

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

HONG RU LIN, a/k/a "Bruce," and
KENA ZHAO, a/k/a "Angela,"

Defendants.

SEALED INDICTMENT

23 Cr. 469

COUNT ONE
(Travel Act)

The Grand Jury charges:

1. From at least in or about September 2020, through at least in or about September 2023, in the Southern District of New York and elsewhere, HONG RU LIN, a/k/a "Bruce," and KENA ZHAO, a/k/a "Angela," the defendants, knowingly traveled in interstate and foreign commerce and used the mail and a facility in interstate and foreign commerce, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely, prostitution offenses in violation of federal law and the laws of the State in which they were committed, and thereafter performed and attempted to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, and aided and abetted the same, to wit, LIN and ZHAO used cellphones and internet facilities to promote, manage, and carry on a criminal business engaged in prostitution in at least six massage parlors (the "Massage

Parlors”), in violation of N.Y. Penal Law §§ 230.00 (prostitution), 230.20(1) (promoting prostitution in the fourth degree), and 230.25(1) (promoting prostitution in the third degree).

(Title 18, United States Code, Sections 1952(a)(3)(A) and 2.)

COUNT TWO
(Conspiracy to Violate the Travel Act)

The Grand Jury further charges:

2. From at least in or about September 2020, through at least in or about September 2023, in the Southern District of New York and elsewhere, HONG RU LIN, a/k/a “Bruce,” and KENA ZHAO, a/k/a “Angela,” the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, knowingly traveling in interstate and foreign commerce and using the mail and a facility in interstate and foreign commerce, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely, prostitution offenses in violation of federal law and the laws of the State in which they were committed, and thereafter performing and attempting to perform an act to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, in violation of Title 18, United States Code, Section 1952(a)(3)(A).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. At all times relevant to this Indictment, LIN and ZHAO, the defendants, used a private chatroom accessible through their cellphones to manage and operate the Massage

Parlors located in Mahopac, Yonkers, and New York, New York, including by assigning customers to employees, monitoring business income, and setting employee performance targets;

b. On or about September 2, 2020, ZHAO, the defendant, incorporated one of the Massage Parlors, which is located in Mahopac, New York;

c. On or about December 28, 2021, ZHAO, the defendant, incorporated one of the Massage Parlors, which is located in Queens, New York;

d. On or about April 12, 2022, ZHAO, the defendant, incorporated one of the Massage Parlors, which is located in Yonkers, New York;

e. On or about December 7, 2022, ZHAO, the defendant, greeted a customer at one of the Massage Parlors, which is located in Mahopac, New York, and removed the customer's undergarments before another employee of the Massage Parlor offered to provide commercial sex acts to the customer;

f. From in or about January 2023 through in or about August 2023, LIN and ZHAO, the defendants, traveled together regularly to the various Massage Parlors to bring materials to the Parlors, maintain the Parlors, and communicate with individuals inside the Parlors;

g. On or about January 12, 2023, an employee of one of the Massage Parlors, which is located in Yonkers, New York, offered to provide a commercial sex act to a customer;

h. On or about August 28, 2023, an employee of one of the Massage Parlors, which is located in Mahopac, New York, offered to provide a commercial sex act to a customer;

i. On or about August 28, 2023, an employee of one of the Massage Parlors, which is located in Yonkers, New York, offered to provide a commercial sex act to a customer;

j. On or about August 29, 2023, an employee of one of the Massage Parlors, which is located in Queens, New York, offered to provide a commercial sex act to a customer; and

k. On or about September 6, 2023, an employee of one of the Massage Parlors, which is located in New York, New York, offered to provide a commercial sex act to a customer.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

4. As a result of committing the offenses alleged in Counts One and Two of this Indictment, HONG RU LIN, a/k/a “Bruce,” and KENA ZHAO, a/k/a “Angela,” the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

5. 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 person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



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