

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA :
: Hon. James B. Clark, III :
: Magistrate. No. 24-12240 :
: CRIMINAL COMPLAINT :

MIEYON CHOI,
ZHEJUN PIAO,
SHANGXIAN CUI, AND
MEIXIANG JIN

v.

I, Grissay Munoz, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Department of Homeland Security–Homeland Security Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

GRISSAY A
MUNOZ
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MUNOZ
Date: 2024.08.07 16:20:11
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Grissay Munoz, Special Agent
Homeland Security Investigations

Special Agent Grissay Munoz attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 7th day of August, 2024.

/s/ James B. Clark / GM

Hon. James B. Clark, III

United States Magistrate Judge

ATTACHMENT A

Count 1

(Conspiracy to Commit Interstate Travel or Transportation in Aid of a Racketeering Enterprise)

From at least as early as in or around May 2017 through the present, in the District of New Jersey and elsewhere, the defendants,

MIYEON CHOI,
ZHEJUN PIAO
SHANGXIAN CUI, and
MEIXIANG JIN,

did knowingly and intentionally conspire and agree with each other and others to commit offenses against the United States, that is, to travel in interstate commerce and use the mail and any facility in interstate commerce, with intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of, any unlawful activity, to wit, prostitution and promotion of prostitution, in violation of New Jersey Revised Statutes § 2C:34-1(b)(1), (2), and (8), contrary to Title 18, United States Code, 1952(a)(3).

In violation of Title 18, United States Code, Section 371.

ATTACHMENT B

I, Grissay Munoz, am a Special Agent of the Department of Homeland Security – Homeland Security Investigations (“HSI”). The information contained in the complaint is based upon my personal knowledge, as well as information obtained from other sources, including: (a) statements made or reported by various witnesses with knowledge of relevant facts; (b) my review of publicly available information; and (c) my review of evidence, including video surveillance, business records, bank records, and other documents. Because this complaint is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

Overview of the Conspiracy

1. Law enforcement has conducted an investigation into a series of illicit massage parlors sometimes referred to as spas, brothels, or Asian massage parlors in New Jersey and New York that have been offering sexual services in exchange for money (the “SPAS”). As detailed below, evidence obtained in this investigation demonstrates that the defendants, MIYEON CHOI, ZHEJUN PIAO, SHANGXIAN CUI, and MEIXIANG JIN, among others known and unknown (collectively, the “Conspirators”), have conspired to operate the SPAS knowing full well of the illicit activities occurring therein, and to use facilities in interstate commerce to do so (the “Conspiracy”). More particularly, the Conspirators variously, at times throughout the Conspiracy, have owned, managed, or derived money from the SPAS.

2. As further explained below, law enforcement has determined that the Conspirators have knowingly operated the SPAS to offer sexual services in exchange for money, based on, among other evidence, online websites associated with the SPAS, undercover operations, surveillance of the SPAS, financial records for the Conspirators, and email records.

Defendants and SPAS

3. At times relevant to this Complaint:

a. Defendant MIYEON CHOI (“CHOI”) was a resident of Palisades Park, New Jersey. Based on records obtained from banks, utility companies, and electronic service providers, law enforcement believes that CHOI uses a cell phone ending in 2169 (the “Choi Cell Phone Number”). Law enforcement also believes that CHOI operates numerous email accounts to conduct different aspects of the scheme.

b. Defendant ZHEJUN PIAO (“PIAO”) was a resident of Palisades Park, New Jersey. Based on records obtained from banks, utility companies, and electronic services providers, law enforcement believes that PIAO uses a cell phone ending in 1570 (the “Piao Cell Phone Number”).

c. Defendant SHANGXIAN CUI (“CUI”) was a resident of Palisades Park, New Jersey.

d. Defendant MEIXIANG JIN (“JIN”) was a resident of Palisades Park, New Jersey. Based on records obtained from banks and utility companies law enforcement believes that JIN uses a cell phone ending in 0165 (the “Jin Cell Phone Number”).

4. On or about August 16, 2023, JIN and CUI closed on the purchase of a house in Palisades Park with two residential units, “Unit A” and “Unit B.” Evidence obtained throughout this investigation, including surveillance, records obtained from utility companies, and financial records, has revealed that JIN and CUI live in Unit A and CHOI and PIAO live in Unit B. According to records obtained from an Internet Service Provider, JIN is the registered customer at Unit A, and CHOI is the registered customer at Unit B. Unit B has been assigned the same IP address since August 29, 2023, when CHOI created her account for that address with the Internet Service Provider (the “Unit B IP Address”).

5. As part of this investigation, law enforcement executed multiple search warrants on an email provider for various email accounts controlled by the Conspirators: the “Choi Email Account-1,” the “Choi Email Account-2,” the “Choi Email Account-3,” and the “Piao Email Account.”

- a. Subscriber information for the Choi Email Account-1 lists the Choi Cell Phone Number as the user phone number and the name 최미연, which translates to “Miyeon Choi.”
- b. Subscriber information for the Choi Email Account-2 lists the Choi Cell Phone Number as the user phone number and the name “miyeon.”
- c. Subscriber information for the Choi Email Account-3 shows that it has used CHOI’s Unit B IP Address.
- d. Subscriber information for the Piao Email Account lists the Piao Cell Phone Number as the user phone number.

6. The investigation has revealed that the Conspirators, in furtherance of the Conspiracy, have operated multiple spas under various names during the Conspiracy at multiple premises, including:

- a. Coco Health and Fitness, Inc. (“Coco Spa”) is located in Paterson, New Jersey.
- b. Gold Spa, Inc. (“Gold Spa”) was at one time located in Passaic, New Jersey. As explained further below, law enforcement has learned that Gold Spa has since ceased operating at that location and has instead begun operating under the name Coco Spa at the Coco Spa location.
- c. 785 Spa, Inc. (“785 Spa”) was at one time located in Passaic, New Jersey. As explained further below, law enforcement has learned that 785 Spa has since closed and has instead begun operating under the name Coco Spa at the Coco Spa location.
- d. Bergen Acupressure Corp. (“Bergen Acupressure”) is located in Fairview, New Jersey.
- e. JRNG, Inc. d/b/a Queen Spa (“Queen Spa”) is located in Edgewater, New Jersey.
- f. Hawaii Spa, Inc. (“Hawaii Spa”) is located in Edgewater, New Jersey.
- g. “Good Day Spa” is located in East Brunswick, New Jersey.
- h. “New Soothing Day Spa” is located in New Rochelle, New York.
- i. “Spa Wellness” is located in Toms River, New Jersey.

Online Presence

7. The Conspirators maintain a significant online presence promoting each of the SPAS. Evidence of that online presence of the SPAS demonstrate that the Conspirators have been engaged in the promotion of prostitution and have maintained, facilitated, and managed the SPAS for prostitution. The online presence show that the sexual services are being offered at the SPAS, and, based on email records and financial records reviewed by law enforcement, CHOI and PIAO are responsible for posting the online advertisements.

Company-A

8. Law enforcement has reviewed a publicly available website called “Company-A,” which offers the ability for businesses and individuals to post advertisements. Law enforcement reviewed advertisements for five of the SPAS, including Coco Spa, Gold Spa, Bergen Acupressure, Hawaii Spa, and New Soothing Day Spa. The advertisements for the SPAS typically provided the address, telephone number, hours of operation, services offered, fees charged, photos of workers, and other details about the business. Below are a sample of the posts.

- a. **Gold Spa.** On or about April 8, 2024, law enforcement visited a Company-A post for Gold Spa that claimed over 56,000 views advertises “all new 5 k-girls choose,” “XXX VIP SERVICE,” and “CLASSY & WILD Extremely SKILLED” and provides the address for the spa as well as instructions on how to park and access the building. The Company-A post also provides multiple pictures of women, such as the following:



- b. **Bergen Acupressure.** On or about April 8, 2024, law enforcement visited a Company-A post for Bergen Acupressure under the name 365 Spa that claims nearly 65,000 views; advertises “5 k-girls,” “gfe/bj/kissing,” and “hot naked nuru;” and provides the address for Bergen Acupressure. Based on my training and experience, “bj” refers to “blowjob,” which is another term for oral sex. The Company-A post also provides multiple pictures of naked women.
- c. **Coco Spa.** On or about July 8, 2024, law enforcement visited a Company-A post for Coco Spa that claims over 54,000 views; advertises “bbsfs,bbj,” “Beautiful & Attractive Young 7 Girls, and GOOD AT WHAT We Do,” “GFE/NURU GEL 4 YOU,” and “Young # Tight # CLEAN # REAL # Fun;” and provides the address as identified above as well as a telephone number. Based on my training and experience, “bbsfs” refers to “bareback sex full service,” which is a way to describe unprotected sexual intercourse. Based on

my training and experience, “bj” refers to “bareback blowjob,” which is a way to describe unprotected oral sex. The Company-A also provides multiple pictures of women with their names, the name Coco Spa, the telephone number, and the phrases “Real Photo” and “Girl friend Love Feeling” on the pictures.

- d. ***New Soothing Day Spa.*** On or about April 4, 2024, law enforcement visited a Company-A post under the name Soothing Spa that advertised “SEXY GIRLS B2B, G.F.E., NURU SERVICE,” and “Enjoy a UNFORGETTABLE TIME with 6 . . . K-Girls,” and provides the address “North Ave, New Rochelle, NY” as well as a telephone number ending in 3922. Law enforcement believes that this post advertises sexual services for New Soothing Day Spa because the New Soothing Day Spa is located on North Avenue in New Rochelle, New York, and New Soothing Day Spa posts the same telephone number on its storefront window. That same telephone number is also listed on the Company-B posts described below. The Company-A post also provides multiple pictures of women, such as the following:



9. Law enforcement believes that CHOI and PIAO control, manage, and post advertisements on Company-A for the SPAS based on the following financial information and email records.

- a. The Choi Email Account-1 received numerous emails from Company-A regarding deposits of cryptocurrency to a Company-A account with the corresponding value in U.S. Dollars listed in the email. Based on the value of U.S. Dollars listed in the emails from Company-A, the Company-A account associated with the Choi Email Account-1 transferred approximately \$19,878 to Company-A in a three-month period in April, May, and June 2024.
- b. Law enforcement lawfully obtained records from a cryptocurrency exchange platform that revealed an account held in the name of

PIAO was used to execute 88 transfers of cryptocurrency worth approximately \$66,800 U.S. Dollars to Company-A. In the account records, PIAO produced a picture of his driver's license for identification purposes, which was placed on a cell phone that was open to a payment page on Company-A:

- c. On or about September 1, 2022, CHOI received seven separate emails of what appear to be draft advertisements for Company-A at the Choi Email Account-2 for Queen Spa, Bergen Acupressure, Hawaii Spa, 785 Spa, Gold Spa, and New Soothing Day Spa. The draft advertisements used similar acronyms to describe sexual services offered at the spa as described above, such as GFE, BBJ, and BBFS, and various marketing expressions, such as "MUTUAL TOUCHING + EROTIC BODY CONTACT." Below is a draft advertisement for Bergen Acupressure juxtaposed against a portion of the advertisement law enforcement reviewed on or about July 8, 2024, which shows nearly identical language used to advertise services at Bergen Acupressure:

Choi Email Account-2



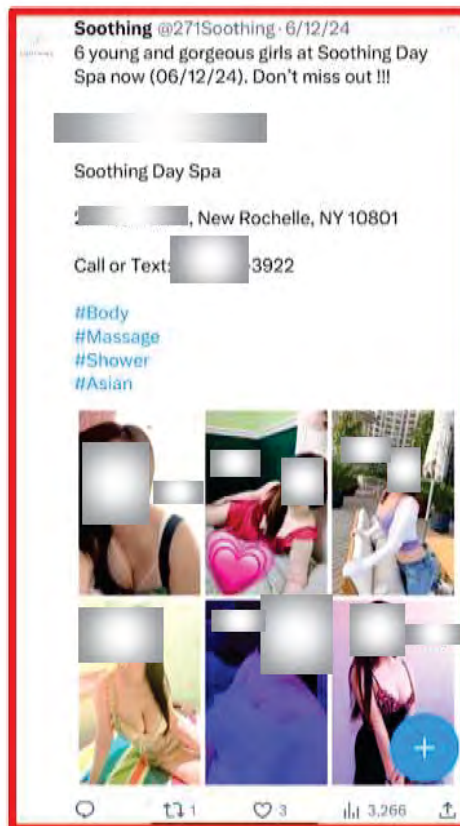
Company-A Ad



Company-B

10. Evidence obtained in this investigation shows that the SPAS post advertisements on a social media platform called “Company-B.” At least one Company-B account posts advertisements for each SPA, including @goldncoco, @HawaiiSpa1, @365spafairview, @GooDaySpa_EB, @271Soothing, and @Spawellness_TR.

- a. The Company-B posts for the SPAS often contain the addresses for each of the SPAS and telephone numbers for the spas as well as the names and pictures of the female sex workers working on a particular day. Below is a sample Company-B post for New Soothing Day Spa:



- b. In addition to posting pictures of available sex workers, the Company-B accounts for the SPAS also marketed aspects of the women. For example, on or about May 1, 2024, the Company-B account called @goldncoco, which posts advertisements for Coco Spa and Gold Spa, described a female sex worker as “very young (20s)” and “cute” and suggested that others “[t]ry her when she is fresh and innocent.” On or about March 1, 2024, that same account also marketed the fee for services and a type of rewards program for their clients: “Six beautiful and sensual girls at Gold Spa now (3/1/24)!!”

Still 160 all in. Don't forget to ask for the stamp card. Free house fee on the 8th visit." Based on my training and experience, I believe "160" referred to the fee charged for sexual services, which is the same amount charged to the UCs described below.

11. Law enforcement believes CHOI controls, manages, or operates the Company-B accounts for at least three of the SPAS based on the following.
 - a. The Choi Email Account-3 has received numerous emails from Company-B regarding login attempts or notifications for the Company-B account called @365spafairview, which posts advertisements for Bergen Acupressure. By way of example, on or about February 1, 2024, the Choi Email Account-3 received the following email from X: "We noticed a login to your account @365spafairview from a new device. Was this you?"
 - b. The Choi Email Account-1 received numerous emails from Company-B regarding a login attempt or notifications for the Company-B account called @271Soothing, which posts advertisements for New Soothing Day Spa. By way of example, on or about May 1, 2024, the Choi Email Account-1 received the following email from X: "We noticed a login to your account @271Soothing from a new device. Was this you?"
 - c. Based on subscriber information from Company-B, the Company-B account @GooDaySpa_EB, which posts advertisements for Good Day Spa, has been accessed using CHOI's Unit B IP Address.

Online Reviews

12. According to emails reviewed by law enforcement, the Piao Email Account and the Choi Email Account-2 have each left five star reviews online for some of the SPAS, including Gold Spa, Bergen Acupressure, and Queen Spa. For example, on or about May 24, 2017, the Piao Email Account gave Gold Spa a five star review and stated "Very clean place!!!" As another example, on or about September 15, 2021, the Choi Email Account-2 gave Queen Spa a five star review and stated: "Clean place and Good massage !!"

Undercover Operations.

13. Law enforcement has conducted at least five undercover operations at each of the SPAS except for Coco Spa, Good Day Spa, and New Soothing Day Spa to determine whether the employees would offer the undercover agent sexual acts in exchange for money. In each operation, each undercover agent was offered sexual services for money: a fee of \$160. During each operation, each UC was greeted by a

receptionist—typically an older, Asian female—and then introduced to a younger Asian female often dressed in lingerie. During one operation, the UC observed a room with a mattress on the floor, clothing racks with hangers of clothes, a nightstand, boxes of food, and a microwave.

14. By way of example, on or about December 18, 2023, a UC visited Queen Spa. The UC entered the location and was directed to a waiting room by an older Asian female. The UC heard loud moaning consistent with sexual noises emerging from two rooms. After a few minutes, a different woman wearing a short black dress, escorted a male out of one of the rooms. The UC was escorted into the room in which he heard the sexual noises. She advised him that everything cost \$160.00 and provided the UC a username for an app-based payment processing company (“PPC-1”) for payment. The username contained CHOI’s name. After the UC purposefully input the wrong username into PPC-1, the UC was provided with the Choi Cell Phone Number for payment. The UC then paid \$200 via PPC-1 to the PPC-1 account linked to CHOI’s cell phone number, which included the \$160 fee plus a \$40 tip. The woman subsequently instructed the UC to take off his clothes, and she then took off her clothes. When she began reaching towards the UC’s genitals, the UC stopped the massage and left the location.

15. On or about March 10, 2024, law enforcement observed that 785 Spa appeared closed. A UC called the telephone number advertised for 785 Spa and a woman advised that the massage parlor was operating at a different location and that she would text the UC the address. Immediately thereafter, the UC received a series of text messages that listed the address for Coco Spa, the hours of operation, the names of seven women, directions on where to park, and multiple pictures of Asian women dressed in lingerie and minimal clothing.

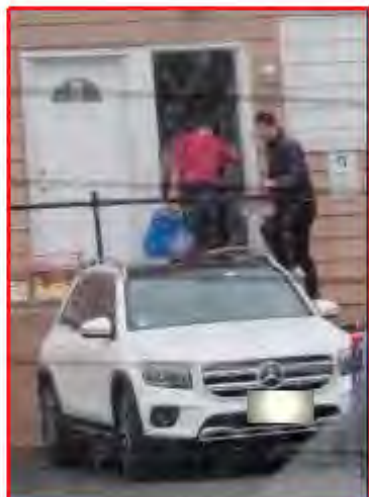
16. On or about May 30, 2024, law enforcement observed that Gold Spa appeared closed. On or about May 31, 2024, a UC sent a text message to a telephone number listed on Company-B for Gold Spa—regarding the closure. In response, the UC was informed that Gold Spa relocated to Coco Spa and that it was open from 8:00 am to 12:30 am and had seven women available.

Surveillance

17. Starting in or around January 2023 to in or around August 2024, law enforcement has conducted in-person, covert visual surveillance of the exterior of the SPAS, deployed covert cameras depicting exterior activities outside of Gold Spa, and utilized judicially approved GPS trackers on PIAO’s vehicle and CUI’s vehicle. Through this surveillance, law enforcement learned that PIAO and CUI routinely traveled to and from the SPAS.

18. Based on the surveillance described above, law enforcement has observed or tracked PIAO or CUI visit the SPAS over 100 times between in or around

February 2023 to in or around August 2024. In many instances, PIAO and CUI have been observed unloading supplies or groceries to the SPAS from one of their vehicles. As described further in the financial section below, PIAO's and CHOI's accounts at a wholesaler have been used to purchase large volumes of supplies and groceries. Below are screenshots of a video of CUI using his vehicle to drop off groceries to Gold Spa:



19. In addition to grocery deliveries, law enforcement also observed PIAO transporting Asian women in his vehicle. For example, on or about January 6, 2023, law enforcement observed PIAO transport two unidentified Asian women, one of whom had a suitcase, from Gold Spa to another location. As another example, on or about July 25, 2024, law enforcement also tracked and observed PIAO transport two unidentified Asian women with bags to the Good Day Spa.

20. Based on my training and experience, I believe PIAO and CUI have collected cash from the SPAS. As described below, I made this determination based on observations of PIAO, CUI, and others entering a SPA and exiting shortly thereafter with items capable of holding cash. As also described in the financial section, bank accounts associated with the Conspirators or the SPAS sometimes received cash deposits after the suspected cash pickups.

- a. On or about February 2, 2023, at approximately 10:13 am, PIAO arrived at Gold Spa with an unidentified Asian woman. The unidentified Asian woman entered Gold Spa with a green bag and exited the location at approximately 10:32 am carrying an oversized white bag. PIAO and the unidentified Asian female departed the location with the bag. A few days later, on or about February 6, 2023, PIAO deposited approximately \$5,139 in cash into his personal bank account. On or about February 15, 2023, CHOI made two cash transactions in the amounts of \$2,000 and \$6,000 at two different banks.

- b. On or about March 1, 2023, PIAO drove to 785 Spa with an unidentified Asian woman. At approximately 11:30 am, PIAO entered 785 Spa and exited 785 Spa approximately two minutes later with a white box and left the location. On or about March 7, 2023, PIAO made two cash deposits in the amounts of \$5,445 and \$6,000 to two separate personal bank accounts.
- c. On or about January 30, 2024, between the hours of approximately 9:17 a.m. and 12:57 a.m., law enforcement physically surveilled CUI drive to Bergen Acupressure, 785 Spa, Gold Spa, and the Good Day Spa and then back to his house. At Bergen Acupressure, CUI carried a black plastic bag. At 785 Spa, CUI entered with a black plastic bag and exited approximately two minutes later and placed something in the front seat of his car. At Gold Spa, CUI unloaded groceries, entered Gold Spa with two or three Asian women in robes, exited with a large blue shopping bag that he placed in the passenger seat, and took two bags from the passenger seat and placed them in the rear of the vehicle. Finally, at Good Day Spa, CUI unloaded a large bag of rice, entered Good Day Spa, and then exited with a large blue bag and a black plastic bag that he placed in his car.
- d. On or about July 12, 2024, law enforcement tracked CUI leave his house and drive to a grocery store and then a wholesaler. While at the wholesaler, law enforcement physically observed CUI purchase, among other items, paper towels and mouthwash. Then, law enforcement tracked and physically surveilled CUI drive to Good Day Spa where CUI met with an unidentified Asian woman, unloaded groceries and other supplies, handed the woman a black plastic bag, and exited a few minutes later with a black plastic bag weighted down with what appeared to be brick-shaped objects inside. Based on my training and experience, I believe CUI exited Good Day Spa with cash in the black bag. Below is a still frame of a video of CUI leaving a side door of Good Day Spa with the black plastic bag as well as a picture of the black plastic bag on the seat of CUI's vehicle that law enforcement observed:



21. Between on or about January 3, 2023 to on or about May 13, 2024, law enforcement observed at least approximately 93 males enter the SPAS and then exit approximately on average 10 to 30 minutes later. Based on my training and experience, this type of activity is not consistent with that of a legitimate massage parlor but one that engages in illicit criminal activity such as prostitution. Indeed, the permit paperwork submitted for Bergen Acupressure suggests that the massage parlor would provide most services in increments of an hour.

Financial Records

22. The Conspirators have each derived money from the SPAS. The SPAS collect their fees by accepting payments through, among other methods, payment processing companies and cash. Those funds are then routinely transferred through a series of bank accounts, including the SPAS' business bank accounts and the Conspirators' personal bank accounts. After those transfers, the Conspirators have used those funds to purchase items such as real estate, motor vehicles, jewelry, groceries, and supplies.

23. Law enforcement knows that PIAO and CHOI have managed the SPAS because they are signatories on the SPAS' business bank accounts. CHOI is a signatory on the bank accounts for Coco Spa, 785 Spa, Gold Spa, New Soothing Day Spa, and Queen Spa. In records submitted to a bank, CHOI is also listed as the Secretary of Gold Spa as early as October 16, 2017, the Vice President of 785 Spa as early as February 5, 2020, and the Secretary of New Soothing Day Spa as early as September 19, 2021. Similarly, PIAO is listed as a signatory on the bank accounts for 785 Spa, Gold Spa, Bergen Acupressure, Good Day Spa, and Hawaii Spa. In records submitted to a bank, PIAO is also listed as the 50% owner of Bergen Acupressure as early as August 27, 2021, the President of 785 Spa as early as October 31, 2022, and the President and Director of Queen Spa from on or about February 12, 2018, to on or about October 20, 2022.

24. The investigation has revealed that CHOI was directly involved with accepting payments for sexual services at the SPAS through her PPC-1 account. As described above, a UC paid for services at Queen Spa by sending funds to CHOI's PPC-1 account through the Choi Cell Phone Number. PPC-1 is a digital payments network that assists individuals in electronically transferring money from their bank account to another individual's bank account. Based on information obtained from PPC-1, CHOI's PPC-1 account listed the Choi Cell Phone Number as the phone number on that account, and a Gold Spa business account, a Queen Spa business account, and CHOI's personal bank account as accounts to transfer money to and from PPC-1. Law enforcement further believes that this account belongs to CHOI because the account was accessed from CHOI's Unit B IP Address. After the UC made the payment, law enforcement uncovered numerous other payments that CHOI received on behalf of the SPAS. Between in or around August 21, 2021 to in or around January 2024, CHOI's PPC-1 account received approximately 254 payments from 184 individuals, the vast majority of which were approximately \$160.00—the same amounts that the UCs were charged for sexual services as described above—and appear to have come from males based on the transferors' names. Some individuals made several payments for services in a single day.

25. Similar to CHOI, PIAO also held an account in his name at a different payment processing company ("PPC-2"). PPC-2 is a digital payments network that assists individuals in electronically transferring money from their bank account to another individual's bank account. In 2023, PIAO's PPC-2 account received \$6,020, the vast majority of which were approximately \$160.00—the same amounts that the UCs were charged for sexual services as described above.

26. Evidence obtained in this investigation also revealed that the Choi Cell Phone Number was used to control an account at a third payment processing company ("PPC-3") for Gold Spa used to route Gold Spa funds (the "Gold Spa PPC-3 Account"). PPC-3 is a digital payments network that assists individuals in electronically transferring money from their bank account to another individual's bank account. Law enforcement knows this account is controlled by CHOI because records obtained from PPC-3 show that the Choi Cell Phone Number is listed as the phone number on the Gold Spa PPC-3 Account. I know, from training, experience, and the investigation, that PPC-3 users direct transferred money to other users by those users' phone numbers, and therefore that control over a PPC-3 account likely evinces control over that account's corresponding phone number, and vice versa. Between in or around June 2021 to in or around December 2023, the Gold Spa PPC-3 Account received approximately 2,522 PPC-3 payments totaling approximately \$383,839.75, the vast majority of which were approximately \$160.00—the same amounts that the UCs were charged for sexual services as described above—and appear to have come from males based on the transferors' names. Some individuals made several payments for services in a single day.

27. Over the three-year period from 2021 to 2023, PIAO and CHOI deposited approximately \$248,097.50 in cash in total in their personal bank accounts. In 2023, PIAO and CHOI appear to have structured large cash deposits into smaller transactions using different banks. For example, on or about January 10, 2023, \$16,000 total was deposited into the bank accounts for PIAO and CHOI using approximately \$4,000 increments: \$4,000 each was deposited into two of PIAO’s bank accounts and \$4,000 each was deposited into two of CHOI’s bank accounts. Additionally, in or around January 2023, CUI also made two cash deposits into his personal bank in the amounts of \$2,140 and \$2,900. Based on my training and experience, individuals structure deposits in this manner to avoid certain reporting obligations, and this practice is often related to money laundering.

28. Over a three-year period, from in or around 2021 to in or around 2023, Gold Spa, Queen Spa, 785 Spa, and Bergen Acupressure received nearly \$2.9 million in deposits, of which only \$5,600 included cash deposits. During that same time period, the bank accounts associated with the SPAS, among other things, spent approximately \$217,090 on what appear to be online advertising expenses, withdrew approximately \$209,014 in cash withdrawals, made nearly approximately \$88,000 in purchases at a wholesaler, and spent nearly approximately \$60,000 at a supermarket.

29. Based on records obtained from a wholesaler, the SPAS used the wholesaler accounts in the name of PIAO and CHOI. The wholesaler is a retail store that sells items in bulk, such as groceries, cleaning supplies, and toiletry products, to its members. Between in or around 2021 to in or around 2023, PIAO’s and CHOI’s wholesaler accounts were used to purchase, among other things, the following:

Items	Approximate Number of Units	Approximate Amount
Mouthwash	1,451	\$19,826.49
Paper towel	836	\$15,895.24
Tissues	673	\$13,592.17
Disinfecting Spray	163	\$2,211.27

Based on my training and experience, the purchase of large quantities of mouthwash is not consistent with that of a legal massage parlor. Based on my experience with sex trafficking cases, I know that sex workers often use mouthwash in between different clients.

30. Bank records show that on or about January 29, 2024, PIAO incorporated a corporate entity, “Company-C.” In records submitted to the business bank account, PIAO and JIN are each listed as 50% owners of and signatories for Company-C.

- a. In or around January and February 2024, pursuant to bank records, Company-C deposited approximately \$76,000 collectively in checks from New Soothing Day Spa, Bergen Acupressure, Good Day Spa, Hawaii Spa, Queen Spa, Gold Spa, and 785 Spa.
- b. On or about February 29, 2024, JIN deposited \$30,000 in cash into the Company-C's bank account. Based on bank surveillance reviewed by law enforcement, JIN and CUI visited the bank with a large black bag similar to the plastic bags that law enforcement observed CUI use when entering and exiting the SPAS. The surveillance footage then shows CUI removed bundles of cash from the plastic bag and placed it on the teller's counter. Below are two images from surveillance footage of CUI holding the bag in the lobby of Bank-1 and JIN and CUI both at the teller with the black bag and bundles of cash on the counter:



- c. On or about April 26, 2024 and May 8, 2024, JIN and CUI visited an ATM and deposited \$4,000 and \$3,000, respectively, in cash in five separate transactions on each visit. Below is an image from surveillance footage of JIN and CUI at the ATM depositing cash on or about April 26, 2024:



- d. On or about May 14, 2024, JIN deposited \$20,000 in cash into Company-C's bank account. Based on bank surveillance reviewed by law enforcement, JIN and CUI visited the bank with a large black bag from which JIN removed multiple bundles of cash. Below is an image from surveillance footage of JIN and CUI at the teller depositing the cash:



31. With the money generated from the SPAS, the Conspirators used approximately \$983,831.73 as a down payment to purchase the two-unit house described above for \$2,150,000, which the Conspirators put in the name of JIN and CUI.

Telephone Records

32. As described above, each of the SPAS advertises a telephone number for customers to contact in posts to Company-B. Evidence obtained by law enforcement shows that CHOI, PIAO, and JIN communicated with the telephone numbers for the SPAS as well as with each other on a frequent basis.

- a. Based on records obtained from a cell phone provider, the Choi Cell Phone Number has contacted the telephone numbers for the SPAS, including at least approximately 10 contacts with Gold Spa, 63 contacts with Hawaii Spa, 19 contacts with Queen Spa, 49 contacts with Bergen Acupressure, 21 contacts with New Soothing Day Spa, 62 contacts with 785 Spa, 43 contacts with Good Day Spa, and 25 contacts with Coco Spa.
- b. Based on records obtained from a cell phone provider, the Piao Cell Phone Number has contacted the telephone numbers for the SPAS, including at least approximately 6 contacts with Hawaii Spa, 15 contacts with Bergen Acupressure, 1 contact with New Soothing Day Spa, 3 contacts with 785 Spa, 1 contact with Good Day Spa, and 3 contacts with Coco Spa.

- c. Based on records obtained from a cell phone provider, the Jin Cell Phone Number has contacted the telephone numbers for the SPAS, including at least approximately 1 contact with Coco Spa, 1 contact with Bergen Acupressure, and 1 contact with Good Day Spa.

Prior Law Enforcement Activity

33. Over the years, law enforcement has executed search warrants and made arrests at some of the SPAS. Despite that law enforcement activity, those SPAS continued to operate as illicit massage parlors.

34. On or about February 4, 2021, it appears PIAO scanned and emailed to himself at the Piao Email Account a packet of documents related to the 2019 search of 785 Spa pursuant to a search warrant and the arrest of eight individuals for prostitution-related offenses. The packet included a summary of the execution of the search warrant, including law enforcement observing three pairs of men and women naked in three different massage rooms. The document also stated that the officers observed several used condoms throughout 785 Spa, one box containing a large amount of unused condoms, and approximately \$5,813 in cash. Despite Piao possessing these documents, law enforcement has observed that 785 Spa as well as the other SPAS continue to operate as illicit massage parlors.