

1 **Call 2808:** On June 27, 2006, a customer asked Kang whether he had a "new one"
2 (prostitute). Kang asked when the customer had last visited the brothel, and the customer
3 said he was there two days earlier. Kang replied, "They are the same, but a new one will
4 come on July 1st."

5 **Call 2817:** On June 27, 2006, Kang told a customer that he has "three girls
6 tonight," and described them as an "international buffet."

7 **Call 2907:** On June 28, 2006, a customer asked Kang whether there were any
8 other customers at the brothel. Kang stated that there was one Vietnamese customer there
9 at the time. The caller stated that he would visit the brothel later, because he did "not
10 want to be seen." Kang assured the caller that the customer at the brothel did not know
11 him, and that he was "in the room" with a prostitute so he would not see the caller. The
12 caller agreed to "come up" to the brothel.

13 **Call 2922:** On June 28, 2006, a customer asked Kang whether he ran a "massage
14 place." When told by Kang that the price was \$120.00 "per hour," the customer said that
15 was "expensive" and asked what type of "service" was provided. Kang replied,
16 "everything," referring to sexual activity. The customer asked whether "they (prostitutes)
17 go out or stay in," and Kang told the customer to "come over" to the brothel. The
18 customer asked whether it was okay for him to bring another person with him. Kang
19 replied, "no problem," and encouraged the customer to bring up to five additional
20 customers with him. When asked whether it was "absolutely safe," Kang assured the
21 customer that it was, meaning that the customer would not be arrested or otherwise
22 detected by law enforcement.

23 **Call 2956:** On June 29, 2006, a customer asked Kang, "How is everything?" Kang
24 told the customer, "It's still the same," referring to the fact that the same prostitutes were
25 working at the brothel. Kang said new prostitutes would arrive on July 1st and July 2nd.

26 **Call 3011:** On July 5, 2006, a customer asked Kang what type of "seafood"
27 (prostitutes) he had. Kang stated there was Vietnamese, Chinese, and Korean.
28

1 Call 3070: On July 6, 2006, a customer asked whether "the Vietnamese girl" was
2 still at the brothel. Kang stated that she was. The customer said he would be at the
3 brothel in five minutes.

4 Call 3072: On July 6, 2006, a customer asked Kang whether there was any "new
5 merchandise" (prostitutes). Kang stated that "they are still" Chinese, Vietnamese, and
6 Korean. The customer asked Kang to tell the "Vietnamese" to wait for him.

7 Calls 3103, 3115: On July 7, 2006, a customer asked Kang whether the "listing
8 was delicious." Kang said the "listing" was "kimchee, bonmofui, and kung pao," and
9 later clarified that he meant the prostitutes were Korean, Vietnamese, and Chinese.
10 Another customer asked Kang which "course" (prostitute) was better. Kang stated that he
11 would pick the Chinese prostitute because "it's tender."

12 Calls 3198, 3210: On July 8, 2006, a customer told Kang that he left his wallet in
13 "the Chinese girl's room ten minutes ago." Kang stated that "she is working right now"
14 (servicing a customer) but that he would check "after she's done." Later, Kang advised
15 the customer that he could not find the wallet.

16 Calls 3220, 3324: On July 8, 2006, a customer called Kang and identified himself
17 as one of Kang's "old customers in Portland," referring to when Kang operated a brothel
18 in Portland. The following day, the customer called back to arrange to visit Kang's
19 brothel. Kang told the customer that it was the "same price as Portland" and that
20 "satisfaction is guaranteed."

21 Call 3243: On July 8, 2006, one of Kang's regular customers asked whether he
22 could bring an "American" (Caucasian) friend to the brothel. Kang refused, stating, "The
23 girls don't like American." Based on my training and experience, I believe that Kang
24 rejects Caucasian customer because he fears they may be undercover law enforcement
25 agents.

26 Call 3401, 3429: On July 10, 2006, a customer asked Kang when the "new
27 shipment" (new prostitutes) would come in. Kang stated that two new prostitutes (who
28 were Korean and Chinese) would arrive the following day, and that a new Thai prostitute

1 would arrive in two days. Later that day, Kang told another customer that he had "a tall
2 Korean and big booty Chinese" prostitute.

3 **Call 3500, 3514, 3542:** On July 11, 2006, Kang told a customer that he was in the
4 process of picking up a Chinese prostitute at the airport. Later that day, Kang told
5 customers that he had two new prostitutes, who were Chinese and Korean, and that he
6 also had a third prostitute, who was Taiwanese.

7 **Call 3639:** On July 13, 2006, Kang told a customer named "Andy" that he had
8 "three new girls," who were from China, Korea, and Thailand.

9 **Call 3792:** On July 14, 2006, a customer asked Kang whether the "massage
10 service" included sexual activities. Kang scolded the customer for raising that subject
11 over the telephone, and said it was "difficult" to answer that question. The customer
12 asked whether this topic should be discussed when he arrived at the brothel, to which
13 Kang responded in the affirmative.

14 **Call 3982:** On July 16, 2006, Kang told a customer that he had three prostitutes
15 who were Korean, Chinese, and Thai. Kang further stated that the Korean was "new."

16 **Call 3988:** On July 16, 2006, a customer asked Kang whether it was "safe" to
17 come to the brothel. Kang assured him that it was, but also stated that the customer had
18 the option "not to come" if he was worried about it (being arrested).

19 **Call 4163:** On July 19, 2006, a customer asked what types of prostitutes Kang had
20 available that day. Kang stated that he had "Kimchee" (Korean), "Pad Thai" (Thai), and
21 "Dimsum" (Chinese). The customer asked when "Bun Mo Fui" (Vietnamese) would be
22 available. Kang stated, "maybe next month," but explained that Vietnamese girls are
23 "tricky" because they "don't show up" and they "lie too much."

24 **Call 4191:** On July 19, 2006, a customer asked whether Kang's "place" offers
25 "shoot the canon service" (sexual intercourse). Kang scolded the customer for asking that
26 question over the telephone, and suggested that the customer find a more "decent way" to
27 ask the same thing. The customer apologized to Kang.
28

1 **Call 4275:** On July 20, 2006, a customer asked whether Kang had any Vietnamese
2 prostitutes. Kang stated that he might have some next month, but for now he had Korean,
3 Chinese, and Thai prostitutes, who were "the same girls as last week." The customer
4 stated he would check back with Kang for a Vietnamese prostitute in the future.

5 **Call 4306:** On July 20, 2006, a customer named "Aklilu" called Kang and
6 reminded him that he was "the African black guy." Aklilu told Kang that he had a friend
7 getting married, and asked whether Kang "did bachelor parties." Kang stated that he did
8 not. Aklilu then asked whether Kang had a "better looking lady," because he was not
9 happy with the one he had about two or three weeks ago. Aklilu reminded Kang that he
10 was charged \$150.00 instead of \$120.00 because he was black. Kang assured Aklilu that
11 he has "a better one" (prostitute) this time. Aklilu stated he would be at the brothel later
12 that night. He again asked whether Kang would "hook him up" with "private dancers"
13 for the bachelor party. Kang stated, "We will talk when I see you. Don't talk on the
14 phone."

15 **Call 4363:** On July 21, 2006, Kang advised a customer that he had a Thai
16 prostitute, "a new Chinese," and "after 2:00 p.m. another new Korean will arrive." The
17 customer complained that he "had the Thai three times already." Kang assured the
18 customer that the "Thai girl will leave tomorrow."

19 **Call 4371, 4391:** On July 21, 2006, Kang told customers that he had "three new
20 ones -- Chinese, Korean, and Thai," and that they were "pretty good." One customer
21 asked for more information about the Chinese prostitute. Kang stated that she was
22 "young" and "from Beijing." The customer agreed to come to the brothel later that night.

23 **Calls 4415, 4417:** On July 21, 2006, a new customer called and asked Kang
24 whether he could come to the brothel. Kang asked whether he had been to the brothel
25 before. The customer explained that he had not, but he got the phone number from his
26 friend named "Santao." Kang refused to allow the new customer to visit the brothel until
27 Santao called to vouch for him. Approximately twelve minutes later, Santao called Kang
28 on behalf of the new customer. Kang told Santao to have the customer go to the old

1 brothel location, and then call Kang. I believe that this was a test by Kang to make sure
2 Santao was, in fact, an old customer who knew the previous location of the brothel.

3 **Call 4551:** On July 23, 2006, a customer referred to Kang as "Captain," and asked
4 when "the new fishes (prostitutes) are coming." Kang stated that they were already there,
5 and that "one is salmon and the other is tuna, which are good and fresh." Kang told the
6 customer to "get some wasabi and they are ready to eat." The customer stated that he
7 would try to stop by later that night.

8 **Call 4552:** On July 23, 2006, a customer asked Kang whether he had any
9 Vietnamese "girls" (prostitutes). Kang stated that he currently had one Korean and one
10 Chinese prostitute, and that he may get a Vietnamese prostitute next month. Kang
11 described the prostitutes as "young, about 20 or 21." The customer stated that he visited
12 Kang's brothel about six months ago. Kang told him that he still charges \$120.00.

13 **Calls 4635, 4641, 4643:** On July 24, 2006, a customer asked Kang whether "his
14 friend" could be with "both girls simultaneously." Kang asked what ethnicity the friend
15 was. The customer stated that the friend was Asian. Kang said he would "ask the girls"
16 whether "they would do it." Later, Kang advised the customer that the "Korean said
17 okay," but the "Chinese said no."

18 **Call 4711:** On July 25, 2006, at 1:19 a.m., Kang told a customer that "Little
19 Beijing (a Chinese prostitute) can't take anymore customers" because "it hurts."

20 **Call 4757:** On July 25, 2006, a customer asked Kang whether he had any
21 Vietnamese prostitutes. Kang stated that he would have a "Vietnamese girl" on August 2,
22 2006.

23 **Call 4827:** On July 26, 2006, a customer asked whether Kang had any "new girls."
24 Kang asked when the customer had last been at the brothel. The customer stated he was
25 there "one week ago," when Kang had "a Thai and a Korean." Kang stated that he had "a
26 Chinese and a Korean now," and that "they are both young and good." Kang assured the
27 customer that he "changed the girls" since the last time the customer was at the brothel,
28 because he "changes girls on the 1st, 11th, and 21st of each month." Kang encouraged

1 the customer to "come check them out."

2 **Call 4834:** On July 26, 2006, Kang told a customer that he would have a new Thai
3 prostitute on July 28, 2006, and "another new one" on August 2, 2006.

4 **Calls 4891, 4914, 4978, 5077:** On July 27 and 28, 2006, Kang told customers that
5 a new Thai prostitute would arrive on July 28, 2006, and that the Chinese prostitute was
6 leaving the brothel on July 30, 2006. On July 29, 2006, a customer asked whether the
7 "new merchandise" arrived. Kang confirmed that a new Thai prostitute arrived and that
8 she was "pretty good."

9 **Call 4898:** On July 27, 2006, a customer complained to Kang that although the
10 "Chinese girl" had a very good figure and was very "pretty, sweet, and young," she
11 "lacked emotion." Kang told the customer that was a good thing.

12 **Call 4994:** On July 28, 2006, Kang explained to a new customer that "the first
13 time" he visited the brothel Kang would meet him "in the market," referring to the Seattle
14 Supermarket, the location at which Kang frequently meets customers prior to escorting
15 them to his brothel. Kang further stated, "The second time you can come straight" (to the
16 brothel). Kang also commented, "I don't like to say too much on the phone."

17 **Calls 5112, 5131:** On July 29, 2006, Kang told customers that "the Chinese girl"
18 (at his brothel) was leaving on July 30th, and "the Korean" was leaving on July 31st.
19 Kang further stated that a new Vietnamese prostitute would arrive on August 1st, and a
20 new Korean prostitute would arrive on August 2nd.

21 **Call 5344:** On July 31, 2006, a customer who was looking for the brothel told
22 Kang that he was "at the old place in back of the school." Kang told the customer that the
23 brothel had been there "one year ago," but had since moved to Beacon Hill. Kang told
24 the customer to go to the Seattle Supermarket and call back.

25 **Call 5369:** On July 31, 2006, Kang told a customer that "the new Thai girl"
26 arrived the day before, and that she was "good."

27 **Call 5427:** On August 1, 2006, a new customer asked Kang what the price was for
28 a "massage." Kang stated it was \$120.00. The customer complained that was too

1 expensive, and stated that he usually paid only \$60.00 for a massage. Kang explained that
2 "the massage includes a girl" (sex) and asked whether the customer had ever "been to a
3 place like this (brothel) before." The customer then terminated the call.

4 **Call 5455:** On August 2, 2006, Kang told a customer that "a new Korean" arrived
5 the day before, and "a new Vietnamese" would arrive later that afternoon.

6 **Call 5531:** On August 2, 2006, Kang provided a customer with directions to the
7 brothel. Kang stated, "The house number is 4411," referring to the brothel address of
8 4411 11th Avenue South, Seattle.

9 **Call 5642:** On August 4 and 5, 2006, Kang advised numerous customers that he
10 had "new" Vietnamese, Korean, and Thai prostitutes.

11 **Call 1973 (TT1):** On August 7, 2006, a customer told Kang that he heard
12 "information from a friend" that made him wary of visiting Kang's brothel. Kang assured
13 the customer that he had been "doing this for two years" and that he pays "a protection
14 fee." Kang stated that he would not have been "able to last until today" if there was a
15 problem. The customer stated he was concerned that "the police may come and arrest"
16 Kang and his customers at the brothel. Kang ended the discussion by telling the customer
17 that he was not trying to "convince" him to visit the brothel.

18 **Call 5915:** On August 7, 2006, a customer asked Kang what types of "vegetables"
19 (prostitutes) were at the brothel. Kang stated he had "one Vietnamese-Chinese, one Thai-
20 Chinese, and a brand new Korean" would arrive on August 9, 2006.

21 **Call 5922:** On August 7, 2006, a customer asked Kang when the current "girls"
22 were leaving the brothel. Kang stated that "all three of them" would leave (depart
23 Seattle) on August 11, 2006.

24 **H. Wiretap Calls Between Kang and Coconspirators In Other Cities.**

25 Since May 31, 2006, Kang has used TT1 to communicate with brothel operators
26 and brokers located throughout the United States. These calls are not summarized herein,
27 because some of the interceptees may be the subjects of ongoing law enforcement
28 investigations. During these calls, Kang ordered and attempted to order prostitutes from

1 brokers in Los Angeles and New York; Kang referred prostitutes to brothel operators in
2 other cities; Kang contacted brothel operators in other cities to refer customers to the
3 brothels (when his local customers were traveling); and Kang discussed with other brothel
4 operators their respective brothel businesses.

5 **V. PENGQUAN XIE'S ROLE AS THE MANAGER OF KANG'S BROTHEL.**

6 Pengquan Xie worked as the manager of Kang's brothel on a daily basis between
7 mid-January 2006, and mid-July 2006. As described above, Xie was working as the
8 manager of Kang's brothel when CI#4 and CI#5 visited the brothel on the following
9 dates: January 18, 2006, January 22, 2006, April 27, 2006, and May 17, 2006.

10 Subsequent wiretapped calls indicate that Xie managed Kang's brothel every day until he
11 left Seattle in mid-July 2006. Some of the most pertinent intercepted conversations
12 involving Xie are summarized below. Unless otherwise noted, the calls were intercepted
13 over TT1.

14 **Calls 54, 86:** On June 1, 2006, Kang asked Xie if he had the "covers" (condoms).
15 Xie said he did. Kang told Xie to "bring them (to the brothel) tonight." On June 2, 2006,
16 Kang instructed Xie to "refill the covers in each room."

17 **Call 97:** On June 2, 2006, Xie told Kang that the customer Kang "just brought up"
18 to the brothel wanted to pay only \$100.00, not the normal \$120.00 fee. Kang stated that
19 there is "no way," and that it should not even "be a question."

20 **Call 202:** On June 6, 2006, Kang told Xie that a "person" (customer) was coming
21 to the brothel in five minutes, and that Kang was waiting for the customer to "show up."
22 Xie confirmed for Kang that the last customer had left the brothel. Xie also informed
23 Kang that the "Korean girl" (prostitute) wanted to stop working at the brothel because
24 "she's too tired." Xie said that he told the prostitute to wait until Kang returned to the
25 brothel, so she could discuss the matter directly with Kang.

26 **Call 283:** On June 8, 2006, Kang asked Xie whether "they" (customers) left yet.
27 Xie replied, "no." Kang advised Xie that "more people" (customers) would be coming to
28 the brothel, and that Kang would go to the supermarket and wait for them.

1 Call 320: On June 10, 2006, at 2:20 a.m., Xie called and asked Kang whether he
2 should "close or not." Kang told Xie to "close" (the brothel).

3 Call 325: On June 10, 2006, Kang asked Xie whether the "Malaysian girl" was
4 working or not, referring to whether a Malaysian prostitute was currently servicing a
5 customer. Xie stated that she was not working, and put the Malaysian prostitute on the
6 telephone. Kang and the prostitute discussed a cellular telephone plan Kang was
7 considering purchasing for her.

8 Call 367: On June 11, 2006, Xie called Kang and stated that a customer of the
9 "Thai girl" had an "argument and didn't pay." Xie put the customer on the phone. The
10 customer explained to Kang that the prostitute only gave him "twenty minutes" and then
11 stopped before he was satisfied. Kang told the customer to give the phone back to Xie.
12 Kang then told Xie to put the "Thai girl" on the phone. She then gave her account of the
13 incident. Kang told her to stop talking to the customers so much, and "just do it" (engage
14 in sex with the customers).

15 Call 371: On June 11, 2006, Kang asked Xie how many "people" (customers)
16 were waiting in the brothel. Xie stated that "four people" were waiting and "three people
17 are doing," indicating that three customers were being serviced by the prostitutes. Based
18 on this conversation, I believe that a total of seven customers were in the brothel at that
19 time.

20 Call 567 (TT1); 1790, 1792 (TT2): On June 15, 2006, Pengquan Xie advised
21 Kang that there was a black customer at the brothel, and one of the prostitutes refused to
22 service him. Kang said that he would "talk with the girl." Shortly thereafter, the black
23 customer used Pengquan Xie's cellular telephone to call Kang at TT2. Kang told the
24 customer that one of the prostitutes ("the tall one") only has sex with Asian customers.
25 However, Kang stated that the other prostitute ("the short one") will "do it with him"
26 (have sex), but only for the higher price of \$150.00. The customer agreed to pay \$150.00.
27 Kang then asked the customer to hand the phone to Xie. Kang told Xie to ask the
28 prostitute if she would service the black customer for \$150.00. Xie told Kang to talk to

1 the prostitute directly, and he handed the phone to the prostitute. Kang asked her if she
2 would service the black customer for \$150.00, and she agreed to do so. Approximately
3 37 minutes later, the customer called Kang and thanked him for the "favor." Kang told
4 the customer to call in advance next time.

5 Call 596: On June 16, 2006, Kang advised Xie that "the girl is here" (referring to a
6 prostitute Kang just picked-up at Sea-Tac Airport), and that she would be "there" (the
7 brothel) in twenty minutes.

8 Call 608: On June 16, 2006, Xie told Kang that he was concerned about a
9 Taiwanese customer who just left the brothel. Xie asked how the customer got Kang's
10 phone number. Kang explained that the customer saw it in Kang's advertisement in the
11 newspaper. Xie said that the customer was "strange," because "he asked many questions,
12 even things he shouldn't be asking, he asked a lot!" Kang assured Xie that "it's okay,"
13 because he knew the customer. Kang agreed, however, that the customer asked too many
14 questions. Xie continued to express concern, explaining: "He asked the girls many
15 questions, too . . . [like] how many customers per day. So many questions! He even
16 asked how many rooms are there, [and] how big are the rooms." Xie advised Kang, "Just
17 be careful." Kang replied, "I know." Based on this conversation, and on my training and
18 experience, I believe that Xie was concerned that the Taiwanese customer may be an
19 undercover police officer.

20 Call 636: On June 18, 2006, Xie told Kang that they needed mouth wash and bath
21 wash for the brothel. Kang said he would purchase more the following day.

22 Call 791: On June 23, 2006, while Kang was driving to Sea-Tac Airport to meet
23 an arriving prostitute, he called Xie and stated that "the girl" would arrive in fifteen
24 minutes. Kang instructed Xie to "go clean up the room" at the brothel where the
25 prostitute would stay.

26 Calls 803, 806-07 (TT1); 2482, 2484 (TT2): On June 23, 2006, Kang had a series
27 of conversations with Xie, Zhu, and a customer about a Chinese man who was sitting in a
28 car in front of the brothel. Initially, they suspected that the man may be an undercover

1 police officer, but they later determined he was one of the brothel customers. When Xie
2 first advised Kang about the situation, Xie stated that one of the customers alerted him
3 about a "strange" Chinese man who was sitting in a car in front of the brothel. Xie was
4 concerned because he saw the "person inside the car" say something to a customer exiting
5 the brothel. Xie urged Kang to find out what happened directly from the customer. Kang
6 agreed to do so, and instructed Xie not to talk about this matter "in front of the girls"
7 (prostitutes). During a later call, Kang asked Xie whether the person was still sitting in
8 the car outside of the brothel. Xie said that he was. Kang told Xie to go look at the
9 person to see if Xie recognized him as a customer. Xie told Kang he did not recognize
10 the man. Kang said he would be there shortly.

11 Kang then used TT2 to call the customer who reported the situation to Xie. The
12 customer warned Kang that there was a "strange" Chinese man sitting in a parked car
13 outside of the brothel, who was talking on the phone and reading a newspaper. The
14 customer said he felt "strange" about it and he did not "go in" to the brothel. Kang
15 assured the customer that anyone outside the brothel would be a customer, and that if
16 "someone is watching" (law enforcement officers) they would not "appear in front of the
17 house." The customer told Kang that the Chinese man asked him "if it was good inside."
18 The customer said that he replied, "I don't know what you're talking about." Kang told
19 the customer that he would check it out. Later that day, Kang called the customer and
20 told him to "chill out," because the Chinese man in the car was just another customer.
21 Zhu subsequently called Kang and asked whether "anything was the matter." Kang
22 assured Zhu that "the person is a customer."

23 Call 895: On June 26, 2006, Kang received a call from a customer over TT2 (call
24 2768). The customer told Kang that he was heading to the brothel, but was \$11.00 short
25 on the \$120.00 fee. Kang told the customer to borrow \$20 from "my guy there" (Xie) and
26 pay him back "next time." Immediately thereafter, Kang used TT1 to call Xie, and stated
27 that "the Indian" (the customer) would be at the brothel soon. Kang instructed Xie to
28 give the customer \$20.00 "if he does it" (has sex with a prostitute). Kang said he would

1 pay Xie back later.

2 **Call 1021:** On July 6, 2006, Xie called Kang and asked him to come to the brothel
3 to handle a situation involving two customers who did not bring money with them.

4 According to Xie, the customers asked whether they could pay "next time when they
5 come over." Kang stated that he would come talk to the customers.

6 **Call 1042, 1050:** On July 7, 2006, Xie told Kang that "two of them" (prostitutes)
7 wanted pizza for dinner. Kang ordered the pizza, and told Xie to pay for it if it arrives at
8 the brothel before Kang.

9 **Call 1128:** On July 9, 2006, Xie advised Kang that the "Vietnamese girl" had to
10 leave that day, because her close friend passed away. Xie stated that the prostitute was
11 flying "home" at 4:30 p.m. that afternoon. Xie asked Kang to "come home" (to the
12 brothel) "in a hurry" (so that Kang could transport the prostitute to the airport). Based on
13 this call, surveillance agents went to Sea-Tac Airport. At approximately 4:30 p.m., agents
14 observed Kim Huynh (who had previously been identified as "Yvonne") waiting to board
15 a Southwest Airlines flight to Sacramento, California. According to Southwest Airlines
16 records, Huynh was originally scheduled to depart Seattle on July 10, 2006, but requested
17 to leave one day earlier.

18 **VI. ZHENG QU'S ROLE AS THE MANAGER OF KANG'S BROTHEL.**

19 For reasons unknown, Pengquan Xie stopped working as Kang's brothel manager
20 in mid-July 2006. After several failed attempts to hire a replacement manager, Kang
21 ultimately hired defendant Zheng Qu. The following are summaries of pertinent wiretap
22 calls regarding Kang's search for a new manager, and hiring of Qu. Unless otherwise
23 noted, the calls were intercepted over TT1.

24 **A. Kang's Employment Search for a New Brothel Manager.**

25 **Call 1124:** On July 9, 2006, Kang called the "Fortune Services Company," an
26 employment agency in Los Angeles. Kang spoke to an unidentified Asian female. Kang
27 explained that she previously referred Pengquan Xie to help him "see the house," and
28 Kang asked whether there was anyone else who could do that for him in Seattle. The

1 female agreed to find someone to replace Xie.

2 **Calls 1231-32:** On July 12, 2006, Kang called two additional employment
3 agencies in Los Angeles, in an effort to find a replacement for Pengquan Xie. Kang
4 stated that he was calling from Seattle and needed someone to work for him. He
5 explained that he ran a "massage center," and wanted an Asian male, age 35-45, who
6 knows "at least some English." Kang further stated that the employee's responsibilities
7 would be "to take care of the ladies," including cooking and cleaning. Kang offered a
8 salary of \$2,500 for the first month, during which Kang stated he would train the
9 employee. Kang stated that the salary would increase to \$2,800-\$3,000 after that. Kang
10 explained that "meals and lodging" are included, and that the employee will live in his
11 own room. Kang stated that he needed to find a person within one week.

12 **Call 3672 (TT2):** On July 13, 2006, Kang spoke with a customer named "Guam"
13 who stated that he "changed his mind" and did not want to work as the manager of
14 Kang's brothel. Guam explained that he did not want to cook, so he did not want the job.
15 Guam suggested that Kang get a woman to manage the brothel, because "they don't mind
16 cooking." Kang said a woman would not be able to handle the customers if they are
17 "drunk," so he wanted a male manager. Later that day, Kang told defendant Thongyot
18 Liamurai that "the guy (Guam) changed his mind," so he had to "find another one" to
19 manage the brothel.

20 **Calls 1351, 1359, 1361:** On July 17, 2006, Kang called three more employment
21 agencies looking to hire a replacement for Xie. Kang told one of the agencies that he did
22 not care whether the employee had a social security card.

23 **Calls 1327, 1366-67, 1372, 1377, 1379, 1401, 1410, 1412:** On July 15-18, 2006,
24 Kang spoke with the Li Employment Agency, which attempted to refer an Asian male
25 named "Wang" from Los Angeles to Seattle to work for Kang. Kang offered to pay for
26 the plane ticket, as long as Wang worked for at least three months. Kang assured the
27 employment agent that his "place" (brothel) was "safe" (from law enforcement detection).
28 The agent told Kang that he was required to pay a \$100 referral fee, to which Kang

1 agreed. Kang then spoke to Wang, and told him the job duties would include cooking,
2 cleaning, and dealing with the customers. Kang stated that Wang would not get any days
3 off, but that the work was not "hardcore." Wang advised Kang that he would arrive in
4 Seattle on July 18, 2006, at 4:41 p.m. Kang went to the airport to meet Wang, but Wang
5 never arrived. Kang called the employment agency to complain, and the agent told Kang
6 that at the last minute Wang received a call "from a friend," who stated that "something
7 happened to the place" (Kang's brothel) in the past, so Wang did not "dare" go work
8 there. (This may be a reference to the raid of the Apple Spa in 2004.) Kang was angry,
9 and expressed frustration to the employment agent.

10 **Calls 1419-21, 1433:** On July 19, 2006, Kang received a call from another
11 employment agent, who stated that an employee named "Lee" was making arrangements
12 to fly to Seattle and work as Kang's brothel manager. Kang briefly spoke to Lee about
13 his possible flight itinerary. Kang then received a call from Lee's sister, who wanted to
14 know more about the "job description." Kang stated that Lee would be cooking at a
15 massage parlor, and that there are three girls. The sister explained that Lee "just came"
16 from China and "doesn't know much." Shortly thereafter, Kang received a call from the
17 employment agent, who stated that Lee was "afraid of going" to Seattle now, because Lee
18 talked to his sister. The agent explained that Lee was in the process of getting legal
19 status in the United States, and was afraid of being arrested. Kang stated that if there
20 were arrests, it would be his (Kang's) problem, and not Lee's. Kang later spoke to the
21 same employment agent, who put another prospective employee on the phone with Kang.
22 Kang told the employee that the job would entail him cooking and cleaning "for the
23 girls." The employee asked whether it was "dangerous," referring to the possibility of
24 being arrested. Kang stated that if there was any danger, it has "nothing to do with others,
25 but me." The employee said he would think about it and call Kang back, but he never
26 called.

27 **Calls 1455, 1458:** On July 20, 2006, Kang received a call from an employment
28 agent, who stated that he had an employee named "John" who was willing to take the job

1 as Kang's new brothel manager. As set forth below, "John" was subsequently identified
2 as defendant Zheng Qu. Qu then got on the phone with Kang. Kang explained that he
3 ran a massage parlor with "three girls," and set forth Qu's job responsibilities, including
4 cooking and cleaning for the "girls." They agreed that Kang would start Qu's pay at
5 \$2,500 per month, and then raise it to \$3,000 per month. Kang stated that he would pay
6 Qu on the first and sixteenth day of each month, and that Qu would have his own room in
7 which to live at the brothel. Qu later called Kang to tell him that he would fly from Los
8 Angeles to Seattle, arriving on July 22, 2006, at 5:15 p.m. Kang told Qu to call him when
9 he arrives, so that Kang could meet him at the airport.

10 **B. Wiretap Calls Concerning Zheng Qu.**

11 **Calls 1517, 1529, 1530, 1532, 1541:** On July 22, 2006, Kang arranged to meet Qu
12 at Sea-Tac Airport. Qu confirmed that he would arrive on a plane from Los Angeles at
13 5:15 p.m. At 5:20 p.m., Qu called Kang and stated that he had arrived, and was waiting
14 for his luggage. At 5:30 p.m., surveillance agents observed Qu waiting outside at the
15 arrivals area. Qu was identified through airline records, which listed him as a passenger,
16 by the tags on his luggage, which listed his name. At 5:50 p.m., agents observed Kang
17 arrive at the airport in his silver Honda Odyssey. Qu entered the vehicle, and Kang
18 departed the airport. The following day, July 23, 2006, Kang told a friend that he had "a
19 new person from Los Angeles" helping him at the brothel, and that Kang was "training"
20 the "new guy" (referring to Qu).

21 **Call 1542:** On July 23, 2006, at 2:45 a.m., Qu told Kang that two people
22 (customers) were knocking on the brothel door, asking for Kang. Kang advised Qu to tell
23 them "the place is closed." Qu then repeated to the customers that the place was closed,
24 and said they could "come back tomorrow."

25 **Call 1637:** On July 26, 2006, Kang told a friend that there were "a whole bunch of
26 customers" (at the brothel), and that he was "busy training the new guy," referring to Qu.

27 **Call 5455 (TT2):** On August 2, 2006, Kang told a customer that he (Kang) was at
28 the airport, but "someone was there (at the brothel) to open the door" for the customer,

1 referring to Qu being present at the brothel and working as the manager.

2 Call 1797: On August 2, 2006, Kang told a friend that "the new person (he) just
3 hired does not cook well," referring to Qu. Kang stated that he had to show Qu "what to
4 do."

5 Call 1930: On August 6, 2006, Kang told an associate that he recently hired
6 someone "to take care of the store," referring to Qu's job as the new brothel manager.
7 Kang stated that Qu's "working hours" were noon to 2:00 a.m., and that the job included
8 "cooking and cleaning."

9 Call 1949: On August 7, 2006, Kang called the employment agency that referred
10 Qu. Kang stated that he was "not satisfied" with Qu, and wanted "a new person." The
11 employment agent agreed to find someone else to refer to Kang. On the same day, Kang
12 called other employment agencies in an effort to find a replacement for Qu.

13 C. CI#4's Visit to Kang's Brothel on August 4, 2006.

14 On August 4, 2006, at approximately 9:30 p.m., CI#4 visited Kang's brothel for
15 the purpose of identifying Qu as the brothel manager. CI#4 called Kang at TT2 to
16 arrange the visit, although Kang was not present when CI#4 arrived at the brothel. When
17 he arrived, Qu opened the door and let CI#4 inside. CI#4 subsequently identified Qu by
18 reviewing a surveillance photograph of Qu taken at Sea-Tac Airport on July 22, 2006.
19 According to CI#4, there were two prostitutes working at the brothel. Qu pointed out the
20 prostitutes and stated, "We have Thai and Korean." CI#4 subsequently identified the
21 prostitutes as Mijin Mun, by reviewing Mun's driver's license photograph, and "Angie,"
22 by reviewing surveillance photographs of Angie arriving at Sea-Tac Airport on July 21,
23 2006. CI#4 told Qu that he would "come back later," and then departed the brothel. On
24 his way out, CI#4 saw Kang entering the brothel. Later that night, CI#4 went back to
25 Kang's brothel. He observed Kang, Thongyot Liamurai, and Qu working at the brothel.
26 According to CI#4, Liamurai was wearing "street clothes" and did not appear to be
27 working as a prostitute.

28

VII. ZHENHUA LIU'S BROTHEL.**A. Investigation of Zhenhua Liu and Liancheng Ning at Liu's Brothel.**

In the Fall of 2005, CI#4 provided information to the SPD about a brothel which was operating at 4425 South Myrtle Street, Seattle. According to CI#4, the contact phone number for the brothel was (206) 599-9852. Through subsequent investigation, CI#4 learned that an Asian male who used the name "Jo Jo" operated the brothel. CI#4 subsequently positively identified "Jo Jo" as defendant Zhenhua Liu, after reviewing Liu's Washington State driver's license photograph. As set forth below, surveillance officers frequently have observed defendant Liancheng Ning at Liu's brothel, and have seen Ning transport prostitutes between Liu's brothel and Sea-Tac Airport on multiple occasions.

On November 7, 2005, at the direction of law enforcement officers, CI#4 called (206) 599-9852 and spoke to Liu. CI#4 told Liu that he wanted to visit Liu's brothel. Liu instructed CI#4 to meet him at the Viet Wah market in Seattle. Liu arrived at the Viet Wah driving a gold Honda Accord (Washington license plate 188-TVB), which is registered under Liu's name. Liu instructed CI#4 to get into Liu's vehicle, and then he drove CI#4 to the brothel at 4425 South Myrtle Street (hereinafter the "Myrtle Street brothel"). During the drive, Liu informed CI#4 that there were two prostitutes working at the brothel. Liu described the prostitutes as "Kim Chee" (Korean) and "Beijing" (Chinese). At the brothel, CI#4 observed the two prostitutes. Liu instructed CI#4 to choose a prostitute, and pay the \$120 fee directly to her. CI#4 met with the Korean prostitute. She told CI#4 that she had been in Seattle for two or three days, and that she had previously been in California, where she would return in five days. Based on my training and experience, this travel pattern is consistent with Asian prostitution rings that have previously been investigated and prosecuted in this District and elsewhere, in that the female prostitutes rotate from brothel to brothel (city to city) approximately every ten to fourteen days. After CI#4 met with the prostitute, Liu drove him back to the Viet Wah in his gold Honda Accord.

1 On December 20, 2005, at 2:46 a.m., surveillance agents observed two Asian
2 males and a young Asian female depart the Myrtle Street brothel in a vehicle and drive a
3 few blocks. Then one of the men and the female entered a different car and drove back
4 toward the brothel. A SPD officer conducted a traffic stop on the vehicle, for the purpose
5 of identifying the occupants. The Asian male was identified as Chun Kwan Lam, whose
6 role in the brothel operation is unknown. The Asian female was identified as Young Hec
7 Lee, who was subsequently identified as a prostitute working at Liu's brothel (as
8 described below). Initially, Lee stated that she was "visiting a friend in Seattle" and that
9 her identification was at her "friend's" house. The officer followed Lee back to the
10 Myrtle Street brothel, where Lee retrieved her California driver's license. Lee also
11 showed the officer a plane ticket for her return trip to Los Angeles on Alaska Airlines on
12 December 23, 2005.

13 On December 22, 2005, CI#4 visited Liu's Myrtle Street brothel. To arrange the
14 visit, CI#4 called Liu at (206) 599-9852. When CI#4 first arrived at the brothel, Liu was
15 not present; however, Liu arrived ten minutes later. CI#4 met with a Korean prostitute
16 who used the name "Billie." CI#4 subsequently identified "Billie" as Young Hec Lee, by
17 reviewing her California driver's license photograph. Lee told CI#4 that she was from
18 Los Angeles, she had been in the United States for eleven months, and she had a visa
19 which lasted for two years. Lee further stated that she would be leaving Seattle the
20 following day. At the end of their meeting, CI#4 paid Lee \$140, and then departed the
21 brothel. On his way out of the brothel, Liu thanked CI#4 for his business, and asked him
22 to "come back later." CI#4 overheard Liu telling other customers that a "new girl"
23 (prostitute) would arrive on December 24, 2005.

24 On December 23, 2005, police officers conducted surveillance at the Myrtle Street
25 brothel, in anticipation of Young Hec Lee's departure. When they arrived, officers
26 observed a Nissan Sentra (Washington license plate 603-LXX) parked outside of the
27 brothel; this vehicle was registered to Liancheng Ning. Officers also observed Liu's gold
28 Honda Accord parked in front of the brothel. Shortly thereafter, officers observed Ning

1 and Young Hec Lee exit the brothel together and enter the Nissan Sentry. Ning then
2 drove the vehicle to the airport. At the airport, Lee exited the vehicle with her luggage
3 and entered the terminal. Surveillance officers took pictures of Lee, and observed her
4 boarding an Alaska Airlines flight to Los Angeles.

5 On January 8, 2006, CI#4 called Liu at (206) 599-9852. Among other things, Liu
6 stated that two "new girls" (prostitutes) would arrive at his brothel on January 11, 2006.
7 Based on this information, agents conducted surveillance at Liu's brothel on January
8 11th. At 1:59 p.m., agents observed Ning's Nissan Sentra (603-LXK) arrive at the
9 brothel. Ning was driving the vehicle, and a young Asian female was sitting in the
10 passenger seat. Ning led the Asian female into the rear door of the brothel. The Asian
11 female was wheeling luggage behind her. Based on these circumstances, and on this
12 investigation to date, I believe that this Asian female had arrived at the airport from out-
13 of-state for the purpose of working as a prostitute at Liu's brothel, and that Ning
14 transported her from the airport to the brothel.

15 On January 22, 2006, CI#4 visited Kang's brothel on Shaffer Avenue. While at
16 the brothel, CI#4 spoke with one of the prostitutes. Among other things, the prostitute
17 stated that she had previously worked at "Jo Jo's place," referring to Liu's brothel.

18 On February 5, 2006, surveillance agents observed Liu's gold Honda Accord (WA
19 188-TVB) parked in front of his brothel on Myrtle Street. At 11:56 p.m., Liu exited the
20 brothel, drove his vehicle to a nearby Safeway store, and then escorted another vehicle
21 back to the brothel. Based on my training and experience, and on this investigation to
22 date, I believe that Liu met a customer at the Safeway store, and then escorted him to the
23 brothel.

24 On March 7, 2006, CI#4 visited Liu's Myrtle Street brothel. CI#4 called Liu at
25 (206) 599-9852 and asked what nationalities of prostitutes Liu had working at the brothel.
26 Liu stated that there were three prostitutes, who were Malaysian, Korean, and Thai.
27 When CI#4 arrived at the brothel, Liu was present in the living room along with all three
28 prostitutes. According to CI#4, another customer "picked" the Korean prostitute and

1 entered a bedroom with her. CI#4 met with the Thai prostitute, who stated that she just
2 arrived from Chicago two days earlier, and that she would be returning to Chicago in a
3 few days. CI#4 paid her \$120 plus a tip after their meeting. As CI#4 left the brothel, Liu
4 thanked him for coming. CI#4 told Liu that next time he may bring a friend with him.

5 On March 11, 2006, surveillance agents observed Liu accompanying a young
6 Asian female to a Bank of America branch near the Myrtle Street brothel. The agents
7 took photographs of Liu and the Asian female. CI#4 subsequently identified the female
8 as one of the prostitutes who was working at Liu's brothel on March 7, 2006.

9 On March 23, 2006, CI#4 called Liu at (206) 599-9852 and arranged to visit Liu's
10 brothel. When CI#4 arrived at the Myrtle Street brothel, he observed numerous
11 customers waiting for the prostitutes. CI#4 left the brothel because the wait was too long.

12 On May 15, 2006, CI#4 called Liu at (206) 599-9852. Liu stated that he had three
13 prostitutes -- a Korean, a Vietnamese, and a Thai. CI#4 asked to come to Liu's brothel.
14 Liu told CI#4 that he moved the brothel location, and instructed CI#4 to meet him at the
15 old Myrtle Street location. Liu arrived in his gold Honda Accord, and then he led CI#4 to
16 the new brothel address, at 5403 Columbia Drive South, Seattle. Surveillance agents
17 followed Liu and CI#4 to the new brothel location. When they arrived, Liu led CI#4 into
18 the brothel, and told him to "pick a girl." CI#4 observed all three prostitutes at the
19 brothel. CI#4 met with the Thai prostitute and paid her the \$120 fee. She stated that she
20 recently arrived from Chicago, and would be returning there shortly. On his way out of
21 the brothel, CI#4 spoke briefly with the Thai prostitute. CI#4 asked whether she would
22 be there "on Friday" if he came back. She stated that she would still be at Liu's brothel.

23 On May 27, 2004, at 2:14 p.m., surveillance agents observed Liu's Honda Accord
24 parked in the garage of the brothel at 5403 Columbia Drive South (the garage door was
25 open). At 3:08 p.m., Liu left the brothel driving his Honda Accord, drove to a nearby Red
26 Apple market, and escorted another vehicle (a customer) back to the brothel. At 3:13
27 p.m., agents observed a 1995 Honda Civic (Washington license plate 776-UTB) arrive at
28 the brothel and park in the garage. This vehicle is registered to Liancheng Ning, and

1 Ning has been observed driving the vehicle on numerous occasions.

2 On June 11, 2006, CI#4 again visited Liu's brothel. He arranged the visit by
3 calling Liu at (206) 599-9852. CI#4 asked Liu "what kind of food" (prostitutes) he had.
4 Liu stated that he had "Hong Kong, Thai duck, and Korean" food. CI#4 then visited
5 Liu's brothel at 5403 Columbia Drive South, Seattle. When he arrived at the brothel,
6 CI#4 observed two prostitutes and three other customers. CI#4 described one of the
7 prostitutes as being from Hong Kong, with a petite build, and reddish/brown hair. Liu
8 met with a Thai prostitute, who used the name "Jenny." Jenny told CI#4 that she was
9 scheduled to fly to Los Angeles on Southwest Airlines the night of June 12, 2006. She
10 further stated that she had been in the United States for four years. CI#4 paid Jenny the
11 \$120 fee, plus a \$10 tip.

12 On his way out of the brothel, CI#4 spoke with Liu. Liu told CI#4, "I have a new
13 girl coming in for you." Liu said the new prostitute would be arriving later that night at
14 approximately 10:00 p.m. CI#4 also overheard Liu talking on his cellular telephone with
15 someone Liu referred to as "Mimi." CI#4 heard Liu tell Mimi that she was scheduled to
16 arrive (at his brothel) on June 22, 2006, and leave on June 30, 2006. According to CI#4,
17 Liu further told Mimi, "You've got to work for eight days." Liu also commented that this
18 was Mimi's first time working for him. Based on this conversation, I believe that Mimi
19 was another prostitute who was arranging to travel to Seattle for the purpose of working
20 at Liu's brothel. After CI#4 departed the brothel, surveillance agents observed Liu's gold
21 Honda Accord parked in the garage of the residence.

22 Later that night, on June 11, 2006, at approximately 10:00 p.m., SPD officers
23 established surveillance at Sea-Tac Airport, in anticipation of someone associated with
24 Liu's brothel picking-up an arriving prostitute. At approximately 10:30 p.m., officers
25 observed Ning's Honda Civic (776-UTB) arrive at the airport. An Asian male was
26 driving the vehicle (believed to be Ning), and there was a female passenger inside the
27 vehicle. Ning's vehicle first stopped at the arrivals area for United Airlines. An Asian
28 female with luggage entered Ning's vehicle. Based on the statements Liu made to CI#4

1 earlier that day, I believe that this female was the prostitute who was scheduled to arrive
2 at Liu's brothel that night. Ning's vehicle then circled around the airport and stopped at
3 the departures area for Southwest Airlines. A petite Asian female with reddish/brown
4 hair exited the vehicle and walked into the terminal. Surveillance officers then followed
5 Ning's vehicle back to Liu's brothel at 5403 Columbia Drive South, where he parked in
6 the garage. Surveillance officers took photographs of the female who Ning dropped-off
7 at the airport. Through airline records they identified her as Wang Xiaoling, who was
8 scheduled to fly from Seattle to Philadelphia, Pennsylvania. Subsequently, CI#4
9 reviewed photographs of Xiaoling and identified her as the prostitute from Hong Kong
10 that he saw working at Liu's brothel earlier on June 11, 2006. Based on these
11 surveillance observations, I believe that during his trip to the airport on June 11, 2006,
12 Ning both picked-up an arriving prostitute, and dropped-off a departing prostitute.

13 On June 12, 2006, officers established surveillance at Liu's brothel in anticipation
14 of "Jenny's" departure (per her statements to CI#4 on June 11, 2006). Officers observed
15 Ning and an Asian female depart the brothel and enter Ning's Honda Civic (776-UTB).
16 Ning then drove the Asian female to Sea-Tac Airport, where she departed his vehicle with
17 luggage and entered the Continental Airlines terminal. Surveillance officers took
18 photographs of the Asian female, and CI#4 subsequently identified her as "Jenny," the
19 Thai prostitute he met with at Liu's brothel on June 11, 2006.

20 On June 17, 2006, at 11:40 p.m., surveillance agents observed Liu's gold Honda
21 Accord (188-TVB) parked in the garage at the brothel at 5403 Columbia Drive South. At
22 approximately 1:30 a.m., Liu drove the Honda Accord around the block, and returned to
23 the brothel. Based on my training and experience, I know that this type of driving
24 maneuver is commonly employed as a method of counter-surveillance, in an attempt to
25 determine whether law enforcement is monitoring the suspect.

26 On June 22, 2006, at 9:30 a.m., surveillance officers observed Liu's gold Honda
27 Accord parked in the garage at the brothel at 5403 Columbia Drive South. At 11:45 a.m.,
28 Ning's Honda Civic (776-UTB) arrived at the brothel. Surveillance officers observed

1 several Asian men entering and exiting the brothel (believed to be brothel customers). At
2 2:00 p.m., Liu departed the brothel in his Honda Accord, met up with another vehicle, and
3 escorted it back to the brothel. At 2:38 p.m., Liu and Ning departed the brothel and drove
4 away in Liu's Honda Accord (Liu was driving). Surveillance officers attempted to follow
5 the vehicle, but lost contact with it after a few minutes. Surveillance at the brothel was
6 discontinued at 4:00 p.m., and resumed at 7:30 p.m., at which time Liu's Honda Accord
7 was again parked in the garage of the brothel. Over the course of the night, between 9:35
8 p.m. and 1:30 a.m., officers observed at least sixteen Asian males enter the brothel, and
9 exit approximately thirty minutes later. Many of these men were directed into the brothel
10 by Liu, who was also seen talking on his cellular telephone. Based on this investigation
11 to date, and on my training and experience, I believe that these Asian men were customers
12 that Liu was directing into the brothel.

13 On June 24, 2006, at 12:20 a.m., surveillance officers observed Liu's gold Honda
14 Accord parked in the garage at the brothel at 5403 Columbia Drive South. Between
15 12:20 a.m. and 1:45 a.m., officers observed several Asian males (customers) enter and
16 exit the brothel. At 1:05 a.m., Liu exited the brothel on foot, and did not return prior to
17 the termination of surveillance at 1:45 a.m.

18 On June 28, 2006, at 9:00 p.m., surveillance officers observed Liu's gold Honda
19 Accord parked in the garage at the brothel at 5403 Columbia Drive South. Between 9:00
20 p.m. and 10:00 p.m., officers observed several Asian males (customers) enter and exit the
21 brothel.

22 On June 29, 2006, at 8:40 p.m., surveillance officers observed Ning's Honda Civic
23 (776-UTB) parked on the lawn in front of Liu's brothel. At 8:45 p.m., Liu arrived at the
24 brothel driving his gold Honda Accord (188-TV8), and parked his vehicle in the garage.
25 At 8:46 p.m., Ning walked out of the brothel and drove the Honda Civic to his residence,
26 located at 7309 32nd Avenue South, Seattle. Agents observed Ning walking in and out of
27 this residence. Ning then walked down the street to Kesheng Zhu's residence, located at
28 3211 S. Othello Street, Seattle. Surveillance officers observed Ning and Zhu talking in

1 front of Zhu's residence for approximately twenty minutes.

2 On July 10, 2006, surveillance agents observed Liu's Honda Accord parked in the
3 garage of the brothel. On July 11, 2006, at 9:25 p.m., surveillance agents again observed
4 Liu's Honda Accord parked in the garage of the brothel. At 9:50 p.m., Liu departed the
5 brothel in his vehicle, met with a customer's vehicle at a nearby McDonald's restaurant,
6 and escorted the other vehicle back to the brothel. Both Liu and the customer entered the
7 brothel through the garage door. Over the next two hours, several Asian males
8 (customers) entered and exited the brothel.

9 On July 20, 2006, CI#4 visited Kang's brothel (as described more fully below).
10 CI#4 met with a Thai prostitute, who stated that she had recently arrived in Seattle from
11 Philadelphia, and would be returning to Philadelphia in a few days. The prostitute asked
12 CI#4 if he knew the phone number for "Jo Jo's place" (Liu's brothel), indicating that she
13 was interested in working at Liu's brothel. CI#4 refused to give her Liu's phone number.
14 He explained that Kang would be angry if he "gave his girl away."

15 On July 24, 2006, officers conducted surveillance at Liu's brothel at 5403
16 Columbia Drive S. At 12:15 p.m., Ning and Liu entered a blue 1996 Nissan Sentra
17 (Washington license plate 552-NYD) and drove to a post office (Ning was driving). They
18 next drove to a market nearby the brothel, motioned to the driver of another vehicle, and
19 led the vehicle back to the brothel. Both vehicles parked in the driveway, and the
20 occupants of both vehicles entered the brothel. At 1:10 p.m., Liu exited the brothel, drove
21 the Nissan Sentra to the same market, picked-up an Asian male (believed to be a brothel
22 customer), and drove back to the brothel; approximately 45 minutes later, Liu drove the
23 same customer back to the market. At 2:15 p.m., Ning and Liu exited the brothel and
24 drove the Nissan Sentra to Sea-Tac Airport (Ning was the driver). The Nissan pulled into
25 the arrivals area next to a young Asian female who was standing on the curb with
26 luggage. Ning and Liu exited the vehicle and assisted the female in loading her luggage
27 into the vehicle. The female sat in the back seat of the Nissan Sentra, and the vehicle
28 drove directly back to Liu's brothel. Surveillance officers took photographs of the Asian

1 female at the airport. When they arrived at the brothel, Liu and Ning quickly motioned to
2 the female to enter the brothel through the garage door. The female stopped to get her
3 luggage out of the car, but Liu and Ning urged her to quickly enter the brothel. Based on
4 my training and experience, I believe that Liu and Ning were attempting to conceal from
5 their neighbors that the residence was being operated as a brothel, by hiding the fact that
6 the young Asian female had just arrived. Approximately fifteen minutes after they
7 arrived at the brothel, Liu and Ning left again in the Nissan Sentra (Ning was driving).
8 Surveillance officers followed them to a money remittor business located in Seattle. Liu
9 and Ning entered the business and stayed inside for thirty minutes. Surveillance was
10 terminated while they were still inside of the business.

11 On July 26, 2006, CI#4 visited Liu's brothel at 5403 Columbia Drive South. Prior
12 to visiting the brothel, CI#4 called Liu at (206) 599-9852 and left a voicemail message.
13 Liu returned CI#4's call, using a new telephone number of (206) 349-0991. The phone
14 conversation was consensually recorded. CI#4 asked Liu what types of prostitutes he had
15 working in the brothel. Liu stated that he had three prostitutes, who were Japanese,
16 Vietnamese, and Malaysian. CI#4 asked when Liu would get "new girls." Liu advised
17 CI#4 that he did not want to "talk too much over the phone," and he told CI#4 to "come
18 to the house" (brothel). When CI#4 arrived at the brothel, Liu opened the door and let
19 him inside. CI#4 met with the Japanese prostitute, who stated that she arrived in Seattle
20 two days ago from Los Angeles, and that she was scheduled to fly back to Los Angeles
21 on August 1, 2006. CI#4 subsequently identified the Japanese prostitute as the same
22 Asian female Liu and Ning picked-up at the airport on July 24, 2006, after reviewing
23 surveillance photographs of the prostitute.

24 On August 1, 2006, CI#4 called Liu at (206) 349-0991 and asked whether he could
25 bring a "friend" to Liu's brothel. Liu replied, "No problem." Unbeknownst to Liu, the
26 "friend" was a SPD undercover officer ("UC"). At 11:02 p.m., the UC and CI#4 went to
27 Liu's brothel at 5403 Columbia Drive South. Liu answered the door and let them inside.
28 The UC and CI#4 sat on a couch in the living room and waited for a prostitute to become

1 available. When they arrived, there were two other customers waiting in the living room.
2 A few minutes later, Liu answered the door and two additional customers entered the
3 brothel. Shortly thereafter, an Asian female dressed in lingerie and high-heeled shoes
4 entered the living room, waived to one of the customers, and escorted him into a
5 bedroom.

6 At 11:20 p.m., a second Asian female dressed in lingerie and high-heeled shoes
7 entered the living room. Liu asked the customers, "Who wants Chinese-Vietnamese?
8 Who's next?" The UC replied, "Okay." The female then led the UC to one of the
9 bedrooms in the house. She stated that her name was "Yung" and that she was
10 Vietnamese "from Hong Kong." Yung told the UC to take off his clothing and lie on the
11 bed. The UC undressed to his underpants, and started to lie on the bed. Yung laughed,
12 pointed at the underpants, and said, "Take it off, don't be shy." The UC asked Yung,
13 "How much does it cost?" Yung shook her head and held a finger up to her lips,
14 signaling that the UC should be quiet. She held up her left palm and traced the numbers
15 "1-2-0" with her right index finger, indicating a price of \$120.00. The UC then lied on
16 the bed with his stomach down. He asked Yung, "What else do I get to do?" Yung
17 replied, "You roll over and [have sex with] me." Yung then undressed and began to
18 massage the UC's back. Yung stated that she arrived in Seattle two days earlier, and that
19 she would be leaving in "one week." The UC then received a ruse phone call, and told
20 Yung that he had to leave. The UC paid Yung \$140.00 and departed the bedroom. On
21 his way out of the brothel, the UC thanked Liu. Liu asked whether the UC had Liu's
22 phone number. The UC replied, "No, can I get it?" Liu said, "Yeah, you call me." Liu
23 then handed the UC a business card which reads: "(206) 349-0991 - Jo." Liu stated,
24 "That's me," referring to the name "Jo" on the card. The UC then exited the brothel.

25 On August 1, 2006, at approximately 9:30 p.m., SPD officers established
26 surveillance at Liu's brothel in anticipation of the UC's arrival. Officers observed Liu's
27 gold Honda Accord and the blue Nissan Sentra (552-NYD) parked in front of the brothel.
28 At approximately 9:45 p.m., officers observed Ning exit the brothel with a young Asian

1 female. They entered a white Honda Civic (Washington State license plate 508-VHN),
2 which is registered to Ning. Officers followed Ning's vehicle from the brothel directly to
3 Sea-Tac Airport, where the Asian female exited Ning's car and entered the Delta Airlines
4 terminal. Through airline records, officers identified the Asian female as Chai Hew.
5 Hew arrived in Seattle on July 23, 2006, from New York; and she was returning to New
6 York later that night.

7 On August 1, 2006, while CI#4 was at Liu's brothel (along with the UC), Liu told
8 him to "come back tomorrow" because a "new girl" would arrive in the morning. Based
9 on this information, on August 2, 2006, at approximately 8:00 a.m., SPD officers
10 established surveillance at Liu's brothel and at Ning's residence, in anticipation of either
11 Liu or Ning picking-up an arriving prostitute at the airport. At approximately 9:00 a.m.,
12 officers observed Ning depart his residence, located at 7309 32nd Avenue S., Seattle.
13 Ning entered his white Honda Accord (508-VHN) and drove directly to the arrivals area
14 at Sea-Tac Airport. At approximately 9:25 a.m., officers observed a young Asian female
15 enter Ning's vehicle. Ning then drove directly to Liu's brothel, where he and the Asian
16 female entered the brothel. Officers also observed Liu's gold Honda Accord and the blue
17 Nissan Sentra (552-NYD) parked in front of Liu's brothel.

18 B. Wiretap Calls Concerning Liu's Brothel.

19 Although Liu has not been personally intercepted over the wiretaps during this
20 investigation, he frequently was discussed by Kang and other persons during intercepted
21 conversations. During these conversations, Liu was referred to by his alias, "Jo Jo." The
22 intercepted conversations confirm that Liu operates a brothel in Seattle, and that Liu's
23 brothel is connected to the nationwide network of brothel operators, brokers, and
24 prostitutes. The most pertinent conversations concerning Liu are summarized below.
25 Unless otherwise noted, the calls were intercepted over TT1.

26 Call 889 (TT2): On June 7, 2006, a customer named "Louis" told Kang that he
27 could not find Kang's brothel the night before, so he called "Jo Jo," referring to Liu.
28 Louis asked whether Kang's "place" (brothel) was close to Jo Jo's place. Kang stated

1 that he did not know where Jo Jo's brothel was located.

2 Call 1230 (TT2): On June 10, 2006, a customer called Kang and mistakenly asked
3 for "Jo Jo," referring to Zhenhua Liu. Kang informed the customer that he was "James."
4 The customer asked what "flavors" (prostitutes) Kang "had." Kang replied, "Korean,
5 Malaysian, and Thai."

6 Calls 387-88, 452: On June 12, 2006, Kang received a call from a prostitute
7 named "Jesse." Jesse explained that she had been working for two days at "Jo Jo's"
8 brothel in Seattle. Jesse complained about Jo Jo and his customers, and asked whether
9 she could "switch" and work at Kang's brothel. Kang declined, and stated that he had
10 enough "girls" already. Kang told Jesse to "just hang in there." Kang explained that it
11 would not be appropriate for a "girl" to leave Jo Jo's brothel for Kang's brothel, because
12 it would seem as though he was "stealing Jo Jo's people." On June 13, 2006, however,
13 Kang spoke to Jesse about working at his brothel in the future. Kang told Jesse that he
14 scheduled prostitutes to begin work on the 1st, 2nd, 11th, 12th, 21st, and 22nd days of
15 each month. Jesse agreed to begin working for Kang on July 22, 2006.

16 Call 857: On June 25, 2006, Kang received a call from a prostitute who stated
17 that she was currently working at "Jo Jo's house" (Liu's brothel). She explained that she
18 purchased an airline ticket for a ten-day stay in Seattle, not knowing that "Jo Jo" only
19 scheduled prostitutes to work for eight days. Thus, she had two extra days in Seattle, and
20 she wanted to work at Kang's brothel for those days (June 26 and 27, 2006). Kang
21 declined, stating that he already "had enough people" (prostitutes). Kang asked how
22 many "people" were working at "Jo Jo's" brothel, and she stated that "Jo Jo" had three
23 prostitutes.

24 Call 1311: On July 14, 2006, Thongyot Liamurai asked how Kang's business had
25 been during the last two days. Kang stated it was "so-so." Liamurai then told Kang that
26 she recently talked to "Ah Man" from Norfolk, Virginia. Liamurai informed Kang that
27 Ah Man knew that Kang and "Jo Jo" (Liu) operated brothels in Seattle.

28

1 **Call 4858 (TT2):** On July 26, 2006, a customer asked Kang whether this was "the
2 message place" and what time it closed. Kang stated that the brothel closed at 1:30 a.m.
3 The customer then asked whether this was "Jo Jo's place," referring to Liu's brothel.
4 Kang corrected the customer, stating it was "James' place" (Kang's brothel).

5 **Call 5007 (TT2):** On July 28, 2006, a customer asked Kang how much he charged
6 "for a massage." Kang said the price was \$120.00. The customer asked whether he was
7 speaking to "Jo Jo" (Liu) and whether the price could be lowered. Kang replied that if he
8 "wants it cheaper," the customer should "go to Jo Jo," referring to Liu's brothel.

9 **VIII. LIANCHENG NING'S ROLE AS A TRANSPORTER FOR KANG AND LIU.**

10 **A. Ning's Criminal Activities at Liu's Brothel.**

11 As set forth above, surveillance agents have observed Liancheng Ning at Liu's
12 brothel on numerous occasions during this investigation. On multiple occasions, Ning
13 transported prostitutes between Liu's brothel and Sea-Tac Airport, in facilitation of the
14 prostitution activities. As described below, Ning performed a similar role at Kang's
15 brothel.

16 **B. Ning's Criminal Activities at Kang's Brothel.**

17 Wiretapped phone calls and physical surveillance have established that Kang pays
18 Ning to transport prostitutes between Kang's brothel and Sea-Tac Airport, in facilitation
19 of the prostitution activities. Unless otherwise noted, the following conversations were
20 intercepted over TT1.

21 **Call 104 (TT2):** On June 1, 2006, at 12:45 a.m., Pengquan Xie used TT2 to call
22 Liancheng Ning (the phone used by Ning is subscribed to in his name). Xie introduced
23 himself as a friend of "Zhu's," referring to Kesheng Zhu. Xie then told Ning that a "girl"
24 (prostitute) needed to be taken to the airport at 9:30 a.m. that morning. He asked Ning
25 how much he would charge to transport the "girl." Ning stated it would be \$25.00, and
26 that Xie could ask his "boss" to verify the price, referring to Kang. Ning then asked,
27 "You haven't moved, have you?" referring to the location of the brothel. Xie then handed
28 the phone to Kang, who told Ning the new brothel location (4411 11th Avenue, Seattle).

1 Ning confirmed that he would be there at 9:30 a.m.

2 Based on this call, agents established surveillance at Kang's brothel beginning at
3 8:02 a.m. At 9:18 a.m., Ning arrived at the brothel driving his black Honda Civic (776-
4 UTB). Ning exited the vehicle and entered the brothel. Two minutes later, Ning left the
5 brothel carrying a suitcase, accompanied by a young Asian female. They both entered
6 Ning's car (Ning was the driver) and drove to Sea-Tac Airport. The vehicle stopped at
7 the departures area, where the female exited the vehicle and entered the terminal. Ning
8 drove away from the airport, and eventually surveillance was discontinued. Through
9 airline records, surveillance agents identified this Asian female as Ji Hyun, a Korean
10 citizen. She was scheduled to board a Southwest Airlines flight to Los Angeles that day.

11 Call 93: On June 2, 2006, Kang spoke with Kesheng Zhu about Liancheng Ning.
12 Kang told Zhu that Ning helped him "send away a girl yesterday morning and this
13 morning," and that Ning will "make a lot of money" if he continues "to cooperate with"
14 (work for) Kang.

15 Calls 241-43, 250: On June 6, 2006, Xie told Kang that the Korean prostitute (at
16 the brothel) needed a ride to the airport. Xie asked Kang whether he should "call up that
17 guy," referring to Ning. Kang said he would make the call (to Ning). Kang then called
18 Ning and asked him to take a "girl to the airport" and to "come over now." Ning agreed
19 to do so. Kang then called Xie back, and said that Ning would pick-up the girl. Kang
20 reminded Xie to give the prostitute \$20.00 (to pay Ning), and to have her leave "from the
21 garage" (to conceal the brothel activity from neighbors and law enforcement). Later, Xie
22 told Kang that Ning had arrived, but that the prostitute decided not to leave after all.

23 Calls 290-91: On June 8, 2006, Xie told Kang that a Korean prostitute needed to
24 be taken to the airport "right away." Kang said he would call "Lao Shan" to arrange for
25 "car service." Kang then called Ning and asked him to "leave right now" to go pick-up
26 the prostitute at the brothel and take her to the airport. Ning agreed to do so, and stated
27 that he would be there in twenty minutes. Kang apologized to Ning that the prostitute had
28 changed her mind over the last two days, referring to occasions on which Ning went to

1 the brothel to transport prostitutes, but ended up not doing so.

2 **Call 539:** On June 15, 2006, at 1:16 p.m., Kang called Liancheng Ning and asked
3 whether Ning could "go pick up a girl" (take a prostitute to the airport). Ning agreed, and
4 said he would be at the "house" (brothel) in less than fifteen minutes. Shortly thereafter,
5 at 1:25 p.m., Ning arrived at Kang's brothel driving his black Honda Civic (776-UTB).
6 Surveillance agents observed Ning park in the driveway and enter the brothel. Three
7 minutes later, Ning exited the brothel with an Asian female, who was wearing a yellow
8 baseball hat and a black shirt. Agents recognized the Asian female as the prostitute
9 named "Nana," who arrived at Sea-Tac Airport on June 7, 2006 (as described above).
10 Agents observed Ning and Nana enter Ning's vehicle, which Ning drove from the brothel
11 to the departures area of Sea-Tac Airport. Nana exited Ning's vehicle and entered the
12 Continental Airlines terminal. Through airline records, agents identified her as Hyon Mi
13 Choi, a Korean national. Choi purchased a one-way ticket from Seattle to Newark, New
14 Jersey.

15 **Calls 926-29, 932-34:** On June 27, 2006, Kang received calls over TT2 from a
16 customer named "Wu" (calls 2837, 2862, 2866). Wu asked Kang to "deliver a pretty girl"
17 to him at the Hilton Hotel near Sea-Tac Airport. Kang declined, but encouraged Wu to
18 visit the brothel. Kang explained that rather than paying a higher price for "delivery," Wu
19 should come to the brothel, "choose the girl" he liked, and "do the same girl twice . . . or
20 get some rest, and then do a different girl." Wu agreed to come to the brothel, but said he
21 did not know how to get there. Kang told Wu he would call "a Chinese guy who does the
22 transports" (referring to Ning) and Wu could pay him to drive Wu from the hotel to the
23 brothel, which would be cheaper than a taxi. Kang then called Kesheng Zhu, and asked
24 Zhu to transport Wu from the hotel to the brothel. Zhu later told Kang that he sent Ning
25 to pick-up Wu, because he (Zhu) wanted to be available if any customers called for his
26 escort service. Kang then had several conversations with Ning, during which he assisted
27 Ning in finding Wu. Ultimately, Ning told Kang that "he found the person" and was
28 "heading back" to the brothel. During these intercepted calls, surveillance officers

1 observed Ning's Honda Civic (776-UTB) arrive at the Hilton Hotel. Ning exited the
2 vehicle and went into the hotel. Shortly thereafter, Ning exited the hotel with an Asian
3 male (believed to be "Wu"). They both entered Ning's vehicle, which Ning drove
4 directly to Kang's brothel.

5 **Call 1013:** On June 29, 2006, Kang asked Ning whether he was "available" the
6 following morning at 7:00 a.m. to "help send one" (take a prostitute from the brothel to
7 the airport). Ning agreed to arrive at the brothel at 7:00 a.m. to transport the prostitute.
8 Based on this call, agents established surveillance at Kang's brothel the following day,
9 June 30, 2006, at 6:25 a.m. At 6:46 a.m., Ning's black Honda Civic arrived at the
10 brothel. Ning then entered the front door of the brothel. Three minutes later, Ning left
11 the brothel, entered his vehicle, and pulled it into the garage of the house. At 6:52 a.m.,
12 Ning and an Asian female left the brothel in Ning's car, and drove directly to the arrivals
13 area at Sea-Tac Airport. The Asian female exited the vehicle, took her luggage out of the
14 trunk, and entered the terminal. Ning's vehicle then departed the airport, and surveillance
15 was discontinued.

16 **Calls 1430, 1436, 1439, 1441, 1445:** During intercepted conversations over TT2
17 (summarized below), Thongyot Liamurai made arrangements to fly to Seattle to work as
18 Kang's temporary brothel manager. On July 19, 2006, Kang asked Ning to meet
19 Liamurai at the airport and drive her to the brothel. Later that day, surveillance agents
20 observed Ning pick-up Liamurai at Sea-Tac Airport. Ning then transported Liamurai
21 directly to Kang's brothel. When Ning arrived, he asked Kang to "open the door" to the
22 brothel. Kang instructed him to "park on the left side." During call 1430, Kang also told
23 Ning to "come over" to the brothel "to discuss something." Based on subsequent
24 intercepted conversations (see below), I believe that Kang and Ning discussed whether
25 Ning was interested in replacing Pengquan Xie as the manager of Kang's brothel, or
26 whether Ning knew anyone else who would be interested in the job.

27 **Calls 1484, 1487, 1489, 1494:** On July 21, 2006, at 5:22 p.m., Kang called Ning
28 and asked him to pick-up a prostitute at the airport. The prostitute was subsequently

1 arrested and identified as Chalanthorn Malakul (a/k/a "Vicki"). Kang told Ning that the
2 prostitute just arrived, and was getting her luggage. Ning agreed to transport Malakul
3 from the airport to Kang's brothel. Kang stated that as Ning arrived at the airport, Kang
4 would tell him exactly where Malakul was waiting. While Ning was en route to the
5 airport, however, Malakul was arrested by ICE agents on immigration charges (as
6 described above). At 6:15 p.m., Ning called Kang and asked where Malakul was. Kang
7 stated he would call her. At 6:51 p.m., Kang told Ning not to wait any longer. Kang
8 explained that he tried to call Malakul "eight times" but she never answered the phone.
9 Kang advised Ning to "come back" to his place (the brothel).

10 **Call 1516:** On July 22, 2006, at 1:52 a.m., Kang asked Ning whether he could
11 "send one person at 9:30 a.m.," referring to Ning transporting a prostitute from the
12 brothel to the airport the next morning. Ning agreed to do so. Kang told Ning to come to
13 the brothel and knock on the front door, and that "she will be waiting downstairs."

14 **Calls 1562-63:** On July 24, 2006, Ning asked Kang whether he "found someone
15 yet," referring to Kang's search for a new brothel manager. Ning said he "found a man"
16 for Kang. Kang stated that he had already found someone (Zheng Qu), but was still
17 interested in meeting Ning's person. Ning explained that the person was "in Seattle right
18 now" and was with Ning. Kang said he would go to Ning's house to meet the person.

19 **Call 1939:** On August 7, 2006, at 12:16 a.m., Kang reminded Ning to be at his
20 brothel by 10:00 a.m. (to transport a departing prostitute from the brothel to the airport).
21 Ning confirmed that he would be there.

22 **IX. THE ESCORT SERVICE RUN BY KESHENG ZHU AND RUJING JIANG.**

23 **A. Introduction.**

24 As set forth above, Kesheng Zhu and Rujing Jiang were first identified during the
25 investigation of the Apple Spa, which they operated (along with Kang) as a front for
26 prostitution activities. More recently, intercepted conversations over TT1 and TT2
27 revealed that Kang still maintained a close relationship with both Zhu and Jiang, and that
28 Kang and Zhu regularly discussed Kang's brothel business over the telephone.

1 Further investigation revealed that Zhu and Jiang currently operate a prostitution
 2 escort service, based out of their Seattle residence. In June 2006, investigating agents
 3 discovered a newspaper advertisement for an escort service, which listed 206-753-9980
 4 (TT4) as the contact phone number. Rujing Jiang is the listed subscriber and the user of
 5 this cellular telephone.⁹ The advertisement, which ran in both the Seattle Weekly and The
 6 Stranger newspapers, stated: "Asian Girl - Outcalls Only - 7 days, 24 hours - (206) 753-
 7 9980." The same advertisement has run in both newspapers each week since agents first
 8 discovered it.

9 As interception over TT1 and TT2 continued, conversations between Kang and
 10 Zhu confirmed that Zhu and Jiang were operating an escort service, and that they
 11 employed as prostitutes Asian women who were rotated approximately every two weeks.
 12 During these conversations, Zhu used cellular telephone 626-679-1908 (TT3).¹⁰ Some of
 13 the most pertinent intercepted conversations concerning Zhu's and Jiang's escort service
 14 are summarized below. Unless otherwise indicated, the calls were intercepted over TT1.

15 **B. Intercepted Conversations Over TT1 and TT2 (May 31st - June 11th).**

16 **Call 9:** On May 31, 2006, Kang told Zhu that he was "in the office," referring to
 17 his brothel. During numerous other intercepted calls, Kang referred to the brothel as the
 18 "office."

19 **Calls 127, 138:** On June 3, 2006, Kang told Zhu that one of the "girls"
 20 (prostitutes) was giving him problems, and Kang lamented the fact that she was scheduled
 21 to continue working at the brothel until June 15th. Kang further stated that he was
 22 driving back to the "restaurant" (brothel).

23
 24 ⁹ On July 12, 2006, Jiang was identified as the user of TT4 as follows: An FBI analyst
 25 placed a ruse telephone call to TT4, posing as a T-Mobile employee. An Asian female answered
 26 the phone. The analyst asked to speak with "Rujing Jiang." The female stated that she was
 Jiang. The analyst then asked to verify Jiang's address. Jiang provided her correct residence
 address to the analyst, and then the call was terminated.

27 ¹⁰ On June 5, 2006, Zhu was identified as the user of TT3 as follows: During intercepted
 28 calls over TT1, Kang made plans to meet the user of TT3 for lunch. Shortly thereafter,
 surveillance officers observed Kang eating with Zhu and Jiang at an Asian restaurant. Officers
 placed a phone call to TT3, and observed Zhu answer the telephone, confirming that he was the
 user of the phone.

1 **Calls 162-63:** On June 4, 2006, Kang told Zhu that he was at the "restaurant
2 (brothel) . . . taking care of staff." Later, Kang told Zhu he could not leave the brothel
3 because he had "many people" (customers) to "pick up" (escort to the brothel).

4 **Call 178:** On June 4, 2006, Kang and Zhu discussed an unidentified brothel which
5 was operating in Seattle. Kang told Zhu that a customer informed him that "the house"
6 (brothel) on 56th Place was in business again. Kang wondered who was operating the
7 brothel, and what nationality the person was. Kang asked Zhu to go to the brothel and
8 "check it out from outside," referring to Zhu conducting surveillance at the brothel. Zhu
9 stated that nothing could be seen from the outside. Kang then suggested that Zhu could
10 visit the brothel posing as a customer.

11 **Calls 183, 185, 197:** On June 5, 2006, Zhu told Kang that "Monday is a slow day,"
12 referring to having only a small number of customers that day at his escort service.

13 **Call 270:** On June 7, 2006, Kang asked Zhu to call the "old customers" and let
14 them know when the "new ones are here." I believe that during this call, Kang asked Zhu
15 to tell customers at Zhu's escort service when new prostitutes arrive at Kang's brothel.

16 **Call 303:** On June 8, 2006, Kang spoke to defendant Thongyot Liamurai, who was
17 scheduled to work as a call-girl for Zhu and Jiang. Liamurai told Kang that she needed to
18 postpone her arrival date from June 13, 2006, to June 15, 2006, and that she would arrive
19 at 4:20 p.m. via Alaska Airlines. Kang asked whether she had informed "Michael" (Zhu)
20 about the scheduling change. Liamurai assured Kang that she would tell Zhu later that
21 day. Liamurai also stated that she talked to "Jesse," referring to Sranya Panteng, who, at
22 the time, was working as a prostitute for Zhu and Jiang. Liamurai explained that Jesse
23 said it was okay for Liamurai to "replace" Jesse (as a prostitute working for Zhu and
24 Jiang).

25 **Call 319:** On June 9, 2006, Zhu told Kang that he was "about to leave for the
26 airport." Based on this investigation to date, including the fact that Zhu and Jiang rotated
27 their prostitutes approximately every two weeks, I believe that Zhu was going to the
28 airport to facilitate the travel of a prostitute who was working for his escort service.

1 **Call 359:** On June 11, 2006, Zhu told Kang that the past two days had "not been
2 good," referring to the fact that business at his escort service was slow.

3 **C. The Arrest of Prostitute Sranya Panteng on June 12, 2006.**

4 According to pen register data, on June 12, 2006, at 3:31 p.m., David Stephens
5 called Jiang at TT4. As set forth below, Stephens was subsequently identified as a
6 customer of Jiang's and Zhu's escort service. Immediately after the call between Jiang
7 and Stephens, Jiang called Zhu at TT3. Over the next 30 minutes, Jiang and Zhu
8 exchanged five telephone calls. Immediately after the fifth call, Jiang contacted Stephens
9 twice. Based on subsequent events, I believe that during these calls Jiang used TT4 to
10 schedule Stephens' appointment with a prostitute, and that she coordinated the
11 appointment with Zhu by contacting TT3.

12 At 4:36 p.m., Zhu called Kang. The conversation was intercepted over TT1. Zhu
13 told Kang that he was driving a prostitute (later determined to be Sranya Panteng) to
14 Kirkland, Washington. Based on subsequent intercepted calls, I believe that Zhu was
15 driving Panteng to the Motel 6 in Kirkland, where she planned to meet with and provide
16 sexual services to Stephens.

17 Coincidentally, at about the same time Zhu and Panteng arrived at the Motel 6
18 (shortly before 5:00 p.m.), an officer with the Kirkland Police Department was on routine
19 patrol in parking lot of the motel. The officer ran the license plate on one of the cars in
20 the parking lot, which turned out to be registered to Stephens. The officer learned that
21 Stephens was wanted on an outstanding warrant for the offense of Patronizing
22 Prostitution. The officer contacted the motel and learned that Stephens was registered in
23 room 308. The officer contacted Stephens in room 308, placed him under arrest, and
24 walked Stephens to the patrol car for transportation. As the officer placed Stephens in the
25 vehicle, he noticed an Asian female (Panteng) knocking on the door to room 308.
26 According to the officer, she looked surprised that no one was answering the door. The
27 officer contacted Panteng and questioned her as to why she was at the motel. When asked
28 for identification, Panteng was unable to produce anything. She then gave consent for the

1 officer to search her purse for identification. The officer observed a small quantity of
2 marijuana in the purse, and placed Panteng under arrest. The officer also found condoms,
3 lubricant, and other items associated with the sex trade in Panteng's purse. The officer
4 then transported Stephens and Panteng to the police station for further questioning.

5 According to pen register data, at 4:50 p.m., moments after Panteng's arrest, Zhu
6 called Jiang at TT4. Based on subsequent intercepted conversations, I am aware that Zhu
7 was nearby and watched Panteng's arrest. Thus, I believe that he called Jiang at TT4 to
8 warn her about this law enforcement action.

9 Shortly thereafter, a series of calls were intercepted over TT1 concerning
10 Panteng's arrest. At 5:06 p.m., Zhu called Kang and told him that the "Thai girl"
11 (Panteng) had been detained by security officers because she had no identification. Zhu
12 told Kang that the "customer" did not answer the door to his hotel room, and that Panteng
13 was detained. Zhu asked Kang to go to Zhu's house and retrieve Panteng's passport, but
14 Kang refused. Zhu explained that he could not deliver the passport to the police himself,
15 because he could not "surface," referring to the fact that Zhu was an illegal alien. Zhu
16 stated he was worried that the security guard would call the police or "ICE," and that
17 Panteng would lead the police to his house, where her passport and belongings were
18 located. Zhu urged Kang to bring Zhu's "book of customers records" to Kang's house (to
19 avoid the records being seized by law enforcement officers).

20 According to pen register data, at 5:11 p.m., Zhu called Jiang. Two minutes later,
21 Jiang used TT4 to call Stephens' phone number twice, but Stephens did not answer
22 because he was in police custody. Jiang then called Zhu at TT3. I believe that during this
23 call, Jiang advised Zhu that she was unable to reach Stephens. Over the next few hours,
24 both TT3 and TT4 placed several calls to Stephens' telephone number. In addition,
25 between the time of Panteng's arrest and midnight, Zhu and Jiang used TT3 and TT4 to
26 call each other a total of 13 times.

27 At 5:57 p.m., Zhu called Kang. This conversation was intercepted over TT1. Zhu
28 explained that Panteng "came here with no visa" and that all of her belongings were at

1 Zhu's house. Zhu asked Kang to hide his "wife" (Jiang) and son at Kang's house, so the
2 police would not find them. Zhu further stated that he would contact a lawyer to bail
3 Panteng out of jail. At approximately 6:20 p.m., surveillance agents observed Kang's
4 silver Honda Odyssey parked in front of Zhu's and Jiang's former residence at 6401 24th
5 Avenue South. Kang placed a suitcase into his vehicle and drove to the Georgetown Inn.
6 Shortly thereafter, Zhu, Jiang, and their son arrived at the Georgetown Inn in Zhu's green
7 Dodge Caravan (Washington license plate 876-RMR). Agents then followed both
8 vehicles to a Day's Inn hotel, and other locations.

9 Later that evening, Kang received a call from Liamurai, who was scheduled to
10 replace Panteng at Zhu's and Jiang's escort service. Liamurai stated that she was "Jesse's
11 friend," referring to Panteng, and she implied that Panteng had called her from jail.
12 Liamurai asked Kang to help Jesse. Kang explained that he and "Michael" (Zhu) were
13 cleaning up "Jesse's place" (moving Panteng's belongings) and were trying to figure out
14 "what's going on."

15 Later that night, Kang asked Zhu whether "anybody" (in law enforcement)
16 contacted Zhu. Zhu stated that they had not. Kang told Zhu that Liamurai called him,
17 and Zhu also stated that he had talked to Liamurai.¹¹ Zhu explained that, according to
18 Liamurai, the police found marijuana inside of Panteng's purse. Kang told Zhu not to
19 answer any further calls, and to turn off his cell phone. Zhu stated that he would try to
20 call a Chinese lawyer for Panteng the following day.

21 Meanwhile, upon learning about Panteng's arrest, FBI and ICE agents responded
22 to the Kirkland Police Department and took custody of Panteng, due to her illegal
23 immigration status. During interviews with ICE agents, Panteng stated that she was born
24 in Thailand and was a citizen of Singapore. She admitted that she was an illegal alien in
25 the United States, because her visa had expired. She further stated that, while she has
26 been in the United States, she had worked in New York and Houston. According to
27

28 ¹¹ Pen register data confirms that Liamurai's phone contacted Zhu at TT3 during the evening of June 12, 2006, consistent with Zhu's statements to Kang.

1 Panteng, she arrived in Seattle from New York on May 28, 2006, and she intended to
2 return to New York on June 17, 2006. She claimed that she was in Seattle visiting her
3 "friend Mike" (Zhu) and his wife "Do Do" (Jiang), and that she had been staying at their
4 house. Panteng provided consent for agents to review the contents of her cell phone. The
5 number for TT3 was listed in the address book. Panteng did not admit to working as a
6 prostitute, and agents did not ask her any direct questions regarding prostitution, in order
7 to maintain the secrecy of this investigation. Panteng was arrested on immigration
8 charges, and was held at the ICE detention center in Seattle.

9 On June 13, 2006, Kang and Zhu continued to discuss Panteng's arrest. Zhu told
10 Kang that, according to Liamurai, Panteng was in ICE custody because her visa had
11 expired.¹² Zhu further stated that he was attempting to hire a lawyer for Panteng, but it
12 was too expensive. Zhu said he was going to pay Ning \$100 to deliver money to Panteng
13 at the jail, so that she could purchase a phone card. Zhu explained that he wanted
14 Panteng to know that people "on the outside" were trying to help her (so that she would
15 not lead the police to Zhu or Kang). Zhu further stated that he and his family were going
16 to move out of their house, and that they were staying in a motel until they could find a
17 new place to rent. Kang agreed that moving was the "right thing to do" (to avoid law
18 enforcement detection). At the end of the conversation, Zhu reminded Kang that
19 Liamurai would be arriving in Seattle on June 15, 2006.

20 On June 14, 2006, Kang and Zhu continued to discuss Panteng's arrest. Zhu said
21 Liamurai called him earlier that morning and explained "what really happened" to
22 Panteng.¹³ Zhu explained that, according to Liamurai, the police were at the motel to
23 arrest the customer (Stephens) for "drug crimes." When Panteng knocked on his motel
24 room door, the customer refused to answer because he saw the police outside. The police
25 questioned Panteng regarding her presence at the motel, and then took her into ICE
26 custody because she had no identification. Zhu expressed relief that the police did not ask

27
28 ¹² Pen register data confirms Liamurai's phone contacted Zhu at TT3 on June 13, 2006.

¹³ Pen register data confirms Liamurai's phone contacted Zhu at TT3 on June 14, 2006.

1 Panteng "anything about her occupation" (prostitution). Zhu then concluded that the
 2 police had not been at the motel to arrest Panteng, and that the customer must not be an
 3 "undercover" (police officer). Zhu told Kang that if the customer was an "undercover,"
 4 he would have "taken action" (made arrests) the "very first time," but instead the
 5 customer "did it" (had sex) with Panteng on two prior occasions.¹⁴ During the same
 6 conversation, Zhu again reminded Kang that Liamurai was scheduled to arrive in Seattle
 7 the following day. Later in the conversation, Zhu confirmed that he was moving his
 8 residence as a result of Panteng's arrest. At the end of the conversation, Kang
 9 complained to Zhu that "business" (at his brothel) was "slow," and Zhu suggested it was
 10 because of the World Cup soccer matches. Zhu told Kang, "You can't expect business to
 11 stay busy every day."

12 **D. Intercepted Conversations Over TT1 and TT2 (June 15th - June 29th).**

13 **Calls 553, 556, 565, 569, 575:** On June 15, 2006, Kang and Zhu discussed the
 14 arrival of two prostitutes. At 12:38 p.m., Kang told Zhu that "his package" had arrived,
 15 referring to a prostitute arriving at the airport. At 4:46 p.m., Liamurai called Kang and
 16 stated that she had arrived at Sea-Tac Airport. Kang instructed Liamurai to wait for him
 17 outside of the baggage claim at door 10. At 4:50 p.m., surveillance officers observed
 18 Kang arrive at the airport driving his silver Honda Odyssey. Liamurai entered Kang's
 19
 20
 21

22 ¹⁴ Pen register data confirms that Stephens previously ordered a prostitute from Zhu and
 23 Jiang on June 8, 2006. Specifically, on June 8, 2006, between 4:24 p.m. and 5:27 p.m.,
 24 Stephens' phone contacted Jiang at TT4 on three occasions. Immediately after two of the calls
 25 from Stephens, Jiang contacted Zhu at TT3. Over the next hour, TT3 and TT4 exchanged
 26 additional five telephone calls, ranging in duration from one to five minutes. According to
 27 Motel 6 records, Stephens rented a room at the Motel 6 in Kirkland on the night of June 8th.
 28 Based on these circumstances, and on the above-referenced conversation between Zhu and Kang
 during which Zhu stated that Stephens had been serviced by his prostitutes in the past, I believe
 that Jiang and Zhu arranged for Stephens to be serviced by Panteng on June 8, 2006. This
 conclusion is supported by intercepted calls earlier on June 8, 2006, between Zhu and Kang.
 During the first call, Zhu told Kang that he (Zhu) needed to go get some "covers" (condoms)
 from the "office" (Kang's brothel). Later, Zhu asked Kang to "bring some covers" to Zhu.
 Kang agreed to do so, and they met shortly thereafter for lunch. I believe that Zhu needed the
 condoms in advance of Panteng's meeting with Stephens at the Motel 6.

1 vehicle, and Kang drove away from the airport.¹⁵ At 6:52 p.m., Kang called Zhu and said
2 that he "got it," referring to Liamurai. Zhu asked Kang to "keep her" at Kang's residence
3 for a while, and Kang agreed to do so. At 9:09 p.m., Kang told Zhu that he would make
4 "a delivery" at Zhu's house "in a minute," referring to dropping-off Liamurai at Zhu's
5 residence. My conclusion that Zhu and Kang were discussing the arrival of two
6 prostitutes in the above-referenced calls is supported by the fact that, in an intercepted
7 call later that same day, Kang told a friend that he had been very busy that day because
8 "two new persons" (prostitutes) had arrived.

9 **Call 581:** On June 16, 2006, at 2:04 a.m., Liamurai called Kang and said she "did
10 three" (serviced three customers). She then complained that there was no hot water or
11 towels where she was staying, so she could not take a shower.

12 **Call 625:** On June 17, 2006, Kang spoke to Liamurai about her forthcoming travel
13 arrangements. Liamurai stated that Delta Airlines has a flight for \$367.00 on July 4,
14 2006, to Scranton (Pennsylvania) International Airport, but if Kang could find a cheaper
15 flight that would be good. Liamurai further stated that she talked to "her," and "she" said
16 that July 3rd would be okay. Kang asked whether July 5th also was okay, and she replied
17 that it was. Kang said he would call Liamurai later. I believe that Liamurai was referring
18 to Jiang during this conversation. Specifically, I believe that Liamurai was telling Kang
19 that Jiang approved of her leaving Seattle on either July 3rd or July 5th, and that Kang
20 was going to arrange the travel for Liamurai.

21 **Call 645:** On June 19, 2006, Liamurai asked Kang whether he wanted to "go with
22 them to bring the money and passport" to an unspecified person. Liamurai stated that
23 they would be able to see the person between 1:00 p.m. and 3:30 p.m. Based on prior
24

25 ¹⁵ Liamurai was identified by cross-referencing the arriving flight manifest with names of
26 prostitutes for whom Kang's email account had been used to purchase tickets in the past.
27 Specifically, Kang's email account was used to purchase tickets for Liamurai on three occasions
28 in 2005; and, her name appeared on the manifest for the arriving Alaska Airlines flight.
Liamurai also was subsequently observed in the presence of Kang and Zhu on numerous
occasions, after which law enforcement officers positively identified her by reviewing her
driver's license photograph. According to ICE records, Liamurai is a Thai national who is an
illegal alien in the United States, by virtue of overstaying an expired temporary visa.

1 intercepted conversations, I believe that Liamurai was referring to visiting Panteng at the
2 ICE detention facility, to provide Panteng with her passport and some money.

3 **Calls 2141-2147 (TT2):** On June 19, 2006, between 1:42 p.m. and 3:10 p.m.,
4 Kesheng Zhu answered TT2 and spoke to several of Kang's brothel customers. During
5 these calls, Zhu was at Kang's brothel, and was assisting Kang in fielding calls from
6 customers. Zhu provided customers with the new brothel address (4411 11th Avenue
7 South); Zhu told customers that there were two Thai prostitutes and one Malaysian
8 prostitute working at the brothel; he advised customers whether the prostitutes were
9 available at the time; and he encouraged customers to visit the brothel. For example, one
10 customer identified himself as someone who "a girl could not handle" the last time,
11 referring to the size of his penis. Zhu described the current prostitutes to the customer,
12 and encouraged him to "check things out."

13 **Call 681:** On June 21, 2006, Kang told Liamurai that he was at "the company,"
14 referring to his brothel. Kang asked, "How many did you do?" referring to how many
15 customers she serviced that day. Liamurai explained that she had three customers, but
16 one wanted to "do it twice." Kang replied, "You did four, is that right?" Liamurai
17 clarified, "I had three customers, but I did it four times." Liamurai provided Kang with
18 some details about the customers, including the fact that one of them pulled her hair and
19 gave her a headache.

20 **Call 759:** On June 22, 2006, Liamurai told Kang that she just returned from work.
21 Kang asked, "The first one?" and she responded affirmatively, indicating that she had just
22 serviced her first customer that day.

23 **Calls 766, 812:** On June 23, 2006, Liamurai told Kang that she "did" three that
24 day, referring to servicing three customers. Later that day, Zhu complained to Kang that
25 "it was a slow day," referring to the number of customers at his escort service.

26 **Call 822:** On June 24, 2006, at 1:10 p.m., Zhu told Kang that "an old customer"
27 made an appointment for 12:30 p.m. that day, and Zhu was waiting for Liamurai to finish
28 with the customer.

1 **Call 873:** On June 26, 2006, Kang reminded Liamurai that she had "an
2 appointment" the following day. Kang told her to "hook in the john" (the prospective
3 customer) because he is "a gold mine."

4 **Calls 990, 997:** On June 29, 2006, Liamurai told Kang that she serviced two
5 "black men" as customers. Kang confirmed, "You did two, right?" Kang also reminded
6 Liamurai that she had an "appointment" with a customer the following day. Later, Kang
7 told Liamurai that he was "at the company" (the brothel) and was "waiting for a
8 customer." Liamurai told Kang that she had \$200.00 cash which she received from one
9 of her customers as payment for sex.

10 **Calls 1007, 1015:** On June 29, 2006, Zhu instructed Kang (who was beaded to
11 Zhu's residence) to park inside and let Zhu park behind Kang, because Zhu "needed to
12 send someone home later," referring to driving Liamurai to the airport. Later, Zhu
13 complained that he had not "got any calls yet tonight," referring to having received no
14 customer calls for his call-girl service. Kang asked whether Zhu's advertisement was
15 being published that day, and Zhu confirmed that it was.

16 **E. Undercover Investigation on June 27, 2006.**

17 On June 27, 2006, at 4:15 p.m., an undercover detective ("UC") called TT4 and
18 spoke to Jiang. The UC asked whether there were any "girls" available, and Jiang stated
19 that there was one. She further stated that the price was \$200.00. The UC asked Jiang to
20 send the girl at 6:00 p.m. to room 104 at the Travel Lodge hotel in Seattle. Jiang agreed
21 to do so.

22 At 4:55 p.m., Zhu used TT3 to call Liamurai. At 5:40 p.m., surveillance agents
23 observed Kesheng Zhu and Liamurai departing Zhu's and Jiang's residence in Zhu's
24 green Dodge Caravan. Zhu drove directly to the Travel Lodge, dropped-off Liamurai at
25 the front door at 5:57 p.m., and then parked the car. Zhu waited in the car as Liamurai
26 entered the hotel. Liamurai went to room 104, where she met with the UC at 5:59 p.m.
27 At 6:06 p.m., while Liamurai was in the hotel room, Zhu (using TT3) contacted Jiang
28 (using TT4) and they spoke for more than one minute. Meanwhile, the UC established an

1 "offer and acceptance" of sex from Liamurai, and then he received a pre-planned ruse
2 phone call. The UC told Liamurai that he had to leave because his "boss" just called, but
3 he Liamurai the \$200.00 fee anyway. She left the room, exited the hotel at 6:08 p.m., and
4 entered Zhu's vehicle. Surveillance agents observed Zhu and Liamurai talking and
5 counting money together in the vehicle. At 6:11 p.m., surveillance agents observed Zhu
6 and Liamurai depart the hotel parking lot and drive back to Zhu's and Jiang's residence.

7 **Call 920:** Later that night, on June 27, 2006, Liamurai told Kang about the
8 appointment with the UC. She stated that she did not "do her work" (have sex) because
9 the customer had to leave, but she still got paid.

10 **F. Surveillance of Kesheng Zhu on July 2, 2006.**

11 As described above, on July 2, 2006, surveillance agents were at Sea-Tac Airport
12 anticipating the arrival of a prostitute named "Yvonne," who was scheduled to work in
13 Kang's brothel. An officer observed an Asian female sitting outside the terminal waiting
14 for someone to pick her up. At approximately 4:30 p.m., Zhu, driving his green Dodge
15 Caravan, arrived at the airport and picked-up the Asian female. While en route, at 4:49
16 p.m., Zhu (using TT3) contacted Jiang (using TT4). Based on these circumstances, I
17 believe that this Asian female was "Yvonne," the prostitute who was scheduled to work at
18 Kang's brothel, and that Zhu transported her from the airport to the brothel to facilitate
19 the prostitution activities. I further believe that Zhu contacted Jiang to advise her that the
20 prostitute had arrived.

21 **G. Undercover Call to Rujing Jiang on July 10, 2006.**

22 On July 10, 2006, the UC called TT4 and spoke to Jiang. The UC asked whether
23 Jiang had any "girls" available. Jiang replied that she did not have any "girls" at the time,
24 but said one would arrive on Thursday, July 13, 2006. She advised the UC to call back
25 then to arrange an appointment.

26 //

27 //

28 //

H. Intercepted Conversations Over TT1 and TT2 (July 7th - July 20th).

Call 1074: On July 8, 2006, Liamurai told Kang that she as "working" in Los Angeles (at a brothel or an escort service). She further stated that she was going to return to Seattle on July 25, 2006, to work again as a call-girl for Zhu and Jiang. Liamurai stated that she was scheduled to work for Zhu and Jiang from July 27th through August 14th. She explained that Zhu asked her a few times to come back and work for him, and she finally agreed to do so. She complained, however, that Zhu's business was "not busy" (did not have many customers) and that he should at least pay for one-half of her plane ticket to Seattle. Liamurai further complained that "it was wrong for him [Zhu] to get more money while the girls are the ones who actually have to work."

Call 1148: On July 10, 2006, at 2:09 a.m., Kang and Liamurai talked for close to three hours. During this lengthy conversation, they discussed, among other topics, Kang's historical relationship with Kesheng Zhu and Rujing Jiang. Kang told Liamurai that he first moved to Seattle in 2003 because of Zhu. Kang explained that they had previously met in Denver, and that Zhu "helped" Kang when Zhu was "doing good," referring to Zhu employing Kang at his previous brothel, the Apple Spa. Kang stated that Zhu opened his "first brothel house" in Seattle in 2002, and later Zhu sold Kang the business for \$40,000. Kang further explained that "Jo Jo" (Liu) betrayed him, and that "Jo Jo" ended up with Kang's customer list. Based on this investigation, I interpret this comment to mean that Kang believes Liu was the person who sent the anonymous tip letter to the police in 2004, which led to the raid and closure of the Apple Spa. Kang told Liamurai that, after the Apple Spa raid, he went to Portland for while, and then returned to Seattle to "establish [his] business." Kang further stated that he likes Zhu, but does not like Zhu's "wife" (Jiang).

Calls 1152, 1167: On July 10, 2006, Liamurai told Kang that she would return to Seattle on July 25, 2006, at 2:30 p.m., and that Zhu was going to pick her up at the airport. Liamurai complained again that Zhu was not paying for the plane ticket. Kang advised Liamurai to look at her working relationship with Zhu "from the positive view,"

1 because it will enable her to "build up a customer base." She complained, however, that
2 Zhu does not have enough customers, so he "can't pay me enough."

3 Call 1153: On July 10, 2006, Zhu told Kang that "the Shanghai girl" who was
4 supposed to "come in" on July 13, 2006, cancelled her schedule to work for Zhu as a call-
5 girl. Zhu stated he was "desperate" to find a replacement prostitute, because he already
6 had an advertisement in the newspaper. Zhu asked Kang to check with "the Hong Kong
7 girl" who was willing to do "to-go service." Kang agreed to do so, and stated he would
8 get back to Zhu.

9 Call 1186: On July 11, 2006, Kang discussed his brothel business with Liamurai.
10 Among other things, he stated that he took a prostitute to the airport at 9:30 a.m.; that he
11 picked-up a prostitute at the airport in the morning; that he picked-up another prostitute at
12 the airport "after lunch"; that the "new ones" are Chinese and Korean; and that a "new"
13 Thai prostitute would arrive the following day. Kang also stated that Zhu "found another
14 one" (prostitute) who was "coming out from New York" on July 13, 2006, to work for
15 Zhu and Jiang.

16 Call 1198: On July 12, 2006, Kang told Zhu that he was "dropping someone off"
17 at the airport. Based on other intercepted calls, I am aware that Kang was transporting a
18 prostitute named "Kelly" from the brothel to the airport at the time of this call.

19 Calls 1297, 1304 (TT1); 3783, 3795 (TT2): On July 14, 2006, a prostitute named
20 "Ivy" called Kang and asked whether he had any availability at his brothel. She explained
21 that she lived in Renton, Washington. Kang stated that "Michael" (Zhu) would call her to
22 arrange a meeting, because he lived closer to Renton. Kang then called Zhu and
23 explained that a prostitute named "Ivy" saw Kang's "hiring ad" in the newspaper, and
24 called for work. Kang asked whether Zhu's "to-go service" could use Ivy. If so, Kang
25 suggested that Zhu call Ivy and meet with her (Kang provided Zhu with Ivy's phone
26 number). Zhu agreed to call Ivy and set up a meeting. Later, Zhu advised Kang that he
27 called Ivy, but he did not intend to employ her because she was "about 46 or 47 years old"
28 and she "doesn't even know one word of English."

1 **Call 1380:** On July 17, 2006, Kang and Zhu discussed Zhu's escort service. Zhu
2 told Kang that he had not had any customers yet that day, but the day before was "pretty
3 good" because he had "six-five," referring to an unknown number of customers. Kang
4 commented that Zhu was "continuing the progress," suggesting that Zhu's escort service
5 was slowly growing. Kang then told Zhu that the new brothel manager he was attempting
6 to hire (to replace Xie) would arrive the following day from California. In the meantime,
7 Kang said he was cooking for the prostitutes himself.

8 **Call 1416:** On July 18, 2006, Kang told Zhu that the "new person" who was
9 supposed to manage Kang's brothel "backed out." Kang stated that he was continuing to
10 look for someone to hire as a brothel manager.

11 **I. Intercepted Conversations Concerning Zhu's and Jiang's Escort
12 Service (July 20th through the present).**

13 On July 20, 2006, court-authorized wiretaps began over 626-679-1908 (TT3) and
14 206-753-9980 (TT4). Jiang used TT4 to field numerous calls from customer each day.
15 Jiang scheduled appointments for the prostitutes, and arranged to send the prostitutes to
16 customers' residences or hotel rooms. Zhu used TT3 to communicate with Jiang about
17 the appointments. Zhu then transported the prostitutes from appointment to appointment.
18 Among other things, the intercepted calls confirmed that Zhu and Jiang employed as
19 prostitutes young Asian women who traveled to Seattle from out-of-state, and that they
20 rotated prostitutes approximately every two weeks.

21 **Call 4 (TT3):** On July 20, 2006, Zhu told Liamurai (who was working in Los
22 Angeles at the time) that his business was "okay." Zhu stated that he had three or four
23 customers that day, and three customers the day before.

24 **Call 13 (TT3):** On July 20, 2006, Zhu spoke with a prostitute who stated that she
25 was working at a brothel in an unknown city. The prostitute stated that she "did eight
26 people" (customers) that day. She told Zhu that the owner of the brothel also operated a
27 second brothel in the same city. She said the owner was considering selling the second
28 brothel, and she and Zhu surmised that the sale may be motivated by the fact that the
police were watching the second brothel. Zhu warned her to "be careful." She then

1 described how busy the two brothels were. She stated that there were so many customers
2 that they were limited to 30 minutes each with the prostitutes, rather than the usual 60
3 minutes. She further stated that "all three rooms were doing it," referring to three
4 prostitutes being busy with customers. She told Zhu that in one day she serviced 22
5 customers, and that another prostitute serviced 35 customers on the same day. Again,
6 Zhu warned her to "be careful." She wished Zhu "good business."

7 **Call 5 (TT3):** On July 20, 2006, at 10:35 p.m., Zhu told Jiang that he just
8 delivered "the girl" (prostitute) to a hotel in Kirkland, referring to the fact that their
9 prostitute was servicing a customer at that time. Zhu then asked Jiang for the next
10 address. Jiang provided an address in Woodinville, Washington. Zhu confirmed with
11 Jiang that he should charge \$200 to the next customer. Jiang agreed, and stated that she
12 told the customer that Zhu would be there in one hour.

13 **Call 10 (TT3):** On July 20, 2006, at 11:15 p.m., an Asian female called Zhu. Zhu
14 asked where she was, and she stated that she was in the elevator "coming down now."
15 Zhu said he was "waiting downstairs." Based on this conversation, I believe that this
16 female was the prostitute, who was calling Zhu because she was finished with the
17 customer in the hotel.

18 **Calls 11, 12, 14, 15 (TT3):** On July 20, 2006, at 11:44 p.m., Zhu asked Jiang to
19 call the next "customer" and confirm that there was a boat in the driveway of his house.
20 Jiang agreed to do so. Two minutes later, Jiang called Zhu and asked whether he saw the
21 customer. Jiang further stated that he (the customer) "has to get money." Based on these
22 calls, I believe that Zhu and the prostitute had arrived at the customer's house in
23 Woodinville.

24 **Calls 14-15 (TT3):** On July 21 2006, at 1:21 a.m., Zhu told Jiang that he "just
25 made delivery" of the prostitute to another customer. Zhu said the customer paid him
26 \$300, and that "we" are going to keep \$120, and "give her "(the prostitute) \$130. Jiang
27 agreed. At 1:43 a.m., Zhu received a call from the prostitute, who handed the phone to
28 the customer. The customer asked Zhu to "pick up the girl" because he needed to "get

1 going." Zhu told the customer to "send the girl outside."

2 **Calls 32, 35-36, 49, 50 (TT3):** On July 21, 2006, at 10:57 p.m., Zhu called a
3 customer named "Lan" and stated that he (Zhu) was "the driver bringing the girl" to
4 Lan's house. At 11:05 p.m., Zhu called Lan and said he was having difficulty finding
5 Lan's apartment. Lan provided directions, and eventually Zhu stated that he saw Lan
6 standing outside. At 11:13 p.m., Zhu called Lan and asked him to "do it slowly if his
7 (penis) is too big," because "the Chinese girl is so skinny" that he might "hurt her if he is
8 doing it too hard." Lan agreed. At midnight, Zhu called Lan and stated that the time was
9 up, and told him to "tell the girl to go outside." At 12:06 a.m., Zhu asked whether the
10 "girl" was coming out yet. Lan stated that she was.

11 **Calls 37, 39, 40, 41, 52-54 (TT3):** On July 21, 2006, at 11:14 p.m., while the
12 prostitute was servicing Lan, Zhu called Jiang and stated that he just delivered "the girl
13 inside." Jiang provided Zhu with the phone number and address for the next customer,
14 who was at the Crown Plaza hotel in downtown Seattle. Jiang said she told the customer
15 the prostitute would be there in one hour. Jiang advised Zhu to "hurry to that next one
16 after you are done with this one." At 11:18 p.m., Zhu called the Crown Plaza and
17 confirmed the address. At 12:38 a.m., Zhu asked Jiang to tell the customer that he would
18 be there in two minutes. Two minutes later, Zhu called Jiang to confirm the customer's
19 room number. Jiang stated it was room 2458. At 12:44 a.m., Zhu confirmed for Jiang
20 that he just delivered "the girl up there." Zhu asked whether there were any more
21 customers that night, and Jiang stated that there were no more calls at that time.

22 **Based on these calls, surveillance agents responded to the Crown Plaza hotel.**
23 **Agents observed Zhu park his green Dodge Caravan outside the hotel, at which time the**
24 **prostitute exited the vehicle and walked into the hotel lobby. Zhu followed her into the**
25 **hotel, and spoke to her briefly in the lobby. Zhu and the prostitute then entered the**
26 **elevator and went up to the 24th floor. Agents watched as they both walked to room**
27 **2458. The prostitute entered room 2458, and Zhu took the elevator back to the lobby.**
28 **Zhu then exited the hotel and waited for the prostitute in his vehicle. At 1:30 a.m., Zhu**

1 | went back into the lobby and met with the prostitute. They both exited the hotel and
2 | drove away in Zhu's Dodge Caravan.

3 | **Calls 55-58 (TT3):** On July 22, 2006, at 1:07 a.m., while the prostitute was
4 | servicing the customer at the Crown Plaza hotel, Jiang told Zhu that the next customer
5 | lived on 13th Avenue South, Seattle. Jiang stated that she told the customer the prostitute
6 | would be there at 1:45 a.m. Jiang provided Zhu with the address and phone number for
7 | the customer. Jiang further stated that after the customer at 13th Avenue there was a
8 | "Mexican customer" in Sea-Tac. Jiang said she told the Mexican customer that he would
9 | have to wait approximately 90 minutes. At 1:18 a.m., Jiang provided Zhu with the
10 | address for the Mexican customer in Sea-Tac. Zhu told Jiang that the prostitute was "not
11 | out yet" from the Crown Plaza hotel. Jiang commented that she hoped "the girl" was not
12 | enjoying the air conditioning and the comfort of the hotel so much that she fell asleep. At
13 | 1:35 a.m., Zhu called the customer on 13th Avenue and stated that he was "driving the
14 | girl" to his house. As Zhu approached, he stated that he saw the customer standing
15 | outside the house. At 1:39 a.m., Zhu advised Jiang that "the girl just went in." At the
16 | same time, surveillance agents observed Zhu attempting to park his green Dodge Caravan
17 | on 13th Avenue South.

18 | **Calls 62-64 (TT3):** On July 22, 2006, at 2:10 a.m., Zhu called the customer in
19 | Sea-Tac and stated that he was bringing "the girl" to his house and would be there in ten
20 | minutes. At 2:26 a.m., when Zhu arrived at the house, he called the customer and told
21 | him to "come down and take the girl upstairs." At 2:32 a.m., Zhu advised Jiang that "the
22 | girl went in." He further stated that the customer paid him \$220.00, including a \$20.00
23 | tip. Zhu told Jiang that he advised the customer to "do it slowly and softly because his
24 | thing (penis) is so big." Jiang stated that if more customer calls came in, Zhu may have to
25 | "work until sunrise." Zhu stated that he did not mind.

26 | **Call 78 (TT3):** On July 23, 2006, at 12:47 a.m., Jiang advised Zhu that a customer
27 | had to cancel that night "because his girlfriend came over." Jiang stated that the customer
28 | would "order again tomorrow."