



The following is an excerpt from a criminal complaint regarding an alleged prostitution ring, the Emperors Club VIP.

A law enforcement official has told The Associated Press that New York Gov. Eliot Spitzer is the person identified in the complaint as “Client 9.” The discussion of “Client 9” begins with section “a” on page 26 and ends with the top two lines of page 31.

text messages relating to the interstate transportation are summarized below.

a. February 15, 2008, Interstate Transportation  
From California To Las Vegas, Nevada

70. On February 7, 2008, at approximately 12:13 a.m., TANYA HOLLANDER, a/k/a "Tania Hollander," the defendant, using the 1627 Number, sent a text message to CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, from the 3390 Number. In the text message, HOLLANDER wrote: "[An Emperors Club client ("Client-8")] would like to fly falana out to las vegas on fri. do you thnk that is an ok first appt for her?" (Call 2081C).

71. On February 11, 2008, at approximately 9:28 p.m., CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, using the 3390 Number, received a call from a representative of Client-8. During the call, the representative, who said he was calling on behalf of Client-8, asked if "Falana" would be available for Friday night. SUWAL informed the representative that Client-8 would have to pay a deposit to the Emperors Club to secure "Falana's" transportation to Las Vegas. SUWAL and the representative discussed Client-8 sending a wire transfer to pay for the deposit. (Call 3692C).

72. Notwithstanding the foregoing calls, on February 12, 2008, at 9:58 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, spoke with Client-8's representative. LEWIS told the representative that "Falana" would not be available for the appointment with Client-8. (Call 9550R).

b. February 13, 2008, Interstate Transportation  
From New York To Washington, D.C.

73. On February 11, 2008, at approximately 10:53 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, sent a text message to CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, at the 3390 Number. In the text message, LEWIS wrote: "Pls let me know if [Client-9's] 'package' (believed to be a reference to a deposit of money sent by mail) arrives 2mrw. Appt wd b on Wed." (Call 3728C). SUWAL sent a text message back to LEWIS, stating: "K." (Call 3731C).

74. On February 12, 2008, at approximately 2:37 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called a prostitute who the Emperors Club marketed

using the name "Kristen." During the call, LEWIS left a message for "Kristen" that the "deposit" had not arrived today, but that they should be able to do the trip if the deposit arrived tomorrow. (Call 9324R). At approximately 4:03 p.m., LEWIS received a call from "Kristen." During the call, "Kristen" said that she had heard the message, and that was fine. LEWIS and "Kristen" then discussed the time that "Kristen" would take the train from New York to Washington, D.C. LEWIS told "Kristen" that there was a 5:39 p.m. train that arrived at 9:00 p.m., and that "Kristen" would be taking the train out of Penn Station. LEWIS confirmed that Client-9 would be paying for everything - train tickets, cab fare from the hotel and back, mini bar or room service, travel time, and hotel. LEWIS said that they would probably not know until 3 p.m. if the deposit arrived because Client-9 would not do traditional wire transferring. (Call 9362).

75. At approximately 8:12 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from Client-9. During the call, LEWIS told Client-9 that the "package" did not arrive today. LEWIS asked Client-9 if there was a return address on the envelope, and Client-9 said no. LEWIS asked: "You had QAT . . .," and Client-9 said: "Yup, same as in the past, no question about it." LEWIS asked Client-9 what time he was interested in having the appointment tomorrow. Client-9 told her 9:00 p.m. or 10:00 p.m. LEWIS told Client-9 to call her back in five minutes. (Call 9460R).

76. At approximately 8:14 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called MARK BRENER, a/k/a "Michael," the defendant, at the 0937 Number. During the call, LEWIS told BRENER that Client-9 had just called about an appointment for tomorrow, and that he had around \$400 or \$500 credit. SUWAL said that she did not feel comfortable saying that Client-9 had a \$400 credit when she did not know that for a fact. SUWAL and BRENER talked in the background about whether Client-9 could proceed with the appointment without his deposit having arrived. (Call 9462R). At approximately 8:23 p.m., LEWIS called Client-9, and told him that the "office" said he could not proceed with the appointment with his available credit. After discussing ways to resolve the situation, LEWIS and Client-9 agreed to speak the following day. (Call 9467R).

77. On February 12, 2008, at approximately 9:22 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, sent a text message to "Kristen." In the text message, LEWIS wrote: "If D.C. appt. happens u will need 2 leave

NYC @ 4:45pm. Is that possible?" (Call 9515R). "Kristen" wrote back: "Yes." (Call 9516R).

78. At approximately 3:20 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from Client-9. During the call, LEWIS told Client-9 that they were still trying to determine if his deposit had arrived. Client-9 told LEWIS that he had made a reservation at the hotel, and had paid for it in his name. Client-9 said that there would be a key waiting for her, and told LEWIS that what he had on account with her covered the "transportation" (believed to be a reference to the cost of the trainfare for "Kristen" from New York to Washington, D.C.). LEWIS said that she would try to make it work. (Call 9636R). At approximately 3:24 p.m., LEWIS, using the 6587 Number, called CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, at the 3390 Number. LEWIS explained to SUWAL what Client-9 had proposed. SUWAL told LEWIS she would call her back. (Call 9642R). At approximately 3:53 p.m., MARK BRENER, a/k/a "Michael," the defendant, using the 0937 Number, called LEWIS at the 6587 Number. BRENER and LEWIS discussed the problem about Client-9's deposit. (Call 9654R). At approximately 4:18 p.m., SUWAL, using the 3390 Number, sent a text message to LEWIS at the 6587 Number, stating: "[P]ackage arrived. Pls be sure he rsvp hotel." (Call 9659R).

79. At approximately 4:21 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, called "Kristen." During the call, LEWIS told "Kristen" that the package had arrived, and that "they" (believed to be a reference to MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants) just got the mail. LEWIS told "Kristen" to get to Penn Station and call her when she picked up her tickets. (Call 9661R). At approximately 4:48 p.m., LEWIS sent a text message to "Kristen," stating: "TRAIN INFO Departing from Penn St. Arriving @ Union St. Washington, DC NYC to DC Train # 129 Dep. 5:39pm Arr. 9pm." (Call 9679R). At approximately 4:54 p.m., LEWIS sent another text message to "Kristen," stating: "TRAIN INFO Return trip DC to NYC Train #84 Dep. 2/14 8:35pm Arr. 11:57am." (Call 9683R).

80. At approximately 4:58 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received an incoming call from Client-9. During the call, LEWIS told Client-9 that his package arrived today, and Client-9 said good. LEWIS asked Client-9 what time he was expecting to have the appointment. Client-9 told LEWIS maybe 10:00 p.m. or so, and asked who it was. LEWIS said it was "Kristen," and Client-9 said

"great, okay, wonderful." LEWIS told Client-9 that she would give him a final price later, and asked Client-9 whether he could give "Kristen" "extra funds" at this appointment in order to avoid payment issues in the future. Client-9 said maybe, and that he would see if he could do that. LEWIS explained that the agency did not want a model accepting funds for a future appointment, but that she was going to make an exception that way a deposit could be made so that he would have a credit, and they would not have to "go through this" next time. Client-9 said perfect, and that he would call her regarding the room number. (Call 9686R).

81. At approximately 7:51 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from Client-9. During the call, LEWIS told Client-9 that the balance was around "26" (believed to be a reference to \$2,600), but she would give him an exact number later. LEWIS asked if when "Kristen" went to pick up the key she would have to give a name or would she be able to say that she was one of Client-9's guests for whom he left an envelope. LEWIS and Client-9 discussed how to arrange for "Kristen" to get the key to her hotel room. LEWIS said that she would prefer if "Kristen" did not have to give a name. Client-9 said that he was trying to "think this through." Client-9 repeated that his balance was "2600," and stated that maybe he would give "her," a reference to "Kristen," "3600" and have a thousand on balance. LEWIS suggested making it "1500" more. Client-9 said that would make it "4100," and said that he would look for a bank and see about it. Client-9 told LEWIS to let him go down and take care of this, and suggested that maybe he could put it [the hotel key] in an envelope with the concierge. (Call 9725R).

82. At approximately 8:47 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from Client-9. During the call, Client-9 told LEWIS to tell "Kristen" to go to the hotel and go to room 871. Client-9 told LEWIS that the door would be open. Client-9 told LEWIS that there would be a key in the room, but the door would be ajar. LEWIS asked if the hotel staff might pass by the door and close it, and Client-9 said no it was okay. Client-9 explained that the door would not be visibly open, but if someone pushed it, the door would open. LEWIS told Client-9 that his balance was \$2,721.41, and that if he wanted to do an additional "1500" or even "2000" it would be better. Client-9 said that he did not know if he could get to a machine to do that, but he would see. LEWIS said that "Kristen" would go directly to room 871. Client-9 asked LEWIS to remind him what "Kristen" looked like, and LEWIS

said that she was an American, petite, very pretty brunette, 5 feet 5 inches, and 105 pounds. Client-9 said that she should go straight to 871, and if for any reason it did not work out, she should call LEWIS. (Call 9731).

83. At approximately 9:32 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from "Kristen." During the call, "Kristen" said that she was in the room. LEWIS told "Kristen" that she would call her back when she knew when Client-9 would be there. (Call 9734R).

84. At approximately 9:36 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, received a call from "Kristen." During the call, LEWIS told "Kristen" that "he," a reference to Client-9, was at the hotel. "Kristen" told LEWIS that she just talked to him. "Kristen" said that Client-9 was coming to her. LEWIS told "Kristen" that Client-9 should be giving her "extra," and that the extra should be deposited into [REDACTED]. LEWIS told "Kristen" to text her when he arrived and LEWIS would start the four hours then, and also to let her know if he left early. (Call 9741R).

85. On February 14, 2008, at approximately 12:02 a.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, received a call from "Kristen." During the call, "Kristen" told LEWIS that "he," a reference to Client-9, had left. LEWIS asked "Kristen" what time he got there, and "Kristen" said "15 after . . . maybe 10." LEWIS asked "Kristen" how she thought the appointment went, and "Kristen" said that she thought it went very well. LEWIS asked "Kristen" how much she collected, and "Kristen" said \$4,300. "Kristen" said that she liked him, and that she did not think he was difficult. "Kristen" stated: "I don't think he's difficult. I mean it's just kind of like . . . whatever. . . I'm here for a purpose. I know what my purpose is. I am not a . . . moron, you know what I mean. So maybe that's why girls maybe think they're difficult . . . ." "Kristen" continued: "That's what it is, because you're here for a [purpose]. Let's not get it twisted - I know what I do, you know." LEWIS responded: "You look at it very uniquely, because . . . no one ever says it that way." LEWIS continued that from what she had been told "he" (believed to be a reference to Client-9) "would ask you to do things that, like, you might not think were safe - you know - I mean that . . . very basic things. . . ." "Kristen" responded: "I have a way of dealing with that . . . I'd be like listen dude, you really want the sex? . . . You know what I mean." Near the end of the call, LEWIS and "Kristen" discussed "Kristen's" departure via Amtrak, the room that Client-

9 had provided for "Kristen," and "Kristen's" share of the cash that Client-9 had provided to her. (Call 9750R).

c. March 4, 2008, Interstate Transportation From California to Chicago, Illinois

86. During February 2008, the FBI intercepted a series of telephone calls and text messages over the 6587 Number regarding an Emperors Club client ("Client-10") who requested a date in Chicago, Illinois, on March 4, 2008. As discussed below, in order to accommodate Client-10's request, TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, informed Client-10 that he would have to pay the costs of transportation for the prostitute from California to Chicago.

87. On February 22, 2008, at approximately 7:48 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, spoke with Client-10. During the call, LEWIS and Client-10 discussed the possibility of a prostitute the Emperors Club marketed under the name "Chrissy" traveling to Chicago for a date with Client-10 on March 4, 2008. LEWIS informed Client-10 that he would be responsible for the airfare for "Chrissy" to Chicago, and discussed additional expenses he would owe related to the travel. (Call 11503R).

88. On February 29, 2009, at approximately 1:41 p.m., TEMEKA RACHELLE LEWIS, a/k/a "Rachelle," the defendant, using the 6587 Number, sent a text message to CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendant, at the 3390 Number. In the text message, LEWIS stated: "CHRISSY'S FLIGHT INFO orbitz.com LAX to O'Hare United 110 Dep. 3/4 10:05 a.m. Arr. 4:05pm O'Hare to LaGuardia. United 692 Dep. 3/5 8:45pm Arr. 11:45pm \$482.98." (Call 13817R).

III. THE EMPERORS CLUB'S MONEY LAUNDERING CRIMES

89. As discussed above, MARK BRENER, a/k/a "Michael," and CECIL SUWAL, a/k/a "Katie," a/k/a "Kate," the defendants, have laundered the proceeds of the Emperors Club prostitution business primarily through two bank accounts in the names of "QAT Consulting Group, Inc." (the "First QAT Account") and "QAT International, Inc." (the "Second QAT Account") (collectively, the "QAT Accounts"). As discussed below, from in or about December 2004 through at least in or about January 2008, I believe that BRENER and SUWAL have used the QAT Accounts to launder more than \$1 million in proceeds from the Emperors Club prostitution business.