

UNITED STATES DISTRICT COURT FILED 15 NOV 18 16:33 USDC ORP

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA

3:18-cr- 559 mo

v.

INDICTMENT

ZONGTAO CHEN,  
a.k.a. Mark Chen,  
WEIXUAN ZHOU,  
YAN WANG,  
a.k.a. Sarah,  
TING FU,  
CHAODAN WANG,

18 U.S.C. §§ 2, 371, and 1952(a)(3)

Forfeiture Allegation

UNDER SEAL

**UNDER SEAL**

Defendants.

**THE GRAND JURY CHARGES:**

**COUNT 1**

**(Conspiracy to use Interstate Facilities to Promote, Manage, Establish, Carry on, or Facilitate a Racketeering Enterprise)  
(18 U.S.C. §§ 371 and 1952(a)(3))**

On or about and between, August 21, 2015, the exact date being unknown to the grand jury, and continuing until on or about November 15, 2018, in the District of Oregon and elsewhere, defendants **ZONGTAO CHEN, a.k.a. Mark Chen, WEIXUAN ZHOU, YAN WANG, a.k.a. Sarah, TING FU, and CHAODAN WANG**, did knowingly and willfully combine, conspire, confederate, and agree with each other and with others both known and unknown to the Grand Jury, to commit an offense against the United States, and one or more did

**Indictment**

an act to effect the object of the conspiracy, that is, knowingly using a facility in interstate and foreign commerce, specifically computers and cellular telephones, with intent to promote, manage, establish, and carry on acts to facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely, a business enterprise involving prostitution offenses in violation of the laws of the State in which they are committed and of the United States and thereafter performed and attempted to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of such unlawful activity.

**Purpose of the Conspiracy**

Defendants **ZONGTAO CHEN, a.k.a. Mark Chen, WEIXUAN ZHOU, YAN WANG, a.k.a. Sarah, TING FU, and CHAODAN WANG**, and others known and unknown to the grand jury, were members of a criminal organization and business enterprise whose purpose was to make money by promoting, managing, establishing, carrying on, and facilitating illegal prostitution activities across the United States, Canada, and Australia.

**Manner and Means of the Conspiracy**

It was part of this conspiracy that:

1. To achieve the purpose of the conspiracy, the organization registered, set up, and used numerous websites and online advertisements to promote, manage, establish, and carry out acts of illegal prostitution within the District of Oregon and elsewhere. These advertisements typically featured scantily clad Asian women, under the guise of being “escorts,” which were, in fact, advertisements for illegal prostitution.

2. The main website used by the organization to post on-line prostitution related advertisements was "supermatchescort.com." The "supermatchescort.com" website displays multiple pictures of Asian women posing in a provocative manner, often wearing lingerie or bikinis. The "supermatchescort.com" website had a menu listing their "Supermatch Girls," the rates charged, a description of the site, a way to contact the site, employment, a press room, and the "girls in your city." The pictures of the women typically show the location where they are working, their contact information, their physical measurements, and a short description of the woman. Many of the advertisements also provide a description, using coded language, of the prostitution related services they offer. The "supermatchescort.com" website also links to an email address, supermatchescort@gmail.com, which allows individuals to directly contact the site and is used to help carry out the criminal activities of the organization. The "supermatchescort.com" website directly serviced the following areas: Albuquerque, NM; Anaheim, CA; Atlanta, GA; Augusta, GA; Austin, TX; Bakersfield, CA; Bismarck, ND; Brisbane, Australia; Calgary, Canada; Dallas, TX; Denver, CO; Des Moines, IA; Detroit, MI; Edmonton, Canada; Fairfax, VA; Fargo, ND; Fort Collins, CO; Fort Wayne, IN; Grand Junction, CO; Grand Rapids, MI; Green Bay, WI; Halifax, Canada; Houston, TX; Kansas City, MO; Los Angeles, CA; Madison, WI; Melbourne, Australia; Milwaukee, WI; Minneapolis, MN; Minot, ND; New York, NY; Newark, CA; Niagara Falls, Canada; Oakland, CA; Odessa, TX; Oklahoma City, OK; Palmdale, CA; Philadelphia, PA; Portland, OR; Provo, UT; Red Reed, Canada; Sacramento, CA; Salt Lake City, UT; San Diego, CA; Seattle, WA; Sioux Falls, SD; South Bend, IN; Spokane, WA; Springfield, MO; Sydney, Australia; Tacoma, WA; Toronto, Canada,

Tucson, AZ; Warwick, RI; Williston, ND; Windsor, Canada, Winnipeg, Canada; and Yakima, WA.

3. The organization also used the following websites, which are directly linked to the “supermatchescort.com” website, to post on-line advertisements for purposes of promoting prostitution in other locations. These websites also display multiple pictures of Asian women posing in a provocative manner, often wearing lingerie or bikinis. The websites also have a menu listing their “girls,” the rates charged, links to other websites in other cities, a way to contact the site. The pictures of the women typically show the location where they are working, their contact information, their physical measurements, and a short description of the woman. Many of the advertisements also provide a description, using coded language, of the prostitution related services they offer. The additional websites include:

<u>Website</u>	<u>Location Advertised</u>
www.asianescortsatlanta.com	Roswell, GA; Duluth, GA
www.dallasescortasian.com	Dallas, TX
www.denverescortasian.com	Westminster, CO; Aurora, CO
www.fargoasianescort.com	Fargo, ND
www.fortcollinsasianescort.com	Fort Collins, CO
www.kansasasianescort.com	Kansas City, MO
www.laasianescort.com	Los Angeles, CA
www.milwaukeeasianescort.com	Milwaukee, WI
www.minneapolisasianescort.com	Minneapolis, MN; Bloomington, MN

www.nyescortasian.com	New York City, NY
www.oaklandasianescort.com	Oakland, CA
www.portlandasianescort.com	Tigard, OR; Beaverton, OR
www.saltlakecityasianescort.com	Provo, UT
www.sandiegoasianescort.com	Oceanside, CA
www.seattleasianescorts.com	Renton/Bellevue, WA
www.siouxfallsasianescort.com	Sioux Falls, ND
www.tacomaasianescort.com	Tacoma, WA
www.tucsonasianescort.com	Tucson, AZ
www.providenceasianescort.com	Warwick, RI; Providence, RI
www.calgaryasianescort.com	Calgary, Canada
www.torontoescortsasian.com	Toronto, Canada (Don Mills/Sheppard)
www.edmontonasianescort.com	Edmonton, Canada
www.melbourneescortss.com	Melbourne, Australia
www.sydneyasianescorts.com	Sydney, Australia

4. Within the United States, to achieve the purpose of the conspiracy, the organization used computers and cellular telephones with the intent to promote, manage, establish, and carry on acts to facilitate the promotion, management, establishment, and carrying on of the illegal prostitution activities of the operation.

5. Within the various cities that the organization was operating a “boss” would oversee and manage a local brothel where the Asian females would engage in illegal acts of prostitution.

6. Customers seeking to engage in acts of illegal prostitution would either call the number listed in the advertisement or send a message by text, email, or WeChat, an encrypted Internet messenger service.

7. The organization employed “dispatchers,” who were individuals operating like a call center, who would receive incoming calls, texts, and emails from the potential customers who were responding to the various websites and seeking to set up “dates” (encounters designed for the purpose of engaging in illegal acts of prostitution). The “dispatchers” would then coordinate and schedule the “dates” between the customers and the women working at the various brothels.

8. The organization, in an effort to limit their criminal exposure, also used various individuals to lease apartments and residences that the organization used as brothels.

9. The organization also employed individuals who would pick up women from the airport and then transport them to and from various locations and who were also responsible for bringing supplies to the brothels, maintaining the brothels, and for cleaning up the brothels.

#### **Overt Acts of the Conspiracy**

In particular, the defendants, together with others known and unknown to the grand jury, committed one or more of the following acts in furtherance of the conspiracy.

1. Defendant **WEIXUAN ZHOU** registered, maintained, and paid for the following websites: [www.supermatchescort.com](http://www.supermatchescort.com); [www.asianescrotsatlanta.com](http://www.asianescrotsatlanta.com); [www.dallasescortasian.com](http://www.dallasescortasian.com); [www.denverescortasian.com](http://www.denverescortasian.com); [www.fargoasianescort.com](http://www.fargoasianescort.com); [www.fortcollinsasianescort.com](http://www.fortcollinsasianescort.com); [www.kansasasianescort.com](http://www.kansasasianescort.com); [www.laasianescort.com](http://www.laasianescort.com); [www.milwaukeeasianescort.com](http://www.milwaukeeasianescort.com); [www.minneapolisasianescort.com](http://www.minneapolisasianescort.com); [www.nyescortasian.com](http://www.nyescortasian.com);

www.oaklandasianescort.com; www.portlandasianescort.com; www.saltlakecityasianescort.com; www.sandiegoasianescort.com; www.seattleasianescorts.com; www.siouxfallsasianescort.com; www.tacomaasianescort.com; www.tucsonasianescort.com; www.providenceasianescort.com; www.calgaryasianescort.com; www.torontoescortsasian.com; www.edmontonasianescort.com; www.melbourneescortss.com; and, www.sydneyasianescorts.com.

2. Defendant **ZONGTAO CHEN, a.k.a. Mark Chen**, subscribed to the email address "Supermatchescort.gmail.com," which is the email address linked to the websites identified above and is used to facilitate the criminal activities of the conspiracy.

3. Defendant **ZONGTAO CHEN, a.k.a. Mark Chen**, used the encrypted Internet messenger service WeChat to advertise and recruit individuals to work for the organization. The individuals would respond to the advertisement directly to Defendant **ZONGTAO CHEN, a.k.a. Mark Chen**.

4. Defendant **ZONGTAO CHEN, a.k.a. Mark Chen**, would assign various women to a brothel location and instruct them where to go. Sometimes, defendant **ZONGTAO CHEN, a.k.a. Mark Chen**, will ask for a cash deposit from the woman if she had not previously worked for him.

5. Defendant **ZONGTAO CHEN, a.k.a. Mark Chen**, set up and utilized separate WeChat groups for each location (brothel) as a way to facilitate, manage, maintain, promote, establish, and carry on the illegal prostitution activities occurring at that location. These WeChat groups functioned as a group messenger service and individuals need to be selected into the group to join the group.

6. Defendant **ZONGTAO CHEN, a.k.a. Mark Chen**, used a sophisticated computer program to keep track of the dates for each provider and changes the phone numbers used frequently. Dispatchers answer the phones and use a computer program to schedule and track all of the prostitution dates. This computer program also has a customer database system in which the dispatcher can enter a customer's phone number and see what dates the customer has previously made and with which woman it was scheduled with.

7. Defendant **ZONGTAO CHEN, a.k.a. Mark Chen**, promoted and helped maintain illegal prostitution activities that occurred at brothels in Portland, OR, Tigard, OR, and Beaverton, OR, in violation of Oregon Revised Statute 167.007.

8. Defendant **ZONGTAO CHEN, a.k.a. Mark Chen**, received money generated from the prostitution related activities of the organization.

9. Defendant **YAN WANG, a.k.a. Sarah** worked for defendant **ZONGTAO CHEN, a.k.a. Mark Chen**, and operated as a dispatcher in which she received messages from would-be customers seeking to engage in illegal prostitution and then scheduled the prostitution related "dates" with women in various cities across the United States, including to cities within Oregon, in which prostitution is illegal pursuant to Oregon Revised Statute 167.007.

10. Defendant **TING FU** leased multiple residences in Oregon that are used as brothels for the organization and where acts of prostitution, in violation of Oregon Revised Statute 167.007, occurred.

11. Defendant **TING FU** managed multiple residences in Oregon that are used as brothels for the organization and where acts of prostitution, in violation of Oregon Revised Statute 167.007, occurred.



12. Defendant **TING FU** sent money from Oregon to defendant **ZONGTAO CHEN, a.k.a. Mark Chen.**

13. Defendant **CHAODAN WANG** leased a residence in Oregon that was used as a brothel for the organization and where acts of prostitution, in violation of Oregon Revised Statute 167.007, occurred.

14. Defendant **CHAODAN WANG** managed a residence in Oregon that was used as a brothel for the organization and where acts of prostitution, in violation of Oregon Revised Statute 167.007, occurred.

15. Defendant **CHAODAN WANG** rented a motel room in Oregon that was used as a brothel for the organization and where acts of prostitution, in violation of Oregon Revised Statute 167.007, occurred.

16. Defendant **CHAODAN WANG** managed the activities at a motel room in Oregon that was used as a brothel for the organization and where acts of prostitution, in violation of Oregon Revised Statute 167.007, occurred.

In violation of Title 18, United States Code, Sections 371 and 1952(a)(3).

**COUNT 2**  
**(Use of Interstate Facilities to Promote, Manage, Establish, Carry on,  
or Facilitate a Racketeering Enterprise)**  
**(18 U.S.C. §§ 2 and 1952(a)(3))**

On or about and between, August 21, 2015, the exact date being unknown to the grand jury, and continuing until on or about November 15, 2018, in the District of Oregon and elsewhere, defendants **ZONGTAO CHEN, a.k.a. Mark Chen, WEIXUAN ZHOU,**

**YAN WANG, a.k.a. Sarah, TING FU, and CHAODAN WANG**, did knowingly use a facility in interstate and foreign commerce, specifically computers and cellular telephones, with intent to promote, manage, establish, and carry on acts to facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely, a business enterprise involving prostitution offenses in violation of the laws of the State in which they are committed, to-wit prostitution in violation of Oregon Revised Statute 167.007, and of the United States and thereafter performed and attempted to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of such unlawful activity;

In violation of Title 18, United States Code, Sections 2 and 1952(a)(3).

**FORFEITURE ALLEGATION**

Upon conviction of one or more of the offenses alleged in Counts 1 or 2, defendants **ZONGTAO CHEN, a.k.a. Mark Chen, WEIXUAN ZHOU, YAN WANG, a.k.a. Sarah, TING FU, and CHAODAN WANG**, shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) any property constituting or derived from proceeds traceable to the violation, including but not limited to a sum of money representing the amount of proceeds obtained as a result of the offense in the form of a money judgment.

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.

Dated: November 15, 2018

A TRUE BILL

OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS  
United States Attorney

  
SCOTT M. KERIN, OSB # 965128  
Assistant United States Attorney