

CASE UNSEALED PER ORDER OF COURT  
**SEALED**

**FILED**  
OCT 10 2019  
CLERK US DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY DEPUTY

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL JAMES PRATT (1)  
MATTHEW ISAAC WOLFE (2),  
RUBEN ANDRE GARCIA (3),  
VALORIE MOSER (4),

Defendants.

Case No.: **19MJ4453**

**COMPLAINT FOR VIOLATION OF:**

Title 18, U.S.C., Section 1591(a) and (b)(1) – Sex Trafficking by Force, Fraud, or Coercion; Title 18, U.S.C., Section 1594(c) – Conspiracy to Commit Sex Trafficking by Force, Fraud, or Coercion; and Title 18, U.S.C., Section 1594(d) – Criminal Forfeiture

The undersigned Complainant, being duly sworn, states:

**Count 1**

**(18 U.S.C. § 1591)**

In or about May 2015, within the Southern District of California and elsewhere, defendants MICHAEL JAMES PRATT, MATTHEW WOLFE, and RUBEN ANDRE GARCIA, in and affecting interstate commerce, knowingly did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means a person, to wit, Adult Female 1 (“AF-1”), knowing and in reckless disregard of the fact

#1 VPC

1 that means of force, threats of force, fraud, coercion, and any combination of such  
2 means, will be used to cause the person to engage in a commercial sex act; in violation  
3 of Title 18, United States Code, Section 1591(a) and (b)(1).

4 **Count 2**

5 **(18 U.S.C. § 1591)**

6 In or about October 2013, within the Southern District of California and  
7 elsewhere, defendants MICHAEL JAMES PRATT, MATTHEW WOLFE, and  
8 RUBEN ANDRE GARCIA, in and affecting interstate commerce, knowingly did  
9 recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and  
10 solicit by any means a person, to wit, Adult Female 2 (“AF-2”), knowing and in reckless  
11 disregard of the fact that means of force, threats of force, fraud, coercion, and any  
12 combination of such means, will be used to cause the person to engage in a commercial  
13 sex act; in violation of Title 18, United States Code, Section 1591(a) and (b)(1).

14 **Count 3**

15 **(18 U.S.C. § 1591)**

16 In or about and between January 2015 and February 2015, within the Southern  
17 District of California and elsewhere, defendants MICHAEL JAMES PRATT,  
18 MATTHEW WOLFE, and RUBEN ANDRE GARCIA, in and affecting interstate  
19 commerce, knowingly did recruit, entice, harbor, transport, provide, obtain, advertise,  
20 maintain, patronize, and solicit by any means a person, to wit, Adult Female 3 (“AF-  
21 2”), knowing and in reckless disregard of the fact that means of force, threats of force,  
22 fraud, coercion, and any combination of such means, will be used to cause the person  
23 to engage in a commercial sex act; in violation of Title 18, United States Code, Section  
24 1591(a) and (b)(1).

25 //

**Count 4**

**(18 U.S.C. § 1594)**

Beginning on an unknown date, but no later than approximately October 2013, and continuing through the present, within the Southern District of California and elsewhere, defendants MICHAEL JAMES PRATT, MATTHEW WOLFE, RUBEN ANDRE GARCIA, and VALORIE MOSER, did combine, conspire, and agree with each other to, in and affecting interstate commerce, knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means a person—to wit, AF-1, AF-2, AF-3, Adult Female 4 (“AF-4”), and Adult Female 5 (“AF-5”)—knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means, will be used to cause these persons to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a) and (b)(1).

All in violation of Title 18, United States Code, Section 1594(c).

**FORFEITURE ALLEGATIONS**

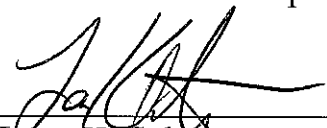
1. The allegations contained in Counts 1 through 4 above are realleged herein and incorporated as a part hereof for purposes of seeking forfeiture of property of defendants MICHAEL JAMES PRATT, MATTHEW WOLFE, RUBEN ANDRE GARCIA, and VALORIE MOSER to the United States pursuant to Title 18, United States Code, Sections 1594(d) and (e).

2. Upon conviction of the offenses in Counts 1 through 4, which involve violations of Title 18, United States Code, Sections 1591 and 1594, defendants MICHAEL JAMES PRATT, MATTHEW WOLFE, RUBEN ANDRE GARCIA, and VALORIE MOSER shall forfeit, pursuant to Title 18, United States Code, Section 1594(d) and (e), all right, title, and interest in (1) any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offense; (2) any property, real or personal, constituting or derived from, any proceeds obtained, directly

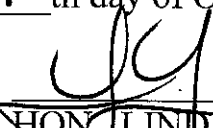
1 or indirectly, as a result of the offense. The property to be forfeited includes, but is not  
2 limited to, (a) any personal property that was used or intended to be used to commit or  
3 to facilitate the commission of the offense; and (b) any property, real or personal,  
4 constituting or derived from proceeds obtained directly or indirectly as a result of such  
5 offense.

6 3. If any of the property described above, as a result of any act or omission  
7 of defendants MICHAEL JAMES PRATT, MATTHEW WOLFE, RUBEN ANDRE  
8 GARCIA, and VALORIE MOSER, cannot be located upon the exercise of due  
9 diligence; has been transferred or sold to, or deposited with, a third party; has been  
10 placed beyond the jurisdiction of the court; has been substantially diminished in value;  
11 or has been commingled with other property which cannot be divided without difficulty,  
12 the United States shall be entitled to forfeiture of substitute property up to the value of  
13 the property described above, pursuant to Title 18, United States Code, Section 1594(d)  
14 and (e).

15  
16 This complaint is based on the attached Statement of Facts incorporated herein  
17 by reference.

18   
19 \_\_\_\_\_  
20 Lana K. Sabata  
Special Agent  
Federal Bureau of Investigation

21 Sworn to me and subscribed in my presence this 9<sup>th</sup> day of October 2019.

22   
23 \_\_\_\_\_  
24 HON. LINDA LOPEZ  
25 U.S. Magistrate Judge  
26  
27  
28

AFFIDAVIT

Lana K. Sabata, being duly sworn, states:

1. I am a special agent with the Federal Bureau of Investigation (FBI) and have been so employed since May 2008. In October 2008, the FBI assigned me to the Violent Crime and Major Offender Program in Northwest Indiana. Duties under this program focus on federal violent crime investigations including kidnapping, extortion, interstate transportation of stolen property, bank robberies, criminal gang activity and drug trafficking. Additionally, I was assigned as the Crimes Against Children (CAC) coordinator and worked child-related violations that included parental kidnapping, enticement, prostitution and child pornography. In January 2013, I transferred to the FBI's San Diego Division. I currently work on investigating crimes involving child exploitation and human trafficking. Prior to my employment with the FBI, I was a local law enforcement officer in Lincoln, Nebraska for approximately seven years, with experience in general investigations, as well as an undercover narcotics investigator. I have served in the United States Armed Forces, Air National Guard, Security Forces. This training and experience, together with my consultation and experience working with colleagues, task force officers and subject matter experts, form the basis for the opinions I express below.

Statement of Probable Cause

A. *Overview of the Conspiracy*

2. From at least 2013 through and including the present, defendants MICHAEL JAMES PRATT, MATTHEW WOLFE, RUBEN ANDRE GARCIA, and VALORIE MOSER, and others participated in a conspiracy to recruit young adult women to engage in commercial sex acts by fraud and coercion. Via the internet, members of the conspiracy recruited young women from around the country who were interested in modeling. Once the young women responded to online ads posted by the conspiracy, conspirators would advise the women that the jobs were in fact for

1 pornographic videos, not modeling gigs, and participants, or “models,” would receive  
2 approximately \$3,000 to \$5,000 for a one-day video shoot. When presented with this  
3 revised offer, many of the women initially refused, often for fear that the videos would  
4 be published on the internet and damage their personal, educational and/or professional  
5 lives in various ways.

6 3. To convince women to appear in the adult videos, members of the  
7 conspiracy assured the women that the videos would not be posted on the internet and  
8 would only be distributed outside the United States on DVD or to supposed private  
9 collectors overseas. Members of the conspiracy assured the women that their friends  
10 and families would never learn that the women had appeared in the videos. To help  
11 convince them, PRATT paid other young women working at his direction, including  
12 MOSER, to act as references or provide false assurances to the women that, if they  
13 filmed a video, the video would not be posted online.

14 4. If a woman agreed to make a video, members of the conspiracy paid to fly  
15 the woman to San Diego. MOSER’s duties included driving these women to and from  
16 the airport and San Diego-area hotels. GARCIA met with the women at the hotel along  
17 with a videographer. WOLFE initially served as the conspiracy’s videographer, before  
18 Uncharged Co-Conspirator #1 (UCC-1) took on that role. When questioned in-person,  
19 GARCIA, MOSER, WOLFE, and UCC-1 falsely assured the women their videos would  
20 not be posted on the internet. GARCIA, whose job duties included having sex with the  
21 women on camera, frequently offered the young women marijuana or alcohol in the  
22 hotel room before presenting them with a document that he and the videographer  
23 refused to let the young women keep.<sup>1</sup> After presenting the women with the document,

24  
25 <sup>1</sup> Prior to shooting the videos, at least some of the women signed a “Model/Talent  
26 Release” which stated that the producer of the video, identified as Clockwork  
27 Productions Inc. on behalf of BLL Media Inc., could use and/or publish the video for  
28 any purposes whatsoever. The release does not reference internet publication and there  
is no reference to girlsdoporn.com, pornhub.com or any other website. Some women  
also read a video-recorded statement that stated that BLL Media could use the video

1 the conspirators present in the room rushed the women to sign and/or falsely  
2 paraphrased the contents.

3 5. Members of the conspiracy paid the women approximately several  
4 thousand dollars for filming, but often less than initially promised. After filming the  
5 videos, the women typically flew home the next day. Women reported that GARCIA  
6 assaulted them before or after filming. Multiple women also reported that GARCIA  
7 and others pressured them to engage in activities outside the scope of what they had  
8 agreed to and that, when they protested, GARCIA and others threatened them with  
9 economic repercussions.

10 6. Typically, within a few months of filming, members of the conspiracy  
11 posted the videos online to websites such as girlsdoporn.com and/or girlsdotoys.com,  
12 which the FBI believes are operated by PRATT and WOLFE. These two websites offer  
13 a fee subscription service. The videos were also posted on other sites, such as the free  
14 site pornhub.com, to drive interest in and web traffic to the fee-based sites,  
15 girlsdoporn.com and girlsdotoys.com. According to financial records, the websites  
16 have generated more than \$17 million in revenue.

17 7. In 2016, multiple plaintiffs filed a civil lawsuit in San Diego Superior  
18 Court against PRATT, WOLFE, GARCIA, and others alleging that they and their co-  
19 defendants had tricked the plaintiffs into appearing in pornographic videos posted to  
20 girlsdoporn.com.<sup>2</sup> As part of the lawsuit, plaintiffs obtained MOSER's deposition and  
21 sworn statements from two additional women. Under oath, all three women described  
22

23 however BLL Media chooses. One such recording obtained by FBI made no reference  
24 of the video appearing on the internet and makes no reference to girlsdoporn.com or  
25 girlsdotoys.com.

26 <sup>2</sup> See <https://arstechnica.com/tech-policy/2019/08/at-trial-women-say-they-were-tricked-and-coerced-into-internet-porn/> (last accessed September 17, 2019); see also  
27 Case No. 37-2016-00019027-CU-FR-CTL (consolidated with Case No.: 37-2017-  
28 00033321-CU-FR-CTL and Case No.: 37-2017-00043712-CU-FR-CTL).

1 their involvement in helping PRATT, WOLFE, and GARCIA recruit women via  
2 fraudulent misrepresentations.

3 8. According to one of the women's statements, GARCIA offered to pay her  
4 to act as a reference for him, WOLFE, and PRATT by helping them recruit women to  
5 appear in pornographic videos. She said that she received between \$50 and \$200 for  
6 every reference, depending on the recruit's attractiveness and age. She said that  
7 GARCIA told her to tell prospective women that: she had previously filmed a video,  
8 which was a lie; she was from a small town and nobody ever found out about her  
9 (fictitious) video; the women would remain anonymous; and the videos would never be  
10 released on the internet or in the United States, which was a lie.

11 9. Information gathered by the FBI shows that MOSER was one of multiple  
12 women who attempted to help the conspiracy recruit young women to film. According  
13 to records provided by one young woman, Adult Female 4 (AF-4) (who is a plaintiff in  
14 the civil lawsuit), GARCIA, using an alias, repeatedly told her that her video would not  
15 be posted on the internet and would only be distributed to remote countries. To help  
16 persuade AF-4, GARCIA provided her with two female references, "Amberlyn" and  
17 "Kailyn." AF-4 texted with the latter to ask, "Is there anyway [the videos] can get back  
18 to the US?" "Kailyn" replied, "No no no you're totally fine! That's what I was worried  
19 about but there is absolutely no way anyone will find out" and later added, "Yeah so it  
20 goes out to wealthier countries; yea DVDs and stuff like that but nothing online!"

21 10. Financial records corroborate that members of the conspiracy paid  
22 "Kailyn" and two other women to help recruit video models by falsely reassuring them.  
23 Between, April 2015 and May 2016, an account controlled by PRATT made 54  
24 payments via PayPal to these three women totaling approximately \$2,275. MOSER,  
25 who did payroll records for PRATT's company BLL Media, kept expenses for the office  
26 and confirmed that PRATT or his company paid these three women for their help  
27 recruiting prospective "models."



1 B. *The Substantive Counts*

2 11. This affidavit is submitted in support of a Complaint that proposes three  
3 substantive counts for violations of 18 U.S.C. § 1591(a) and (b)(1). Those counts are  
4 submitted for conduct pertaining to AF-1, AF-2, and AF-3, which can be summarized  
5 as follows:

6 *AF-1*

7 12. According to AF-1, in May 2015, she was 20 years-old and had lost her  
8 job. She searched Craigslist for modeling jobs and located an ad for Begin Modeling.  
9 AF-1 went to Begin Modeling's website and completed an application to model with  
10 the company. Shortly after submitting the application, AF-1 received an email that  
11 disclosed that the ad was for an adult job. The email came from  
12 "jonathan@beginmodeling.com." The email indicated that the job was for a 30-minute  
13 video shoot with an attractive male actor and that no one would ever find out any of her  
14 personal information. The email indicated that the company would pay for an "all-  
15 expense" paid trip and that AF-1 would be provided with "luxurious" accommodations.

16 13. After responding to this ad, AF-1 spoke by phone with "Jonathan." To allay  
17 AF-1's concerns about doing the video, "Jonathan" provided AF-1 with the photos and  
18 telephone numbers of other female models who had made films with his company. AF-  
19 1 later identified GARCIA and "Jonathan." AF-1 was initially told that she would get  
20 \$5,000 for making the video and, shortly before she arrived, the payment was lowered  
21 to \$3,500.

22 14. After the call with GARCIA, AF-1 texted with "Kaylin." Kaylin reassured  
23 AF-1 that everything GARCIA said was true and accurate. Kaylin told AF-1 that no  
24 one would ever find out and that she'd be paid thousands of dollars. Texting with  
25 Kaylin sold AF-1 on the idea and made her feel more comfortable.

26 15. GARCIA's use of "Kaylin" to reassure AF-1 is consistent with the  
27 conspiracy's practice of paying women, including "Kaylin," to mislead female recruits.

1 AF-1's description of the Craigslist ad, Begin Modeling website, and conversations  
2 with "Jonathan" is also consistent with evidence gathered by the FBI. The FBI believes  
3 that PRATT controls the domain name for Begin Modeling's website and email  
4 addresses. In approximately June 2018, the National Center for Missing and Exploited  
5 Children advised the FBI that an anonymous caller who used the name "Hope" reported  
6 that an individual named "Jonathan" was attempting to groom minors for sex  
7 trafficking. "Hope" said that "Jonathan" worked with the business Begin Modeling,  
8 and used the website [www.beginmodeling.com](http://www.beginmodeling.com) and email address,  
9 [jobs@beginmodeling.com](mailto:jobs@beginmodeling.com). "Hope" said she spoke by telephone with "Jonathan" and  
10 that he used the telephone number 858-598-3205 (T-1). "Hope" reported that  
11 "Jonathan" was not willing to have a lawyer present when speaking about the modeling  
12 contracts, and "Jonathan" would not allow a parent or sibling to be present. When she  
13 declined the modeling offer, Jonathan became very aggressive and forceful.

14 16. The FBI obtained records from Craigslist for information related to ad  
15 postings listing T-1. The records included almost 300 ads posted using T-1, many of  
16 which also used GARCIA's email address, and personal phone (T-2). Multiple ads  
17 related to the recruitment of females for what appeared to be commercial sex work. An  
18 ad for "Cute Teen Girls Make \$5,000 Today," posted on June 2, 2014, read "Hiring  
19 good looking [sic] girls 18-21 years old for immediate work[.] We are local to San  
20 Diego and can shoot you today or tomorrow. We pay \$5,000 cash up front[.] Work  
21 with hot guys your age, over 200+ models have shot with us, speak to them about their  
22 experience with us." The email listed was [jobs@beginmodeling.com](mailto:jobs@beginmodeling.com). An ad posted  
23 three days later for "Cute & Preppy College Females," sought "Cute and preppy college  
24 females for high paying video shoots. Cash pay up front per shoot: \$3,000. Must be 18-  
25 21 years old, petite/toned, beautiful face and smile, few to no tattoos." The ad stated  
26 that ongoing shoots were available for \$3000-\$5000.

1 17. While the FBI does not know whether AF-1 saw ads just like these, the ads  
2 are consistent with AF-1's report that she first encountered the conspiracy via Craigslist  
3 ads posted for Begin Modeling and that the advertised payment was initially \$5,000.

4 18. After emailing with and speaking to "Jonathan" on the phone, a member  
5 of the conspiracy booked AF-1 a one-way plane ticket and she flew to San Diego. When  
6 she arrived, GARCIA picked her up at the airport and took her to a hotel. GARCIA  
7 said that he needed to take photos of AF-1 for "his boss" and that AF-1 needed to be  
8 naked in the photos. AF-1 reluctantly complied. GARCIA then took several photos  
9 with his cell phone and said that he sent them to his boss.

10 19. AF-1 asked if she could put her clothes back on. GARCIA said no, and sat  
11 next to her on the bed. GARCIA then began groping AF-1 and telling her how attractive  
12 she was. GARCIA forced AF-1 to kiss him. AF-1 protested but GARCIA pushed her  
13 back on the bed. GARCIA then said, "I need to take you for a test drive before  
14 tomorrow." GARCIA then pushed AF-1 down onto her back and raped AF-1. As  
15 GARCIA left, he told AF-1 not to leave the hotel room.

16 20. AF-1 cried herself to sleep and woke up the next morning to texts from  
17 GARCIA stating that AF-1 needed to go get her hair and make-up done. A woman  
18 picked up AF-1 and took her to a mall to get her hair and make-up done.

19 21. Back at the hotel, AF-1 met a camera man who used the name "Joshua."  
20 "Joshua" said that he was from New Zealand. AF-1 later identified WOLFE as  
21 "Joshua." WOLFE or another member of the conspiracy arranged for a makeup person  
22 to come to the hotel to try and cover a tattoo belonging to AF-1 and AF-1 spent an hour  
23 with this person. GARCIA then arrived at the hotel and AF-1 realized that he would be  
24 the "actor" in her video.

25 22. GARCIA's presence made AF-1 uncomfortable and distracted. After  
26 GARCIA arrived, WOLFE gave AF-1 a contact to sign. GARCIA and WOLFE stood  
27 over AF-1's shoulder once she had it and told her to hurry up because they were behind  
28

1 in filming. They said that they would tell her everything in the contract. They said that  
2 the contracts meant "she could not go off and become a porn star." Since she had no  
3 interest in becoming one, she signed the documents. All AF-1 recalls of the contract  
4 was that it had a logo for "Bubblegum Films" or "Bubblegum Media." AF-1 asked who  
5 the production company was and WOLFE and GARCIA would not tell her. AF-1 thinks  
6 they might have filmed her signing the documents and holding the money they paid her  
7 (which was only \$3,000 and not the \$3,500 they promised), but that they did not film  
8 themselves yelling at her to hurry.

9 23. After signing the papers, WOLFE took photographs of AF-1 clothed.  
10 WOLFE told her how to answer the on-camera interview and she did not use her own  
11 words. WOLFE had AF-1 read a disclaimer that she was "of sound mind and body"  
12 and he coached her through her pretending to get ready.

13 24. Before the filming began, AF-1 requested GARCIA's STD results.  
14 GARCIA refused, causing AF-1 to become emotionally distraught thinking of how he  
15 had raped her the night before. The more AF-1 requested to see his STD results,  
16 GARCIA became "nastier" and made up excuses as to why he didn't have it. AF-1 then  
17 had sex with GARCIA on film as directed by GARCIA and WOLFE.

18 25. Filming with GARCIA was frequently painful because he was aggressive  
19 and indifferent. The more AF-1 requested breaks, the more impatient he got. She  
20 recalls being told, "stop being a whiny little bitch!" AF-1 said that, when she protested,  
21 WOLFE and GARCIA would not take "no" for an answer.

22 26. When AF-1 returned home, she became depressed, hardly left her house,  
23 and struggled to act like herself so that her parents did not notice that something was  
24 wrong. Sometime after, the video was put on the internet. Someone who had found out  
25 about the video told AF-1's parents and AF-1 was kicked out of the house. AF-1's  
26 parents told her not to come back and disowned her.

1 27. After the video was publicized online, individuals harassed AF-1 on her  
2 social media accounts and she had to deactivate all of her accounts. AF-1's family were  
3 also harassed on social media, including her younger siblings. AF-1 suffered from panic  
4 attacks, anxiety, and had to receive therapy.

5 28. AF-1 said that were it not for her financial need she never would have  
6 made the video. She never would have done it for any amount of money if she had  
7 known that the video was going to be put on the internet. AF-1 said that she was  
8 promised anonymity and that is why she agreed to it.

9 29. AF-1 is a plaintiff in the civil lawsuit filed in San Diego Superior Court  
10 against PRATT, WOLFE, GARCIA, and others.

11 *AF-2*

12 30. In approximately October 2013, AF-2 had recently turned 18 and was  
13 attending college. She had some modeling experience and saw a Craigslist ad seeking  
14 models. She eventually spoke with a "Mark" at a company called "Bubble Gum  
15 Casting." AF-1 exchanged emails with "Mark" and spoke with him over the phone.  
16 She said that he had an Australian accent. (WOLFE and PRATT both have New  
17 Zealand accents, which can resemble Australian accents.)

18 31. "Mark" initially told AF-2 that she would receive \$1,500 to \$2,000 for a  
19 photo shoot, but eventually told her that the modeling was actually for adult videos. His  
20 eventual offer was for \$2,000 for five sex scenes each lasting approximately five  
21 minutes. He said that nothing would be posted online and that the videos would be  
22 produced in DVD format for a solo owner overseas. "Mark" offered to put AF-2 in  
23 touch with other models who had worked with them in the past. At the time, AF-2  
24 needed money to stay in school. She decided to make money doing the videos based  
25 on being told they would only be seen overseas.

26 32. A member of the conspiracy arranged for AF-2 to fly from out of state to  
27 San Diego. At the San Diego airport, "Mark" picked up AF-2 up in a white 7 series  
28

1 BMW along with GARCIA. Traffic records show that, in May 2015, officers  
2 encountered a white BMW registered to BLL Media that was occupied by PRATT and  
3 GARCIA. "Mark" had an accent consistent with being either from either Australia or  
4 New Zealand. At this time, the FBI believes that PRATT most likely was the man using  
5 the alias "Mark."

6 33. "Mark" filmed AF-2 at the airport supposedly for "behind the scenes"  
7 footage. At the hotel, AF-2 went to a room where "Mark" and GARCIA took video  
8 equipment. AF-2 had her hair and makeup done and recalls being filmed signed a  
9 contract. She did not get an opportunity to read the contract and "Mark" told her that it  
10 said that the videos would not end up on the internet and would only be sold overseas.  
11 AF-2 received payment from Bubble Gum Casting before the filming started. In the  
12 hotel room, AF-2 learned that GARCIA would be the male actor in the video.

13 34. AF-2 reported that scenes with GARCIA were painful and that she asked  
14 GARCIA to stop and he refused. During filming, "Mark" and GARCIA instructed AF-  
15 2 to perform additional sex acts beyond what she had negotiated. When she protested,  
16 "Mark" or GARCIA told her that she had to do it or they would not take her back to the  
17 airport.

18 35. Although she was only 18, members of the conspiracy offered AF-2  
19 alcohol during filming. AF-2 felt intimidated by "Mark" and GARCIA and felt that she  
20 was not free to leave. She based these feelings, in part, on the fact that the hotel room  
21 door was blocked by boxes and equipment, and by the difference in size between herself  
22 and "Mark" and GARCIA. AF-2 was very worried that  
23 "Mark" or GARCIA would cancel her flight home and she would be stranded in San  
24 Diego because she did not have money to pay for her own flight.

25 36. In approximately January 2014, AF-2 learned that her video was posted  
26 online. Following the release, she was harassed and left school. She tried to contact  
27 "Mark" by email and got no response.

1 37. In August 2017, however, AF-2 unexpectedly received a Facebook  
2 message from an account named “Andre Garcia,” which AF-2 understood to be  
3 GARCIA. The message read, “miss you baby,” and included still photographs of AF-  
4 2’s video from four years prior that prominently featured her naked and exposed. AF-2  
5 was never friends with GARCIA and perceived his message as designed to harass and  
6 intimidate her. The FBI believes it is reasonably likely that GARCIA’s harassment of  
7 AF-2 was in response to the civil plaintiffs adding her name to their list of witnesses at  
8 or around the time the “Andre Garcia” Facebook account contacted her, as multiple  
9 parties associated with the civil lawsuit have reported harassment and intimidation. For  
10 example, one of the women whom the conspiracy paid to recruit female models stated  
11 in a sworn deposition that members of the conspiracy offered her money not to testify  
12 at the civil trial. The FBI has also gathered evidence that, when the father of one of the  
13 conspiracy’s victims contacted “Jonathan” via email to request they take down his  
14 daughter’s email, he received a response from PRATT’s San Diego-based attorney who  
15 represents him in the civil lawsuit. The lawyer sent the father a cease-and-desist letter  
16 to which PRATT’s lawyer attached naked photos of the man’s daughter.

17 *AF-3*

18 38. Like AF-2, AF-3 had done some modeling and looked to Craigslist for  
19 potential modeling work. Around January 2015, AF-3 saw a San Diego Craiglist ad for  
20 models that offered up to \$6,000 and gave AF-3 the impression that the ad involved  
21 traditional clothing-type modeling. AF-3 responded to the ad and heard back from  
22 “Jonathan.” “Jonathan” eventually disclosed that the job was really for making adult  
23 sex videos. He offered AF-3 \$5,000 to film a solo scene and scenes with a male actor.  
24 “Jonathan” told AF-3 that the video was for a private overseas buyer that would be  
25 made into a DVD and not posted online. He assured AF-3 that her family and friends  
26 would not find out about it and gave AF-3 a list of models who previously worked for  
27 him as a reference.

1 39. AF-3 felt pressure to make money and decided to film the video based on  
2 the representation that nobody in the United States would see it. Jonathan told AF-3  
3 that she would be allowed to pick from two male actors to work with. Jonathan asked  
4 AF-3 to meet in person at a downtown San Diego apartment building. AF-3 identified  
5 GARCIA as the man who went by "Jonathan" who met her downtown. GARCIA took  
6 photographs of AF-3 that day.

7 40. A few days later, GARCIA contacted AF-3 and offered to film at the Hard  
8 Rock Hotel in San Diego in February 2015. On the day of the shoot, AF-3 met GARCIA  
9 and a man who used the name "Isaac" at the same downtown apartment building. AF-  
10 3 identified WOLFE as "Isaac." AF-3 was reassured that none of her friends or family  
11 would ever find out that she did the video. Later that evening, AF-3 was driven from  
12 the apartment building to the Hard Rock Hotel and taken to a hotel room. GARCIA  
13 needed photographs of AF-3 to send to his boss and AF-3 was asked to change into a  
14 different outfit for those photos. At the hotel, AF-3 learned that GARCIA would be the  
15 male actor. She was not given a choice.

16 41. At the hotel, WOLFE and GARCIA gave AF-3 documents to sign. AF-3  
17 recalled WOLFE telling her that the videos would belong to their company, thus  
18 distribution would be controlled, and not to worry about the video getting out. AF-3  
19 tried to read the contract but was told that would take too much time. GARCIA paid  
20 AF-3 \$4,000 in cash.

21 42. Before filming began, AF-3 received direction to sit on the bed and say  
22 that she was nervous but excited to do the video and that she had never done anything  
23 like it before. WOLFE or GARCIA told AF-3 to say that she was not under the  
24 influence of alcohol or drugs.

25 43. As the shoot went on, GARCIA took off his clothes and instructed AF-3  
26 to perform oral sex on him. AF-3 said that she had not agreed to that and did not want  
27 to. WOLFE and GARCIA pressured her, and GARCIA got aggressive and thrust his  
28



1 penis into AF-3's mouth with force. AF-3 pushed him away and told him, "you're  
2 choking me," or words to that effect. GARCIA resumed thrusting into AF-3's mouth  
3 with force and she again pushed him away. GARCIA physically moved AF-3 from the  
4 floor to the bed and continued to be rough. Throughout the filming, AF-3 was rough  
5 and made AF-3 so uncomfortable that GARCIA stopped filming to complain about AF-  
6 3 making faces because of how much GARCIA was hurting her. At that point AF-3  
7 wanted to stope and leave, but did not know how to extricate herself. She noted that  
8 the lighting equipment was blocking the exit door. AF-3 said she wanted to stop, which  
9 led to GARCIA and WOLFE getting frustrated. Based on their body language,  
10 demeanor, and tone of voice, AF-3 felt that GARCIA and WOLFE were in control and  
11 they might hurt her if she did not comply. AF-3 felt like she was not free to stop and  
12 leave.

13 44. At one point during filming, AF-3 noticed that there was blood on the bed.  
14 She was told it was fine and that she would get used to it. The shoot took approximately  
15 five hours. Afterwards, GARCIA tried to flirt with AF-3, but she told him that she  
16 needed to leave. GARCIA offered to drive AF-3 back to her car, which AF-3 accepted.  
17 As they were driving, however, GARCIA drove past AF-3's car and parked in a nearby  
18 lot. He then locked the car doors and told AF-3 that she was pretty and should be his  
19 girlfriend. He offered to take her out to dinner and shopping, and said she made him  
20 really horny. AF-3 asked GARCIA to take her back to her car. GARCIA then tried to  
21 kiss AF-3 and make physical advances toward her by climbing over the center console.  
22 AF-3 could not unluck her door, so she attempted to evade GARCIA by climbing into  
23 the back seat and telling him that she was not interested and wanted to leave. AF-3 tried  
24 to open the rear door, but it was also locked and she could not figure out hwo to unlock  
25 it before GARCIA got on top of her in the back seat. GARCIA then physically  
26 prevented AF-3 from exiting the vehicle.

1           45. In the backseat, GARCIA tried to make out with AF-3 and she pushed him  
2 away. GARCIA wound up straddling AF-3, who was wearing a dress. GARCIA moved  
3 AF-3's underwear and penetrated her against her will. GARCIA then returned to the  
4 front seat and started driving toward AF-3's car, even though AF-3 demanded he let her  
5 out. AF-3 eventually got to her car.

6           46. AF-3 did not initially tell anyone about the assault. She was scared and  
7 embarrassed and thought that, if she reported it, people would find out about the video.  
8 Eventually, somebody sent a link of the video to people AF-3 knew. She was harassed  
9 and ridiculed as a result. AF-3 would never have agreed to appear in the video if she  
10 knew it would be released where her friends and family could find out.

11 C. *The Conspiracy*

12           47. Multiple women have reported experiences similar to AF-1, AF-2, AF-3,  
13 and AF-4. A fifth young woman, AF-5, told the FBI that she responded to a Craigslist  
14 ad for modeling work when she was 21 and heard back from employees with  
15 "beginmodeling.com." She has provided copies of some of the emails she received  
16 from this entity to the FBI. (As mentioned earlier, PRATT controls  
17 beginmodeling.com.) AF-5 reported that, eventually, the person she was speaking with  
18 said that the job was really for an adult film.

19           48. AF-5, like the other women, was told that the video would only be  
20 distributed on DVD and only overseas. AF-5 learned in advance that she would have  
21 to sign a lengthy contract and requested a copy in advance to review. She recalls that  
22 the person she was speaking with, who she thinks may have been called "Jonathan,"  
23 replied that she was asking a lot of questions and he had never had a "girl" that asked  
24 so many questions. AF-5 says that "Jonathan" would not send her the contract  
25 beforehand and made her feel bad for asking.

26           49. Jonathan offered to put AF-5 in touch with a woman named "Sierra" as a  
27 reference. AF-5 repeatedly communicated with "Sierra," who told her the filming  
28

1 would last about two hours and provided additional reassurance. "Jonathan" told her it  
2 would last one to three hours.

3 50. On the day she was supposed to film, AF-5 cancelled. AF-5 told  
4 "Jonathan" that she did not want to do it and had changed her mind. "Jonathan"  
5 responded that he knew AF-5's name, where she lived, and that he was going to sue her  
6 for the fees she had cost. He also then offered AF-5 \$6,000 to do the shoot. AF-5  
7 agreed to do the film to avoid being sued and for the extra money. She was told that  
8 she would receive \$6,000 to complete four sexual position lasting a few minutes each,  
9 with breaks in-between to clean up and retouch, and that shoot would not last more than  
10 three hours. Prior to the shoot, Jonathan asked AF-5 to do things that she refused.  
11 Despite this agreement, during the shoot, AF-5 was told she needed to do things that  
12 she had not agreed before she would be paid or allowed to leave.

13 51. AF-5's shoot occurred on June 11, 2016 in Dana Point, California. AF-5  
14 has an email confirmation for the hotel. The day before, in the "talent gigs" section of  
15 the Orange County craigslist site, an ad entitled, "Pro Make Up Artist Needed  
16 Tomorrow," sought a make-up artist at 2:00 P.M. in Dana Point for a single model. The  
17 contact information provided by Craigslist for this ad listed GARCIA's email and phone  
18 numbers alongside his first name, "Ruben."

19 52. On the day of the shoot, AF-5 met GARCIA and UCC-1 at the Dana Point  
20 hotel. Once in the hotel room, a makeup artist did AF-5's makeup. After her makeup  
21 was done, UCC-1 took charge and handed AF-5 a contact. UCC-1 filmed AF-5 signing  
22 the contract, which AF-5 estimates was about two inches thick. AF-5 started to read  
23 the contact and UCC-1 told her, "we don't have time for that" and directed her to sign  
24 in multiple places. AF-5 estimates that took five minutes between when UCC-1  
25 presented her with the contact to the time when she had completed signing it. AF-5  
26 recalled seeing "girlsdoporn" on the contract and the phrase "rights to the video." AF-  
27 5 asked where the video was going and UCC-1 said, "where Jonathan told you." AF-5  
28

1 confirmed with UCC-1 that the video was not going online. AF-5 says that UCC-1  
2 repeatedly reassured her the video would not go online. AF-5 had questions, but UCC-  
3 1 indicated that they did not have time to review it. AF-5 requested a copy of the  
4 contract and UCC-1 said that "Jonathan" would send her a copy. AF-5 never received  
5 a copy.

6 53. After AF-5 signed the contact, UCC-1 filmed an interview where he  
7 directed her how to answer. During filming, GARCIA caused AF-5 pain and she was  
8 told to stop making "pain faces" or to face away from the camera. At the end of the  
9 shoot, GARCIA or UCC-1 told AF-5 that she needed to perform oral sex without a  
10 condom. AF-5 had not agreed to that and she did not want to do it. GARCIA and UCC-  
11 1 told AF-5 that this was the ending scene and she would not get paid without  
12 completing it. AF-5 felt like she could not leave the hotel room and would have done  
13 everything else for nothing if she did not get paid. After the filming occurred, however,  
14 AF-5 received only \$4,000. She was told that "Jonathan" directed that she only receive  
15 \$4,000 because it cost them \$2,000 when she cancelled her first shoot.

16 54. Two or three months after AF-5 filmed her video, "Sierra" contacted her  
17 in tears to report that her (Sierra's) video had been posted online and people had seen  
18 it. AF-5 said that Sierra and her videos were posted on girlsdoporn.com. Sierra told  
19 AF-5 that she got \$50 for every time she contacted AF-5. This amount is consistent  
20 with the PayPal records obtained by the FBI.

21 55. The FBI has interviewed multiple women who describe experiences  
22 similar to those of AF-1, AF-2, AF-3, AF-4, and AF-5. The FBI is still in the process  
23 of identifying all the women recruited, filmed, coerced, and defrauded by the  
24 conspiracy, as well as the proceeds made from these activities. The FBI is also still  
25 gathering corroborating evidence. Some of this corroborating evidence includes  
26 statements made by the conspirators in the civil proceedings.

1           56. As part of the civil litigation, WOLFE testified under oath at a deposition.  
2 During the deposition, of which the FBI has a partial transcript, he said the following:

3           a. WOLFE, GARCIA, and PRATT worked for a company, BLL  
4 Media (which PRATT controlled), that used Craigslist and the website  
5 beginmodeling.com to recruit women.

6           b. GARCIA and PRATT communicated with “prospective models”  
7 who responded to ads places on Craigslist. In particular, GARCIA used the alias  
8 “Jonathan” and the email address jobs@beginmodeling.com.

9           c. BLL Media, Inc. paid women to serve as references during the  
10 recruiting process, including the three women identified by the FBI in the PayPal  
11 records described above.

12           d. PRATT, WOLFE, and GARCIA previously operated out of the  
13 downtown apartment building identified by AF-3.

14           e. MOSER worked for BLL Media doing “general office admin” and  
15 she also picked up and transported models.

16           f. Adult videos of the women appeared on GirsDoPorn.com..

17           57. As part of the civil lawsuit, WOLFE also testified under oath at trial.  
18 According to news reports,<sup>3</sup> on October 2, 2019, WOLFE testified to the following:

19           a. WOLFE filmed over 100 adult videos for GirlsDoPorn since  
20 moving from New Zealand to San Diego in 2011 to work for PRATT.

21           b. WOLFE is still currently uploading videos using amateur models to  
22 GirlsDoPorn.com.

23           c. The current, October 2019, contract provided to these models does  
24 not disclose that the videos will be posted online and WOLFE does not believe that  
25 contract references www.GirlsDoPorn.com, which PRATT and WOLFE own.

26  
27 <sup>3</sup> See <https://www.courthousenews.com/porn-company-employee-says-recruiting-continues-during-fraud-trial/> (last accessed October 9, 2019).

1 d. Contracts presented to amateur models since June 2016 do not  
2 mention websites, even though the videos are posted online.

3 e. GARCIA was still recruiting models as recently as the last week of  
4 September 2019.

5 f. WOLFE was put in charge of the model's contracts after the lawsuit  
6 was filed and they are stacked on his desk.

7 g. WOLFE told models the videos would go online if they asked, but  
8 would not provide more details. He said most women did not ask where their videos  
9 would be published.

10 h. PRATT's whereabouts are currently unknown, but he is still  
11 operating the business from outside San Diego.

12 58. The FBI has also obtained a partial transcript of MOSER's deposition and  
13 observed part of her trial testimony. According to these statements, during her  
14 employment, MOSER wanted to make additional money by earning a commission for  
15 recruiting "models." PRATT met with MOSER to coach her on what to say, and what  
16 not to say, during recruiting calls. PRATT gave MOSER the contact information for  
17 female recruits who were attractive, but did not want to appear in adult films. He thought  
18 the women might be more responsive to another woman.

19 59. MOSER understood that the purpose of the call was to convince women  
20 to appear in pornographic videos. PRATT told MOSER to tell the women that their  
21 travel, hotel, and food would be paid for and that the videos would not include any  
22 "weird stuff." PRATT told MOSER to tell the women that their names would remain  
23 private and their videos would go straight to DVD in another country like Australia.  
24 PRATT also told MOSER to exaggerate the money the women would make and to get  
25 them on a plane as quickly as possible. MOSER estimated that, once women agreed to  
26 film a video, they were flown to San Diego within five or six days to help prevent them  
27  
28

1 from changing their mind. MOSER said that multiple women she dealt with had  
2 received less money than they were promised.

3 60. MOSER knew the statements she made reassuring women about their  
4 privacy were false and knew that the videos would be available on girlsdoporn.com. In  
5 fact, before she started trying to supplement her salary by recruiting women to appear  
6 in the videos, MOSER had already received complaints from women that their videos  
7 were exposed online.

8 61. As part of her office duties, MOSER helped set up hotel rooms for film  
9 shoots. She was told to book the rooms using an alias and to use an alias in general.  
10 WOLFE also told MOSER to use a P.O. Box at a Postal Annex, but to write "Unit 423"  
11 instead of "#423" to make it appear more legitimate. MOSER's duties included driving  
12 women to and from the airport. MOSER estimates that she transported around 100  
13 women. During drives back to the airport, many women complained that they had not  
14 received the money they were promised and they did not understand the "legal jargon"  
15 in the contract they received at the hotel. MOSER said that multiple women told her  
16 they had smoked marijuana with GARCIA at the hotel. After the women's videos  
17 appeared online, many contacted MOSER to express how upset they were and to try to  
18 get the videos taken down. MOSER said that PRATT, WOLFE, and GARCIA told her  
19 to block those women from future contacts.

20 62. MOSER said that PRATT told her to use Google Hangouts to hide her true  
21 phone number when communicating with female recruits. Google Hangouts offers  
22 group chat, VoIP, and video calls. Pursuant to PRATT's instructions, MOSER obtained  
23 an anonymized VoIP phone number to communicate with them. (GARCIA also appears  
24 to have used an anonymized VoIP phone number in the Craigslist ads described above.)  
25 PRATT told MOSER to use an alias when communicating with women recruits.  
26 MOSER sometimes used the alias "Anna," but often forgot and used her true name.  
27 MOSER said that WOLFE used the alias "Ben Fox" and that PRATT used the names  
28

1 “Jordan” and “Mark.” (WOLFE’s deposition corroborates that PRATT used these  
2 aliases.) MOSER said that PRATT told her to tell recruits that the video production  
3 company was Plus One Media, when in fact it was BLL Media. Plus One Media looked  
4 like a legitimate company when searched on the internet and would, as MOSER said,  
5 give the models a sense of security. The credit card processor was also set up to show  
6 the name Plus One Media, rather than BLL Media, when payments needed to be made.  
7 According to MOSER, Plus One Media and BLL Media were only two of many  
8 business names that PRATT and WOLFE used or controlled. The conspirators’ use of  
9 fake names, fake phone numbers, and fake business names served to make it harder for  
10 the women deceived by recruiters like PRATT, GARCIA, and MOSER to seek redress  
11 when their videos ultimately went online.

12 63. Once the videos went online, many women experienced harassment that  
13 included anonymous social media accounts sending clips of their videos to the women’s  
14 social media contacts. The women’s names and addresses were also posted online  
15 around the time the video went up on a website connected to Pratt, pornwikileaks.com.  
16 Distraught, many women reached out to the contacts who recruited them, including  
17 MOSER. At PRATT’s direction, MOSER forwarded any text message or complaint she  
18 would have received to PRATT. MOSER testified that she informed PRATT of any  
19 complaints she received “every time.”

20 64. At the civil trial, MOSER discussed several text messages exchanged  
21 between her and PRATT involving complaints MOSER had received from upset  
22 models. Although PRATT dismissed the women’s complaints as “crazy,” MOSER  
23 knew that PRATT deceived the women from the outset by falsely telling them, and  
24 having others tell them, that their videos would only go to DVDs in Australia.

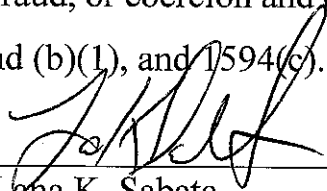
### 25 **Conclusion & Request for Sealing**

26 65. At this time, I believe that WOLFE, GARCIA, MOSER, PRATT, UCC-1  
27 and their coconspirators are unaware of the FBI’s identification and investigation of  
28



1 them. Because I believe that premature disclosure of this affidavit could result in flight  
2 and the destruction of evidence, I request that it be sealed until further order of the  
3 Court.

4 66. I submit that the evidence described above shows that WOLFE, GARCIA,  
5 MOSER and their coconspirators persuaded women to engage in commercial sex acts  
6 by repeatedly deceiving them about the nature of the sex acts, the compensation they  
7 would receive for performing said acts, and the nature and scope of the distribution and  
8 publication of said acts. I also submit that this evidence shows that members of the  
9 conspiracy used coercion and threats, including threats not to pay women, not to provide  
10 plane tickets home, or to publicly shame them to cause the women to engage in said  
11 acts. For these reasons, I submit there is probable cause to arrest WOLFE, GARCIA,  
12 and MOSER for sex trafficking of people by force, fraud, or coercion and conspiring to  
13 do the same, in violation of 18 U.S.C. §§ 1591(a) and (b)(1), and 1594(c).

14  
15   
16 Lana K. Sabata  
17 Special Agent  
18 Federal Bureau of Investigation

19 Sworn to me and subscribed in my presence this 8<sup>th</sup> day of October 2019.

20  
21   
22 HON. LINDA LOPEZ  
23 U.S. Magistrate Judge  
24  
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26  
27  
28