

1 Call 98 (TT3): On July 24, 2006, at 1:20 a.m., Jiang told Zhu that she previously
2 gave him the wrong phone number (for a customer), and she provided the correct number.
3 Jiang told Zhu to let her know if he could not locate the customer.

4 Call 100 (TT3): On July 24, 2006, at 2:08 a.m., Jiang told Zhu that the customer
5 who previously only paid \$150.00 for 30 minutes "called and asked for the same deal."
6 Zhu asked how much the customer was going to pay this time. Jiang said she asked for
7 \$160.00, but the customer would only pay \$150.00. Zhu agreed to do this "for the last
8 time," and emphasized that the customer would be limited to 30 or 40 minutes.

9 Calls 104-107 (TT3): On July 24, 2006, at 2:45 a.m., Jiang attempted to direct
10 Zhu to another customer's residence, but Zhu had difficulty getting through a security
11 door which required a code. Zhu asked Jiang to call the customer, and she later advised
12 Zhu that the customer was not answering the phone.

13 Call 1572 (TT1); 4608 (TT2); 121 (TT3): On July 24, 2006, a customer named
14 "Carl" called Kang at TT2 and asked whether Kang had any "girls" (prostitutes). Kang
15 offered to "send a girl over" to Carl's house. Carl explained that he was married, so he
16 would have to meet the prostitute at a hotel. Carl asked how much the prostitute would
17 cost. Kang replied, "I don't know," and said that "the lady" would call Carl directly.
18 Kang then called Zhu, and told Zhu to contact Carl because he wanted "to go service."
19 Shortly thereafter, Zhu used TT3 to call Carl. Zhu explained that he had a Chinese
20 prostitute who did "out-calls only," and that the cost was \$200.00 "cash." Carl stated that
21 he would look for a hotel and call Zhu later.

22 Call 266, 268, 270, 275, 294, 297 (TT4): On July 24, 2006, several customers
23 asked Jiang to describe the prostitute, and asked how much she cost. Jiang told the
24 customers that the prostitute's name was "Lily," and that she was Chinese, 22-years-old,
25 five feet and four inches tall, and 105 pounds. Jiang further stated that the price was \$200
26 "cash only" for one hour.

27 Call 272 (TT4): On July 24, 2006, Jiang called a customer named "Richard" and
28 advised him that she had "a new Chinese girl" who had been in Seattle for ten days and

1 would be leaving in three days. Richard stated that he was "a little short (of money)
2 now," and would "do it another time."

3 **Call 273 (TT4):** On July 24, 2006, a customer told Jiang that he saw the
4 advertisement in the Seattle Weekly and wanted "a girl" at the Best Western hotel in
5 Auburn. When Jiang stated that the price was \$200 cash, the customer said he did not
6 have that much money.

7 **Calls 274, 283-85, 287 (TT4); 124-25, 128-29 (TT3):** On July 24, 2006, at 8:40
8 p.m., a customer named "Eric" called to confirm his appointment with Jiang's prostitute
9 at 10:00 p.m. that night. At 9:25 p.m., Jiang called Zhu and asked why he had not "left
10 for the 10:00 p.m. appointment." Zhu stated that he did not know about the appointment,
11 but would be on his way. Zhu asked Jiang to let the customer know that "the girl left
12 already." At 9:37 p.m., Jiang confirmed with Eric that he still wanted "the girl to go
13 over." At 10:03 p.m., Eric called Jiang and stated that "the girl" had not "shown up yet."
14 Jiang stated that she should be "very close." Eric said he would "wait outside."
15 Immediately thereafter, Jiang advised Zhu that the customer was waiting for him in the
16 parking lot. Zhu stated that he was at the location, but did not see the customer. Jiang
17 then called Eric and told him the prostitute had arrived. At 10:07 p.m., Zhu called Jiang
18 and advised her that he found the customer. Zhu stated that Eric was "a young African-
19 American," and Jiang expressed surprise because he did not "sound like that over the
20 phone." Zhu agreed. Jiang asked whether the customer paid, and Zhu said he paid \$200
21 plus a \$30 tip "for the girl."

22 **Call 293 (TT4):** On July 24, 2006, Jiang described Lily to a customer, and stated
23 that she provides "full service" for \$200 cash per hour. Jiang further said that "the girl
24 works 24 hours a day."

25 **Calls 302, 307, 321, 331, 333, 338 (TT4):** On July 25, 2006, Jiang spoke to
26 numerous customers. Jiang advised the customers that the price for the prostitute was
27 "\$200 in cash for one hour." Jiang also told various customers that the price for 30
28 minutes was \$160; that the price for two hours was \$380; that the prices were not

1 negotiable; that the prostitute would not engage in anal sex; and that the prostitute was
2 "34B-28-32."

3 **Calls 303, 310 (TT4); 148-50 (TT3):** On July 25, 2006, at 1:38 a.m., a customer
4 ordered a prostitute from Jiang, to be sent to Room 305 of the Highway Inn in Edmonds,
5 Washington. Between 1:54 a.m. and 2:15 a.m., Jiang gave Zhu directions to the hotel as
6 he drove there. At 2:21 a.m., Zhu told Jiang that "it was delivered," referring to the fact
7 that the prostitute was with the customer. At 2:32 a.m., Jiang confirmed with Zhu that he
8 "sent the girl in."

9 **Calls 334, 335, 337 (TT4):** On July 25, 2006, at 7:35 p.m., a customer named
10 Jeremy ordered a prostitute from Jiang, to be sent to a hotel in Bothell, Washington at
11 10:00 p.m. The customer asked for the rate if he were to "keep" the prostitute for two
12 hours. Jiang stated the cost was \$380. At 9:20 p.m., Jiang confirmed the appointment
13 with Jeremy. Jeremy stated that "the girl should be able to walk in (to the hotel) this
14 time," suggesting that he previously had ordered a prostitute from Jiang. At
15 approximately 10:00 p.m., Zhu told Jiang that "the girl already went in."

16 **Calls 342, 345, 347-56 (TT4); 172, 174, 185 (TT3):** On July 25, 2006, at 10:32
17 p.m., a customer named John ordered a prostitute from Jiang, to be sent to the Holiday Inn
18 in Kent, Washington. Jiang told John that the prostitute would be there in 30-40 minutes.
19 Immediately thereafter, Jiang told Zhu that the "next delivery" was to the Holiday Inn.
20 Zhu called the Holiday Inn to verify the address. At 10:45 p.m., Zhu called the prostitute
21 and told her that there was "another one (customer) waiting for her." At the time, the
22 prostitute was still with Jeremy at the hotel in Bothell. Zhu told the prostitute to ask
23 Jeremy whether she could leave. At 10:57 p.m., Zhu told Jiang to call the customer and
24 tell him "the girl" would be there in 25-30 minutes. Jiang then called John to advise him
25 of the same. Over the next half hour, Jiang spoke to both Zhu and John, to assist them in
26 finding each other. Among other things, Jiang told John that "the girl" has a driver
27 named "Michael" (Zhu). At 11:41 p.m., Zhu advised Jiang that he "found the customer."
28 At 12:26 a.m., the prostitute called Zhu to tell him that she was outside waiting for him,

1 suggesting that she just finished servicing John.

2 **Call 183 (TT4):** On July 26, 2006, at 12:24 a.m., Zhu asked Jiang whether there
3 were "any more calls coming in" (from customers). Jiang stated that there were none.

4 **Calls 358, 360-61, 368, 375, 390 (TT4):** On July 26, 2006, Jiang spoke to
5 numerous customers. Among other things, Jiang stated that the price for the prostitute
6 was \$200 cash for "only one hour," and the price for 30 minutes was \$160. One customer
7 asked Jiang whether the prostitute would "have sex" with his girlfriend, or with both him
8 and his girlfriend. Jiang replied that the prostitute "doesn't do that."

9 **Calls 372, 384-87, 389 (TT4); 201 (TT3):** On July 26, 2006, at 1:47 p.m., a
10 customer named Dan called and requested information regarding a "massage." Jiang
11 explained that it was "out call only," the price was \$200 for one hour, "the girl" was
12 Chinese, and she was 22-years-old. Dan said he would call back later. At 10:07 p.m.,
13 Dan called Jiang and ordered the prostitute, to be sent to the Doubletree hotel near Sea-
14 Tac Airport. Immediately thereafter, Jiang told Zhu that "there is a job" at the Doubletree
15 hotel. At 10:19 p.m., Jiang advised Dan that the "girl is leaving now, and will be there in
16 twenty minutes." At 10:47 p.m., Zhu told Jiang that he "delivered the girl." At 11:23
17 p.m., the prostitute told Zhu she was ready to be picked-up, suggesting that she was
18 finished servicing Dan.

19 **Call 392 (TT4):** On July 26, 2006, at 10:58 p.m., Zhu asked Jiang whether there
20 were any more "business calls." Jiang said there were none. Jiang explained that she did
21 not "take a job" which paid "\$150 for half an hour," referring to a customer who had
22 requested to pay only \$150 for 30 minutes with the prostitute.

23 **Calls 203, 214-15 (TT3):** On July 27, 2006, a series of calls were intercepted
24 concerning Zhu's facilitation of interstate travel by "Lily," the prostitute who had been
25 working at Zhu's and Jiang's escort service. At 11:27 a.m., Zhu told Thongyot Liamurai
26 that he was "coming back from the airport." At 6:48 p.m., Lily called Zhu and asked him
27 what airport she just arrived at. Zhu stated she was at JFK airport in New York. At 6:57
28 p.m., Lily asked Zhu what airline she was taking the next day. Zhu stated it was Jet Blue.

1 **Based on these calls, I believe that Zhu transported Lily to Sea-Tac Airport, and arranged**
2 **for her to travel to New York and then to another (unknown) destination.**

3 **Calls 408, 433 (TT4):** On July 27, 2006, Liamurai began working as a prostitute at
4 **Zhu's and Jiang's escort service (Liamurai replaced Lily). Jiang told several customers**
5 **that the prostitute was from Singapore, and she described Liamurai's physical features.**
6 **Jiang assured one customer that "the girl treats men well and provides full service." On**
7 **July 28, 2006, Jiang told a customer that "the new girl went home yesterday" and "Laura"**
8 **is back, referring to Liamurai.**

9 **Calls 212, 220 (TT3):** On July 27, 2006, Liamurai asked Zhu whether there were
10 **any "calls" (from customers). Zhu stated that there were no calls yet, and that he would**
11 **meet Liamurai later when the customers called.**

12 **Calls 416 (TT4); 222-26 (TT3):** On July 28, 2006, at 1:26 a.m., a customer called
13 **Jiang and ordered "the girl" (Liamurai) to be sent to his apartment in Wallingford. Jiang**
14 **then called Zhu, and provided him with directions to the apartment. At 1:56 a.m.,**
15 **Liamurai called the customer and explained that she and Zhu were having difficulty**
16 **finding the customer's building. When they finally arrived, the customer told Liamurai**
17 **that he would "come down" to get her. At 1:59 a.m., Zhu told Jiang that he "delivered the**
18 **girl." At 2:40 a.m., Liamurai called Zhu and asked where he was, indicating that she was**
19 **finished servicing the customer. Zhu stated that he was just across the street.**

20 **Calls 1711 (TT1); 4985, 5062 (TT2):** On July 28, 2006, Liamurai complained to
21 **Kang about her work at Zhu's and Jiang's escort service. Liamurai stated that she only**
22 **"did one customer" the night before. She complained about how few customers Zhu and**
23 **Jiang had, and stated that if they did not have more customers the next night, she was**
24 **going to leave Seattle and work at "another house" (brothel) in California. She explained**
25 **that she could not "stay here" (Seattle) if she "can't make money." Liamurai mentioned**
26 **other brothels at which she could work and make enough money "to survive." Kang**
27 **advised Liamurai to "see how things go" over the weekend, because those should be "the**
28 **busiest days." Liamurai confided in Kang that she had not mentioned to Zhu and Jiang**

1 that she might leave. Kang advised Liamurai to give Zhu and Jiang advance notice, but
2 Liamurai refused to do so, stating that she would "give them one last chance tonight."

3 **Calls 443-44 (TT4); 236 (TT3):** On July 28, 2006, at 10:38 p.m., a customer
4 named Jeff called Jiang and ordered a prostitute to be sent to his house on 92nd Street
5 N.E. in Seattle. Jiang told the customer that "the girl is leaving now." At 11:08 p.m.,
6 Zhu told Jiang that he "sent her in." Ten minutes later, Liamurai called Zhu and said she
7 "was finished" (servicing the customer). Zhu told Liamurai where he was waiting.

8 **Calls 452-55 (TT4); 237-38, 241 (TT3):** On July 29, 2006, at 1:19 a.m., a
9 customer named Michael requested that Jiang send a prostitute to his house in Tukwila,
10 Washington. Jiang told Michael that because he was so far away, she would charge him
11 \$250. After Michael complained, Jiang agreed to the normal price of \$200. Jiang stated
12 "the girl" would be there in 30 minutes. At 1:28 a.m., Zhu told Liamurai that he was
13 coming to pick her up (so she could service Michael). At 1:51 a.m., Zhu told Jiang that
14 "the girl just went in." At 2:08 a.m., Michael called Jiang to complain about Liamurai's
15 service. Michael stated that "the girl" did not want him to touch her, and she only offered
16 to provide oral sex. Michael further stated that "the girl" took \$100 and left. Jiang
17 scolded Michael by saying, "You should not have put your finger inside, and the girl was
18 scared." Michael asked Jiang to send another "girl." Jiang stated that she only had one
19 "girl," but he could call another time because she "changes the girl every two weeks."
20 Immediately thereafter, Jiang called Zhu and asked what was going on. Zhu told Jiang
21 that the customer "used his finger" and tried to use "a fake one," referring to a dildo.
22 Jiang confirmed with Zhu that the customer paid \$100.

23 **Calls 1721-22 (TT1):** On July 29, 2006, at 2:12 a.m., Liamurai told Kang that
24 "there was a problem" with a customer and she "refused to work." Liamurai explained
25 that she "refused to take" one of Zhu's customers because he tried to use a dildo which
26 was "too big." She then described other sexual actions that the customer took. She said
27 she refused, and just took \$100 and left. Kang warned her "not to say this stuff over the
28 phone." Kang said they could talk about it more when she "comes over" to his place.

1 **Calls 245, 256 (TT3):** On July 29, 2006, Liamurai called Zhu to ask whether any
2 customers had called for appointments. Zhu said there were no calls yet, but that he
3 would let her know when the customers called.

4 **Calls 515, 520 (TT4); 258, 265-66 (TT3):** On July 29, 2006, at 10:55 p.m., a
5 customer named Darnie asked Jiang to send a prostitute to the W Hotel in downtown
6 Seattle. Darnie said he would wait for the prostitute in the bar downstairs. Jiang stated
7 that the prostitute would be there in 30-40 minutes. At 11:05 p.m., Zhu told Liamurai that
8 he was on his way to pick her up (to take her to the W Hotel). Subsequently, Jiang and
9 Zhu discussed the fact that they were having difficulty getting in touch with Darnie.
10 Based on the intercepted calls, it is unclear whether or not Liamurai eventually serviced
11 Darnie.

12 **Calls 518-19, 521-22 (TT4):** On July 29, 2006, at 11:16 p.m., Jeff (a customer)
13 asked Jiang to send Liamurai to his house on 92nd Street N.E. in Seattle. Jiang realized
14 that Jeff ordered Liamurai the night before, and she pointed out that she "still had the
15 same girl." Jeff said that he did not mind the "same girl." Jiang then advised Zhu to take
16 Liamurai to Jeff's house. At 11:23 p.m., Zhu asked Jiang to let Jeff know that "the girl"
17 would be there in 15-20 minutes. Jiang called Jeff and told him the same.

18 **Call 529 (TT4); Call 273 (TT3):** On July 30, 2006, at 12:04 a.m., SPD officers
19 conducted a ruse traffic stop of Zhu's Dodge Caravan. Zhu was driving the vehicle, with
20 Liamurai in the passenger seat. Zhu presented a Washington State driver's license in the
21 name of "Guangqiang Shao," with a listed address of 6401 24th Avenue S., Seattle (Zhu's
22 and Jiang's former address). Liamurai presented officers with a California driver's
23 license in her own name. Immediately after the traffic stop, Zhu called Jiang and
24 explained that he had just been stopped by the police for making a turn without a signal.
25 Zhu said the police officer took his driver's license and insurance card, but just gave him
26 a warning, not a ticket. Jiang scolded Zhu for not being "careful enough." Jiang stated
27 that, given Zhu's "situation" (Zhu is an illegal alien), he should be more careful when he
28 drives in the "middle of the night." Based on these circumstances, and on the fact that

1 Zhu is an illegal alien, I believe that Zhu possesses a driver's license under a false name
2 in order to conceal his true identity from law enforcement officers.

3 Call 531 (TT4): On July 30, 2006, at 12:17 a.m., a customer told Jiang that he
4 "never had sex before" and asked whether "this would be a good first time." Jiang
5 replied that she had one "girl," who was a 24-year-old Thai. The customer stated that he
6 would call back later.

7 Call 536 (TT4); Call 276 (TT3): On July 30, 2006, at 2:24 a.m., a customer asked
8 Jiang to send a prostitute to his house on 14th Avenue N.W. in Seattle. Jiang stated that
9 "the girl will be there in 20-30 minutes." At 2:56 a.m., Zhu called the customer and
10 stated that he was outside the house, but did not see the customer. The customer said he
11 would be "right there."

12 Calls 1740, 1745 (TT1): On July 30, 2006, Liamurai told Kang that a "customer"
13 (at Zhu's and Jiang's escort service) cancelled last night, and another customer called at
14 2:00 a.m. Liamurai also told Kang that she referred one of Zhu's customers to Kang's
15 "place" (brothel). She explained that the customer was Vietnamese, and he "wanted to do
16 it two times" with her the night before.

17 Call 293 (TT3): On July 30, 2006, a prostitute named "Kiki" told Zhu that she
18 booked the plane ticket for August 14, 2006. Kiki stated that she would provide Zhu with
19 the specific itinerary "later on." Based on this call, I believe that Kiki was scheduled to
20 travel to Seattle for the purpose of working as a prostitute at Zhu's and Jiang's escort
21 service.

22 Calls 563, 566-67 (TT4); 289, 292, 294 (TT3): On July 30, 2006, at 10:51 a.m., a
23 customer named "Ken" requested that Jiang send a prostitute to the Red Lion hotel in
24 downtown Seattle. Jiang stated the "girl" (Liamurai) would be there in 30 minutes. At
25 11:06 a.m., Zhu asked Jiang to call Ken and tell him that "the girl will arrive in fifteen
26 minutes." Jiang then informed Ken that "the girl" was on her way. At 11:33 a.m., Zhu
27 confirmed for Jiang that "the girl has been inside (with Ken) for a while already." At
28 11:49 a.m., Liamurai called Zhu and stated that she was "outside," suggesting that she

1 had finished servicing Ken. Zhu told Liamurai to "wait at the door." Shortly thereafter,
2 surveillance agents observed Liamurai enter Zhu's green Dodge Caravan outside the Red
3 Lion hotel.

4 **Calls 571, 575 (TT4); 297 (TT3):** On July 30, 2006, at 12:21 p.m., a customer
5 called Jiang and stated that he saw the advertisement in the newspaper. He requested that
6 Jiang send "a girl" to the Motel 6 in Kirkland. Jiang stated that "the girl's name is Laura"
7 (referring to Liamurai) and that she would be at the hotel in 45 minutes. Three minutes
8 later, while Zhu and Liamurai were en route to the Motel 6, Zhu called the motel for
9 directions.

10 **Calls 582, 584 (TT4); 299, 301-04 (TT3):** On July 30, 2006, at 1:11 p.m., a
11 customer asked Jiang to send a prostitute to the Everett Inn. The customer asked for a
12 cheaper rate than the usual \$200, because he "already paid \$100 for the room." Jiang
13 refused to lower the price, and the customer eventually agreed to pay \$200. At 1:30 p.m.,
14 Zhu called the Everett Inn and asked for the customer's room. Zhu then handed the
15 phone to Liamurai, who told the customer that she was on her way and would be there in
16 30 minutes. At 1:37 p.m., Jiang asked Zhu to have Liamurai "give the customer a call,"
17 but Zhu explained that they had already contacted the customer. At 1:42 p.m., Jiang told
18 Zhu to make sure the customer was going to pay \$200, and not \$150. Zhu agreed. At
19 2:07 p.m., Liamurai used TT3 to call the customer, who gave her directions to the hotel.
20 At 2:14 p.m., Zhu told Jiang that "the girl (Liamurai) has gone in."

21 **Call 632 (TT4); 320 (TT3):** On July 31, 2006, a customer asked Jiang whether it
22 was okay for his "wife to join in" with the prostitute. Jiang replied, "No," and terminated
23 the call. Shortly thereafter, Zhu told Liamurai that a customer called Jiang and "wanted
24 to do this in the presence of his wife." Zhu expressed surprise, asking, "How can it be
25 done like this?" Liamurai agreed, stating that she would not "do it like this."

26 **Call 320 (TT3):** On July 31, 2006, at 1:27 p.m., Liamurai called Zhu and asked
27 whether there were any calls from customers that day. Zhu stated that there were no calls
28 yet.

1 **Calls 637-40, 642 (TT4):** On July 31, 2006, at 4:15 p.m., a customer named
2 "Fang" told Jiang that he was near Sea-Tac Airport, and would call back for a prostitute
3 when he found a hotel. At 4:41 p.m., Fang told Jiang to send the prostitute to the Travel
4 Joy Motel in Sea-Tac. Jiang stated that "they" (Zhu and Liamurai) would be there in 30
5 minutes. At 5:27 p.m., Zhu told Jiang that "the girl went in."

6 **Call 644 (TT4):** On July 31, 2006, a customer asked Jiang whether the "girl does
7 dancing only, or sex." Jiang replied, "It's full service," referring to the fact that sex is
8 involved.

9 **Call 331 (TT3):** On July 31, 2004, at 9:25 p.m., Zhu told Liamurai that he would
10 call her "as soon as there is business."

11 **Calls 655-56 (TT4); 332-35 (TT3):** On August 1, 2006, at 12:17 a.m., a customer
12 asked Jiang about "the lady." Jiang stated that "the lady" was 24-years-old, and from
13 Singapore (describing Liamurai). Jiang assured the customer that "she is pretty." The
14 customer asked Jiang to send the prostitute to his apartment in Kirkland. Jiang told the
15 customer that "the girl" would be there in 45 minutes. At 12:25 a.m., Zhu called
16 Liamurai and arranged to pick her up in ten minutes. At 12:54 a.m., Liamurai used TT3
17 to call the customer. She stated that she was "in front of the building now," and asked
18 where the customer was. At 12:55 a.m., Zhu told Jiang that he "sent the girl in." Zhu
19 further stated that this was "an old customer" and that they "had a record about this guy."
20 At 1:14 a.m., Liamurai called Zhu after she finished servicing the customer. Zhu told her
21 he was waiting in his car "on the left hand side" as she exited the building.

22 **Calls 668 (TT4); 336 (TT3):** On August 1, 2006, a customer told Jiang that this
23 was his "first time doing this" (hiring a prostitute), and he asked for the price. Jiang
24 stated it was \$200 for one hour. The customer said he had \$300, and asked whether he
25 could get two prostitutes for that price, or have two hours with one prostitute. Jiang
26 explained that it cost \$380 for two hours, and that she only had "one girl." However,
27 Jiang agreed to let the customer have 90 minutes with the prostitute for \$300. The
28 customer stated that he would ask his friend and call back. Jiang then called Zhu to

1 discuss the situation. Jiang explained that she agreed to let a customer have 90 minutes
2 with Liamurai for \$300, but she was concerned because there were "two people." Zhu
3 suggested that they charge \$200 "for each person," and tell the customers that "they can
4 only do it one at a time, not together."

5 **Call 358 (TT3):** On August 1, 2006, Zhu spoke to a prostitute named "Mary."
6 Zhu introduced himself as "Michael from Seattle." Mary stated that she was currently
7 working (at a brothel) in Denver, and acknowledged that she was scheduled to work for
8 Zhu in September 2006. Zhu asked whether Mary could come right away, explaining that
9 he was "short of a girl for the next ten days." Mary declined, stating that she just started
10 working in Denver and was scheduled to stay there for one month. Zhu asked Mary to
11 contact him when her "work in Denver is finished," to arrange her travel to Seattle. Mary
12 agreed to do so.

13 **Calls 355-56, 359, 385, 392, 399 (TT3):** On August 1, 2006, Zhu confirmed with
14 a prostitute named "Coco" that she was scheduled to arrive in Seattle on August 14, 2006.
15 Coco confirmed that she already purchased "the ticket." Zhu asked whether Coco could
16 come earlier, explaining that his "girl" (Liamurai) was originally scheduled to work
17 through August 14th, but she just "left" (stopped working for Zhu). Coco stated that she
18 could not come any earlier, because she just started working (at a brothel) in Los Angeles
19 and was scheduled to be there for "one week to ten days." Zhu asked Coco to check with
20 her "boss" (the brothel operator) to see if she could leave and come to Seattle. On August
21 2, 2006, Zhu left a voicemail for Coco, stating that he wanted her to "come over as soon
22 as possible." Zhu also offered to "pay for the plane ticket." Coco called back and stated
23 that her "boss" would not "let her leave" until August 9, 2006. Zhu said that was "too
24 late," and asked Coco to check with her "boss" again. Zhu opined that it would be easy
25 for her "boss" to "find a girl in Los Angeles." Coco apologized, and offered to "refer
26 another girl" to Zhu. Zhu stated that he would "try to find another (prostitute)" himself.
27 Coco later advised Zhu that she purchased a ticket for August 9, 2006, arriving in Seattle
28 at 2:15 p.m., and that she would try to "come earlier" if possible. As summarized below,

1 Coco subsequently arranged to travel to Seattle on August 5, 2006.

2 Call 703 (TT4): On August 2, 2006, at 2:24 a.m., Jiang arranged to send a
3 prostitute to a customer's apartment on Corson Avenue South in Seattle. Jiang told the
4 customer that "the girl" would be there in 30-40 minutes. Interception over TT3 and TT4
5 terminated for the night shortly after this call.

6 Calls 714, 717, 719 (TT4); 384, 386, 394 (TT3): On August 2, 2006, at 10:09
7 a.m., a customer asked Jiang to send a prostitute to his house on N. 35th Street in Seattle.
8 Jiang stated that the prostitute would be there in 30 minutes. At 10:15 a.m., Zhu told
9 Liamurai that he was on his way to get her, because there was "work" at a customer's
10 house in Seattle. At 10:28 a.m., Zhu called Liamurai and stated that he was there to pick
11 her up. At 10:53 a.m., Jiang provided Zhu with the customer's phone number, and
12 suggested that Zhu have Liamurai call the customer. Liamurai then used TT3 to call the
13 customer, and asked him to verify his address. The customer stated that he would call
14 back, but he never called. At 11:05 a.m., Jiang told Zhu that the customer was not
15 answering his phone. Jiang stated that she was "afraid this would happen," because the
16 customer sounded "pretty hesitant" over the phone. Jiang told Zhu to "forget about it."

17 Call 1805 (TT1): On August 2, 2006, Liamurai told Kang that she was busy that
18 day because she "had two customers."

19 Calls 733, 737 (TT4); 419-20, 422, 425, 428 (TT3); 1815 (TT1): On August 2,
20 2006, at 6:57 p.m., a customer named Frank asked Jiang to send a prostitute to his
21 apartment in Tacoma. Jiang told Frank that the rate was \$250 per hour, and that "the girl"
22 would be there in 40-50 minutes. Immediately thereafter, Zhu called Liamurai and
23 arranged to pick her up. At 7:03 p.m., Liamurai told Kang that "a customer (was)
24 waiting" and Zhu was on the way over to get her. Liamurai said that she might "refuse
25 the customer" if he is too far away, because she was tired of driving long distances. At
26 7:06 p.m., Jiang gave Zhu directions to Frank's apartment in Tacoma. At 7:44 p.m.,
27 Liamurai used TT3 to call Frank, in order to confirm the directions. At 7:50 p.m., Zhu
28 told Jiang that "she already went in," referring to Liamurai meeting with Frank. Zhu

1 complained that Frank was black and "too big." Zhu stated that he told Liamurai "to do it
2 if she can do it, and just leave if she can't." At 8:22 p.m., Liamurai asked Zhu where he
3 was, suggesting that she finished servicing Frank. Zhu stated he was waiting "right in
4 front of the door."

5 **Calls 1823-24, 1827 (TT1):** On August 2, 2006, Liamurai told Kang that she "had
6 two customers" that day. Liamurai complained that Zhu "lied" to her about the location
7 of one of the customers (Frank), and they ended up driving 36 miles to Tacoma.
8 Liamurai said she would tell Kang "the whole story later," because she had a customer
9 waiting for her at the time.

10 **Calls 748, 750 (TT4); 434, 436, 439, 440 (TT3); 1831 (TT1):** On August 3, 2006,
11 at 12:06 a.m., a customer named Jesse requested that Jiang send a prostitute (Liamurai) to
12 his apartment in Seattle. Shortly thereafter, Zhu left a voicemail for Liamurai, stating that
13 there was "a customer" and asking her to call back. At 12:24 a.m., Jesse called Jiang to
14 cancel the appointment, stating that he had to "go to bed." Jiang then called Zhu and
15 advised him that "the customer cancelled the order." At 12:46 a.m., Zhu called Kang and
16 asked whether Liamurai was with Kang. Kang said she was not there "yet." Zhu
17 explained that he "had to cancel a customer earlier" because Liamurai did not call him
18 back. Zhu further stated that "now another one (customer) called" and he was still unable
19 to find Liamurai. Kang agreed to help Zhu contact Liamurai. At 12:56 a.m., Kang told
20 Zhu that Liamurai "does not want to work," and that when she did not answer the phone it
21 meant that she "does not want to work." At 1:02 a.m., Zhu asked Kang to verify whether
22 Liamurai did not want to work any more that night, or more generally. Zhu explained that
23 he may need to "find another girl to come earlier" if Liamurai no longer wanted to work
24 at all for him and Jiang. Kang agreed to check with Liamurai.

25 **Calls 752-53 (TT4):** On August 3, 2006, a customer requested that Jiang send a
26 prostitute to his house in Seattle. Jiang stated that "the girl" would be there in 20
27 minutes. Jiang subsequently called the customer and explained that "the girl is too sick to
28 come over," referring to the fact that Liamurai was not available because she no longer

1 wanted to work for Zhu and Jiang. Jiang further told the customer that he should call
2 back on August 9, 2006, because she would have "a new Chinese girl who is young and
3 pretty."

4 Calls 5601, 5603 (TT2); 1861, 1863 (TT1); 785, 786, 791 (TT4): On August 3,
5 2006, a prostitute called Kang at TT2 and asked whether he was "hiring." The prostitute
6 explained that she was calling for herself and a friend, and that they both lived in
7 Flushing, New York. Kang stated that he was not hiring, but advised the prostitute to call
8 TT4 (Jiang's phone number) for work. Kang then advised Zhu that a "girl" called him
9 "for a job," and he gave the "girl" the phone number for TT4. Zhu told Kang that he
10 already had a "girl" arriving the following day. Kang suggested that Zhu "make a
11 schedule for later," referring to booking the prostitutes for future dates. Subsequently,
12 one of the prostitutes called Jiang at TT4. She told Jiang her name was "Lily" and she
13 lived in Flushing, New York. Jiang explained: "What we do here is out-call for the
14 Americans." Jiang further stated that her prostitutes earn between \$300 and \$500 per day;
15 that they are paid \$100 "plus tips" for each customer, and that on most days there are
16 between two and five customers. When asked whether it was "safe" to do "out-calls,"
17 Jiang replied: "It is safer to do out-calls, because police will rarely call for service and do
18 it in their house." Lily told Jiang that she wanted to "make a schedule." Jiang said she
19 would have to call Lily back later, because her "husband (Zhu) does the schedule."
20 Immediately thereafter, Jiang called Zhu and scolded him for leaving without telling her.
21 Jiang explained that a "girl" called "about schedules," but she could not find Zhu. A few
22 minutes later, Lily's friend "Lisa" called Jiang and also asked to book a schedule. Jiang
23 explained to Lisa that "the job is pretty hard because we operate 24 hours a day." Jiang
24 further stated that on some days there are as many as seven or eight customers. Jiang also
25 explained that if Lisa works at the escort service, it would be "most convenient" for her to
26 live "at the store" (at Zhu's and Jiang's residence), because then Lisa would be available
27 whenever customers called. Later that day, Zhu advised Kang that Lily and Lisa called.
28 Zhu stated that he did not schedule them to work because they were too old.

1 **Calls 774, 782, 872-73 (TT4):** On August 3 and 4, 2006, Jiang told several
2 customers that she did not have anyone to "work," and that they should call back in one or
3 two days.

4 **Calls 443, 448, 450, 477, 485, 495, 504-05, 511, 514-15 (TT3):** On August 3-5,
5 2006, Zhu arranged for "Coco" to travel from Los Angeles to Seattle to work at the escort
6 service. On August 3, 2006, Coco told Zhu that she had a "big confrontation" with her
7 "boss" over the fact that she was leaving Los Angeles "early." Coco asked Zhu to call the
8 travel agency and check for flights, but Zhu stated he was not home and he asked Coco to
9 make the arrangements. On August 4, 2006, Coco told Zhu she would arrive the
10 following day at approximately 6:00 p.m. On August 5, 2006, at 11:15 a.m., Coco asked
11 Zhu to contact the travel agent (to pay for the ticket). Coco stated that her real name was
12 "Yung Ling Liu." Zhu then called the travel agent and provided the correct spelling of
13 Liu's name. The travel agent told Zhu that she would process the ticket after receiving
14 payment. At 3:05 p.m., Coco told Zhu that she was at the airport in Los Angeles, and
15 would arrive in Seattle at 6:40 p.m. Zhu told Coco to call again when she arrived. At
16 6:34 p.m., Coco called Zhu and stated that her plane just landed in Seattle. At 6:43 p.m.,
17 Zhu told Coco that he would be "there (the airport) in ten minutes," and that he was
18 "driving a green van" (Zhu's green Dodge Caravan). At approximately the same time,
19 surveillance agents observed Zhu depart his residence (3211 S. Othello Street, Seattle)
20 driving the Dodge Caravan. Zhu stopped briefly at Ning's residence, and then drove
21 directly to the arrivals area of Sea-Tac Airport. Agents observed a young Asian female
22 (Coco) enter the Dodge Caravan, and then Zhu drove directly from the airport back to his
23 residence.

24 **Calls 916, 918, 924, 926 (TT4); 519 (TT3):** On August 5, 2006, at 7:08 p.m., a
25 customer named "William" asked Jiang to send a prostitute to his house in Kent. Jiang
26 explained that the "girl" was "still at the airport," and would not be available for another
27 hour, referring to the fact that Zhu was at the airport picking-up Coco. At 7:55 p.m.,
28 Jiang told William that the "girl (could) go over now." Based on this call, surveillance

1 agents responded to William's house in Kent. At approximately 8:25 p.m., agents
2 observed Zhu's Dodge Caravan arrive at the house. An Asian female (Coco) exited the
3 vehicle and entered the residence. At 8:33 p.m., Zhu told Jiang that he "arrived" at
4 William's house. At 8:41 p.m., Coco called Zhu and stated, "It's finished." Coco
5 explained that "the customer didn't want a massage." Shortly thereafter, agents observed
6 Coco exit the house and enter Zhu's vehicle. Zhu then drove away from the area. At
7 8:42 p.m., Zhu told Jiang that the appointment was finished, and asked for the address of
8 the next customer.

9 Calls 937-940, 942, 945-46 (TT4); 528, 532, 537-38 (TT3): On August 3, 2006,
10 at 10:21 p.m., a customer named "John" asked Jiang to send a prostitute to room 245 at
11 the Quality Inn hotel in downtown Seattle. Immediately thereafter, Jiang called Zhu to
12 advise him of the new job. At the time, Zhu was waiting for Coco to finish servicing
13 another customer. Jiang told Zhu to call when he was ready to head over to the Quality
14 Inn. Shortly thereafter, Coco called Zhu and complained that the customer she was with
15 did "not want to use a condom." Zhu told Coco to insist that the customer use a condom.
16 At 11:05 p.m., Coco told Zhu that she was finished with the customer. Zhu stated that he
17 was waiting "at the door." Immediately thereafter, Zhu advised Jiang that he was heading
18 to the "next customer" (the Quality Inn). Jiang called John and stated that "the girl" was
19 "on her way over" and would be there in 15-30 minutes. At 11:34 p.m., Jiang informed
20 Zhu that John was in room 245 at the Quality Inn. At 11:45 p.m., Zhu told Jiang that "the
21 girl just went in." Based on these phone calls, surveillance agents responded to the
22 Quality Inn. Agents observed Coco enter the hotel lobby and walk up a flight of stairs.
23 As Zhu waited outside of the Quality Inn, he and Jiang discussed their profits from that
24 night. Jiang added the numbers and concluded that they made \$400 "so far." Jiang said
25 she hoped they would be busy all night, so the "expense of the rent and the airfare would
26 be covered," referring to the fact that they purchased Coco's plane ticket to Seattle, and
27 that Coco was staying at Zhu's and Jiang's residence. Zhu told Jiang that he thought
28 Coco "does her job well." Zhu explained that when a customer did not want to wear a

1 condom earlier that night, Coco told the customer that "it was all-right not to wear a
2 condom when she did the 'blow job,' but the customer had to wear the condom when
3 doing 'the job' (sexual intercourse)." At 12:05 a.m., Coco told Zhu that she was
4 "finished" (servicing John). Zhu said he would come pick her up. Shortly thereafter,
5 agents observed Coco exit room 245, depart the hotel, and get into Zhu's Dodge Caravan.
6 Zhu then drove away from the area.

7 **Calls 948-953 (TT4); 542 (TT3):** On August 6, 2006, at 12:24 a.m., a customer
8 asked Jiang to send a prostitute to his apartment on Capitol Hill. Jiang stated that "the
9 girl" would be there in 15-20 minutes. At 12:51 a.m., Zhu asked Jiang to call the
10 customer and ask how to "get through the gate." Jiang called the customer, who stated he
11 would "come downstairs now." Jiang then advised Zhu that the customer was "coming
12 downstairs to pick up the girl." At 12:53 a.m., Zhu told Jiang that "the girl went in." At
13 1:13 a.m., Coco called Zhu and stated that she was ready to be picked-up. Zhu said he
14 was waiting "across the street."

15 **Call 1075 (TT4):** On August 7, 2006, a customer asked Jiang to describe the
16 prostitute working at the escort service (Coco). Jiang described her as a 22-year-old
17 "Chinese girl." Jiang further explained that the price was "\$200 cash only for one hour."
18 The customer asked what the price would be if there were "two guys, each using a half-
19 hour." Jiang stated that the price per person for 30 minutes was \$160. Jiang refused to
20 agree to a lower price.

21 **Calls 573, 576 (TT3); 1080-84, 1086, 1088, 1090 (TT4):** On August 8, 2006, at
22 12:34 a.m., a customer named Bob asked Jiang to send a prostitute to his apartment in
23 Seattle. Bob explained, "The guy who brings the girl (Zhu) knows me." At 1:02 a.m.,
24 Jiang advised Bob that "the girl is on the way now." At 1:17 a.m., Zhu told Jiang that he
25 was "at the customer's place." Zhu asked Jiang to tell the customer to open the front
26 door. Jiang called Bob, and then advised Zhu that the customer was "coming down now."
27 At 1:21 a.m., Zhu told Jiang that "the girl got in." Zhu described Bob as "about 50 or 60
28 years old." At 1:40 a.m., Coco called Zhu and stated that she was "finished" with Bob.

1 Zhu told her to "come down." During two subsequent calls, Bob complained to Jiang
2 about Coco's service. Bob said "the girl was lousy" and "this was a rip-off." Jiang
3 apologized, stating that "the girl is a new one" who "just came two days ago." Bob
4 replied that Jiang previously sent him "good girls before, but this girl is no good." Bob
5 further explained that "Coco was scared the whole time and wouldn't do a 'blow-job.'"
6 Jiang apologized again, and stated that she would tell Coco to "go away" and that she
7 would "get a new girl." After speaking with Bob, Jiang advised Zhu that the customer
8 "was not happy with the girl."

9 **Calls 580-81 (TT3); 1091 (TT4):** On August 8, 2006, at 2:47 a.m., a customer
10 requested that Jiang send a prostitute to his apartment in Kirkland. Jiang stated, "The girl
11 is leaving right now." At 3:28 a.m., Zhu called the customer and identified himself as
12 "Michael the driver." Zhu stated that he would "send the girl up there." At 3:29 a.m.,
13 Zhu told Jiang that Coco "went in."

14 **Calls 574 (TT3); 1984, 2011 (TT1):** On August 8, 2006, Zhu complained to Kang
15 that his business was slow. Zhu stated he had two customers so far that night, one
16 customer the day before, and five customers the day before that. Kang asked about the
17 "new Hunan girl," referring to Coco. Zhu stated that she was "okay." Zhu then asked
18 Kang for the phone number of the company from which Kang buys "covers" (condoms).
19 Kang asked "how many" Zhu wanted to order, and Zhu replied, "one box." Kang said he
20 would "place an order" for both of them, because Kang also needed more condoms.

21 **Calls 1107-09 (TT4); 608-09, 611-12, 617-18 (TT3):** On August 8, 2006, at 8:45
22 p.m., a customer named Wayne asked Jiang to send a prostitute to the W Hotel in
23 downtown Seattle. Jiang stated that the prostitute's name was "Coco," and that she would
24 be there in twenty minutes. Immediately thereafter, Jiang told Zhu to "come home
25 because there is work to do." At 8:53 p.m., Jiang provided Zhu with driving directions to
26 the hotel. At 9:12 p.m., Zhu told Jiang that "the girl went in." At 9:30 p.m., Coco called
27 Zhu and asked whether the customer "ordered" 30 or 45 minutes. Zhu stated, "It should
28 be one hour." Coco then explained that she was "still doing the massage." At 9:45 p.m.,

1 Coco called Zhu and stated that she was "done." Zhu then made arrangements to meet
2 Coco outside of the hotel.

3 Calls 1110, 1114, 1119-20, 1124 (TT4); 611, 622 (TT3): On August 8, 2006, at
4 9:04 p.m., a customer named Ely requested that Jiang send a prostitute to the Carlton Inn
5 in Kirkland. Jiang assured Ely that "the girl provides full service." At 9:12 p.m., Jiang
6 told Zhu that "the next appointment" was in Kirkland, and provided him with driving
7 directions. At 9:37 p.m., Jiang advised Ely that "the girl" would be there in 30 minutes,
8 and that "the driver (Zhu) knows the directions." At 10:15 p.m., Zhu told Jiang that he
9 "arrived." At 10:36 p.m., Coco called Zhu and explained that Ely's "thing (penis) is so
10 big that he broke the condom, and the condom does not fit him." Coco asked Zhu to talk
11 to Ely about doing a "hand job" instead of sex. Coco then handed the phone to Ely. Zhu
12 explained to Ely that Coco could not "handle" him, and suggested that she would "give a
13 'blow job' instead." Ely complained that he paid \$200 for "the whole thing." Zhu
14 suggested that Ely pay only \$150 for oral sex, to which Ely agreed. Zhu then instructed
15 Coco to refund Ely \$50. At 10:39 p.m., Zhu called Jiang to advise her of the situation.

16 Calls 1127, 1129-30, 1133 (TT4); 627, 629, 631 (TT3): On August 8, 2006, at
17 11:18 p.m., a customer named "Ace" asked Jiang to send a prostitute to his house in
18 Sammamish. Jiang told Ace that "the girl provides full service" and she would be there
19 in 30-40 minutes. Jiang further stated that "the girl's driver, Michael (Zhu)" may call Ace
20 for directions. At 11:34 p.m., Jiang gave Zhu driving directions to Ace's house. At 12:05
21 a.m., Zhu called Ace to confirm the directions. Shortly thereafter, Zhu told Jiang that
22 "the girl entered" Ace's house. At 12:13 a.m., Coco called Zhu and stated that she
23 "cannot do it" because Ace wanted to have anal sex. Zhu agreed, and instructed Coco to
24 "say 'no' to the guy."

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X. THE CRIMINAL ACTIVITIES OF THONGYOT LIAMURAI.

As described above, Liamurai worked as a call-girl prostitute for Zhu and Jiang from June 16-29, 2006, and again between July 27, 2006, and August 3, 2006. The intercepted calls concerning Liamurai's work for Zhu's and Jiang's escort service are summarized above. In addition, Liamurai and Kang engaged in the following intercepted conversations over TT1 and TT2:

Call 1148: On July 10, 2006, Liamurai and Kang had a three-hour telephone conversation. The portion of the conversation concerning Zhu is summarized above. During the remainder of the conversation, Liamurai and Kang discussed the following topics: At the outset of the conversation, Kang detailed the recent events at his brothel. Kang explained that he had approximately 35-40 customers at the brothel that day, and he had to turn away 6-7 additional customers because of the "long wait." Kang stated that he currently had two prostitutes working at the brothel, but a third was coming soon. Specifically, Kang informed Liamurai that one prostitute was leaving and two prostitutes were arriving on July 11th; and that one prostitute was leaving and another was arriving on July 12th. Kang said that the departing prostitutes were Korean and Chinese, and that the arriving prostitutes were Chinese, Korean, and Thai.

Liamurai expressed interest in the identity of the arriving Thai prostitute. She went on to detail her former role as a broker and/or smuggler of Thai prostitutes. Specifically, she told Kang that she was involved in bringing "many Thai girls" to the United States, and that she "used to have a lot of passports and everybody" knew her. Liamurai said that in one day she "sent four or five girls out," and sometimes sent "girls" two or three times per week, referring to prostitutes who entered the United States. She claimed that she "had a lot of passports" and she "never disappointed" people. Liamurai further stated that "the other boss had much less." However, Liamurai lamented the fact that she "lost a lot of money" because the "girls lied to her," claiming not to know anyone in the United States, but when they arrived many of them "ran away" without paying their debts. Liamurai stated that "the boss here . . . charges \$50,000," and that the charge was

1 "not [her] business" because the prostitutes "know the conditions" before they came to
2 the United States. Based on my training and experience, I believe that Liamurai was
3 referring to a smuggling debt of \$50,000, which is commonly assessed to prostitutes who
4 are smuggled or surreptitiously brought into the United States by passport fraud, visa
5 fraud, or otherwise. I believe Liamurai's statement that she "lost a lot of money"
6 indicates that she was directly involved in the smuggling activities and/or as broke of the
7 Thai prostitutes when they were in the United States.

8 With respect to the Thai prostitute Kang mentioned, Liamurai explained that she
9 wanted to see "the new girl's picture," because she wondered whether the prostitute was
10 "Emily," one of the Thai prostitutes who previously "ran away" from Liamurai and
11 "cheated on paying the passport money." Liamurai stated that Emily "ran away" with two
12 of her passports, and that she learned about this from "a mafia group in New York."
13 Liamurai also stated that "fourteen [other] people ran away," referring to additional
14 prostitutes who failed to pay their debts. She further stated that she told an associate of
15 hers to "keep all the documents, including the passports." Based on my training and
16 experience, I believe that Liamurai's statement about keeping the passports refers to the
17 common practice of brokers and smugglers maintaining possession of prostitutes'
18 passports until they satisfy their smuggling debt.

19 Kang and Liamurai also discussed various brothels which were operating
20 throughout the United States, including brothels in Chicago, Portland, Seattle, New York,
21 Las Vegas, and a brothel in an unspecified location which was operated by "Lulu."
22 Liamurai stated that she "sent out a lot of girls to Lulu," referring to her role as a broker
23 of prostitutes, supplying them to Lulu's brothel. Liamurai further discussed her work as a
24 prostitute at various brothels and/or escort services. She claimed that she made \$5,800
25 for nine days of work in Chicago, and \$16,000 in one day in Las Vegas.

26 Calls 1310, 1314: On July 14 and 15, 2006, Kang and Liamurai further discussed
27 the new Thai prostitute at Kang's brothel. Liamurai asked whether the "new flower"
28 (Kang's new prostitute) was Emily. Kang stated that he did not know for sure. Kang

1 later told Liamurai that he asked the Thai prostitute, but she says she is "from another
2 group," referring to a different smuggling organization than the one with which Liamurai
3 was previously associated. Liamurai was suspicious, and stated that the prostitute may be
4 lying. Liamurai asked how long the "girl" had been in the United States, and Kang stated
5 she had been here since 2004. Liamurai concluded that the prostitute was not Emily,
6 because Liamurai "stopped doing that" three years ago, referring to her participation in
7 smuggling and brokering prostitutes. Kang agreed, and stated that he did not believe the
8 Thai prostitute was Liamurai's "girl."

9 **Calls 1338, 1348, 1371:** On July 16 and 17, 2006, Kang and Liamurai spoke about
10 Kang's search to hire a brothel manager to replace Xie. Kang told Liamurai that Xie's
11 "last day" was July 15th, and that Kang was still "looking for someone." Liamurai stated
12 that "if he has nobody" she was "willing to help," meaning that she would manage
13 Kang's brothel until he could hire someone. Kang stated that currently he was managing
14 the brothel himself, including cleaning the brothel and cooking for the prostitutes. On
15 July 17th, Kang told Liamurai that he found someone to manage the brothel. Kang
16 explained that he would train the new manager himself, and teach him how to cook.
17 Liamurai advised Kang to "control the new guy from the beginning," and not to trust him
18 with money. Otherwise, Liamurai opined that he would become "lazy" like "Tom" and
19 Xie, referring to Kang's last two brothel managers. Liamurai again emphasized not to
20 trust the new employee with the money. Kang agreed, and stated that he would tell the
21 manager to put all of the money in an envelope and give it to Kang each morning. They
22 further discussed "Tom," and how he cheated Kang of some of the prostitution proceeds.
23 Liamurai repeated that she was willing to "help" Kang if he needed it, referring to
24 temporarily managing Kang's brothel. Liamurai then told Kang that an associate asked
25 her why she did not open her own "house" (brothel). She explained that she did not want
26 to be involved 100% in this business, and that she liked the flexibility of "just working"
27 and "not getting stuck in a house." She further stated that if she had her own brothel, she
28 would have to pay "a lot of agents for the girls coming from Thailand."

1 **Calls 4066-67, 4115 (TT2):** On July 17 and 18, 2006, Kang and Liamurai
2 discussed Kang's search to hire a new brothel manager. First, they discussed the price of
3 airfare for the new manager, who would need to travel from Los Angeles to Seattle.
4 Liamurai explained that she wanted to help Kang find a good price, and that the best price
5 she found was \$200.00 on Southwest Airlines. Later, Kang told Liamurai that "the guy"
6 was booking the ticket "right now," and the price was approximately \$240.00 on
7 American West Airlines. Kang later told Liamurai that "the guy changed his mind" and
8 was not going to come work in Seattle. Liamurai suggested that Kang call "Amy from
9 New York" because she may have "someone from Chinatown" who could work in
10 Kang's brothel. Kang stated that he had already found some else to manage the brothel.

11 **Call 4166 (TT2):** On July 19, 2006, Kang spoke to Liamurai about his continuing
12 search to hire a new brothel manager. Kang told Liamurai that "Wang" did not show up
13 because he was "afraid to come." Liamurai asked whether Kang told Wang "about the
14 house," referring to the fact that it was an illegal brothel, and not a legitimate massage
15 parlor. Kang replied, "I didn't tell much." Liamurai stated that she called Amy in New
16 York, and that Amy would try to find someone for Kang, however she could not promise
17 anyone because there were so many jobs in New York's Chinatown. According to
18 Liamurai, Amy asked whether the manager would work at "Michael's house," (Zhu's
19 business), but Liamurai stated that it was for "another house" (Kang's brothel). Kang told
20 Liamurai that he would have two "new girls" (prostitutes) arriving on July 21, 2006, and
21 one more on July 22, 2006. Liamurai again offered to come to Seattle to help Kang run
22 the brothel. She stated that she would check on airfares and let Kang know.

23 **Calls 4171, 4175, 4207, 4242, 4246, 4248 (TT2):** On July 19, 2006, Kang and
24 Liamurai made arrangements for her to travel from Los Angeles to Seattle for the purpose
25 of working as the manager of Kang's brothel until he found a permanent manager.
26 Liamurai booked the plane tickets, and advised Kang that she would arrive at
27 approximately 10:00 p.m. on July 19, 2006. Kang told Liamurai that he would arrange
28 for Ning to pick her up at the airport and bring her to the brothel. As described above, on

1 July 19, 2006, Ning transported Liamurai from Sea-Tac Airport to Kang's brothel.

2 **Calls 1461 (TT1); 4392 (TT2):** On July 20, 2006, Kang told Zhu that Liamurai
3 had arrived in Seattle to "help," referring to Liamurai working as Kang's brothel manager
4 until he found a permanent manager. Kang further stated that the new manager (Qu)
5 would arrive on July 22, 2006. Later that night, on July 20, 2006, CI#4 visited Kang's
6 brothel for the purpose of confirming that Liamurai was working as the brothel manager.
7 CI#4 called Kang at TT2 to arrange to visit the brothel. When he arrived at the brothel,
8 CI#4 was greeted by both Kang and Liamurai. (CI#4 subsequently identified Liamurai by
9 reviewing her driver's license photograph.) Liamurai offered CI#4 some water to drink
10 while he waited, and then she pointed out the two prostitutes to CI#4, for him to choose
11 from. As CI#4 departed the brothel, Liamurai thanked him for his business and stated,
12 "See you next time." Based on my training and experience, these actions are consistent
13 with Liamurai working as the brothel manager. The following day, on July 21, 2006,
14 Liamurai called Kang and asked him to buy more lemon, tomato, and ketchup. This call
15 also is consistent with Liamurai working as the brothel manager, because part of the
16 manager's job function is to cook food for the prostitutes.

17 **Calls 1776-77:** As detailed above, on August 1, 2006, at approximately 1:30 p.m.,
18 Kang picked-up an arriving prostitute named Mijin Mun (a/k/a "Nicki") at Sea-Tac
19 Airport. At 1:57 p.m., Kang told Liamurai that he "picked it up already," referring to
20 Mun. Kang directed Liamurai to "heat up some food" for Mun, and to make sure that the
21 "room (at the brothel) is clean." Liamurai stated that she would do so.

22 **XI. EVIDENCE OF MONEY LAUNDERING.**

23 **A. Evidence of Overseas Wire Transfers.**

24 Based on my training and experience, and in particular on many interviews I
25 conducted of prostitutes and brothel operators during Operation Syclops, I know that
26 many Asian women are recruited as prostitutes in their home countries by "agents."
27 These agents arrange for the women to be transported to the United States, either by
28 paying alien smugglers, or by obtaining visas and airline tickets for the women. The

1 agents then arrange for the women to rotate from brothel to brothel in various U.S. cities.
 2 The agents often receive a portion of the prostitution proceeds, as their share of the profits
 3 and as repayment of the prostitute's "debt" owed to the agent for the smuggling, visa,
 4 and/or transportation costs. It is often the responsibility of the brothel operators to collect
 5 the agent's share of the proceeds from the prostitutes, and to send the money periodically
 6 to the agents, in small amounts, via international wire transfer.

7 Between December 2, 2002, and April 11, 2006, Kang, Jiang, Zhu, and their
 8 associates collectively sent approximately \$160,000 via international wire transfers to
 9 various individuals living in China, according to records obtained from Western Union
 10 and other financial institutions. These payments, each of which are listed in the table
 11 below, are consistent with payments of prostitution proceeds to agents or other
 12 coconspirators in China. Records obtained from Western Union and other financial
 13 institutions establish that all of the below-listed funds were cash deposits, with the
 14 exception of the \$20,000 transfer on March 5, 2004, for which documentation is not
 15 available.

Date of Transfer	Sender	Recipient	Amount	Location
12/2/02	Kesheng Zhu	Hong Zhu	\$2,000.00	China
1/8/03	Rujing Jiang	Bao Qin Yu	\$500.00	Yantai, China
3/12/03	Kesheng Zhu	Runbo Zhu	\$999.99	Seihai, China
4/4/03	Kesheng Zhu	Defu Zhu	\$500.00	Shenyang, China
4/9/03	Kesheng Zhu	Zuo Li	\$999.99	Shenyang, China
4/11/03	Rujing Jiang	Kewun Zhu	\$300.00	Beijing, China
4/15/03	Kesheng Zhu	Jinsong Gao	\$500.00	Shenyang, China
5/16/03	Rujing Jiang	Jinsong Gao	\$500.00	Shenyang, China
6/17/03	Rujing Jiang	Yu He Meng	\$500.00	Beijing, China
7/17/03	Rujing Jiang	Jinsong Gao	\$500.00	Shenyang, China
7/17/03	Kesheng Zhu	Jinsong Gao	\$500.00	Shenyang, China
12/8/03	Rujing Jiang	Li Zhen Sun	\$1,000.00	Yantai, China
1/2/04	Kesheng Zhu	Bao Qin Yu	\$1,000.00	Yantai, China
1/15/04	Kesheng Zhu	Jinsong Gao	\$1,000.00	Shenyang, China

1	2/10/04	Kesheng Zhu	Jing Xia Sun	\$2,000.00	Xiamen, China
2	2/10/04	Rujing Jiang	Kemin Zhu	\$1,000.00	Weihai, China
3	3/5/04	Kang Yong Jun & Shu Chuan Chiang	Li Lian Shu	\$20,000.00	Not available
4	3/28/04	Yong Jun Kang	Defu Zhu	\$1,000.00	Fushun, China
5	4/8/04	Yong Jun Kang	Yong Dong Kang	\$2,000.00	Changchun, China
6	6/11/04	Rujing Jiang	Shu Zhen Zhao	\$1,000.00	Fushun, China
7	8/3/04	Yong Jun Kang	Bin Xu	\$500.00	Fushun, China
8	10/27/04	Yong J Kang	Li Lian Shu	\$5,000.00	Not available
9	11/8/04	Yong J Kang	Li Lian Shu	\$5,000.00	Not available
10	11/26/04	Yong Jun Kang	Lianshu Li	\$2,500.00	Fushun, China
11	11/27/04	Yong Jun Kang	Lianshu Li	\$2,500.00	Fushun, China
12	12/15/04	Yong Jun Kang	Lianshu Li	\$2,500.00	Fushun, China
12	12/20/04	Yong Jun Kang	Lianshu Li	\$2,500.00	Fushun, China
13	1/3/05	Yong Jun Kang	Bin Xu	\$2,500.00	Fushun, China
14	1/4/05	Yong Jun Kang	Bin Xu	\$2,500.00	Fushun, China
15	1/12/05	Rujing Jiang	Lizhen Shan	\$1,000.00	Yantai, China
16	1/12/05	Rujing Jiang	Bao Qin Yu	\$1,000.00	Yantai, China
17	2/16/05	Yong Jun Kang	Bin Xu	\$2,500.00	Fushun, China
18	3/5/05	Yong Jun Kang	Bin Xu	\$500.00	Fushun, China
19	3/10/05	Yong Jun Kang	Bin Xu	\$2,500.00	Fushun, China
20	4/21/05	Yong Jun Kang	Lianshu Li	\$2,500.00	Fushun, China
21	6/18/05	Yong Jun Kang	Shu Chuan Liang	\$1,000.00	Taipei, Taiwan
22	6/24/05	Yong Jun Kang	Lianshu Li	\$2,500.00	Fushun, China
22	6/25/05	Yong Jun Kang	Lianshu Li	\$2,500.00	Fushun, China
23	7/3/05	Yong Jun Kang	Lianshu Li	\$2,500.00	Fushun, China
24	7/9/05	Jun Ma ¹⁶	Bin Xu	\$2,500.00	Fushun, China

¹⁶ According to Western Union records, Jun Ma provided Kang's address as her place of residence. Ma sent the \$2,500.00 from the Viet Wah market, the location where Kang meets his brothel customers. Western Union filed a Suspicious Activity Report (SAR) with respect to the series of wire transfers to Bin Xu by people associated with Kang, between the dates of July 9, 2005, and August 1, 2005.

1	7/10/05	Kai Liu ¹⁷	Bin Xu	\$2,500.00	Fushun, China
2	7/12/05	Yong Jun Kang & Shu Chuan Chiang	Lian Shu Li	\$10,000.00	Fushun, China
3	7/25/05	Yong Jun Kang	Bin Xu	\$500.00	Fushun, China
4	7/26/05	Yong Jun Kang	Bin Xu	\$2,500.00	Fushun, China
5	7/30/05	James Minh Luong ¹⁸	Bin Xu	\$2,500.00	Fushun, China
6	7/31/05	Yong Jun Kang	Bin Xu	\$2,500.00	Fushun, China
7	8/1/05	Yong Jun Kang	Bin Xu	\$2,500.00	Fushun, China
8	8/10/05	Yong Jun Kang	Wan Xiang Hu	\$2,500.00	Fushun, China
9	8/31/05	Yong J Kang	Bin Xu	\$5,015.00	Shenyang, China
10	9/15/05	Kang Yong Jun & Shu Chuan Chiang	Lianshu Li	\$9,000.00	Not available
11	9/20/05	Yong Jun Kang	Lianshu Li	\$1,000.00	Fushun, China
12	10/21/05	Yong J Kang	Bin Xu	\$8,500.00	Fushun, China
13	10/23/05	Yong Jun Kang	Bin Xu	\$1,500.00	Fushun, China
14	11/10/05	Yong Jun Kang	Lianshu Li	\$1,500.00	Fushun, China
15	12/11/05	Rujing Jiang	Lianshu Li	\$2,750.00	Fushun, China
16	12/15/05	Yong Jun Kang	Lianshu Li	\$2,000.00	Fushun, China
17	1/18/06	Yong Jun Kang	Bin Xu	\$2,000.00	Fushun, China
18	2/19/06	Yong Jun Kang	Bin Xu	\$2,000.00	Fushun, China
19	3/15/06	Yong Jun Kang	Bin Xu	\$2,000.00	Fushun, China
20	4/4/06	Yong Jun Kang	Bin Xu	\$2,000.00	Fushun, China
21	4/11/06	Yong Jun Kang	Huei Lan Chang	\$1,000.00	Taipei, Taiwan

¹⁷ Liu also sent this money to Bin Xu from the Viet Wah market. This wire transfer was included as part of the Western Union SAR.

¹⁸ Bank records indicate that Kang wrote a check payable to James Luong three days prior to this wire transfer. Luong also has been connected to Kang and the other target subjects in other ways. For example, surveillance agents regularly observed a 1992 Honda Civic (Oregon license plate 100-BVM) parked in front of the Raymond Street brothel. This vehicle is registered to James M. Luong. Zhaozhu Tian drove this vehicle while he worked as the manager of the Raymond Street brothel. In May 2006, this same vehicle was observed parked outside of Zhu's and Jiang's former residence at 6401 24th Avenue South, Seattle, Washington. In June 2006, the same vehicle was parked in front of Zhenhua Liu's brothel.

1	5/29/06	Yong Jun Kang	Bin Xu	\$2,000.000	Fushun, China
2	6/5/06	Yong Jun Kang	Bin Xu	\$2,000.000	Fushun, China
3	6/25/06	Yong Jun Kang	Lianshu Li	\$2,000.000	Fushun, China
4		TOTAL		\$159,463.98	

5 All but seven of the above-listed wire transfers were made via Western Union. It
6 is significant that each Western Union transfer was in an amount of less than \$3,000,
7 because Western Union requires persons seeking to wire transfer funds in excess of
8 \$3,000 to present proof of date of birth, social security number, and occupation. By
9 keeping their transfers smaller than \$3,000, the defendants were able to avoid providing
10 this information to Western Union. Based on my training and experience, I believe that
11 this illustrates an attempt by the defendants to conceal their activities to some extent. In
12 addition, there are instances when the defendants made consecutive wire transfers from
13 different Western Union locations in the Seattle area, rather than returning to the same
14 branch. Based on my training and experience, I believe that these transactions were
15 structured in this manner in an attempt to avoid raising suspicion at Western Union, and
16 to avoid triggering the \$3,000 reporting requirement. This also illustrates an intent to
17 conceal the financial transactions and the subjects' connections thereto. Similarly, with
18 only one exception, the wire transfers made from banks were each in amounts of less than
19 \$10,000, which would not trigger the filing of Currency Transaction Reports (CTRs) by
20 the banks.

21 **B. Wiretap Calls Concerning Money Laundering.**

22 Wiretapped phone calls confirm that Kang and other defendants conducted
23 financial transactions with the proceeds of the prostitution activities. For example, Kang
24 and Zhu deposited cash into bank accounts for the prostitutes, and Kang wire-transferred
25 money to family members and other persons in China. Some of the intercepted
26 conversations concerning the disposition of prostitution proceeds are set forth below.
27 Unless otherwise noted, the calls were intercepted over TTI.

1 **Call 112:** On June 2, 2006, Kang had a detailed conversation with an Asian female
2 named "Wang" about his prostitution business. Among other things, Kang stated: that he
3 was making better money than he would by working a "job"; that he paid a "protection
4 fee" to unidentified persons;¹⁹ that the brothel business was "kind of shaky" when he first
5 "took over" from "Mr. Zhu" (Kesheng Zhu), but now the business was "much more
6 stable"; that he usually employed three "girls" (prostitutes) at the brothel; and that he
7 moved the brothel location approximately every seven or eight months. Kang also stated
8 that he recently sent (by wire transfer) \$10,000 to his younger brother in China.

9 **Calls 189, 204, 306:** On June 5, 2006, Kang spoke to an unknown Asian male
10 about sending funds overseas via Western Union. The Asian male provided Kang with an
11 international account number. Kang asked whether it was Western Union, and the male
12 confirmed that it was. Kang assured the caller that the money would be in the Bank of
13 China in a few days. The Asian male stated that "it was 14, but now it's 15," referring to
14 the sum of money to be wire transferred. The following day, June 6, 2006, Kang told the
15 Asian male that "the matter had been taken care of." On June 8, 2006, the Asian male
16 confirmed for Kang that a total of "8,000 came."

17 **Call 646:** On June 19, 2006, a prostitute working at Kang's brothel called Kang
18 and asked whether he was "coming over" (to the brothel). She explained that she wanted
19 to "deposit money in the bank." Kang told her he would be at the brothel later, implying
20 that he would take the prostitute to the bank at that time.

21 **Call 673:** On June 20, 2006, Kang told Zhu that he was "making a deposit" for one
22 of his "girls," referring to depositing cash in one of the prostitute's bank accounts.

23 **Call 772, 775:** On June 23, 2006, Kang spoke with a Thai prostitute named
24 "Winnie," who was working at his brothel. Based on the calls, it was apparent that Kang
25 was attempting to wire transfer money on behalf of Winnie, but was having trouble with
26 the account number. Kang asked Winnie to reconfirm the account number, because the
27

28 ¹⁹ Based on my training and experience, I know that it is common for Asian businesses, and
in particular illegal enterprises, to pay extortion money to gang members or other criminals.
This money is commonly referred to as "protection money" or a "protection fee."

1 bank informed him that the account had been closed. Winnie later called Kang to confirm
2 that he received the correct account number by text-message.

3 **Call 738:** On June 21, 2006, Zhu told Kang that he visited two Safeway stores that
4 day. When asked why, Zhu explained that he was "doing business for the girls" (wiring
5 money on the behalf of prostitutes) and that the Safeway stores had different banks inside.

6 **Call 911:** On June 27, 2006, Kang spoke with a Vietnamese prostitute named
7 "Jackie," who was working at his brothel. Kang stated that he was attempting to wire
8 transfer money on behalf of Jackie, but was having trouble with the bank account number.

9 **Call 1156, 1190:** On July 10 and 11, 2006, Kang arranged to wire transfer, via
10 Western Union, a total of \$3,000 to his mother and brother in China. Subsequent
11 intercepted conversations indicated that Kang's family received the money.

12 **Calls 1195-96:** On July 12, 2006, Kang told a prostitute named "Kelly," who was
13 working at his brothel at the time, that he was at the bank "making a deposit" for her.

14 **Call 1318:** On July 15, 2006, Kang talked to an unidentified prostitute who was
15 currently living in Taiwan. She recounted the work she did as a prostitute in the United
16 States, traveling from brothel to brothel in Texas and other states. She and Kang also
17 discussed methods of structuring cash deposits, including the need to deposit sums of less
18 than \$5,000 to "avoid investigation."

19 **Calls 1544, 1565, 1603:** On July 23, 2006, Kang told a female in China that he
20 wire transferred \$8,005 to her at the Farmer's Bank. Over the next two days, she
21 confirmed with Kang that she received the money. She asked Kang whether the bank
22 would assess a service charge because Kang sent the money from a different bank. Kang
23 explained that he could not use the same bank because "people will recognize me." Kang
24 further stated that he would send her an additional \$2,000 on July 26, 2006.

25 **C. Payments for Ruijing Jiang's Lexus LX470.**

26 Jiang is the registered owner of a 2002 Lexus LX470, VIN # JTJHT00W323514843.
27 Records obtained from Lexus establish that Jiang purchased the vehicle in April 2003.
28 Jiang financed the purchase through a loan from Lexus in the amount of \$43,281.90.

1 Since April 2003, Jiang has made payments to Lexus which have reduced the current
2 principle balance of the loan to \$17,251.91. For example, Jiang makes monthly payments
3 of \$887.92 on the vehicle. However, neither Jiang nor Zhu are legitimately employed,
4 and they have no known legitimate sources of income. Thus, I believe that the funds used
5 to make payments on the Lexus are the proceeds of Jiang's and Zhu's criminal activities.

6 **XII. EVIDENCE OF THE HARBORING OF ILLEGAL ALIENS.**

7 **A. Employment of Aliens Who Were Smuggled Into the U.S.**

8 As described above, during recorded conversations with CI#1, Kang stated that
9 some of the prostitutes he employed were smuggled into the United States, and that he
10 had connections with alien smugglers. Kang's claims in this regard are corroborated by
11 an examination of immigration records, which indicate that some of the prostitutes with
12 connections to Kang appear to have been smuggled into the United States, including the
13 following two prostitutes:

14 **Keonok Lee:** Based on telephone and airline records, Lee appears to have worked
15 as a prostitute at Kang's brothel between February 11, 2006, and February 21, 2006, and
16 Lee's telephone contacted TTI on 27 occasions in 2006. Republic of Korea immigration
17 records indicate that Lee was issued passport number YP1636584. There are no ICE
18 records indicating that Lee was ever legally admitted into the United States under her
19 passport number. Immigration records do indicate, however, that Lee arrived at
20 Vancouver, British Columbia on October 21, 2004. Based on my training and experience,
21 and in particular on the training and experience of ICE agents participating in this
22 investigation, I am aware that Korean aliens are often smuggled into the United States
23 from Canada. There have been numerous alien smuggling investigations and
24 prosecutions in the Western District of Washington which have disrupted the smuggling
25 of Korean aliens along the U.S./Canadian border. Based on this well-established
26 smuggling pattern, on the fact that Lee traveled from Korea to Vancouver, B.C., and the
27 fact that Lee has never been legally admitted into the United States at a designated port of
28 entry, I believe that Lee was smuggled into the United States.

1 A. Youn Kim: A United States phone subscribed to by A. Youn Kim contacted
2 TT1 23 times between February 10, 2006, and February 21, 2006. Kim is a Korean
3 national, who was assigned passport number KN0597978. There is no record that Kim
4 was admitted into the United States legally at any designated port of entry. The absence
5 of this record strongly suggests that Kim was smuggled into the United States.

6 In addition, during wiretapped calls Kang discussed the fact that some of the
7 prostitutes he employed, or attempted to employ, had been smuggled into the United
8 States. For example, on June 3, 2006, Kang advised an unidentified prostitute how she
9 could attempt to fraudulently obtain immigration status. The prostitute explained to Kang
10 that she had been smuggled into the United States in 2000 using a passport that did not
11 belong to her. Kang told her to hire a lawyer and apply for a green card "in the same fake
12 name." (TT1, calls 132-33)

13 On August 8, 2006, a prostitute who was scheduled to work at Kang's brothel
14 beginning August 22, 2006, called Kang to cancel the schedule. She stated that another
15 prostitute named "Linda," who lived in Vancouver, British Columbia, Canada, would
16 "replace" her. Kang stated that it would be "very difficult (for Linda) to cross the U.S.-
17 Canadian border." The prostitute assured Kang that Linda has "been to (a brothel in)
18 Atlanta and to the U.S. many times, using someone else's identification." Kang asked the
19 prostitute to have Linda call him. (TT1, call 2012)

20 **B. Employment of Aliens Who Illegally Overstayed Visas.**

21 In several intercepted conversations (summarized above), Zhu and Kang discussed
22 the fact that prostitutes they employed had been arrested for being illegal aliens who
23 overstayed their visas. Immigration records confirm that many of the prostitutes Kang
24 and Zhu have employed, or have arranged travel for, are illegal aliens who initially
25 entered the United States by obtaining visas, and then overstayed the visa period. For
26 example, the following prostitutes with connections to Kang and/or Zhu are illegal aliens
27 due to overstaying their visas:
28

1 Danweol Choi: ICE records establish that Choi is a Korean national, and that on
2 January 14, 2005, she entered the United States at Los Angeles on a temporary visitor
3 visa. The visa expired on July 13, 2005. Thereafter, Kang's email account was used to
4 purchase an airline ticket for Choi to travel on July 22, 2005, from Seattle to Los Angeles.

5 On September 13, 2005, Choi's passport was seized in Los Angeles during the execution
6 of a search warrant at the residence of a target of an ICE alien smuggling investigation.
7 Passports belonging to twenty additional Korean women also were seized at the same
8 time. Based on my training and experience, I am aware that agents, brokers, and alien
9 smugglers often maintain possession of the passports belonging to prostitutes who owe
10 them a debt, in order to prevent them from absconding prior to satisfying the debt. Thus,
11 it appears that Choi and the other twenty Korean females whose passports were seized
12 from the alien smuggling target were attempting to work off a debt through prostitution.

13 Geokkhim Gan: Gan entered the United States on a temporary visa, which
14 terminated on November 30, 2003. Thereafter, Gan illegally overstayed the visa.
15 Subsequently, Kang's email account was used to purchase airline tickets for Gan to fly
16 from New York to Portland on December 31, 2004, and a return ticket for travel on
17 January 10, 2005. In a separate alien smuggling investigation, ICE agents identified Gan
18 as one of approximately 150 Malaysian women who have used related addresses on U.S.
19 visa applications, suggesting that these women are connected to a larger alien
20 smuggling/harboring operation. Many of these women (but not Gan) have been arrested
21 for prostitution offenses in the past.

22 Saifon Saensuk: In 1999, Saensuk was arrested as part of an FBI and ICE
23 prostitution ring investigation in Atlanta, Georgia. At the time of her arrest, she was an
24 illegal alien. Kang's email account was subsequently used to purchase airline tickets for
25 Saensuk to fly from Los Angeles to Seattle on June 11, 2005, and a return ticket for travel
26 from Seattle to Las Vegas on June 21, 2005. Saensuk currently is not authorized to be in
27 the United States.
28

1 Mi Sung Jung: Kang arranged to purchase airline tickets for Jung to travel from
2 Seattle to Los Angeles on July 11, 2005. Kang's email account was subsequently used to
3 arrange airline travel for "Mi Jung" between Seattle and San Francisco on March 15,
4 2006. On August 24, 2005, Jung was arrested in Honolulu, Hawaii on prostitution
5 charges stemming from an ICE undercover operation. At the time, she was an illegal
6 alien, and she was deported from the United States on October 12, 2005.

7 Jutakarn Manurangsarn: As set forth above, on January 21, 2006, surveillance
8 officers observed Kang drop off Manurangsarn at Sea-Tac airport. She was contacted by
9 SPD officers, and admitted to having overstayed a temporary visa. ICE records confirm
10 that Manurangsarn entered the United States on May 20, 2003, and that her temporary visa
11 expired on November 19, 2003.

12 Phatcharin Potha: Potha entered the United States from Thailand on September 16,
13 2004. Her temporary visa expired on October 15, 2004. Kang uses TT1 to maintain
14 regular telephonic contact with Potha. For example, on May 31, 2006, Kang arranged for
15 Potha to work at his brothel between October 2, 2006, and October 12, 2006.

16 Thiwarat Ratchapont (a/k/a "Tiffany"): As set forth above, Ratchapont arrived in
17 Seattle on June 10, 2006, and thereafter worked as a prostitute at Kang's brothel.
18 According to ICE records, Ratchapont is a Thai national, who entered the United States
19 on a temporary visa which had expired prior to June 2006. Thus, at the time Ratchapont
20 worked at Kang's brothel, she was an illegal alien.

21 Chalanthon Malaku (a/k/a "Vicki"): As described above, Malakul was arrested on
22 July 21, 2006, as she arrived in Seattle for the purpose of working at Kang's brothel.
23 According to ICE records, Malakul is a Thai national, who entered the United States on a
24 temporary visa which had expired prior to July 2006. Thus, at the time Malakul arrived to
25 work at Kang's brothel, she was an illegal alien.

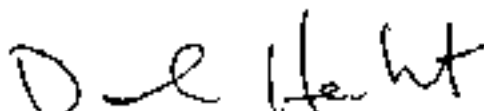
26 Sranva Panteng (a/k/a "Jesse"): As set forth above, Panteng was arrested on June
27 12, 2006, while working as a call-girl for Zhu and Jiang. Panteng is a citizen of
28 Singapore who had illegally overstayed her visa. Thus, at the time Panteng worked as a

1 prostitute for Zhu and Jiang, she was an illegal alien.

2 Mijin Mun (a/k/a "Acna Moon," "Nicki"): As set forth above, Mun arrived in
3 Seattle on August 1, 2006, and thereafter worked as a prostitute at Kang's brothel. Mun
4 is a Korean national and an illegal alien, who overstayed her temporary visa.

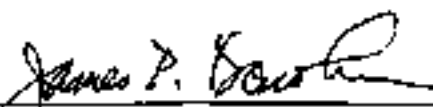
5 **XIII. CONCLUSION**

6 Based on the foregoing, there exists probable cause to believe that the defendants
7 committed the above-listed offenses.

8 

9 _____
10 DAVID HECHT
Special Agent, Federal Bureau of Investigation

11
12 SUBSCRIBED AND SWORN to before me this 9th day of
13 August, 2006, by DAVID HECHT.

14
15 

16 _____
17 JAMES P. DONOHUE
United States Magistrate Judge