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CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,

v.

YONG JUN KANG,  
a/k/a "James,"  
a/k/a "Jimmy,"  
KESHENG ZHU,  
a/k/a "Michael,"  
a/k/a "Mufasa,"  
RUJING JIANG,  
a/k/a "Do Do,"  
ZHENHUA LIU,  
a/k/a "Jo Jo,"  
LIANCHENG NING,  
a/k/a "Lao Li,"  
a/k/a "Lao Shan,"  
PENGQUAN XIE,  
a/k/a "Lee,"  
ZHENG QU,  
a/k/a "John," and  
THONGYOT LIAMURAI,  
a/k/a "Laura,"

Defendants.

CASE NO. 06-4184  
CRIMINAL COMPLAINT

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1 100000 000 0000 110001 0000 0 0000  
06-MJ-00418-CMP

BEFORE James P. Donohue, United States Magistrate Judge, Seattle, Washington.

The undersigned complainant, being duly sworn, alleges:

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**COUNT 1**

**(Conspiracy to Transport Individuals in Furtherance of Prostitution)**

Beginning in or before 2004, and continuing through and including August 10, 2006, in the Western District of Washington, and elsewhere, YONG JUN KANG, a/k/a "James," a/k/a "Jimmy," KESHENG ZHU, a/k/a "Michael," a/k/a "Mufasa" RUJING JIANG, a/k/a "Do Do," ZHENHUA LIU, a/k/a "Jo Jo," LIANCHENG NING, a/k/a "Lao Li," a/k/a "Lao Shan," PENGQUAN XIE, a/k/a "Lee," ZHENG QU, a/k/a "John," THONGYOT LIAMURAI, a/k/a "Laura," and other persons known and unknown, knowingly and intentionally did conspire to:

- a. Transport individuals in interstate and foreign commerce, with intent that such individuals engage in prostitution and in sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2421;
- b. Persuade, induce, entice, and coerce individuals to travel in interstate and foreign commerce, to engage in prostitution and in sexual activity for which a person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422(a); and
- c. Travel in interstate and foreign commerce, and use facilities in interstate and foreign commerce, that is, the interstate telephone wires, with intent to distribute the proceeds of unlawful activity, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on, of unlawful activity, said unlawful activity being interstate prostitution offenses in violation of Title 18, United States Code, Sections 2421 and 2422(a), and thereafter did perform and attempt to perform acts to distribute the proceeds of the unlawful activity, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on, of the unlawful activity, in violation of Title 18, United States Code, Section 1952.

1 **A. Object of the Conspiracy**

2 An object of the conspiracy was to make substantial sums of money through the  
3 recruitment and exploitation of young Asian women as part of an international and  
4 interstate prostitution ring.

5 **B. Manner and Means of the Conspiracy**

6 1. It was part of the conspiracy that members of the conspiracy arranged for the  
7 transportation of young Asian females from Asian countries to the United States, for the  
8 purpose of prostitution.

9 2. It was further part of the conspiracy that the defendants and other  
10 coconspirators arranged for the transportation, exchange, and rotation of the young Asian  
11 females to engage in prostitution at brothels and escort services located throughout the  
12 United States, including in Seattle, Washington.

13 3. It was further part of the conspiracy that YONG JUN KANG operated a  
14 brothel in Seattle, which was most recently located at 4411 11th Avenue South, Seattle.

15 4. It was further part of the conspiracy that PENGQUAN XIE and ZHENG QU  
16 assisted KANG in operating his brothel by, among other things, working as brothel managers.

17 5. It was further part of the conspiracy that ZHENHUA LIU operated a brothel  
18 in Seattle, which was most recently located at 5403 Columbia Drive South, Seattle.

19 6. It was further part of the conspiracy that LIANCHENG NING assisted Kang  
20 and Liu in operating their brothels by, among other things, transporting prostitutes  
21 between the brothels and Sea-Tac Airport, and transporting customers to the brothels.

22 7. It was further part of the conspiracy that KESHENG ZHU and RUJING  
23 JIANG operated an escort service in Seattle, which was based at their residence located at  
24 3211 S. Oihello Street, Seattle.

25 8. It was further part of the conspiracy that THONGYOT LIAMURAI worked  
26 as a prostitute for ZHU and JIANG. LIAMURAI also worked as the manager of  
27 KANG's brothel, and was otherwise a close confidant of KANG.

28

1 **C. Overt Acts in Furtherance of the Conspiracy.**

2 During and in furtherance of the conspiracy, one or more of the conspirators  
3 committed one or more of the following overt acts, among other overt acts:

- 4 1. On or about the dates set forth below in this Complaint, YONG JUN  
5 KANG facilitated the interstate transportation of Asian women who worked  
6 as prostitutes at his brothel, by transporting the women between the brothel  
7 and Sea-Tac Airport.
- 8 2. On or about the dates set forth below in this Complaint, ZHENHUA LIU  
9 facilitated the interstate transportation of Asian women who worked as  
10 prostitutes at his brothel, by transporting the women between the brothel  
11 and Sea-Tac Airport, and by directing LIANCHENG NING to transport the  
12 women between the brothel and the airport.
- 13 3. On or about the dates set forth below in this Complaint, KESHING ZHU  
14 and RUJING JIANG arranged for and facilitated the interstate  
15 transportation of Asian women who worked as prostitutes at their escort  
16 service by, among other things, transporting the women between their  
17 residence and Sea-Tac Airport.
- 18 4. On or about the dates set forth below in this Complaint, LIANCHENG  
19 NING facilitated the interstate transportation of Asian women who worked  
20 as prostitutes at KANG's and LIU's brothels, by transporting the women  
21 between the brothels and Sea-Tac Airport.
- 22 5. In or about January 2006, PENGQUAN XIE traveled from Los Angeles,  
23 California, to Seattle, Washington, for the purpose of working as the  
24 manager at KANG's brothel. Thereafter, between mid-January 2006, and  
25 July 15, 2006, XIE managed KANG's brothel on a daily basis.
- 26 6. On or about July 22, 2006, ZHENG QU traveled from Los Angeles,  
27 California, to Seattle, Washington, for the purpose of working as the  
28 manager at KANG's brothel. Thereafter, QU managed KANG's brothel on  
a daily basis.
7. On or about June 15, 2006, THONGYOT LIAMURAI traveled from Los  
Angeles, California, to Seattle, Washington, for the purpose of working as a  
prostitute at ZHU's and JIANG's escort service.
8. On or about July 19, 2006, THONGYOT LIAMURAI traveled from Los  
Angeles, California, to Seattle, Washington, for the purpose of working as  
the manager at KANG's brothel. Thereafter, LIAMURAI managed  
KANG's brothel for several days. On or about July 27, 2006, LIAMURAI  
began working again as a prostitute at ZHU's and JIANG's escort service.

All in violation of Title 18, United States Code, Section 371.

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**COUNT 2**

**(Conspiracy to Transport and Harbor Illegal Aliens)**

Beginning in or before 2004, and continuing through and including August 10, 2006, in the Western District of Washington, and elsewhere, YONG JUN KANG, a/k/a "James," a/k/a "Jimmy," KESHENG ZHU, a/k/a "Michael," a/k/a "Mufasa" RUJING JIANG, a/k/a "Do Do," ZHENHUA LIU, a/k/a "Jo Jo," LIANCHENG NING, a/k/a "Lao Li," a/k/a "Lao Shan," PENGQUAN XIE, a/k/a "Lee," ZHENG QU, a/k/a "John," THONGYOT LIAMURAI, a/k/a "Laura," and other persons known and unknown, knowing and in reckless disregard of the fact that aliens had come to, entered, and remained in the United States in violation of law, did conspire to:

- a. Transport and move such aliens within the United States by means of transportation and otherwise, in furtherance of the violation of law; and
- b. Conceal, harbor, and shield from detection such aliens in a place, building, and by means of transportation.

The Complaint further alleges that the defendants committed this offense for the purpose of commercial advantage and private gain.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(iii), 1324 (a)(1)(A)(v)(I), and 1324(a)(1)(B)(i).

**COUNT 3**

**(Conspiracy to Engage in Money Laundering)**

Beginning in or before 2004, and continuing through and including August 10, 2006, in the Western District of Washington and elsewhere, YONG JUN KANG, a/k/a "James," a/k/a "Jimmy," KESHENG ZHU, a/k/a "Michael," a/k/a "Mufasa," RUJING JIANG, a/k/a "Do Do," ZHENHUA LIU, a/k/a "Jo Jo," and other persons known and unknown, knowingly and intentionally did conspire to:

- a. Transport and transfer funds from a place in the United States to a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, namely, Transportation in Furtherance of

1 Prostitution, in violation of Title 18, United States Code, Sections 2421 and  
2 2422, and Transportation and Harboring of Illegal Aliens, in violation of  
3 Title 8, United States Code, Section 1324; and

- 4 b. Transport and transfer funds from a place in the United States to a place  
5 outside the United States, knowing that the funds involved in the  
6 transportation and transfer represented the proceeds of some form of  
7 unlawful activity, and knowing that such transportation and transfer was  
8 designed in whole or in part to conceal and disguise the nature, location,  
9 source, ownership, and control of the proceeds of specified unlawful  
10 activity, namely, Transportation in Furtherance of Prostitution, in violation  
11 of Title 18, United States Code, Sections 2421 and 2422, and  
12 Transportation and Harboring of Illegal Aliens, in violation of Title 8,  
13 United States Code, Section 1324.

14 All in violation of Title 18, United States Code, Sections 1956(a)(2)(A),  
15 1956(a)(2)(B)(i), and 1956(h).

16 The complainant further states:

17 **I. AFFIANT'S TRAINING AND EXPERIENCE**

18 David Hecht, Special Agent, U.S. Department of Justice, Federal Bureau of  
19 Investigation (FBI), being duly sworn under oath states as follows:

20 I am an "investigative or law enforcement officer" within the meaning of Title 18,  
21 United States Code, Section 2510(7), that is, an officer of the United States who is  
22 empowered by law to conduct investigations of, and to make arrests for, offenses  
23 enumerated in Title 18, United States Code, Section 2516. I have been a Special Agent of  
24 the FBI for nine and one-half years. I am currently assigned in Seattle, Washington, and  
25 have been so assigned for the past nine years. In connection with my official duties, I  
26 investigate criminal violations of Titles 8, 18 and 21 of the United States Code. During  
27 the past five years, I have investigated Organized Crime cases, including Asian Organized  
28 Crime groups. I am familiar with and have participated in all of the usual methods of

1 investigation, including, but not limited to, visual surveillance, the questioning of  
2 witnesses, the use of informants, the use of pen registers, search warrants, and undercover  
3 operations. I have participated in and administered court authorized electronic  
4 monitoring, commonly referred to as Title III interceptions.

5 During 2000 through 2003, I was a case agent assigned to an FBI Seattle  
6 investigation of an international Asian prostitution ring and human trafficking  
7 organization. The investigation was named "Operation Syclops." During Operation  
8 Syclops, I became very familiar with the nature of prostitution/human trafficking  
9 organizations. General characteristics of these types of criminal enterprises are described  
10 elsewhere in this affidavit. Operation Syclops began with our identification of one  
11 brothel in Seattle. After further investigation, it became apparent that this brothel was  
12 part of a nationwide network of brothels in cities throughout the United States. Women  
13 working as prostitutes traveled between the brothels regularly. As part of Operation  
14 Syclops, the FBI received court authorization to wiretap four telephones being used by  
15 brothel operators and brokers, who arranged for prostitutes to travel from brothel to  
16 brothel in various cities. The wiretaps revealed the nature and extent of this national  
17 network. At the conclusion of the investigation, eight defendants were charged and  
18 convicted in the Western District of Washington (WDWA). These defendants operated a  
19 total of three brothels in Seattle, one brothel in Portland, and one brothel in San  
20 Francisco. In addition, a major national broker who lived in Los Angeles was charged  
21 and convicted in the WDWA. Other FBI offices conducted follow-up investigations  
22 based on the intelligence we gathered in Operation Syclops, including a spin-off wiretap  
23 investigation in Atlantic City, New Jersey, which resulted in numerous prosecutions and  
24 convictions of brothel operators and brokers. As part of Operation Syclops, we  
25 conducted a continuing investigation based on information provided by cooperating  
26 prostitutes from Malaysia, who were arrested as material witnesses. Based on  
27 information they provided, as well as corroborating information, a federal grand jury  
28 returned an indictment against two "agents" in Kuala Lumpur, Malaysia, who

1 spearheaded the international prostitution ring.

2 During the investigation described below, I have participated with other Special  
3 Agents of the FBI, U.S. Customs and Immigration Enforcement (ICE), and with Seattle  
4 Police Department (SPD) officers and detectives while conducting interviews, physical  
5 surveillance, background investigations, consensually monitored meetings, undercover  
6 operations, and while examining financial records, pen registers and trap/trace data, and  
7 telephone subscriber/toll records pertaining to the investigation of the offenses described  
8 above. I have spoken to other agents, law enforcement officials, and other interested  
9 individuals about this investigation, and have written and read reports concerning the  
10 progress of the investigation. As a result, I am fully familiar with all aspects of this  
11 investigation. The statements contained in this affidavit are based, in part, on information  
12 that has been provided to me directly or indirectly by Special Agents of the FBI and ICE,  
13 detectives and officers of the SPD, confidential informants, undercover detectives, and on  
14 my experience and training as a Special Agent of the FBI.

15 Since this affidavit is being submitted for the limited purpose of obtaining arrest  
16 warrants for the defendants, I have not included each and every fact known to me  
17 concerning this investigation. Throughout this affidavit, I have included parenthetical  
18 explanations to assist the reader in interpreting code words used by the target subjects to  
19 discuss the criminal activities. These parenthetical descriptions are based on my training  
20 and experience in investigating human trafficking and prostitution cases, including the  
21 instant investigation.

## 22 **II. OVERVIEW OF THE INVESTIGATION.**

23 This is a multi-jurisdictional investigation which was initiated in November 2004  
24 by the FBI, ICE, and SPD. The investigation has identified individuals who are engaged  
25 in the importation, transportation, and harboring of illegal alien Asian females for the  
26 purpose of prostitution. As described more fully below, this investigation has determined  
27 that the defendants are involved in the following criminal activities:



1 a. Yong Jun Kang operates a brothel in Seattle. Pengquan Xie worked as  
2 the manager of Kang's brothel between mid-January 2006, and mid-July 2006.

3 Thereafter, Zheng Qu began working as the manager of Kang's brothel.

4 b. Zhenhua Liu operates another brothel in Seattle.

5 c. Liancheng Ning transports prostitutes and customers for both Kang and  
6 Liu. They pay Ning to transport prostitutes between their brothels and Sea-Tac Airport,  
7 and to transport customers to and from their brothels.

8 d. Kesheng Zhu and Rujing Jiang operate a prostitution escort service in  
9 the greater Seattle area.

10 e. Thongyot Liamurai has worked as a prostitute for Zhu and Jiang, and  
11 previously worked as an agent or broker of prostitutes from Thailand. Liamurai also is a  
12 close confidante and coconspirator of Kang. She worked as Kang's brothel manager for  
13 several days in July and August 2006.

14 Each of the above-listed defendants are involved with a national and international  
15 network of brothels, escort services, and sex traffickers. Based on this investigation, the  
16 prior investigation in Operation Syclops, and other alien smuggling/prostitution  
17 investigations which have been conducted by the FBI, ICE, and other law enforcement  
18 agencies, and on my conversations with other law enforcement agents involved in similar  
19 investigations, I am familiar with the general nature and methods of operation of human  
20 trafficking and prostitution criminal enterprises. Asian females who are seeking  
21 employment in the United States are recruited and/or volunteer to move to the United  
22 States from their homelands. These women may or may not be aware that they will be  
23 engaging in prostitution upon their arrival in the United States. Their entry into the  
24 United States is often accomplished through various means of smuggling or visa fraud,  
25 including obtaining temporary tourist or student visas with the intent to overstay the  
26 allowable period. These women often incur a substantial debt (usually \$30,000 to  
27 \$50,000) to a broker/smuggler who may be located in the United States or overseas, and  
28 who facilitates and pays for all expenses associated with bringing them to the United

1 States. Upon their arrival, these women often surrender their passports and other travel  
2 documents to the broker, and are thereafter not permitted to travel freely. The women  
3 ordinarily commence work as prostitutes in a brothel located near the broker. They then  
4 travel throughout the United States working at various brothels in different cities. The  
5 women ordinarily spend no more than seven to fourteen days at one brothel before they  
6 travel to another city to work in a different brothel. Their travel is coordinated and/or  
7 monitored by the broker.

8 Brothel owners throughout the United States contact brokers, prostitutes, and other  
9 brothel owners to arrange for the exchange or rotation of the prostitutes among brothels.  
10 This contact is almost exclusively made telephonically, as the brokers and brothel owners  
11 are usually located in different cities. The brothel owners are responsible for transporting  
12 the departing/arriving prostitutes between the airport and their brothels. The prostitutes  
13 hope to satisfy their debt to the broker by providing the broker with a portion of the  
14 prostitution proceeds. The money is received by the broker either from the owners of the  
15 brothels at which the prostitute works, or from the prostitute herself. The brokers  
16 generally monitor the prostitutes' activities by maintaining (telephonic) contact with the  
17 brothel owners. When and if the prostitute's debt is satisfied, she becomes independent  
18 and free to travel on her own. Some women return to their homelands, while others  
19 choose to continue working as prostitutes and arrange their own travel and brothel  
20 assignments.

### 21 **III. THE "APPLE SPA" INVESTIGATION.**

22 In April 2004, Eastside Narcotics Task Force (ESNTF) officers received an  
23 anonymous tip, in the form of a letter, which stated that an Asian "massage parlor"  
24 located at 10244 NE 10th Street, Bellevue, Washington, had been operating as a front for  
25 acts of prostitution for approximately one year. The tip letter further stated that "Michael  
26 Zhu" and his girlfriend "Doe Doe" operated the business; that they employed prostitutes  
27 from Korea, Malaysia, and China; and that they had connections with alien smugglers in  
28 Asia which enabled them to rotate new prostitutes in and out of the business every ten

1 days. According to the letter, the operators of the spa also maintained a brothel in an  
2 unidentified rental house in the Seattle area, and they employed illegal immigrants to  
3 manage the massage parlor and the brothel. As set forth below, subsequent investigation  
4 confirmed that Kesheng "Michael" Zhu, his wife, Rujing Jiang, and Yong Jun Kang  
5 operated the "Apple Spa" as a front for prostitution.

6 After receiving the tip letter, ESNTF officers reviewed Washington State business  
7 records and discovered that Kesheng Zhu was the licensed owner of a business named  
8 "Heaven and Earth" d/b/a "Apple Spa" at 10244 NE 10th Street, Bellevue. ESNTF  
9 officers and ICE agents conducted surveillance at the Apple Spa over the next several  
10 weeks, and they observed Zhu, Jiang, and Kang at the business on multiple occasions.  
11 Among other things, surveillance agents observed Kang transporting young Asian  
12 females to and from the Apple Spa. In addition, officers observed numerous Asian males  
13 enter the business, stay inside for approximately 30 minutes, and then depart.

14 On April 20, 2004, an Undercover Officer (UCO) placed a telephone call to the  
15 Apple Spa. An Asian female answered the phone, and explained to the UCO that they  
16 charged \$60 for a 45 minute "Asian style massage." The UCO then went to the Apple  
17 Spa, posing as a customer. He was provided a massage by "Nancy" (subsequently  
18 determined to be Vicky Kin Hi Fung). Fung offered sexual services to the UCO, stating  
19 that she charged \$60 for manual manipulation and \$80 for oral sex. The UCO told Fung  
20 that he had to leave at that time, but paid her the fee anyway.

21 On April 22, 2004, another UCO visited the Apple Spa, posing as a customer. The  
22 UCO met with a prostitute, who told him she charged \$60 for manual manipulation, \$80  
23 for oral sex, and \$120 for "full sex." After the UCO exited the business, law enforcement  
24 officers executed a court-authorized search warrant at the Apple Spa. During the search  
25 of the business, there were two employees present -- Zhi Wen Wang, who was the  
26 receptionist, and Vicky Fung, one of the prostitutes. Officers discovered and seized  
27 numerous condoms hidden throughout the business, as well as used condoms in the trash.  
28 Upon entering one of the massage rooms, police officers observed Fung with her hand on

1 a customer's groin. The customer was interviewed, and admitted that he had been to the  
2 spa twice before, and that on each visit his genitals were manually manipulated by an  
3 employee. According to the customer, there were different prostitutes working during  
4 each of his visits. He stated that he paid \$60 for the massage, and an extra \$50 for the  
5 sexual services.

6 Zhi Wang, the receptionist, also was interviewed by officers. Wang admitted that  
7 she was responsible for coordinating customer appointments, greeting customers,  
8 collecting fees from the customers, introducing the customers to the prostitutes, cleaning  
9 the rooms after each "massage," and cooking food for the prostitutes. Wang further  
10 confessed that she was aware the women provided sex acts to the customers.

11 Vicky Fung also was interviewed by officers. She stated that she previously lived  
12 in Los Angeles, California, and that Rujing Jiang arranged for her to work as a prostitute  
13 at the Apple Spa. According to Fung, she supplied her own airfare to Seattle, and Jiang  
14 and Zhu transported her from the airport to the spa. Fung stated that she had an average  
15 of three to seven customers per day, and each of them involved sexual activity.  
16 According to Fung, each night an Asian male (believed to be Kang or Zhu) came to pick-  
17 up Wang, at which time he locked Fung in the building (she did not have keys). Fung had  
18 an address book which officers seized. She explained that Jiang and other persons  
19 provided her with telephone numbers for various brothels located in cities throughout the  
20 United States. The names and telephone numbers were listed in the address book.  
21 According to Fung, Jiang told her that she would work in Seattle for a couple of weeks,  
22 and then she would travel to a brothel in a different city.

23 Later that day, ESNTF officers executed a search warrant at Zhu's and Jiang's  
24 residence, located at 12010 56th Place S., Seattle. At the time of the search, Zhu, Jiang,  
25 and Kang were present at the house. Officers seized the following items during the  
26 search: Ledgers listing dates and corresponding totals of money; financial records  
27 documenting large cash deposits made by Jiang; more than \$10,000 in U.S. currency  
28 hidden in various locations throughout the house; empty and full cases of condoms

1 matching those found at the Apple Spa (each case held 1,000 condoms when full);  
2 receipts for items including lotions and oils; an Alaska Airlines receipt for Fung's flight  
3 from Los Angeles to Seattle on April 13, 2004; multiple receipts documenting wire  
4 transfers sent by Zhu and Jiang to individuals in China; a money order receipt  
5 documenting Kang's payment of \$10,000 to Jiang; a fake U.S. social security card in  
6 Jiang's name; and a .380 pistol, with ammunition and magazines. Officers also  
7 discovered numerous blank money orders in Kang's wallet.

8 Zhu was interviewed by officers after the search. Zhu stated that he employed  
9 Asian women for "massages," and that they rotated in and out of the Apple Spa  
10 approximately every two weeks. Zhu made no further admissions. Zhu was ultimately  
11 determined to be an illegal alien in the United States, and was subsequently deported to  
12 China on June 8, 2004.

13 After the search warrants, Apple Spa closed operations. No criminal charges were  
14 filed against Kang, Jiang, or Zhu. Jiang (who was pregnant with Zhu's child) and Kang  
15 both were determined to be Chinese nationals who were in the United States illegally.  
16 They subsequently failed to appear at immigration removal proceedings, and were never  
17 deported. As described below, Kang moved to Portland, Oregon, and opened a brothel  
18 there. Jiang appears to have remained in the Seattle area. Zhu illegally reentered the  
19 United States after his deportation. He is currently an illegal alien living in Seattle with  
20 Jiang and their son.

#### 21 **IV. KANG'S BROTHEL.**

##### 22 **A. Kang's Portland Brothel.**

23 In December 2004, FBI agents in Portland, Oregon learned from CI#1 that an  
24 Asian brothel was operating in Southeast Portland. As detailed below, subsequent  
25 investigation identified Yong Jun Kang as the owner and operator of the brothel. CI#1  
26 developed a relationship with Kang, and engaged Kang in several consensually recorded  
27  
28

1 conversations during which they discussed Kang's prostitution business.<sup>1</sup>

2 On December 17, 2004, CI#1 placed a consensually recorded telephone call to  
3 (503) 425-9898. This phone was (and still is) subscribed to by Kang. CI#1 asked Kang  
4 whether he had any women available. Kang asked CI#1 how he got his phone number.  
5 CI#1 stated that his friend "Bao" told him to call this number if he wanted "girls"  
6 (prostitutes). Kang stated that there were some Chinese women available. CI#1 asked  
7 where he should go to meet the women. Kang instructed CI#1 to park his car at the  
8 corner of 92nd Avenue and Holgate Street in Portland, and call back. CI#1 did not go to  
9 the brothel that day.

10 On December 21, 2004, CI#1 placed a consensually recorded telephone call to  
11 (503) 425-9898 and spoke to Kang. CI#1 asked whether there were any "girls" available.  
12

13 <sup>1</sup> CI#1 has been providing reliable information to FBI agents in Portland, Oregon since  
14 November 2004. In this investigation, CI#1 was able to obtain information regarding the  
15 operation of Kang's brothel when it was located in Portland. The information CI#1 has provided  
16 in this investigation has been corroborated with other investigative tools, including surveillance  
17 and other informant information. CI#1 also has provided information in furtherance of a  
18 narcotics investigation conducted by the Drug Enforcement Administration (DEA). To date,  
19 none of the information provided by CI#1 has proven to be false. CI#1 has cooperated with law  
20 enforcement in an effort to improve his immigration status in the United States. At the  
21 conclusion of CI#1's cooperation, the FBI has agreed to support CI#1's application for an S-5  
22 Visa which, if granted, would permit CI#1 to remain in the United States rather than being  
23 deported. In addition, as of May 31, 2006, CI#1 has received a total of \$3,000 from the FBI in  
24 exchange for the information CI#1 has provided. Of this sum, only \$1,725 was paid for  
25 information relating to this investigation.

26 CI#1's criminal history is as follows: (a) Arrested on October 18, 1996, by the Beaverton,  
27 Oregon Police Department, for Negotiating a Bad Check and Theft Second Degree; convicted  
28 of a Misdemeanor, Negotiating a Bad Check, by Beaverton, Oregon Municipal Court; the  
charges for the Second Degree Theft were dismissed; (b) arrested October 12, 1996, by Portland,  
Oregon Police Department for Robbery Second Degree and Criminal Possession of Rented or  
Leased Property; on November 26, 1996, convicted of a Felony Theft, and Misdemeanor Theft  
Second Degree in Portland, Oregon Circuit Court; convicted on December 10, 1996, of  
Misdemeanor, Assault Fourth Degree, Theft Second Degree, and Robbery Second Degree  
Portland, Oregon Circuit Court; the charges of Negotiating a Bad Check and Criminal  
Possession of Rented or Leased Property were dismissed; (c) arrested on November 8, 1996, by  
the Washington County, Oregon Sheriff's Office, for Theft First Degree and Parol Violation;  
convicted on February 11, 2000, for Felony, First Degree Theft, in Hillsboro, Oregon Circuit  
Court; there is no known disposition regarding the Parole Violation noted in NCIC; (d) arrested  
December 15, 1999, by Washington County, Oregon Sheriff's Office for Failure to Appear and  
Failure to Appear - Theft; convicted on February 11, 2000 for Felony, Failure to Appear in  
Circuit Court Hillsboro, Oregon; (e) CI#1 also has been arrested for, but not convicted of,  
charges including possession of narcotics, possession of stolen property, bank fraud, and failure  
to appear.

1 Kang stated that he had a Chinese and a Malaysian girl available. CI#1 drove to 92nd  
2 Avenue and Holgate Street, and called Kang again. Kang then told CI#1 to drive to the  
3 house located at 4510 Southeast 96th Avenue, Portland. Surveillance agents observed  
4 CI#1 talking with an Asian male in front of the residence. The Asian male introduced  
5 himself to CI#1 as "Jim" (subsequently identified as Yong Jun Kang).<sup>2</sup> CI#1 asked Kang  
6 if he could pay to take a girl to a hotel room. Kang told CI#1 that the girls are not  
7 allowed to leave the house. CI#1 told Kang that he did not want to come inside the  
8 brothel, but that he would come back another time.

9 On January 14, 2005, CI#1 drove to Kang's brothel, parked outside, and placed a  
10 consensually recorded phone call to Kang at (503) 425-9898. Kang told CI#1 that he had  
11 one "girl" working, and told CI#1 to come into the brothel. Kang opened the door and  
12 spoke with CI#1 (this conversation was consensually recorded). Kang told CI#1 that he  
13 had to wait because the prostitute was with another customer, and that the "girl" cost  
14 \$120 "for everything" (sexual intercourse). Kang instructed CI#1 to pay the \$120 fee  
15 directly to the prostitute after sex. Kang told CI#1 that the prostitute was Chinese, and  
16 that he recently had a Vietnamese "girl" who had traveled up from California. Kang also  
17 stated that in a few days, the Chinese prostitute was leaving town, and would be replaced  
18 by a new Chinese prostitute. While he was waiting, CI#1 observed another customer  
19 arrive at the brothel. The customer left when Kang told him that the prostitute was  
20 "busy," and that CI#1 was next in line. CI#1 eventually told Kang that he could not wait  
21 any longer, and departed the brothel. On his way out, Kang told CI#1 to come back  
22 again, because the next Chinese prostitute would be "very beautiful."

23 On January 21, 2005, CI#2 informed FBI agents in Portland about an Asian brothel  
24 which was operating out of a house in the vicinity of Southeast 96th Avenue and Holgate  
25  
26  
27

28 <sup>2</sup> CI#1 subsequently was shown a photograph of Yong Jun Kang, date of birth October 12, 1969, obtained through the Colorado Department of Motor Vehicles. CI#1 positively identified Kang as the person known to him as "Jim."

1 Street.<sup>3</sup> CI#2 stated that he had been to the brothel on four occasions, during which he  
2 had sexual intercourse with prostitutes. On one occasion, a Malaysian prostitute told him  
3 that she had come to Portland from New York, and would be leaving for another city in a  
4 few days. During another visit to the brothel, a Thai prostitute told CI#2 that she would  
5 be leaving for Los Angeles the next day. According to CI#2, the operator of the brothel  
6 was named "James." Based on this investigation, I know that "James" and "Jimmy" are  
7 the nicknames regularly used by Kang.

8 On February 8, 2005, CI#1 placed a consensually recorded telephone call to (503)  
9 425-9898 and spoke to Kang. CI#1 asked Kang whether he had a girl "up there" (at the  
10 brothel). Kang replied that he had a Chinese "girl" who had been working for three days  
11 and would be leaving on February 14, 2005. CI#1 told Kang that he did not like Chinese  
12 women. Kang stated that CI#1 should call him back after February 14th, when he had a  
13 new prostitute.

14 On February 14, 2005, CI #1 placed a consensually recorded telephone call to  
15 (503) 425-9898 and spoke with Kang. Kang told CI#1 that he had a "girl" from Hong  
16 Kong at the brothel, and that the Chinese prostitute left the day before. CI#1 then drove  
17 to the brothel, where he talked with Kang in the back yard of the house. The conversation  
18 lasted approximately twenty minutes, and was observed by FBI surveillance agents. CI#1  
19 told Kang that he did not like the looks of the prostitute from Hong Kong. Kang replied  
20 that he had another "girl" coming the next day. CI#1 told Kang that he knew a  
21 Vietnamese woman who wanted to work as a prostitute, and asked Kang if he was  
22 interested in using her. Kang told CI#1 that he wanted to see the woman's picture, and  
23 that she had to be attractive. Kang further stated that he had problems in the past with  
24 Vietnamese prostitutes, because customers have complained that they were "mean."

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25  
26 <sup>3</sup> CI#2 was a customer at Kang's brothel in Portland, and provided unsolicited information  
27 about the brothel to FBI agents in Portland. CI#2 was not compensated in any manner for the  
28 information CI#2 provided. Further, CI#2 was not made operational, and therefore did not  
receive further direction from the FBI. The information CI#2 has provided in this investigation  
has been corroborated with other investigative tools. CI#2's criminal history consists of arrests  
in 2004 and 2005 for Failure to Appear and Driving Under the Influence.



1 Kang also stated that he had enough "girls" at the present time, and that he gets "a new  
2 girl" about every ten days. Kang explained that he did not keep a prostitute at the brothel  
3 for more than ten days, because his customers "want new faces." Kang further explained  
4 that when the prostitutes stay too long, his customers complain that they want someone  
5 new. Kang then received a telephone call, and CI#1 departed the brothel.

6 On February 21, 2005, CI#1 met with Kang at the brothel and engaged in a  
7 consensually recorded conversation. Kang told CI#1 that he currently had a Thai  
8 prostitute working for him, and that on February 24th she would leave town and be  
9 replaced by another prostitute. CI#1 asked Kang how the prostitutes entered the United  
10 States from their home countries. Kang said he has "heard" that they are smuggled in  
11 "through containers" (shipping containers) although he explained that he is not involved  
12 in that process. CI#1 asked whether the prostitutes were "illegal" aliens. Kang replied, "I  
13 don't know. They are here now, so who cares?" Kang further explained that the women  
14 pay \$50,000 to be smuggled into the United States. Kang explained that the price was so  
15 high because, "the transporter . . . because [it's a] risky game, if they die [in the  
16 containers], if they are caught, they go to federal court." Based on my training and  
17 experience, I believe Kang was explaining to CI#1 that the smugglers charge substantial  
18 fees because they run the risk of getting caught and facing federal prosecution, especially  
19 if any of the smuggled aliens die in the shipping containers en route to the United States.  
20 CI#1 asked Kang whether he had "connections" with the people who smuggle the  
21 women, and Kang replied that he knew people who smuggled Chinese women.

22 During the same conversation, Kang told CI#1 that he earned approximately  
23 \$3,000 per month running the brothel. Kang explained that initially it was difficult, but  
24 now he has "girls coming every ten days." CI#1 stated that he wanted to get into the  
25 brothel business, and asked whether Kang would "show him how to do it." Kang replied,  
26 "I show you how, then where are you going?" Kang then explained that the first step  
27 would be to choose a location for the brothel, and that it was essential to be in a city with  
28 a large Asian community. Kang further stated that CI#1 could not open a brothel in

1 Portland, Seattle, Sacramento, San Francisco, Oakland, San Jose, or Los Angeles, because  
2 there were already Asian brothels in those cities. Kang suggested that CI#1 consider Salt  
3 Lake City, Utah as a place in which to open a brothel. During their conversation, Kang  
4 received a call on his cell phone. Kang answered the phone and stated, "New one,  
5 Malaysian, she's good, service is very good." Based on my training and experience, I  
6 believe that Kang was explaining to a customer that he had a new Malaysian prostitute  
7 working in his brothel, and was encouraging the customer to visit the brothel.

8 On March 31, 2005, CI#1 engaged in a consensually recorded conversation with  
9 Kang. They initially met at the brothel, but Kang asked CI#1 to meet him at a nearby  
10 coffee shop, because he did not want to talk in front of the other customers at the brothel.  
11 At the coffee shop, CI#1 and Kang continued to discuss the possibility of CI#1 opening a  
12 brothel in Salt Lake City. CI#1 told Kang that there were 20,000 Asians who lived in Salt  
13 Lake City. Kang replied, "20,000 ain't nothing. Right here [Portland] 100,000, and  
14 business is still slow. 20,000 and you're a hungry man!" Kang then asked CI#1, "So  
15 what else do you want to know?" In response to questions by CI#1, Kang stated that if  
16 CI#1 opened a new brothel, he initially would have to "guarantee" the prostitutes a  
17 minimum of \$500-\$600 per day, in order to find women to work at the brothel. Kang  
18 explained that if a prostitute only had two customers on one day (a total of \$240 fee),  
19 CI#1 would be responsible for paying her the additional money. Kang stated that after  
20 the brothel becomes more established, and attracts more customers, it would no longer be  
21 necessary for CI#1 to subsidize the prostitutes in that way. CI#1 asked whether Kang  
22 would help him find "girls" to work at his brothel. Kang replied, "I said yes. . . . I cannot  
23 send [the girls], but I will have the girl call you." Kang asked CI#1 how many prostitutes  
24 he would want at the brothel. CI#1 replied, "One, every time, you know, every ten days  
25 you have to change the girl for me." Kang replied, "That's right." Also during this  
26 conversation, Kang claimed that business at his brothel was "slow," and that he was  
27 considering moving the location of his brothel.

28

1 On May 23, 2005, CI#1 received a telephone call from Kang. Kang told CI#1 that  
 2 he had relocated to Seattle, and he wanted CI#1 to come to Seattle to talk about  
 3 "business." Three days later, on May 26, 2005, CI#1 met with Kang in an Asian  
 4 restaurant in South Seattle (this conversation was consensually recorded). During this  
 5 conversation, Kang told CI#1 that he arrived too late, because Kang needed him to come  
 6 up to Seattle right away after he had called. Kang explained that he called CI#1 because  
 7 he wanted CI#1 to manage a brothel in Tacoma, Washington, but that now it was no  
 8 longer necessary. CI#1 asked Kang if CI#1 could open a brothel in Portland, now that  
 9 Kang had moved to Seattle. Kang replied that the brothel was still open in Portland, and  
 10 his "partner" was running it now. Kang told CI#1 that he would look for other work  
 11 opportunities for CI#1 in the Seattle area.

#### 12 B. The Raymond Street Brothel.

13 Subsequent investigation confirmed that Kang relocated his brothel to Seattle. On  
 14 August 3, 2005, CI#3 was unexpectedly approached by Kang at the Rainier City Café in  
 15 Seattle.<sup>4</sup> CI#3 was at the café visiting with friends. Kang introduced himself as "Jimmy,"  
 16 and stated that he operated a brothel. Kang showed CI#3 photographs of female  
 17 prostitutes which were stored on his cellular telephone. Kang told CI#3 that the fee to be  
 18 with the prostitutes was \$120. Kang provided CI#3 with his phone number, 206-661-

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19  
 20 <sup>4</sup> CI#3 has provided reliable information to ICE since March 2005. CI#3 became a  
 21 confidential informant following his arrest by the DEA for possession of 230 pounds of  
 22 marijuana. CI#3 subsequently entered a guilty plea to the charges, and is cooperating with law  
 23 enforcement in the hopes of receiving a lower sentence. Following CI#3's arrest, CI#3 provided  
 24 a statement enumerating CI#3's criminal activities; the statement was consistent with the  
 25 information known to the DEA as a result of its investigation. CI#3 also has provided reliable  
 26 information regarding additional ICE narcotics investigations. The information CI#3 has  
 27 provided in this investigation has been corroborated with other investigative tools. To date, none  
 28 of the information provided by CI#3 has proven to be false.

29 CI#3's criminal record is as follows: (a) Arrested on December 18, 1996, by King County,  
 30 Washington Sheriff's Office for two Gross Misdemeanors: Assault 4 ( Domestic Violence) and  
 31 Obstructing a Law Enforcement Officer; On June 1, 1998, found guilty of the Assault 4 and of  
 32 Interference with Reporting of Domestic Violence, Northeast District County, Washington; (b)  
 33 arrested on September 19, 2003, by the Renton, Washington Police Department, for Failure to  
 34 Comply; pled guilty on December 1, 2003; (c) on December 1, 2003, CI#3 pled guilty to Driving  
 35 while License Revoked, a Misdemeanor; (d) CI#3 also has been arrested for, but not convicted  
 36 of, charges including driving under the influence.

1 3675 (TT2), and told him to call TT2 if he ever wanted to visit the brothel. CI#3 later  
 2 learned from some friends that Kang's brothel was located at 4200 South Raymond  
 3 Street, Seattle. CI#3 never visited the brothel, but instead provided the above information  
 4 to ICE agents. According to phone company records, Kang was the subscriber for TT2,  
 5 which was billed (at that time) to 4200 South Raymond Street, Seattle (the brothel  
 6 location).

7 CI#4 subsequently provided information to the SPD regarding Kang's brothel.<sup>3</sup>  
 8 Specifically, CI#4 reported that there was a brothel located at 4200 South Raymond  
 9 Street, Seattle, which had been in operation since approximately May 2005. CI#4 learned  
 10 about the brothel from a co-worker, who frequently visited the brothel as a customer.  
 11 CI#4 stated that the brothel was open daily between noon and 1:00 a.m., and that the  
 12 contact phone number for the brothel was 206-661-3675 (TT2). CI#4 further reported  
 13 that the brothel was operated by "James," who CI#4 subsequently identified as Yong  
 14 Kang, by reviewing Kang's driver's license photograph. According to CI#4, prostitutes  
 15 work at Kang's brothel for approximately two weeks, after which they are replaced with  
 16 new prostitutes.

17 In September 2005, CI#4 visited Kang's brothel for the first time (prior to working  
 18 with law enforcement). Prior to going to the brothel, CI#4 called TT2 and spoke to Kang  
 19 to arrange the visit. CI#4 used code words to ask whether there were prostitutes

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21 <sup>3</sup> CI#4 has been working with the SPD since September 2005. Among other things, CI#4  
 22 has visited Kang's and Zhenhua Liu's brothels as a customer. In 2005, CI#4 was arrested and  
 23 convicted of federal narcotics charges, and CI#4 is cooperating with law enforcement in the  
 24 hopes of receiving a sentencing reduction. CI#4 has not been paid any money for the  
 25 information CI#4 provided. CI#4 also has supplied reliable information regarding additional  
 26 investigations conducted by the SPD, including a narcotics investigation wherein CI#4 identified  
 27 three drug dealers from whom drug purchases were ultimately made. The information CI#4 has  
 28 provided in this investigation has been corroborated with other investigative tools. To date, none  
 of the information provided by CI#4 has proven to be false. On many of the occasions when  
 CI#4 visited Kang's or Liu's brothels, CI#4 engaged in sexual activity with a prostitute.

CI#4's criminal history is as follows: (a) On February 13, 1995, arrested for Conspiracy to  
 Commit Murder and Attempted Murder, in Dodge City, Kansas; On September 8, 1995, pled  
 guilty to Premeditated Attempted Murder, and was subsequently sentenced to three years in jail;  
 (b) on February 26, 2005, arrested by the DEA for Possession of Dangerous Drugs; pled guilty to  
 federal narcotics charges; (c) CI#4 also has been arrested for, but not convicted of, charges  
 including Failing to Appear and Hit and Run.

1 available. Specifically, CI#4 asked Kang whether the "restaurant" (brothel) was open,  
2 and what type of "food" (women) was available. Kang described the nationalities of the  
3 prostitutes by referring to food dishes such as "kimchee" (Korean prostitute) and "pho"  
4 (Vietnamese prostitute). Kang then instructed CI#4 to meet at the Viet Wah market (a  
5 well-known Asian market in Seattle). Kang met CI#4 at the market, and then instructed  
6 CI#4 to follow his vehicle to the brothel location. Kang then escorted CI#4 to the house  
7 located at 4200 South Raymond Street. At the brothel, CI#4 was contacted by an Asian  
8 male who was managing the business. CI#4 subsequently identified this male as Zhaozhu  
9 Tian, by reviewing Tian's Texas driver's license photograph. According to CI#4, Tian's  
10 duties at the brothel consisted of greeting customers and offering them tea, letting the  
11 customers know when the prostitutes are ready for them, and cooking meals for the  
12 prostitutes. CI#4 offered to pay Tian the fee of \$120, but Tian told CI#4 to pay the fee  
13 directly to the prostitute. An Asian female took CI#4 upstairs and asked CI#4 to take a  
14 shower. After the shower, the prostitute provided CI#4 with a massage, performed oral  
15 sex, and engaged in sexual intercourse with CI#4. CI#4 then paid her the \$120 fee. The  
16 prostitute told CI#4 that she had been working at the brothel for approximately ten days,  
17 and that in a few days she was moving to another brothel in California.

18 On September 15, 2005, ICE agents conducted a search of discarded trash at the  
19 Raymond Street brothel. Among other things, agents discovered garbage bags filled with  
20 hundreds of used condoms.

21 On October 19, 2005, CI#4 visited the Raymond Street brothel for the second time  
22 (prior to CI#4 working with law enforcement). CI#4 called TT2 and spoke to Kang.  
23 CI#4 asked Kang what kind of "food" he had, using this code to refer to the nationality of  
24 the prostitutes. Kang told CI#4 that he had "pho" (Vietnamese prostitute) and "dim sum"  
25 (Chinese prostitute), and invited CI#4 to the brothel. When he arrived, CI#4 observed  
26 Tian working again as the manager of the brothel. A Vietnamese prostitute took CI#4  
27 upstairs. Once they got upstairs, CI#4 engaged in sexual intercourse with the prostitute,  
28 and then paid her the \$120 fee.

1 On October 25, 2005, I tasked CI#5 to pose as a potential brothel customer.<sup>6</sup> CI#5  
 2 called TT2 and spoke to Kang, who used the alias "Jimmy." CI#5 asked Kang if he could  
 3 "come down" to the brothel, and Kang stated that CI#5 could. CI#5 then went to the  
 4 Raymond Street brothel. There were three Asian females eating in the kitchen, and an  
 5 Asian male was cooking food in the kitchen (CI#5 subsequently identified this male as  
 6 Zhaozhu Tian, by viewing Tian's Texas driver's license photograph). According to CI#5,  
 7 one of the prostitutes was Korean, another was Chinese, and CI#5 could not tell the  
 8 ethnicity of the third. There were also two Asian male customers, who were waiting for  
 9 the prostitutes to finish eating. Tian told CI#5 that "new girls" would be arriving in a few  
 10 days. Shortly thereafter, a Korean prostitute took CI#5 upstairs and provided CI#5 with a  
 11 shower, a massage, and offered sexual services. She stated that her name was "Mi Mi,"  
 12 she had recently arrived from Los Angeles, and she would be returning there in three  
 13

14 <sup>6</sup> CI#5 has been working with the FBI's Seattle Division since March 1998. In this  
 15 investigation, CI#5 has visited Kang's brothels in Seattle as a customer. Information provided by  
 16 CI#5 was critical to the success of Operation Syclops (described above). Specifically,  
 17 information provided by CI#5, including CI#5 engaging targets in consensually recorded  
 18 conversations, was heavily relied upon by agents in applying for, and receiving, Title III  
 19 authorization and arrest and search warrants in Operation Syclops. Information provided by  
 20 CI#5 has proven to be reliable, and has been the basis for criminal charges that have resulted in  
 21 convictions, search warrants, and a successful Title III application. CI#5 has been paid for the  
 22 information CI#5 provided, and has been compensated for any expenses he incurred as a result  
 23 of his cooperation. Between 1998 and May 31, 2006, CI#5 has received a total of \$33,712.51  
 24 from the FBI for information and expenses. CI#5 has received only \$870 for information  
 25 provided in this investigation. The information provided by CI#5 in this investigation has been  
 26 corroborated by other informants and investigative tools. To date, CI#5 has not provided any  
 27 known false information. On one occasion, CI#5 engaged in sexual activity with a prostitute at  
 28 Kang's brothel.

CI#5's criminal record is as follows: (a) Found guilty of a Class B Felony, Theft, on June  
 8, 1990, in King County, Washington District Court; (b) arrested for Possession of Stolen  
 Property, by the Bellevue, Washington Police Department on February 7, 1990, and found guilty  
 of a Class C Felony, Theft 2, on April 26, 1991, in King County, Washington District Court; (c)  
 arrested by the Redmond, Washington Police Department for a Class C Felony, Possession of  
 Stolen Property, on August 8, 1990; found guilty of a Gross Misdemeanor, Attempted  
 Possession of Stolen Property, in King County, Washington District Court on November 30,  
 1990; (d) arrested by the Grays Harbor County, Washington Sheriff's Office for a Felony,  
 Burglary, and a Class C Felony, Theft 2, on April 24, 1991, and arrested by the Grays Harbor,  
 Washington Sheriff's Office for a Class C Felony, Malicious Mischief 2, on April 26, 1991;  
 found guilty of a Class C Felony of Residential Burglary on September 27, 1991; (e) arrested for  
 a Game/Fish Violation by Kittitas County, Washington Sheriff's Office, on May 20, 1995; found  
 guilty of the same charge on May 22, 1995; (f) CI#5 also has been arrested for, but not convicted  
 of, charges including possession of burglary tools, and possession of stolen property.

1 days.

2 In early November 2005, CI#4 visited the Raymond Street brothel at the direction  
3 of SPD officers. Prior to visiting the brothel, CI#4 called Kang on TT2. Kang told CI#4  
4 that there was a "Kimchee" (Korean prostitute) and a "Phó dish" (Vietnamese prostitute)  
5 at the brothel. Kang further stated that CI#4 could come to the brothel. When CI#4  
6 arrived, Tian again was working as the brothel manager. A Korean prostitute offered to  
7 provide CI#4 with a shower, massage, and sexual intercourse in exchange for the \$120  
8 fee. As CI#4 went to leave the brothel, Tian encouraged CI#4 to bring more friends on  
9 his next visit.

10 On November 28, 2005, CI#4 visited the Raymond Street brothel at the direction  
11 of SPD officers. He contacted Kang at TT2 to make arrangements for the visit. When  
12 CI#4 arrived at the brothel, Zhaozhu Tian let CI#4 inside the house. CI#4 observed a  
13 Thai prostitute and a Vietnamese prostitute working at the brothel. Tian told CI#4, "Take  
14 your pick." CI#4 met with the Thai prostitute, who stated that she entered the United  
15 States three years ago on a visa, and that she lived in Phoenix, Arizona. She further stated  
16 that she had arrived in Seattle two weeks ago by airplane, and that Kang transported her  
17 from the airport to the brothel. According to CI#4, she further stated that she had called  
18 Kang, whom she referred to as "James," two months earlier to get on a "waiting list" to  
19 work at his brothel. The statements made by this Thai prostitute confirm that Kang's  
20 brothel is part of a highly organized national network, or prostitution ring. Specifically,  
21 these types of brothels often keep schedules, booking prostitutes months in advance, as  
22 described by this Thai prostitute. This type of organization and planning is necessary  
23 because the women are transported and rotated between the brothels every seven to  
24 fourteen days, requiring a significant degree of coordination between the brothels across  
25 the country.

26 On December 1, 2005, SPD officers conducted a search of discarded trash at the  
27 Raymond Street brothel. The trash contained numerous used condoms.

1           **C.     The Shaffer Avenue Brothel.**

2           Kang subsequently moved his brothel from the Raymond Street location to a  
3 residence on Shaffer Avenue South, Seattle. Based on my training and experience, I  
4 know that it is common for brothel operators to move the location of their brothel  
5 approximately every six months, in an effort to avoid law enforcement detection. The  
6 new brothel location was revealed by the monitoring of a court-authorized GPS tracking  
7 device on Kang's former vehicle, a gold Dodge Caravan. In late December 2005 and  
8 early January 2006, Kang no longer drove to the Raymond Street address, but began to  
9 travel regularly to the house located at 6306 Shaffer Avenue South, Seattle. Comcast  
10 cable records confirmed that Kang's high speed Internet service at the Raymond Street  
11 brothel was disconnected on January 11, 2006, and was reactivated at the Shaffer Avenue  
12 address.

13           On January 18, 2006, CI#4 contacted Kang by calling him on TT2. CI#4 asked  
14 whether Kang had any "girls." Kang said he did, and informed CI#4 that he recently  
15 moved the brothel to a new location. Kang instructed CI#4 to meet him at a McDonald's  
16 restaurant in Seattle, and from there escorted CI#4 to the new brothel at 6306 Shaffer  
17 Avenue. CI#4 observed a different Asian male (not Tian) working as the manager of the  
18 brothel. CI#4 subsequently identified him as Pengquan Xie, after reviewing Xie's  
19 California driver's license photograph.<sup>7</sup> There were two prostitutes working at the  
20 brothel; one woman was Vietnamese and the other was Thai. The Thai prostitute  
21 introduced herself to CI#4 as "Vivien," but CI#4 subsequently identified her as Jutakarn  
22 Manurangsan by reviewing her New York state driver's license photograph.  
23 Manurangsan told CI#4 that she was from Bangkok, Thailand. She also stated that she  
24 has been in the United States for two years working as a prostitute, and she planned to  
25 stay in the United States for five or six more years. According to CI#4, Manurangsan told  
26

27  
28           <sup>7</sup> Travel records establish that Kang's email account was used to purchase an airline ticket  
for Tian for one-way travel from Seattle to Houston, Texas on December 16, 2005. It appears  
that Tian has not returned to Seattle, and that Xie replaced Tian as the manager of Kang's  
brothel.



1 CI#4 that she came to Seattle from New York City several days ago, and she planned to  
2 work at Kang's brothel for eight more days.

3 On January 22, 2006, CI#4 visited the Shaffer Avenue brothel at the direction of  
4 SPD officers. CI#4 asked to use Xie's cellular telephone, for the purpose of attempting to  
5 identify Xie's phone number. Xie agreed to allow CI#4 to place a call on his phone.  
6 CI#4 placed a call to CI#4's own cellular telephone, and then used the caller identification  
7 function to record Xie's number as 626-230-8508.

8 On April 27, 2006, CI#5 placed a telephone call to TT2 and spoke to Kang, who  
9 gave CI#5 permission to visit the Shaffer Avenue brothel. When the CI#5 arrived outside  
10 the brothel, CI#5 called Kang again at TT2. Shortly thereafter, CI#5 was let into the  
11 brothel by an Asian male who introduced himself as "Lee." CI#5 subsequently identified  
12 "Lee" as Pengquan Xie, after reviewing Xie's California driver's license photograph.  
13 Once inside the brothel, CI#5 saw two prostitutes sitting in the livingroom; one woman  
14 was Korean, and the other was Thai. There was also a third woman in the kitchen,  
15 although CI#5 did not get a close look at her. Xie asked CI#5 which prostitute he wanted  
16 to be with, and CI#5 selected the Thai woman. She told CI#5 that her name was  
17 "Nancy," and that she was from New York City. Nancy stated that she was scheduled to  
18 leave Seattle and return to New York in a few days. Nancy further stated that a new  
19 female was coming to work at the brothel the day before she (Nancy) left. Based on my  
20 training and experience, I believe that Nancy was describing an example of the  
21 coordinated rotation of woman in and out of Kang's brothel. On the way out of the  
22 brothel, CI#5 asked Xie if he knew of any brothels in Las Vegas, Nevada. Xie stated that  
23 he would have to ask Kang about that.

24 On May 17, 2006, CI#5 called TT2 and spoke with Kang. Kang gave CI#5  
25 permission to visit the Shaffer Avenue brothel. CI#5 traveled to the brothel, and called  
26 Kang at TT2 when he arrived. Kang told CI#5 to enter the brothel. Xie was managing  
27 the brothel, and offered CI#5 some water while CI#5 waited for a prostitute to become  
28 available. According to CI#5, there were three prostitutes working at the brothel, and

1 there were two other customers waiting. CI#5 met with a Vietnamese prostitute who used  
 2 the name "Thao." She stated that she came to Seattle from Santa Ana, California a few  
 3 days ago, and that she would be leaving the following day. Thao explained that she was  
 4 being "replaced" by a Thai prostitute who also was from Santa Ana. After leaving the  
 5 brothel, CI#5 called Kang at TT2. CI#5 stated that the "Vietnamese girl was good."  
 6 CI#5 also told Kang that CI#5 was traveling to Portland soon, and asked whether Kang  
 7 could refer CI#5 to any brothels in Portland. Kang told CI#5 to call him when CI#5 got  
 8 to Portland, implying that he would direct CI#5 to a brothel at that time.

9 **D. Pre-Wiretap Evidence of Kang's Facilitation of Interstate Travel in**  
 10 **Furtherance of Prostitution.**

11 Kang uses email and Internet communications to arrange transportation for Asian  
 12 women working as prostitutes at his brothel. Records obtained from Orbitz, an Internet  
 13 travel website, reveal that Kang maintains a customer account with Orbitz. Kang logs  
 14 into Orbitz using his email account of [jimmykang168@hotmail.com](mailto:jimmykang168@hotmail.com). Between September  
 15 2004, and early April 2006, Kang's Orbitz account was used to purchase airline tickets  
 16 for numerous Asian females, as summarized in the table below:

Date	Purchaser	Passenger	Flight Itinerary
9/4/04	Yong Jun Kang	Peng Chong	Portland to New York
9/21/04	Yong Jun Kang	Lee Minjoo	Portland to Oakland
10/3/04	Rong Zhao	Rong Zhao	New York to Portland
10/16/04	Rong Zhao	Rong Zhao	Portland to San Francisco
10/17/04	Yong Jun Kang	Kamolchanok Wichian	Portland to Burbank
10/23/04	Rong Zhao	Rong Zhao	San Francisco to New York
12/3/04	Xinping Wang	Xinping Wang	Portland to Sacramento
12/31/04	Yong Jun Kang	Geokkhim Gan	New York to Portland
1/10/05	Yong Jun Kang	Geokkhim Gan	Portland to New York
1/24/05	Yong Jun Kang	Xiaosu Ye	Oakland to Fort Lauderdale
2/2/05	Yong Jun Kang	Xiaosu Ye	Fort Lauderdale to Oakland
3/16/05	Yong Jun Kang	Thongyot Liamurai	Los Angeles to Portland
3/26/05	Yong Jun Kang	Thongyot Liamurai	Portland to San Jose

	Date	Purchaser	Passenger	Flight Itinerary
1				
2	6/6/05	Yong Jun Kang	Sukanya Thamrungsae	Portland to Los Angeles
3	6/11/05	Yong Jun Kang	Saifon Saensuk	Los Angeles to Seattle
4	6/21/05	Yong Jun Kang	Saifon Saensuk	Seattle to Las Vegas
5	6/22/05	Yong Jun Kang	Danweol Choi	Seattle to Los Angeles
6	6/22/05	Yong Jun Kang	Anh Hoang	Houston to Seattle
7	6/24/05	Yong Jun Kang	Hueilan Chang	Seattle to San Jose
8	7/2/05	Yong Jun Kang	Anthony Hoang	Seattle to Monro, La.
9	7/3/05	Yong Jun Kang	Anh Hoang	Seattle to Houston
10	7/9/05	Yong Jun Kang	Thongyot Liamurai	Santa Ana to Seattle
11	7/11/05	Yong Jun Kang	Misun Jung	Seattle to Los Angeles
12	7/11/05	Yong Jun Kang	Hueilan Chang	San Francisco to Dallas
13	7/12/05	Yong Jun Kang	Thongyot Liamurai	Seattle to San Jose
14	7/13/05	Yong Jun Kang	Hueilan Chang	Dallas to Portland
15	7/20/05	Yong Jun Kang	Patchanee Chaichana	Seattle to Los Angeles
16	7/22/05	Yong Jun Kang	Phuong Doan	Jacksonville to Seattle
17	7/22/05	Yong Jun Kang	Danweol Choi	Seattle to Los Angeles
18	7/27/05	Yong Jun Kang	Hueilan Chang	Portland to Las Vegas
19	8/2/05	Yong Jun Kang	Phuong Doan	Seattle to Jacksonville
20	8/24/05	Yong Jun Kang	Hueilan Chang	Seattle to San Jose
21	9/1/05	Yong Jun Kang	Mun Nijun	Seattle to Los Angeles
22	9/25/05	Yong Jun Kang	Anh Hoang	Seattle to Philadelphia
23	12/27/05	Yong Jun Kang	Linda Duong	Los Angeles to Seattle
24	1/21/06	Jutakarn Manurangsarn	Jutakarn Manurangsarn	Seattle to Oakland
25	2/11/06	Yong Jun Kang	Vanisa Songsok	Seattle to Dallas
26	3/15/06	Yong Jun Kang	Mi Jung	Seattle to San Francisco
27	3/24/06	Yong Jun Kang	Ying Lin	Pittsburgh to Seattle
28	4/2/06	Yong Jun Kang	Ying Lin	Seattle to Los Angeles
	4/3/06	Yong Jun Kang	Ying Lin	Los Angeles to Pittsburgh

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1        **Between December 2005, and March 2006, agents received court authorization to**  
2 **install a GPS tracking device on a gold Honda minivan that Kang used as his primary**  
3 **vehicle during that time period. GPS data shows that Kang's vehicle traveled to Sea-Tac**  
4 **Airport on many of the same dates that the above-listed Asian females traveled in or out**  
5 **of Seattle. Specifically, Kang's vehicle was at Sea-Tac Airport on the following dates:**  
6 **December 16, 2005, December 21, 2005, December 22, 2005, December 27, 2005,**  
7 **December 31, 2005, January 2, 2006, January 11, 2006 (two separate trips), January 15,**  
8 **2006, January 21, 2006 (two separate trips), February 1, 2006 (two separate trips),**  
9 **February 10, 2006 (two separate trips), February 11, 2006 (two separate trips), February**  
10 **17, 2006, February 20, 2006 (three separate visits), February 21, 2006, February 23, 2006,**  
11 **March 1, 2006, March 2, 2006 (two separate trips), March 11, 2006, March 12, 2006 (two**  
12 **separate visits), March 13, 2006 (three separate visits), March 15, 2006 (two separate**  
13 **visits), March 17, 2006 (two separate visits), March 18, 2006, March 19, 2006, and**  
14 **March 22, 2006.**

15        **E. Court Authorized Wiretaps Over Kang's Telephones.**

16        **Beginning May 31, 2006, court-authorized wiretaps commenced over two**  
17 **telephones used by Yong Kang: Target Telephone 1 ("TT1"), cellular telephone number**  
18 **(206) 355-0508, and Target Telephone 2 ("TT2"), cellular telephone number (206) 661-**  
19 **3675. Kang used TT1 as his primary "business phone," over which he communicated**  
20 **with prostitutes; Seattle area target subjects, including Kesheng Zhu, Pengquan Xie,**  
21 **Liancheng Ning, Zheng Qu, and Thongyot Liamurai; and other coconspirators located**  
22 **throughout the United States, including other brothel operators and brokers. Kang used**  
23 **TT2 as his "customer line," over which he communicated with customers to arrange for**  
24 **them to visit the brothel. On occasion, however, Kang spoke with coconspirators over**  
25 **TT2.**

26 //

27 //

28 //

1 **F. Wiretap Calls Between Kang and Prostitutes.**

2 Kang often used TT1 to coordinate the transportation of prostitutes to and from  
 3 Seattle, and to arrange for the transportation of prostitutes between Sea-Tac Airport and  
 4 his brothel. Since the commencement of interception over TT1 and TT2, numerous  
 5 prostitutes have worked at Kang's brothel, including women from China, Korea,  
 6 Thailand, Vietnam, Malaysia, Singapore, Hong Kong, Taiwan, and Laos. Based on the  
 7 intercepted calls, physical surveillance teams have observed Kang and other target  
 8 subjects dropping-off or picking-up prostitutes at Sea-Tac Airport, in furtherance of the  
 9 interstate prostitution activities. Some of the most pertinent conversations between Kang  
 10 and prostitutes are summarized below. Unless otherwise indicated, the calls were  
 11 intercepted over TT1.<sup>9</sup>

12 **Calls 1, 12, 16:** On May 31, 2006, an unidentified prostitute informed Kang that  
 13 she had just arrived at Sea-Tac Airport. Kang stated that he was on his way to pick her  
 14 up. Shortly thereafter, surveillance agents observed Kang's silver Honda Odyssey  
 15 minivan (Washington license plate 404-UYP) enter the arrivals area of Sea-Tac Airport.  
 16 The vehicle stopped in front of a young Asian female, who loaded her luggage into the  
 17 van and sat in the passenger seat. Kang drove directly from the airport to the brothel at  
 18 4411 11th Avenue S., and he and the Asian female entered the brothel.

19 **Calls 10, 47:** On May 31, 2006, a prostitute named "Cherry" called Kang and  
 20 asked whether he had the "schedule." Kang told Cherry he would call her back, because  
 21 he did not have the scheduling "book" with him. On June 1, 2006, Kang told "Cherry"  
 22 that her "schedule" (at his brothel) would begin on September 21, 2006, because July and  
 23 August were "all booked."

24 **Calls 22, 24:** On May 31, 2006, Kang spoke with a prostitute who used a phone  
 25 subscribed to by Phatcharin Potha. For purposes of this affidavit, I will refer to this Asian  
 26

27 <sup>9</sup> Throughout this Complaint, certain intercepted conversations are summarized. On  
 28 occasion, quotations are included in the summaries. It should be noted that the vast majority of  
 the conversations are not in English, but are in Mandarin. The quotations are based on the initial  
 summaries prepared by the monitoring language specialists, not final transcripts.

1 female as "Potha," although her identity is not confirmed. Potha explained that she had  
2 previously worked at Kang's brothel, and was calling to schedule work for her friend  
3 "Keisha." She described Keisha as a "new girl" from Thailand who was "very pretty."  
4 Kang stated that there were no openings at his brothel until September or October.  
5 Ultimately, they agreed that either Keisha or Potha would work at the brothel between  
6 October 2, 2006, and October 12, 2006. Potha said she would call Kang in late  
7 September to confirm.

8 **Call 28:** On June 1, 2006, Kang spoke with an Asian female named "Wang," who  
9 lives in China. Wang stated that she was considering working as a prostitute in Asia.  
10 Kang encouraged her to do so, stating that she could "go out and make money." Kang  
11 opined, "It's not a bad thing." Kang told her that he had "connections" in Singapore,  
12 Hong Kong, Taiwan, Thailand, and Malaysia, and that he was "willing to help her with  
13 making connections."

14 **Calls 33-37:** On June 1, 2006, a prostitute called Kang and stated that she had  
15 arrived at Sea-Tac airport. Shortly thereafter, at approximately 11:20 a.m., surveillance  
16 agents observed Kang depart his residence at 3935 S. Cloverdale Avenue, Seattle, and  
17 drive his silver Honda Odyssey to Sea-Tac Airport. At 11:40 a.m., Kang's vehicle  
18 entered the arrivals area of the airport. Kang exited the vehicle, assisted a young Asian  
19 female in loading her luggage into the van, and they both entered the car. Surveillance  
20 agents followed the vehicle from the airport to Kang's brothel.

21 **Call 55:** On June 1, 2006, Kang spoke to an unidentified prostitute. Based on the  
22 conversation, it appears that she was working at Kang's brothel at the time of the call.  
23 She told Kang that she was not feeling well, and would be leaving "early" on Monday.  
24 Kang was very upset, and stated that she was "screwing up [his] business." Kang insisted  
25 that she find a "replacement" before she departed. The prostitute apologized, and asked  
26 for Kang's forgiveness.

27 **Call 64:** On June 1, 2006, an unknown prostitute asked Kang when she was  
28 scheduled to work at his brothel. Kang told her she was scheduled to work in November.

1 She told Kang that she was booked to work at other "houses" (brothels) prior to that.

2       **Calls 83 and 84:** On June 2, 2006, at approximately 1:00 p.m., Kang spoke to a  
3 prostitute who had just arrived at Sea-Tac Airport. Shortly thereafter, at approximately  
4 1:10 p.m., surveillance agents observed Kang arrive at the baggage claim area of the  
5 airport driving his silver Honda Odyssey. Kang's vehicle stopped in front of a young  
6 Asian female, Kang exited the vehicle to assist her with luggage, and they both entered  
7 the car. Kang then drove away from the airport.

8       **Calls 132-133:** On June 3, 2006, Kang spoke with an unknown prostitute. She  
9 stated that she was currently working at a brothel in Houston, and that she would be  
10 working next at a brothel in Virginia Beach, Virginia. The prostitute stated that there  
11 were a total of five prostitutes working in the Houston brothel. Kang stated that he has  
12 known the owner of the Houston brothel (referred to as "Jim") since 2001.

13       **Call 166:** On June 4, 2006, Kang spoke to a prostitute named "Candy" and  
14 explained how he operates his brothel. Kang stated that the customers pay \$120.00 for  
15 sex; the "house" keeps \$40.00; the prostitutes keep \$80.00, plus any tips; and the  
16 customers are only Asians, not Caucasians.

17       **Calls 191, 194:** On June 5, 2006, a prostitute named "Sonia" asked Kang for the  
18 specific dates on which she would be working. Kang told her that it was between  
19 September 21, 2006, and October 1, 2006.

20       **Calls 226, 248, 253, 261, 263, 269, 277-282 (TT1); 1943 (TT2):** On June 6,  
21 2006, a prostitute named "Nana" called Kang and stated that she would arrive on June 8,  
22 2006, at 8:44 p.m., and that she would call him with further details. On June 7, 2006,  
23 "Nana" advised Kang that she was landing at Sea-Tac Airport later that night. When she  
24 landed, she called Kang and made arrangements for him to pick her up and transport her  
25 to the brothel. Shortly thereafter, surveillance agents observed Kang arrive at the airport,  
26 driving his silver Honda Odyssey. Kang stopped the vehicle in front of an Asian female,  
27 who entered the minivan. Kang then drove the vehicle away from the airport. As  
28 described below, Nana departed Seattle on June 15, 2006, at which time she was

1 identified as Hyon Mi Choi, a Korean national. On June 17, 2006, a customer called  
2 Kang and asked whether the Korean prostitute named "Nana" was still "there" (at the  
3 brothel). Kang told the customer that Nana already left, but that he had two Thai  
4 prostitutes and one Malaysian prostitute.

5 Call 315 (TT1); 1186, 1240, 1242, 1427 (TT2): On June 9, 2006, a prostitute  
6 named "Tiffany" told Kang she would arrive the following evening at 10:30 p.m. On  
7 June 10, 2006, "Tiffany" called Kang when she arrived at Sea-Tac Airport. Kang stated  
8 that he would come meet her at the Delta Airlines terminal. Shortly thereafter,  
9 surveillance agents observed Kang meeting an Asian female at the airport. The Asian  
10 female entered Kang's silver Honda Odyssey, and the vehicle departed the airport.  
11 Through airline records, agents identified Tiffany as Thipyarat Ratchapong. The records  
12 indicate that she had arrived on a Delta Airlines flight from Salt Lake City, Utah.

13 Calls 345, 349: On June 11, 2006, Kang spoke to a prostitute named "Lilly." Lilly  
14 asked Kang to schedule her to work in his brothel, and explained that she was already  
15 scheduled at other brothels from June 15-30, July 13-23, November 1-15, and December  
16 1-10, 2006. Kang told Lilly that he was "fully booked until the end of October," and  
17 asked whether she could work beginning November 11, 2006. Lilly declined.

18 Calls 300, 360-61, 364, 366 (TT1); 1427 (TT2): On June 8, 2006, a prostitute  
19 named "Jessica" informed Kang that she would arrive in Seattle on June 11, 2006, at 8:44  
20 p.m., via Delta Airlines. On June 11, 2006, Kang spoke to "Jessica" and arranged to pick  
21 her up as she arrived at the airport. Through airline records, agents identified "Jessica" as  
22 Waileng Hou, a Chinese national, who had taken a flight from Boston, Massachusetts,  
23 through Cincinnati, Ohio, to Seattle, Washington. When she landed, Hou called Kang  
24 and stated that her luggage was missing. Kang instructed her to have the luggage sent to  
25 him at the brothel. Kang provided his full name, "James Kang"; the address of the  
26 brothel, 4411 11th Avenue S., Seattle; and the phone number for TT1. Close in time to  
27 these intercepted calls, surveillance agents observed Kang depart the brothel in his silver  
28 Honda Odyssey and drive directly to Sea-Tac Airport, where he met Hou. Hou entered



1 Kang's vehicle, and they departed the airport. Subsequent intercepted calls over TT2  
2 confirm that Delta airlines delivered Hou's luggage to Kang at the brothel.

3 **Call 492:** On June 14, 2006, Kang spoke to a prostitute who was scheduled to  
4 work at his brothel in the future. Kang asked if she remembered when her "schedule"  
5 was, and she said she did not know. Kang complained that "the girls (prostitutes) always  
6 booked a schedule, but never remembered." Kang said he would call her back with the  
7 dates.

8 **Calls 1639, 1659 (TT2):** On June 14, 2006, Kang spoke to a prostitute named  
9 "Paris," and arranged for her to work at his brothel. Paris told Kang that she got his  
10 number from "Mimi," and that Mimi told her to call Kang for "work in Seattle." Paris  
11 explained that she is from Hong Kong, and she lived in Los Angeles. She stated that she  
12 needed to make more than \$800.00 per day. Kang replied that \$800.00 per day would not  
13 be a problem, if she provides "good service" and is of "good quality herself" (good  
14 looking). Kang told Paris that he maintains three prostitutes working at his brothel. She  
15 expressed concern about making enough money if there were three prostitutes working.  
16 Kang assured her that he needed three prostitutes to "take care of" all of his customers.

17 **Call 524:** On June 15, 2006, Kang told a prostitute named "Kelly" that he had an  
18 "opening" on July 2, 2006. Kelly agreed to "take that schedule." Kang told her she  
19 would work from July 2nd through July 11, 2006. Kelly said she would call Kang after  
20 she booked her airplane tickets.

21 **Call 531:** On June 15, 2006, Kang confirmed with a prostitute named "Carla" that  
22 she was arriving on July 11, 2006.

23 **Call 541:** On June 15, 2006, while Thipyara Ratchapong (a/k/a "Tiffany") was  
24 working as a prostitute at Kang's brothel, Kang spoke to Ratchapong and confirmed that  
25 she would be departing Seattle on June 21, 2006, at approximately 8:00 p.m. Based on  
26 this call, agents established surveillance at Kang's brothel at 6:00 p.m. on June 21, 2006.  
27 At 8:04 p.m., agents observed Kang's silver Honda Odyssey depart the brothel and drive  
28 to Sea-Tac Airport. At the airport, Kang and Ratchapong exited the vehicle, Kang

1 handed Ratchapong her luggage, and she entered the airline terminal. U.S. Airways  
2 records indicate that she purchased a one-way ticket from Seattle to LaGuardia airport in  
3 New York.

4 **Calls 542, 546, 557, 591-593:** On June 15, 2006, a prostitute named "Winnie"  
5 confirmed for Kang that she would be arriving on June 19, 2006, at 10:30 a.m., on Delta  
6 Airlines. Kang asked Winnie to come "tomorrow instead," because a Korean prostitute  
7 left "this morning" and his "place" (brothel) would be very busy. Kang offered to pay  
8 any fees charged by the airline for changing the ticket. Later, Winnie advised Kang that  
9 she would arrive the following day, and that she would call Kang when she arrived. On  
10 June 16, 2006, at 2:35 p.m., Winnie called Kang and stated that she had arrived in Seattle.  
11 At 2:49 p.m, Kang told Winnie that he was "on his way" to the airport. Shortly thereafter,  
12 surveillance agents observed Kang arrive at the baggage claim area driving his silver  
13 Honda Odyssey. Kang's vehicle stopped in front of a young Asian female, Kang exited  
14 the vehicle to assist her with luggage, and they both entered the car. Kang then drove the  
15 vehicle away from the airport.

16 **Calls 675, 688-89, 694, 705, 726, 728, 730, 734-35, 740, 758:** On June 20, 2006, a  
17 prostitute named "Jenny" confirmed for Kang that she would be arriving in Seattle the  
18 following day. The next day, however, Jenny did not arrive as expected. As a result, on  
19 June 21, 2006, Kang placed a series of calls to prostitutes in an attempt to fill the opening  
20 at his brothel. Kang asked the prostitutes whether they were available to work, or  
21 whether they had any "friends" to refer. One of the prostitutes, who used a phone  
22 subscribed to in the name of "Keonok Lee," advised Kang to call "Cindy" at 213-925-  
23 5976. Kang called Cindy, and they arranged for her to fly from San Francisco to Seattle  
24 on the afternoon of June 23, 2006. After this series of phone calls, "Jenny" (the Korean  
25 prostitute who was originally scheduled to work at Kang's brothel) called Kang. She  
26 explained that she had not been answering her telephone because she was in a car  
27 accident. She said that she had "taken care of things" and that she could come to work  
28 that night. Kang told Jenny that it was "too late" because he already "arranged another

1 girl to come" work in the brothel in her place. Jenny was upset, but Kang told her that he  
2 did "not want business to be interrupted" because he had to make sure his "customers  
3 won't be disappointed." Kang assured Jenny that he would schedule her for more "work"  
4 in the future.

5 **Calls 680, 757:** On June 20, 2006, a prostitute named "Jackie" confirmed with  
6 Kang that she would be arriving in Seattle on June 22, 2006, at 9:00 a.m. Kang agreed to  
7 meet Jackie at the airport when she arrived. On June 22, 2006, at 9:36 a.m., Jackie told  
8 Kang that she just arrived at Sea-Tac Airport. Kang told Jackie that he would "be there in  
9 ten minutes." Shortly thereafter, surveillance agents observed Kang arrive at the baggage  
10 claim area driving his silver Honda Odyssey. Kang's vehicle stopped in front of a young  
11 Asian female, Kang exited the vehicle to assist her with luggage, and they both entered  
12 the car. Kang then drove the vehicle away from the airport. Based on airline and  
13 telephone subscriber records, Jackie was identified as Katheryne Au, a Chinese national.  
14 Au arrived in Seattle on a United Airlines flight from Los Angeles.

15 **Calls 771, 778-79, 789, 790:** On June 23, 2006, Kang spoke to an arriving  
16 prostitute named "Cindy," and arranged to meet her at Sea-Tac Airport. Cindy advised  
17 Kang that she was flying from Oakland, California to Seattle, arriving at 3:10 p.m. At  
18 3:40 p.m., surveillance agents observed Kang arrive at the airport driving his silver Honda  
19 Odyssey. An Asian female entered the minivan, and then Kang drove away from the  
20 airport. Through airline and telephone records, agents identified "Cindy" as Jinsuk Kim,  
21 a Korean national.

22 **Calls 886, 896, 898, 904, 967:** On June 26, 2006, Kang called a prostitute named  
23 "Susie" and asked whether she could work at his brothel beginning on July 1, 2006.  
24 Kang explained that "a Korean girl" had cancelled her schedule. Susie agreed to work,  
25 and arranged to fly to Sea-Tac Airport on July 1st. She initially wanted to purchase a  
26 ticket for a flight landing late at night, because the fare was cheaper. Kang told her to  
27 arrive earlier, stating that she should not try to save money on the air fare, because she  
28 could make up the money by "doing more customers." She later told Kang her flight

1 would land at 2:45 p.m. on July 1, 2006.

2 **Calls 940, 944, 951, 966:** On June 28, 2006, a prostitute named "Sylvia" called  
3 Kang and informed him that she needed to cancel her schedule to work at the brothel  
4 beginning July 1, 2006. She offered to find Kang a "replacement," and Kang told her that  
5 he needed someone "good." Later, Kang advised Sylvia that he found his own  
6 replacement (see below).

7 **Calls 961-62, 980-81, 986-87:** On June 28, 2006, Kang arranged for a prostitute  
8 named "Yvonne" to replace Sylvia and begin working at his brothel on July 2, 2006.  
9 Yvonne called Kang and stated that she "had been told" that Kang could give her "a  
10 schedule," referring to working at Kang's brothel. Kang explained that another prostitute  
11 cancelled, and he wanted Yvonne to arrive by July 1st. Kang explained that his brothel  
12 was open from 1:00 p.m. until 2:00 a.m. Over a series of calls, Yvonne arranged to fly  
13 from Sacramento, California, to Seattle, arriving on July 2nd in the evening. On July 2,  
14 2006, agents established surveillance at Sea-Tac Airport in anticipation of Yvonne's  
15 arrival. Agents observed a young Asian female waiting outside at the arrivals area.  
16 Shortly thereafter, Kesheng Zhu arrived driving his green Dodge Caravan (876-RMR),  
17 which is registered in his name. The Asian female entered Zhu's vehicle, and they  
18 departed the airport. Based on airline records, agents identified the female as Kim  
19 Huynh, who had arrived on Southwest Airlines flight 1330 from Sacramento, California.

20 **Call 1008:** On June 29, 2006, Kang spoke with an unknown prostitute, who stated  
21 that she was working in Houston. Kang arranged for the prostitute to work in his brothel  
22 beginning on December 11, 2006.

23 **Call 1011:** On June 29, 2006, a prostitute named "Katie" confirmed that she would  
24 arrive in Seattle on August 2, 2006. Kang thanked her for confirming.

25 **Call 1073:** On July 8, 2006, Kang scheduled an unidentified prostitute to work at  
26 his brothel between December 11 and 20, 2006.

27 **Call 1077:** On July 8, 2006, an unidentified prostitute confirmed for Kang that she  
28 would be arriving at Sea-Tac Airport at 8:50 p.m. that night.

1       **Calls 1151, 1183, 1184:** On July 10, 2006, a prostitute named "Niko" called Kang  
2 to confirm that she would arrive in Seattle the next day on United Airlines flight 1228, at  
3 approximately 1:45 p.m. When she arrived on July 11, 2006, she called Kang at TT1 to  
4 arrange for him to pick her up at the airport and transport her to the brothel. At 2:00 p.m.,  
5 surveillance agents at Sea-Tac Airport located Niko standing outside in the arrivals area.  
6 At 2:15 p.m., Kang's silver Honda Odyssey arrived at the airport and stopped in front of  
7 Niko. Niko entered the vehicle and Kang drove away from the airport.

8       **Calls 1176, 1181:** On July 11, 2006, at 1:05 p.m., an arriving prostitute named  
9 "Jenny" called Kang and stated that she was at the airport and was waiting for her  
10 baggage on carousel 18. Kang instructed her to get the baggage and meet him outside  
11 "door 18." Shortly thereafter, surveillance agents observed an Asian female waiting for  
12 baggage at carousel 18. She retrieved her baggage, and then stood outside of door 18. At  
13 1:20 p.m., Kang arrived driving his silver Honda Odyssey. The Asian female entered the  
14 car, and Kang drove the vehicle away from the airport.

15       **Calls 1195-96:** On July 12, 2006, at approximately 11:00 a.m., a prostitute named  
16 "Kelly" called Kang and asked why he was not "there" (the brothel) yet. Based on prior  
17 intercepted conversations, I am aware that Kelly had been working as a prostitute at  
18 Kang's brothel for several days, and was scheduled to depart Seattle on July 12th. Kang  
19 assured Kelly that he would be there in a few minutes. Shortly thereafter, surveillance  
20 agents observed Kang drive to the airport in his silver Honda Odyssey. Kang stopped in  
21 the departures area, and a young Asian female exited his vehicle and walked into the  
22 terminal. Kang then drove his vehicle away from the airport. Based on telephone  
23 subscriber records, and by reviewing her Washington State driver's license photograph,  
24 agents have identified Kelly as Chang Dai, a native and citizen of China.

25       **Calls 3584, 3622, 3626 (TT2):** On July 12, 2006, an arriving prostitute named  
26 "Tina" arranged for Kang to pick her up at Sea-Tac airport and transport her to the  
27 brothel. Tina stated that she was arriving on U.S. Airways flight 893, from Philadelphia,  
28 Pennsylvania, at 8:50 p.m. Surveillance agents went to Sea-Tac Airport at that time, and

1 located Tina. The agents observed Tina retrieve her luggage from the baggage carousel,  
2 and wait outside for someone to pick her up. Shortly thereafter, Kang's silver Honda  
3 Odyssey arrived at the airport. Kang exited the vehicle, assisted Tina in loading her  
4 luggage in the van, and they both entered the car. Kang then drove the van away from the  
5 airport.

6 **Call 1356:** On July 17, 2006, a prostitute named "Coco" called Kang to discuss  
7 her "schedule" (when she was going to work at Kang's brothel). Coco explained that  
8 "Nancy" made the schedule for her. Coco then handed the phone to Nancy. Kang told  
9 Nancy that Coco was scheduled to begin working at the brothel on September 2, 2006,  
10 and that Nancy was scheduled to work beginning October 21, 2006.

11 **Calls 1362, 1462, 1472 (TT1); 5455 (TT2):** On July 17, 2006, Kang spoke to a  
12 prostitute named "Angie." They confirmed that she would arrive on July 21, 2006. Kang  
13 asked her to arrive in the afternoon, between 2:00 p.m. and 3:00 p.m. Angie stated that  
14 she would call back after she booked the airplane tickets. On July 20, 2006, Angie told  
15 Kang that she would arrive the following day at 1:20 p.m. on Southwest Airlines. On  
16 July 21, 2006, at 1:34 p.m., Angie called Kang and stated that she was waiting for him at  
17 the airport outside of "door number 14." Kang said he would be there in twenty minutes.  
18 Shortly thereafter, surveillance agents observed Kang arrive at the baggage claim area  
19 driving his silver Honda Odyssey. Kang's vehicle stopped in front of a young Korean  
20 female, Kang exited the vehicle to assist her with luggage, and they both entered the car.  
21 Kang then drove the vehicle away from the airport. On August 2, 2006, at 12:02 p.m.,  
22 Kang told a customer that he was "heading to the airport to drop someone off," referring  
23 to Angie. Based on this call, agents responded to Sea-Tac Airport. Although agents did  
24 not observe Kang drop Angie off at the airport, they found her at a gate waiting to board a  
25 Southwest Airlines flight to Los Angeles.

26 **Calls 1452, 1464-67:** On July 20, 2006, Kang arranged to meet a prostitute named  
27 "Jesse" at the airport and transport her to the brothel. During one of the calls, Kang told  
28 Jesse that he was "waiting outside" to pick her up. Shortly thereafter, surveillance agents

1 observed Kang's silver Honda Odyssey in the arrivals area at Sea-Tac Airport. Kang  
2 exited the vehicle, assisted Jesse in loading her bags into the van, and they both entered  
3 the car. Kang then drove the vehicle away from the airport. On July 30, 2006, Kang  
4 informed customers that the "Chinese prostitute" (Jesse) would be leaving the brothel  
5 later that night. Based on these calls, agents established surveillance at Kang's brothel.  
6 At approximately 10:45 p.m., agents observed Kang and Jesse departing the brothel in  
7 Kang's Honda Odyssey. Kang drove directly to Sea-Tac Airport, where Jesse exited the  
8 vehicle and entered the Northwest Airlines terminal. Jesse boarded a flight from Seattle,  
9 through Minneapolis, Minnesota, to New York City. Based on airline records, agents  
10 identified Jesse as Yajie Liu, a Chinese national.

11 Call 1492: On July 21, 2006, a prostitute named "Linda" called Kang to confirm  
12 that she would work at his brothel beginning on August 12, 2006.

13 Calls 1346, 1347, 1475, 1481, 1503: On July 17, 2006, a prostitute named  
14 "Vicki" called Kang to confirm that she would arrive on July 21, 2006, at 5:15 p.m. on  
15 Alaska Airlines. As set forth below, "Vicki" was subsequently identified as Chalanthorn  
16 Malakul. On July 21, 2006, at 2:22 p.m., Malakul told Kang that she was "at the (other)  
17 airport now," and would arrive in Seattle at 5:15 p.m. At 5:20 p.m., Malakul told Kang  
18 that her plane just landed, and she was on her way to the baggage claim. As summarized  
19 below, Kang hired Liancheng Ning to transport Malakul from the airport to his brothel.  
20 However, ICE agents arrested Malakul while she was en route to the baggage claim,  
21 because she was an illegal alien who had previously been ordered deported.

22 After her arrest, Malakul made statements to immigration officers. She admitted  
23 that she was traveling to Seattle to work as a prostitute, and that she would be staying in  
24 Seattle for between ten and fourteen days. She refused to divulge the name of the person  
25 for whom she was scheduled to work, although officers observed that, shortly after her  
26 arrest, her cell phone rang repeatedly and the name "James" (Kang's nickname) appeared  
27 as the pre-programmed name of the caller.  
28

1 At 10:33 p.m., Kang called Malakul's friend "Tiffany" to find out what happened  
2 to Malakul. Tiffany explained that Malakul called her and said she had "problems with  
3 the Immigration Office." Kang said that he "sensed something went wrong." Kang asked  
4 where Malakul was, and Tiffany stated that she thought Malakul was in Tacoma (at the  
5 ICE detention center). Tiffany further stated that Malakul wanted her to contact a lawyer  
6 in Houston on Monday, July 24, 2006. Kang repeated that he had "a bad feeling about  
7 the whole thing." Kang asked Tiffany to keep him informed about the situation if she  
8 heard from Malakul. Tiffany further stated that she was currently working in "Andy's  
9 house" in Atlanta (a brothel in Atlanta, Georgia), and that she was going to New York the  
10 following day.

11 **Calls 1511-12:** On July 21, 2006, Kang called a prostitute named "Ruby" and  
12 asked whether she could work at his brothel for two days, as a replacement for Malakul.  
13 Ruby used a phone with a Seattle area code, suggesting that she may live in the Seattle  
14 area. Ruby asked whether Kang had "a lot of customers." Kang assured her that she  
15 could "make more than \$1,000 a day." Ruby stated that she would think about it and call  
16 Kang back. Ruby later advised Kang that she could not work on July 22nd, but she would  
17 "help out" on July 23rd. She stated that she could not work on July 22nd because  
18 "Aloha" does not have enough "girls" to work that day. Based on Ruby's statements, I  
19 believe she was working as a prostitute at a well-known massage parlor in Seattle named  
20 "Aloha." Ruby further stated that "Mimi" went back to Vietnam two days ago, and  
21 "Jackie" is going to California (referring to additional prostitutes at the Aloha massage  
22 parlor).

23 **Call 1558:** On July 23, 2006, Kang left a voicemail message for a prostitute named  
24 "Joy," confirming that she would begin working at his brothel on August 1, 2006.

25 **Call 1559, 1582-1584:** On July 23, 2006, Kang spoke to a prostitute named  
26 "Coco" and confirmed that she would begin working at his brothel on August 1, 2006.  
27 Coco stated that she was "working right now" (at an unspecified brothel). On July 24,  
28 2006, Coco told Kang that she had to "cancel" her schedule, but she had a friend named



1 "Nicki" who would replace her. Kang asked whether Nicki was attractive, and Coco  
2 assured him that she was. Coco stated that Nicki was currently working (at a brothel) in  
3 San Jose, California, and that she would arrive in Seattle on August 1, 2006. Kang told  
4 Coco to have Nicki call him directly.

5 **Calls 1613, 1615, 1632-33, 1660, 1688, 1699, 1701, 1705:** On July 25, 2006,  
6 Kang placed phone calls to prostitutes and brokers in an effort to find a replacement for a  
7 prostitute who cancelled her schedule at Kang's brothel. Kang told the prostitutes and  
8 brokers that he had an "opening" from July 28, 2006, through August 11, 2006.  
9 Eventually, Kang contacted a prostitute named "Sarah," who agreed to work for Kang  
10 starting July 28, 2006. Sarah later told Kang that she purchased a plane ticket, and that  
11 she would fly from Los Angeles to Seattle on July 28th, arriving at approximately 5:00  
12 p.m. On July 28, 2006, at 5:19 p.m., Sarah called Kang and stated that she just arrived in  
13 Seattle. Kang said he was on his way to the airport. Shortly thereafter, surveillance  
14 agents observed Kang arrive at the baggage claim area of the airport driving his silver  
15 Honda Odyssey. Kang's vehicle stopped in front of a young Asian female, Kang exited  
16 the vehicle to assist her with luggage, and they both entered the car. Kang then drove  
17 away from the airport. At 6:53 p.m., Kang told Kesheng Zhu that he "just got back from  
18 picking up someone," referring to having transported Sarah from the airport to his  
19 brothel. Through airline records and baggage claim receipts, Sarah was identified as  
20 Neeranutt Kaekunsri, a Thai national.

21 **Calls 1677, 1750, 1763, 1766, 1768, 1773, 1775:** On July 27, 2006, Kang  
22 confirmed with a prostitute named "Nicki" that she would arrive on August 1, 2006. On  
23 July 31, 2006, Nicki called Kang to re-confirm that she would arrive in Seattle the  
24 following day. Kang instructed Nicki to call when she landed. On August 1, 2006, at  
25 12:51 p.m., Nicki called Kang and stated that she had arrived. At 1:11 p.m., Kang told  
26 Thongyot Liamurai that he was "on the way to the airport." At 1:29 p.m., Kang told  
27 Nicki that he was "outside of the airport waiting" for her. Shortly thereafter, agents  
28 observed Kang's silver Honda Odyssey in the arrivals area at Sea-Tac Airport. Kang

1 exited the vehicle, assisted Nicki with her luggage, and they both entered the vehicle.  
2 Kang then drove away from the airport. Through airline and telephone subscriber  
3 records, agents identified Nicki as Mijin Mun a/k/a "Aena Moon," a Korean national who  
4 was an illegal alien because her temporary visa had expired. Mun arrived in Seattle on an  
5 Alaska Airlines flight from Los Angeles; she was scheduled to return to Los Angeles on  
6 August 11, 2006.

7 **Calls 1679, 1786, 1788-89 (TT1); 4164, 5465 (TT2):** On July 19, 2006, a  
8 prostitute named "Katie" called Kang to confirm that she would arrive in Seattle on  
9 August 2, 2006, at 1:00 p.m., on Continental Airlines. Kang instructed Katie to call him  
10 when she arrived. On July 27, 2006, Katie confirmed her arrival plans with Kang. Kang  
11 asked whether Katie could come earlier, but she stated that she could not. Katie further  
12 stated that she was flying to Seattle from Houston, Texas. On August 2, 2006, at 12:45  
13 p.m., surveillance agents observed Katie arrive at Sea-Tac Airport. At 1:01 p.m., Katie  
14 called Kang and stated she just arrived. Agents observed Katie retrieve her luggage from  
15 the baggage claim, and then wait outside. At 1:38 p.m., Kang told Katie that he was  
16 "close" to the airport. At 2:01 p.m., Kang told a customer that he was "at the airport  
17 waiting for the Vietnamese," referring to Katie. At 2:04 p.m., Kang told Katie that he  
18 was "there" (the airport). Shortly thereafter, agents observed Kang arrive at the airport  
19 driving his silver Honda Odyssey. Liamurai was in the front passenger seat. Katie  
20 entered the back seat of the vehicle, and Kang drove away from the airport. Through  
21 airline records, agents identified Katie as Amanda Nguyen.

22 **Call 1694:** On July 28, 2006, a prostitute named "Linda" confirmed with Kang  
23 that she would arrive in Seattle on August 12, 2006. Kang stated that "the best time" for  
24 her to arrive was between 12:00 p.m. and 1:00 p.m.

25 **Calls 1830, 1888, 1897, 1903:** On August 3, 2006, a prostitute named "Paula"  
26 confirmed with Kang that she would arrive in Seattle on August 5, 2006, at 9:30 p.m.  
27 Paula stated that she would be traveling from Los Angeles on Southwest Airlines. On  
28 August 5, 2006, at 9:27 p.m., Paula informed Kang that she arrived in Seattle. At 9:50

1 p.m., Kang told Paula that he would be "there (the airport) in five minutes." At 9:57 p.m.,  
2 Kang told a friend that he was "picking someone up at the airport." At approximately the  
3 same time, surveillance agents at Sea-Tac Airport observed Paula retrieve her luggage  
4 from the baggage claim, and then wait outside. Shortly thereafter, Kang arrived in his  
5 Honda Odyssey. Kang exited the vehicle, loaded Paula's luggage, and they both entered  
6 the vehicle. Kang then drove away from the airport.

7 **Calls 1864, 1904, 1913-24, 1927, 2024:** On August 3-8, 2006, Kang confirmed  
8 with the following prostitutes that they would arrive in Seattle to work at his brothel on  
9 the dates listed below: "Jaime" on August 19, 2006; "Jenny" on August 21, 2006;  
10 "Wendy" on August 22, 2006; "Angela" on August 28, 2006; Phatcharin Potha (a/k/a  
11 "Annie") on October 2, 2006; and "Cindy" on October 11, 2006.

12 **Call 1536, 1636, 1692, 1708, 1934, 1992, 2038:** On July 22, 2006, a prostitute  
13 named "Yumi" called Kang to confirm her "schedule" for August 11, 2006. On July 25,  
14 2006, Yumi informed Kang that she purchased an airline ticket, and would arrive in  
15 Seattle on August 10, 2006, at 10:15 p.m., via United Airlines. On July 28, 2006, Kang  
16 and Yumi re-confirmed that she would arrive the night of August 10, 2006. On August 6,  
17 2006, at Kang's request, Yumi agreed to move her arrival date up to August 8 or 9, 2006.  
18 Kang instructed Yumi to "call United (Airlines) and make the change." On August 8,  
19 2006, Yumi told Kang that she would arrive the following day at 12:30 p.m. Kang told  
20 Yumi to call when she landed. On August 9, 2006, Yumi informed Kang that she needed  
21 to delay her trip because her "period just started." Yumi said she would change her ticket  
22 and arrive at 12:15 a.m. on August 11, 2006. Kang agreed.

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**G. Wiretap Calls Between Kang and Brothel Customers.**

Kang received numerous calls from customers every day. Kang and the customers often spoke in code, referring to the prostitutes as "cars," ethnic food dishes, and "ships," among other code words. Kang and the customers also referred to the brothel in code, using words such as "office" and "restaurant." Kang often provided customers with directions to the brothel, and offered to meet them at a nearby supermarket, after which he escorted them to the brothel. Some of the most pertinent conversations between Kang and customers are summarized below. Unless otherwise noted, the calls were intercepted over TT2.

**Calls 73, 75, 77, 97:** On May 31, 2006, Kang informed several customers that he recently moved the brothel from Shaffer Avenue to a new location. Kang told the customers that the brothel's new address was 4411 11th Avenue, Seattle (in the Beacon Hill neighborhood). Kang told some customers to meet him at the nearby "Seattle Supermarket," so that he could escort them to the new brothel location.

**Call 85:** On May 31, 2006, Kang informed a customer that there were three "girls" (prostitutes) working at the brothel. The customer asked whether they were the same "girls" that were working three weeks ago. Kang stated that they were not the same, because he rotates the girls every ten days. Kang told the customer to meet him at the Seattle Supermarket because he moved the brothel to a new location.

**Calls 102, 131, 148, 197, 205:** On June 1, 2006, Kang had numerous calls with customers during which they used code words to refer to prostitutes, including "merchandise," ethnic food dishes, "cars," and "movies." Kang informed the customers that he had three prostitutes at the brothel, and specified their ethnicity as Vietnamese, Chinese, and Korean. Kang also used the code word "ship" to refer to the brothel, by informing one customer that he moved the "ship" to a new "dock" (referring to the new brothel location).

**Call 180:** On June 1, 2006, Kang spoke to a customer who explained that he recently arrived from New York and saw Kang's advertisement in the newspaper. The

1 customer asked whether he had to go to Kang's "place" (the brothel) or whether he could  
2 "take the ladies out." Kang told the customer to come to the brothel, and to meet him at  
3 the Seattle Supermarket. Kang further stated that there were "three girls," Chinese,  
4 Korean, and Vietnamese, and that each hour cost \$120.00.

5 **Calls 228, 232:** On June 2, 2006, Kang explained to customers that he opens the  
6 brothel at 12:30 p.m. and closes the brothel at 1:30 a.m.

7 **Calls 240, 274:** On June 2, 2006, Kang told a customer that he had Chinese and  
8 Korean "food" (prostitutes), and that he was going "to go pick up a Malaysian" at the  
9 airport. In a subsequent call, Kang described the three prostitutes at the brothel as "Kung  
10 Po" (Chinese), "Kim Chee" (Korean), and "Malaysian curry" (Malaysian).

11 **Call 242:** On June 2, 2006, Kang told a Caucasian customer that "the girls prefer  
12 not to provide service to my Americans." Kang would not allow the customer to visit the  
13 brothel.

14 **Call 368:** On June 3, 2006, a new Filipino customer told Kang that he "needs the  
15 girls," and that a "friend" gave him Kang's phone number. Kang refused to allow the  
16 customer to visit the brothel unless the customer's "friend" called Kang to vouch for the  
17 unknown customer.

18 **Call 370:** On June 3, 2006, a customer called Kang and asked how much he  
19 charged for "massage service." During the conversation, it became apparent that the  
20 customer wanted a legitimate massage, rather than sex. Thus, Kang told the customer to  
21 call the "massage therapist" in Chinatown.

22 **Calls 430, 657:** On June 4, 2006, two separate customers told Kang that they were  
23 coming to the brothel with a group of four customers. One of the customers told Kang  
24 that he was there "three days ago," and Kang replied that he had "all new girls now."  
25 These calls are representative of the large number of customers at Kang's brothel, and  
26 how often the prostitutes are rotated through the brothel.

27 **Calls 584, 625:** On June 4, 2006, Kang spoke with two prospective customers.  
28 During call 584, Kang refused to allow a customer to visit the brothel because the

1 customer's friend had not called to vouch for the new customer. During call 625, Kang  
2 spoke to a prospective customer and told him to "unlock" his phone number when he  
3 called Kang, referring to not using a caller identification blocking feature. Based on my  
4 training and experience, I believe these conversations illustrate that Kang takes measures  
5 to avoid law enforcement detection of his criminal activities.

6 **Call 700:** On June 5, 2006, a customer asked Kang what kind of "cars"  
7 (prostitutes) he had at the brothel. Kang replied, "BMW, Mercedes, and Lexus." The  
8 customer stated that he did not understand. Kang then explained that the "girls" are  
9 Chinese, Vietnamese, and Malaysian, and that they are "new" for that customer, meaning  
10 that they were not working at the brothel when the customer was last there.

11 **Call 759:** On June 6, 2006, a customer asked Kang whether he had any new  
12 "girls." Kang replied, "We change (the prostitutes) every ten days."

13 **Call 978:** On June 8, 2006, a customer asked Kang questions about the brothel,  
14 including the age of the prostitutes and the price of the "massage service." Kang replied  
15 that the "girls" were "in their twenties," and that the price was \$120.00. The customer  
16 complained that the price was a "bit high," and Kang replied that he did not "negotiate"  
17 the price.

18 **Call 1160:** On June 10, 2006, a customer asked Kang when the new "ship would  
19 come to shore," referring to when a new prostitute would arrive at the brothel. Kang told  
20 the customer that a new "girl" would arrive the following day, and another would arrive  
21 the day after that.

22 **Call 1385:** On June 12, 2006, a customer asked Kang what the price was for a  
23 "massage." Kang stated it was \$120.00. The customer asked why it was so expensive,  
24 and Kang replied, "Because the *girl* does the massage," implying that there would be  
25 sexual relations with the prostitutes.

26 **Call 1515:** On June 13, 2006, Kang told a customer that he had "three of them"  
27 (prostitutes), "Malaysian, Thai, and Korean." Kang explained that the Malaysian and  
28 Thai "are new from last week," referring to the fact that the prostitutes had recently begun

1 working at his brothel.

2 **Call 1570:** On June 13, 2006, a customer asked Kang whether he had any  
3 Vietnamese prostitutes. Kang stated that he only had "kim chee (Korean), pad thai  
4 (Thai), and Malaysian," but that the customer could come back for Vietnamese on June  
5 22, 2006.

6 **Calls 1637, 1667:** On June 14, 2006, Kang advised two customers that he did not  
7 want to discuss the brothel business at length over the telephone. One customer asked  
8 what the price was, and where the prostitutes were from. Kang explained that the price  
9 was \$120.00, and that the prostitutes were from Thailand, Korea, and Malaysia. The  
10 customer then asked "what kind of service the girls" provided. Kang replied that he did  
11 not want to "discuss that on the phone," but would explain it to the customer when they  
12 met in person. Another customer asked Kang what the name of the "guy" at the brothel  
13 was (referring to the brothel manager, Pengquan Xie). Kang replied, "Don't talk too  
14 much on the phone, man!"

15 **Call 1788:** On June 15, 2006, Kang told a customer that he had two prostitutes,  
16 "Pad Thai" (Thai) and Malaysian. Kang further stated that "a new one" (prostitute)  
17 would arrive the following day, for a "total of three."

18 **Call 1823:** On June 16, 2006, Kang told a customer that he had three prostitutes,  
19 from Malaysia, Thailand, and Singapore, and that the price was \$120.00 for 45 minutes.

20 **Call 1868, 1874:** On June 16, 2006, a customer named "Andy" called Kang and  
21 stated that he "just went there" (the brothel) and "enjoyed the service." Kang explained  
22 to Andy that: he gets "new girls" on the 1st, 11th, and 21st days of each month; the  
23 prostitutes "change" every ten days; the prostitutes are from "all Asian countries"; and  
24 that Kang had been in business for two years. Andy stated that he would visit the brothel  
25 again later that day. Andy later called Kang and stated that he would be at the brothel in  
26 approximately five minutes, and that he wanted the "Malaysian girl." Kang said that he  
27 was not at the brothel, but he would call "the house" to let them know Andy was coming,  
28 referring to Pengquan Xie, who was the manager of Kang's brothel at the time.

1 **Call 1983:** On June 17, 2006, Kang told a customer that "one new ship (prostitute)  
2 just arrived," and the Korean prostitute left. Kang further stated that "two new ones"  
3 (prostitutes) would arrive on June 22, 2006.

4 **Call 1989:** On June 17, 2006, Kang described the prostitutes working at his  
5 brothel as follows: "Malaysian, Thai, Bangkok; no Vietnamese, no Korean." Kang then  
6 changed the description, stating, "Malaysian, Thai, and Burma/Laos." The customer  
7 stated that he would visit the brothel later that night.

8 **Call 2056:** On June 18, 2006, a customer asked Kang what type of "beer"  
9 (prostitutes) he had at the brothel. Kang stated that he had Thai and Malaysian "beers."  
10 The customer said he would visit the brothel shortly.

11 **Call 2060:** On June 18, 2006, a customer asked Kang what type of "food" he had  
12 at the brothel. Kang stated that he had two Thai and one Malaysian (prostitutes). The  
13 customer said he only had \$100, and Kang told him that the price of \$120 is non-  
14 negotiable.

15 **Calls 634, 635 (TT1):** On June 18, 2006, a customer called Kang at TT1 and  
16 stated that he "needs a girl" (prostitute). The customer asked whether Kang would  
17 "deliver one" to his place. Kang declined, telling the customer, "Sorry, we do not do  
18 delivery."

19 **Call 2207:** On June 20, 2006, Kang told a customer that he had three "candidates"  
20 (prostitutes): "One Malaysian, one Thai, and one Golden Triangle." The customer asked  
21 Kang whether "Golden Triangle" meant Korea. Kang replied, "no," and told the  
22 customer to "come over and check it out." During subsequent intercepted calls, Kang  
23 described the third prostitute as being both "Golden Triangle" and from "Laos."

24 **Call 2215:** On June 20, 2006, Kang spoke with a customer named "Andy." Kang  
25 told Andy to "unblock" his phone number, and said that he "can't talk much if no phone  
26 number is shown." Andy asked Kang whether he gets "new girls" (prostitutes) on the 1st,  
27 11th, and 21st days of each month. Kang confirmed this, and told the customer that a  
28 new Korean prostitute and a new Vietnamese prostitute would arrive "the day after



1 tomorrow." Kang further stated that he "always has three girls."

2 **Calls 2254, 2274:** On June 21, 2006, Kang told customers that he had two  
3 prostitutes working, one Thai and one Malaysian. Kang further stated that he would have  
4 a "new one" the following day who was "Vietnamese-Chinese."

5 **Call 2332:** On June 22, 2006, a customer asked Kang whether he could "have a  
6 look first," referring to visiting the brothel and inspecting the prostitutes. Kang agreed to  
7 allow the customer to visit the brothel for that purpose.

8 **Calls 2352, 2361:** On June 22, 2006, Kang told customers that a "new  
9 Vietnamese girl" just arrived, and that a "new Korean" (prostitute) would arrive the  
10 following day.

11 **Calls 2389, 2423:** On June 22, 2006, a customer addressed Kang as "Captain,"  
12 and asked whether "the new torpedoes (prostitutes) will be launched tomorrow." Kang  
13 confirmed that a new prostitute would arrive the next day at 3:00 p.m. On June 23, 2006,  
14 at 3:15 p.m., the customer called Kang to confirm whether "three torpedoes" were  
15 available. Kang replied that they would be available in one hour.

16 **Calls 2427, 2469, 2472:** On June 23, 2006, Kang told several customers that he  
17 had three prostitutes working, who were Vietnamese, Korean, and Thai. During one call,  
18 Kang described the prostitutes as "kimchee (Korean), pad thai (Thai), and Bon Mo Fui  
19 (Vietnamese)." Kang told another customer that the prostitutes were "young" and "all  
20 new."

21 **Call 2587:** On June 24, 2006, a customer named "Andy" asked Kang whether the  
22 "new girls" had arrived. Kang replied, "Yes, Korean, Thai, and Vietnamese, all new."  
23 Andy asked how long the prostitutes would be working at the brothel. Kang warned  
24 Andy not to ask the girls "too many questions pertaining to work," because the prostitutes  
25 will then ask Kang why the customer has so many questions. Based on my training and  
26 experience, I believe that Kang was explaining to Andy that the prostitutes become  
27 suspicious of customers who ask too many questions, fearing that they may be undercover  
28 law enforcement officers.