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8 Attorneys for Plaintiff
UNITED STATES OF AMERICA

9
10 UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 IN THE MATTER OF THE
EXTRADITION OF
13 BRYANT RIVERA,
14 aka "Eduardo,"
15 A Fugitive from the
Government of the United
16 Mexican States.

No. 2:23-mj-03275-duty
COMPLAINT
FOR PROVISIONAL ARREST WITH
A VIEW TOWARD EXTRADITION
(18 U.S.C. § 3184); ORDER THEREON
(UNDER SEAL)

18 TO: Honorable Charles F. Eick
United States Magistrate Judge
19 Central District of California

20 I, John J. Lulejian, being duly sworn, depose and state that I
21 am an Assistant United States Attorney for the Central District of
22 California and act for the United States in fulfilling its
23 obligations to the Government of the United Mexican States ("Mexico")
24 pursuant to the Extradition Treaty Between the United States of
25 America and the United Mexican States, U.S.-Mex., May 4, 1978, 31
26 U.S.T. 5059, as amended by the Protocol to the Extradition Treaty
27 Between the United States of America and the United Mexican States of
28 May 4, 1978, U.S.-Mex., Nov. 13, 1997, S. Treaty Doc. No. 105-46

1 (1998) (collectively, the "Treaty"), with respect to the fugitive,
2 BRYANT RIVERA, also known as "Eduardo" ("RIVERA").

3 In accordance with Title 18, United States Code, Section 3184, I
4 charge on information and belief as follows:

5 1. That Article 11 of the Treaty provides for the provisional
6 arrest and detention of alleged fugitives pending the submission of a
7 formal request for extradition and supporting documents.

8 2. That in accordance with Article 11 of the Treaty, the
9 Government of Mexico has asked the United States, through diplomatic
10 channels, for the provisional arrest of RIVERA with a view toward his
11 extradition.

12 3. That according to the information provided by the
13 Government of Mexico, RIVERA is charged with the crime of femicide,
14 in violation of Article 129 of the Penal Code for the State of Baja
15 California, Mexico.¹

16 4. That the offense was committed within the jurisdiction of
17 Mexico.

18 5. That on or about November 21, 2022, the Control Judge of
19 the Judicial Power of the State of Baja California, in Tijuana, Baja
20 California, Mexico, issued a warrant for RIVERA's arrest.

21 6. That the offense for which RIVERA's provisional arrest is
22 sought is covered by Article 2 of the Treaty.

23 7. That Mexico presents the following facts as the basis for
24 the criminal charges and arrest warrant:

25
26

27 ¹ The United States is seeking a warrant for RIVERA's
28 provisional arrest based only on one charge of femicide. The
United States understands that Mexico may add additional charges when
it submits the formal request for extradition.

1 a. On or about January 25, 2022, at approximately
2 12:17 p.m., Mexican authorities received a report about the discovery
3 of a lifeless woman's body in room 404 of Hotel Cascadas, located in
4 Tijuana, Baja California, next to the Hong Kong Gentlemen's Club (the
5 "Hong Kong bar"). Later that afternoon, authorities identified the
6 body as Ángela Carolina Acosta Flores, also known as "La Regia" (the
7 "Victim").

8 b. On or about January 26, 2022, a medical expert issued
9 a Medical Forensic Certificate of Necropsy report concluding that the
10 Victim's death was due to anoxemia caused by strangulation.

11 c. On or about January 28, 2022, the Victim's mother
12 provided a statement to Mexican authorities and related the following
13 facts:

14 i. In September 2021, the Victim began working as a
15 dancer, and on some occasions as a sex worker, at the Hong Kong bar;

16 ii. The last time she met in-person with her daughter
17 was on January 24, 2022, at approximately 8:00 p.m., when the Victim
18 left her house to go to work at the Hong Kong bar;

19 iii. At 10:12 p.m., the Victim communicated with her
20 mother by text. The Victim told her mother that she would enter room
21 404 at Hotel Cascadas with a client for thirty minutes. The Victim's
22 mother knew that her daughter would take her client to Hotel Cascadas
23 because she always went to the same hotel, because it is next to the
24 Hong Kong bar;

25 iv. At 10:45 p.m. and 11:15 p.m., the Victim's mother
26 sent messages to her daughter, but received no responses. Also, a
27 call to the Victim's telephone went unanswered.

1 v. The Victim's mother also sent a message to the
2 Victim's boyfriend, asking whether he had communicated with the
3 Victim. The Victim' boyfriend confirmed that he had not.

4 vi. When the Victim's mother went to the Hong Kong
5 bar to ask about her daughter, the bar's captain or manager told her
6 that the Victim was probably still busy;

7 vii. On January 25, 2022, at approximately 3:00 a.m.,
8 at the Victim's mother's request, the Victim's boyfriend went to the
9 Hong Kong bar to look for the Victim. The Victim's boyfriend was not
10 able to find the Victim. However, he told the Victim's mother that
11 one of the women in the bar said that she had seen the Victim with a
12 male client with a light brown complexion, an acne-scarred face, and
13 a stature of approximately 1.70 meters. The woman added that she
14 knew the Victim's client as "Bryant Rivera," and that he was a
15 "gringo";

16 viii. The Victim's mother and boyfriend then went
17 to the reception area of Hotel Cascadas seeking information, and they
18 remained there until approximately noon. Shortly after hearing an
19 ambulance arrive, they learned that the Victim had been found dead in
20 room 404;

21 ix. Using an iPhone application on a telephone
22 synchronized to her daughter's telephone, the Victim's mother learned
23 that the last location of the Victim's telephone was an address in
24 Riverside, California.

25 d. On or about February 2, 2022, the Victim's mother
26 identified the corpse as her daughter.

27
28

1 e. In furtherance of the investigation into the Victim's
2 death, the Mexican authorities interviewed E.M.C., a sex worker at
3 the Hong Kong bar, and learned the following:

4 i. E.M.C. worked as a sex worker at the Hong Kong
5 bar and knew the Victim since they both began working at the bar five
6 months before the Victim's death.

7 ii. On January 24, 2022, E.M.C. was working as a sex
8 worker at the Hong Kong bar and had arranged to meet a client named
9 "Bryant Rivera," to whom she previously provided sexual services.
10 "Bryant Rivera" told her that that he was an American who lived in
11 California. When "Bryant Rivera" picked her up at the bar, he would
12 check into the hotel under the name "Eduardo";

13 iii. E.M.C. described "Bryant Rivera" as approximately
14 27 to 30 years old, with a light brown complexion, an acne-scarred
15 face, a mole on the left side of his nose, an approximate height of
16 1.70 meters, a robust frame, and short, dark-colored hair.

17 iv. On January 24, 2022, at approximately 4:30 p.m.,
18 "Bryant Rivera" arrived at the Hong Kong bar, wearing a dark sweater
19 with a zipper in the middle of the chest, sleeves in a lower tone,
20 and black pants. On that day, his hair was shorter on the sides and
21 longer on the top. E.M.C. spent time with "Bryant Rivera" at the bar
22 and then went with him to Hotel Cascadas, where she provided him with
23 "a service." Following their liaison, both returned to the bar, and
24 E.M.C. resumed working.

25 v. At approximately 10:00 p.m., E.M.C. saw "Bryant
26 Rivera" leave the bar with the Victim, to whom she referred as "La
27 Regia."
28

1 vi. E.M.C. heard about the Victim's death the
2 following day.

3 f. Mexican authorities also interviewed F.M.C., an
4 employee of Hotel Cascadas, and learned the following:

5 i. On January 24, 2022, at approximately 7:00 p.m.,
6 F.M.C. began working a twelve-hour shift at the hotel's front desk.

7 ii. The same company owned both the Hong Kong bar and
8 Hotel Cascadas. Most of the time the hotel rooms were occupied by
9 clients with dancers from the Hong Kong bar, who worked as sex
10 workers.

11 iii. On January 24, 2022, between 7:00 p.m. and
12 8:00 p.m., a man who identified himself as "Eduardo" registered for a
13 room at the hotel until 1:00 p.m. the following day. The hotel
14 assigned the man to room 404.

15 iv. On January 25, 2022, at approximately 3:00 p.m.,
16 following his shift, F.M.C. received a telephone call from a
17 colleague who was in charge of the morning shift at Hotel Cascadas's
18 reception desk. F.M.C.'s colleague informed F.M.C. that a woman had
19 been found dead in room 404. F.M.C. told his colleague that on the
20 night before, he registered a man named "Eduardo," whom he later saw,
21 accompanied by the Victim.

22 v. F.M.C. said that he could describe and identify
23 "Eduardo" because he did not wear his mask properly. F.M.C.
24 described "Eduardo" as having a light brown complexion, regular
25 build, a height of approximately 1.70 meters, short brown hair, a
26 wide forehead, medium-sized eyes, light eyebrows, an acne-scarred
27 face, and a mole on the left side of his face at the height of his
28

1 nose near the cheek, and appearing to be approximately 30 to 35 years
2 old.

3 g. Mexican authorities also interviewed G.L.I., the
4 manager of Hotel Cascadas, who provided the following information:

5 i. On January 24, 2022, he worked past 8:00 p.m.,
6 the end of his twelve-hour shift. That night, his coworker told him
7 that a woman was looking for her daughter in room 404. They were
8 concerned because she was not answering text messages and calls.

9 G.L.I. explained to the woman that the room could not be entered, as
10 it had been rented until January 25, 2022, at 1:00 p.m.

11 ii. On January 25, 2022, at approximately 12:00 noon,
12 his coworker told him that they would enter room 404 because of the
13 woman's insistence and because the occupants were not answering
14 calls. Upon entering the room and discovering a woman lying naked in
15 the bathroom, they immediately called the authorities.

16 iii. G.L.I. reviewed the hotel security video camera
17 recordings of January 24, 2022, and stated that he recognized the man
18 accompanying the Victim, whom he knew as "La Regia." G.L.I. stated
19 that he had seen the man frequently at the Hong Kong bar
20 approximately two months earlier. G.L.I. described the man as having
21 light brown skin, a broad forehead, a height of 1.70 meters, medium
22 build, a mole on the side of the nose, and a face with indications
23 that he had had pimples.

24 iv. On or about December 22, 2022, G.L.I. identified
25 RIVERA from a photograph array presented to him by Mexican
26 authorities. A true and correct copy of the photograph of RIVERA
27 that G.L.I. identified is attached hereto as Exhibit A.

1 h. Mexican authorities obtained and reviewed Hotel
2 Cascadas's security video camera recordings from between the night of
3 January 24, 2022, and the morning of January 25, 2022, which show the
4 Victim and RIVERA arrive at the hotel and enter room 404. Based on
5 their review of the recordings, Mexican authorities prepared the
6 following chronology of events:

7 i. January 24, 2022, at 10:11 p.m.: The Victim and
8 RIVERA enter the hotel, walk through the reception area, and head to
9 the elevator;

10 ii. January 24, 2022, at 10:12 p.m.: The Victim and
11 RIVERA exit the elevator on the fourth floor. RIVERA is wearing a
12 dark shirt with a white rectangular logo on the left side of the
13 chest, and his hair is longer on the top than on the sides. Attached
14 hereto as Exhibit B is a true and correct copy of a still photograph
15 capture of RIVERA and the Victim (whose face has been redacted to
16 protect her privacy) outside of the hotel elevator;

17 iii. January 24, 2022, at 10:13 p.m.: The Victim and
18 RIVERA enter room 404;

19 iv. January 24, 2022, at 11:49 p.m.: RIVERA leaves
20 room 404 alone and walks down the stairs;

21 v. January 24, 2022, at 11:49 p.m. to January 25,
22 2022, at 11:35 a.m.: The hotel security video camera recordings do
23 not show any further entry or exit from room 404; and

24 vi. January 25, 2022, at 11:35 a.m.: Hotel personnel
25 enter room 404, where they discover the Victim's body.

26 i. U.S. Customs and Border Protection records, including
27 video surveillance recordings at the San Ysidro port of entry
28 ("POE"), reflect that on January 25, 2022, at approximately

1 12:02 a.m. (thirteen minutes after RIVERA left Hotel Cascadas),
2 RIVERA entered the United States on foot, at the San Ysidro POE.
3 Attached hereto as Exhibit C is a true and correct copy of a still
4 image captured from the San Ysidro POE video surveillance recordings,
5 which shows RIVERA, with the same hairstyle, wearing a black
6 sweatshirt with a zipper, lighter-toned sleeves, and a rectangular
7 white logo on the left side of the chest, as depicted in Exhibit B.

8 8. That Mexican authorities believe that RIVERA resides in
9 Downey, California.

10 9. That U.S. law enforcement also believes that RIVERA may be
11 found within the jurisdiction of this Court. According to the
12 United States Marshals Service:

13 a. California Department of Motor Vehicles ("DMV")
14 records reveal that, on or about November 14, 2022, the DMV issued a
15 California driver's license (No. ****4951) for RIVERA, which lists
16 his date of birth (**/**/1993), and a residential address in Downey,
17 California (the "Downey address"). That date of birth corresponds
18 with the date of birth for RIVERA provided by Mexican authorities.
19 Further, the man depicted in the driver's license photograph appears
20 to be the same person that Exhibit A depicts. Likewise, the Downey
21 address corresponds with the residential address for RIVERA provided
22 by Mexican authorities. In addition, the DMV records reveal that a
23 red 2021 Chevrolet Silverado (California License Plate No. ***22E3)
24 (the "red Silverado"), is registered to RIVERA or his father at the
25 Downey address.

26 b. Employment Development Department records also reveal
27 that RIVERA's residential address is the Downey address.

1 c. On or about June 6, 2023, a Deputy United States
2 Marshal traveled to the Downey address and observed an adult male,
3 approximately 30 years old, retrieve something from the red
4 Silverado. Shortly thereafter, the same man, who the Deputy
5 United States Marshals confirmed matched RIVERA's description and his
6 California driver's license photograph, emerged from the residence
7 with an elderly man and woman, later identified as RIVERA's father
8 and mother. On or about June 28, 2023, the above Deputy
9 United States Marshal and another federal agent saw the same man, who
10 matched RIVERA's description and California driver's license
11 photograph, walk from the red Silverado to the Downey address.

12 10. That Mexico has represented that it will submit a formal
13 request for extradition, supported by the documents specified in the
14 Treaty, within the time required under the Treaty.

15 11. I am informed and believe that Mexican authorities publicly
16 have discussed this case. See, e.g., Mark Lungariello, US citizen
17 wanted in serial murders of prostitutes in Mexico, N.Y. Post (Nov.
18 22, 2022, 4:54 PM), [https://nypost.com/2022/11/22/us-citizen-wanted-](https://nypost.com/2022/11/22/us-citizen-wanted-in-serial-murders-of-prostitutes-in-mexico/)
19 [in-serial-murders-of-prostitutes-in-mexico/](https://nypost.com/2022/11/22/us-citizen-wanted-in-serial-murders-of-prostitutes-in-mexico/) (quoting statements of
20 Baja California Attorney General Ricardo Carpio). I further am
21 informed and believe that Mexican media has published RIVERA's name
22 and photograph. See, e.g., Rosario Mosso Castro, Asesino serial de
23 mujeres, Zeta (Nov. 22, 2022),
24 <https://zetatijuana.com/2022/11/asesino-serial-de-mujeres/>
25 (publishing RIVERA's misspelled name and photograph); David
26 Gotfredson, U.S. citizen suspected in murders of 3 women in Tijuana,
27 CBS8 (Dec. 17, 2022, 7:17 AM),
28 <https://www.cbs8.com/article/news/local/us-citizen-suspected-in->

1 [murders-of-3-women/509-b2a2c321-c696-43ec-b224-6d92aaa66974](#)

2 (publishing RIVERA's photograph) Nonetheless, I do not believe that
3 Mexican authorities have announced that they officially submitted
4 their request for RIVERA's provisional arrest through diplomatic
5 channels. Thus, RIVERA is likely to flee if he learns of the
6 existence of a warrant for his arrest.

7 WHEREUPON, complainant requests that a warrant issue, based on
8 probable cause, pursuant to Title 18, United States Code, Section
9 3184, and the Treaty, for the arrest of RIVERA; and that this
10 complaint and the warrant be placed under the seal of the Court,
11 except as disclosure is needed for its execution, until such time as
12 the warrant is executed.

13
14 DATED: This 29th day of June, 2023, at Los Angeles, California.

15
16 Respectfully submitted,

17 E. MARTIN ESTRADA
18 United States Attorney

19 /s/

20

JOHN J. LULEJIAN
Assistant United States Attorney

21 Attorneys for Complainant
22 UNITED STATES OF AMERICA

23 Subscribed and sworn to before
24 me this 29th day of
25 June, 2023.

26 
27

HONORABLE CHARLES F. EICK
28 UNITED STATES MAGISTRATE JUDGE

EXHIBIT A



EXHIBIT B

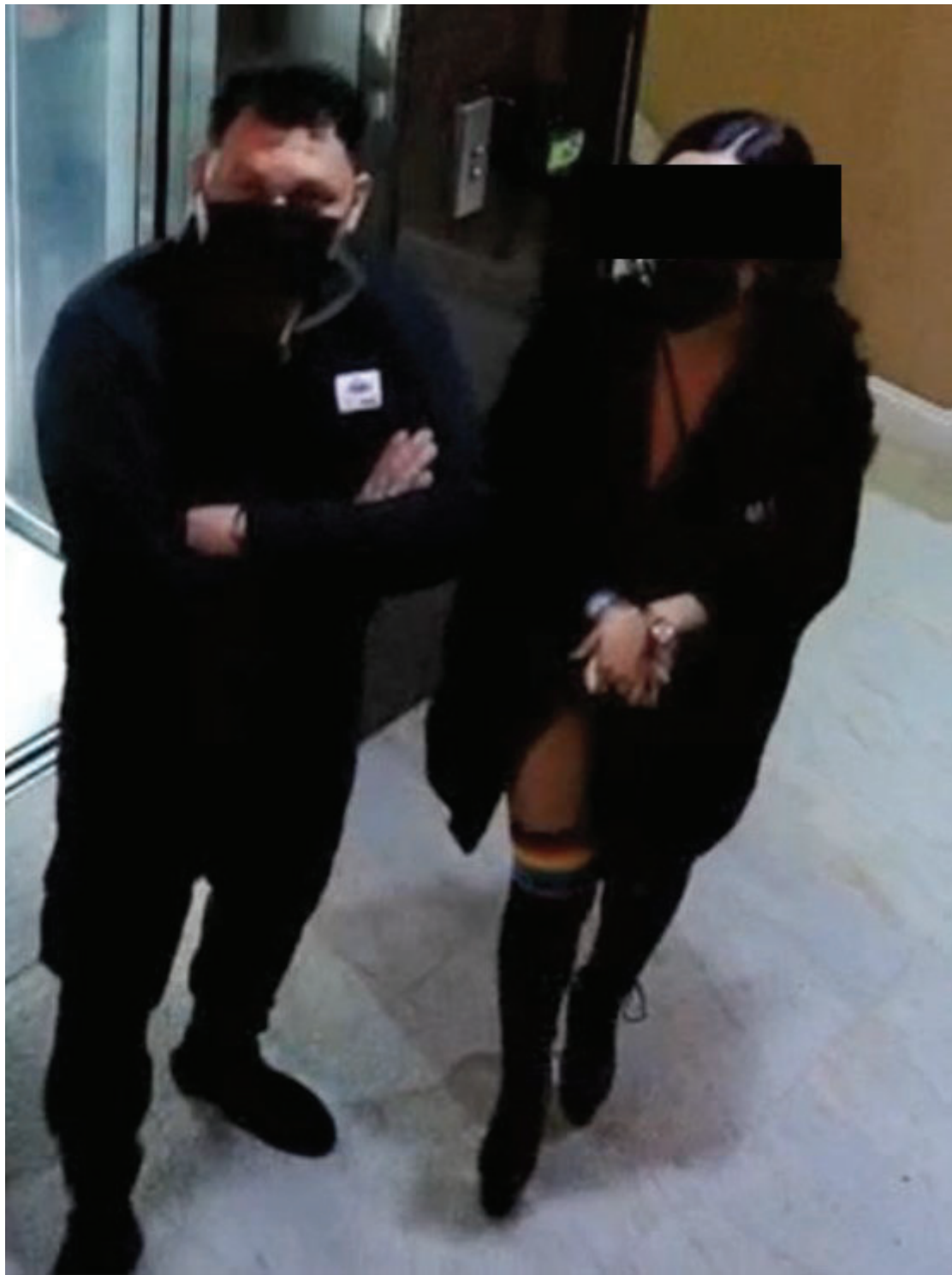


EXHIBIT C

0:02:17 1/25/2022

EP Lane 14 (23)/VCSAY01E0165

