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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

REAL PROPERTY LOCATED AT 14420
TUKWILA INTERNATIONAL
BOULEVARD, TUKWILA, WASHINGTON,
KING COUNTY PARCEL NUMBER
004000-0175,

REAL PROPERTY LOCATED AT 14440
TUKWILA INTERNATIONAL
BOULEVARD, TUKWILA, WASHINGTON,
KING COUNTY PARCEL NUMBER
004000-0190,

REAL PROPERTY LOCATED AT 3747
146TH STREET, TUKWILA,
WASHINGTON, KING COUNTY PARCEL
NUMBER 004000-0911, and

REAL PROPERTY LOCATED AT 3754
175th STREET, SEATAC, WASHINGTON,
KING COUNTY PARCEL NUMBER
538100-0439,

Defendants.

NO.

COMPLAINT FOR FORFEITURE *IN REM*

1 COMES NOW, the United States of America, by and through Jenny A. Durkan,
2 United States Attorney for the Western District of Washington, and Richard E. Cohen,
3 Assistant United States Attorney for said District, and alleges:

4 **NATURE OF THE ACTION**

5 1. This is a complaint for the forfeiture *in rem* of the above-captioned
6 Defendant Real Properties pursuant to 21 U.S.C. § 881(a)(7) for violations of 21 U.S.C. §
7 856(a)(2) (Maintaining a drug involved premises), and 21 U.S.C. 841(a)(1) (distribution
8 of controlled substances) as to the properties more particularly described in paragraphs 4a
9 through 4c below; pursuant to 18 U.S.C. § 981(a)(1)(A) for violation of 18 U.S.C. §
10 1956(a)(1)(B)(i) (Concealment Money Laundering) as to the property more particularly
11 described in paragraph 4a and 4d; and pursuant to 18 U.S.C. § 981(a)(1)(A) for violation
12 of 18 U.S.C. § 1956(a)(1)(A)(i) (Promotional Money Laundering) as to the property more
13 particularly described in paragraph 4a.

14 2. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1345,
15 and 28 U.S.C. § 1355.

16 3. This Court has venue pursuant to 28 U.S.C. § 1395.

17 **THE DEFENDANTS *IN REM***

18 4. The Defendant Real Properties are now and during the pendency of this
19 action will be in the jurisdiction of this Court, and, are described as follows:

20 a. Real property located at 14420 Tukwila International Boulevard,
21 Tukwila, Washington, King County parcel number 004000-0175, also
22 commonly known as the Great Bear Motor Inn, together with its buildings,
23 improvements, appurtenances, fixtures, attachments and easements, more
24 particularly described as:

25 THAT PORTION OF LOTS 12 AND 13, BLOCK 2 ADAMS HOME
26 TRACTS, ACCORDING TO THE PLAT THEREOF, RECORDED IN
27 VOLUME 11 OF PLATS, PAGE 31, IN KING COUNTY,
28 WASHINGTON, LYING EAST OF STATE ROAD NO 1, NORTH OF A
LINE 25 FEET NORTH OF AND PARALLEL WITH THE SOUTH LINE

1 OF SAID LOTS AND SOUTH OF A LINE 125 FEET NORTH OF AND
2 PARALLEL WITH THE SOUTH LINE OF LOT 13, AND

3 THE SOUTH 125 FEET OF THE WEST 60 FEET OF LOT 14, BLOCK 2,
4 ADAMS HOME TRACTS, ACCORDING TO THE PLAT THEREOF,
5 RECORDED IN VOLUME 11 OF PLATS, PAGE 31, IN KING
6 COUNTY, WASHINGTON;

7 b. Real property located at 14440 Tukwila International Boulevard,
8 Tukwila, Washington, King County parcel number 004000-0190, also
9 commonly known as the Boulevard Motel, together with its buildings,
10 improvements, appurtenances, fixtures, attachments and easements, more
11 particularly described as:

12 THE SOUTH 25 FEET OF TRACTS 12 AND 13 AND THE NORTH 75
13 FEET OF TRACTS 24 AND 25 BLOCK 2 ADAMS HOME TRACTS,
14 ACCORDING TO THE PLAT THEREOF RECORDED IN VOLUME 11
15 OF PLATS, PAGE 31, IN KING COUNTY, WASHINGTON,
16 EXCEPT THOSE PORTIONS THEREOF CONVEYED TO THE STATE
17 OF WASHINGTON FOR HIGHWAY BY DEEDS RECORDED UNDER
18 RECORDING NUMBERS 2014228 AND 2014230;

19 c. Real property located at 3747 S. 146th Street, Tukwila, Washington,
20 King County parcel number 004000-0911, also commonly known as the
21 Travelers Choice Motel, together with its buildings, improvements,
22 appurtenances, fixtures, attachments and easements, more particularly
23 described as:

24 THE EAST 88 FEET OF LOT 11, BLOCK 7, ADAMS HOME TRACTS,
25 ACCORDING TO THE PLAT THEREOF RECORDED IN VOLUME 11
26 OF PLATS, PAGE(S) 31, IN KING COUNTY, WASHINGTON. EXCEPT
27 THE NORTH 10 FEET THEREOF CONVEYED TO THE CITY OF
28 TUKWILA BY DEED RECORDED UNDER RECORDING NUMBER
9208261189;

and

1 d. Real property located at 3754 South 175th Street, Seatac,
2 Washington, King County parcel number 538100-0439, together with its
3 buildings, improvements, appurtenances, fixtures, attachments and
4 easements, more particularly described as:

5 BEGINNING AT A POINT ON THE WEST LINE OF SECTION 27,
6 TOWNSHIP 23 NORTH, RANGE 4 EAST, W.M., IN KING COUNTY,
7 WASHINGTON, DISTANT SOUTH 00°01'11" WEST 1,835 29 FEET
8 FROM THE NORTHWEST CORNER OF SAID SECTION 27,
9 THENCE SOUTH 89°59'10" EAST 730 FEET,
10 THENCE SOUTH 00°02'46" EAST 2493 00 FEET,
11 THENCE SOUTH 89°59'10" EAST 1,200 00 FEET TO THE TRUE
12 POINT OF THIS DESCRIPTION,
13 THENCE CONTINUING SOUTH 89°59'10" EAST 100 FEET,
14 THENCE SOUTH 00°02'46" EAST 107 FEET,
15 THENCE NORTH 89°59'10" WEST 100 FEET,
16 THENCE NORTH 00°02'46" WEST 107 FEET TO THE TRUE POINT
17 OF BEGINNING,

18 (ALSO KNOWN AS A PORTION OF LOT 16, BLOCK 37, MCMICKEN
19 HEIGHTS NO 4, ACCORDING TO THE UNRECORDED PLAT
20 THEREOF).

21 **FACTUAL BASIS FOR FORFEITURE**

22 5. The facts supporting forfeiture of the defendant real properties described in
23 paragraphs a through c above are as set forth in Exhibit A , Affidavit of Bureau of
24 Alcohol Tobacco and Firearms Special Agent Joel E. Miller, Jr. in Support of Search
25 Warrants, which is attached hereto and incorporated as if fully set forth herein.

26 In addition to establishing the use of the three properties to distribution controlled
27 substances, and their maintenance as drug involved premises, the Miller affidavit at
28 paragraphs 88 through 92 establishes that large amounts of cash were deposited into the
Wells Fargo Bank Business Bank Account No. XXX3997 for the Ramada Ltd. in
addition to personal bank accounts. These accounts in turn were used to purchase
cashier's checks used for the down payment on the purchase of the Great Bear Motor Inn.

1 6. The facts supporting the forfeiture of the defendant property commonly
2 known as 3754 South 175th Street, Seatac, Washington are as follows:

3 a. This property is the residence of Kulwinder Saroya, located at 3754 S.
4 175th St., SeaTac, WA. King County property records show that Kulwinder Saroya
5 purchased the property located at 3754 S. 175th St., SeaTac, WA (King County Parcel
6 No. 538100-0439) for \$185,000 plus closing costs in September 2006. Saroya obtained
7 mortgage loans from Countrywide Home Loans of \$148,000 and \$18,500. In addition
8 Saroya was required to pay an additional \$23,978.91. A review of King County
9 Department of Assessments records show that in October 2007 Saroya obtained a permit
10 to demolish the existing residence at 3754 S. 175th St., SeaTac, WA. Records show that
11 the demolition was complete as of January 2008. A building permit for a single family
12 residence with attached garage and bonus room was issued in March 2008. Records
13 show that the permit was complete as of March 2009. The permit value was for
14 \$434,547. The residence constructed is a two story single family residence with 4,480
15 square feet total finished area. The house has six bedrooms and 6.25 baths. Saroya is
16 identified as the taxpayer for the property. King County Records did not indicate Saroya
17 obtained a mortgage to finance the construction of the residence. The existing \$148,000
18 Countywide Mortgage he obtained in September 2006 was paid when he refinanced and
19 obtained a \$265,000 mortgage loan from Wealthbridge Mortgage Corp in April 2010.

20 b. Mortgage payments on 3754 S. 175th St., SeaTac, WA in the amount of
21 \$1,483.92 were paid from Bank of America checking account #XXXX8048, in the name
22 of Kulwinder Saroya and Armandeep Kaur, for January and February 2011. Payments in
23 the amount of \$1,483.92 were paid from Chase Premier checking account
24 #XXXXXX0717, in the name of Kulwinder Saroya for March thru December 2011. The
25 \$1,500 cash deposits and mortgage payments were the only activity in the account in
26 2011, other than \$650 in deposits and interest on the account. Monthly mortgage
27 payments in the amount of \$1,483.92 were paid from Chase Premier checking account
28 #XXXXXX0717, in the name of Kulwinder Saroya for January thru November 2012, the

U.S. v. Real Property located at 14420 Tukwila International Blvd., et al.
COMPLAINT FOR FORFEITURE *IN REM* - 5

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 last date for which records were reviewed. Deposits in 2012 , totaled \$20,346 consisting
2 of \$16,100 in cash plus a \$4,246 US Treasury refund. All of the mortgage payments
3 from the Chase Premier checking account in 2011 and 2012 were automated clearing
4 house (ACH) payments to JP Morgan Chase preceded by a \$1,500 cash deposit.

5 c. Instead of depositing all of the illegally derived cash into the motels'
6 business accounts and paying himself salaries or profits, it appears that Saroya has
7 deposited a significant amount of this cash into his Chase Premier checking account
8 #XXXXXX0717, in an attempt to conceal and disguise the illegal source of the cash, and
9 then used the account to make mortgage payments.

10 **GROUND FOR RELIEF**

11 By reason of the foregoing, the above-referenced Defendant Real Properties
12 described more particularly in paragraphs 4a through 4c are subject to forfeiture to the
13 United States pursuant to 21 U.S.C. § 881(a)(7) as property managed or controlled for the
14 purposes of unlawful storage, distribution, or use of a controlled substance, in violation of
15 21 U.S.C. § 856(a)(2) (Maintaining a Drug Involved Premises), and as property used or
16 intended to be used to facilitate the distribution of controlled substances, in violation of
17 21 U.S.C. § 841(a)(1).

18 By the reason of the foregoing, the above referenced Defendant Real Property
19 described more particularly in paragraphs 4a and 4d are subject to forfeiture pursuant to
20 18 U.S.C. § 981(a)(1)(A) as property involved in money laundering or is property
21 traceable to such property, in violation of 18 U.S.C. § 1956(a)(1)(B)(i) (Concealment
22 Money Laundering), in that these properties were purchased and/or mortgage payments
23 were made on loans secured by the properties, through use of bank accounts funded with
24 large cash deposits.

25 In addition, by reason of the foregoing, the above referenced Defendant Real
26 Property described more particularly in paragraph 4a, the Great Bear Motor Inn, is
27 subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) as property involved in, and
28 property traceable to property involved in money laundering in violation of 18 U.S.C. §

U.S. v. Real Property located at 14420 Tukwila International Blvd., et al.
COMPLAINT FOR FORFEITURE *IN REM* - 6

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

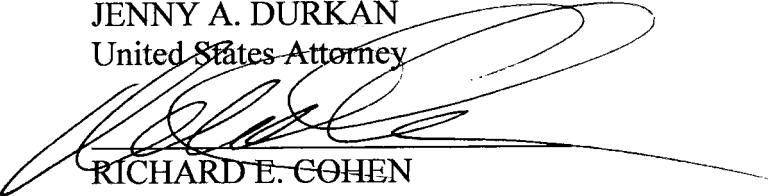
1 1956(a)(1)(A)(i) (Promotional Money Laundering), in that the property was purchased
2 with proceeds laundered through business and personal bank accounts with the intent to
3 promote the carrying on of specified unlawful activity, maintaining a drug involved
4 premises and distribution of controlled substances.

5 WHEREFORE, the United States respectfully requests that due process issue to
6 enforce the forfeiture of the defendant real properties, that due notice be given to all
7 interested persons to appear and show cause why forfeiture of the defendant real
8 properties should not be decreed, that the defendant real properties be condemned as
9 forfeited to the United States to be disposed of according to law, and for such other and
10 further relief as the Court may deem just and proper.

11 DATED this 26th day of August, 2013.

12 Respectfully submitted,

13
14 JENNY A. DURKAN
United States Attorney

15
16 
17 RICHARD E. COHEN
Assistant United States Attorney
18 700 Stewart Street, Suite 5220
Seattle, WA 98101
19 Telephone: (206) 553-2242
20 Fax: (206) 553-6934
Email: Richard.E.Cohen@usdoj.gov

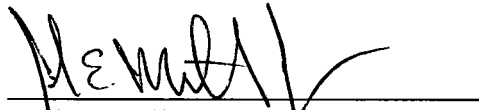
21 *Attorney for Plaintiff United States*
22
23
24
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VERIFICATION OF COMPLAINT

STATE OF WASHINGTON)
)
COUNTY OF KING) ss

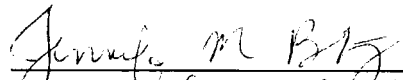
I, Joel E. Miller, Jr., declare under penalty of perjury that the following is true and correct to the best of my knowledge:

I am a Special Agent with the Bureau of Alcohol Tobacco and Firearms and am assigned to this case. I have read the attached Complaint and know the contents thereof; I have furnished the information contained in the Complaint based upon my own investigation and that of other reliable official Government sources; and, based on information and belief, the allegations contained in the Complaint are true.


Joel E. Miller, Jr. Special Agent
Bureau of Alcohol Tobacco and Firearms

SUBSCRIBED and SWORN to before me this 26th day of August, 2013, by
Joel E. Miller, Jr.




Print: Jennifer M Birtz
Notary Public in and for the
State of Washington, residing
At Seattle, King Co.
Expires: 7/4/15

AFFIDAVIT

1
2 STATE OF WASHINGTON)
3) ss
4 COUNTY OF KING)

5 I, Joel E. Miller Jr., Special Agent, Alcohol, Tobacco, Firearms and Explosives (ATF),
6 being first duly sworn on oath, deposes and says:

7
8 **AFFIANT BACKGROUND**

9 1. I, Joel E. Miller Jr., being duly sworn, am an “investigative or law enforcement
10 officer of the United States” within the meaning of Title 18, United States Code,
11 Section 2510(7). I am currently employed as a Special Agent with the Bureau of
12 Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice,
13 and have been so employed since August 23, 2004. ATF’s primary investigative
14 jurisdiction is enforcing Federal laws concerning firearms, explosive and arson
15 violations. Along with investigating those violations I have investigated Federal
16 narcotics violations. I am classified and trained as a Federal Law Enforcement Officer,
17 with Federal statutory arrest authority. I have completed a twelve (12) week Criminal
18 Investigator Training Program, and the fourteen (14) week ATF Special Agent Basic
19 Training academy taught at the Federal Law Enforcement Training Center located in
20 Glynco, Georgia. I have completed a Complex Case Investigations class lasting one (1)
21 week. That course consists of instruction on how to identify, investigate and prepare for
22 prosecution in “RICO,” “Continuing Criminal Enterprise,” and “Hobbs Act” violation
23 criminal cases.

24 2. I received a Bachelor of Science degree in Accountancy and Government from
25 California State University, Sacramento in June of 2001. Over the course of my career I
26 have directed numerous investigations that involve the illegal possession and trafficking
27 of firearms, arson, explosives, and narcotics. In connection with some of these
28 investigations, I have supervised and controlled undercover agents/officers and

1 confidential informants. I have participated in searches of residences and businesses for
2 firearms, ammunition and narcotics.

3 **BACKGROUND OF THE INVESTIGATION**

4 3. In 2011, Tukwila, a town of approximately 19,000 people, had approximately
5 3,110 crimes committed within its city limits. During that year, Tukwila's overall crime
6 rate (the number of crimes committed per 1,000 residents) was four times higher than the
7 crime rate for King County and the State of Washington. Tukwila's violent crime rate
8 was over three times higher. A significant portion of the criminal activity in Tukwila
9 takes place on a two block section of Tukwila International Boulevard where a number of
10 motels are located.

11 4. During 2011 and 2012, approximately 17 percent of the Tukwila Police
12 Department's calls for service were to three motels -- the Boulevard Motel (hereinafter
13 "the Boulevard"), the Travelers Choice Motel (hereinafter "the Travelers Choice"), and
14 the Great Bear Motor Inn (hereinafter "the Great Bear") (collectively, "the Target
15 Motels"). The crimes for which police responded to the Target Motels include, among
16 others: rape, robbery, assault, drug transactions, gun crimes, prostitution, and possession
17 of stolen property. The Target Motels are all within one block of each other. The Target
18 Motels are each described in greater detail in Attachment A.

19 5. The Target Motels generate a significant number of calls for police service.
20 Pursuant to Tukwila Municipal Code Section 5.60.030, "Safety in Overnight Lodging,"
21 Tukwila tracks the number of calls for service to each motel/hotel, and imposes
22 additional requirements to ensure guest safety for motels/hotels for those with a rate of
23 more than .25 calls for service per room on a semi-annual basis. Even more rigorous
24 requirements are required of those motels/hotels with greater than 1.00 calls for service
25 per room on a semi-annual basis.

26 6. Since at least 2006, the Target Motels have consistently been among the top five
27 motels in Tukwila with the highest calls for police service per room, and their ratio of
28 calls is significantly higher than other hotels in Tukwila. For example, the Boulevard,

1 which has 27 rooms, had 223 calls for service from July 1, 2012, to June 30, 2013, with
2 an annual ratio of 7.96 calls for service per room. During this same time frame, the Great
3 Bear, with 35 rooms, had 173 calls for service, with an annual ratio of 4.94 calls for
4 service per room. During this same time frame, the Travelers Choice, which has 34
5 rooms, had an annual ratio of 2.97 calls for service per room, or 101 calls for service
6 total. In contrast, the hotel with the lowest ratio for the same time period was the
7 Hampton Inn at .14 calls for service per room (21 calls for service; 154 rooms). The
8 hotel with the median ratio for the same period was the Extended Stay America, with .61
9 calls for service per room (59 calls for service; 96 rooms). Of the twenty-three hotels in
10 Tukwila subject to the Safety in Overnight Lodging ordinance, the Target Motels
11 comprised three of the four hotels with the highest rates of calls for service per room
12 during the July 2012 to June 2013 time frame.

13 7. Due to both the data that suggest a predominance of crime in the Target Motels,
14 and anecdotal reports from law enforcement personnel and community members
15 regarding the predominance of crime in the Target Motels, the ATF and the Tukwila
16 Police Department (TPD) partnered in an effort to determine how best to reduce crime in
17 the Target Motels. As described below, the investigation revealed that the owners of the
18 properties are engaging in, encouraging, and making significant cash profits from
19 criminal activity at the Target Motels.

20 **THE TARGET MOTEL OWNERS**

21 8. The ownership of the Target Motels is a complicated matter, due to the use of a
22 number of Limited Liability Companies (LLCs) with overlapping members, and differing
23 agents. The following is a list of the targets of this investigation who I believe are either
24 owners of the Target Motels or are associated with the owners of the Target Motels.
25 Collectively, I refer to the three people discussed below as “the Target Owners.”
26 Included next to their names are the motels and companies with which they are associated
27 and the crimes for which there is probable cause to believe they are committing or have
28 committed. Surveillance suggests that each of the Target Owners has a primary

1 association with one or more of the Target Motels, however, all of the Target Owners
2 have been seen at each of the Target Motels.

3 9. **Kulwinder “Chris” Saroya**: Saroya primarily manages the Travelers Choice.
4 The Travelers Choice was purchased by M. Jaspa Company, LLC in July 2002. The
5 Certificate of Formation for M. Jaspa Company was filed with the Washington Secretary
6 of State on June 18, 2002. Saroya and Jaspal Singh are the listed members of the
7 company, with Jaspal Singh listed as the registered agent.

8 10. Saroya, together with Jaspal Singh, is also listed as a member of N K Saroya,
9 LLC. N K Saroya purchased the Great Bear in November 2012. Saroya is listed as the
10 registered agent for this company.

11 11. Saroya, together with Jaspal Singh and his wife, Kanwaljit Kaur, are owners of N.
12 H. Saroya, LLC, a company that, according to Washington State records, owns the
13 Ramada Limited, which is also located in Tukwila.¹

14 12. There is probable cause to believe that Saroya has committed the crimes of
15 Conspiracy to Maintain a Drug Involved Premises, Maintaining a Drug Involved
16 Premises, Distribution of Controlled Substances, Conspiracy to Distribute Controlled
17 Substances, Money Laundering, and Conspiracy to Commit Money Laundering.

18 13. **Jaspal Singh**: Singh currently primarily manages the Great Bear and the Ramada
19 Limited. As stated above, he is a member of the companies that own the Travelers
20 Choice, Great Bear, and Ramada Limited. While the Certificate of Formation lists
21 Kuldip Puar² as the sole governing member of Jaspal & Puar, LLC, Singh and Kuldip
22 Puar, as members of the LLC, signed the Deed of Trust for the purchase of the Boulevard
23 in 2003, on behalf of Jaspal & Puar, LLC.

24 14. There is probable cause to believe that Singh has committed the crimes of
25 Conspiracy to Maintain a Drug Involved Premises, Maintaining a Drug Involved
26

27 ¹ The Ramada Limited should not be confused with the Ramada Tukwila, which is located on the West Valley
28 Highway.

² Based on immigration documents, I believe Kuldip Puar is the father of Lakhvir Pawar, mentioned herein.

1 Premises, Distribution of Controlled Substances, Conspiracy to Distribute Controlled
2 Substances, Money Laundering, and Conspiracy to Commit Money Laundering.

3 15. **Lakhvir “Larry” Pawar**: A review of documents filed with various Washington
4 State agencies shows that Pawar is also known as Lakhvir Singh Pawar and Lakhvir
5 Singh. Pawar currently manages the Boulevard. “Lakhvir Singh” is the registered agent
6 on behalf of Jaspal & Puar, the LLC that owns the Boulevard. There is probable cause to
7 believe that Pawar has committed the crimes of Conspiracy to Maintain a Drug Involved
8 Premises, Maintaining a Drug Involved Premises, Distribution of Controlled Substances,
9 Conspiracy to Distribute Controlled Substances, Money Laundering, and Conspiracy to
10 Commit Money Laundering.

11 16. At this stage, I am not certain as to the exact familial relationships among the
12 Target Owners. However, through surveillance I have confirmed that Saroya and Singh
13 live in the same house, located at 3754 South 175th Street, SeaTac, Washington 98188.
14 Immigration documents indicate that Saroya and Singh are brothers.

15 **THE CRIMES**

16 17. This search warrant affidavit outlines probable cause to believe that certain crimes
17 are being committed by the Target Owners. Those crimes, and the elements of those
18 crimes, are as follows:

19 **Maintaining a Drug Involved Premises and Conspiracy to Maintain a Drug** 20 **Involved Premises**

21 Title 21, United States Code, Section 856(a) reads:

22 Except as authorized by this subchapter, it shall be unlawful to –

23 (1) knowingly open, lease, rent, use or maintain any place, whether
24 permanently or temporarily, for the purpose of manufacturing,
25 distributing, or using any controlled substance;

26 (2) manage or control any place, whether permanently or temporarily, either
27 as an owner, lessee, agent, employee, occupant, or mortgagee, and
28 knowingly and intentionally rent, lease, profit from, or make available

1 for use, with or without compensation, the place for the purpose of
2 unlawfully manufacturing, storing, distributing, or using a controlled
3 substance.

4 **Distribution of Controlled Substances, Aiding and Abetting, and Conspiracy to**
5 **Distribute Controlled Substances**

6 Title 21, United States Code, Section 841(a)(1) reads:

7 Except as authorized by this subchapter, it shall be unlawful for any person
8 knowingly or intentionally –

9 (1) to manufacture, distribute, or dispense, or possess with intent to
10 manufacture, distribute, or dispense, a controlled substance[.]

11 Title 18, United States Code, Section 2(b) reads:

12 Whoever willfully causes an act to be done which if directly performed by him or
13 another would be an offense against the United States, is punishable as a principal.

14 Title 21, United States Code, Section 846 reads:

15 Any person who attempts or conspires to commit any offense defined in this
16 subchapter shall be subject to the same penalties as those prescribed for the offense, the
17 commission of which was the object of the attempt or conspiracy.

18 **Money Laundering and Conspiracy to Commit Money Laundering**

19 Title 18, United States Code, Section 1956(a)(1) reads:

20 Whoever, knowing that the property involved in a financial transaction represents
21 the proceeds of some form of unlawful activity, conducts or attempts to conduct such a
22 financial transaction which in fact involves the proceeds of specified unlawful activity --

23 (A)(i) with the intent to promote the carrying on of specified unlawful
24 activity;

25 . . .

26 (B) knowing that the transaction is designed in whole or in part –

27 (i) to conceal or disguise the nature, the location, the source, the
28 ownership, or the control of the proceeds of specified unlawful activity;

1 . . .

2 shall be [punished].

3 Title 18, United States Code, Section 1956(h) reads:

4 Any person who conspires to commit any offense defined in this section . . . shall
5 be subject to the same penalties as those prescribed for the offense the commission of
6 which was the object of the conspiracy.

7 **THE LOCATIONS TO BE SEARCHED**

8 18. This search warrant affidavit outlines probable cause to believe that there is
9 evidence of any of the above-mentioned crimes at the following locations to be searched:

10 (1) All common areas of the Boulevard Motel, including, without limitation, the
11 office, lobby, hallways, closets, public restrooms, and storage buildings;

12 (2) All common areas of the Great Bear Motor Inn, including, without limitation,
13 the office, lobby, hallways, closets, public restrooms, and storage buildings;

14 (3) All common areas of the Travelers Choice Motel, including, without
15 limitation, the office, lobby, hallways, closets, public restrooms, and storage
16 buildings;

17 (4) The residence located at 3754 South 175th Street, Seatac, WA 98188;

18 (5) The residence located at 15025 8th Avenue South, Burien, WA 98148;

19 (6) Room 305 at the Great Bear Motor Inn;

20 (7) Room 207 at the Boulevard Motel; and

21 (8) The offices, lobby, and any underground/garage storage area at the Ramada
22 Limited.

23 The locations to be searched are hereinafter collectively referred to as the “Subject
24 Premises” and are more fully described in Attachment A. The evidence to be seized is
25 more fully described in Attachment B.³

26
27
28 ³ The exception to this is the Ramada Limited. The items to be searched for at the Ramada Limited are attached as Attachment C.

GENERAL BACKGROUND OF THE INVESTIGATION

19. While the investigation is ongoing, to date, the investigative effort in this case has had five components: (1) an assessment of the calls for service to the Target Motels; (2) a historical analysis of the crimes committed at the Target Motels and the steps taken by the City of Tukwila to mitigate the crime problem; (3) interviews of cooperating sources; (4) the utilization of confidential informants and undercover officers; and (5) a financial analysis of the Target Owners' and Target Motels' bank accounts. The former two components were employed in order to assess whether what appeared to be true anecdotally – that the Target Motels were centers of criminal activity – was in fact true. The latter three components were employed to corroborate what appeared to be true in the data, and to confirm suspicions that the Target Owners were involved in the continuing pattern of criminal activity.

PROBABLE CAUSE

20. I write this affidavit for the purpose of establishing probable cause to search the locations described in Attachment A. The information contained throughout this affidavit is either information that I personally know, or has been provided to me by other sources. I have not included in this affidavit all of the information I know about the investigation to date. Included in this affidavit are assessments I have made based on my training and experience.

Drug Related Crimes: Maintaining a Drug Involved Premises, Conspiracy, and Distribution

21. There is probable cause to believe that the Target Owners knowingly allow the Target Motels to be used for the purpose of using and distributing controlled substances, and that the Target Owners profit handsomely from this illegal activity.

1 **Evidence of the Target Owners' Knowledge**

2 **The Yearly Safety in Overnight Lodging Notices**

3 22. The City of Tukwila tracks crime data each year and sends notices in the summer
4 to all hotels and motels regarding their rates of calls for service. The hotels in the highest
5 category of calls for service receive notices that include the following:

- 6 - The high number of semi-annual calls for service per room.
- 7 - That this rate "is very high, and [TPD is] concerned about the safety of [the
8 motel's] guests."
- 9 - That TPD's Crime Prevention Unit works with business owners to help identify
10 causes of crime at their businesses and to help find ways to reduce and prevent crime.
- 11 - That properties must pass a mandatory safety assessment prior to renewal of the
12 property's business license.

13 23. The safety inspection addressed in the letter must be completed prior to the
14 renewal of the motel's/hotel's business license, which usually occurs in January.
15 Community Policing Coordinator Chris Partman⁴ has advised the investigators in this
16 case that: (1) all three Target Owners have been less than cooperative; (2) despite these
17 repeated notifications none of the owners have ever sought out the City of Tukwila's
18 advice or assistance on how to remedy the crime problem at the Target Motels; and (3) all
19 three Target Owners have, to some degree, argued and complained to her about the City
20 of Tukwila's use of the calls for service as a measure of the Target Motels' problems.
21 Ms. Partman reports that the Target Owners have repeatedly ignored the notices and only
22 contacted the City of Tukwila in December, when it was time for the business licenses to
23 be renewed.

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⁴ Ms. Partman has held this position for three years.
AFFIDAVIT OF JOEL E. MILLER, JR. - 9

1 Chronic Nuisance Ordinance Notifications

2 24. On November 9, 2011, the City of Tukwila sent letters to Saroya, as owner of the
3 Travelers Choice and Takhvir Singh,⁵ as owner of the Boulevard. The letters notified
4 them that the City had passed a Chronic Nuisance Ordinance, and stated that, based on
5 the large number of calls for police service under the Safety and Overnight Lodging
6 Ordinance, there was a possibility that the properties would qualify as Chronic Nuisance
7 properties. The letters indicated, "It is our hope that this information will give you the
8 opportunity to assess your business practices and implement any changes in a pro-active
9 manner without City of Tukwila intervention." Ms. Partman's contact information was
10 listed in the letters, with an invitation to call her with any questions.

11 25. When Ms. Partman inspected the Travelers Choice in 2011, Saroya became angry
12 with Ms. Partman, and yelled at her about the calls for service calculation. Saroya
13 accused the police department of listing calls for service for the Travelers Choice that in
14 fact were calls for service for locations outside the motel property, such as on the street.
15 While yelling at Ms. Partman, Saroya approached her in an aggressive manner, causing
16 the police officer who was with her to intervene. Ms. Partman reports that this was the
17 first time she felt threatened while serving as the Community Policing Coordinator.

18 26. In August 2012, the City of Tukwila sent a Chronic Nuisance Violation Notice to
19 R.M., the then-owner of the Great Bear. The Violation Notice declared the Great Bear to
20 be a chronic nuisance property, and gave examples of 10 incidents that occurred during
21 the prior 12 months, including assaults, a shooting, and numerous drug-related events.
22 On September 5, 2012, the City of Tukwila issued a Chronic Nuisance Notice and Order
23 to R.M., which included a list of mandatory conditions that the Great Bear had to meet in
24 order to avoid penalties such as fines and possible abatement. The first condition read,
25 "there will be no cash transactions of any amount allowed on the property." Shortly
26 thereafter, Singh and Saroya began managing the Great Bear.

27 _____
28 ⁵ Based on immigration documents, Takhvir Singh is the brother of Lakhvir Pawar and the son of Kuldip Puar.

1 27. In the fall of 2012, Ms. Partman met with Singh regarding the Chronic Nuisance
2 Ordinance at the Great Bear. Singh told Ms. Partman that he was very upset about the
3 limitation on the cash transactions. He complained that the police department was not
4 doing enough to reduce the illegal activity at the Great Bear. Ms. Partman told Singh that
5 drug dealers and prostitutes deal in cash, and that refusing to accept cash would reduce
6 the amount of problems happening at the Great Bear. Singh had no response.

7 28. On September 19, 2012, Pawar met with Ms. Partman, and complained about the
8 calls for service calculation at the Boulevard. Pawar initially indicated that he would try
9 to handle the problem, but then stated that it was useless. He then blamed the “other
10 hotels” next to the Boulevard for the high calls for service.

11 29. On September 27, 2012, Ms. Partman and a member of TPD met with Pawar,
12 Singh, Saroya, and three other motel owners or their representatives. The meeting was
13 scheduled at the owners’ request. All of the owners and representatives indicated that not
14 being able to accept cash payments would ruin their businesses. During this meeting,
15 Singh and Saroya advised Ms. Partman that they had purchased the Great Bear and
16 intended to run it. Ms. Partman told them that the Chronic Nuisance Violation and Order
17 for the Great Bear would still be in effect, despite the change in ownership. The owners
18 and representatives discussed jointly paying for a security guard or service to patrol their
19 properties during the evenings, but later reported that this was too costly. All of them
20 also blamed the neighborhood around their hotels and the City of Tukwila for the crime
21 problems on their properties.

22 30. On January 4, 2013, the City of Tukwila and N K Saroya, LLC (Saroya and Singh
23 as members), entered into a Voluntary Correction and Limited Right of Entry Agreement
24 concerning the Chronic Nuisance Ordinance. In the agreement, Saroya and Singh both
25 agreed that the Great Bear constituted a Chronic Nuisance Property. Saroya and Singh
26 did not agree to the condition related to prohibiting cash payments.

27 31. On July 18, 2013, Pawar met with Ms. Partman, after he requested the meeting to
28 evaluate the statistics generated annually for the Safety in Overnight Lodging Ordinance.

1 At that point, the Boulevard had the highest calls for service of any hotel in Tukwila,
2 despite having the fewest rooms of all of the Tukwila hotels. Between July 1, 2012 and
3 June 13, 2013, the Boulevard had 223 calls for service. Pawar wanted some of the calls
4 removed from the data, because it was he or his employees who made the calls to the
5 police. However, due to the large volume of calls at the property, the remaining numbers
6 were still high.

7 32. Pawar also blamed many of the calls for service on a domestic violence situation
8 between one of his employees and the employee's wife. According to Pawar, the wife is
9 a crack cocaine user and causes problems at the Boulevard. However, Pawar refused to
10 take any action either against the employee or the employee's wife.

11 33. Pawar told Ms. Partman that he was trying to clean up the Boulevard, citing to the
12 fact that he has had problems with Asian guests, and that he now does not rent to Asians,
13 because "they do too much criminal activity." When offered suggestions on how to
14 upgrade the property, Pawar rejected all of the suggestions, such as erecting a gate,
15 prohibiting smoking in the rooms, and addressing the matter of the employee's wife. At
16 the end of the meeting, he asked for ideas for him to implement, and Ms. Partman agreed
17 to offer additional ideas and to discuss them after the first week in August.

18 Other Evidence of the Target Owners' Knowledge

19 34. In addition to the yearly notices to all three Target Motels and the Chronic
20 Nuisance Ordinance for the Great Bear, there have been numerous incidents that
21 demonstrate the Target Owners' awareness that the Target Motels are being used to sell
22 and use drugs.

23 Dead Bodies

24 35. Between 2009 and 2013, at least three dead bodies were found in the Travelers
25 Choice, with either toxicological evidence of drug use, or physical evidence of drug use
26 (e.g., syringes found in the motel room). During that time frame, at least two dead bodies
27 were found at the Boulevard.
28

1 36. The most recent dead body was found on August 1, 2013, at the Travelers Choice.
 2 When the body was found, law enforcement also discovered evidence of drug use in the
 3 motel room, such as a pipe for smoking drugs and the cap of a syringe. This dead body
 4 was found less than a week after Saroya, as more fully described below, facilitated a drug
 5 deal at the Travelers Choice.

6 Trespass Incidents

7 37. The investigation revealed that individuals who are trespassed⁶ from the Target
 8 Motels are allowed to return either to the same Target Motel, sometimes at a higher rate,
 9 or simply relocate to another Target Motel.

10 Other Incidents

11 38. On February 22, 2013, an on-duty patrol officer saw R.G., a person he knew to be
 12 on Washington State Department of Corrections Supervision, enter the Boulevard. The
 13 officer entered the motel office and spoke with desk clerk A.S. The officer asked A.S.
 14 whom R.G. was visiting. A.S. advised that R.G. was staying at the motel with his wife.
 15 A.S. also reported that J.B. and J.B.'s wife were also staying at the motel. The officer
 16 knew that J.B. had been involved with narcotics at the Boulevard in 2010, and asked A.S.
 17 why J.B. was allowed to stay in the motel after the trouble he had caused in the past.
 18 A.S. responded that it was the owners' decision who stayed at the motel.

19 Saroya's Admission of Illegal Activity at the Travelers Choice

20 39. On October 9, 2010, S.T. went to the Travelers Choice. She later reported to
 21 police that the purpose of her visit was to purchase crack cocaine from "Ty Nguyen,"
 22 later identified as Thai Van Thanh, located in Room 107. In the parking lot, before
 23 reaching Room 107, S.T. ran into Saroya, to whom she tried to pay a \$10 entrance fee.⁷
 24 According to S.T., Saroya demanded \$20 and "full sex" from her. When she refused,
 25

26 ⁶ A trespass notice provides a warning to an individual that they are not allowed back on a particular property for
 27 one calendar year, and that, if they do so, they may be subject to criminal prosecution. A law enforcement officer
 issues the notice, but the property's management or ownership must request the trespass.

28 ⁷ As more fully described below, visitors at the Target Motels are required to pay between a \$5 and \$10 to enter the
 property.

1 Saroya ordered her to leave the property. When S.T. did not leave, he started to push her
2 and repeatedly struck her in the head with a long cylindrical object. When police asked
3 Saroya what happened, he initially lied and said that he had hit S.T. with a phone only
4 after she hit him in the face. Saroya later admitted that this was not accurate. After
5 waiving his *Miranda* rights, Saroya confessed that he knew that Thanh was pimping out
6 prostitutes and selling drugs out of the Travelers Choice. When asked why he had not
7 evicted Thanh, Saroya commented, “normal people will not come to [his] hotel so [he
8 has] to do business with crack heads and prostitutes to make money.”

9 40. During the interview, Saroya admitted to charging people \$10 to come onto the
10 property, and said that the Great Bear and Boulevard do the same thing. In response to
11 an officer’s question as to why he did not call the police to have S.T. trespassed, Saroya
12 said that the city punishes motel owners if too many 911 calls from the motels, so he does
13 not call 911, and chooses to handle situations as they arise, in order to keep police contact
14 to a minimum.

15 41. On October 12, 2010, S.T. contacted TPD and reported that she had run into
16 Saroya, who offered to pay her \$200, and then \$400, for her agreement not to cooperate
17 with authorities and not to testify. S.T. declined and told Saroya she planned on
18 testifying against him.

19 42. On October 27, 2010, S.T. told TPD that a few days before, she had met with
20 Saroya and Thanh in Thanh’s room at the Travelers Choice (Room 107). S.T. reported
21 that Saroya and Thanh had drafted a letter recanting her description of the assault, and
22 told her to re-write the letter in her own handwriting, threatening to beat her if she
23 refused. In the letter, S.T. was forced to write that she would not testify in the assault
24 case, that she was on drugs at the time of the incident, and that she had lied to the police.
25 S.T. signed the letter with a fake name.⁸

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28 ⁸ Saroya was charged with crimes related to the felony assault and witness tampering, and pleaded guilty to Assault
in the Fourth Degree and Obstructing Law Enforcement.
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1 43. Within a month after the assault on S.T., TPD utilized S.T. and another person to
2 purchase crack cocaine from Thai Van Thanh, who was still located in Room 107 of the
3 Travelers Choice.

4 **The Historical Analysis**

5 44. Both law enforcement and cooperating sources report that it would be impossible
6 for the Target Owners, each of whom work at the Target Motels, to not be aware of the
7 criminal activity taking place there. A historical review of TPD records reveals that the
8 Target Motels are centers of extensive drug, prostitution, and violent crime activity.⁹

9 45. Drug distribution and use at the Target Motels over the past three a half years has
10 been rampant. There have been 43 drug related incidents involving the police at the
11 Target Motels from 2009 through August 15, 2013.¹⁰ In that time frame, there have been
12 at least 6 drug incidents at the Travelers Choice, 3 at the Great Bear, and 33 at the
13 Boulevard. The majority of these events involve the distribution and use of crack
14 cocaine, but the use of other illegal drugs at the Target Motels is also abundant. For
15 example, the police have seized over 91.11 grams of crack cocaine, 11 grams of
16 methamphetamine, and 58 tablets of Oxycontin from the Target Motels over this period.
17 Most of these drugs are distributed or kept for personal use in small quantities because
18 users can only afford to purchase limited amounts in any given transaction: half a gram of
19 crack cocaine costs more than \$40. In the same time frame, there have been three non-
20 fatal drug overdoses discovered by the police at the Boulevard.

21 46. In my training and experience, I have observed that violent crime and prostitution
22 often occur in areas of high drug distribution and use. Between 2009 through August 15,
23 2013,¹¹ both violent crime and prostitution have occurred at the three Target Motels. For
24 example, there have been 44 assaults (27 at the Boulevard, 15 at the Travelers Choice,
25

26 ⁹ Confidential sources report that there is an abundance of unreported crime, and that both Saroya and Pawar have
27 told sources about the need to hide from the police when the police were looking for them.

28 ¹⁰ I have only included the incidents at the Great Bear from September 2012 to August 15, 2013, as Saroya and
Singh began managing the Great Bear in September 2012.

¹¹ I have only included the incidents at the Great Bear from September 2012 to August 15, 2013.

1 and 2 at the Great Bear), 6 rapes (1 at the Boulevard, 3 at the Travelers Choice, and 2 at
2 the Great Bear), and 13 robberies (11 at the Boulevard, 1 at the Travelers Choice, and 1 at
3 the Great Bear) along with other illegal activity. In addition to this violent crime, there
4 have been numerous arrests for prostitution, including at least 9 arrests resulting from
5 individuals violating their Stay Out of Area of Prostitution (SOAP) orders.

6 **The Confidential Sources**

7 47. To learn more about the problem of crime at the Target Motels, several
8 confidential sources have been utilized in this investigation. Examples of what the
9 sources have said are outlined below. The confidential sources have independently
10 reported that the Target Owners knowingly allow and facilitate the illegal activity taking
11 place in the Target Motels, and that the Target Owners obtain significant benefit from the
12 activity. With perhaps a few exceptions, the confidential sources report that no ordinary
13 Sea-Tac International Airport traveler stays at the Target Motels, and, as one confidential
14 source stated, she “felt sorry” for a couple who happened to stay at one of the Target
15 Motels, unaware of the activity that takes place there prior to their arrival.

16 48. The advertised nightly rate at the Target Motels is relatively low (between
17 approximately \$40 to \$60 per night). According to most of the confidential sources,
18 when a drug dealer or prostitute rents a room at a Target Motel, they are initially charged
19 the advertised rate. However, each of the Target Motels charges a \$5.00 to \$10.00
20 “entrance fee” to non-renting motel visitors.¹² The non-renting visitor typically pays the
21 entrance fee in cash either to the Target Owners or to the staff of the Target Motels.
22 After the non-renting visitor pays the fee, he or she may go to a particular room without
23 inquiring anything of the Target Owners or staff. Oftentimes, however, the non-renting
24 visitor may ask either where a particular renter is, or may ask where he/she can find
25 either drugs or a prostitute. The Target Owners or staff will often respond by directing
26 the renting visitor to a particular room, or by calling a particular room to advise that

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28 ¹² Based on the covert operations that have been utilized by TPD both prior to and during this investigation, it
appears the entrance fee has been \$10.00 since approximately 2009.

1 someone is looking for the drug dealer or prostitute. As a result, the Target Owners are
2 familiar with how much foot traffic visits any particular room. A number of the
3 confidential sources have advised that the Target Owner or staff would later tell the renter
4 that they owe additional money, based on the number of customers who visited their
5 rooms.¹³ The four confidential sources discussed below paid between \$90 and \$500 per
6 day to stay at the Target Motels. All four likely were using drugs during the time that
7 they stayed at the Target Motels.

8 CS-1¹⁴

9 49. CS-1 lived in Tukwila at various motels on Tukwila International Boulevard from
10 2003 or 2004 through 2011. CS-1 stayed at all three Target Motels.¹⁵ In an interview
11 with CS-1 on May 17, 2013, CS-1 admitted that CS-1 dealt drugs and acted as a
12 prostitute out of the Target Motels. According to CS-1, Pawar and Saroya knew CS-1
13 was dealing drugs and prostituting out of the Boulevard and Travelers Choice
14 respectively, and they directed customers to CS-1's room to buy drugs and to purchase
15 sexual acts. CS-1 told law enforcement that Pawar and Saroya charged CS-1 extra rent –
16 typically \$80 to \$100 cash per night, or nearly double the normal room rate – because
17 CS-1 was engaged in illegal activity. CS-1 reported that Pawar and Saroya told her they
18 would call the police about her if she did not pay the increased rate. CS-1 said that Pawar
19 and Saroya charged extra rent to: (1) individuals they did not like; (2) individuals who
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22 ¹³ Other confidential sources have reported that the Target Owners do not require them to pay extra money based on
23 foot traffic, but rather that the sources paid the entrance fees for all of their customers.

24 ¹⁴ CS-1 has a criminal history, including a 2012 felony conviction for Possession of Stolen Property in the Second
25 Degree, a 2012 gross misdemeanor conviction for Criminal Trespass, a 2007 misdemeanor conviction for possession
26 of Drug Paraphernalia, and a 2007 conviction for Prostitution. After she was arrested for delivering .67 grams of
27 crack cocaine, CS-1 began acting as a confidential informant for TPD in August 2011. As a result of her work as a
28 confidential informant, no charges were filed. In addition, TPD has paid CS-1 cash for information relating to
criminal activity in Tukwila and elsewhere. To date, TPD has paid CS-1 \$1,050 for information. CS-1 has also
participated in purchases of controlled substances at TPD's direction. Since the beginning of this investigation,
CS-1 had advised investigators in this case that she had "left the [criminal] lifestyle," and that her current boyfriend
was not a criminal. However, on August 23, 2013, the house that CS-1 shares with her boyfriend was searched and
a distribution amount of drugs was recovered.

¹⁵ CS-1 stayed at the Great Bear prior to the transfer of the property to the Target Owners.

1 had been previously trespassed from the property; or (3) individuals dealing drugs or
2 prostituting.

3 50. CS-1 paid the extra cash directly to Pawar and Saroya. CS-1 rarely received any
4 written receipt for payment. In the few instances where CS-1 did get a receipt, the receipt
5 listed the normal room rate, and did not include the extra cash CS-1 paid. According to
6 CS-1, CS-1 stayed at one motel until the owner or manager told CS-1 it was time to leave
7 because the police were watching CS-1's activities.

8 CS-2¹⁶

9 51. CS-2 is another individual who lived in the Target Motels, and prostituted herself
10 out of the Target Motels. At the time of her interview in October 2012, CS-2 lived in the
11 Great Bear, which was being run by Saroya. CS-2 told law enforcement that Saroya was
12 an "extortionist" who was currently charging CS-2 \$175 per night. CS-2 said that Saroya
13 had charged her as much as \$200 per night to stay at the Target Motels, depending on the
14 number of visitors to her room. According to CS-2, this amount was always paid in cash.
15 If CS-2 refused to pay the extra money, Saroya took CS-2's personal items -- including
16 clothes -- out of CS-2's room and held them until CS-2 paid off her debt. According to
17 CS-2, Saroya is a "millionaire" who got his money "from us" (meaning the prostitutes
18 and drug dealers staying at the Target Motels).

19 52. CS-2 said that Pawar also charged more from prostitutes because they were
20 generating more cash. CS-2 said CS-2 owed Pawar approximately \$150, and that like
21 Saroya, Pawar seized CS-2's personal items and held onto them until CS-2 paid. CS-2
22 said Pawar eventually threw out CS-2's belongings when CS-2 did not pay him. CS-2
23 said Pawar kept track of how much money CS-2 owed him on a piece of scrap paper with
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26 ¹⁶ CS-2 has a criminal history, including a 2011 felony conviction for Possession of a Controlled Substance, and two
27 misdemeanor convictions for Driving without a License (2011) and Prostitution (2010). In July 2012, CS-2 was
28 arrested for Prostitution in the area of the Target Motels. As a result of her arrest, she began providing information
to TPD, and as a result, no charges were filed.

1 her name and her room number on it. When asked if Pawar sent “tricks” to CS-2’s room,
2 CS-2 replied, “They all do.”

3 CS-3¹⁷

4 53. CS-3 is another individual who lived in various motels on Tukwila International
5 Boulevard while working as a prostitute. CS-3 stayed most frequently at the Great Bear.
6 At the time of her interview in January 2013, CS-3 said she last stayed at the Great Bear
7 two months prior, in approximately November 2012. According to CS-3, the owners of
8 the Target Motels knowingly allow criminal activity, including prostitution, at the
9 properties in exchange for higher rent. CS-3 referred to this as a “tax.” When discussing
10 the Great Bear, CS-3 said the total rent was frequently up to \$80 a night, nearly double
11 the normal room rate.

12 54. CS-3 reported that the people in the office of the Target Motels know about the
13 illegal activity, and they help by directing “johns” to the rooms because they are profiting
14 from it. When asked if Saroya “taxed” people staying at the Great Bear and Travelers
15 Choice, CS-3 responded, “All of them do that. All of them.” CS-3 then stated that the
16 owners of all three Target Motels (and other motels in Tukwila) knowingly allow illegal
17 activities, but do not care because they are profiting from the activity. However, when
18 asked about an “Indian” man at the Boulevard (meaning Pawar), CS-3 said that while he
19 worked at the Boulevard, he was not involved in the criminal activity.

20 55. When asked if CS-3 had ever paid a visitor’s fee, CS-3 replied, “Everyone does.”
21 CS-3 said that the Target Motels never gave receipts for payment of visitor fees. If a
22 receipt was given for room rent, the receipt would reflect the normal price for the room,
23 but not the extra cash paid for rent.

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27 ¹⁷ CS-3 has no criminal history. In January 2013, CS-3 was arrested for possession of .66 grams of crack cocaine
28 and possessing a stolen vehicle in Tukwila. Immediately after her arrest, she provided the information set forth in
this affidavit.

1 CS-4¹⁸

2 56. On August 16, 2013, CS-4 reported that she stayed at the Travelers Choice from
3 the summer of 2006 until October 2006, where she worked as a prostitute. Saroya was
4 managing the Travelers Choice at the time, and Saroya charged her after every “trick.” At
5 times, she turned up to 40 tricks per day, earning up to \$3,000 per day. On those days,
6 she paid Saroya up to \$500. CS-4 reported that Saroya either put the cash she paid him in
7 the till, or in his pocket. When she paid the managers cash, they put the cash in the till.
8 Saroya charged her more money if her customers appeared to have more money, based
9 upon their appearance or their vehicles. When she questioned Saroya as to why she had
10 to pay him extra, he said, “when you do business in my business, you have to pay.” In
11 addition to reporting her own activities, CS-4 stated that, while she was at the Travelers
12 Choice, she observed other drug dealers and prostitutes paying Saroya for allowing them
13 to engage in the illegal activity.

14 57. The confidential sources reported that their payments to Saroya and Pawar for
15 their rooms were primarily in cash, and that all of the entrance fees are paid in cash.

16 **The Target Owners’ Participation in Drug Activity**

17 58. In an effort to corroborate the information provided to us by the confidential
18 sources, ATF and TPD utilized a confidential informant (“the informant”) and
19 undercover officers (“UCs”) to purchase drugs from the Target Motels. The controlled
20 purchases and attempted purchases show that, not only are the Target Owners knowingly
21 allowing drug trafficking activity to flourish at the Target Motels, they aid and abet the
22 activity, and are engaged in conspiracies to distribute drugs. For all transactions, the
23 informant was searched before and after the operation, with negative results for drugs and
24 other contraband, other than what was purchased. All transactions were subject to audio
25 and/or video recording. A majority of the transactions took place after the various
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28 ¹⁸ CS-4’s criminal history includes a 2007 felony conviction for Trafficking in Stolen Property. She is being paid for her information. To date, she has received \$300 for her cooperation in this matter.

1 meetings with Ms. Partman discussed above, and after the issuance of the notices
2 discussed above.

3 Transactions with Saroya at the Travelers Choice

4 59. On July 24, 2013, the informant,¹⁹ who was working for ATF and TPD,
5 approached Saroya, who was in the office of the Travelers Choice, and asked, "Who is
6 working?" Based on my training and experience, I know that "working" refers to dealing
7 drugs. Saroya initially said, "Nobody," but then asked the informant how much he²⁰
8 wanted to purchase. The informant responded, "\$100." Saroya told the informant to
9 wait. Saroya then was seen on surveillance contacting another individual, later identified
10 as Bruce Fuller, who emerged from one of the motel rooms and spoke with the informant.
11 Saroya told the informant that Fuller could be trusted, and told the informant to follow
12 Fuller to Room 118. The informant did so, and purchased .54 grams of suspected crack
13 cocaine from Fuller inside Room 118. The crack field-tested presumptive positive for
14 cocaine.

15 60. On July 26, 2013, the informant approached Pawar at the Boulevard, and asked
16 who was working. Pawar stated that "Ty," later identified as Thai Van Thanh, was not
17 there, nor was anyone else available. ATF and TPD then directed the informant to the
18 Travelers Choice to contact Saroya. When the informant contacted Saroya, Saroya
19 asked, "What's up?" The informant responded, "the same thing," referring to the same
20 sort of transaction the informant sought three days prior. This time, Saroya sent the
21 informant to Room 211 to meet with Fuller. During this transaction in Room 211, the
22 informant gave money to Fuller's girlfriend,²¹ a known prostitute, and Fuller handed the
23 informant .78 grams of suspected crack cocaine, which later field-tested presumptive
24 positive for cocaine.

25 _____
26 ¹⁹ The informant has no criminal history, and has been utilized in one past multi-defendant federal investigation with
27 success. To date in this investigation, he has been paid approximately \$3,700.

28 ²⁰ The pronoun "he" and its derivatives are used for ease of reading; the gender of the informant is deliberately kept
secret in this affidavit.

²¹ The girlfriend's telephone number was found by law enforcement on a slip of paper in the room at the Travelers
Choice when they recovered the dead body discussed above on August 1, 2013.

1 Transactions with Singh at the Great Bear

2 61. Law enforcement first approached Singh through the use of the informant, who
3 introduced an undercover officer (“UC-1”) to him as someone who had an Electronic
4 Benefits Transfer (EBT) card for sale or trade.²² On two occasions in the late spring and
5 early summer of 2013, Singh used the UC’s undercover EBT card to obtain coffee and
6 other products, paying the UC a percentage of the cost of the products. The UC had also
7 discussed selling cigarettes to Singh. During a meeting on June 6, 2013, however, the
8 UC and Singh talked about drug trafficking.

9 62. On June 6, 2013, after an unsuccessful attempt to purchase groceries for the
10 motels at a Costco through the use of an EBT card, the UC told Singh that she had a few
11 hundred dollars and was trying to get an “8-ball” or 1/8 of an ounce (3.5 grams) of
12 cocaine. Singh seemed hesitant, until the UC said that Singh was a businessman and that
13 Singh knew what the dudes in his hotel were doing. Singh agreed that he did know, and
14 said he could point her in the right direction, but that he wanted to talk about it in his car.
15 They got into Singh’s car, and Singh confirmed that the UC wanted an 8-ball of crack.
16 He then said, “Hold on, let me call someone.” Singh obtained his cellular telephone and
17 asked about the cigarettes she had previously mentioned she had for sale. The UC
18 explained that she was looking to trade them for dope, but that she would consider a cash
19 value of \$50.00 per carton. Singh then used his cellular telephone to call “Solo,” but
20 obtained his voicemail. He hung up the phone and asked the UC how much an 8-ball was
21 selling for, to which she replied, “\$250.00.” Singh then made a second phone call, and
22 when someone answered, he said, “305, please.” No one answered the phone after Singh
23 asked to be transferred to “305.”

24 63. After this, Singh asked the UC if she would be in the area for a while. When she
25 said she would be, he said, “Alright, let me work on this, and I’ll get somebody, I can
26 help you out on this.” The UC then got out of Singh’s car. Singh then called her back to
27

28 ²² EBT cards were formerly known as “food stamps.”
AFFIDAVIT OF JOEL E. MILLER, JR. - 22

1 the car and asked what brand of cigarettes she had. The UC said she had Marlboros, but
2 reiterated that she preferred to trade them for drugs. Singh then asked if they had a tax
3 stamp on them, and she said she was not sure, that she would check. Singh stated that if
4 they did not have a tax stamp, he may not be able to get rid of them.

5 64. On June 10, 2013, the UC called Singh, who asked the UC if she was interested in
6 the "stuff." The UC said she was and Singh said "the guy" had just walked past the
7 lobby, and that Singh would call him. Singh said he would call her back after talking to
8 "the guy." Singh did not call back.

9 65. On June 11, 2013, the UC was sent into the Great Bear to talk to Singh about
10 obtaining the 8-ball. The UC approached Singh in the lobby of the motel. The UC asked
11 Singh if he was able to talk to "the guy." Singh then made a call, and asked, "Is your
12 homie there?" and said, "Let me talk to him really quick." Singh then walked out of the
13 lobby and continued the conversation. He then returned to the lobby and motioned for
14 the UC to come out of the lobby with him. She walked out of the lobby and Singh told
15 her to go to Room 305. The UC asked for an introduction, and Singh said that he had
16 already done so, and told the guy that he was sending a buddy up.

17 66. The UC went to Room 305 and knocked on the door. There were three people in
18 the room – two women and a man, later identified as Maurice "Mo" Gardner. Gardner
19 wanted the UC to enter the room, and the UC refused. After a brief discussion, a female
20 in the room shut the door. The UC then returned back to the lobby and told Singh that
21 "the guy" did not want to do the deal, and that the UC did not feel comfortable going
22 inside the room. Singh told the UC to stay in the lobby. Surveillance officers saw Singh
23 then go up to Room 305 and speak outside the room with Gardner. After a brief
24 conversation, Singh returned to the lobby and told the UC that they wanted her to go into
25 the room. When the UC expressed her reluctance, Singh assured her she would be fine.
26 The UC then asked what the man's name was, and Singh said, "Mo." Singh offered to
27 wait there until she came back. The UC said she would go to the room if Singh went
28 with her, but Singh declined. Singh then changed the topic to cigarettes, and the UC gave

1 Singh a carton of cigarettes for trying to facilitate a crack deal. Singh inspected the
2 carton of cigarettes and commented that there was no tax stamp on them. The UC got
3 into her vehicle and Singh again told her that she could go to the room and that she would
4 be fine. The UC said she appreciated the help, but that she would not go into the room
5 alone, and Singh said he may be able to help her another time.

6 67. On July 30, 2013, the informant was utilized to conduct a buy-walk at the Great
7 Bear. The informant went to the lobby of the Great Bear, and spoke with Singh, asking
8 whether anyone was "working" that day. According to the informant, Singh responded
9 that the night manager was not going to start work for a little while. When the informant
10 said that he did not want to know who was working, but rather, who was *working*, Singh
11 responded, "Mo," and motioned upstairs. The informant then left the lobby and knocked
12 on the door to Room 305. Maurice "Mo" Gardner answered the door and let the
13 informant into the room. The informant told Gardner that he wanted \$100 worth of
14 crack. Gardner reached into a pocket of a hanging shirt and pulled out suspected crack.
15 He broke off a small chunk and removed a scale from the dresser drawer, weighed the
16 chunk and wrapped it in a separate baggie. Gardner then handed the informant the baggie
17 of what later field-tested presumptive positive for cocaine and weighed 1.2 grams,
18 without packaging. The informant paid Gardner and left.

19 Transactions with Pawar at the Boulevard

20 68. On September 14, 2012, the informant went to the Boulevard at the direction of
21 ATF and TPD. Once in the office, the informant asked Pawar who was working. Pawar
22 said that no one was. The informant then asked if "Co-Co" was there. Pawar said that he
23 had not seen her, but that her room was Room 112. According to the informant, the
24 informant started to leave the office, but Pawar stopped him, wanted the visitor's fee, and
25 the informant paid with a \$20 bill. Pawar put the \$20 bill in the register and gave the
26 informant \$10 in return.

1 69. The informant went to Room 112, and no one answered. The informant then went
2 back to the office and asked if a different individual was there. Pawar responded that the
3 other individual had just gone to bed. The informant then left the office.

4 70. Another operation was attempted later that same day. The informant went back to
5 the Boulevard and asked Pawar if "Co-Co" was awake and in her room. Pawar indicated
6 that she was. The informant then went to Room 112, and asked "Co-Co" if she had any
7 drugs. She said she did not. The informant then went to Room 106, and met with A.G.
8 The informant asked A.G. if she was "good" (meaning whether she had drugs for sale).
9 A.G. asked how much the informant wanted. The informant said that he wanted \$100
10 worth. A.G. then said that she had to go get it from another location.

11 71. Surveillance units watched A.G. leave the Boulevard. A.G. then returned to the
12 Boulevard, where, according to the informant, A.G. sold the CI crack cocaine. The crack
13 weighed .8 grams and field-tested presumptive positive for cocaine. The informant
14 indicated that, when he went to the office to find "Co-Co" during this second visit, the
15 informant started to pull out money for the visitor's fee, but Pawar waved the informant
16 on with a hand gesture, and the informant did not pay the visitor's fee.

17 72. On August 6, 2013, the informant contacted Pawar at the front office of the
18 Boulevard and asked Pawar who was "working." Pawar then took a telephone call. The
19 informant then paid the \$10 entrance fee. After getting off the phone, Pawar told the
20 informant, "207." The informant asked, "All the way at the end?" Pawar responded,
21 "Yes, 207." The informant then went to Room 207 and knocked on the door. No one
22 answered, but the informant heard what he thought was a woman's voice inside the room.
23 The informant inquired at the door, "Is Ty there?" There was no response. The
24 informant went back to the office and again contacted Pawar. The informant asked
25 Pawar to call the room, and Pawar said, "207?" The informant responded, "Yeah; I
26 knocked on the door and it sounded like a female was there." Pawar then called a
27 number, and asked, "Yeah, Ty?" A moment later, he said, "Is someone there; [the
28 informant] wants to talk to you." Pawar then said, "Ty is in the shower." The informant

1 waited, walked back to Room 207, knocked, and was allowed into the room. According
2 to the informant, Ty, later identified by law enforcement and the informant as Thai Van
3 Thanh,²³ was in the room. The informant showed Thanh the buy money. Thanh gave
4 the informant a few rocks of crack. The informant then paid Thanh \$100 in buy money
5 and returned to law enforcement. The rocks weighed 2.6 gross grams and field-tested
6 presumptive positive for cocaine.

7 73. On August 13, 2013, the informant was utilized to conduct a buy walk operation at
8 the Boulevard. The informant approached Pawar at the front office of the motel, and
9 asked Pawar who was “working.” A review of the audio recording reveals that Pawar
10 responded, “I don’t know and don’t ask me all the time.” After the informant paid Pawar
11 the entrance fee, the informant went to a room, knocked on the door, but no one
12 answered. The informant remarked to someone, “He’s all out.” At that point, both the
13 informant’s report of the incident and the audio recording reveal that J.D., also known as
14 “Puerto Rico,” approached the informant and told him that he can get the informant crack
15 cocaine, but it would take ten minutes. The informant waited for a while in Room 106 at
16 the Boulevard, where he had a conversation with “Puerto Rico” and A.G. During the
17 conversation, “Puerto Rico” left the room, as was witnessed by surveillance officers. The
18 informant asked A.G. if “Puerto Rico” went to get “it.” A.G. responded that she did not
19 know. The informant left the room at that point and returned to the office.

20 74. Once in the office again, Pawar asked the informant if “Puerto Rico” is coming
21 back. The informant told Pawar that he was waiting on “Puerto Rico” to do what he is
22 going to do. The informant and Pawar engaged in small talk for about ten minutes, after
23 which the informant left the office and went to Room 106. According to the informant,
24 he had asked Pawar if anyone else was working, and he responded, “Ashlie,” referring to
25 A.G. This question and answer are not heard on the audio recording.

26 _____
27 ²³ Thanh is the person S.T. was going to buy drugs from in Room 107 at the Travelers Choice in October 2010, prior
28 to Saroya’s assault of her. Thanh was with Saroya in Room 107 during the witness tampering incident. Thanh was
also the person who sold drugs to S.T. shortly after the witness tampering incident.

1 75. Once the informant was at Room 106, A.G. answered the door and told the
2 informant that she had called "Jake" to hook up the informant. When "Jake" showed up,
3 he pulled a baggie from his right front pants pocket and emptied some crack on a piece of
4 paper. The informant paid "Jake" for the crack. The informant met with law
5 enforcement and turned over the .8 grams of crack that field-tested presumptive positive
6 for cocaine. The informant later identified a photo of Jacob Day as "Jake."

7 Subsequent Transactions with Gardner in Room 305 at the Great Bear

8 76. On August 7, 2013, the informant went to the Great Bear at the direction of law
9 enforcement to conduct a controlled buy of drugs. He walked into the office of the Great
10 Bear and met with motel shift manager, R.M.M. The informant asked R.M.M. whether
11 "Mo" (Gardner) was in his room. R.M.M. said that he was, but first charged the
12 informant the \$10 visitor's fee.

13 77. The informant went to Room 305 at the Great Bear, and entered it. Once inside
14 the room, the informant asked Gardner if the "big package" was still available.²⁴ Gardner
15 told the informant that he only had \$100 worth at the moment, but if the informant could
16 return around five o'clock that afternoon, he could fulfill the informant's request for a
17 quarter ounce. Gardner's girlfriend weighed some crack cocaine before handing it to the
18 informant. The informant gave Gardner \$100 of buy money. The informant returned to
19 law enforcement with the crack, which field-tested presumptive positive for cocaine and
20 weighed 1.8 gross grams.

21 78. On August 9, 2013, the informant was working with law enforcement and
22 introduced an undercover officer (UC-2) to R.M.M. at the Great Bear. The informant and
23 UC-2 entered the reception area and encountered R.M.M., to whom they explained that
24 they were looking for "Mo." R.M.M. said that it would cost \$10. The UC paid R.M.M.
25 \$10. R.M.M. then motioned the UC and the informant to go up. The informant asked if
26 "Mo" was in Room 305, and R.M.M. confirmed that he was.

27
28 ²⁴ "The big package" refers to a discussion between the informant and Gardner that took place on August 1, 2013, when Gardner told the informant that he would have a lot of crack available for the informant if he wanted it.

1 79. The UC and the informant then went to Room 305, where they found a woman
2 knocking on the door to the room. Gardner answered the door and looked at everyone,
3 and allowed all of them in. Once inside, the UC saw a baseball bat against a wall
4 between the bed and the end table. On the end table was a white plate with a razor and
5 small pieces of crack on it next to a small scale. Gardner asked the UC what he wanted,
6 and the UC stated that he wanted "two." The woman who entered the room with the
7 informant and the UC stated that she needed five grams. The woman took what appeared
8 to the UC, based on his training and experience, to be five grams of what appeared to be
9 cocaine from Gardner and left, stating that she would be back with the money. Gardner
10 then placed an 8-ball of crack cocaine on the table for the UC. Gardner gave the UC a
11 plastic baggie and the UC placed the crack inside of it, tying the baggie shut. The UC
12 asked Gardner what the price was, and Gardner said \$200. The UC paid Gardner \$200,
13 and asked whether Gardner had any "crystal" (methamphetamine). Gardner said he did
14 not, but the two exchanged phone numbers, and the UC asked Gardner if he could contact
15 him directly; Gardner said he could. When the UC asked Gardner when he would be
16 available, Gardner represented that he was always there. The UC and the informant then
17 left the motel. The crack cocaine that the UC purchased field tested presumptive positive
18 for cocaine.

19 *Practices of Those Engaged in Narcotics-Related Activity*

20 80. Based upon my training, experience, and participation in these and other drug
21 trafficking investigations, and based upon my conversations with other experienced law
22 enforcement agents and officers, I know the following:

23 a. I have found that the distribution of illegal narcotics is frequently a
24 continuing activity lasting over months and years. Persons involved in the trafficking of
25 illegal controlled substances typically will obtain and distribute controlled substances on
26 a regular basis, much as a distributor of a legal commodity would purchase stock for sale.
27 Similarly, such drug traffickers will maintain an "inventory" which will fluctuate in size
28 depending upon the demand for and the available supply of the product. It has been my

1 experience that drug traffickers keep records of their illegal activities not only during the
2 period of their drug trafficking violations but also for a period of time extending beyond
3 the time during which the trafficker actually possesses/controls illegal controlled
4 substances. The records are kept in order to maintain contact with criminal associates for
5 future transactions and so that the trafficker can have records of prior transactions for
6 which the trafficker might still be owed money or might owe someone else money.
7 Dealers often keep these records in their homes and businesses.

8 b. It is common for drug dealers to conceal large quantities of currency,
9 foreign currency, financial instruments, precious metals, jewelry, and other items of value
10 which are proceeds from drug trafficking in their residences and businesses.

11 c. Evidence of excessive wealth beyond an individual's outward means
12 is probative evidence of the distribution of controlled substances. Therefore, receipts
13 showing the expenditure of large sums of money and/or the expensive assets are evidence
14 of drug trafficking. I also know that drug traffickers commonly keep the expensive assets
15 themselves and/or documentation of the purchase of the asset (receipts, warranty cards,
16 etc.) in their homes and businesses.

17 d. It is common for drug dealers to maintain equipment and supplies
18 (i.e., scales, packaging, masking agents) on hand over a lengthy period of time, even
19 when they do not have any controlled substances on hand. I also know that the
20 aforementioned items are frequently maintained in the dealers' homes and businesses.

21 e. Drug dealers often have some amount of inventory -- namely, illegal
22 drugs -- stored in their homes and businesses.

23 f. It is common for drug dealers to possess firearms and ammunition to
24 protect their drugs, assets, and persons from rival traffickers, other criminals, and from
25 law enforcement. Persons who purchase and possess firearms also tend to maintain the
26 firearms and ammunition for lengthy periods of time. Firearms can be acquired both
27 legally and unlawfully, without official/traceable documentation. Persons who acquire
28 firearms from Federal Firearms Licensees, through deliberate fraud and concealment,

1 often will also acquire firearms from private parties and other sources unknown to ATF.
2 Persons who, whether legally or illegally, purchase, possess, sell and/or transfer firearms
3 or ammunition commonly maintain the firearms or ammunition on their person, at their
4 residence or business, or in a motor vehicle which they own and/or operate. Firearms or
5 ammunition are often secreted at other locations within their residential curtilage, and the
6 identification of these firearms will assist in establishing their origin. Persons who
7 purchase, possess, sell and/or trade firearms or ammunition commonly maintain
8 documents and items that are related to the purchase, ownership, possession, sale and/or
9 transfer of firearms, ammunition, and/or firearm parts, including but not limited to
10 driver's licenses, telephone records, telephone bills, address and telephone books,
11 canceled checks, receipts, bank records and other financial documentation on the owner's
12 person, or at the owner's residence or businesses.

13 g. It is common for members of drug trafficking organizations, in an
14 attempt to disguise their identities and illegal activities, to use prepaid cellular telephones
15 and prepaid long distance calling cards. I know that often the only way to connect a
16 subject with a particular prepaid cellular telephone or calling card is to seize the phone or
17 calling card from the trafficker or his residence or businesses. I also know that the
18 aforementioned items are frequently maintained in the drug trafficker's residence and
19 businesses.

20 h. Narcotics traffickers often maintain books, records, receipts, notes,
21 ledgers, airline ticket receipts, vehicle rental records, credit card receipts, credit card
22 statements, hotel receipts, travel agency receipts, money orders and other items relating
23 to the transportation, ordering, sale and distribution of controlled substances which might
24 reflect foreign or domestic travel, which relate to the transportation, ordering, sale and
25 distribution of controlled substances, and subsequent use and concealment of income
26 derived from that activity.

Money Laundering and Conspiracy to Commit Money Laundering

81. As set forth more fully above, there is probable cause to believe that for years the Target Owners have knowingly maintained drug-involved premises at the Target Motels, and have generated significant cash proceeds from this illegal activity. A review of the Target Motels' business bank accounts and the personal bank accounts associated with the Target Owners show significant cash activity consistent with promotional and concealment money laundering.²⁵

82. A review of the Target Motels' bank accounts²⁶ shows that approximately 58 percent of the monthly deposits are in cash with the remainder primarily in credit card deposits. According to numerous confidential sources, including the confidential sources mentioned above, a vast majority of the rooms at the Target Motels are rented by drug dealers and prostitutes, and therefore, there is probable cause to believe that a significant portion of the cash deposits into the Target Motels' bank accounts is derived from the Target Owners' operation of a drug involved premises at the Target Motels. While I estimate that the illegal activity generates thousands of dollars per month in cash,²⁷ it appears that the Target Owners are only depositing enough cash into the Target Motels' bank accounts to cover the operating expenses of the Target Motels, including the mortgage payment, tax payments, and utilities. The use of these funds as mortgage payments may constitute promotional money laundering. Of note, the Target Motels' bank account records do not reveal significant payments (in cash or by wire or check) to the Target Owners as salary or operating profits.²⁸ Instead of depositing all of the

²⁵ "The Target Motels' bank accounts" refers to the business bank accounts belonging to the Travelers Choice Motel and the Boulevard Motel. I have not yet obtained the bank accounts for the Great Bear that pertain to the time frame when the Great Bear was owned by N K Saroya, LLC.

²⁶ Traveler's Choice Bank of America Account #xxx4318 and Boulevard Motel Bank of America Account #xxxx8507.

²⁷ I base this estimate on interviews conducted with confidential sources, and on the ATF financial auditors' investigation in this matter.

²⁸ Documents obtained from Washington State are consistent with this information. For example, Washington State Department of Social and Health Services ("DSHS") forms submitted by Gurdip Pawar between September 18, 2009 and August 11, 2011, related to food and medical assistance, indicated that Lakhvir Pawar was employed by the Boulevard and earned between \$1,700 and \$1,800 a month.

1 illegally derived cash into the Target Motels' business accounts and paying themselves
2 salaries or profits, it appears that the Target Owners are depositing a significant sum of
3 this cash into their personal bank accounts to conceal the illegal source of the cash.

4 83. For example, Pawar's Bank of America personal checking account (#xxxx1869)²⁹
5 revealed the following deposit activity:

Year	Total Deposits	Cash Deposited	Deposits from Boulevard Business Account	Cash As Percentage of Total Deposits
2008	\$79,545.29	\$53,842.00	\$14,649.94	68%
2009	\$57,264.53	\$33,015.34	\$16,013.19	58%
2010	\$85,329.64	\$65,688.00	\$10,500.00	77%
2011	\$69,989.35	\$51,318.00	\$8,400.00	73%
2012 ³⁰	\$62,302.58	\$44,880.50	\$3,600.00	72%

13 84. In addition to the cash deposits above, cash deposits were made to a Chase
14 WUTMA account (#xxxxxx1270) held for Pawar's child with Pawar the named
15 custodian. From May 16, 2011, to December 6, 2012, this account had 11 cash deposits
16 totaling \$15,190 with no other activity other than interest, leaving a balance of
17 \$15,191.73 as of December 6, 2012.

18 85. Similar to Pawar's account activity, deposits to Saroya's Bank of America
19 personal checking account (#xxxx8048) consisted mostly of cash deposits:

Year	Total Deposits	Cash Deposited	Cash As Percentage of Total Deposits
2008	\$64,846.43	\$52,600.00	81%
2009	\$50,247.80	\$42,335.50	84%
2010	\$46,357.04 ³¹	\$28,666.00	62%
2011	\$39,566.00	\$33,500.00	84%
2012 ³²	\$42,180.55	\$42,100.00	99.8%

26
27 ²⁹ Prior to August 25, 2009, the account was #xxxx3564.

³⁰ Through December 24, 2012.

³¹ After removing a one-time deposit of \$23,578.10 from a title insurance company.

³² Through December 18, 2012

1 86. Singh's Wells Fargo personal checking account (#xxxx7732) also had significant
2 cash deposit activity:

Year	Total Deposits	Cash Deposited	Cash As Percentage of Total Deposits
2010	\$118,699.48	\$103,100	87%
2011	\$50,123.59	\$34,380	68%
2012 ³³	\$55,789.63 ³⁴	\$20,000	36%

3
4
5
6
7 Through the course of the investigation, I have yet to uncover a legitimate source for
8 these unexplained cash deposits.³⁵

9 87. The bank records reviewed reveal that the Target Owners are depositing cash into
10 their personal bank accounts to cover monthly personal expenses, such as mortgage
11 payments for residences, car payments, and personal utilities. For example, deposits to
12 Saroya's Chase checking account #xxxxx0717 in 2011 totaled \$18,550 with \$18,500
13 identified as cash deposits. Deposits in 2012³⁶ totaled \$20,346, consisting of \$16,100 in
14 cash plus a \$4,246 US Treasury refund. In both years, the majority of the deposits were
15 monthly cash deposits of \$1,500 followed by \$1,483.92 ACH payments to JP Morgan
16 Chase. These payments were for the mortgage on Saroya's residence located at 3754 S
17 175th St. in Seatac, Washington.

18 88. A Saroya checking account at Wells Fargo (#xxxxxxx7782) has similar activity.
19 Deposits in 2011 totaled \$28,400, all in cash. Deposits in 2012³⁷ totaled \$24,100, all cash
20 deposits. In both years, the majority of the deposits were monthly cash deposits of
21 \$2,400 followed by monthly debits of \$2324.94 (2011) and \$2314.37 (2012) to Wells
22 Fargo home mortgage for Saroya's rental property in Seatac, Washington.

23 89. In addition to depositing cash to meet the operating expenses of the business or
24 their personal expenses, the bank records reveal that the Target Owners likely use these
25

26 ³³ Through December 4, 2012

³⁴ This amount does not include a combined deposit of \$30,000.00 from the former owner of the Great Bear.

27 ³⁵ The investigation has revealed that Target Owners or individuals associated with the Target Owners may have
interest in two or three additional motels.

28 ³⁶ Through November 21, 2012

³⁷ Through December 4, 2012

1 bank accounts to launder the significant cash derived from the illegal activity. Deposits
 2 to the N.H. Saroya, LLC dba Ramada Limited Wells Fargo checking account
 3 (#xxxxxx3997) show a significant increase in cash deposit activity³⁸ in 2012, the year the
 4 Great Bear was purchased:

Year	Total Deposits	Cash Deposited	Cash As Percentage of Total Deposits
2010	\$521,832.95	\$48,254	9%
2011	\$630,355.08	\$72,855	12%
2012 ³⁹	\$742,763.36	\$185,464	25%

10 90. Cashier's checks were issued by the following banks to gather the money
 11 necessary for the down payment on the purchase of the Great Bear in late 2012:

Date	Remitter	Amount	Bank Issuing Check
9/18/12	Daler Singh	\$8,000.00	Bank of America
9/18/12	Jaspal Singh	\$14,000.00	Bank of America
9/18/12	Kulwinder Saroya	\$20,000.00	Bank of America
9/18/12	Paramjit Singh	\$20,000.00	Bank of America
9/18/12	Kulwinder Saroya	\$40,000.00	Chase Bank
9/18/12	Jaspal Singh	\$4,500.00	US Bank
9/18/12	Daler Singh	\$7,000.00	US Bank
9/18/12	Kulwinder Saroya	\$41,000.00	US Bank
9/18/12	Kulwinder Saroya	\$12,000.00	Wells Fargo
9/18/12	Jaspal Singh	\$24,000.00	Wells Fargo
9/19/12	Kulwinder Saroya	\$9,000.00	Bank of America
9/19/12	Bhupinder Singh	\$9,000.00	Bank of America
9/19/12	Jaspal Singh	\$9,000.00	Bank of America
9/19/12	M Jaspa Company	\$9,000.00	Bank of America
9/19/12	Kulwinder Saroya	\$9,000.00	Chase Bank
9/19/12	Daler Singh	\$9,000.00	US Bank
9/19/12	Unknown party	\$9,000.00	Wells Fargo Bank
9/19/12	Unknown party	\$17,000.00	Wells Fargo Bank
9/19/12	Unknown party	\$30,000.00	Wells Fargo Bank

27
 28 ³⁸ Confidential sources report that the Ramada Limited does not generally accept cash as payment for rooms.

³⁹ Through December 4, 2012

1	11/29/12	Ramada Ltd	\$65,000.00	Wells Fargo Bank
2	11/30/12	Traveler's Choice Motel	\$35,000.00	Bank of America
3	11/30/12	Jaspal Singh	\$20,732.71	Bank of America
4	12/01/12	Jaspal Singh	\$30,000.00	Wells Fargo Bank
5		Total	\$451,232.71	

6 91. A review of the deposits made to the Ramada Wells Fargo bank account indicate
7 the following cash deposits were made during the approximate two week period prior to
8 the withdrawal of \$65,000 on November 29, 2012, for the issuance of the \$65,000
9 cashier's check remitted by Ramada Limited:

	Date	Deposit Amount	Cash
11	11/13/12	\$ 9,000.00	\$9,000
12	11/20/12	\$10,018.49	\$9,908
13	11/26/12	\$ 9,000.00	\$9,000
14	11/28/12	\$40,000.00	\$40,000
15	Totals	\$68,018.49	\$67,908

16 92. In several other instances, large amounts of cash were deposited to bank accounts
17 controlled by the Target Owners to enable the purchase of the cashier's checks used for
18 the down payment on the Great Bear. For example, on November 23, 2011, Singh's
19 Bank of America checking account (#xxxx5314) had an \$80.30 balance with no further
20 activity until November 5, 2012, when \$8,010 in cash was deposited. On November 13,
21 2012, there was a \$7,000 cash deposit. On November 30, 2012, \$5,800 in cash was
22 deposited and \$20,732.71 was withdrawn for a cashier's check used as part of the down
23 payment on the Great Bear.

24 93. Another example concerns the two \$9,000 Bank of America cashier's checks
25 dated September 19, 2012, remitted by Kulwinder Saroya and M Jaspa Company, LLC,
26 respectively. A review of the Bank of America account records belonging to Saroya
27 (#xxxx8048) and M Jaspa Company, LLC (#xxxx4318) indicates that on September 19,
28 2012, \$9,000 in cash was deposited into the M Jaspa Company, LLC (Travelers Choice)

1 account at 10:55 am and an additional \$9,000 in cash was deposited into Saroya's
2 account at 10:57 am. Both deposits were made at the Bank of America Seatac Banking
3 Center. At 11:03 am, two consecutively numbered cashier's checks were purchased,
4 each in the amount of \$9,000, payable to an attorney acting as the escrow agent for the
5 Great Bear purchase using \$9,000 withdrawals for official checks out of the respective
6 accounts.

7 94. There is probable cause to believe that documents and records relating to the
8 money laundering scheme described herein will be found at the Subject Premises. The
9 investigation has revealed that Target Motels' bank account records are sent to the Target
10 Motels and that certain personal bank account records associated with the Target Owners
11 are sent to the Target Owners' personal residences. The Ramada Limited bank account
12 records are sent to the Ramada Limited. Accordingly, there is probable cause to believe
13 that financial documents relating to the Target Owners' money laundering will be found
14 at the Subject Premises.

15 *Practices of Those Engaged in Money Laundering*

16 95. Furthermore, based on the experience of other investigators working on this
17 matter, who have retired from the Internal Revenue Service – Criminal Investigations,
18 and have over a combined 50 years of experience investigating financial crimes such as
19 tax crimes and money laundering, people engaged in money laundering typically retain
20 documents and records relevant to the money laundering at their associated businesses
21 and their residences. In money laundering matters, such documents often include bank
22 account records, such as checks, statements, account opening forms, receipts, wire
23 transfer information, correspondence, and memos. Those involved in financial crimes
24 such as this maintain records and documents relating to their crimes at these locations for
25 a number of reasons, such as:

26 a. Individuals involved in money laundering often place assets in names other
27 than their own to avoid detection of those assets by the Internal Revenue Service or law
28 enforcement agencies. Even though these individuals place assets in other persons'

1 names, the criminals continue to use those assets and exercise dominion and control over
2 them. Storage of financial records at their places of business or residence enables them to
3 keep track of their assets and maintain their dominion and control over the assets;

4 b. Persons involved in criminal activity often conceal the proceeds of their
5 criminal activity in their places of business or residences. These proceeds often include
6 cash, financial instruments, precious metals and jewelry; and

7 c. Persons engaged in criminal activity often spend the proceeds of their
8 criminal activity and maintain records of their expenditures at their place of business or
9 residence. Specifically these records include:

10 i. Evidence of expenditures or purchase of assets, such as invoices,
11 receipts, rental statements, lease statements, travel records, earnest money
12 agreements, escrow statements, and real estate deeds;

13 ii. Records of the accumulation of assets, such as ledgers, balance
14 sheets and financial statements, reflecting both assets and liabilities;

15 iii. Checking and savings account records consisting of monthly
16 statements, duplicate deposit slips, check registers, and canceled checks
17 reflecting deposits and disbursements;

18 iv. Letters and other documents reflecting communications between
19 associates such as address and phone books reflecting the names and
20 addresses of associates, phone billing records reflecting telephone activity,
21 contracts and other agreements reflecting associations between individuals
22 relative to business ventures and cashier's checks, money orders, and wire
23 transfers that are evidence of expenditures.

24 96. For all of these reasons, there is probable cause to believe that documents and
25 records relating to the above-described drug trafficking and money laundering scheme,
26 including bank and financial records, will be found at the Subject Premises.

Other Potential Crimes

1
2 97. During the course of this investigation I conducted a search of the Washington
3 State Department of Licensing records of Singh, Saroya, and Pawar in order to find out if
4 any of them had an active concealed pistol license (CPL) and if they had any handguns
5 registered. The results of the search indicated that Singh was issued a CPL #E515268, by
6 King County Sheriff's Office, on January 19, 2006. The record indicates Singh did not
7 renew it and that it has since expired on January 19, 2011. The record lists one pistol, an
8 unknown make and model, 9mm pistol, serial number 61BMV01436, purchased from
9 Federal Way Discount Guns on February 6, 2006. Saroya was issued a CPL #F032565,
10 by King County Sheriff's Office, on January 5, 2012. The CPL is active with an
11 expiration date of January 5, 2017. The record lists one pistol, an unknown make and
12 model, 9mm pistol, serial number SA105209, purchased from Federal Way Discount
13 Guns on January 18, 2006. Pawar was issued a CPL #E884407, by King County
14 Sheriff's Office, on May 28, 2010. The CPL is active with an expiration date of
15 5/28/2015. The record lists one pistol, a Stoeger, unknown model, .45 caliber pistol,
16 serial number T642908D026273, purchased from Wholesale Sports on March 19, 2009.
17 Should firearms be found in the course of the search, the possession of such firearms
18 could constitute the crime of Possession of a Firearm in Furtherance of a Drug
19 Trafficking Crime, or a violation of Title 18, United States Code, Section 924(c).

20 98. I conducted a criminal history search of Maurice Gardner. The result of that
21 search indicated that Gardner has at least 9 felony convictions. Gardner is therefore
22 prohibited from possessing firearm/s and ammunition pursuant to Title 18, United States
23 Code, Section 922(g)(1) and Title 18, United States Code, Section 924(e).

24 99. I conducted a criminal history search of Thai Van Thanh. The result of that search
25 indicated that Thanh has at least 16 felony convictions. Therefore Thanh is prohibited
26 from possession of firearm/s and ammunition pursuant to Title 18, United States Code,
27 Section 922(g)(1).

1 100. I conducted a criminal history search of Bruce Edward Fuller. The result of that
2 search indicated that Fuller has at least 11 felony convictions. Fuller is therefore
3 prohibited from possession of firearm/s and ammunition pursuant to Title 18, United
4 States Code, Section 922(g)(1) and Title 18, United States Code, Section 924(e).

5 101. I conducted a criminal history search of Jacob Lewis Day. The result of that
6 search indicated that Day has at least 8 felony convictions. Day is therefore prohibited
7 from possession of firearm/s and ammunition pursuant to Title 18, United States Code,
8 Section 922(g)(1).

9 102. Should firearms be found in the course of the searches of Gardner, Thanh, Fuller,
10 and Day, or of the rooms with which Gardner and Thanh are associated, the possession of
11 such firearms could also constitute the crime of Possession of a Firearm in Furtherance of
12 a Drug Trafficking Crime, or a violation of Title 18, United States Code, Section 924(c).

13 **The Target Owners' Homes**

14 103. For the reasons outlined above, there is probable cause to believe that the Target
15 Owners' residences, located at 3754 South 175th Street, SeaTac, WA (Saroya and Singh)
16 and 15025 8th Avenue South, Burien, WA (Pawar) will contain evidence of the drug and
17 money laundering crimes discussed above. I believe that the residence on South 175th
18 Street is the primary residence of Saroya and Singh, because the residence is in Saroya's
19 name, both men receive mail at the residence, and surveillance over the course of the past
20 year has revealed both men entering the residence, through the garage and through the
21 front door without knocking, at various hours of the day. I have witnessed the two of
22 them take the garbage out and, as recently as August 20, 2013, I saw the vehicles of both
23 men parked at the residence.

24 104. I believe that the residence at 8th Avenue South is the primary residence of Pawar,
25 because the house is in his and his wife's name, Pawar receives mail there, and I have
26 witnessed Pawar on more than one occasion enter the house without knocking. Pawar's
27 CPL application listed this residence as his address.

Specific Motel Rooms

105. As discussed above, this affidavit is also submitted in support of the search warrants seeking authorization to search two motel rooms.

106. Room 305 at the Great Bear has been utilized by Gardner to sell drugs. In total, we have successfully purchased crack from Gardner on three occasions during this investigation: on July 30, 2013, August 7, 2013, and August 9, 2013. All of the deals took place in Room 305 at the Great Bear.

107. Room 207 at the Boulevard has been utilized by Thanh to sell drugs. On August 6, 2013, we purchased crack cocaine from Thanh in this room.

CONCLUSION

108. For the foregoing reasons, I respectfully submit that there is probable cause to believe that evidence of Maintaining a Drug Involved Premises, Drug Distribution, Conspiracy to Distribute Drugs, and Money Laundering, more fully described in Attachment B, will be found in the Subject Premises, more fully described in Attachment A.

Joel E. Miller, Jr., Affiant
Special Agent
Alcohol, Tobacco, Firearms and Explosives (ATF)

SUBSCRIBED AND SWORN to before me this ____ day of August, 2013.

HON. MARY ALICE THEILER
UNITED STATES MAGISTRATE JUDGE

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Richard E. Cohen, Assistant United States Attorney
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
(206) 553-2242, Facsimile: (206) 553-6934

DEFENDANTS

Real Property Located at 14420 Tukwila International Boulevard, Tukwila, WA, King County Parcel Number 004000-0175, et al.

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED. Attorneys(If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
1 1
2 2
3 3
4 4
5 5
6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Table with columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, SOCIAL SECURITY, FEDERAL TAX SUITS, BANKRUPTCY, OTHER STATUTES.

V. ORIGIN

(Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from another district (specify)
6 Multidistrict Litigation
7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 21 U.S.C. § 881(a)(7), and 18 U.S.C. 981(a)(1)(C) for violations of 21 U.S.C. §§ 856(a)(2)

Brief description of cause:

Facilitating property used to maintain a drug involved premises, and property involved in money laundering

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE

DOCKET NUMBER

DATE

August 26, 2013

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE