

PT:AMC/IJ
F.# 2013R01103

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 18, U.S.C.,
§§ 1952, 1956(a)
and 1956(h))

VINCENT LOMBARDO and
MELISSA LOMBARDO,
also known as "Melissa Hodge,"

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

MYLES MAHADY, being duly sworn, deposes and states that he is a New York City Police Department ("NYPD") Detective, cross-designated as a federal officer, duly appointed according to law and acting as such.

In or about and between January 2011 and July 2013, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VINCENT LOMBARDO and MELISSA LOMBARDO, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and intentionally conspire with others to (1) conduct financial transactions, to wit: deposits and transfers of funds, in and affecting interstate and

foreign commerce, which transactions involved the proceeds of specified unlawful activity, to wit: interstate and foreign travel or transportation to distribute the proceeds of, and to promote, manage, and establish the Promotion of Prostitution in the Third Degree, in violation of New York Penal Law 230.25, with the intent to distribute the proceeds of and promote the carrying on of said specified unlawful activity, in violation of Title 18, United States Code, Section 1952; and (2) commit money laundering with respect to the aforesaid offense, in violation of Title 18, United States Code, Section 1952, with the intent to promote the carrying on of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a).

(Title 18, United States Code, Sections 1952, 1956(a), 1956(h))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I have been a Police Officer and a Detective of the NYPD for more than fifteen years. I am currently assigned and cross-designated to the El Dorado Task Force at the U.S. Homeland Security Investigation ("HSI"), New York Field Office.

¹ Because this affidavit is submitted for the limited purpose of establishing probable cause for a search warrant, I have not set forth each and every fact learned during the course of the investigation.

My responsibilities include, among other things, (a) detecting and deterring money laundering and (b) identifying and reducing human trafficking and prostitution. For several years, I have conducted and participated in a number of investigations of prostitution activity operated under the guise of "escort service" agencies. During those investigations I participated in the execution of numerous search warrants, conducted surveillance and interviewed witnesses, including confidential sources and cooperating witnesses. I have interviewed numerous prostitutes and clients, also known as "johns," who pay prostitutes to engage in sexual activity with them. I have also interviewed several individuals who have owned, operated, and/or been employed by escort services that conducted prostitution activities.

2. I am working on this investigation with fellow NYPD officers and other law enforcement officials, including special agents of U.S. Immigration and Customs Enforcement ("ICE"). The contents of documents and statements discussed herein are reported in sum and substance and in part, except where otherwise indicated.

3. Under 18 U.S.C. § 1952(a)(1), it is a violation of federal law to travel in interstate or foreign commerce, or to use any facility in interstate or foreign commerce, with the intent to distribute the proceeds of any unlawful activity, and

thereafter distribute or attempt to distribute the proceeds of unlawful activity. Under 18 U.S.C. § 1952(a)(3), it is a violation of federal law to travel in interstate or foreign commerce, or to use any facility in interstate or foreign commerce, with the intent to promote an unlawful activity, and thereafter promote or attempt to promote an unlawful activity. Pursuant to 18 U.S.C. § 1952(b)(i)(1), "unlawful activity" includes "prostitution offenses in violation of the laws of the State in which they are committed."

4. Under New York Penal Law 230.25, Promoting Prostitution in the Third Degree is a felony. According to this provision of the New York Penal Law, a person is guilty of Promoting Prostitution in the Third Degree when he or she "knowingly advances or profits from prostitution by managing, supervising, controlling or owning, either alone or in association with others . . . a prostitution business or enterprise involving prostitution activity by two or more prostitutes . . ."

5. Under 18 U.S.C. § 1956(a)(1)(A)(i), whoever, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, knowingly and intentionally conducts those financial transactions in interstate or foreign commerce, with intent to promote the

carrying on of specified unlawful activity is guilty of the federal offense of money laundering. In this case, violations of 18 U.S.C. §§ 1952(a)(2) and 1952(a)(3) constitute the specified unlawful activity by reference to, and incorporated in, 18 U.S.C. §§ 1956(c)(7) and 1961.

6. Under 18 U.S.C. § 1956(h), it is a federal offense to conspire to violate, among other statutes, 18 U.S.C. § 1956(a)(1)(A)(i).

BACKGROUND ON APHRODITE COMPANIONS PROSTITUTION INVESTIGATION

7. Since approximately July 2012, I and other detectives and agents have been investigating an escort agency involved in prostitution named Aphrodite Companions ("Aphrodite"). As will be described more fully below, the defendants VINCENT LOMBARDO² and MELISSA LOMBARDO, also known as

² A review of official records related to VINCENT LOMBARDO's criminal history reveals that on July 24, 1991, he was convicted by guilty plea in Nassau County Court of Criminal Sale of a Controlled Substance in the Third Degree, in violation of New York State Penal Law Section 220.39 and sentenced to a term of imprisonment of from one to three years. Also, on July 24, 1991, VINCENT LOMBARDO was convicted by guilty plea in Nassau County Court of Criminal Possession of a Weapon in the Third Degree, in violation of New York State Penal Law Section 265.02(1) and was sentenced to a term of incarceration of one year. On September 25, 2000, VINCENT LOMBARDO was convicted by guilty plea in Nassau County Court of Criminal Possession of a Controlled Substance in the Third Degree, in violation of New York State Penal Law Section 220.16(12) and was sentenced to a term of imprisonment of 4 ½ to 9 years. VINCENT LOMBARDO was released on parole on October 22, 2004 on the later case and discharged from parole on

"Melissa Hodge," (collectively the "LOMBARDOS") are the owners and operators of Aphrodite and are directing a prostitution ring from their home. The LOMBARDOS have received hundreds of thousands of dollars in proceeds from the prostitution activity in bank accounts, through cash deposits and wire transfers.

8. Aphrodite operates in part through an internet-based website, www.aphroditecompanions.com (the "Aphrodite Website"). The Aphrodite Website includes links to web pages depicting prostitutes that include photographs of each woman, often partially dressed or nude and often posed in sexually explicit positions. The Aphrodite Website displays the schedules for the prostitutes, including the city in which a particular prostitute is available, the days and hours when a prostitute is available and the hourly rate that Aphrodite charges its clients for time with the prostitutes. Some of the prostitutes frequently travel to different cities in different states so they can be available to be hired for prostitution activity. The hourly rate for the prostitutes is often listed as several hundred dollars per hour. The Aphrodite Website classifies each prostitute by various categories including "Sun Girl," "Moon

October 22, 2005. On August 5, 2009, VINCENT LOMBARDO was arrested and charged with marijuana possession with intent to sell by the Broward County (FL) Sheriff's Department, but it appears these charges were dismissed on September 15, 2009.

Girl," and "Star Goddess." The classification assigned to a particular prostitute determines the hourly rate charged by the prostitute, which include rates of several hundred dollars per hour or several thousand dollars per day. The Aphrodite Website provides telephone numbers for the johns to call Aphrodite and arrange appointments with the prostitutes. When the johns sign up with Aphrodite there is a screening process in which the johns must provide certain pedigree information, including the john's full name and employment, before being permitted to hire any of the prostitutes.

9. In exchange for advertising the prostitutes' services and screening and arranging meetings with the johns, the prostitutes pay a percentage of the proceeds they receive from the johns to Aphrodite - often 30% to 40% of the total. Aphrodite obtains its percentage of the proceeds of any prostitution activity largely through cash deposits and wire transfers by the prostitutes made directly into accounts controlled by the LOMBARDOS. Prostitutes are instructed to deposit Aphrodite's share of the proceeds within approximately one day of being paid by the john. Some of the proceeds of the prostitution business deposited into the Aphrodite bank accounts is used to pay business expenses of Aphrodite to promote its

continuing operation. Other proceeds of the prostitution business are used to pay the personal expenses of the LOMBARDOS.

10. Aphrodite furthers its prostitution activities through its relationship with an internet-based review website called "The Erotic Review," which is also known as "TER", located at www.theeroticereview.com, in which johns can read and post reviews of experiences with different prostitutes. An individual can sign on to the TER website, join its service, and obtain a login code to gain access to detailed reviews of the prostitutes. The reviews often contain sexually explicit descriptions of the sexual acts performed by the prostitutes. On the TER website, each prostitute is assigned a unique "TER Number." Under each TER Number, the prostitutes have a profile that describes their physical appearance including height, weight, hair color and also includes a list of sexual acts that the prostitute is willing to engage in. The prostitutes often use their TER Number to advertise their illicit services. The johns can visit the TER website to read the reviews of the prostitutes before soliciting them for services. Aphrodite itself is also reviewed on the TER website. On Aphrodite's own website, prostitutes frequently list their TER Number and provide a hyperlink that allows an Aphrodite website user to jump to the TER website simply by clicking on the link with a computer mouse.

11. The investigation has revealed, primarily through a review of emails, that Aphrodite regularly offers discounts to customers who post reviews of escorts after an appointment. These reviews are usually favorable to the escorts with a view to boosting business for the prostitute and in turn the agency. Additionally, Aphrodite has developed a relationship with a content administrator within the TER community. In exchange for free sex with Aphrodite prostitutes, this individual posts inflated positive reviews of certain prostitutes and negative reviews of prostitutes who are no longer associated with Aphrodite, but instead with competing agencies.

A. The LOMBARDOS Use of Proceeds to Pay For Their Florida Home, As Well As Bank and Other Records, Demonstrate the LOMBARDOS' Connection to The Aphrodite Business Entities

12. The defendants VINCENT LOMBARDO and MELISSA LOMBARDO are husband and wife. The LOMBARDOS reside at 4876 NW 25th Way, Boca Raton, Florida (the "Florida Home"). Bank records for an affiliated company, Aphrodite Productions Ltd., list the Florida Home as its office location. A copy of the warranty deed for the Florida Home from public records indicates that the Florida Home was sold on May 2, 2008 by two owners to VINCENT LOMBARDO and Melissa Hodge, which is another name used by MELISSA LOMBARDO. The original mortgage for the Florida Home was held by Orange Financial Corporation of Boca Raton, Florida in an amount

of \$351,000, and the borrowers are listed as VINCENT LOMBARDO and Melissa Hodge (i.e., MELISSA LOMBARDO). A new mortgage on the Florida Home was obtained by the LOMBARDOS in September 2011 through Wells Fargo. Credit Reports from Equifax, Experian and Trans Union indicate that VINCENT LOMBARDO and Melissa Hodge (i.e., MELISSA LOMBARDO) are the mortgagors for the Florida Home. According to bank records, a TD Bank account for Aphrodite Productions Ltd. (the "Aphrodite TD Bank Account") was opened by the defendants VINCENT LOMBARDO and MELISSA LOMBARDO on January 16, 2013, and each presented Florida driver's licenses listing the Florida Home as their residential address. Bank records indicate that the mailing address for the Aphrodite TD Bank Account is the Florida Home.³ According to bank records, in August 2009, Melissa Hodge opened a business account in the name of Aphrodite Productions at Chase Bank and provided as a business address the Florida Home (the "Aphrodite Chase Bank Account"). Later that same month, VINCENT LOMBARDO was added to this account as an authorized signatory and is identified as the vice-president of Aphrodite Productions Ltd. In addition, a Wells Fargo bank account in the name of Aphrodite Productions Ltd. (the "Aphrodite Wells Fargo Account") lists the Florida Home for its

³ The legal address for the Aphrodite TD Bank Account is listed at 5020 Sunrise Highway, Suite 223, Massapequa, New York, a location that appears to provide office and mail services.

mailing address. As of June 19, 2013, records of Florida Power & Light identify VINCENT LOMBARDO as the customer of record at the Florida Home.

13. Surveillance of the Florida Home was conducted on two dates in May 2013. On May 9, 2013 at approximately 12:35 p.m., VINCENT LOMBARDO was observed leaving the Florida Home and traveled to a nearby fitness center. The surveillance team recognized VINCENT LOMBARDO from a Florida Department of Motor Vehicles photograph that had been provided to them.

14. On May 13, 2013, at approximately 12:47 p.m., a gray sedan BMW bearing Florida registration number AYDC65 was observed parked in front of the location. The gray sedan BMW is registered to VINCENT LOMBARDO at the Florida Home.

15. Based on the above information, I believe that the LOMBARDOS have used and continue to use the Florida Home as their residence and utilize the address for the Florida Home to conduct business activities related to the Aphrodite Companions escort service.

B. Results from a Search Warrant for an Aphrodite Email Account Reveal that Aphrodite is Engaged in Prostitution Activity

16. On or about August 28, 2012, United States Magistrate Judge Larry A. Kurdle of the U.S. District Court for the Northern District of New York issued a search warrant for the

email account pamelaaphrodite@aol.com (the "Pamela AOL Account"). Based on the investigation, I believe the Pamela AOL Account is operated by the LOMBARDOS, the owners of the Aphrodite Companions escort service. "Pamela" is an alias used by the owners of Aphrodite to communicate with prostitutes, employees and clients of the Aphrodite Companions escort service. The account information for the Pamela AOL Account lists the account holder as Melissa Hodge (i.e., LOMBARDO) at the Florida Home. The account information further lists MELISSA Hodge LOMBARDO as the responsible party, and the payment method as a credit card #4741657000154206.

17. Execution of the search warrant on the Pamela AOL Account resulted in the recovery of several thousand emails that had been either received by, or sent from, the Pamela AOL Account. The content of the emails revealed that the Pamela AOL account was being used to monitor, direct and manage the operation of Aphrodite. The emails were also used to recruit and hire new prostitutes, direct the activities of prostitutes, and manage the internet-based advertising of Aphrodite.

18. In an email dated February 8, 2012 that was forwarded to the Pamela AOL Account from another Aphrodite email account, sender@aphroditecompanions.com, Aphrodite's prostitutes were instructed that "[d]eposits are to be made before noon the

following business day. Failure to do so will result in not getting any appointments until the deposit is made." Based on my experience I believe Aphrodite was instructing its prostitutes to deposit the proceeds of prostitution activity by 12:00 p.m. the day after the prostitute was paid by a john. Violations of the rule would result in any prostitutes not getting referred new work from Aphrodite.

19. Numerous emails sent from the Pamela AOL Account contain information that appears to be part of the signature that is used when emails are sent from the Pamela AOL Account. This signature information includes the following information: "Annie Assistants to Pamela Number [855 area code phone number] Companions can also text Annie or for schedules & touring assistants on [561 area code phone number] . . . Have a Smart Phone? Then add whatsapp from your apps . . . to your contacts . . . you can't text the above number without this app. . . . Main Office Numbers [an 877 area code telephone number and a 888 area code telephone number] if these lines are busy we have additional numbers listed on our website to avoid delays . . . Our Client Feed Back: [web address connected to the TER Website] . . . Agency Profile on TER: [web address connected to the TER Website]." Based on my experience, I believe that the LOMBARDOS, sending emails under the "Pamela" alias provide information for

clients and prostitutes to contact Aphrodite at a variety of telephone numbers. Furthermore, Aphrodite specifically provides information on how to access the TER Website, which provides sexually explicit descriptions by the johns who use the prostitutes from Aphrodite. Based on my experience, this demonstrates that the LOMBARDOS are aware that the escorts working for Aphrodite are engaging in prostitution.

20. In an email dated May 20, 2012 from the Pamela AOL Account to another Aphrodite email account, Email Account #1, a prospective new escort who sent an application for employment to Aphrodite is being discussed. The email from the Pamela AOL Account instructs the Aphrodite employee "She must send a full photo of her face and body connected that we can see other wise she can keep it moving. We dont [sic] need trash girls or drug girls or girls that arent [sic] GFE. It is our way or they dont [sic] work with us." On May 22, 2012, Email Account #1 writes to the Pamela AOL Account "SHE JUST CALLED ME BACK, SHES NOT BBBJ SO SHES DONE HUN." Based upon my experience, the Pamela AOL Account was being used to screen a new possible escort for Aphrodite and that when the escort informed Aphrodite that she was not willing to perform "bbbj," a term I understand to mean a "bare back blow job," which I further understand means oral sex without a condom, she was not hired. I believe this means that Aphrodite's escorts

are prostitutes who will not be permitted to work for Aphrodite unless they participate in sexual activity for money. In other emails I have reviewed, prospective new escorts have forwarded reviews from TER about themselves containing explicit descriptions of sexual activity that they are willing to perform for money.

21. The following examines a series of emails by two of Aphrodite's prostitutes ("Escort #1" and "Escort #2") that demonstrate the manner in which Aphrodite was operated. These emails demonstrate that Escort #1 and Escort #2 work for Aphrodite, engage in prostitution activity through financial institutions, and have transferred the proceeds of prostitution activity to Aphrodite accounts controlled by the LOMBARDOS.

a. In an email dated January 28, 2011 at approximately 1:49 a.m., Escort #1 appears on a list of prostitutes working for the agency. Beside her name was a phone number for Escort #1. The list of prostitutes was sent from an email account aphroditeny1@aol.com to infoacgirls@aol.com and then forwarded to several email accounts, including the Pamela AOL Account.

- b. In an email dated April 8, 2011 at approximately 6:10 a.m. from aphroditelnyc@aol.com to the Pamela AOL Account, there is a reference to an electronic transfer of funds by Escort #1 to Aphrodite: "04/07/2011 Quickpay credit Chase Quickpay 2039613936 from [Escort #1] \$200.00". A review of Chase bank records revealed that in 2011 there were an additional 14 electronic transfers totaling \$2,200.00 from Escort #1 to Aphrodite. A review of Wells Fargo bank records has revealed 4 electronic transfers totaling \$1,195.50 during December 2012 from a Wells Fargo account held by Escort #1 to the Aphrodite Wells Fargo Account.
- c. In an email dated February 8, 2012, Escort #1 responded to the above-quoted February 8, 2012 email regarding the timing of deposits by Aphrodite's prostitutes. In that email, under the subject title of "Re: Ladies please you must pay attention to this," Escort #1 wrote: "Pam, I'm sorry but would it be ok that I make my deposits at latest after my classes? Let me know. Sometimes the ATM machine doesn't take

cash deposits at night. Like last night for example. Thank you, [Escort #1]."

- d. In an email dated February 2, 2012, Email Account #2 sent an email to the Pamela AOL Account with a list of TER Numbers for some of the prostitutes appearing on the Aphrodite website. In that email, Escort #1 and her TER Number are listed. The same TER Number also appears on the Aphrodite Website.
- e. In an email dated February 27, 2012, Escort #2 asked to be included in a "big event" that was described in an earlier email, in Miami, Florida, with a "group of politicians, lawyers and many other important business men [who] are looking for companions Dinner, mingling and intimate time is included within these hours Depending on your hourly rate you will get from \$3000 to \$8000 for those hours. However that is just an estimate. Each of you will have a date and each of them will decide later if they wish to extend this apt with each of you or not." On February 29, 2012, at approximately 6:01 p.m. an email sent from the

Pamela AOL Account listed a number of women who were available for the Miami event, which included a listing for Escort #2, "[Escort #2] (Brunette) \$3000 must be flown from NYC 8 hour min (Sun Girl)." I believe this series of emails indicated that Escort #2 was recruited to travel from New York City⁴ to Miami to participate in prostitution activity at a rate corresponding to her classification as a "Sun Girl" by Aphrodite.

f. In an email dated March 11, 2012, Escort #1 agreed to travel to Miami by replying "Yes for [Escort #1]" to an email from the Aphrodite AOL Account dated February 29, 2012 "regarding a party in Miami for a group of politicians, lawyers and many other important businessmen are looking for companions" The email further explained that "most of your time will be spent at this dinner but if they choose to keep you full [sic] 8 hours and would like some intimate time then I couldn't see it being more

⁴ According to subscriber records for Time Warner, which provides high speed data service to her apartment, Escort #2 lives in Manhattan.

than a[n] hour or two most" In an email dated February 27, 2012 from the Pamela AOL Account to another Aphrodite email account, infoacgirls@aphroditecompanions.com, under the subject title: "THESE ARE THE GIRLS THAT THEY WANT, WE WILL FLY THEM IN 2ND WEEK OF MARCH," Escort #1 is included on the list of prostitutes attending the event. In an email dated February 29, 2012 at approximately 6:01 p.m. from the Pamela AOL Account to EMAIL ACCOUNT #1, with the subject line: "Ladies and rates for Tuesday March 13," a list of the prostitutes who were to attend the event in Miami that included Escort #1. Escort #1 was listed and described as "(Brunette) \$3600 must be flown in from NYC 8 hour min (Sun Girl)." I believe this series of emails indicated that Escort #1 was recruited to travel from New York City to Miami to participate in prostitution activity at a rate corresponding to her classification as a "Sun Girl" by Aphrodite.

g. In an email dated June 20, 2012, the Pamela AOL Account received an email listing of what appear

to be appointments for various prostitutes on that date. The list included Escort #2 as having had one appointment for \$400.00 on June 19, 2012. Within two days, Escort #2 transferred \$120.00 (30% of \$400) into the Wells Fargo account of Aphrodite.

- h. In an email dated June 27, 2012 to the Pamela AOL Account under the subject title "Re: SCHEDULE FOR NEXT WEEK," Escort #1 stated that "I want ideas for touring and I was planning on doing Long Island also next week. Let me know." I believe this email refers to Escort #1 requesting information from Aphrodite about locations to which Escort #1 could travel for several days or more at a time to engage in prostitution activity. Further, I believe Escort #1 was informing Aphrodite that she planned to travel to Long Island to engage in prostitution activity.
- i. In an email dated July 3, 2012, at approximately 6:23 p.m., Escort #1 responded to an email from the Pamela AOL Account under the subject title "RE: LOOKING FOR TWO LADIES FOR MULTI DATE TRIPS

WITH CLIENTS. ONE TRIP REQUIRES A PASSPORT."

The underlying email from the Pamela AOL Account stated that two different clients were looking for companions to travel with them to two different locations. The first was a businessman from London who was looking for someone to travel with him to South Africa for one week, for which the prostitute would be paid approximately \$3,000.00, which in a later related email was corrected to \$3000.00 per day. The second trip was described to be with a Russian businessman who was going to the Sturgis motorcycle festival in South Dakota for one week. It states that the rate had yet to be determined but that all travel expenses would be paid for, presumably by the john. In an email dated July 5, 2012 at approximately 10:47 a.m., the Pamela AOL Account responded to Escort #1 regarding the South African trip by stating "You do understand he is only offering 2000 pounds which is \$3000 US dollars per day and you would get 70% of that and he would of course cover all expenses, including round trip flight". In an

email dated July 6, 2012 at approximately 02:31 a.m. Escort #1 responded: "yes I understand :)". Based upon my experience, I believe that Escort #1 was being informed by the Aphrodite agency that she would have to remit 30% of the proceeds of her prostitution activity to Aphrodite.

- j. In an email dated July 20, 2012, the Pamela AOL Account received an email listing of what appear to be appointments for various prostitutes. The list included Escort #2 having one appointment for \$400.00 on July 19, 2012. The next day, July 20, 2012, Escort #2 transferred \$120.00 into the Wells Fargo account of Aphrodite.
- k. In an email dated July 27, 2012 the Pamela AOL Account received an email listing of what appear to be appointments for various prostitutes. The list included Escort #2 as having had one appointment for \$400.00 on July 26, 2012. On July 30, 2012, Escort #2 transferred \$120.00 into the Wells Fargo account of Aphrodite.
- l. In an email dated August 1, 2012, the Pamela AOL Account received an email listing of what appear

to be appointments for various prostitutes. The list included Escort #2 as having had two appointments for \$400.00 each on July 31, 2012. On August 6, 2012, Escort #2 transferred \$240.00 into the Wells Fargo account of Aphrodite.

C. TER Reviews Demonstrate that the Escorts Working for Aphrodite are Engaged in Prostitution Activity

22. I have examined several TER reviews for the TER Numbers associated with Escort #1 and Escort #2, using an undercover account with TER. The reviews were accessed by searching TER for "Aphrodite Companions" and then searching the reviews for "[Escort Name] - Aphrodite Companions." These TER reviews reveal that the escorts regularly engage in sexual activity with the johns. Moreover, based on the Aphrodite Website and the content of emails recovered from the Pamela AOL account, TER reviews are promoted by Aphrodite to potential clients to further their illicit prostitution business.

23. Escort #1's TER profile, which is also linked from the Aphrodite Website, states that, among other things, Escort #1 offers: "blow job- yes without condom"; "cum in mouth-yes spits it out"; and "multiple pops allowed." Based upon my experience in investigating prostitution activity I believe Escort #1's profile advertises an offer for oral sex and that multiple sex

acts per hourly encounter are permitted. Escort #1's rate is listed at \$400.00 per hour. One review, dated January 2013, posted by an individual using the alias "Heelsandbras" on TER stated that the "BBBJ was great" and that "[a]fter bursting my nut, we cleaned up and talk some more while I got dressed. Very nice gal worth a visit".⁵ Based upon my experience in investigating prostitution activity, I believe this review refers to illicit sexual activity in that a "BBBJ," which I understand to mean "bare back blow job," is a common reference to oral sex that is performed by a prostitute without the use of a condom, and that "bursting my nut" is a common reference to ejaculation by the john. A second review, dated December 2012, posted by an individual using the alias "Sonny" contains similar language. The reviewer describes oral sex, stating Escort #1 was ". . . sucking it like a champ" and "she gave me another awesome bbbj". A third review dated April 2013 posted by an individual using the alias "Dirtymidget" stated "She opened the door to her private apartment, greeted me with DFK and then led me to the shower". Based upon my experience, the term "DFK" refers to the phrase "deep French kissing," which is an abbreviated phrase commonly used by johns to indicate a form of physical contact that a

⁵ The TER reviews by the johns are individually numbered on the TER website.

particular prostitute is willing to engage in. The reviewer continued ". . . she stripped for me and began bbbj, I was about to explode then told me to CIM, so I did". Based upon my experience the reviewer (a) referred to oral sex when he used the phrase "bbbj"; (b) referred to ejaculation when using the word "explode"; and (c) the phrase CIM, or "come in mouth," is a commonly used abbreviated reference by johns to indicate that a prostitute is willing to allow a john to ejaculate in a prostitute's mouth during a sexual encounter.

24. There are many other reviews of Escort #1 on TER. As of July 9, 2013, there were approximately fifty-seven TER reviews posted regarding Escort #1 under the unique identifier TER #160483. The first review posting is dated October 2010.

25. I have examined several TER reviews for the TER Number associated with Escort #2, using an undercover account with TER. The reviews were accessed by searching TER for Escort #2 and prostitutes connected to the Aphrodite website. In addition, Escort #2's webpage on the Aphrodite Website also refers to the same TER Number. A review from April 2013 posted by an individual using the alias "blazeallwayz" described an encounter with Escort #2: ". . . she made her way down to my boxers to remove them and start giving me an excellent slow and soft bbbj." In another review dated January 2013, an individual

using the alias "NYMKCS" stated "Escort #2 is available through an agency that I have used before, agency is very professional and organized, typical two call system," and further described having engaged in sexual activity with Escort #2, stating that he had received "[o]ne of the best blowjobs I ever had Then she got the condom and we went at it like crazy. First missionary and kissing passionately, then doggy and finally sideways".

C. Escort #1 Travels to Dubai for Aphrodite

26. Further investigation reveals that Escort #1 has traveled to the city of Dubai in the United Arab Emirates ("UAE") for Aphrodite. An internet Google search conducted on May 10, 2013, of the terms "[Escort #1] Aphrodite Companions Dubai" resulted in a link to a website, Website #1, which stated that Escort #1 of Aphrodite would be in Dubai, United Arab Emirates, from October 16, 2012 to October 21, 2012. Website #1 also contained a description of Escort #1 that resembles the Aphrodite website description of her. It also states that her breasts are enhanced, as stated under Escort #1's TER Number on the TER website. The posting also stated that "[Escort #1] is now in Dubai and available 24 hours while visiting. [Escort #1] is a beautiful upscale European Escort from the States. She will be available for in-call and out call to 5 star hotels only.

[Escort #1] is full GFE and offers a very erotic encounter. Don't miss her while in Dubai" The advertisement was posted by Aphrodite and was signed "Pamela." Notably, the advertisement provided a hyperlink to the TER website to check the reviews of Escort #1 under her TER Number.

27. Travel records revealed that Escort #1 departed New York for Tel Aviv on May 27, 2013 and was scheduled to return on June 8, 2013. On June 8, 2013, Escort #1 was interviewed by me after arriving from Israel at John F. Kennedy International Airport in Queens, New York. A review of Escort #1's passport showed an entry stamp for the UAE for October 17, 2012 and an exit stamp for October 22, 2012, which corresponds to the above-described 2012 UAE trip. During the interview, Escort #1 did not admit to engaging in prostitution during the trip but stated that she went to Dubai to attend a "shopping conference" and that she worked for an employer named Pamela.

D. Proceeds of Prostitution are Directed into Aphrodite Controlled Accounts Which are Used to Further Promote Prostitution Activity.

28. A review of banks accounts controlled by the LOMBARDOS and connected to Aphrodite, described above, have been used to receive the proceeds of prostitution activity. Those funds were, in turn, used to pay business expenses for Aphrodite and to pay personal expenses of the LOMBARDOS.

29. The Aphrodite Wells Fargo Account was opened on July 13, 2011. Since the opening of this account to April 2013, approximately \$1,042,763.09 has been deposited into it. Between January 15, 2013 and April 2013, four mortgage payments for the Florida Home were made from the Aphrodite Wells Fargo Account and a related Wells Fargo savings account (two from each account) totaling \$14,933.46. In addition, during the same period four payments related to a BMW vehicle were made from the same Wells Fargo savings account that made the mortgage payments totaling \$2,479.06. Two of the payments appear to be bank payments related to the purchase of the vehicle, and two payments appear to be repair or service bills.

30. The Aphrodite TD Bank Account was opened on January 16, 2013. Since that time approximately \$68,893.00 in cash deposits have been made into the account. Each of the deposits was typically small (a few hundred dollars or less), and these occurred at multiple branches in several states. The deposits are often followed by ATM withdrawals in Boca Raton, Florida. Based upon my investigation, such conduct is consistent with consistent with known methods of remitting prostitution proceeds (similar to the method described with regard to Escort #2, supra at 22-23).

31. All of the accounts listed below were used to pay for services essential to the maintenance and growth of the prostitution agency. Based on my investigation, the more heavily advertised prostitution agencies are usually the most financially successful. The following accounts routinely made payments to VibeMedia, Backpage.com and Dark Side Productions (DSP). All three entities are well known advertising venues for prostitution agencies.

a. The Aphrodite Chase Bank Account #825807969 was opened on August 6, 2009. From January 1, 2011 to September 27, 2011, the account received cash deposits of approximately \$308,320.00. During the period from July 2, 2010 to June 20, 2011, Aphrodite paid DSP \$37,042.00 from this account. From July 1, 2010 to July 14, 2011, Aphrodite paid \$19,240.00 to Backpage.com from this account. From September 9, 2010 to July 25, 2011, Aphrodite paid \$3,975.00 to Vibemedia from this account.

i. Similar to the Aphrodite TD Bank Account, described supra at 28, the deposits made into the Aphrodite Chase Account are in small amounts and are made from multiple

different branches, consistent with known methods of remitting prostitution proceeds.

ii. Between September 17, 2010 and March 16, 2011, five mortgage payments totaling 17,715 for the residence located at 4876 NW 25th Way, Boca Raton, FL 33434 - THE Florida Home - were made from the Aphrodite Chase Account to Bank of America.

- b. As noted above, supra at 10, a Wells Fargo Bank account in the name of Aphrodite Productions Ltd. lists the Florida Home for its mailing address. The account, which is #8226750035, shows numerous cash deposits totaling in excess of \$1,042,783.14, and regular incoming wire transfers from Escort #1 and Escort #2. The account is also used to make payments on vehicles and to make mortgage payments for the residence at 4876 NW 25th Way, Boca Raton, Fl 33434 - the Florida Home. The account was further used to pay hundreds of dollars to Backpage.com for advertising on January 10, 2013, January 11, 2013, and January 16, 2013.
- c. TD Bank account #4269046516 was opened on January 16, 2013 under the company name Aphrodite Productions Ltd., and is still open. The TD account shows cash deposits

in excess of \$68,892.15 over a period of approximately 120 days. The account was also used to pay for advertising at Backpage.com. The opening documents are signed by MELISSA Lee Hodge LOMBARDO and VINCENT LOMBARDO. Florida driver's licenses were provided by both signers as proof of identity. The account was opened in branch #818 in Boca Raton. The legal address provided for Aphrodite Productions Ltd. was 5020 Sunrise Highway, Suite 223, Massapequa Park, New York 11758. The account has recorded \$68,893.00 in cash deposits from opening through June 2013. The deposits are typically small in amount and occur at multiple branches, and are shortly thereafter followed by ATM withdrawals in Boca Raton, Florida.

- d. Citibank account #9134715048 was opened under the names of VINCENT LOMBARDO and MELISSA Lee LOMBARDO on January 11, 2012. The account was closed on November 30, 2012. VINCENT LOMBARDO and MELISSA Lee LOMBARDO signed the account opening documents and provided as their residence and mailing address 4876 NW 25th Way, Boca Raton, FL 33434 (i.e., the Florida Home). The account was opened in Citibank branch #FLA/92, located in Boca Raton, Florida. VINCENT LOMBARDO is listed as working

for "Kancos," and MELISSA Lee LOMBARDO is listed as a homemaker. The contact number for both is listed as (561) 451-6760 - a telephone number that appears on multiple e-mails from "Pamela" at aphroditecompanions.com. I have done various Google searches, and found that this telephone number appears in employment advertisements seeking prostitutes. The Citibank account recorded approximately \$114,726.84 in cash deposits over the life of the account. The total amount of cash withdrawals during this period totaled \$101,223.54.

CONCLUSION

32. Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause to believe that the defendants VINCENT LOMBARDO and MELISSA LOMBARDO, knowing that the property involved in financial transactions represented the proceeds of some form of unlawful activity, did knowingly and intentionally conspire to conduct financial transactions, to wit: deposits and transfers of funds, in and affecting interstate and foreign commerce, which involved the proceeds of specified unlawful activity, to wit: deposits and transfers of funds, in and affecting interstate and foreign commerce, which transactions involved the proceeds of specified

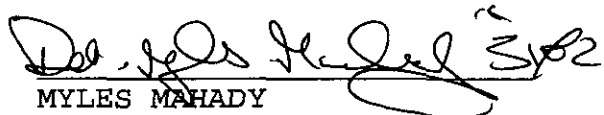
unlawful activity, to wit: interstate and foreign travel or transportation to promote, manage, and establish the Promotion of Prostitution in the Third Degree, in violation of New York Penal Law 230.25, and money laundering with respect to the Promotion of Prostitution, in violation of Title 18, United States Code, Section 1952, with the intent to promote the carrying on of specified unlawful activity, in violation of Title 18, United States Code, Sections 1952 and 1956(a). Accordingly, warrants for the arrest of the defendants VINCENT LOMBARDO and MELISSA LOMBARDO are requested.

33. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including this complaint and the arrest warrants. I believe that sealing these documents is necessary because this case is an ongoing investigation. Based upon my training and experience, I have learned that criminals actively search for criminal affidavits and complaints via the Internet, and disseminate them to other criminals as they deem appropriate, e.g., by posting them publicly through online forums. Specifically in this investigation I have reviewed emails from the Pamela AOL Account in which there are discussions about law enforcement activities that indicate that the targets are aware of law enforcement

investigative techniques and methods to avoid detection.
Premature disclosure of the contents of this complaint and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

WHEREFORE, your deponent respectfully requests that warrants be issued for the arrest of the defendants VINCENT LOMBARDO and MELISSA LOMBARDO so that they may be dealt with according to law.

IT IS FURTHER REQUESTED that all papers submitted in support of this application, including the complaint and arrest warrants, be sealed until further order of the Court.



MYLES MAHADY
Detective
New York Police Department

Sworn to before me this
~~15th~~ day of July, 2013
16th

This Complaint shall be maintained under seal until further order
of the Court.