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BY: _____
 CLERK OF DISTRICT COURT
 U.S. DISTRICT COURT
 CENTRAL DISTRICT OF CALIF.
 12 MAY 29 PM 3:17

9 Attorneys for Plaintiff
 United States of America

11 UNITED STATES DISTRICT COURT
 12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
 13 WESTERN DIVISION

14 UNITED STATES OF AMERICA,)
)
 15 Plaintiff,)
)
 16 v.)
)
 17 ONE 27 INCH IMAC APPLE COMPUTER,)
)
 18 Defendant.)
)

NO. CV **CV 12-04684 JFW (FWK)**
VERIFIED
COMPLAINT FOR FORFEITURE
 [18 U.S.C. § 1594(e)(1)]
 [F.B.I.]

20 The United States of America brings this claim against the
 21 defendant one 27-inch iMac Apple computer ("defendant iMac") and
 22 alleges as follows:

23 JURISDICTION AND VENUE

- 24 1. This is a civil forfeiture action brought pursuant to
 25 18 U.S.C. § 1594(e)(1).
 26 2. This court has jurisdiction over the matter under 28
 27 U.S.C. §§ 1345 and 1355.

1 3. Venue lies in this district pursuant to 28 U.S.C.
2 § 1395(b).

3 PERSONS AND ENTITIES

4 4. The plaintiff is the United States of America.

5 5. The defendant is One 27-Inch iMac Apple Computer seized
6 from the residence of Darrius Marques Sutton ("Sutton") in Los
7 Angeles, California on December 8, 2011.

8 6. The interests of Sutton may be adversely affected by
9 these proceedings.

10 7. The defendant iMac was seized pursuant to a state
11 search warrant by law enforcement officers of the Innocence Lost
12 Task Force ("ILTF"), and is currently in the custody of the
13 Federal Bureau of Investigation, where it shall remain subject to
14 this court's jurisdiction during the pendency of this action.

15 FACTS SUPPORTING FORFEITURE

16 8. On August 28, 2011, at approximately 2:50 p.m., Los
17 Angeles Police Department Van Nuys Area Patrol Officers received
18 a radio call regarding a kidnaping at Ventura Boulevard and
19 Coldwater Canyon. The officers were informed by the mother of
20 victim Samantha A. that Samantha A. had sent a text message that
21 she was being held against her will by pimps. The two pimps were
22 identified as Sutton and Chad Miller ("Miller"). Sutton and
23 Miller were known to be driving a gold Lexus with license plate
24 number 4MSDOE.

25 9. Officers traveled to the Sportsmen's Lodge located at
26 12825 Ventura Boulevard, Studio City, California 91604, and
27 confirmed with hotel staff that Sutton was a registered guest in
28

1 room 622. The hotel staff further informed officers that victim
2 Samantha A., along with another male and female, were also
3 staying in room 622.

4 10. Officers went to room 622 and gained entry to the room
5 after knocking on the door. Inside, they found five males
6 (including Sutton and Miller) and three females. The three other
7 males in the room were Leprinceton Burks ("Burks"), Brandon
8 Golden-Talifero ("Golden-Talifero") and Deshone Williams
9 ("Williams"). The females in the room were victims Samantha A.,
10 Haylie P. and Ariel T. Haylie P. and Ariel T. were minors.

11 11. After officers interviewed everyone in the room, they
12 determined that victim Samantha A., Haylie P. and Ariel T. were
13 victims of various felony crimes including pimping and various
14 sex-related crimes. Sutton was arrested and booked for a
15 violation of Penal Code Section 286(b)(2) (sodomy of a person
16 under 16 years old). Miller was arrested and booked for a
17 violation of Penal Code Section 266(h) (pimping). Burks was
18 arrested and booked for a violation of Penal Code Section
19 266(h)(b) (pimping of a minor). Williams and Golden-Talifero
20 were arrested and booked on unrelated misdemeanor outstanding
21 warrants.

22 12. Multiple cellular telephones, two computers, a credit
23 card belonging to Miller and currency were located. Sutton,
24 Miller and Burks provided officers with written consent to search
25 their cellular telephones and computers. During the consent
26 searches, officers found multiple text messages on Miller's and
27 Burks' cellular telephones which discussed prostitution.

1 Officers found a video of victim Ariel T. engaged in sexual acts
2 with an unidentified Black female on Burks' computer. The
3 cellular telephones and computers were seized.

4 13. On September 29, 2011, all of the electronic/digital
5 evidence recovered was transferred to the custody of the Federal
6 Bureau of Investigation. A federal search warrant was obtained
7 to search all of the electronic devices. Sutton's cellular
8 telephone was found to contain numerous videos of Sutton and
9 victim Ariel T. speaking about prostitution-related activities.
10 Other videos showed Sutton and another individual engaged in
11 various sex acts with victim Ariel T. Some of the videos were
12 believed to have been recorded at Sutton's residence in Carson,
13 California 90746.¹

14 14. On December 5, 2011, a California state search warrant
15 was obtained for Sutton's residence. The defendant iMac was
16 seized during the search of the residence.

17 Criminal History

18 15. A criminal history check revealed that in August 2011,
19 Sutton was arrested for violations of Penal Code Sections
20 286(b)(2) (sodomy with a person under 16 years), 236.1(a) (human
21 trafficking), 266H(a) (pimping), 266I(a)(1) (procure another
22 person for the purpose of prostitution) and 207(a) (kidnapping),
23 resulting in felony convictions, in The People of the State of
24 California v. Darrius Marques Sutton, Case No. BA388308-01. In
25 December 2011, Sutton was arrested for violations of Penal Code

26 _____
27 ¹ Pursuant to Local Rule 79-5.4(e), the home address has
28 been omitted.

1 Sections 182(a)(1) (criminal conspiracy), 261(a)(3) (rape) and
2 288A(b)(2) (oral copulation), resulting in felony convictions, in
3 The People of the State of California v. Darrius Marques Sutton,
4 Case No. BA391566-01.

5 16. Based upon the facts set out herein, plaintiff alleges
6 that the defendant iMac was used to facilitate one or more
7 violations of 18 U.S.C. § 1591 (sex trafficking of children or by
8 force, fraud or coercion). The defendant iMac is therefore
9 subject to forfeiture pursuant to 18 U.S.C. § 1594(e)(1).

10 WHEREFORE, plaintiff United States of America prays that:

11 (a) due process issue to enforce the forfeiture of the
12 defendant iMac;

13 (b) due notice be given to all interested parties to appear
14 and show cause why forfeiture should not be decreed;

15 (c) that this Court decree forfeiture of the defendant iMac
16 to the United States of America for disposition according to law;

17 and,

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1 (d) for such other and further relief as this Court may
2 deem just and proper, together with the costs and disbursements
3 of this action.

4 DATED: May 29, 2012

ANDRÉ BIROTTE JR.
United States Attorney
ROBERT E. DUGDALE
Assistant United States Attorney
Chief, Criminal Division

7 

8 STEVEN R. WELK
Assistant United States Attorney
9 Chief, Asset Forfeiture Section

10 Attorneys for Plaintiff
United States of America

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1 VERIFICATION

2 I, Robin Letourneau, hereby declare that:

3 1. I am a Task Force Officer assigned with the Federal
4 Bureau of Investigation.

5 2. I have read the attached Complaint for Forfeiture and
6 know the contents thereof.

7 3. The information contained in the Complaint is either
8 known to me personally, was furnished to me by official
9 government sources, or obtained pursuant to subpoena. I am
10 informed and believe that the allegations set out in the
11 Complaint are true.

12 I declare under penalty of perjury that the foregoing is
13 true and correct.

14 Executed May 29, 2012 in Los Angeles, California.

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17 ROBIN LETOURNEAU
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge John F. Walter and the assigned discovery Magistrate Judge is Frederick F. Mumm.

The case number on all documents filed with the Court should read as follows:

CV12- 4684 JFW (FFMx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

Eastern Division
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

COPY

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) United States of America	DEFENDANTS One 27 Inch iMac Apple Computer
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Steven R. Welk, Assistant United States Attorney 1400 United States Courthouse, 312 North Spring Street Los Angeles, California 90012; Telephone: (213)894-6166 Fax: (213) 894-7177	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input checked="" type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="border: none;"></td> <td style="border: none; text-align: center;">PTF</td> <td style="border: none; text-align: center;">DEF</td> <td style="border: none;"></td> <td style="border: none; text-align: center;">PTF</td> <td style="border: none; text-align: center;">DEF</td> </tr> <tr> <td style="border: none;">Citizen of This State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 1</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 1</td> <td style="border: none;">Incorporated or Principal Place of Business in this State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 4</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td style="border: none;">Citizen of Another State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 2</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 2</td> <td style="border: none;">Incorporated and Principal Place of Business in Another State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 5</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td style="border: none;">Citizen or Subject of a Foreign Country</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 3</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 3</td> <td style="border: none;">Foreign Nation</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 6</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)

<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from another district (specify):	<input type="checkbox"/> 6 Multi-District Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge
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V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: Yes No MONEY DEMANDED IN COMPLAINT: \$ _____

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 18 U.S.C. § 1594(e)(1)

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input checked="" type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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CV12-04684

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) A. Arise from the same or closely related transactions, happenings, or events; or
 B. Call for determination of the same or substantially related or similar questions of law and fact; or
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):  Date May 29, 2012

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))