

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

UNITED STATES OF AMERICA)	CR. NO. <u>6:18-957</u>
)	
)	18 U.S.C. § 1591(a)(1)
)	18 U.S.C. § 1594
vs.)	18 U.S.C. § 1956(h)
)	18 U.S.C. § 1956(a)(1)(A)(i)
)	18 U.S.C. § 1956(a)(1)(B)(i)
)	18 U.S.C. § 981(a)(1)
)	18 U.S.C. § 982(a)(1)
ORIANNA MARTINEZ)	28 U.S.C. § 2461(c)
SULAY MATOS)	
SELVIN ERNESTO MONROY-MELGAR)	
CHRISTIAN CARRIEL)	

SEALED INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

That beginning at a date unknown to the Grand Jury, but from at least in or about July 23, 2018, and continuing through the date of this indictment, in the District of South Carolina, and elsewhere, the Defendants, **ORIANNA MARTINEZ** and **SULAY MATOS**, and others both known and unknown to the Grand Jury, did knowingly, in and affecting interstate and foreign commerce, conspire, combine, confederate, and agree with each other to commit offenses against the United States, including: recruiting, enticing, harboring, transporting, providing, obtaining, advertising, maintaining, patronizing, or soliciting by any means persons, namely Victim One and Victim Two, whose identity is known to the Grand Jury, and did benefit financially and by receiving anything of value from participation in a venture which engaged in such acts, knowing and in reckless disregard of the fact, that means of force, threats of force, fraud and coercion would be used to cause Victim One and Victim Two to engage in a commercial sex act in violation of

Title 18, United States Code, Section 1591(a)(1);

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but beginning at least as early as 2017, and continuing up to and including the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, **ORIANNA MARTINEZ, SELVIN ERNESTO MONROY-MELGAR, and CHRISTIAN CARRIEL**, knowingly and willfully did combine, conspire, agree and have tacit understanding with others, both known and unknown to the Grand Jury,

(a) to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is prostitution, in violation of Title 18, United States Code, Section 2242, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and further knowing that the transactions were designed, in whole and in part, to conceal and disguise the nature, the location, the source, the ownership, and the control of the property, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(b) to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is prostitution, in violation of Title 18, United States Code, Section 2242, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and further knowing that the transactions were intended to promote the carrying on of a specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE

SPECIFIED UNLAWFUL ACTIVITIES/ PROSTITUTION AND TRAFFICKING:

Upon conviction for one or more violations of Title 18, United States Code, Section 1594 as charged this Indictment, the Defendants, **ORIANNA MARTINEZ, SULAY MATOS, SELVIN ERNESTO MONROY-MELGAR, and CHRISTIAN CARRIEL**, shall forfeit to the United States any property, real or personal, that was used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offenses, and any property, real or personal, which constitutes or is derived from any proceeds obtained, directly or indirectly, as a result of such offenses, pursuant to Title 18, United States Code, Section 1594 and Title 28, United States Code, Section 2461(c).

MONEY LAUNDERING:

Upon conviction for violation of Title 18, United States Code, Section 1956 as charged in this Indictment, the Defendants, **ORIANNA MARTINEZ, SELVIN ERNESTO MONROY-MELGAR, and CHRISTIAN CARRIEL**, shall forfeit to the United States any property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. § 1956, as charged in the Indictment, or any property traceable to the offense.

PROPERTY:

The property to be forfeited includes, but is not limited to, the following:

Forfeiture Judgment:

A sum of money equal to all proceeds the Defendants obtained, directly or indirectly, from the offenses charged in this Indictment, and all interest and proceeds traceable thereto, and a sum of money equal to all property involved in or traceable to the money laundering offense charged in the Indictment, and all interest and proceeds traceable thereto.

SUBSTITUTE ASSETS:

If any of the above-described property, as a result of any act or omissions of the Defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with a third party;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of Defendants up to an amount equivalent to the value of the forfeitable property;

Pursuant to Title 18, United States Code, Sections 981(a)(1), 982(a)(1), and 1594, and Title 28, United States Code, Section 2461(c).

A True Bill

REDACTED

FOREPERSON

Sherril A. Lydon
SHERRI A. LYDON (CFS/twd)
United States Attorney