

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

UNITED STATES OF AMERICA

v.

Case Number 3:19cr104/MCR

DAVID C. WILLIAMS
_____ /

FACTUAL BASIS FOR GUILTY PLEA

The defendant admits that if this case were to proceed to trial, the government could prove the following facts.

In July 2017, the FBI received two anonymous tips through the National Human Trafficking Hotline (NHTH). The NHTH tips indicated the massage parlors located at 7055 Fairfield Drive, Pensacola, Florida, and 1800 Beck Avenue, Panama City, Florida, were offering sexual acts for additional money during massage sessions. These two locations were found to be linked to the defendant and his engagement in operating illicit Asian massage parlors. During the course of the investigation, law enforcement was able to confirm that multiple Asian massage parlor locations, throughout the Northern District of Florida and elsewhere, were employing Asian females who were illegally present in the United States – and the defendant and his conspirators maintained these females at the parlors he was operating during the time frame noted in the indictment (which is incorporated

herein as true and accurate). Indeed, the defendant utilized his cellular telephone as well as the internet in order to arrange for the transport of Asian females between various states throughout the country to work at massage parlor locations wherein acts of prostitution took place. From this, the defendant obtained private financial gain along with his conspirators.

Backpage.com Records

An analysis of Backpage.com records revealed telephone numbers and email addresses associated with Backpage.com advertisements for various massage parlor locations tied to the defendant. The Backpage.com records were reviewed and analyzed resulting in the following summary:

- a. The total number of Backpage.com advertisements connected to Williams and his conspirators was approximately 6827. Of the approximate 6827 advertisements, approximately 5274 were associated with multiple locations in Florida, approximately 1239 were associated with multiple locations in Pennsylvania, and approximately 314 were associated with one location in Virginia.
- b. The advertisements purchased by Williams and his conspirators totaled approximately \$63,952.57.
- c. The advertisements consisted of describing “new cute girls,” “getting your kinks rubbed out by an Asian hottie,” and other such similar descriptions, which tended to focus on the Asian females and used sexually suggestive wording.

Workers Associated with Multiple Massage Parlor Locations

During the course of the investigation, the FBI positively identified numerous Asian females, all of whom purported to be employed as massage therapists at businesses owned, operated or associated with the defendant and his conspirators. Many of these Asian females arrived in the United States from China and traveled extensively throughout the United States. This is indicative of trafficking/moving females to different massage parlor locations. Moreover, a review of records conducted by the Department of Homeland Security revealed that multiple Asian females identified by law enforcement as employed by the defendant and his conspirators were present in the United States illegally and were being housed in the actual massage parlors.

Google Account Search Warrant

The FBI obtained a federal search warrant for the defendant's email account. Williams's Google account contained photographs of various documents pertaining to violations ranging from unlicensed massage workers to prostitution at multiple massage parlor locations. For example, Williams had the following documents in his account:

- a. A photograph of a document from the Florida Department of Health indicating Asian females admitted using a massage business location as their primary domicile, as evidenced by mattresses, personal hygiene items, pillows, suitcases with clothes and a refrigerator with food.

- b. A Preliminary Hearing Notice Summons for Criminal Case and a police complaint document pertaining to a prostitution arrest at one of the defendant's massage parlor locations.
- c. A photograph of an "Order Vacating And Setting Aside Conviction" from Duval County, Jacksonville, Florida, reference case number 16-2016-MM-0258-AXXX. The case number pertained to a criminal charge of "Offering for Prostitution" against another massage parlor employee of the defendant.
- d. Two Florida Department of Health Case Summary records citing an employee with an attempt to induce a client into sexual misconduct and attempting to engage in sexual misconduct.
- e. Photographs of various forms of identification such as passports, massage licenses for Florida and Pennsylvania, driver's licenses for New York, Pennsylvania, Florida, California and Georgia, Social Security cards, identification cards for New York, employment authorization cards and Permanent Resident cards for approximately three dozen Asian females.
- f. Various documents such as Articles of Incorporation, business licenses, utility bills, checks, and bank statements linked to approximately twenty massage parlor locations in Pennsylvania, Florida, and Massachusetts.

Airline Transportation of Aliens

A review of Williams's Google account along with his American Express credit card statements revealed he purchased over two dozen airline tickets for Asian females during the time frame charged in the indictment. A majority of the airline tickets purchased were to/from New York (La Guardia Airport and JFK Airport)

with Florida destinations. Some of these Asian females were tied directly to the illicit massage parlors operated by the defendant and his conspirators.

Financial Records Analysis

During the course of the investigation, Bank of America account ending in 0716 was identified as Williams's primary personal bank account. Analysis of the account revealed that between December 7, 2017, and March 7, 2019, the account received deposits totaling approximately \$137,506. Deposits to the account consisted primarily of cash and transfers from Bank of America account ending in 8882.

Records obtained from Bank of America show that on or about July 6, 2017, Williams opened Bank of America account ending in 8882. The account is a business checking account titled "AAA Pro Sales Corp." This was the defendant's shell company for his illicit massage parlor ventures as noted above. On the account opening documents, Williams identified himself as the President, Secretary, and Director of AAA Pro Sales Corp. Analysis of the account shows that between December 1, 2017, and March 31, 2019, the account received deposits totaling \$282,889. The account was funded primarily by transfers from Bank of America account ending in 0716, cash deposits, and transfers from:

- a. Bank of America account ending in 9158, titled Asian Massage Clearwater LLC;

- b. Bank of America account ending in 2593, titled Asian Massage Tampa LLC;
- c. Bank of America account ending in 0616, titled Asia Pro Walk in Massage LLC
- d. Bank of America account ending in 8477, titled All Pro Walk in Massage LLC;
- e. Wells Fargo Bank account ending in 5386, titled All Day Walk in Massage LLC;
- f. Bank of America account ending in 4461, All Day Walk in Massage LLC.

In total, hundreds of thousands of dollars passed through the relevant bank accounts that are linked to the defendant and his illicit activity since 2016. These massage parlor accounts were often in nominee names, of Asian females linked to the businesses, in order for the illicit activity to shield the defendant's involvement. Yet, the defendant profited from operating these massage parlors wherein Asian females engaged in prostitution for the financial gain of the defendant and his conspirators. The defendant then conspired with others to utilize the aforementioned bank accounts, amongst other things as noted in the incorporated indictment, to launder the proceeds.

Elements of the Offenses

Count One

1. Interstate travel, the use of the mails, or the use of the facilities of interstate commerce such as a cellular telephone or the internet;
2. With the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment or carrying on, of any unlawful activity such as prostitution; and
3. Subsequent performance or attempted performance of an act such as prostitution, or aiding or abetting the same.

Count Two

1. The knowing transportation of any individual (in interstate or foreign commerce); and
2. The purpose of the travel was for an individual to engage in prostitution, or aiding or abetting the same.

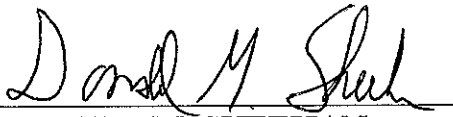
Count Three


1. An alien present in the United States;
2. Who was not lawfully present;
3. That the defendant knew or acted in reckless disregard of the fact that the alien was not lawfully in the United States; and
4. The defendant harbored, concealed, or shielded from detection or attempted to harbor, conceal or shield from detection for the purpose of commercial gain or private financial advantage such as profiting off of acts of prostitution while housing aliens at massage parlors.

Count Four

1. Two or more people agreed to try to accomplish a common and unlawful plan to launder proceeds of illicit massage parlor acts through the transfer of monetary instruments within a financial institution, use of money orders or wire transfers, or the issuance of checks or clearing house transactions; and
2. The defendant knew about the plan's unlawful purposed and voluntarily joined it.

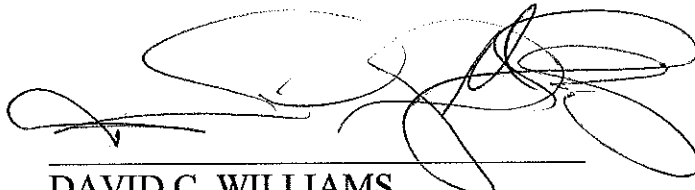
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11/5/19
Date

11/14/19
Date


DAVID C. WILLIAMS
Defendant

11/5/19
Date