

FILED
DEC 17 2019
CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY _____ DEPUTY

*unsealed
on 12/17/19*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**FREDRICK JIMENEZ (1),
EFRAIN JIMENEZ (2),**

Defendants.

Magistrate Case No. 19MJ5615

**COMPLAINT FOR VIOLATION OF
Title 18, U.S.C., Sec. 1591(d)
Obstruction of Sex Trafficking
Enforcement**

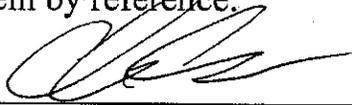
(UNDER SEAL)

The undersigned complainant being duly sworn states:

COUNT ONE

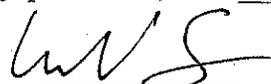
On or about October 13, 2019, within the Southern District of California, defendants, FREDRICK JIMENEZ and EFRAIN JIMENEZ obstructed, attempted to obstruct, interfered with and prevented the enforcement of Title 18, United States Code, Section 1591, in the case of *United States v. Pratt et al.*, 19MJ4453; in violation of Title 18, United States Code, Section 1591(d).

The complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.



Chase Chiappino
Special Deputy U.S. Marshal

Sworn to before me and subscribed in my presence, this 5 day of December, 2019.



Honorable William V. Gallo
United States Magistrate Judge

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PROBABLE CAUSE STATEMENT

On October 9, 2019, law enforcement officers executed a federal search warrant at the GirlsDoPorn business located at 121 West Broadway, Suites 544, 545 and 546, San Diego, California 92126. In executing the warrant, law enforcement seized large amounts of electronic media, to include servers, hard drives, disks, laptops, DVDs and tapes, totaling 0.6 petabytes of data, as evidence relevant to this investigation.

On the same day as the search warrant was executed, Michael James Pratt and three others were charged by complaint in connection with the GirlsDoPorn business with violating Title 18, U.S.C. Secs. 1594(c) and 1591(a)(1) and (2) – Conspiracy to Commit Sex Trafficking by Force, Fraud and Coercion; Title 18, U.S.C. Sec. 1591(a)(1) and (2) – Sex Trafficking by Force, Fraud and Coercion; and Title 18, U.S.C. Sec. 1594(d) and (e), Title 18 U.S.C. Sec. 2253(a)(2), (a)(3) and (b), and Title 28 U.S.C. Sec. 2461(c) – Criminal Forfeiture in *Unites States v. Pratt et al.*, 19MJ4453. Three of the four defendants --everyone except Pratt-- entered their first appearance and were informed of these charges in open court on October 10, 2019.

When agents executed the search on the GirlsDoPorn business, an individual identified as Mark A. was present. He said he was employed by the business. Agents interviewed him and seized his phone pursuant to the warrant. The agents told Mark A. that they were investigating sex trafficking in connection with the business. They noticed that Mark A. had recently been communicating with Pratt. Agents paid attention to this communication, because they had been unable to locate Pratt to arrest him on the complaint. After interviewing Mark A., agents released him.

In 2016, multiple plaintiffs filed a civil lawsuit in San Diego Superior Court against Pratt and others alleging that they . . . tricked the plaintiffs into

appearing in pornographic videos posted to GirlsDoPorn.com. Trial in the civil case against Pratt and others started in August 2019. Agents believe that Pratt had fled the United States by that time. Furthermore, by early September 2019, Pratt had liquidated his assets, and declared bankruptcy. Pratt is a citizen of New Zealand with Legal Permanent Resident status in the United States, and his whereabouts remain unknown.

On Saturday, October 13, 2019 --four days after the search warrant was executed and three days after the complaint was unsealed and the defendants arraigned in open court-- at approximately 2:40 p.m., two San Diego County Sheriff's Department Deputies responded to a call from a neighbor concerned that individuals unknown to the caller were emptying the contents of a residence located at 10375 Cerveza Baja Drive, Escondido, California (the residence) into a U-Haul trailer. Before his disappearance, Pratt had been living at this residence. Law enforcement has a record of Pratt paying the water bill at the residence in January 2019. Further, as detailed below, Pratt had hired pet service providers to take care of his cat at the residence from July 2019 through November 2019.

When the Deputies arrived, they spoke with FREDRICK JIMENEZ (1) and EFRAIN JIMENEZ (2), who are brothers (jointly referred to as the DEFENDANTS). The DEFENDANTS told the Deputies that they were removing their "personal property," although they also conceded that neither one of them lived --or had ever lived-- at the residence. They also stated that they did not know who lived at the residence. When asked why their property was at this residence, FREDRICK JIMENEZ told the Deputies that a friend named "Mark" had borrowed their property. Both DEFENDANTS denied knowing Mark's last name.

After some additional questioning, the DEFENDANTS told the Deputies that Mark gave them the key to the residence and asked them to remove their personal property from the residence. The key that the DEFENDANTS showed the Deputies

opened the front door of the residence, and there were no signs of forced entry. The DEFENDANTS told the Deputies that the property that they had removed and placed in the U-Haul trailer was mostly furniture, televisions and a camping tent. They then added that they had marijuana grow equipment in the trailer. They denied removing any computers or other electronics from the residence. When pressed for details on the property in the U-Haul, the DEFENDANTS declined to answer additional questions.

The Deputies looked in the back of the U-Haul and noted multiple boxes and small portable air conditioners. Portable air conditioners are often used to keep electronic equipment cool to ensure that these expensive pieces of equipment do not overheat and malfunction. The Deputies did not open any of the boxes in the U-Haul or enter the residence.

After speaking with the DEFENDANTS and taking pictures of the inside of the U-Haul, the Deputies left the DEFENDANTS at the residence.

On November 21, 2019, law enforcement officers spoke to two individuals who worked for a San Diego-based pet care service. Pratt had hired them to take care of his cat. Specifically, Pratt had hired this pet care service in July, 2019 to go to his residence at 10375 Cerveza Baja Drive in Escondido, California, to care for his cat on a daily basis. The cat caretakers informed law enforcement that when they first started taking care of Pratt's cat, the residence had multiple computers and computer equipment throughout the residence. All of the computers appeared to be running. However, soon after October 13, 2019, the cat caretakers noticed that all of the computers and computer equipment had been removed. Only some wires remained.

Law enforcement has since learned that employment records for the GirlsDoPorn business reflect that FREDRICK JIMENEZ (1) was an employee of GirlsDoPorn from July 3, 2018, to February 20, 2019.

REQUEST FOR SEALING

It is further respectfully requested that this Court issue an Order sealing, until further order of this Court, this complaint and probable cause statement. Sealing is necessary, because premature disclosure of the contents of this probable cause statement and related documents may cause the defendants and/or additional witnesses to this offense to flee, may cause additional destruction of evidence, and may have a negative impact on this continuing investigation.