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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

13MJ2205

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAN HARALD PORTOCARRERO (1),
 aka Leo,
ERIK PORTOCARRERO (2), aka Bo,
 aka The Clam Eater,
AMIR MOKAYEF (3),
JOSEPH BARRIOS (4), aka JB,
YOUNG HEE KOH (5),
 aka Ace, aka Sonny,
RANDALL LEE IRWIN (6), aka Tyler,
LARRY NEIL GOLD (7), aka Cat,
CHARLES EDWARD SULLIVAN (8),
MICHAEL CHRISTOPHER IACO (9),
EMED G. SIDAROS (10),
 aka Action Ed,
ISAAC PETE GHARIBEH (11),
DUNZMY JUNE NGUYEN (12),
TODD MICHAEL HEFLIN (13),
HOWARD ALAN BLUM (14),
MICHAEL JOHN MASSEY (15),
SALVATORE GIACOMO GROPPA (16),
NILESH KUMAR AMBUBHAI PATEL (17),
 aka Neil,
BENJAMIN JOHN WILLIAM WEBER (18),
MACHO SPORTS INTERNATIONAL
CORP. (19),

Defendants.

Case No. _____
COMPLAINT FOR VIOLATIONS OF:

Title 18, U.S.C., Secs.
1962(c)&(d) - Racketeering
**Conspiracy to Conduct Enterprise
Affairs (RICO Conspiracy);**
Title 18, U.S.C., Sec. 1955 -
Illegal Gambling Business;
Title 18, U.S.C., Secs.
981(a)(1)(C), 1955(d), and 1963;
and Title 28, U.S.C., Sec.
2461(c) - Criminal Forfeiture

The complainant, being duly sworn, declares under penalty of

1 perjury that the following is true and correct:

2 Introductory Allegations

3 THE ENTERPRISE

4 1. At all times material to this Complaint:

5 a. Defendants JAN HARALD PORTOCARRERO, aka Leo, ERIK
6 PORTOCARRERO, aka Bo, aka The Clam Eater, AMIR MOKAYEF, JOSEPH
7 BARRIOS, aka JB, YOUNG HEE KOH, aka Ace, aka Sonny, MACHO SPORTS
8 INTERNATIONAL CORP., and others constituted an "enterprise," as
9 defined by Title 18, United States Code, Section 1961(4) (hereinafter
10 referred to as "MACHO SPORTS"), that is, a group of individuals and
11 a corporation and legal entity associated in fact.

12 b. MACHO SPORTS was engaged in, and its activities
13 affected, interstate and foreign commerce. MACHO SPORTS was
14 headquartered in Lima, Peru, and it operated Internet websites,
15 including www.machosports.com and www.betmacho.com, hosted on servers
16 primarily located outside the United States. MACHO SPORTS operated
17 within the United States by, among other things, offering, conducting,
18 and facilitating unlawful computer and telephone service-based sports
19 gambling. MACHO SPORTS also operated toll-free telephone services to
20 facilitate sports gambling and to take sports bets.

21 c. MACHO SPORTS constituted an ongoing organization, whose
22 members functioned as a continuing unit, for the common purpose of
23 achieving MACHO SPORTS' objectives.

24 OBJECTIVES OF THE ENTERPRISE

25 2. MACHO SPORTS' objectives included the following:

26 a. Enriching its leaders, members, and associates through
27 extortionate debt collection, an illegal gambling business,
28 transmission of wagering information, bookmaking, using telephones and

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Bookies

c. MACHO SPORTS had various bookmakers ("bookies"), such as AMIR MOKAYEF (who operated primarily in the Southern District of California) and JOSEPH BARRIOS, aka JB (who operated primarily in the Central District of California). The bookies were responsible for recruiting customers, paying off winning bets, and collecting on losing bets. Bookies, such as MOKAYEF and BARRIOS, also often managed their own network of bookmakers ("sub-bookies"), who recruited and dealt with customers.

Sub-Bookies

d. Each sub-bookie was responsible for his or her own "package," which refers to all the customer accounts managed by that sub-bookie. Sub-bookies recruited customers, paid off winning bets, collected on losing bets, and delivered payments to the managing bookie.

Runners for MACHO SPORTS

e. MACHO SPORTS used "runners" who dealt directly with customers on behalf of its various bookies. These runners, such as RANDALL LEE IRWIN, aka Tyler, and LARRY NEIL GOLD, aka Cat, handled customer payments and collections.

Collectors for MACHO SPORTS

f. MACHO SPORTS also employed "collectors," who specialized in more aggressive measures to obtain payment on gambling debts, including intimidation, threats, and violence.

METHODS AND MEANS OF THE RACKETEERING CONSPIRACY

4. In furtherance of the racketeering conspiracy charged in Count 1, MACHO SPORTS utilized the following methods and means, among others:

1 a. To further the objectives of evading law enforcement
2 and enriching its members, employees, and associates, MACHO SPORTS
3 operated its headquarters in Lima, Peru, and located the physical
4 platform for its Internet operations outside the United States.

5 b. Bookies and sub-bookies recruited customers in the
6 Southern District of California and elsewhere. Then they supplied the
7 customers with an account number and password for accessing their
8 gambling accounts on MACHO SPORTS' websites. Bookies and sub-bookies
9 instructed their customers that they could place bets with their
10 bookmaker, or by calling MACHO SPORTS' toll-free numbers, or through
11 their online accounts on the MACHO SPORTS websites.

12 c. MACHO SPORTS typically extended credit to new
13 customers, so they could begin sports betting without pre-funding
14 their accounts. MACHO SPORTS also provided further extensions of
15 credit to existing customers, so that those customers could wager
16 larger amounts of money than their prior extensions of credit allowed.

17 d. MACHO SPORTS used facilities in interstate and foreign
18 commerce, such as telephones and Internet websites, to facilitate its
19 illegal bookmaking and gambling activities.

20 e. To further the objectives of ensuring prompt payment
21 as well as enriching MACHO SPORTS, the enterprise fostered a violent
22 reputation about its treatment of delinquent customers. To this end,
23 and because MACHO SPORTS could not rely on the legal system for debt
24 collection, the enterprise used intimidation, threats, and violence
25 against its customers, especially when customers were late in paying
26 their gambling debts.

27 f. MACHO SPORTS laundered many of its illegal proceeds by
28 inducing customers to pay their gambling losses to various entities

1 that appeared to be unrelated to MACHO SPORTS, such as check-cashing
2 businesses. MACHO SPORTS members would later obtain the funds, or a
3 portion thereof, from these collaborating entities, and in this way
4 concealed the illicit nature of the funds.

5 Count 1

6 (RACKETEERING CONSPIRACY)

7 5. Paragraphs 1 through 4 are realleged and incorporated by
8 reference herein.

9 6. Beginning at least as early as 2002 and continuing up to and
10 including June 6, 2013, within the Southern District of California and
11 elsewhere, defendants JAN HARALD PORTOCARRERO, aka Leo, ERIK
12 PORTOCARRERO, aka Bo, aka The Clam Eater, AMIR MOKAYEF, JOSEPH
13 BARRIOS, aka JB, YOUNG HEE KOH, aka Ace, aka Sonny, MACHO SPORTS
14 INTERNATIONAL CORP., and others, being persons employed by and
15 associated with MACHO SPORTS, an enterprise which engaged in, and the
16 activities of which affected, interstate and foreign commerce,
17 knowingly and intentionally conspired to violate Title 18,
18 United States Code, Section 1962(c), that is, to conduct and
19 participate, directly and indirectly, in the conduct of MACHO SPORTS'
20 affairs through a pattern of racketeering activity, as defined below,
21 and through the collection of unlawful debt, as defined below.

22 a. The phrase "pattern of racketeering activity," as
23 defined by Title 18, United States Code, Sections 1961(1) & (5) and
24 as used in this Complaint, refers to multiple acts indictable under
25 the provisions of Title 18, United States Code, and multiple acts
26 chargeable under State law and punishable by imprisonment for more
27 than one year, including:

28 i. 18 U.S.C. § 894 (extortionate debt collection);

1 PORTOCARRERO, aka Leo, ERIK PORTOCARRERO, aka Bo, aka The Clam Eater,
2 AMIR MOKAYEF, JOSEPH BARRIOS, aka JB, YOUNG HEE KOH, aka Ace, aka
3 Sonny, RANDALL LEE IRWIN, aka Tyler, LARRY NEIL GOLD, aka Cat, CHARLES
4 EDWARD SULLIVAN, MICHAEL CHRISTOPHER IACO, EMED G. SIDAROS, aka Action
5 Ed, ISAAC PETE GHARIBEH, DUNZMY JUNE NGUYEN, TODD MICHAEL HEFLIN,
6 HOWARD ALAN BLUM, MICHAEL JOHN MASSEY, SALVATORE GIACOMO GROPPPO,
7 NILESH KUMAR AMBUBHAI PATEL, aka Neil, BENJAMIN JOHN WILLIAM WEBER,
8 and MACHO SPORTS INTERNATIONAL CORP. knowingly and intentionally
9 conducted, financed, managed, supervised, directed, and owned all and
10 part of MACHO SPORTS, an illegal gambling business involving sports
11 bookmaking, which gambling business was a violation of the law of the
12 State of California in which it was conducted (that is, in violation
13 of California Penal Code, Section 337a), and which involved at least
14 five persons who conducted, financed, managed, supervised, directed,
15 and owned all and part of MACHO SPORTS, and which remained in
16 substantially continuous operation for a period in excess of thirty
17 days and had a gross revenue of at least \$2,000 in any single day; in
18 violation of Title 18, United States Code, Section 1955.

19 Forfeiture Allegation 1

20 (RACKETEERING CONSPIRACY FORFEITURE)

21 10. The allegations contained in Count 1 and paragraphs 1
22 through 4 are realleged and by their reference fully incorporated
23 herein for the purpose of alleging forfeiture to the United States of
24 America under Title 18, United States Code, Section 1963.

25 11. As a result of the violation of Title 18, United States
26 Code, Section 1962, as alleged in Count 1, and pursuant to Title 18,
27 United States Code, Section 1963, defendants JAN HARALD PORTOCARRERO,
28 aka Leo, ERIK PORTOCARRERO, aka Bo, aka The Clam Eater, AMIR MOKAYEF,

1 JOSEPH BARRIOS, aka JB, YOUNG HEE KOH, aka Ace, aka Sonny, and MACHO
2 SPORTS INTERNATIONAL CORP. shall forfeit to the United States: (a) any
3 and all interest said defendants acquired and/or maintained in
4 violation of Title 18, United States Code, Section 1962; (b) any and
5 all interest in, security of, claim against, property right of any
6 kind affording a source of influence over, and/or contractual right
7 of any kind affording a source of influence over any and all
8 enterprises which said defendants established, operated, controlled,
9 conducted, and/or participated in the conduct of, in violation of
10 Title 18, United States Code, Section 1962; and (c) any and all
11 property constituting, and/or derived from, any proceeds said
12 defendants obtained, directly and/or indirectly, from racketeering
13 activity and/or unlawful debt collection in violation of Title 18,
14 United States Code, Section 1962, including but not limited to:

15 a. Bank of America account number 01703-40000 in the name
16 of Mokayef Capital, Inc., which was opened by defendant AMIR MOKAYEF
17 as the President of Mokayef Capital, Inc., on or about February 28,
18 2005;

19 b. Wells Fargo Bank account number 73479200 in the name
20 of Amir Mokayef Separate Property Trust, which was opened by defendant
21 AMIR MOKAYEF as the trustee on or about May 20, 2009;

22 c. Union Central policy number A00013128F in the name of
23 "Mokayef Capital, Inc. 401k Profit Sharing Plan," which was opened by
24 defendant AMIR MOKAYEF as the President of Mokayef Capital, Inc., on
25 or about February 19, 2010;

26 d. AEI Accredited Investor Fund VI account number
27 0170540707 in the name of "Mokayef Capital Inc. 401K PSP," which was
28 opened by defendant AMIR MOKAYEF as the President of Mokayef Capital,

1 Inc., on or about March 8, 2010;

2 e. SEI Private Trust Company account number 415940 with
3 a plan name of "Mokayef Capital, Inc. 401K," which was opened by
4 defendant AMIR MOKAYEF as the President of Mokayef Capital, Inc., on
5 or about September 1, 2010;

6 f. Wells Fargo Bank account number 677385759 in the name
7 of Joseph Barrios, which was opened by defendant JOSEPH BARRIOS, aka
8 JB, on or about May 6, 1994;

9 g. Wells Fargo Bank account number 8633243194 in the name
10 of Joseph Barrios Irrevocable Trust, which was opened by defendant
11 JOSEPH BARRIOS, aka JB, as the trustee on or about January 4, 2008;

12 h. Wells Fargo Bank account number 6786700523 in the name
13 of Joseph Barrios, which was opened by defendant JOSEPH BARRIOS, aka
14 JB, on or about May 17, 2012;

15 i. an Audi R8, currently registered to Joseph Barrios,
16 bearing VIN WUAVNAFG5BN001171, which was purchased by defendant JOSEPH
17 BARRIOS, aka JB, in or about 2012; and

18 j. the real property located at 5848 Soledad Road,
19 La Jolla, California (which defendant AMIR MOKAYEF purchased on or
20 about October 20, 2006), legally described as: Assessor's Parcel
21 Number (APN) 358-192-10, Lot 42 of Soledad Corona Estates Unit No. 1
22 in the City of San Diego, County of San Diego, State of California,
23 according to map thereof no. 4008, filed in the Office of the County
24 Recorder of San Diego County on November 7, 1958.

25 **Substitute Property Forfeiture**

26 12. If any of the above-described forfeitable property, as a
27 result of any act and/or omission of said defendants -

28 a. cannot be located upon the exercise of due diligence;

1 NILESH KUMAR AMBUBHAI PATEL, aka Neil, BENJAMIN JOHN WILLIAM WEBER,
2 and MACHO SPORTS INTERNATIONAL CORP. shall forfeit to the United
3 States: (a) any and all property, real and/or personal, which
4 constitutes and/or is derived from proceeds traceable to a violation
5 of Title 18, United States Code, Section 1955; and (b) any and all
6 property, including money, used in violation of Title 18,
7 United States Code, Section 1955, including but not limited to:

8 a. Bank of America account number 01703-40000 in the name
9 of Mokayef Capital, Inc., which was opened by defendant AMIR MOKAYEF
10 as the President of Mokayef Capital, Inc., on or about February 28,
11 2005;

12 b. Wells Fargo Bank account number 73479200 in the name
13 of Amir Mokayef Separate Property Trust, which was opened by defendant
14 AMIR MOKAYEF as the trustee on or about May 20, 2009;

15 c. Union Central policy number A00013128F in the name of
16 "Mokayef Capital, Inc. 401k Profit Sharing Plan," which was opened by
17 defendant AMIR MOKAYEF as the President of Mokayef Capital, Inc., on
18 or about February 19, 2010;

19 d. AEI Accredited Investor Fund VI account number
20 0170540707 in the name of "Mokayef Capital Inc. 401K PSP," which was
21 opened by defendant AMIR MOKAYEF as the President of Mokayef Capital,
22 Inc., on or about March 8, 2010;

23 e. SEI Private Trust Company account number 415940 with
24 a plan name of "Mokayef Capital, Inc. 401K," which was opened by
25 defendant AMIR MOKAYEF as the President of Mokayef Capital, Inc., on
26 or about September 1, 2010;

27 f. Wells Fargo Bank account number 677385759 in the name
28 of Joseph Barrios, which was opened by defendant JOSEPH BARRIOS, aka

1 JB, on or about May 6, 1994;

2 g. Wells Fargo Bank account number 8633243194 in the name
3 of Joseph Barrios Irrevocable Trust, which was opened by defendant
4 JOSEPH BARRIOS, aka JB, as the trustee on or about January 4, 2008;

5 h. Wells Fargo Bank account number 6786700523 in the name
6 of Joseph Barrios, which was opened by defendant JOSEPH BARRIOS, aka
7 JB, on or about May 17, 2012;

8 i. an Audi R8, currently registered to Joseph Barrios,
9 bearing VIN WUAVNAFG5BN001171, which was purchased by defendant JOSEPH
10 BARRIOS, aka JB, in or about 2012; and

11 j. the real property located at 5848 Soledad Road,
12 La Jolla, California (which defendant AMIR MOKAYEF purchased on or
13 about October 20, 2006), legally described as: Assessor's Parcel
14 Number (APN) 358-192-10, Lot 42 of Soledad Corona Estates Unit No. 1
15 in the City of San Diego, County of San Diego, State of California,
16 according to map thereof no. 4008, filed in the Office of the County
17 Recorder of San Diego County on November 7, 1958.

18 **Substitute Property Forfeiture**

19 15. If any of the above-described forfeitable property, as a
20 result of any act and/or omission of said defendants -

21 a. cannot be located upon the exercise of due diligence;
22 b. has been transferred and/or sold to, and/or deposited
23 with, a third party;

24 c. has been placed beyond the jurisdiction of the Court;

25 d. has been substantially diminished in value; and/or

26 e. has been commingled with other property which cannot
27 be subdivided without difficulty;

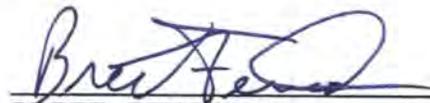
28 it is the intent of the United States, pursuant to Title 28, United

1 States Code, Section 2461(c), incorporating Title 21, United States
2 Code, Section 853(p), to seek forfeiture of any other property of said
3 defendants up to the value of the property listed above as being
4 subject to forfeiture.

5 All pursuant to Title 18, United States Code, Sections 981(a)(1)(C)
6 and 1955(d); and Title 28, United States Code, Section 2461(c).

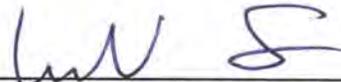
7 This Complaint is based on the attached 45-page Probable Cause
8 Statement, which is incorporated fully herein by reference.

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BRETT FENOGLIO
Special Agent
Federal Bureau of Investigation

SWORN to before me and SUBSCRIBED in my presence on June 6, 2013.



Hon. WILLIAM V. GALLO
U.S. Magistrate Judge

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF CALIFORNIA

3 UNITED STATES OF AMERICA,)
4 Plaintiff,)
5 v.)
6 JAN HARALD PORTOCARRERO (1),)
7 aka Leo, et al.,)
8 Defendants.)

PROBABLE CAUSE STATEMENT

9 I, BRETT FENOGLIO, declare under penalty of perjury that the
10 following is true and correct:

11 I

12 PROBABLE CAUSE OVERVIEW

13 A. Investigative Overview

14 1. Based on an extensive wiretap investigation, FBI agents
15 determined that MACHO SPORTS¹ is an illegal gambling business
16 headquartered in Lima, Peru, that accepts hundreds of thousands of
17 dollars in sports betting wagers from the Southern District of
18 California and elsewhere using its websites, its toll-free telephone
19 numbers, and its bookmakers ("bookies"). As discussed below, Jan and
20 Erik PORTOCARRERO are the leaders of MACHO SPORTS and operate it
21 primarily from Lima, Peru. Amir MOKAYEF and Joseph BARRIOS are
22 bookies who recruit betting clients for MACHO SPORTS in California.
23 All four men have previous law enforcement contacts or convictions for
24 illegal bookmaking. Under California law, bookmaking is illegal and

25 _____
26 ¹ "MACHO SPORTS" refers to the enterprise identified in the
27 Complaint, which is incorporated fully herein by reference. Part of
28 the MACHO SPORTS enterprise is the foreign corporation known as "Macho
Sports International, Corp.," which is also currently headquartered
in Lima, Peru.

1 punishable by up to 3 years in state prison.²

2 2. All dates, times, and quantities in this Probable Cause
3 Statement are exact figures or best approximations. All quoted
4 conversations are excerpts from consensually audio-recorded
5 conversations or court-authorized wiretapped calls, unless otherwise
6 indicated. I have included in parentheses or brackets my explanations
7 of ambiguous or coded speech.

8 **B. Bookmaking Contacts/Convictions: Jan & Erik PORTOCARRERO,
9 MOKAYEF, BARRIOS, and SULLIVAN (1997-2003)**

10 3. From 1997 to 2003, Erik and Jan PORTOCARRERO, Amir MOKAYEF,
11 Joseph BARRIOS, and sub-bookie Charles SULLIVAN all suffered
12 Los Angeles-area bookmaking arrests, convictions, warrants, and/or
13 other police contacts as detailed in the individual discussions of the
14 evidence against each defendant below. (See Section II, below.) The
15 bookmaking crimes appear to be connected based on the similar dates
16 and location. For example, on December 16, 2001, bookmaking-related
17 bench warrants issued for Erik PORTOCARRERO, MOKAYEF, BARRIOS, and
18 SULLIVAN, according to criminal record queries. The defendants have
19 referenced this shared bookmaking arrest history during calls.

20 **C. The Enterprise: MACHO SPORTS**

21 4. On May 2, 2002, Macho Sports International, Corp., was
22 registered in Panama, according to Panamanian public documents.

23 5. In 2008, the PORTOCARREROS moved their bookmaking
24 headquarters to Peru. Peruvian public documents show that on
25 November 13, 2008, Victor Jesus Ramon Portocarrero Giles (father of

26 ² CAL. PENAL CODE § 337a ("bookmaking" penalty is "imprisonment
27 in the county jail for a period of not more than one year or in the
28 state prison"); CAL. PENAL CODE § 18 (every offense "punishable by
imprisonment in a state prison, is punishable by imprisonment in any
of the state prisons for 16 months, or two or three years").

1 Erik and Jan PORTOCARRERO) and Manuel Portocarrero Giles were granted
2 power to operate Macho Sports International, Corp., in Peru. Ramon
3 and Manuel are straw owners, while MACHO SPORTS' true owners are Erik
4 and Jan PORTOCARRERO, based on wiretap calls, conversations with MACHO
5 SPORTS employees, and an interview with a DEA agent who is friendly
6 with the PORTOCARREROS.

7 6. MACHO SPORTS operates websites at www.machosports.com and
8 www.betmacho.com as well as at least two toll-free numbers – **Macho**
9 **Sports Main Number**³ and **Macho Sports Unpublished Number**⁴ – where
10 customers can place wagers on sporting events and track their betting
11 accounts. In addition, MACHO SPORTS has a network of bookmakers from
12 San Diego to Los Angeles, who recruit clients and pay and collect
13 betting wins and losses.

14 **D. Undercover Infiltration of MACHO SPORTS (Sept. 2011)**

15 7. On September 26, 2011, the FBI set up an operation to
16 introduce an undercover agent (UC-2) to MACHO SPORTS bookie Amir
17 MOKAYEF at a San Diego club where MOKAYEF was watching Monday Night
18 Football. While sitting at the bar near MOKAYEF, UC-2, who was
19 wearing an audio-recording device, pretended to talk on his cell phone
20 with his bookie and feigned frustration at not being able to get a
21 "line" on the second half of the game. MOKAYEF then approached UC-2
22 and said he could take UC-2's "action." UC-2 placed a \$1,500 bet with
23 MOKAYEF for the second half of the game, and MOKAYEF gave UC-2 a user

24 _____
25 ³ "Macho Sports Main Number" refers to toll-free telephone
26 number (866) 906-2246, which is the contact number for MACHO SPORTS,
according to www.machosports.com.

27 ⁴ "Macho Sports Unpublished Number" refers to telephone number
28 (888) 241-7999. On September 24, 2012, FBI Special Agent Brett
Fenoglio called **Macho Sports Unpublished Number** and heard a recorded
announcement, identifying the business as "MACHO SPORTS."

1 ID and password for use on www.machosports.com, a MACHO SPORTS
2 website. MOKAYEF also explained that his betting customers could
3 place bets by calling him or by utilizing the MACHO SPORTS website.

4 8. UC-2 ultimately lost the \$1,500 bet that night. Two days
5 later, his MACHO SPORTS online account page showed UC-2's "Current
6 Balance" as "\$ -1,500.00."

7 9. From September 2011 through early 2013, the FBI used UC-2's
8 MACHO SPORTS online account to place dozens of bets on NFL football
9 games. On November 26, 2012, MOKAYEF established an online MACHO
10 SPORTS betting account for another undercover agent (UC-3), who was
11 posing as UC-2's nephew. The FBI also used UC-3's account to place
12 several bets on NFL football games and Mixed Martial Arts (MMA)
13 matches.

14 **E. Wiretap on MOKAYEF and BARRIOS (Oct. 2012 - Feb. 2013)**

15 10. From October 2012 to February 2013, agents used three
16 separate wiretap orders to wiretap MOKAYEF's cell phone. From January
17 to February 2013, under the last wiretap order, they also wiretapped
18 MACHO SPORTS bookie Joseph BARRIOS's cell phone.

19 11. The wiretapped calls, and accompanying surveillance,
20 confirmed MACHO SPORTS' methods and means, as detailed in the
21 Complaint and as further detailed in the below discussion of
22 particular evidence against each individual defendant. In addition,
23 the wiretapped calls, and accompanying surveillance, confirmed the
24 following basic structure of the MACHO SPORTS enterprise:

25 **MACHO SPORTS Headquarters (Lima, Peru)**

26 12. Jan and Erik PORTOCARRERO own and operate MACHO SPORTS,
27 primarily from the enterprise's headquarters in Lima, Peru. The
28 PORTOCARREROS employ numerous telephone operators and several managers

1 at the headquarters. The managers, such as Young KOH, oversee MACHO
2 SPORTS' telephone and internet operations, resolve disputes, and
3 adjust customers' lines of credit and online accounts.

4 Bookies and Sub-Bookies (San Diego and Los Angeles)

5 13. MACHO SPORTS has various bookies in Southern California,
6 including MOKAYEF in San Diego and BARRIOS in Los Angeles. The
7 bookies are responsible for recruiting customers, paying off wagering
8 wins, and collecting wagering losses. While MOKAYEF and BARRIOS
9 recruit customers directly, they also manage their own networks of
10 sub-bookies, who recruit and deal with customers for them. Each
11 sub-bookie is responsible for his or her own "package," which refers
12 to all the accounts of customers managed by that sub-bookie.

13 Runners and Collectors for MACHO SPORTS

14 14. Finally, MACHO SPORTS employs runners and collectors who
15 deal directly with customers on behalf of various MACHO SPORTS
16 bookies. The runners, such as Randall IRWIN and Larry GOLD, handle
17 customer payments and collections. For example, IRWIN has collected
18 gambling losses from customers for both MOKAYEF and BARRIOS. The
19 collectors specialize in more aggressive measures to obtain payment
20 on gambling debts. For example, one collector (R.M.) has been
21 implicated in various acts of threats or violence in connection with
22 MACHO SPORTS collections. R.M. is currently awaiting trial in Orange
23 County Superior Court regarding a violent home invasion.

24 II

25 PROBABLE CAUSE AGAINST EACH DEFENDANT

26 15. Below I set forth additional facts against each individual
27 defendant that establish probable cause to believe they have committed
28 the charged crime(s).

1 1 Jan Harald PORTOCARRERO, aka Leo
2 Role: Leader
3 DOB: xx/xx/1973
4 SSN: xxx-xx-3795
5
6 Arrest: Bookmaking (1997)
7



8 **A. WIRETAP EXAMPLES**

9 16. "Sharp Betting" (TT#1 / #793 / 11/9/2012 @16:21): On
10 November 9, 2012, MOKAYEF called Jan PORTOCARRERO at Macho Sports
11 Unpublished Number and asked him to take a close look at the betting
12 history of customer "5153" (D.G.) to determine whether he might be a
13 professional gambler, "because he's been killing us. . . . For the
14 past three weeks, 5153 [customer D.G.] has been up 160 [\$160,000 in
15 winnings] and now is up another 20 [an additional \$20,000 in
16 winnings]." Jan PORTOCARRERO explained how to determine if a customer
17 is "sharp betting against you" (wagering like a professional gambler).
18 After analyzing one of customer 5153's parlay bets, Jan PORTOCARRERO
19 quickly concluded that the customer was "betting sucker stuff. . . .
20 [J]ust by seeing that, I wouldn't even have to look into this account
21 any more than that. He's a square; he got lucky." Jan PORTOCARRERO
22 explained that last week "no bookmakers won," that "all the favorites
23 won their games," so "stop crying."

24 17. "You're Untouchable" (TT#2 / #3100 / 2/14/2013 @16:48): On
25 February 14, 2012, Jan PORTOCARRERO called BARRIOS to reassure him
26 that he would not face any actual jail time from bookmaking, if the
27 police found out about it. BARRIOS explained that sub-bookie Todd
28 HEFLIN had tried to "threaten[]" a delinquent betting customer,

1 prompting the customer's ex-wife to say she would call the police.
2 This frightened HEFLIN, who told BARRIOS, "if I go down, you're going
3 down with me," according to BARRIOS.

4 18. BARRIOS worried that if "I get arrested," then "I have to
5 go through the IRS again and pay another fucking whatever \$100,000."
6 Jan PORTOCARRERO said, "It's not that easy [to be charged with a
7 crime]. You can't just point a finger and that's it, bro. You know
8 how many people point the finger at me?" BARRIOS replied, "Yeah, but
9 you're 8,000 miles away [in Peru]. You're untouchable." Jan
10 PORTOCARRERO said, "I still fly into the United States all the time.
11 If they wanna arrest me, they arrest me when I come in. I mean, trust
12 me, the government is more after me than they are after you."

13 19. Later, Jan PORTOCARRERO assured BARRIOS he did not need to
14 fear arrest, saying, "Everyone knows you're a bookmaker. You flaunt
15 it. . . . What they [law enforcement] want is the money. They don't
16 want to take [arrest] JB; they wanna grab . . . the washing machine
17 with half a million to a million [dollars stashed in it]. . . . They
18 want the \$2 million. That's what they want." BARRIOS replied, "Well,
19 you're holding all my money, so I'm not really worried about that."

20 20. Regarding the money from the delinquent customer, Jan
21 PORTOCARRERO told BARRIOS, "[Sub-bookie] Todd [HEFLIN] owes the money.
22 Todd is solely responsible for this."

23 **B. PRIOR ARREST/DETENTION/CITATION**

24 21. On May 28, 1997, Jan PORTOCARRERO was arrested, detained,
25 or cited for illegal bookmaking (CAL. PENAL CODE § 337a(1)), according
26 to a criminal history query.

27 **C. LEADERSHIP ROLE**

28 22. Numerous wiretapped calls establish that Jan PORTOCARRERO

1 was in a leadership position, with ultimate decisionmaking authority
2 at MACHO SPORTS. During the February 14, 2013 call described above,
3 BARRIOS greeted Jan PORTOCARRERO as "Boss, Supreme Court Justice,
4 President of Peru." Similarly, on February 16, 2013, Jan PORTOCARRERO
5 told BARRIOS, "You and Amir [MOKAYEF] are the only ones that I allow
6 to set up their own credit limits [for customers]."

7 **D. VIOLENCE/THREATS/PROPERTY CRIMES**

8 23. **R.M. "Kidnaps People" and Assaults:** On February 14, 2013,
9 BARRIOS and Jan PORTOCARRERO discussed MACHO SPORTS' use of violent
10 collectors. BARRIOS was worried about law enforcement repercussions,
11 because a collector had "banged on the fucking door and threatened [a
12 delinquent customer]." Jan PORTOCARRERO reassured him, saying, "Look
13 at [collector R.M.]. He fucking kidnaps people, strikes them with a
14 gun, and he's walking the streets."

15 24. **Auto Theft:** On February 9, 2013, Jan PORTOCARRERO discussed
16 how he stole cars from delinquent customers, saying, "I've got the
17 Audi. I got the Porsche Cayenne that I took from [a customer], and
18 then I got the Escalade." BARRIOS said, "We graduated from taking
19 people's cars [to] their watch collections. Why don't you sell all
20 that shit? You're holding on to that till he pays you back?" Jan
21 PORTOCARRERO replied, "Yeah, collateral."

22 25. **Fear of Death:** On February 12, 2013, BARRIOS told Jan
23 PORTOCARRERO how sub-bookie "Todd [HEFLIN] went and put the fear of
24 death into this bartender [M.A.], and the bartender also [said], 'If
25 anyone comes in the bar, or anyone fuckin' threatens me of any kind,
26 I will go to the police.'"

27 //

28 //

<p>1 2 Erik PORTOCARRERO, aka Bo 2 AKA: The Clam Eater 3 Role: Leader 4 DOB: xx/xx/1970 5 SSN: xxx-xx-4582</p> <p>6 Record: 2003: Bribery re: Gaming-SA043913 7 1997: (m) Bookmaking-SA028446-01 8 1992: Forge Name/Card-BA051569</p>	
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8 **A. WIRETAP EXAMPLES**

9 26. **"Monthly Check Figures" / \$1.2 million**: On January 23, 2013,
10 BARRIOS called Erik PORTOCARRERO at **Macho Sports Main Number** and said,
11 "Mr. Bo, it's time for our monthly check figures." As they started
12 to review their bookmaking profits, Erik PORTOCARRERO said, "So that
13 was mid-December where you were at 1242044 [\$1,242,044]." Erik
14 PORTOCARRERO said the new figure was "1146481" (\$1,146,481), and
15 BARRIOS confirmed that number.

16 27. **AFC Championship Game**: Also during that January 23, 2013
17 wiretapped call, while discussing the weekend, BARRIOS said, "[W]e
18 were drinking . . . I don't even remember the New England game." (On
19 Sunday, January 20, 2013, the Baltimore Ravens upset the New England
20 Patriots, 28-13, in the AFC Championship Game.) Erik PORTOCARRERO
21 replied, "[I]t was a great game . . . for the office [because
22 customers bet heavily on the favored Patriots]."

23 28. **R.M., Gambling Debt Collector**: During that same call, Erik
24 PORTOCARRERO asked BARRIOS, "What about the 50 [\$50,000] from
25 [collector R.M.]?" BARRIOS said that R.M. was claiming that "your
26 brother [Jan PORTOCARRERO] and I gave that money to him. . . . for
27 years of service [as a gambling debt collector]." Erik PORTOCARRERO
28 interrupted, saying, "Years of service? . . . [T]here's not one deal

1 I can say that the guy did something good for me, man. . . . cuttin'
2 side deals." BARRIOS replied, "I was like, '[R.M.], how many times
3 have you collected money for me and kept it and told me you didn't get
4 the money?' You haven't brought me one penny in over
5 10 years."

6 29. "Ralph with 500 Players Got Busted" (TT#2 / #2174 / 2/7/2013
7 @15:25): On February 7, 2013, BARRIOS called Erik PORTOCARRERO at
8 **Macho Sports Main Number** and said that yesterday "Amir" (Amir MOKAYEF)
9 called him "about runners getting busted, one in Las Vegas and one in
10 Los Angeles. And to be careful." BARRIOS said he heard "a guy named
11 Ralph with 500 players [betting customers] got busted." Erik
12 PORTOCARRERO replied that MACHO SPORTS does not have "a Ralph that got
13 busted." BARRIOS asked if "that Ralph" who works for MACHO SPORTS
14 "had 500 players." Erik PORTOCARRERO said, "No."

15 30. BARRIOS: "Wrong Bald Guy" (TT#1 / #177 / 11/1/2012 @14:45):
16 On November 1, 2012, BARRIOS offered "to call Bo [Erik PORTOCARRERO]"
17 for MOKAYEF, to settle the dispute about the balance on MOKAYEF's
18 personal betting account. They argued, and BARRIOS finally said,
19 "[Y]ou're yelling at the wrong bald guy. . . . The guy in Peru [Erik
20 PORTOCARRERO, who is bald] refreshes the account, not me." Finally,
21 MOKAYEF said he would talk to "the other bald guy" about it later.

22 **B. PRIOR BOOKMAKING-RELATED CONVICTIONS**

23 31. According to a criminal history query:

24 a. On May 19, 1997, Erik PORTOCARRERO was convicted of
25 illegal bookmaking (CAL. PENAL CODE § 337a(1)).

26 b. On December 16, 2001, bench warrants issued for Erik
27 PORTOCARRERO, Amir MOKAYEF, and Joseph BARRIOS for criminal bookmaking
28 activities. The bench warrants charged Erik PORTOCARRERO and MOKAYEF

1 with bribery in relation to illegal gaming (CAL. PENAL CODE § 337) and
2 Joseph BARRIOS with illegal bookmaking (CAL. PENAL CODE § 337a(1)).

3 c. On January 8, 2003, Erik PORTOCARRERO was convicted in
4 the case involving bribery in relation to illegal gaming.

5 **C. LEADERSHIP ROLE**

6 32. Undercover conversations, interviews, and wiretapped calls
7 indicate Erik PORTOCARRERO had ultimate decisionmaking authority at
8 MACHO SPORTS, along with his brother Jan PORTOCARRERO.

9 33. For example, on November 1, 2012, during a dispute about
10 MOKAYEF's personal betting account balance, BARRIOS told MOKAYEF that
11 he "went over figures yesterday with Bo [Erik PORTOCARRERO]." After
12 BARRIOS listed MOKAYEF's gambling wins and losses, MOKAYEF asked if
13 "Bo took that out of my account?" BARRIOS said, "Yes." MOKAYEF said,
14 "You guys are so fucked in the head with your figures." BARRIOS
15 retorted, "Why don't you call and tell him [Erik PORTOCARRERO] that?
16 . . . Bo is always flying around the world, so they do figures every
17 couple weeks."

18 34. Similarly, on February 11, 2012, BARRIOS stated, "Leo [Jan
19 PORTOCARRERO] and Bo [Erik PORTOCARRERO] started MACHO SPORTS."

20 **D. VIOLENCE/THREATS**

21 35. In the January 23, 2013 call mentioned above, Erik
22 PORTOCARRERO and BARRIOS discussed their problems with R.M., who is
23 one of MACHO SPORTS' violent/intimidating gambling debt collectors.

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1	3	Amir MOKAYEF Role: Bookie DOB: xx/xx/1976 SSN: xxx-xx-4275 Record: 2003: 1- Bookmaking (3 days/Dism) 2- Keep Bookmaking Premises 1997: (m) Battery/SBI (Prob.)	
2	3		
3	4		
4	5		
5	6		
6	7		

8 **A. WIRETAP EXAMPLES**

9 36. *If I Have to "Bring the Dogs Out, They're Going to Get 25%"*
10 (TT#1 / #530 / 11/6/2012 @10:23): On November 6, 2012, MOKAYEF told
11 UF530 that he might have to call out his "dogs," or enforcers, to
12 collect payment from "Rick," a delinquent customer. MOKAYEF said that
13 UF530 "may want to call her boy Rick because [UF530] might be out a
14 lot of money" if MOKAYEF has to "go after the guy." MOKAYEF said that
15 if he did not "get it [Rick's payment for the gambling debt]
16 Thursday," then he would have to "put the dogs out [call in his
17 enforcers]" and "get ready to rock and roll here for next week." In
18 that case, MOKAYEF told UF530 that it "comes out of [UF530's] pocket,
19 and that money won't be . . . you won't be getting it." UF530 replied
20 that "whatever money we get from him [Rick] is to pay off that balance
21 [Rick's gambling debt] and the rest is for [UF530]." MOKAYEF
22 responded that if he had to "bring the dogs out [call in his
23 enforcers], they're going to get 25%, understand? . . . I'm gonna
24 get my 9000 [\$9,000]."

25 37. *"Just Show Up and Take [His] F-king Loot"* (TT#1 / #953 /
26 11/12/12 @15:14): On November 12, 2012, Jason LNU called MOKAYEF to
27 discuss forcibly taking money from "Kelly," a delinquent gambling
28 customer. Jason LNU said that "if there is ever a time where I'm

1 sitting face to face with [Kelly]" at a poker game that MOKAYEF will
2 be "the first guy that I call." MOKAYEF replied that he needed
3 "something where I know [Kelly] will be there," and then he would need
4 "a couple of days so I can get these guys [the enforcers] rounded up
5 and then come on over there and pop on in." Jason LNU disagreed,
6 saying, "Fuck that and just show up. . . . If [Kelly] is playing in
7 a poker game then he has money on him," so MOKAYEF should "just show
8 up and take his fucking loot."

9 38. Bookmaking for "16 or 17 Years Now" (TT#1 / #2006 /
10 12/5/2012 @09:50): On December 5, 2012, MOKAYEF said, "I've been doing
11 business with them [the MACHO SPORTS website owners] for 16 or 17
12 years now. . . . All these other ones [gambling websites] are, uh,
13 they're con artists. They don't pay if you win."

14 39. "I wipe my ass with \$43,000" (TT#1 / #2429 / 12/12/2012
15 @20:31): On December 12, 2012, MOKAYEF called sub-bookie Benjamin
16 WEBER to complain about WEBER's failure to get a customer to pay his
17 gambling debt of about \$43,000. WEBER said, "We will make it happen.
18 I need the money myself." MOKAYEF retorted, "I understand that you
19 need the money. I don't need the money. I wipe my ass with \$43,000.
20 It is the fucking principle of the whole goddamn thing."

21 **B. RECORDED CONVERSATIONS WITH UNDERCOVER AGENTS**

22 40. MOKAYEF to UC-1: Bookmaking "Not Really" Legal: On
23 August 31, 2011, during a consensually recorded call with an
24 undercover agent (UC-1), MOKAYEF said, "I just want to make sure
25 you're not a cop. . . . you understand?" UC-1 asked, "What's the big
26 deal? It's just, it's legal, right . . .?" MOKAYEF replied, "Yeah,
27 but, yeah, not really it's not."

28 //

1 C. ADMISSIONS TO CIVILIAN WITNESSES

2 41. MOKAYEF's Admissions During Home Loan Refinance: According
3 to the loan officer who helped MOKAYEF refinance his La Jolla home,
4 MOKAYEF said that he was the "owner/operator of an internet gambling
5 service" during the refinancing process.

6 D. PRIOR BOOKMAKING-RELATED CONVICTIONS AND POLICE CONTACTS

7 42. According to a criminal history query:

8 a. On December 16, 2001, bench warrants issued for Amir
9 MOKAYEF, Erik PORTOCARRERO, and Joseph BARRIOS for criminal bookmaking
10 activities. The bench warrants charged MOKAYEF and Erik PORTOCARRERO
11 with bribery in relation to illegal gaming (CAL. PENAL CODE § 337) and
12 Joseph BARRIOS with illegal bookmaking (CAL. PENAL CODE § 337a(1)).

13 b. On November 17, 2003, MOKAYEF was convicted of illegal
14 bookmaking (CAL. PENAL CODE § 337a(1)) and of keeping a bookmaking
15 premises (CAL. PENAL CODE § 337a(2)). On September 7, 2007, these
16 convictions were reduced to misdemeanors and dismissed under CAL. PENAL
17 CODE § 1203.4.

18 E. MANAGEMENT ROLE

19 43. On September 26, 2011, MOKAYEF admitted to UC-2 that he has
20 runners in San Diego and Los Angeles. Since the wiretap
21 investigation, FBI agents have fully identified about nine sub-bookies
22 and three runners for MOKAYEF. In addition, MOKAYEF's home loan
23 refinance application, dated February 16, 2010, lists his occupation
24 as "President" of "Mokayef Capital, Inc.," which is in the business
25 of "sports gaming."

26 F. VIOLENCE/THREATS

27 44. See discussion above of the 2012 calls from November 6
28 ("bring the dogs out") and November 12 ("take [his] fucking loot").

1	4	Joseph BARRIOS, aka JB Role: Bookie DOB: xx/xx/1966 SSN: xxx-xx-6773	
2			
3			
4		Record: 2006: DUI (Prob.)	
5		2001: Unspec. Chg. (PC 1203.4)	
6		1993: Fraudulent Phone Use (2yr)	
7		Warrant: Bookmaking (2001)	

8 **A. WIRETAP EXAMPLES**

9 45. Bookmaking "For 24 Years" / Reputation of MACHO SPORTS /
10 "Fear of God in this Motherf-r" (TT#2 / #461-62 / 1/26/2013 @22:15 &
11 22:22): On January 26, 2013, at 22:15, BARRIOS told sub-bookie Isaac
12 GHARIBEH that he could not allow a customer to fail to pay his
13 gambling debts, saying, "The [\$]143,000 cannot walk away and ruin the
14 reputation of MACHO SPORTS." At 22:22, BARRIOS told GHARIBEH, "I've
15 been doing this [bookmaking] for 24 years" and that BARRIOS and
16 GHARIBEH should "put the fear of God in this motherfucker [the
17 delinquent customer]."

18 46. "Everyone Knows You're a Bookmaker" (TT#2 / #3100 /
19 2/14/2013 @16:48): On February 14, 2013, BARRIOS told Jan PORTOCARRERO
20 that he was worried that if "I get arrested," then "I have to go
21 through the IRS again and pay another fucking whatever \$100,000." Jan
22 PORTOCARRERO said, "It's not that easy [to be charged with a crime].
23 You can't just point a finger and that's it, bro. You know how many
24 people point the finger at me?" BARRIOS replied, "Yeah, but you're
25 8,000 miles away [in Peru]. You're untouchable." Jan PORTOCARRERO
26 said, "I still fly into the United States all the time. If they wanna
27 arrest me, they arrest me when I come in. I mean, trust me, the
28 government is more after me than they are after you."

1 47. Later, Jan PORTOCARRERO assured BARRIOS he did not need to
2 fear arrest, saying, "Everyone knows you're a bookmaker. You flaunt
3 it. . . . What they [law enforcement] want is the money. They don't
4 want to take [arrest] JB; they wanna grab . . . the washing machine
5 with half a million to a million [dollars stashed in it]. . . . They
6 want the \$2 million. That's what they want."

7 **B. PRIOR BOOKMAKING BENCH WARRANT**

8 48. According to a criminal history query, on December 16, 2001,
9 bench warrants issued for Joseph BARRIOS, Erik PORTOCARRERO, and Amir
10 MOKAYEF for criminal bookmaking activities. The bench warrants
11 charged BARRIOS with illegal bookmaking (CAL. PENAL CODE § 337a(1)) and
12 MOKAYEF and Erik PORTOCARRERO with bribery in relation to illegal
13 gaming (CAL. PENAL CODE § 337).

14 **C. MANAGEMENT ROLE**

15 49. BARRIOS has six fully identified sub-bookies and two fully
16 identified runners, as further discussed below. (For example, on
17 February 5, 2013, sub-bookie June NGUYEN greeted BARRIOS, saying, "Hi,
18 Boss-man.") Wiretap calls confirm that BARRIOS also used R.M. as an
19 enforcer/collector.

20 **D. VIOLENCE/THREATS**

21 50. **"Fear of God in This Motherf-r"**: See above discussion of
22 January 26, 2013 call.

23 51. **R.M. "Kidnaps People" and Assaults**: On February 14, 2013,
24 BARRIOS and Jan PORTOCARRERO discussed MACHO SPORTS' use of violent
25 collectors. BARRIOS was worried about law enforcement repercussions,
26 because a collector had "banged on the fucking door and threatened [a
27 delinquent customer]." Jan PORTOCARRERO reassured him, saying, "Look
28 at [collector R.M.]. He fucking kidnaps people, strikes them with a

1 gun, and he's walking the streets."

2 52. R.M. "Threatened to Kill Some Bitch" / "That's
3 Racketeering, Extortion" (TT#2 / #3085 / 2/14/2013 @15:16): See
4 full summary below under SULLIVAN(8).

5 **E. OBSTRUCTING JUSTICE**

6 53. See discussion of HEFLIN (13) below, regarding BARRIOS's
7 strategies for lying to law enforcement and obstructing justice.

9 10 11 12 13 14 15	5 Young Hee KOH, aka Ace, aka Sonny Role: MACHO SPORTS Manager in Peru DOB: xx/xx/1976 SSN: xxx-xx-1536	
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16 **A. WIRETAP EXAMPLES**

17 54. "Should We Try to Whack Him?" (TT#1 / #3028 / 12/23/2012
18 @15:43): On December 23, 2012, MOKAYEF called Macho Sports Unpublished
19 Number and spoke to "Ace" (Young KOH) to complain that customer "5114
20 is really pissing me off. . . . This whole year he's up [winning],
21 like big." KOH replied that 5114 was "up 27 dimes [\$27,000] this
22 year. . . . C'mon, man, you wipe your ass with that kind of money."
23 MOKAYEF says, "I've got an account that I want to use with this
24 fuckin' guy. Should we try to whack him?" KOH said, "Sure." ("Whack
25 him" means giving the customer an account that they do not intend to
26 pay any winnings on. If the customer loses money on the account,
27 MACHO SPORTS will collect from him. If the customer wins, however,
28 they will refuse to pay.) MOKAYEF asked, "Do we have to talk to Leo

1 [Jan PORTOCARRERO] about it? . . . Yeah, we have to get Leo
2 involved." KOH replied, "Yeah."

3 55. \$50,000 Credit To Avoid a Customer "Call[ing] the Police"
4 (TT#2 / #2928 / 2/13/2013 @13:54): On February 13, 2012, BARRIOS
5 called **Macho Sports Main Number** and spoke to "Ace" (KOH) about how
6 sub-bookie Todd HEFLIN had failed to pay a customer (B.B.) his \$50,000
7 in winnings. BARRIOS said that "it's like bad exposure. 'Oh, MACHO
8 doesn't pay.' And we all know how Leo [Jan PORTOCARRERO] doesn't like
9 bad news getting around town." KOH looked up B.B.'s betting accounts
10 and said that since 2006 B.B. was "up 185 [\$185,000]" on the 5398
11 account and on both accounts together "up 21K [\$21,000]." BARRIOS
12 said, "It's Leo's company," but he thinks they should give B.B. a
13 \$50,000 credit on his account, so "no one's threatening each other to
14 call the police."

15 B. MANAGEMENT ROLE

16 56. The wiretap calls confirm that KOH was one of the managers
17 working at the MACHO SPORTS headquarters in Peru and exercised
18 decisionmaking authority over betting accounts. For example, on
19 February 17, 2013, BARRIOS called **Macho Sports Main Number** and said,
20 "Supervisor, please." After a brief hold, KOH answered the phone.
21 BARRIOS asked for permission to "raise [a customer's] cap 200 bucks
22 [\$200] temporarily." (The "cap" refers to the credit limit.)

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1	6	Randall Lee IRWIN, aka Tyler	
2		Role: Runner for MACHO SPORTS	
3		DOB: xx/xx/1961	
4		SSN: xxx-xx-8508	
5			
6			
7			

8 **A. UNDERCOVER MEETING (IRWIN COLLECTED UC-3's BETTING LOSSES)**

9 57. On February 1, 2013, at 11:00 a.m., IRWIN met with UC-3 to
10 collect \$5,000 in gambling losses. During a two-minute-long video-
11 and audio-recorded meeting, UC-3 paid IRWIN only \$200, saying, "I have
12 a little bit [\$200], next to nothing, but I didn't want to back out."
13 IRWIN replied, "I'm sure Amir [MOKAYEF] will appreciate that."
14 Immediately after the meeting, at 11:02 a.m., IRWIN left a voicemail
15 for MOKAYEF, saying, "Hey, Amir. It's Tyler calling. It's Friday.
16 Give me a call when you get a chance about [UC-3]. Okay. I met him.
17 He ripped it - 200 dollars." (Surveillance agents followed IRWIN from
18 the meeting place back to his home over the next two and a half hours,
19 ending at 1:55 p.m.) At 2:55 p.m., MOKAYEF called IRWIN back, and
20 IRWIN explained the meeting with UC-3 in more detail.

21 **B. WIRETAP EXAMPLES**

22 58. J & J Ventures (TT#1 / #1166 / 11/15/2012 @11:13): On
23 November 15, 2012, IRWIN informed MOKAYEF that it was time to change
24 the business name they were using to launder customer payments,
25 explaining that the "check cashing guy" wants to "change the name up
26 again. . . . The new name is going to be J & J Ventures." IRWIN told
27 MOKAYEF that the check cashing guy will still pay any cash MOKAYEF
28 "still has floating out now" (under the old name of Cash Cow, Inc.),

1 but it's "time to change it up."

2 59. Collecting \$7,500 from Alex (TT#1 / 12/20/2012): On
3 December 20, 2012, at 14:00, MOKAYEF called **Macho Sports Unpublished**
4 **Number** to find out the "ending balance" for Alex. The MACHO SPORTS
5 operator replied, "7500 minus [customer Alex had \$7,500 in gambling
6 losses]." One minute later, at 14:01, MOKAYEF called IRWIN to ask him
7 to "meet up with a guy either today or tomorrow . . . his name is
8 Alex." MOKAYEF provided Alex's phone number and said, "You are going
9 to be picking up 7500 [\$7,500] from him."

10 60. Picked up \$6,700 from Alex (TT#1 / #2894 / 12/21/2012
11 @13:19): On December 21, 2012, IRWIN said he "picked up 6700 [\$6,700]
12 from Alex" and the rest is a "kickback." MOKAYEF replied, "7500 minus
13 750, [is] 6700?" IRWIN said, "Alex said that the rest is a 10%
14 kickback." (\$750 is 10% of \$7,500.) MOKAYEF said, "I'll deal with
15 him later."

16 C. VIOLENCE/THREATS

17 61. During the February 1, 2013 videotaped meeting between IRWIN
18 and UC-3, UC-3 alluded to MACHO SPORTS' violent reputation with regard
19 to delinquent customers, saying, "But I didn't want to back out. . . .
20 Cat [runner Larry GOLD] told me, hey, you know, at the end of the day,
21 you know, just, guys who ditch phone calls are the ones who find
22 themselves in trouble. I don't want to be that dude."

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7 **Larry Neil GOLD, aka Cat**
Role: Runner for MACHO SPORTS
DOB: x/xx/1960
SSN: xxx-xx-2671



A. UNDERCOVER MEETING (GOLD COLLECTED UC-3's BETTING LOSSES)

62. On December 26, 2012, MOKAYEF left a voicemail message for UC-3, saying that UC-3 owed \$3,091 and that a runner named "Cat" would call UC-3 to arrange a meeting for payment. Seven minutes later, "Cat" (Larry GOLD) left the first of two voicemail messages on UC-3's telephone to arrange a meeting. During consensually recorded calls over the next two days, UC-3 and GOLD arranged to meet at a Del Taco restaurant in Burbank, California.

63. On December 28, 2012, UC-3 met GOLD at that Del Taco restaurant and paid him \$1,500. They spoke for about 30 minutes, during which GOLD explained how he had once been a betting customer, but that now he was a "runner" for MACHO SPORTS. GOLD said that he takes the "low key" approach to collecting money, "but it seems to get them [the betting customers] the message that a guy came out, and you may as well deal with the puppy [a 'low key' collector like GOLD] before the Dobermans [more violent collectors]." GOLD said he eventually "hit a point where I was holding [\$]200,000 [in gambling collections]" at any given time, but that now he only works part-time for MACHO SPORTS.

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1 **B. WIRETAP EXAMPLES**

2 64. UC-3 "Gave Me \$1,500" (TT#1 / #3286 / 12/28/2012 @12:22):

3 On December 28, 2012, a couple hours after the meeting with UC-3, GOLD
4 left a voicemail for MOKAYEF, saying, "It's Cat. I met up with
5 [UC-3]. He gave me \$1,500, which is about half [of UC-3's \$3,091 in
6 gambling losses]."

7 65. Collecting Debts from Martín and Rick (TT#1 / #3684 /

8 1/3/2013 @08:57): On January 3, 2013, GOLD talked to MOKAYEF about
9 collections from Martín and Rick, saying he might get Rick "to do a
10 bank deposit," because it's "such a small amount." GOLD said that
11 Martín was the one "I'm really worried about, because that's a bigger
12 amount." MOKAYEF said, "Martín is fine. He's been a long-time
13 client."

14 **C. VIOLENCE/THREATS**

15 66. GOLD's admission to UC-3 ("you may as well deal with the
16 puppy before the Dobermans") proves he is aware that MACHO SPORTS uses
17 violent collectors, although he is one of the "low key" collectors.

18 19 20 21 22 23 24	<p>8 Charles Edward SULLIVAN Role: Sub-Bookie for BARRIOS DOB: xx/xx/1972 SSN: xxx-xx-9294 Record: 2011: (m)Drive w/o License 2010: (m)DUI (13d + 3y Prob)</p> <p>Warrants: Bookmaking (2004); Keep Bookmaking Premises (2003); Bribery re: Gaming; FTA (2001)</p>	
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25
26 **A. WIRETAP EXAMPLES**

27 67. SULLIVAN's "Package" Is "Up To [\$]10,866" (TT#2 / #618 /

28 1/28/2013 @12:34): On January 28, 2013, BARRIOS left a voicemail for

1 "Charles," listing numerous 4-digit account numbers with the amount
2 of each account's winnings or losses (e.g., "4712 is plus [\$]2229,
3 4713 is minus [\$]330. . ."), concluding with "altogether that adds up
4 to minus [\$]5692 for the week, and your commission is [\$]517. And we
5 rolled over, unfortunately, [\$]5691, so, Charlie, now we are up to
6 [\$]10,866." BARRIOS said "this fucking package [SULLIVAN's package]"
7 was costing him money (because the gambling debts had not been
8 collected). He asked SULLIVAN to "get your shit together, please
9 [start collecting gambling debts from your customers], and make a nice
10 huge dent in this [\$]10,000."

11 68. "Is That My Player?" / Taking Players from Bo's Agent (TT#2
12 / #2663 / 2/11/2013 @15:33): On February 11, 2013, SULLIVAN and
13 BARRIOS discussed the customers in SULLIVAN's package. SULLIVAN asked
14 about customer "4709 Mike," saying he told that customer to "call your
15 agent [bookie or sub-bookie]," and he asked BARRIOS, "Is that my
16 player?" BARRIOS replied, "4709 belongs to another." BARRIOS then
17 asked, "You don't have a guy named Justin, do you? 4705 Justin?"
18 SULLIVAN replied, "Yeah. I got a 4705 Justin." BARRIOS said, "He
19 lost [\$]222 this week," and later added, "Now this guy is part of your
20 package, minus [\$]222." During the call, SULLIVAN mentioned that he
21 was "taking those players from that guy in Westlake, one of Bo's [Erik
22 PORTOCARRERO's] players, one of Bo's agents," because "apparently,
23 they don't like the guy."

24 69. Bookmaking "For 18 Years" (TT#2 / #3146 / 2/14/2013 @21:50):
25 On February 14, 2013, SULLIVAN told BARRIOS, "We've been doing
26 business [bookmaking] for 18 years and the most I've ever owed you is
27 \$50,000."

28 70. "Team Parlay at Halftime" (TT#2 / #3403 / 2/16/2013 @18:18):

1 On February 16, 2013, SULLIVAN told BARRIOS that he "motherfucked"
2 customer "4788," who was complaining that "the office [MACHO SPORTS]
3 wouldn't let him "make a team parlay at halftime."

4 **B. PRIOR BOOKMAKING WARRANT**

5 71. According to a criminal history query, on December 16, 2001,
6 bench warrants issued for Erik PORTOCARRERO, MOKAYEF, BARRIOS, and
7 SULLIVAN for bookmaking activities. On February 14, 2013, BARRIOS and
8 SULLIVAN discussed this shared bookmaking law enforcement contact.
9 During the call, BARRIOS asked, "When we got arrested [for bookmaking
10 in 2001], who got the tax bills from the IRS? Me?" SULLIVAN replied,
11 "JB did." BARRIOS said that that cost him "another \$60,000" and that
12 the "only people who got bills were me and Bo [Erik PORTOCARRERO]."

13 **C. VIOLENCE/THREATS**

14 72. R.M. "Threatened to Kill Some Bitch" / "That's Racketeering,
15 Extortion" (TT#2 / #3085 / 2/14/2013 @15:16): On February 14, 2013,
16 SULLIVAN called BARRIOS to try to obtain a violent collector for one
17 of his delinquent customers who owed \$9,000. SULLIVAN asked, "Who do
18 we have collecting?" BARRIOS replied, "Nobody. [R.M.] is in jail."
19 SULLIVAN said, "I thought we bailed him out?" BARRIOS replied, "Nah,
20 dude, he's in there for multiple, multiple felonies. . . . [J]ust
21 about a month ago, he threatened to kill some bitch in
22 Inglewood. . . . And then the Orange County Sheriff's Department came
23 in with his two year-old home invasion case. . . ." SULLIVAN said
24 disgustedly, "Jesus Christ!" BARRIOS said, "Collectors ain't worth
25 it, Charlie, because they get busted and they want you to pay their
26 attorney's fees. . . ." SULLIVAN said he couldn't do it, because "I
27 know the person personally." BARRIOS said, "I'm sure there are a
28 bunch of hicks out there where you are that will fuckin' do it," but

1 if they get caught "that's racketeering, extortion." BARRIOS said,
2 "Think about it, how much it's worth, too, you know. If it's fuckin'
3 5 grand [\$5,000] I wouldn't even blink. If it was 50 grand [\$50,000],
4 I'd think about it." SULLIVAN said, "It's about 9 grand [\$9,000]."

9	Michael Christopher IACO Role: Sub-Bookie for MOKAYEF DOB: xx/xx/1982 SSN: xxx-xx-2641	
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12 **A. WIRETAP EXAMPLES**

13 73. **"He's a Bookie"** (TT#1 / #167 / 11/1/2012 @12:37): On
14 November 1, 2012, MOKAYEF told IACO that the GRAND DEL MAR⁵ was "on
15 my ass about being what I am, and they're like, 'We don't want it
16 [bookmaking] promoted.'" MOKAYEF said that one of the older GRAND DEL
17 MAR members had complained about MOKAYEF, telling the management that
18 "you guys have a member [MOKAYEF] that's promoting bookmaking. He's
19 a bookie." As a result, MOKAYEF asked IACO to handle any bets from
20 the four betting customers he had at the GRAND DEL MAR and any new
21 ones he gets in the future.

22 74. **"Go Over the Figures"** (TT#1 / #1035 / 11/13/2012 @21:14):
23 On November 13, 2012, IACO called MOKAYEF to "go over the figures" for
24 about 10 customers. MOKAYEF said the total for all customers was
25 "\$3065" and that IACO gets "your 25%, \$766," so IACO owed "the
26

27 ⁵ "GRAND DEL MAR" refers to the private country club, resort,
28 luxury hotel, and golf course known as The Grand Del Mar at 5300 Grand
Del Mar Ct., San Diego, California 92130.

1 office [\$]2299." IACO asked if the customers should make the checks
2 out to "Cash Cow" or "Mokayef." MOKAYEF replied, "Cash Cow."

3 **B. TRASH COVER (PAY-AND-OWE SHEET)**

4 75. On January 7, 2013, agents confirmed that IACO lives at
5 IACO'S HOME,⁶ as they saw him placing the recycle trash bin outside
6 the house and then walking inside IACO'S HOME. On January 14, 2013,
7 agents pulled what they believed to be a pay-and-owe sheet from the
8 trash outside IACO'S HOME. This pay-and-owe sheet listed a series of
9 numbers that appeared to be gambling winnings or losses, next to
10 either a name or a 4-digit number (the MACHO SPORTS account number).
11 One name (Jake) and two numbers corresponded to a previously mentioned
12 customer name and previously mentioned customer winnings or losses in
13 wiretapped calls.

14 15 16 17 18 19 20	10 Emed G. SIDAROS, aka Ed Role: Sub-Bookie for BARRIOS DOB: xx/xx/1970 SSN: xxx-xx-6592	
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21 **A. WIRETAP EXAMPLES**

22 76. Ed Takes Customer's Porsche Panamera (TT#2 / #237 /
23 1/24/2013 @11:56): On January 24, 2013, SIDAROS said, "I am driving
24 a Panamera [Porsche Panamera] And I am watching him [the
25 customer] walk home by himself, because I am driving his car away."
26 BARRIOS replied, "You are ruthless, dude." SIDAROS asked, "Where

27 _____
28 ⁶ "IACO'S HOME" refers to 5227 Soledad Mountain Rd.,
San Diego, California 92109.

1 should I park it?" BARRIOS suggested "[i]n front of your house."
2 SIDAROS replied, "No, no, 'cause he knows where I live" and SIDAROS
3 didn't want the customer "to come by my house to try to pick this up
4 when I am not around."

5 77. Half an hour later, at 12:30 p.m., BARRIOS related this
6 story to someone else, saying, "Ed's crazy, dude. Some homeboy
7 [customer] owes him, like, . . . 40 grand [\$40,000]" and "homeboy
8 showed up in his Panamera Porsche to give Ed chump change . . . two
9 or three thousand dollars. . . . and wearing a fucking Rolex. . . .
10 So, Ed took the car from the dude."

11 78. \$7,120 to Customer Adam's Account (TT#2 / #328 / 1/25/2013
12 @14:47): On January 25, 2013, BARRIOS said, "I want to keep your
13 bookkeeping straight. Okay. That \$10,000 that you gave me, [\$]2880
14 of it is yours and the rest of it goes toward [customer] Adam's
15 account, right?" SIDAROS replied, "Right."

16 79. Surveillance - BARRIOS Hands SIDAROS \$15,550 at Gold's Gym
17 & SIDAROS Delivers It to GHARIBEH at a Mobil Mart (1/29/2013): On
18 January 29, 2013, BARRIOS told Isaac GHARIBEH, "I'm getting ready to
19 leave the gym right now. Ed's with me." (Agents then observed
20 BARRIOS walking out of Gold's Gym with Emed SIDAROS, aka Ed.) BARRIOS
21 said he would give "Ed" \$15,550 to deliver to GHARIBEH at a Mobil
22 Mart. BARRIOS then handed SIDAROS a large amount of cash, while
23 SIDAROS was sitting in his car. Agents followed SIDAROS as he drove
24 from the Gold's Gym to a Mobil Mart, where he met briefly with
25 GHARIBEH. (TT#2, session 763, 1/29/13 @16:26.)

26 **B. VIOLENCE/THREATS**

27 80. On February 9, 2013, SIDAROS talked about threatening a
28 customer who owed him "two grand [\$2,000]" by going to the bank where

1 the customer worked to "make a scene. [Saying:] 'I bank here, you
2 motherfucker! You want to ignore my calls and treat me like a little
3 bitch?!'" SIDAROS said, "I'm not gonna go in there and fucking beat
4 the guy up." BARRIOS replied, "No, there's fucking cameras
5 everywhere."

6 7 8 9 10 11	11 Isaac Pete GHARIBEH Role: Sub-Bookie for BARRIOS DOB: xx/xx/1970 SSN: xxx-xx-4393	
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12
13 **A. WIRETAP EXAMPLES**

14 81. Deliver \$15,550 to Mobil Mart (TT#2 / #763 / 1/29/2013
15 @16:26): On January 29, 2013, BARRIOS told GHARIBEH that he would give
16 \$15,550 to "Ed" (SIDAROS), who would bring the money to GHARIBEH at
17 a "Mobil Mart" gas station. That same day agents observed BARRIOS
18 giving a cash payment to SIDAROS, who then drove to a Mobil Mart gas
19 station, where he met briefly with GHARIBEH (to give him the money).

20 82. "[\$]18,432" in Gambling Losses (TT#2 / #1836 / 2/5/2013
21 @13:49): On February 5, 2013, BARRIOS said he wanted to "go through
22 some numbers." GHARIBEH said, "Let me get some paper." Then BARRIOS
23 listed names or categories with winnings or losses, representing the
24 totals for all betting customers in GHARIBEH's package. (BARRIOS even
25 included GHARIBEH's personal betting, saying, "Gambling plus 253 [\$253
26 of winnings]," and GHARIBEH responded, "[\$]253 personal.") At the
27 end, BARRIOS said, "Altogether, [\$]18,432 [in gambling losses for the
28 whole package]."

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12	Dunzmy June NGUYEN Role: Sub-Bookie and Runner for BARRIOS DOB: xx/xx/1975 SSN: xxx-xx-2019
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A. WIRETAP EXAMPLES

83. Collecting "[\\$]3,000 and Change" in Sherman Oaks (TT#2 / #1906 / 2/5/2013 @17:00), with Surveillance: On February 5, 2013, BARRIOS asked NGUYEN if she was "available on Friday [February 8, 2013] to pick up some money in Sherman Oaks?" BARRIOS said there would be "an envelope . . . which has like [\\$]3,000 and change in it. The address is 13437 Ventura Boulevard, Suite [specific number omitted], Sherman Oaks, California." NGUYEN said, "Okay, I will get it Friday morning."

84. On Friday, February 8, 2013, at 11:17 a.m., agents observed a white Range Rover (registered to Phue Nguyen at a Marina Del Rey address) arrive at 13437 Ventura Boulevard in Sherman Oaks and park around the building's corner. At 11:25 a.m., agents observed NGUYEN walk away from the building, get into the Range Rover, and depart. At 13:15, NGUYEN called BARRIOS and said, "I'm done. I got everything."

85. At the end of that call, BARRIOS said, "Just bring it all." NGUYEN replied, "I'll be over there in a little bit." At 13:30, agents observed the white Range Rover arrive at BARRIOS'S HOME.⁷

⁷ "BARRIOS'S HOME" refers to 2809 Ocean Front Walk, Venice, CA 90291.

1 BARRIOS walked outside and stood by the Range Rover while the driver,
2 who resembled NGUYEN, handed BARRIOS an envelope or small package,
3 which BARRIOS pocketed.

4 86. "[\$]9090" for NGUYEN's "Package" (TT#2 / #2704 / 2/11/2013
5 @17:36): On February 11, 2013, BARRIOS went through the figures in
6 NGUYEN's sub-bookie "package," concluding with, "I need [\$]9090."
7 NGUYEN said, "Okay." NGUYEN also asked, "Any more other runs
8 [collections]? I'd like some more runs."

9 10 11 12 13 14	13 Todd Michael HEFLIN Role: Sub-Bookie for BARRIOS DOB: xx/xx/1967 SSN: xxx-xx-8230	
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15 A. WIRETAP EXAMPLES

16 87. Doing "Some Numbers" (TT#2 / #1805 / 2/5/2013 @13:01): On
17 February 5, 2013, BARRIOS and HEFLIN go over "some numbers" for
18 HEFLIN's package, listing several 4-digit account numbers, followed
19 by the amount that the customer won or lost.

20 88. "He's Afraid for His Life" (TT#2 / #2910 / 2/13/2013
21 @11:30): On February 13, 2013, HEFLIN and BARRIOS discussed how they
22 were having trouble collecting \$56,000 from a customer who had been
23 referred to MACHO SPORTS by a bartender (M.A.). M.A. was terrified
24 that MACHO SPORTS might send someone to hurt him for referring a
25 deadbeat customer, which made HEFLIN afraid that M.A. might go to the
26 police. HEFLIN said, "This fuckin' guy's freaking out and he wants
27 to go the police. . . . [M.A.] the bartender. . . . because he's
28 panicked, because he's afraid for his life." BARRIOS replied, "Well,

1 you made him afraid for his life." HEFLIN said, "[H]e's afraid of his
2 life, because of this guy's not paying and he knows that people are
3 going to be looking for him if he doesn't pay."

4 89. What HEFLIN Will Tell the Police If Arrested (TT#2 / #2910
5 / 2/13/2013 @11:30): On February 13, 2013, HEFLIN said, "What if he
6 [M.A.] goes in [to the police] and says it's a gambling thing . . .
7 and then he spills the fuckin' beans about everybody -- me, you."
8 BARRIOS replied, "Well, he doesn't know anything about me unless you
9 tell him." HEFLIN said, "Well, if I get fuckin' drug [dragged] in,
10 and they fuckin' put me under the fuckin' hot light, what am I going
11 to do?" BARRIOS said, "I'll get you a great attorney. Don't say
12 nothin'. . . . [And tell the police:] 'What do you mean? I'm a
13 plumber! What the fuck are you talkin' about?" (During the
14 February 15, 2013 call discussed below, BARRIOS reiterated this
15 strategy for obstructing justice when he told HEFLIN that if the
16 police "don't find any evidence or paperwork that shows you're a
17 bookie, [then] you're a third-generation plumber and you can show
18 them.")

19 90. Assaulting Bob from Calabasas (TT#2 / #3201 / 2/15/2013
20 @11:08): BARRIOS asked HEFLIN for the information on a delinquent
21 customer, "Bob from Calabasas," so that their enforcers could assault
22 him later. BARRIOS said, "They're gonna want all the information that
23 you have on this guy [Bob from Calabasas] And they're not
24 gonna go fuck him up tomorrow. They're gonna wait six months to a
25 year. . . . and he's gonna get the shit beat out of him for
26 sure. . . . It's only fair. . . . I've been through this a million
27 times."

28 //

1 **B. VIOLENCE/THREATS**

2 91. HEFLIN's wife (D.H.) threatened a delinquent customer's
3 ex-wife (saying, "I'd be afraid for my child's life"), when she,
4 HEFLIN, and M.A. were trying to find that delinquent customer.
5 Afterwards, according to BARRIOS, "Todd [HEFLIN] went and put the fear
6 of death into this bartender [M.A.], and the bartender also [said],
7 'If anyone comes in the bar, or anyone fuckin' threatens me of any
8 kind, I will go to the police.'"

9 92. Also, HEFLIN is aware MACHO SPORTS uses violent enforcers.
10 For example, on February 13, 2013, HEFLIN discussed M.A.'s fear for
11 his life, since he had referred a customer to MACHO SPORTS who was
12 refusing to pay his gambling debts. During the call, HEFLIN commented
13 that M.A. was "afraid of his life, because of this guy's not paying
14 and he [M.A.] knows that people are going to be looking for him if he
15 doesn't pay."

16	14	Howard Alan BLUM	
17		Role: Sub-Bookie for MOKAYEF	
18		DOB: xx/xx/1962	
19		SSN: xxx-xx-7122 or xxx-xx-7127	
20			
21			
22			

23 **A. WIRETAP EXAMPLES**

24 93. New Account, Password "Poker" (TT#1 / #3947 / 1/24/2013
25 @17:46): On January 24, 2013, BLUM left a voicemail for MOKAYEF,
26 saying that he needed "a new account for a friend . . . [\$]5,000 cap,
27 [\$]1,000 max per game, even up at [\$]2,000, make the password
28 'poker.'"

1 94. "You Can Send a Runner or Go Through Me" (TT#1 / #3988 /
2 1/25/2013 @10:06): On January 25, 2013, BLUM told MOKAYEF he wanted
3 to set up an account for "Doc," whose real name is "Emad Mikhail," who
4 has been "making a bunch of \$200 bets." BLUM asked for a "\$5,000
5 cap, 5 [\$500] per game, and even up at \$2,000. . . . You can send
6 a runner or go through me."

7 15 Michael John MASSEY 8 Role: Sub-Bookie for MOKAYEF 9 DOB: xx/xx/1968 10 SSN: xxx-xx-5205 11 12 13	
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14 A. WIRETAP EXAMPLES

15 95. MASSEY Delivers Customer 5826's \$26,800 in Losses to MOKAYEF
16 (TT#1 / #1141): On November 14, 2012, at 17:47, MASSEY told MOKAYEF,
17 "I just got, myself, [account] 5826, 26-8 [\$26,800]. I got it, so can
18 you come pick it up, can you come by the office [MASSEY'S WORK⁸]
19 tomorrow?" They agreed to meet the following morning. The next day
20 at 11:08 a.m., agents observed MOKAYEF enter MASSEY'S WORK empty-
21 handed and meet with an unidentified male. At 11:24 a.m., MOKAYEF
22 left the business with a bulky manila envelope.

23 //

24
25 ⁸ "MASSEY'S WORK" refers to 5401 Linda Vista Rd., Suite 404,
26 San Diego, CA 92110, which was the work address for San Diego
27 Silkscreen & Embroidery in November 2012. (Later it was at Suite
28 409.) In November 2012, the company's website, www.sdsilkscreen.com,
listed the contact information for the company as "Mike" at
(858) 205-3900, which is the phone Michael John MASSEY was intercepted
using. That phone is subscribed to "John Massey" at MASSEY'S WORK.

1 96. "Put Your Kids Through F-in' College in a Month" (TT#1 /
2 #4498 / 2/4/2013 @12:19): On February 4, 2013, MASSEY told MOKAYEF
3 that he is going to "collect from everyone . . . and then there was
4 a couple winners and we'll figure it out." MOKAYEF said that he owed
5 MASSEY "\$15,719" for his package, plus MASSEY's personal betting
6 account was "plus \$39," so "\$15,758 is what we owe you." They
7 also discussed a potential customer, "Teddy," and some other high-
8 rolling potential customers. MOKAYEF said, "I guarantee, MASSEY, you
9 get this Teddy guy and these guys, you're gonna put your kids through
10 fuckin' college in a month."

11 97. "\$110,000" Credit Limit (TT#1 / #3095 / 12/25/2012
12 @16:18): On December 25, 2012, MASSEY said customer Jason wanted to
13 pay off "the \$58,520" he owed on his account, and MASSEY assumed
14 that Jason had been "betting on basketball." MOKAYEF told MASSEY to
15 instruct the customer to "do another cashier's check and make it
16 payable to Joe Bradley. . . . If the check is over 50 [\$50,000], he
17 needs to break it up into two checks both made out to Joe Bradley."
18 If the customer pays off his balance, MOKAYEF will give him a
19 "\$110,000" credit limit, since Jason is "plus 10 [\$10,000 in
20 winnings]" for the past week.

21 **B. SURVEILLANCE**

22 98. MASSEY Delivers Cash to MOKAYEF (12/11/2012): On
23 December 11, 2012, at 10:02 a.m., MASSEY said, "[S]hould be there
24 [MASSEY'S WORK] within 20 minutes." MOKAYEF replied, "Okay, you got
25 it. I'll shoot on over there." At 10:22 a.m., agents saw MOKAYEF
26 arrive empty-handed at MASSEY'S WORK and walk inside. At the time,
27
28

1 MASSEY'S FORD EXPLORER⁹ was parked in front of MASSEY'S WORK. At
2 10:42 a.m., MOKAYEF left, carrying a bulky manila envelope.

3 4 5 6 7 8 9	16 Salvatore Giacomo GROppo Role: Sub-Bookie for MOKAYEF DOB: xx/xx/1975 SSN: xxx-xx-2219 Record: 1996: (inf) Petty Theft	
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10 **A. WIRETAP EXAMPLES**

11 99. Account for New Customer "John Marcellus" (TT#1 / #1896 /
12 11/26/2012 @17:23): On November 26, 2012, GROppo said, "I need a line
13 [new account] set up." MOKAYEF said, "Okay. What's the guy's name?"
14 GROppo said, "[Customer's name], he's up in L.A." MOKAYEF asked, "How
15 much?" GROppo replied, "3K [\$3,000] line pay at [\$]1,500 up
16 or down, \$500 max bet." GROppo asked for the password to be set at
17 "JOMAR."

18 100. "On Board" with "MACHO" (TT#1 / #3042 / 12/23/2012 @19:43):
19 On December 23, 2012, GROppo told MOKAYEF that new customer "Derek
20 might jump on board." MOKAYEF asked, "What do you mean, 'on board'?"
21 GROppo replied, "On board, Macho [MACHO SPORTS]."

22 101. "The Groppo Package" (TT#1 / #4444 & 4447-48 / 2/3/2013):
23 On February 3, 2013, at 14:25, GROppo called MOKAYEF to ask him "to
24 set up an account" for a new customer. MOKAYEF asked, "How much?"
25 GROppo responded "\$1,000" and that his password would be "Valen."
26

27 ⁹ "MASSEY'S FORD EXPLORER" refers to a silver Ford Explorer,
28 bearing California license plate number 4VWA121 and registered to
Michael MASSEY at MASSEY's home address in San Diego, California.

1 MOKAYEF said, "Alright, I'll call you right back with an account
2 number." At 14:27, MOKAYEF called **Macho Sports Unpublished Number** and
3 asked to "open a new account under the GROPPPO package." The operator
4 gave him account number "5436," and MOKAYEF said to "set the password
5 as 'Valen.' \$1,000/\$1,000." At 14:28, MOKAYEF called GROPPPO back to
6 say, "5436 - he's set up."

7 8 9 10 11 12 13	17 Nilesh Kumar Ambubhai PATEL, aka Neil Role: Sub-Bookie for MOKAYEF DOB: xx/xx/1986 SSN: xxx-xx-8048	
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14 **A. WIRETAP EXAMPLES**

15 102. Depositing \$500 to PATEL's "Client" (TT#1 / #2393 & 2455):
16 On December 12, 2012, at 17:19, MOKAYEF said he would deposit \$500 in
17 PATEL's customer's bank account "probably tomorrow when I land in
18 San Francisco." PATEL said, "My client was just asking me, and I
19 didn't want to cover him this time, so I told him to wait." MOKAYEF
20 said, "Just tell him it will be there. It's only \$500." The next
21 day, on December 13, 2012, at 11:27, PATEL told MOKAYEF, "You put four
22 [\$400], not five [\$500]." They decided to ask the customer to take
23 the "other one [\$100]" the next week, but if not, MOKAYEF said, "I
24 have no problems trying to find a bank."

25 103. "Account 5149 Wanted to Pull His [\$]1,000 Out" (TT#1 / #3182
26 / 12/26/2012 @18:28): On December 26, 2012, PATEL said, "Account 5149
27 wanted to pull his [\$]1,000 out." MOKAYEF then ran through a number
28 of figures, concluding with "[\$]1674 is gonna be your make-up figure,

1 alright?" PATEL repeated, "[\\$]1674." (That is, PATEL's package - all
2 his customers - had total net winnings of \$1,674.)

3 4 5 6 7 8	18 Benjamin John William WEBER Role: Sub-Bookie for MOKAYEF DOB: xx/xx/1985 SSN: xxx-xx-2685	
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10 **A. SURVEILLANCE/IDENTIFICATION OF WEBER AS A TORREY PINES STARTER**

11 104. On December 20, 2012, MOKAYEF told UC-2 that his friend
12 "Ben" (Benjamin WEBER) was the "golf starter" at Torrey Pines Golf
13 Course, which is in fact WEBER's job.¹⁰ Later that day, surveillance
14 agents observed MOKAYEF meeting with Benjamin WEBER at Torrey Pines
15 Golf Course. In prior intercepted calls, MOKAYEF and WEBER had
16 arranged this meeting for MOKAYEF to pay WEBER's "percentage"
17 (commission) on a client.

18 **B. WIRETAP EXAMPLES**

19 105. "I want to get paid, too." (TT#1 / #2429 / 12/12/2012
20 @20:31): On December 12, 2012, MOKAYEF complained about WEBER's
21 failure to get a customer to pay his roughly \$43,000 gambling debt.
22 MOKAYEF said, "It has been over a month of \$42,500 that is owed to the
23 office. I don't like it." WEBER said, "Trust me, I want to get paid,
24 too. . . . We will make it happen. I need the money myself." MOKAYEF
25 retorted, "I understand that you need the money. I don't need the
26

27 ¹⁰ Indeed, there is even an article about how often "Ben Weber"
28 gets hit by golf balls. See "City Worker a Moving Target for Wayward
Shot," *San Diego Union-Tribune* (1/27/2012).

1 money. I wipe my ass with \$43,000. It is the fucking principle of
2 the whole goddamn thing."

3 106. New Account for Customer S.G. (TT#1 / #3000, 3002-03 /
4 12/22/2012): On December 22, 2012, at 16:01, WEBER said he wanted to
5 "set up an account for about [\$]2,000, but would settle for
6 [\$]1,000," for "[A customer with initials S.G.] he owns All
7 Pro Bail Bonds." MOKAYEF said, "I'll set it up as 'SG' for the
8 password." At 16:03, MOKAYEF called **Macho Sports Unpublished Number**
9 to set up account "5131" and to "make it a password 'SG.'" Put it into
10 the TP [Torrey Pines] package. . . . [\$]2,000 cap, [\$]1,000 per game."
11 At 16:06, MOKAYEF called WEBER back and said, "5131. . . . 'SG' is his
12 password. He's all set up."

13 **B. VIOLENCE/THREATS**

14 107. The wiretap confirmed that WEBER is aware that MACHO SPORTS
15 uses violent enforcers. On December 12, 2012, at 20:31, WEBER tried
16 to forestall the use of more aggressive debt collection tactics with
17 customer Armando, who owed about \$43,000. WEBER told MOKAYEF, "Going
18 to his house is not the right move. That will cause all kinds of
19 shit, dude, and I don't want that happening. Let me take care of it."
20 MOKAYEF responded, "It's not my call. My guys are asking what the
21 fuck is going on?"

22 **III**

23 **FORFEITURE**

24 108. Public and business records confirm the details set forth
25 in the Complaint concerning the properties listed for forfeiture. As
26 to each of these specific properties, the following facts establish
27 that each property is subject to forfeiture:

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1 a. Bank of America account number 01703-40000 in the name
2 of Mokayef Capital, Inc., which was opened by defendant AMIR MOKAYEF
3 as the President of Mokayef Capital, Inc., on or about February 28,
4 2005: The funds in this account are the proceeds of the charged
5 crimes, because it appears MOKAYEF has no other legitimate source of
6 income during the time frame this account has been open. On
7 December 5, 2012, MOKAYEF said, "I've been doing business with them
8 [the MACHO SPORTS website owners] for 16 or 17 years now [since 1995
9 or 1996]." On September 26, 2011, during a consensually recorded
10 conversation with UC-2, MOKAYEF said that he started in the business
11 of handling sports bets in 1996 and that he does this as his full-time
12 job. According to a records check of California's Employment
13 Development Department (EDD) for 2012 and 2013, MOKAYEF's only
14 reported employer is Mokayef Capital, Inc. This appears to be a shell
15 company. During wiretapped calls, MOKAYEF often asked betting
16 customers to write checks to "Mokayef Capital, Inc." in order to pay
17 off their gambling debts. Open source databases indicate that MOKAYEF
18 is the sole principal and President of Mokayef Capital, Inc.
19 Furthermore, MOKAYEF's admissions during wiretapped calls and
20 consensually recorded undercover conversations suggest that this has
21 been his only occupation for many years.

22 b. Wells Fargo Bank account number 73479200 in the name
23 of Amir Mokayef Separate Property Trust, which was opened by defendant
24 AMIR MOKAYEF as the trustee on or about May 20, 2009: The funds in
25 this account are the proceeds of the charged crimes, because it
26 appears MOKAYEF has no other legitimate source of income during the
27 time frame this account has been open. See discussion above in
28 subparagraph a.

1 c. Union Central policy number A00013128F in the name of
2 "Mokayef Capital, Inc. 401k Profit Sharing Plan," which was opened by
3 defendant AMIR MOKAYEF as the President of Mokayef Capital, Inc., on
4 or about February 19, 2010: According to investment account records,
5 MOKAYEF opened this account using funds entirely originating from Bank
6 of America account number 01703-40000 (discussed above in
7 subparagraph a). Specifically, MOKAYEF used money from Bank of
8 America account number 01703-40000 (MOKAYEF'S MAIN BoA ACCOUNT) to
9 fund Bank of America account 01705-40707 in the name of "Mokayef
10 Capital, Inc. 401(K) Profit Sharing" (MOKAYEF'S BoA 401(K) ACCOUNT).
11 All of the funds in MOKAYEF'S BoA 401(K) ACCOUNT came from MOKAYEF
12 MAIN BoA ACCOUNT and interest payments on that money. MOKAYEF then
13 used money in MOKAYEF'S BoA 401(K) ACCOUNT to purchase and fund Union
14 Central policy number A00013128F.

15 d. AEI Accredited Investor Fund VI account number
16 0170540707 in the name of "Mokayef Capital Inc. 401K PSP," which was
17 opened by defendant AMIR MOKAYEF as the President of Mokayef Capital,
18 Inc., on or about March 8, 2010: According to investment account
19 records, MOKAYEF also used funds from MOKAYEF'S BoA 401(K) ACCOUNT to
20 purchase and fund AEI Accredited Investor Fund VI account number
21 0170540707.

22 e. SEI Private Trust Company account number 415940 with
23 a plan name of "Mokayef Capital, Inc. 401K," which was opened by
24 defendant AMIR MOKAYEF as the President of Mokayef Capital, Inc., on
25 or about September 1, 2010: According to investment account records,
26 MOKAYEF also used funds from MOKAYEF'S BoA 401(K) ACCOUNT to purchase
27 and fund SEI Private Trust Company account number 415940.

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1 f. Wells Fargo Bank account number 677385759 in the name
2 of Joseph Barrios, which was opened by defendant JOSEPH BARRIOS, aka
3 JB, on or about May 6, 1994: The funds in this account are the
4 proceeds of the charged crimes, because it appears BARRIOS has no
5 other legitimate source of income during the time frame this account
6 has been open. On January 26, 2013, at 22:22, BARRIOS told GHARIBEH,
7 "I've been doing this [bookmaking] for 24 years [since 1989]."
8 According to an EDD records check for 2013, BARRIOS has no reported
9 employer whatsoever. An analysis of this account dating back to 2011
10 shows regular large cash and check deposits in round numbers, which
11 is consistent with depositing cash payments or laundered money from
12 bookmaking. For example, according to Wells Fargo Bank records, on
13 April 25, 2012, there was a \$67,000 cash deposit in this account, and
14 two days later, on April 27, there was a \$9,000 cash deposit in this
15 account.

16 g. Wells Fargo Bank account number 8633243194 in the name
17 of Joseph Barrios Irrevocable Trust, which was opened by defendant
18 JOSEPH BARRIOS, aka JB, as the trustee on or about January 4, 2008:
19 The funds in this account are the proceeds of the charged crimes,
20 because it appears BARRIOS has no other legitimate source of income
21 during the time frame this account has been open. See discussion
22 above in subparagraph f.

23 h. Wells Fargo Bank account number 6786700523 in the name
24 of Joseph Barrios, which was opened by defendant JOSEPH BARRIOS, aka
25 JB, on or about May 17, 2012: This account was opened and funded
26 entirely with a transfer of funds from Wells Fargo Bank account number
27 677385759 (discussed above in subparagraph f), according to Wells
28 Fargo Bank records.

1 i. An Audi R8, currently registered to Joseph Barrios,
2 bearing VIN WUAVNAFG5BN001171, which was purchased by defendant JOSEPH
3 BARRIOS, aka JB, in or about 2012: In 2012, BARRIOS purchased this
4 vehicle outright for \$147,000, according to California Department of
5 Motor Vehicles (DMV) records. Although there are a number of dates
6 (all in 2012) on the DMV documents associated with this purchase, the
7 latest date reflected on the documents is April 19, 2012. On that
8 same date (April 19, 2012), BARRIOS withdrew \$147,460 from Wells Fargo
9 Bank account number 677385759 (discussed above in subparagraph f),
10 according to Wells Fargo Bank records.

11 j. The real property located at 5848 Soledad Road,
12 La Jolla, California (which defendant AMIR MOKAYEF purchased on or
13 about October 20, 2006), legally described as: Assessor's Parcel
14 Number (APN) 358-192-10, Lot 42 of Soledad Corona Estates Unit No. 1
15 in the City of San Diego, County of San Diego, State of California,
16 according to map thereof no. 4008, filed in the Office of the County
17 Recorder of San Diego County on November 7, 1958: In October 2006,
18 MOKAYEF bought this real property (MOKAYEF'S HOME), according to
19 property records. In 2011, MOKAYEF married a woman who currently has
20 the initials A.M., based on marriage records for San Diego County,
21 California. According to property records: (1) in 2011, MOKAYEF
22 deeded MOKAYEF'S HOME from himself to Amir MOKAYEF and A.M.; and
23 (2) in 2012, MOKAYEF and A.M. deeded MOKAYEF'S HOME to Amir Mokayef,
24 trustee of the Amir Mokayef Separate Property Trust; and (3) as of
25 June 2013, the title for MOKAYEF'S HOME is still in the name of Amir
26 Mokayef, trustee of the Amir Mokayef Separate Property Trust. As of
27 January 2, 2013, there was \$790,520.53 remaining to pay off the
28 mortgage on MOKAYEF'S HOME, according to Well Fargo Bank records.

1 Since MOKAYEF had no legitimate source of income during the period of
2 the charged crimes (which includes the date he purchased MOKAYEF'S
3 HOME and the period of the mortgage), there is probable cause to
4 believe MOKAYEF'S HOME was paid for entirely with proceeds of the
5 charged crimes.

6 IV

7 REQUEST TO SEAL

8 109. I request that the Complaint and this Probable Cause
9 Statement be filed under seal, with the exception that the
10 United States should be allowed to share the Complaint and Probable
11 Cause Statement with other law enforcement agencies, foreign officials
12 (for the purposes of arresting and/or extraditing defendants who are
13 overseas, including in Peru and Norway), and court officials (for
14 further proceedings in this case, including seeking warrants to
15 search, seize, and arrest).

16 110. Failure to seal these documents is likely to lead to the
17 following adverse results:

18 a. Endangering the life or physical safety of an
19 individual: As described above, MACHO SPORTS engages in intimidation,
20 threats, and violence as part of its illicit business. If the details
21 of this investigation were exposed prematurely, it is likely that
22 MACHO SPORTS members would seek to harm potential witnesses. In fact,
23 one witness who is familiar with Jan and Erik PORTOCARRERO expressed
24 fear about the prospect of the PORTOCARREROS learning that the witness
25 had spoken to law enforcement, because of how powerful they are.

26 b. Flight from prosecution: As described above, during
27 1997-2003 Jan and Erik PORTOCARRERO had various law enforcement
28 contacts relating to their bookmaking in the Los Angeles area. Likely

1 because of these experiences and to evade U.S. law enforcement in the
2 future, Jan and Erik PORTOCARRERO located the MACHO SPORTS
3 headquarters outside the United States. (Macho Sports International,
4 Corp., was registered in Panama in 2002 and granted authority to
5 operate in Peru in 2008.) In fact, on December 7, 2012, at 15:40,
6 MOKAYEF asked a MACHO SPORTS manager for advice on how he could become
7 as powerful a bookmaker as "Leo" (Jan PORTOCARRERO), "not necessarily
8 the amount Leo's making, just how to be Leo." The manager replied,
9 "You can't live in the States for that, buddy." Thus, it is likely
10 that premature notice of this investigation would encourage MACHO
11 SPORTS members to flee or to remain outside of the United States.

12 c. Destruction of or tampering with evidence: As discussed
13 above, BARRIOS advised HEFLIN on at least two occasions in February
14 2013 to lie to police if he were ever questioned about his bookmaking
15 activities. BARRIOS also emphasized the importance of hiding
16 documentary bookmaking evidence from law enforcement, saying that if
17 the police "don't find any evidence or paperwork that shows you're a
18 bookie, [then] you're a third-generation plumber and you can show
19 them." Based on this entire investigation, it is likely that
20 premature disclosure of the existence of this investigation would lead
21 MACHO SPORTS members to destroy or tamper with evidence.

22 d. Intimidation of potential witnesses: Since MACHO SPORTS
23 regularly intimidates its customers to ensure payment of gambling
24 debts, as described above, it is likely that MACHO SPORTS members
25 would also use intimidation against potential witnesses. As mentioned
26 above, at least one witness has expressed fear of retaliation from Jan
27 and Erik PORTOCARRERO.

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1 e. Otherwise seriously jeopardizing an investigation: As
2 the above discussion makes clear, premature disclosure of this
3 Complaint, and its Probable Cause Statement, would seriously hinder
4 our ability to continue to gather evidence against the defendants and
5 to prepare for their arrests and/or extraditions. In the past month,
6 the FBI received information that Erik PORTOCARRERO was in Norway and
7 Young KOH was in Peru. FBI agents continue to work with both domestic
8 officials and officials in Peru and Norway to gather evidence and
9 effect the future arrests of all the defendants.

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