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UNITED STATES DISTRICT COURT

for the
Western District of Texas

JUN - 1 2015

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY [Signature]
DEPUTY

United States of America)
v.)
HASSAN AL HOMOUD (1))
and)
ZAINAB AL HOSANI (2))

Case No. SA: 15-MJ-0460(1,2)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 24, 2014 through April 9, 2015 in the county of Bexar, Texas in the
Western District of Texas, the defendant(s) violated:

Code Section
18 U.S.C. §1589

Forced Labor

Offense Description

This criminal complaint is based on these facts:

See Attached Affdvt.

Continued on the attached sheet.

[Signature]

Complainant's signature

SPECIAL AGENT, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: May 30, 2015

[Signature]

Judge's signature

City and state: SAN ANTONIO, TX

PAMELA A. MATHY, US MAGISTRATE JUDGE

Printed name and title

SEALED

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

Affidavit in Support of a Criminal Complaint

I, Edward Acuna, herein known as the Affiant, duly sworn, do depose and state the following:

I. INTRODUCTION

- A. I am an Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), Special Agent (SA) currently assigned to the Office of the Assistant Special Agent in Charge (ASAC) in San Antonio, Texas. I have been employed as a Special Agent with Homeland Security Investigations since February 3 2003. Prior to becoming an HSI Special Agent, I was employed as a Supervisory Border Patrol Agent for the United States Border Patrol, Department of Justice from September 1994 until February 2003. Prior to that, I served as a Military Police with the US Army from April 1985 until September 1994.
- B. I have led or assisted in a wide variety of criminal investigations, to include the manufacturing and distribution of illegal narcotics, gang related crimes, human smuggling/human trafficking and other criminal violations. As a Special Agent with Homeland Security Investigations, I have assisted with or lead investigations involving violations of criminal statutes found in the United States Code under Titles 8, 18 and 21. Specifically, I have assisted with or lead cases involving human smuggling investigations into the United States from other countries. Additionally, I have received training in the enforcement of laws concerning narcotics distribution, human smuggling and human trafficking investigations as found in Title 8, 18 and 21, United States Code. I know it to be a violation of **Title 18, United States Code sections 1589(a) and 2**, for any person to knowingly provide or obtain, or to aid and abet in providing or obtaining, the labor or services of a person by means of force, threats of force, physical restraint, threats of physical restraint, serious harm or threats of serious harm to the victim-worker or another person; or by means of abuse or threatened abuse of law or legal process; or by means of any scheme, plan or pattern intended to cause a person to believe that, if the victim-worker did not perform such labor or services, that the victim-worker or another person would suffer serious harm or physical restraint.

II. PROBABLE CAUSE

- A. On April 9, 2015 the San Antonio Police Department (SAPD), encountered Victim-worker #1, hereinafter "R.O." on the 6400 block of Camp Bullis. She

appeared to be in distress and was transported to the police department. R.O. told federal agents that she is a citizen of the Republic of Indonesia and was brought to San Antonio, Texas, on or about June 24, 2014, from the State of Qatar, by Hassan AL HOMOUD, a citizen of the State of Qatar, and his wife, Zainab AL HOSANI, a citizen of the United Arab Emirates, to serve as a housemaid.

- B. R.O. directed law enforcement to her apartment on Camp Bullis, where law enforcement officers discovered Victim-worker #2, hereinafter "R.R." Like R.O., R.R., a citizen of the Republic of Bangladesh, was also brought to San Antonio, Texas, from the State of Qatar, arriving on June 24, 2014, to work for AL HOMOUD and AL HOSANI. According to her employment contract, her designated position was that of a servant.
- C. The apartment in which the victim-workers slept was virtually empty -- absolutely no furnishings, minimal toiletries (no toilet paper), no linens, no utensils, minimal food (stale leftovers), no clothes, no television, no reading material, and no communication devices. In fact, AL HOMOUD had confiscated R.O.'s personal cell phone. There were two blankets and pillows on the floor. R.O. and R.R. did not possess a key to the apartment.
- D. R.O. and R.R. told your affiant they have never been paid for their labor. According to the victim-workers, not being permitted to speak directly to AL HOMOUD, they spoke to AL HOSANI on several occasions requesting payment of their wages. Additionally, R.O. and R.R. stated they have no U.S. currency, no cell phones, and no transportation. Most importantly, R.O. and R.R. told your Affiant that AL HOMOUD had taken and maintain their passports and visa documents.
- E. According to the *Domestic Employee Contract* attached to R.O. and R.R.'s A3 Visa Application, for which AL HOMOUD provided sponsorship, R.O. and R.R. earned a monthly salary, which was to be paid monthly, of \$1,573.87.
- F. R.O. and R.R. explained that each morning they were transported from the apartment on Camp Bullis, San Antonio, TX, to AL HOMOUD and AL HOSANI's expansive residence in The Dominion in San Antonio, TX, where they provided housekeeping services throughout the day, at the direction of AL HOSANI. For nourishment, the victim-workers were permitted to avail themselves to leftovers from the family meals. However, R.O. and R.R. limited their food and water intake throughout the day as their access to the toilets in the residence was extremely limited and often forbidden. R.O. and R.R. were not permitted to rest or relax in the family residence; instead, when not working, R.O. and R.R. stated they stayed "in a plastic box" in the garage. On one occasion, R.O. and R.R., having not been transported to the apartment, were forced to sleep "in the plastic box." During the investigation, federal agents interviewed a neighbor who stated she observed, and noted as odd, a portable shed-type structure inside the garage of the AL HOMOUD and AL HOSANI residence. Another

neighbor regularly saw the victim-workers outside washing the family vehicles. Another neighbor reported hearing crying coming from the garage.

- G. R.O. and R.R. told your Affiant they continued working without pay because they had no one to turn to, nowhere to go, no money and most importantly, no passport. They were also afraid to leave without the pay they were due, as these are funds intended for their families in Bangladesh and Indonesia. R.R. also stated, AL HOSANI threatened that if they breached their contract they would go to jail in Qatar.
- H. HSI Special Agents spoke with AL HOMOUD on April 10, 2015, and he stated he did have the victim-workers' passports, which he ultimately relinquished to federal agents. Agents also spoke to AL HOMOUD on April 13, 2015, and again on April 29, 2015. During those meetings, AL HOMOUD admitted he had not paid R.O. or R.R. And, on April 29, 2015, he relinquished R.O.'s cell phone which he had taken from her.
- I. On one occasion, AL HOSANI beat R.O. with a stick for digging in the trash in search of food.

III. CONCLUSION

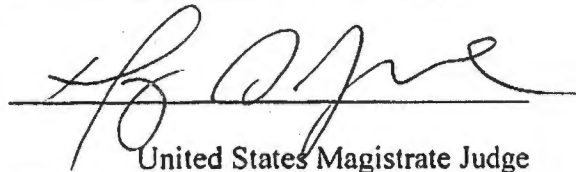
Based on all the foregoing facts this Affiant believes that probable cause exists to show that HASSAN SALEM AL HOMOUD and ZAINAB MOHAMED HASAN HATIM AL HOSANI, aiding and abetting one another, committed the offense of Forced Labor, in violation of Title 18, United States Code, Sections 1589(a) and 2, and that a warrant should be issued for the arrest of HASSAN SALEM AL HOMOUD and ZAINAB MOHAMED HASAN HATIM AL HOSANI.



Edward Acuna

Special Agent, Homeland Security Investigation

Subscribed and sworn to before me this 30th day of May, 2015.


United States Magistrate Judge