

## UNITED STATES DISTRICT COURT

for the  
District of South CarolinaUnited States of America  
v.  
Maria ZAVALA-PEREZ  
120 Plainfield Avenue, Goose Creek, SC 29445

Case No. 2:19-mj-00138

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 19, 2019 in the county of Berkeley in the  
Judicial District of South Carolina, the defendant(s) violated:*Code Section*  
18 U.S.C. 2421  
8 U.S.C. 1324(a)(1)(A)(iii)*Offense Description*  
Transportation of females across state lines for the purpose of prostitution.  
Harboring illegal aliens.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date:

Sept 23, 2019City and state: Charleston, South Carolina

Complainant's signature

Jeffrey Cooper, ICE-HSI Special Agent

Printed name and title

  
Judge's signature

Honorable Bristow Marchant, U.S. Magistrate

Printed name and title

UNITED STATES OF AMERICA )  
 )  
STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF HORRY )

**AFFIDAVIT**

I, Jeffrey Cooper being duly sworn upon oath, depose and state as follows:

1. I am a Special Agent employed by the United States Immigration and Customs Enforcement (“ICE”) under the Department of Homeland Security (“DHS”). I am presently assigned to the Homeland Security Investigations (“HSI”) Office in Charleston, SC (RAC/CT). I have been employed by ICE/HSI, and its predecessor, the Immigration and Naturalization Service (“INS”) as a Special Agent since February 1, 1996. My duties and responsibilities as an ICE/HSI Special Agent involve conducting investigations related to the enforcement of immigration, customs, and other violations against the United States, which also includes the enforcement of both criminal and administrative violations under the Immigration and Nationality Act (INA). Over the course of my career, I have conducted numerous investigations involving human smuggling and trafficking, prostitution offenses, the distribution of narcotics, the manufacture and sale of counterfeit documents, criminal aliens to include street gang members and firearms violations.

2. As an ICE/HSI Special Agent, I received extensive basic and advanced training at the Federal Law Enforcement Training Center in Glynco, Georgia. This training covered aspects of materials contrary to the laws of the United States along with continued basic and add on training related to Immigration Law and related immigration offenses. I have obtained significant experience in the investigations of these and a multitude of other matters during my tenure as a federal law enforcement officer and have functioned in a variety of capacities to include but not

*[Handwritten signature]*

limited to: a case agent coordinating undercover activities and supervising confidential informants; a surveillance agent observing and recording the movements of street gang members as well as individuals involved in or suspected of trafficking in drugs or other illicit contraband to include firearms; and interviewing witnesses, cooperating defendants, and informants regarding these illegal activities. I have further conducted or participated in the execution of numerous search and arrest warrants in connection with the above-mentioned investigations.

3. The factual information set forth in this Affidavit was obtained during the course of this investigation by myself or has been provided to me directly or indirectly by Special Agents and Task Force Officers (TFO's) of HSI, as well as Confidential Sources.

4. The Subject known to HSI as Maria ZAVALETA-PEREZ, aka "La China," is a native and citizen of Mexico with no legal status in the United States and who lives at 120 Plainfield Avenue, Goose Creek, South Carolina 29445 (the "Residence").

5. In July of 2019, your affiant received information from an HSI Source of Information (SOI-1) regarding ZAVALETA-PEREZ who is involved in a prostitution business. SOI-1 has proven in the past to be a reliable Source of Information and has assisted this office by providing actionable information that has led to the arrest of numerous individuals, as well as acted in an undercover capacity to assist this office. In addition to confirming ZAVALETA-PEREZ is commonly referred to as "La China," SOI-1 indicated she uses the telephone number (843) 331-2242. According to SOI-1, ZAVALETA-PEREZ delivers prostitutes to the location of the caller, and in some instances, customers can go to the Residence for business. The cost was previously \$40.00 per female, but the price recently increased to \$50.00. ZAVALETA-PEREZ has two prostitutes every week that stay at the Residence. The two prostitutes are transported down from



North Carolina by ZAVALETA-PEREZ and/or unnamed co-conspirators. The prostitutes typically stay at the Residence for approximately one week before they are transported back to an unknown location in North Carolina. Then, two new prostitutes are driven down to the Residence to take their place.

6. On August 10, 2019, at approximately 9:00 pm, a second Source of Information (SOI-2) conducted a consensually monitored and recorded telephone call to ZAVALETA PEREZ at (843) 331-2242 for which I was present. SOI-2 has proven in the past to be a reliable Source of Information and assisted this office by providing actionable information that has led to the arrest of numerous individuals and has also assisted this office by acting in an undercover capacity. At the conclusion of the call, SOI-2 was debriefed and provided the following information: a female answered and SOI-2 asked for "La China." The female acknowledged that she was "La China." SOI-2 stated that he wanted a girl and asked how much it would cost. ZAVALETA-PEREZ stated that it was \$50.00. SOI-2 asked if she would give a discount if there were four guys. ZAVALETA-PEREZ said "no, what do you think this is, a flea market." SOI-2 stated that the call then dropped. SOI-2 immediately called ZAVALETA-PEREZ back at (843) 331-2242. ZAVALETA-PEREZ answered, and SOI-2 asked ZAVALETA-PEREZ if she needed an address where to bring the girl. ZAVALETA-PEREZ stated that she was very busy with business and could maybe bring a girl later that night. SOI-2 told ZAVALETA-PEREZ that he would call back later that night. Based on the information provided during the call and through my training and experience investigating these types of cases, your affiant can infer that ZAVALETA PEREZ, aka "La China," meant that the prostitute would cost \$50.00 but that they were tied up with other customers and were not currently available. August 10, 2019 was a Saturday night,



which is traditionally an extremely busy night for prostitution related activities within the Hispanic community.

7. On August 27, 2019, your affiant conducted surveillance of the Residence. At approximately 4:20 am, a silver GMC Terrain bearing SC registration RNY-372 that is registered to ZAVALETA-PEREZ is observed leaving 120 Plainfield Avenue. It was unknown how many occupants were present in the vehicle. At approximately 7:50 am, the Terrain was observed parked at the Ashley Place Apartments at 6614 Idlewild Road, Charlotte, North Carolina. HSI Charlotte S/A Burns conducted surveillance of the Terrain and at approximately 12:10 pm, observed three (3) Hispanic females exit the Botanica El Santuario De Mi Santa store located at 1125 E. Sugar Creek Rd, Suite F, Charlotte, NC 28205 and leave in the Terrain. At approximately 12:30 pm, additional surveillance revealed that the Terrain with the three Hispanic females was heading south back towards South Carolina on Highway 77.

8. On August 27, 2019, at approximately 3:30 pm, Deputy Cox with the Charleston County Sheriff's Office (CCSO) conducted a traffic stop of the Terrain for an improper lane change. HSI Task Force Officer (TFO) Khan assisted with the stop. The stop occurred at the Circle K gas station located at 9195 University Blvd., North Charleston, SC 29406. The driver of the vehicle was ZAVALETA-PEREZ and she provided an International Driver's License in the name Maria A. ZAVALETA-PEREZ, with an address of 120 Plainfield Avenue, Goose Creek, SC 29445. ZAVALETA-PEREZ also provided a Mexican Passport in the same name. ZAVALETA-PEREZ told Deputy Cox that she was returning from Charlotte, NC after seeing a Doctor. ZAVALETA-PEREZ stated that the two female passengers were coming to South Carolina for a visit. The front seat passenger provided a Mexican passport and was identified as Guadalupe

GOMEZ-Lorenzo, with a date of birth of 12/17/1986 and an address of 6614 Idlewild Road, Charlotte, North Carolina and phone number of (843) 469-0927. The rear passenger provided a Mexican passport and was identified as Lucila MUNOZ-Pelcastre, with a date of birth of 11/30/1969 and an address of 2937 N. Dekalb, Atlanta, GA and phone number of (404) 820-4219. HSI/TFO Khan stated that when both passengers were asked questions, they would look at ZAVALTA-PEREZ for directions on how to answer. Deputy Cox issued ZAVALTA-PEREZ a Warning Citation for the improper lane change and expired registration and allowed them to leave in the Terrain. Your affiant conducted surveillance of the Terrain and observed it return to the Residence.

9. On August 28, 2019, HSI Charleston agents conducted surveillance of the GMC Terrain. At approximately 1:40 pm, the Terrain was observed parked at the SCDMV office located at 135 Wimberly Drive, Ladson, SC 29456. Surveillance units observed ZAVALTA-PEREZ get into the driver's side of the Terrain and a Hispanic Female (HF) who appeared to be Lucila MUNOZ-Pelcastre (rear passenger during August 27<sup>th</sup> traffic stop), get into the front passenger seat. HSI S/A Hawsey, S/A Haviland, HSI/TFO Khan, S/A Caines, S/A Garrido and your affiant continued surveillance of the Terrain and the occupants and at approximately 2:05 pm, observed it stop in a mobile home park on Andrews Blvd. in Goose Creek, SC. The vehicle stopped near Trailer #26 and the passenger (believed to be MUNOZ-Pelcastre) went inside the trailer while ZAVALTA-PEREZ remained in the Terrain. At approximately 2:15 pm, the passenger returned to the Terrain and they left the mobile home park. The Terrain then proceeded to the Dale Valley mobile home park at 7021 Stall Road, North Charleston, SC and arrived at approximately 2:34 pm. The passenger was observed going inside Trailer #5 while ZAVALTA-PEREZ remained

in the vehicle. At approximately 2:43 pm, the female passenger returned to the Terrain and they left. At approximately 2:50 pm, surveillance units observed the Terrain arrive at the Hawthorne mobile home park at 1990 Hawthorne Drive, North Charleston, SC 29406 and park at or near Trailer #166 (light brown trailer) on Hawthorne Drive. The passenger went inside the trailer while ZAVALETA-PEREZ remained in the vehicle. At approximately 3:14 pm, the female passenger exited the trailer and returned to the Terrain. The Terrain departed Hawthorne mobile home park and at approximately 3:35 pm arrived at the Money Man Pawn shop located at 116 S. Goose Creek Blvd., Goose Creek, SC 29445. Both ZAVALETA-PEREZ and the passenger entered the pawn shop. At approximately 3:51 pm, ZAVALETA-PEREZ and the female passenger returned to the Terrain, departed the area and were observed returning to 120 Plainfield Avenue, Goose Creek, SC.

10. On August 29, 2019, your affiant conducted record checks of Guadalupe GOMEZ-Lorenzo and Lucila MUNOZ-Pelcastre in ICE/HSI and NCIC computer databases. There were no records found for GOMEZ-Lorenzo nor MUNOZ-Pelcastre having legal status in the United States and your affiant determined that they were both unlawfully present in the United States. The NCIC database also revealed that MUNOZ-Pelcastre had been assigned FBI# 288412NC6 pursuant to her conviction on 05/16/2007 in Gwinnett County, GA for the charge of Prostitution.

11. On September 19, 2019, at approximately 3:05 pm, SOI-1 conducted a consensually monitored and recorded telephone call to ZAVALETA PEREZ at (843) 331-2242. Your affiant and HSI Special Agent Vic Gomez were present to monitor the call. At the conclusion of the call, SOI-1 was debriefed and provided the following information:

- a. ZAVALETA-PEREZ answered the call and SOI-1 stated that he had some friends

that were looking for girls. ZAVALETA-PEREZ responded that she can bring them at 6:00 pm that night. SOI-1 asked if ZAVALETA-PEREZ wanted the address and ZAVALETA-PEREZ responded that she was currently driving and asked SOI-1 to text her the address.

- b. At approximately 3:13 pm, SOI-1 sent a text message to ZAVALETA-PEREZ at the number (843) 331-2242 with the address of the Driftwood Apartment Complex at 7360 Stall Road, apt F-4 and told ZAVALETA-PEREZ to let him know if she could bring the girls earlier.
- c. At approximately 3:15 pm, ZAVALETA-PEREZ responded "ok," to SOI-1 via text message.

12. On September 19, 2019, at approximately 5:30 pm, HSI agents conducting surveillance of the Residence observed two Hispanic females (HF's) exit the residence and leave in the Black Acura MDX bearing NC registration FLN-7308. Surveillance was conducted of the Acura MDX and the vehicle proceeded to Interstate 26 westbound. At approximately 5:50 pm, the Acura was stopped by S/A Fey with the South Carolina Law Enforcement Division (SLED) for a speeding violation at or near mile marker 197. The driver of the Acura was identified as Guadalupe GOMEZ-Lorenzo and provided a Mexican passport in the same name. SA Gomez assisted with the traffic stop and determined that GOMEZ-Lorenzo was a citizen of Mexico who was unlawfully present in the United States. GOMEZ-Lorenzo stated that they were returning to the Charlotte, North Carolina area. The passenger in the Acura was identified as Silvia RODRIGUEZ-Ballester and told SA Gomez that she was a citizen of Mexico unlawfully present in the United States. Both GOMEZ-Lorenzo and RODRIGUEZ-Ballester were administratively



arrested and transported to the HSI Charleston office.

13. On September 19, 2019, at approximately 5:30 pm, HSI agents conducting surveillance of 120 Plainfield Avenue, Goose Creek observed ZAVALETA-PEREZ and a female depart the residence and leave in a maroon Honda Civic that had been parked at the residence; ZAVALETA-PEREZ was driving the Civic.

14. On September 19, 2019 at approximately 5:30 pm, SOI-1 sent a text message to ZAVALETA-PEREZ asking how long before she would arrive at the apartment. At approximately 5:35 pm, ZAVALETA-PEREZ asked SOI-1 the location of the apartment. SOI-1 responded that it was located in the back and was F4. ZAVALETA-PEREZ then sent SOI-1 a text asking how many people. SOI-1 responded via text and stated "three." ZAVALETA-PEREZ sent a text message responding "ok," and would be there in 20 minutes. At approximately 6:30 pm, a maroon Honda Civic with a Georgetown Auto Sales dealer tag arrived at the Driftwood Apartment Complex. HSI Agents and TFO's observed ZAVALETA-PEREZ driving the Civic with an HF in the passenger seat. The Civic stopped near apartment F4 and remained for a few minutes; the Civic then proceeded to drive around towards the front of the complex and was stopped by HSI Agents and TFO's. The driver of the Civic was identified as Maria ZAVALETA-PEREZ and provided a Mexican passport in the same name. ZAVALETA-PEREZ stated that she was a citizen of Mexico unlawfully present in the United States. The passenger in the vehicle was identified as Ruth ENRIQUEZ-Perez and she stated that she was a citizen of Mexico unlawfully present in the United States. ENRIQUEZ-Perez had a black purse in her possession that contained approximately 15 condoms and a bottle of personal lubricant gel. Both ZAVALETA-PEREZ and ENRIQUEZ-Perez were administratively arrested and

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transported to the HSI Charleston office.

15. On September 19, 2019, HSI Agents and TFO's executed a Federal Search Warrant, at the Residence. During the search of the residence agents found and seized items related to a prostitution business, to include approximately 100 packaged condoms and several bottles of personal lubricant gel.

16. On September 19, 2019, HSI S/A Gomez and S/A Cooper interviewed Ruth ENRIQUEZ-Perez at the HSI Charleston office. ENRIQUEZ-Perez was read her Miranda Warning and agreed to answer questions without an attorney being present. ENRIQUEZ-Perez stated that she had been smuggled into the United States from Mexico through Laredo, Texas in February of 2018, and had intended on traveling to Atlanta, Georgia. ENRIQUEZ-Perez rents space in the basement of a house in Atlanta and provided an address of 4821 Warners Drive, Atlanta, GA. ENRIQUEZ-Perez claimed she did not engage in prostitution activities in Mexico but began approximately two months after she arrived in the United States. ENRIQUEZ-Perez was introduced to an unidentified male (UM) in Atlanta who was involved with driving girls around for prostitution related activities. ENRIQUEZ-Perez stated that this UM is the person who transported her to South Carolina and that this was her first time in Charleston and at the house of ZAVALETA-PEREZ. ENRIQUEZ-Perez stated that ZAVALETA-PEREZ would give her rides around the area to meet with customers. ENRIQUEZ-Perez stated that she has not engaged in any sexual activities under obligation or force.

17. On September 19, 2019, SA Gomez and I interviewed Guadalupe GOMEZ-Lorenzo at the HSI Charleston office. GOMEZ-Lorenzo was read her Miranda Warning and agreed to answer questions without an attorney being present. GOMEZ-Lorenzo stated that she is a citizen



of Mexico and when she was nineteen (19) years of age she met Claudio SANCHEZ in Acapulco, Mexico, who got her involved in prostitution. In 2010, GOMEZ-Lorenzo and SANCHEZ illegally entered the United States from Mexico through an unknown location in Texas. GOMEZ-Lorenzo continued working as a prostitute after she entered the United States. In 2016, GOMEZ-Lorenzo met ZAVALETA-PEREZ in Fayetteville, North Carolina and ZAVALETA-PEREZ was also involved in prostitution. ZAVALETA-PEREZ would sometimes drive GOMEZ-Lorenzo to meet with clients, but on some occasions GOMEZ-Lorenzo would drive herself. ZAVALETA-PEREZ will also allow GOMEZ-Lorenzo to stay at her house in South Carolina. During the last 2 years, GOMEZ-Lorenzo has mainly worked in Charlotte and Charleston. Initially GOMEZ-Lorenzo would split her profits from clients with ZAVALETA-PEREZ, but recently has paid ZAVALETA-PEREZ a monthly fee between \$500-\$800 to stay at her house. ZAVALETA-PEREZ knows that GOMEZ-Lorenzo is from Mexico and does not have "papers" for the United States. During her last trip down to Charleston on or about August 27, 2019, GOMEZ-Lorenzo saw approximately ten (10) clients. ZAVALETA-PEREZ did transport GOMEZ-Lorenzo to meet with some of these clients.


18. On September 19, 2019 SA Gomez and I interviewed ZAVALETA-PEREZ at the HSI Charleston office. ZAVALETA-PEREZ was read her Miranda Warning and agreed to answer questions without an attorney being present. ZAVALETA-PEREZ stated she was from Oaxaca, Mexico and could not remember the year that she illegally entered the United States. ZAVALETA-PEREZ stated that approximately one year and ten months ago her son was smuggled into the United States and the smuggling fee was \$9,700. ZAVALETA-PEREZ needed to borrow money to pay the smuggling fee and borrowed the money from an individual

named Miguel SANCHEZ who lives in Charlotte. SANCHEZ works in the prostitution business and explained to ZAVALETA-PEREZ how she could work in this business. ZAVALETA-PEREZ started working with SANCHEZ and he would sometimes send her the girls to work. ZAVALETA-PEREZ stated that Ruth, AKA: "Vanessa," (referring to Ruth ENRIQUE-Perez), arrived at her house in Goose Creek on Sunday morning and SANCHEZ sent her. Since she had arrived in Goose Creek, Ruth had been with approximately forty-five (45) clients. ZAVALETA-PEREZ explained that the profits from the clients are split 50/50 between the girls and her. The prostitutes or "girls" charge \$30, but sometimes there is an additional charge of \$20 for other services which would increase the cost to \$50. The extra \$20 is kept by the girl who engages in the sexual act. The \$30 is for fifteen (15) minutes. The girls come from Atlanta, Charlotte, Virginia, Florida, Maryland and New York. ZAVALETA-PEREZ stated that she only works with older girls here and the youngest has been approximately twenty-six (26) years of age.

19. Based on the foregoing, I have probable cause to believe that Maria ZAVALETA-PEREZ was involved in the transportation of females across state lines for the purpose of prostitution in violation of Title 18, United States Code, Section 2421 and harboring illegal aliens in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

20. This affidavit has been reviewed by Assistant United States Attorney Matt Austin.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Jeffrey Cooper  
Special Agent, ICE-HSI  
Charleston, South Carolina

Signed and Sworn to before me,  
this 23 day of September, 2019.

  
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Bristow Marchant  
United States Magistrate Judge