and subscribed to before me
this ____ day of November, 2009.

BARRY S. SELTZER
UNITED STATES MAGISTRATE JUDGE