

Approved:

*AS*  
ANDREA L. Surratt  
Assistant United States Attorney

Before:

HONORABLE MICHAEL H. DOLINGER  
United States Magistrate Judge  
Southern District of New York

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SEALED COMPLAINT

UNITED STATES OF AMERICA :

- v. - :

YONJO QUIROA,  
a/k/a "Ronaldo Solano," :

Defendant. :

Violation of  
17 U.S.C. § 506;  
18 U.S.C. §§ 2319(b)(1)  
and 2

COUNTY OF OFFENSE:  
NEW YORK

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SOUTHERN DISTRICT OF NEW YORK, ss.:

MICHAEL MANGANIELLO, being duly sworn, deposes and says that he is a Special Agent with the U.S. Department of Homeland Security, Immigration and Customs Enforcement, Office of Homeland Security Investigations ("ICE-HSI"), and charges as follows:

COUNT ONE

(Criminal Infringement of a Copyright)

1. From at least in or about February 2010, up to and including in or about January 2012, in the Southern District of New York and elsewhere, YONJO QUIROA, a/k/a "Ronaldo Solano," the defendant, willfully, and knowingly did infringe a copyright for purposes of commercial advantage and private financial gain, and by the reproduction and distribution, including by electronic means, during any 180-day period, of one and more copies and phonorecords of one and more copyrighted works, which have a total retail value of more than \$1,000, and by the distribution of a work being prepared for commercial distribution, by making it available on a computer network accessible to members of the public, when QUIROA knew and should have known that the work was intended for commercial distribution, to wit, QUIROA distributed copyright-protected sporting event telecasts and Pay-Per-View events over the Internet without the authorization of the rightful copyright owners for personal profit.

(Title 17, United States Code, Section 506;



Title 18, United States Code, Sections 2319(b)(1) and 2.)

The bases for my knowledge and the foregoing charge are, in part, as follows:

2. I am a Special Agent with ICE-HSI, and I have been involved in the investigation of this matter. The information contained in this affidavit is based upon my personal knowledge and my review of documents and records gathered during the course of this investigation, as well as information obtained, directly or indirectly, from other sources and law enforcement agents. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of the investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. In or about March 2010, ICE-HSI commenced an investigation into certain websites that were believed to be engaged in the illegal distribution of copyright-protected content by streaming over the Internet live sporting events and Pay-Per-View events. I know from my participation in the investigation that the holder of the copyrights to all television broadcasts and footage of a particular athletic event is the associated individual sports league. The sports leagues relevant to this Complaint are the National Football League (the "NFL"), the National Basketball Association (the "NBA"), the National Hockey League (the "NHL"), World Wrestling Entertainment (the "WWE") and TNA Impact Wrestling (the "TNA") (collectively, the "Leagues"). I also know that the U.S. Copyright Act, Title 17, United States Code, Sections 101, et seq., gives the holder of such copyrights various exclusive rights, including the right to control public performances and distribution of the works. In turn, the Leagues enter into contractual arrangements with television networks such as NBC and ESPN, which pay the Leagues fees for the rights to broadcast telecasts of their copyrighted sporting events.

Evidence Of Infringing Conduct of sports95.net, sports95.com, sports95.org, sports95.me, sportswwe.net, sportswwe.tv, sportswwe.com, sportswwe.ca, and hq-streams.tv

4. Based on my participation in this investigation, I have learned that from at least December 15, 2011, up to on or about January 20, 2012, seven domain names, sports95.net, sports95.com, sports95.org, sports95.me, sportswwe.net, sportswwe.tv, sportswwe.com, and hq-streams.tv all redirected to the domain name and website sports95.me. That is, when users

accessed any of these seven websites, the user was brought to the same home page, which was sports95.me. Since on or about January 23, 2012, sports95.net, sports95.com, sports95.org, sports95.me, sportswwe.net, sportswwe.tv, sportswwe.com, and hq-streams.tv have all redirected users to a different domain name and website, namely, sportswwe.ca (together, the "sports95.me and sportswwe.ca websites").

5. Based on my participation in this investigation, I know that sports95.me and sportswwe.ca are "linking" websites. Based on my training and experience, I know that "linking" websites generally collect and catalog links to files on third party websites that contain illegal copies of copyrighted content, including sporting events.<sup>1</sup> Linking websites often organize these links by, for example, sports type or sporting event, to make them easily accessible. Users simply click on a link to begin the process of downloading or streaming to their own computer an illegal broadcast of a sporting event or Pay-Per-View event from the third party website that is hosting the stream or file.<sup>2</sup> Linking websites are popular because they allow users to quickly browse content and locate illegal streams that would otherwise be more difficult to find through manual searches of the Internet. Linking websites also often allow users to post links to infringing content.

6. I have personally reviewed webpages that were available at the sports95.me and sportswwe.ca websites. Based on that review, I learned the following, among other things:

a. When a user first accessed the sports95.me or sportswwe.ca websites, that user was brought to a homepage, which had links across the top of the page for "Live sport" and "Live

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<sup>1</sup> For purposes of this affidavit, a "link" is code which specifies a particular webpage or file on the Internet. If clicked on by a user, a link can, for example, bring up the relevant web page in an Internet browser or run a program. For example, "<http://movies.nytimes.com/2010/06/18/movies/18toy.html?scp=1&sq=toy%20story%203&st=cse>" is a link to a webpage containing the New York Times' review of the movie "Toy Story 3." A "link" may also be referred to as a "Uniform Resource Locator" or "URL."

<sup>2</sup> "Streaming" refers to a particular method by which media, in particular audio and video files, are delivered to users over the Internet. For purposes of this affidavit, "streamed" media is generally live or archived content that is presented in real time and is generally available at one time only (e.g., during a sporting event).

TV," among other things. Numerous advertisements were also displayed in various locations on the homepage.

b. In addition to the links across the top of the page, the homepage also displayed a second set of links, such as "Football," "Basketball," and "NFL." By selecting one of these links, such as "Basketball," a schedule of that day's games appeared, along with links to those games, and the words "This section contains Basketball Live Streaming Video Links." The programming content listed under each link appeared to match the programming content available for that particular day or for future days. The user could then select a particular programming event, which opened in a separate window. Before the programming content loaded, advertisements were displayed in the new window. Because the content ran on a live stream from a different website that hosted the programming content, the selected show did not start at the beginning of the program, but rather started at whatever point in the stream was then live and being broadcast.

c. For example, on or about January 11, 2012, agents involved in the investigation went to the sports95.me website using a computer in Manhattan and selected a link for "NBA Indiana Pacers vs. Atlanta Hawks." As a result, a new window was opened and the live broadcast of the NBA basketball game between the Indiana Pacers and the Atlanta Hawks was streaming in this new window. Based on my conversations with representatives of the NBA, I know that as of January 11, 2012, this match was copyrighted, and the NBA did not authorize the third party distribution of that game over the Internet by the sports95.me website.

7. Other ICE-HSI agents and I accessed the sports95.me and sportswwe.ca websites using computers located in the borough of Manhattan in New York, New York, and streamed portions of copyrighted broadcasts of sporting events. More specifically, on or about the dates listed in the following chart, another ICE-HSI agent or I clicked on links for the below-listed events on the sports95.me and sportswwe.ca websites, and viewed and recorded portions of the live stream at various intervals during the event (rather than the entirety of the stream) (the "Captures"). In so doing, and based on my review of all of the Captures, it is my belief that the entire event had been made available to Internet users over the sports95.me and sportswwe.ca websites.

<u>sports95.me</u>			
Date	League	Event Viewed	Duration of Captures
January 11, 2012	NBA	Pacers vs. Hawks	06 min 59 sec 07 min 23 sec 05 min 55 sec
January 11, 2012	NBA	Nets vs. Nuggets	05 min 10 sec 05 min 14 sec 05 min 50 sec 05 min 26 sec
January 11, 2012	NHL	Penguins vs. Capitals	09 min 09 sec 06 min 00 sec 05 min 14 sec
January 12, 2012	NBA	Knicks vs. Grizzlies	06 min 15 sec 05 min 29 sec 05 min 27 sec 04 min 26 sec
January 12, 2012	NHL	Blackhawks vs. Wild	05 min 28 sec 05 min 07 sec 04 min 44 sec
January 12, 2012	NHL	Rangers vs. Senators	05 min 27 sec 05 min 04 sec 06 min 13 sec
January 12, 2012	TNA	Impact wrestling	06 min 42 sec 07 min 16 sec 06 min 14 sec
January 17, 2012	NBA	Suns vs. Bulls	05 min 28 sec 05 min 47 sec 05 min 04 sec 05 min 19 sec
January 17, 2012	NBA	Spurs vs. Heat	09 min 20 sec 05 min 59 sec 05 min 27 sec 05 min 08 sec
January 17, 2012	NHL	Red Wings vs. Stars	06 min 01 sec 04 min 37 sec 05 min 13 sec
January 17, 2012	NHL	Islanders vs. Capitals	05 min 56 sec 03 min 03 sec 06 min 03 sec

<u>sportswwe.ca</u>			
Date	League	Event Viewed	Duration of Captures
January 23, 2012	NBA	Wizards vs. 76ers	06 min 11 sec 05 min 28 sec 05 min 30 sec

			04 min 18 sec
January 23, 2012	NBA	Magic vs. Celtics	06 min 27 sec 05 min 49 sec 05 min 58 sec 06 min 03 sec
January 23, 2012	NHL	Jets vs. Hurricanes	06 min 26 sec 06 min 36 sec 06 min 29 sec
January 23, 2012	NHL	Blue Jackets vs. Predators	06 min 16 sec 05 min 38 sec 07 min 08 sec
January 23, 2012	WWE	Monday Night Raw	06 min 36 sec 06 min 28 sec 06 min 12 sec 06 min 58 sec
January 24, 2012	NBA	Knicks vs. Bobcats	06 min 27 sec 06 min 11 sec 06 min 41 sec 06 min 36 sec
January 24, 2012	NHL	Rangers vs. Jets	06 min 47 sec 06 min 27 sec 06 min 36 sec

8. Based on my conversations with representatives of the NBA, NHL, WWE, and TNA, I know that as of the date of the Captures, all of the aforementioned events were copyrighted, and the copyright holders did not authorize their third party distribution over the Internet by the sports95.me and sportswwe.ca websites.

Evidence Of Infringing Conduct of youwwe.net and youwwe.com

9. Based on my participation in this investigation, I know that youwwe.net is a "linking" website dedicated to wrestling that provides streaming wrestling events and Pay-Per-View events that were previously aired. Another domain name, youwwe.com, redirects users to the domain name and website youwwe.net (together referred to hereinafter as "youwwe.net").

10. I have personally reviewed the various webpages that were available at the youwwe.net website. Based on that review, I learned the following, among other things:

a. On the youwwe.net homepage, there were links for "Channel 1" through "Channel 5." When a user selected one of these links, such as "Channel 1," an embedded video player loaded on the screen and streamed a previously-aired WWE or TNA wrestling match. Before the programming content loaded,

advertisements were displayed in the new window. Because the content ran on a stream from a different website that hosts the programming content, the selected show did not start at the beginning of the program, but rather started at whatever point in the stream was then being broadcast.

b. For example, on or about January 10, 2012, when agents involved in the investigation selected the link for "Channel 1," the agents were taken to a stream of a certain previously broadcasted WWE wrestling event. Numerous advertisements were displayed at the bottom of the video periodically as the agents viewed the streaming event. Based on my conversations with representatives of the WWE, I know that as of January 10, 2012, this wrestling event was copyrighted, and the WWE did not authorize the third party distribution this event over the Internet by youwwe.net.

11. Other ICE-HSI agents and I accessed the youwwe.net website using computers located in the borough of Manhattan in New York, New York, and streamed portions of copyrighted broadcasts of sporting events and/or Pay-Per-View events. More specifically, on or about the dates listed in the following chart, another ICE-HSI agent or I clicked on links for the below-listed events on the youwwe.net website, and viewed Captures of the stream at various intervals during the event. In so doing, and based on my review of all of the Captures, it is my belief that the entire event had been made available to Internet users.

Date	League	Event Viewed	Duration of Captures
January 12, 2012	WWE	Wrestling	07 min 02 sec 06 min 58 sec 03 min 49 sec 06 min 03 sec
January 17, 2012	WWE	Wrestling	05 min 29 sec 05 min 21 sec 05 min 21 sec 05 min 19 sec
January 18, 2012	WWE	Wrestling	07 min 03 sec 05 min 02 sec 05 min 22 sec 05 min 27 sec
January 19, 2012	WWE	Wrestling	06 min 30 sec 05 min 28 sec 05 min 21 sec 06 min 18 sec

12. Based on my conversations with representatives of the WWE, I know that as of the date of the Captures, all of the aforementioned events were copyrighted, and the copyright holders

did not authorize their third party distribution over the Internet by youwwe.net.

Evidence Of Infringing Conduct of lshp2p.eu

13. Based on my participation in this investigation, I know that lshp2p.eu is a "linking" website dedicated to the broadcast of live sporting events.

14. I have personally reviewed webpages that were available at the lshp2p.eu website. Based on that review, I learned the following, among other things:

a. When a user first accessed the lshp2p.eu website, that user was brought to a homepage, which had links across the top of the page for sports such as "Football," "Basketball," and "NFL." Numerous advertisements are displayed on the homepage. The page design, layout, fonts, and color scheme on lshp2p.eu were very similar to those on the sports95.me and sportswwe.ca websites.

b. By selecting one of these links, such as "Basketball," a schedule of that day's games appeared, along with links to those games, and the words "This section contains Basketball Live Streaming Video Links." The programming content listed under each link appeared to match the programming content available for that particular day or for future days. The user could then select a particular programming event, which opened in a new window with an embedded video player. Before the programming content loaded, advertisements were displayed in the new window. Because the content ran on a live stream from a different website that hosted the programming content, the selected show did not start at the beginning of the program, but rather ran from whatever point in the stream the show was at in that particular moment in time.

c. For example, on or about January 23, 2012, agents involved in the investigation selected a link for "Washington at Philadelphia." As a result, a new window was opened and the live broadcast of the NBA game between the Washington Wizards and the Philadelphia 76ers was streaming in an embedded video player in this new window. Based on my conversations with representatives of the NBA, I know that as of January 23, 2012, this match was copyrighted, and the NBA did not authorize the third party distribution of that game match over the Internet by lshp2p.eu.

15. Other ICE-HSI agents and I accessed the lshp2p.eu website using computers located in the borough of Manhattan in



New York, New York, and streamed portions of copyrighted broadcasts of sporting events. More specifically, on or about the dates listed in the following chart, another ICE-HSI agent or I clicked on links for the below-listed events on the lshp2p.eu website, and viewed and recorded Captures of the stream at various intervals during the event. In so doing, and based on my review of all of the Captures, it is my belief that the entire event had been made available to Internet users.

Date	League	Event Viewed	Duration of Captures
January 23, 2012	NBA	Wizards vs. 76ers	06 min 38 sec 05 min 58 sec 05 min 28 sec 05 min 58 sec
January 23, 2012	NBA	Magic vs. Celtics	06 min 26 sec 05 min 43 sec 06 min 03 sec 06 min 56 sec
January 23, 2012	NHL	Jets vs. Hurricanes	06 min 25 sec 04 min 29 sec 06 min 08 sec
January 23, 2012	NHL	Blue Jackets vs. Predators	06 min 27 sec 06 min 03 sec 06 min 58 sec
January 23, 2012	WWE	Monday Night Raw	06 min 35 sec 06 min 46 sec 06 min 35 sec 07 min 09 sec
January 24, 2012	NBA	Knicks vs. Bobcats	06 min 39 sec 06 min 27 sec 06 min 06 sec 06 min 41 sec
January 24, 2012	NBA	Cavaliers vs. Heat	06 min 08 sec 06 min 18 sec
January 24, 2012	NHL	Islanders vs. Maple Leafs	06 min 11 sec 05 min 37 sec 06 min 47 sec
January 24, 2012	NHL	Rangers vs. Jets	06 min 27 sec 06 min 12 sec 06 min 17 sec

16. Based on my conversations with representatives of the NBA, NHL, and WWE, I know that as of the date of the Captures, all of the aforementioned events were copyrighted, and that the copyright holders did not authorize their third party distribution over the Internet by lshp2p.eu.

Evidence That YONJO QUIROA a/k/a "Ronaldo Solano," Operated and Profited From the sports95.me and sportswwe.ca websites, youwwe.net, and lshp2p.eu

17. Based on my involvement in this investigation, I believe that from at least in or about February 2010, up to and including at least in or about January 2012, YONJO QUIROA, the defendant, a/k/a "Ronaldo Solano," operated the sports95.me and sportswwe.ca websites, youwwe.net, and lshp2p.eu and, in doing so, received profits in excess of \$10,000 from online merchants who advertised on those websites.

18. Based on my training and experience, I know that a domain name is a simple, easy-to-remember way for humans to identify computers on the Internet. For example, "www.usdoj.gov" and "www.yahoo.com" are domain names. If an individual or business wants to purchase a domain name, they buy it through a "registrar." The individual or business who purchases, or registers, a domain name is called a "registrant."

19. Based on my training and experience, as well as my involvement in this investigation, I know that GoDaddy.com and Enom, Inc., are domain name registrar and web hosting companies that offers domain names for purchase, or registration, for an annual fee, and also host websites to which domain names direct users.

20. From reviewing publicly-available information about website registration and domain names, I know that "Yonjo Quiroa" is the registrant of websites "sports95.me," "sports95.org," "sports95.net," "sports95.org," "hq-streams.tv," "sprotswwe.net," "sportswwe.com," "sportswwe.ca," "youwwe.com," "youwwe.net," and "lshp2p.eu":

a. On or about October 5, 2011, an individual providing the name "Yonjo Quiroa," a residential address in Holland, Michigan ("Holland-Address"), a particular phone number ("Phone-Number-1"), and email address "yonjo51@yahoo.com" ("Email-Address-1") registered the "sports95.me," "sports95.org," "sports95.net," and "sports95.com" domain names through GoDaddy.com.

b. On or about February 8, 2011 an individual providing the name "Yonjo Quiroa," a residential address in Grand Rapids, Michigan ("Grand-Rapids-Address-1"), a particular phone number ("Phone-Number-2") and Email-Address-1, registered the "hq-streams.tv" domain name through Enom, Inc.

c. On or about February 17, 2011, an individual

providing the name "Yonjo Quiroa," the Holland-Address, Phone-Number-1, and Email-Address-1, registered the "sportswe.net" domain name through GoDaddy.com.

d. On or about August 10, 2010, an individual providing the name "Yonjo Quiroa," another residential address in Grand Rapids, Michigan ("Grand-Rapids-Address-2"), Phone-Number-1, and email address "yonjos@yahoo.com" ("Email-Address-2"), registered the "sportswe.com" domain name through GoDaddy.com.

e. On or about February 16, 2010, an individual providing the name "Yonjo Quiroa," Grand-Rapids-Address-1, Phone-Number-2, and Email-Address-1, registered the "youwwe.com" domain name through GoDaddy.com.

f. On or about July 11, 2011, an individual providing the name "Yonjo Quiroa," the same street name and number as Holland-Address, Phone-Number-1, and Email-Address-1, registered the "youwwe.net" domain name through Enom, Inc.

g. An individual providing the name "Yonjo Quiroa," the Holland-Address, and Email-Address-1 registered the "lshp2p.eu" domain name through GoDaddy.com.

21. From reviewing documents from GoDaddy.com, I learned the following, among other things:

a. "Yonjo Quiroa" has registered a total of 21 domain names using GoDaddy.com, including the forgoing. To become a GoDaddy.com customer, users must first sign up for a GoDaddy.com account. When a user signs up for such an account, the user must provide certain information. At the time of registration with GoDaddy.com, "Yonjo Quiroa" provided the Holland-Address, Phone-Number-1, and Email-Address-1. According to GoDaddy.com records, "Yonjo Quiroa" has used two Visa credit cards ("Visa-1" and "Visa-2") as well as a PayPal account (the "PayPal Account") to pay for the registration of certain domain names.

b. "Yonjo Quiroa" registered the domain name lshp2p.eu using GoDaddy.com on February 17, 2011.

22. From reviewing documents from Visa, I know that both Visa-1 and Visa-2 are WalMart money cards, which are prepaid cards onto which a user can have money loaded. Visa-2 is registered to a male individual ("Individual-1") with a secondary account name of "Yonjo Quiroa." Visa-1 is registered to a female individual ("Individual-2") at the same street address as the Holland-Address, but a different apartment number. Visa-1 was

used on or about October 29, 2011, to make a withdrawal from an ATM in Grand Rapids, Michigan. Surveillance video captured the vehicle in which the user of Visa-1 arrived at the ATM.

23. From reviewing documents from PayPal, I know that another Visa credit card ("Visa-3") is listed as the credit card associated with the PayPal Account. Visa-3 was issued by JP Morgan Chase Bank. From reviewing documents from JP Morgan Chase Bank, I know that the individual who opened the bank account associated with Visa-3 provided a Guatemalan passport in the name of "Yonjo Abisay Quiroa Solano" and a Michigan driver's license in the name of "Yonjo Abisay-Quiroa Solano," both of which include photograph. JP Morgan Chase has provided me with copies of these documents.

24. The sports95.me website has a "Terms of Service" link, which lists contact information in the form of email address "sportswwe@yahoo.com" and a particular phone number ("Phone-Number-3").

a. From reviewing documents from Sprint, I know that Phone-Number-3 was registered to "Youjo Quiroa" at another residential address in Grand Rapids, Michigan ("Grand-Rapids-Address-3").

25. From reviewing documents obtained from Yahoo, which operates the Yahoo e-mail system, I know the following, among other things:

a. Email address "sportswwe@yahoo.com" is registered to "Yonjo Quiroa."

b. Email address "sportswwe@yahoo.com" was accessed from a certain IP address ("IP-Address-1") multiple times between December 7, 2011 and December 12, 2011. Based on my training and experience, I know that the individual accessing an email account is typically the person who created and uses that particular e-mail address.

26. Comcast provides Internet service and is the owner of IP-Address-1 from which "sportswwe@yahoo.com" was accessed. From reviewing documents obtained from Comcast, I know that the name and physical address associated with the IP address at the dates and times of six of the log-ins between December 7, 2011 and December 12, 2011 was Individual-2 with a residential address in Comstock Park, MI ("Comstock-Park-Address"). Comcast also listed a previous address for Individual-2 at Grand-Rapids-Address-3, where "Youjo Quiroa" had a registered phone number that appears on the sports95.me website.

27. On or about January 4, 2012, surveillance was conducted at the Comstock-Park-Address. HSI agents observed the white Honda from the JP Morgan ATM at which Visa-1 was used in the parking lot of the Comstock-Park-Address. Agents were able to identify the white Honda because of multiple distinguishing markings on the vehicle that were visible in the ATM surveillance video. Subsequent records checks revealed that the vehicle is registered to "Aja Quiroa."

28. Based on my training and experience, as well as my participation in this investigation, I know that individuals who register and operate websites such as the sports95.me and sportswwe.ca websites, lshp2p.eu, and youwwe.net often profit from revenue generated by advertisements placed on their websites. Generally speaking, online merchants that sell products or services contract to pay individuals who host, or publish, those merchants' advertisements on their websites. That payment is generally based on the number of clicks on a particular advertisement, the number of times an advertisement is viewed by a visitor to the website, or some other quantifiable act. An "ad broker," which brings these online merchants and publishers together, tracks and records the Internet traffic to a merchant's advertisement on a particular publisher's website, and subsequently pays the operator of that website a negotiated commission on behalf of the merchant. I know that Google AdSense is a popular Internet ad broker. When customers register with Google AdSense, they must provide certain information, such as their name and address. Customers must also provide the URL of the website for which they seek to earn revenue.

29. From reviewing documents obtained from Google AdSense, I know the following, among other things:

a. Individual-2 has a Google AdSense account. When Individual-2 signed up for Google AdSense, she provided her name and the Holland-Address.

b. Website lshp2p.eu is listed as the website for which Individual-2 receives advertising revenue from Google AdSense.

c. Between June 17, 2011 and December 23, 2011, Visa-2 was credited 7 times by Google AdSense for a total of \$13,256.62. These payments to Visa-2 were authorized by Individual-2.

30. I know that Facebook is a social networking website on which users can post information about themselves, converse with other Facebook users using the Facebook "wall," and

upload photographs, including a "profile picture" that is displayed on the Facebook user's profile page. Facebook users can add other Facebook users as "friends," which I know generally means that the two Facebook users know one another or have an interest in viewing one another's Facebook page. From viewing publicly-available Facebook pages on or about January 27, 2012, I know the following:

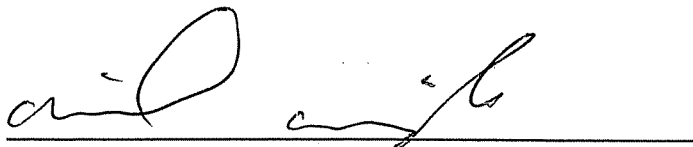
a. The Facebook page of Facebook user "Ronaldo Solano" displays a profile picture which is an image of a man and a woman. I know from viewing a Michigan driver's license photograph of "Yonjo Abisay-Quiroa Solano," that the man in "Ronaldo Solano's" Facebook profile picture is the same person as "Yonjo Abisay-Quiroa Solano." "Ronaldo Solano's" Facebook page also lists certain things in which "Ronaldo Solano" is interested, including "WWE Monday Night Raw" and "WWE SmackDown" and another Facebook page called "Sportswwe."

b. The "Sportswwe" Facebook page lists website "sports95.me" under the page's "Basic Information." A post on the "wall" of the "Sportswwe" Facebook page invites Facebook users to "Watch live sports @ "http://www.sports95.me/."

c. According to "Ronaldo Solano's" Facebook page, he is Facebook friends with Facebook user "Yonjo Quiroa." The Facebook page of "Yonjo Quiroa" displays as a profile picture a graphic, rather than a photograph of any individual. The graphic advertises, among other things, the "www.sportswwe.com" website. In addition, "Yonjo Quiroa" had made posts to his Facebook "wall" inviting Facebook users to watch live sports on "www.sports95.me." and "sportswwe.tv." "Yonjo Quiroa" indicated on his Facebook page that he is interested in the "Sportswwe" Facebook page.


31. On or about September 30, 2011, an employee of WWE emailed "yonjos@yahoo.com" and "yonjo51@yahoo.com" relaying information that sportswwe.net, sportswwe.org, youwwe.com, youwwe.net, and other websites were infringing on WWE's copyrights. On or about October 1, 2011, email address "yonjos@yahoo.com," which is associated with "Yonjo Solano," replied and offered to sell his domain names to WWE. On or about January 27, 2012, an ICE agent posing as a representative of WWE offered to purchase the domain names from "Yonjo Solano." On or about January 27, 2012, email address "yonjo51@yahoo.com," which is associated with "yonjo a quiroa," offered to "make a deal."

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of YONJO QUIROA, a/k/a "Ronaldo Solano," the defendant, and that he be arrested and imprisoned, or bailed, as the case may be.



MICHAEL MANGANIELLO  
Special Agent  
U.S. Department of Homeland Security  
Immigration and Customs Enforcement  
Office of Homeland Security  
Investigations

Sworn to before me this  
27th day of January, 2012



HONORABLE MICHAEL H. DOLINGER  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK