

Approved: Michael D. Neff
LAUREN SCHORR/SIDHARDHA KAMARAJU/MICHAEL NEFF
Assistant United States Attorneys

Before: HONORABLE JAMES L. COTT
United States Magistrate Judge
Southern District of New York

16 MAG 2398

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:
UNITED STATES OF AMERICA : SEALED COMPLAINT
:
- v. - : 16 Mag.
:
RYAN JUNGHUN KIM, : Violations of 18
a/k/a "Ryan Junghun Choi," a/k/a "Ki : U.S.C. §§ 371, 1952,
Soo Choi," a/k/a "Lion King," : and 1956
:
HOI HAM, :
SUNG HWAN KIM, : COUNTY OF OFFENSE:
a/k/a "Sean Kim," : NEW YORK
:
YOUNG HO JOO, :
a/k/a "Jay Joo," :
:
MI SOOK KIM, :
SU YEON YUN, :
a/k/a "Bebe," :
:
HYUN JOO LEE, :
HYUN JOO SHIN, :
YING AI LI, :
a/k/a "Sung Soon Kim," :
JIN AE JUNG, :
a/k/a "Jaqueline Kim," a/k/a "Jackie :
Kim," and :
MOOJA PETERSON, :
a/k/a "MJ," :
:
Defendants. :
:
----- X

SOUTHERN DISTRICT OF NEW YORK, ss.:

JUSTIN ELLARD, being duly sworn, deposes and says that
he is a Special Agent with the U.S. Department of State -
Diplomatic Security Service, and charges as follows:

COUNT ONE

(Money Laundering Conspiracy)

1. From in or about 2011 through in or about 2016, in the Southern District of New York and elsewhere, RYAN JUNGHUN KIM, a/k/a "Ryan Junghun Choi," a/k/a "Ki Soo Choi," a/k/a "Lion King," HOI HAM, SUNG HWAN KIM, a/k/a "Sean Kim," YOUNG HO JOO, a/k/a "Jay Joo," MI SOOK KIM, SU YEON YUN, a/k/a "Bebe," HYUN JOO LEE, HYUN JOO SHIN, YING AI LI, a/k/a "Sung Soon Kim," JIN AE JUNG, a/k/a "Jaqueline Kim," a/k/a "Jackie Kim," and MOOJA PETERSON, a/k/a "MJ," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Sections 1956(a)(1)(A)(i).

2. It was a part and an object of the conspiracy that RYAN JUNGHUN KIM, a/k/a "Ryan Junghun Choi," a/k/a "Ki Soo Choi," a/k/a "Lion King," HOI HAM, SUNG HWAN KIM, a/k/a "Sean Kim," YOUNG HO JOO, a/k/a "Jay Joo," MI SOOK KIM, SU YEON YUN, a/k/a "Bebe," HYUN JOO LEE, HYUN JOO SHIN, YING AI LI, a/k/a "Sung Soon Kim," JIN AE JUNG, a/k/a "Jaqueline Kim," a/k/a "Jackie Kim," and MOOJA PETERSON, a/k/a "MJ," the defendants, and others known and unknown, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, willfully and knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, harboring individuals for purposes of commercial sex acts, traveling in interstate and in foreign commerce, and using and causing to be used mails and interstate facilities, in violation of Title 18, United States Code, Section 1952, with the intent to promote the carrying on of such specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

(Title 18, United States Code, Section 1956(h).)

COUNT TWO

(Travel Act Conspiracy)

3. Between in or about 2012 and in or about 2016, in the Southern District of New York and elsewhere, RYAN JUNGHUN KIM, a/k/a "Ryan Junghun Choi," a/k/a "Ki Soo Choi," a/k/a "Lion King," HOI HAM, SUNG HWAN KIM, a/k/a "Sean Kim," YOUNG HO JOO, a/k/a "Jay Joo," MI SOOK KIM, SU YEON YUN, a/k/a "Bebe," HYUN JOO LEE, HYUN JOO SHIN, YING AI LI, a/k/a "Sung Soon Kim," JIN AE JUNG, a/k/a "Jaqueline Kim," a/k/a "Jackie Kim," and MOOJA

PETERSON, a/k/a "MJ," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other, to commit an offense against the United States, to wit, a violation of Title 18, United States Code, Section 1952.

4. It was a part and object of the conspiracy that RYAN JUNGHUN KIM, a/k/a "Ryan Junghun Choi," a/k/a "Ki Soo Choi," a/k/a "Lion King," HOI HAM, SUNG HWAN KIM, a/k/a "Sean Kim," YOUNG HO JOO, a/k/a "Jay Joo," MI SOOK KIM, SU YEON YUN, a/k/a "Bebe," HYUN JOO LEE, HYUN JOO SHIN, YING AI LI, a/k/a "Sung Soon Kim," JIN AE JUNG, a/k/a "Jaqueline Kim," a/k/a "Jackie Kim," and MOOJA PETERSON, a/k/a "MJ," the defendants, and others known and unknown, wilfully and knowingly would and did travel in interstate commerce, and use the mail and facilities in interstate and foreign commerce, with the intent to distribute the proceeds of an unlawful activity, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, to wit, prostitution and money laundering, and thereafter would and did perform an act to distribute the proceeds of said unlawful activity, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of said unlawful activity, in violation of Title 18, United States Code, Sections 1952(a)(1) and (a)(3).

Overt Acts

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

a. During the period of the conspiracy, RYAN JUNGHUN KIM, a/k/a "Ryan Junghun Choi," a/k/a "Ki Soo Choi," a/k/a "Lion King," the defendant, used multiple email accounts to exchange emails with an online website that serves as a content aggregator (the "Advertising Website"), regarding payments for and the substance of advertisements.

b. In or about September and October 2015, HOI HAM, the defendant, collected cash proceeds of prostitution from several brothels in New York, New York.

c. Between in or about December 2011 and in or about September 2013, SUNG HWAN KIM, a/k/a "Sean Kim," the defendant, maintained bank accounts that remitted payments to the Advertising Website.

d. Between in or about December 2011 through in or about May 2014, YOUNG HO JOO, a/k/a "Jay Joo," the defendant, maintained a bank account that remitted payments to the Advertising Website.

e. On or about April 28, 2015, MI SOOK KIM, the defendant, sent an email to an account known to be used by RYAN JUNGHUN KIM, which attached several photographs of a woman posing in a sexually explicit manner.

f. On or about June 14, 2014, SU YEON YUN, a/k/a "Bebe," the defendant, sent an email to an account known to be used by RYAN JUNGHUN KIM, regarding the website for one of the Brothels.

g. On or about April 8, 2015, HYUN JOO LEE, the defendant, sent an email to an account known to be used by RYAN JUNGHUN KIM, which attached sexually explicit photographs of a woman called "Jenna."

h. On or about September 30, 2013, HYUN JOO SHIN, the defendant, sent an email to an account known to be used by RYAN JUNGHUN KIM. The email stated in the body "Asian flower ruby."

i. On or about May 20, 2014, YING AI LI, a/k/a "Sung Soon Kim," the defendant, sent an email to an account known to be used by RYAN JUNGHUN KIM, with the subject line "FW: Heaven," which attached photographs of a woman posing in a sexually explicit manner.

j. On or about April 19, 2014, JIN AE JUNG, a/k/a "Jaqueline Kim," a/k/a "Jackie Kim," the defendant, sent an email to an account known to be used by RYAN JUNGHUN KIM, which attached several photographs of one or more women posing in a sexually explicit manner.

k. On or about November 27, 2014, MOOJA PETERSON, a/k/a "MJ," the defendant sent an email to an account known to be used by RYAN JUNGHUN KIM, which said "Ryan, I se t u seven pictures her name is Rachel. First time in USA please put her pictures up starting sunday take coco down. Put rachel fitst on web and advertising thank u." The email attached sexually explicit photographs of a woman called "Rachel."

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

The bases for my knowledge and the foregoing charge are, in part, as follows:

6. I am a Special Agent with the U.S. Department of State - Diplomatic Security Service. This Affidavit is based upon my personal participation in the investigation, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this Affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Background On The Korean Brothel Industry In
The New York Metro Area

7. Based on my participation in the investigation, my conversations with other law enforcement agents and others, and my review of documents obtained during the investigation, I have learned, among other things, that:

a. The immigration laws of the United States allow citizens of certain countries, including South Korea, to travel to the United States without a visa. To do so, citizens of these countries can apply for a visa waiver through an electronic system called the "ESTA" system. To qualify for such a waiver, the applicant must affirm that he or she is visiting the United States for tourism purposes, and that the applicant will not work while in the United States.

b. Individuals, commonly referred to as "brokers," offer immigration services to, among others, young women living in and around South Korea. In particular, these brokers claim that they can arrange for young women to travel to the United States via the aforementioned visa waiver program, or by helping them to fraudulently obtain various kinds of non-immigrant visas. In some cases, these brokers exploit the ESTA system, instructing the women about how to file fraudulent visa waiver forms. Other times, the brokers arrange for the women to travel first to Mexico or Canada, and then to cross into the United States illegally. United States-based brothel "owners" have also been known to provide the same sorts of services, either in concert with "brokers," or by independently communicating with Korean females themselves.

c. Some of the women travel to the United States fully intending to work illegally as prostituted women upon their arrival. These females are also obliged to turn over a certain percentage of their earnings to the owners, in order to cover their room and board expenses, as well as the cost of advertising their services.

d. Several of the businesses operate in and around the New York City area. These businesses typically operate brothels, which, at times, pose as legitimate businesses, such as spas. Often, these businesses maintain lists of customers who have been vetted or vouched for by other brothels or customers, and will generally cater only to those customers.

e. Often these businesses specialize in a particular type of prostitution, which is referred to as the "Girlfriend Experience," or "GFE." GFE brothels offer clients a specific type of prostitution experience, which is often priced at double the rate of normal prostitution services. Advertisements for such brothels typically contain certain hallmarks, such as the acronym GFE placed adjacent to the photo of a given prostituted woman, often in lingerie or nude. The acronym GFE will often be paired with the word "new" or "first time in USA."

f. These businesses, including GFE brothels, will often operate websites, which are used to, among other things, advertise specific women who are working at the business's brothel. These women typically use stage names or pseudonyms. Generally, clients can request appointments with specific women, and can ask either to meet with the woman at one of the business's brothels (often called "in-calls"), or at a location of the client's choosing (often referred to as "out-calls"). It is not uncommon for prostituted women to work at multiple brothels, or to transition from a brothel or business that is closing to another brothel or business. Furthermore, the prostituted women will sometimes rotate among certain brothels with an established relationship between (or with common) proprietors, in order to offer "new girls" periodically, to attract repeat clients who will often e-mail the brothel specifically to ask if any new or different girls are available.

The Brothels

8. Starting in or about 2012, the Department of State - Diplomatic Security Service ("DSS"), Department of Homeland Security - Homeland Security Investigations ("HSI"),

the Internal Revenue Service (the "IRS"), and the Postal Inspection Service (the "USPIS," and together with DSS, HSI, and IRS, the "Investigating Agencies") have been investigating brothels that operate, among other places, in and around South Korea, New York, and New Jersey. As described in more detail below, based on my participation in the investigation, my conversations with other law enforcement agents and others, and my review of documents and reports, I have learned that the investigation has identified a group of Korean brothels (the "Brothels") in the New York metro area that are independently owned but assist each other, including by sharing customer lists, and employing the same women, and that advertise through common sources.

9. The defendants charged in this Complaint, as set forth in detail below, are individuals who operated the Brothels, including advertisers, website developers, brothel owners, and brothel managers. The defendants engaged in money laundering, through which they used the proceeds of harboring individuals for the purpose of commercial sex acts to promote those activities. From approximately 2011 until approximately 2016, those individuals collectively laundered in excess of \$1,400,000 of illegal proceeds through bank and wire transmission services in New York City and elsewhere.

10. The Brothels include, but are not limited to:

a. "Fantasia," which is located at or about 162 Henry Street, in New York, New York, and which advertises through the website www.nycfantasia.com (the "Fantasia Website").

b. "Asian Flower," which is located at on or about 599 Sixth Avenue, in New York, New York, and which advertises through the website www.nycasianflower.com (the "Asian Flower Website").

c. "Rose House," which is located at 536 Third Avenue, in New York, New York, and which advertises through the website www.rosehousenyc.com (the "Rose House Website").

d. "Yes Asian," formerly known as "Lovely Asian," which is located at 38 W. 39th Street, in New York, New York, and which advertises through the website www.yesasiannyc.com (the "Lovely Asian Website").

e. "Blue Angel," which is located at 48 W. 46th Street, in New York, New York, and which advertises through the website www.nycblueangel.com (the "Blue Angel Website").

f. "Hot Lips," which is located at 55 W. 45th Street, in New York, New York, and which advertises through the website www.hotlipsnyc.com (the "Hot Lips Website").

g. "VIP Asian," which is located at 150 E. 46th Street, in New York, New York, and which advertises through the website www.nyvipasian.com (the "VIP Asian Website").

h. "Dream Girl," which is located at 58 E. 56th Street, in New York, New York, and which advertises through the website www.dreamgirlnyc.com (the "Dream Girl Website").

i. "Secret Diary," which was located at 156 E. 33rd Street, in New York, New York, and which used to advertise through the website www.secretdiarynyc.com (the "Secret Diary Website").

j. "Asian Paradise," which is located at 312 Fifth Avenue, in New York, New York, and which advertises through the website www.nyasianparadise.com (the "Asian Paradise Website"). Asian Paradise previously operated under the name "Blue Sky," which was located at 312 Fifth Avenue before Asian Paradise. Blue Sky used to advertise through the website www.blueskyasian.com (the "Blue Sky Website").

k. "Rainbow Spa," which is located at 45 E. 34th Street, in New York, New York. To my knowledge, "Rainbow Spa" does not advertise through a website.

11. As part of the investigation, law enforcement has interviewed an individual ("CW-1").¹ CW-1 has informed law enforcement, in substance and in part, that:

a. CW-1 was born in South Korea.

b. In or about 2003, CW-1 was introduced to a broker in South Korea, who promised CW-1, in substance and in

¹ CW-1 has pleaded guilty to, among other things, violations of the Travel Act and money laundering. CW-1 is cooperating with law enforcement in the hope of receiving a more lenient sentence. To date, information provided by CW-1 has proven reliable, and has been corroborated, in part, by, among other things, documentary evidence.

part, to transport CW-1 to the United States in exchange for approximately \$10,000, which CW-1 agreed to pay.

c. That same year, CW-1 traveled to the United States through Mexico. Once in the United States, CW-1 began to work in prostitution at "in-call" brothels in several cities, including New York.

d. CW-1 was prostituted at a brothel in New York. While there, CW-1 was advertised on a website for the brothel, as were other women who were prostituted at the brothel.

e. The owners of the "in-call" brothels shared a list of customers that was updated regularly, which included customers' phone numbers.

f. In the brothels, the term "GFE" referred to specific types of sex acts, including kissing women who were being prostituted, and not using a condom for certain sexual activity. While every prostituted woman working in the Brothels did not perform GFE acts, typically, each brothel had at least one prostituted woman who would engage in GFE activity. Furthermore, the websites for the brothels advertised which women performed GFE services.

g. After working at the brothel, CW-1 began to operate a brothel. CW-1 used a social media communication application called KakaoTalk to communicate with other brothel owners.

12. As part of the investigation, law enforcement has been working with a confidential source ("CS-1").² CS-1 has informed law enforcement, in substance and in part, that:

a. Beginning in or about 2009, CS-1 began working in brothels.

b. In or about 2014, CS-1 began to work at Fantasia. CS-1 subsequently left Fantasia, and began to work at Dream Girls and Asian Flower.

² CS-1 was an employee of some of the Brothels, and was approached by law enforcement in connection with this investigation. CS-1 is cooperating with the investigation, in the hope of receiving leniency. To date, information provided by CS-1 has proven reliable, and has been corroborated, in part, by documentary evidence.

c. CS-1 worked at these brothels as a manager. CS-1's responsibilities included, among other things, making appointments for customers, collecting money owed to the business, and making payments to advertisers. Typically, the prostituted women would keep a portion of the money paid by the customer, and the rest would be turned over to the owner of the brothels.

d. CS-1 identified Fantasia, Asian Flower, Rose House, Yes Asian, Blue Angel, Hot Lips, VIP Asian, Dream Girls, Asian Paradise, and Rainbow as part of the Brothels. As described further below, CS-1 explained that the Brothels were independently owned, but assist each other. For example, the Brothels share a customer list, employed overlapping groups of women, and exchanged information regarding law enforcement.

e. The Brothels maintain a large list of customers who were "approved" to visit the Brothels. When a brothel received an incoming call from a potential customer, the telephone number was checked against the list. The list was divided into multiple categories, including, among other things, "approved" customers and suspected law enforcement. In addition, the list contained notes about the customers.

f. The owners of the Brothels also shared information via KakaoTalk.

g. Owners and others associated with the Brothels would regularly recruit women living both in the United States and in South Korea to prostitute themselves in the Brothels. In the past, women wanting to travel to the United States to work in the Brothels would work with a visa broker who would arrange for their travel. Since the institution of the visa waiver program described above, however, broker services have become less prevalent, and the women can arrange for their travel themselves.

13. On or about April 30, 2015, the New York City Police Department (the "NYPD") raided Blue Angel as part of an undercover operation. During the raid, the NYPD identified HYUN JOO LEE, the defendant. During the search of Blue Angel, which was conducted pursuant to a search warrant, the following materials, among others, were found:

a. Cellphones used by LEE and other women. Searches of these cellphones revealed, among other things, contact information for clients, brothels, and other sex

workers. In particular, one of the cellphones contained a link to a social media account used by an individual named "Ryan Kim."

b. Computers, one of which contained an electronic file containing more than 70,000 entries of telephone numbers and notes that appear to describe customers of the brothel.³ Based on my review of the document, this appears to be a version of the customer list described by CS-1.

c. Bundles of cash, together with bank deposit slips and receipts.

d. Financial ledgers that reflected cash inflows and outflows for the prostitution business, and customer appointment sheets.

e. A lease agreement for the location at Blue Angel's address, which was in the name of MOOJA PETERSON, a/k/a "MJ," the defendant.

f. Utility bills for the location of Blue Angel's address, which was in PETERSON's name.

14. On or about March 24, 2016, the NYPD raided Asian Paradise after an undercover operation (the "Asian Paradise Raid"). During the Asian Paradise Raid, law enforcement found several women, including a manager of the brothel ("CC-1"). Also during the Asian Paradise Raid, law enforcement observed CC-1 hand money to prostituted women at the brothel.

Advertising For The Brothels

15. Based on my training and experience, my conversations with other law enforcement agents and others, and my participation in the investigation, I know that CW-1 told law enforcement, in substance and in part, that:

a. While CW-1 operated a brothel, CW-1 used three individuals to advertise for her business, including two men she knew as "Ryan" and "Sean."

b. CW-1 paid "Ryan" and "Sean" monthly. At times, CW-1 made cash deposits into bank accounts controlled by

³ The notations on the list are in Korean, and have been translated as part of the investigation. These translations are preliminary, and may change with further investigation.

"Ryan" and "Sean." On other occasions, "Ryan" and "Sean" would collect the money themselves, or send others to collect the money on their behalf.

16. Based on my review of records, Internet websites, and the returns from orders for email header information issued pursuant to Title 18, United States Code, Section 2703(d), I have learned, among other things, the following:

a. Other than Rainbow Spa, which purports to be a legitimate business, the Brothels advertise online through websites (the "Brothel Websites"). Commercial sex trafficking businesses routinely advertise their services through an online content aggregator (the "Advertising Website"). These businesses typically create an account with the Advertising Website, through which they can upload and modify their advertisements. To access these Advertising Website accounts, the users log in using an email account and password.

b. Records provided by the Advertising Website show that a certain email account (the "Dennis Kim Email Account") is listed as a customer-provided contact email address for a subset of the Brothel Websites. In addition, these records show that, between in or about April 2013 and in or about January 2015, the Dennis Kim Email Account was regularly used to access the Advertising Website accounts for these businesses, as well as to receive invoices from the Advertising Website.

c. Records provided by the Advertising Website show that a certain email account (the "MultiFly Email Account") is listed as a customer-provided contact email address for a subset of the Brothel Websites. In addition, these records show that, between in or about December 2013 and in or about January 2015, the MultiFly Email Account was regularly used to access the Advertising Website accounts for these businesses, as well as received invoices from the Advertising Website.

d. Records provided by the Advertising Website show that a subset of the Brothel Websites is linked to an address in Bayside, New York (the "Bayside Address") and an address in Flushing, New York (the "Flushing Address"). In commercial databases, the Bayside Address is listed as a former residence of YOUNG HO JOO, a/k/a "Jay Joo," the defendant, and the Flushing Address is identified as an the address of a restaurant that is associated with JOO.

17. Based on my participation in the investigation and my conversations with other law enforcement agents and others, I have learned that in or about 2014 and 2015, law enforcement obtained search warrants for several email accounts (the "Email Search Warrants"). Based on my participation in the investigation, my conversations with other law enforcement agents and others, my familiarity with the investigation, including review of emails produced pursuant to the Email Search Warrants, and my review of online and other publicly available sources, I have learned, among other things, that the users of the searched accounts use emails to, among other things, communicate with co-conspirators involved in the advertising for the Brothels and otherwise manage the brothels, including, but not limited to:⁴

a. The Dennis Kim Email Account and the MultiFly Email Account contained email correspondence with the Advertising Website concerning advertisements for brothels associated with the Brothels, including, but not limited to:

i. On or about December 7, 2014, the MultiFly Email Account exchanged emails with the Advertising Website about a payment issue.

ii. On or about May 17, 2015, the Dennis Kim Email Account exchanged emails with the Advertising Website concerning an advertisement for Blue Angel.

iii. On or about May 18, 2015, the Dennis Kim Email Account exchanged emails with the Advertising Website concerning an advertisement for Fantasia.

b. Two email accounts (the "S. Kim Email Accounts") contained several emails relating to advertising for several of the Brothels, including, but not limited to:

i. On or about August 27, 2011, an email account (the "Jay Email Account") sent an email to one of the S. Kim Email Accounts. In the email, the sender asks the recipient, in substance and in part, "HOT ASIAN NYC (If possible, please upload the photo on the right as well...attached

⁴ The emails reviewed are primarily in Korean, and have been translated as part of the investigation. These translations, and any descriptions of the contents of the email herein, are preliminary and subject to change based on further investigation.

files." The email appears to also contain hyperlinks for two advertisement for Hot Asian.

ii. On or about November 15, 2011, the Jay Email Account sent an email to one of the S. Kim Email Accounts. In the email, which is signed by "Jay Joo," the author asks the recipient, in substance and in part, to "remove Pinky," and discusses payment for the number of times an electronic advertisement has been uploaded. The email attaches a chart that appears to depict a schedule related to various brothels, including Hot Asian.

iii. On or about June 15, 2014, the MultiFly Email Account forwarded an email to one of the S. Kim Email Accounts. The subject line of the forwarded email is "blue angel design." The forwarded email states, in substance and in part, "Please arrange the order of the girls as Vanilla, Cookie, BeBe, Peach, Eva, and Kelly."

iv. On or about November 30, 2014, the MultiFly Email Account forwarded an email to one of the S. Kim Email Accounts. The subject line of the forwarded email is "This 46 St." Blue Angel, I know, was located on W. 46th Street in New York, New York. The forwarded email states, in substance and in part, "My name is Rachel. This is my first time in the U.S. Also for GFE, main photo and advertisement, please upload the ones that you like, Lion..."

v. On or about July 20, 2015, one of the S. Kim Email Accounts exchanged emails with the Advertising Website regarding two USPS money orders that were used to pay for advertising. Based on my review of those money orders, I have learned that the money orders list one of the S. Kim Email Accounts, as well as HOI HAM, the defendant's, residence in New Jersey as contact information on the money orders.

c. Two email accounts (the "Shin Email Accounts") contained several emails related to advertising for and management of Asian Flower, including, but not limited to:

i. On or about September 30, 2013, one of the Shin Email Accounts sent an email to the MultiFly Email Account. The email stated in the body "Asian flower ruby." The email attached sexually explicit photographs of a female, which also appeared on the Asian Flower Website.

ii. On or about October 2, 2013, one of the Shin Email Accounts sent an email to the MultiFly Email Account,

with the subject line "Hera..Asian Flower." The email attached sexually explicit photographs of a female, which also appeared on the Asian Flower Website.

iii. On or about October 6, 2014, one of the Shin Email Accounts received an email addressed to "Hyun Joo," from a local restaurant confirming a delivery to the address of Asian Flower.

d. An email account (the "Li Email Account") contained several emails relating to the management of and advertising for Dream Girls, including, but not limited to:

i. On or about May 20, 2014, the Li Email Account sent an email to the MultiFly Email Account, with the subject line "FW: Heaven," which attached photographs of a woman posing in a sexually explicit manner. Based on my training and experience, my conversations with other law enforcement agents and others, and my familiarity with the investigation, I believe that these photographs are consistent with the types of photographs that are used to advertise for the Brothels.

ii. On or about June 8, 2015, the Li Email Account sent an email to the MultiFly Email Account which attached photographs of a woman posing in a sexually explicit manner. Based on my training and experience, my conversations with other law enforcement agents and others, and my familiarity with the investigation, I believe that these photographs are consistent with the types of photographs that are used to advertise for the Brothels.

iii. On or about June 12, 2015, an electronics vendor sent an email to the Li Email Account concerning the purchase and delivery of a refrigerator to Dream Girl's address.

e. An email account (the "Lee Email Account") contained several emails relating to the management of and advertising for Blue Angel, including, but not limited to:

i. On or about April 8, 2015, the Lee Email Account sent an email to the MultiFly Account, which attached sexually explicit photographs of a woman called "Jenna."

ii. On or about May 17, 2015, the Lee Email Account sent an email to the MultiFly Account, which attached sexually explicit photographs of a woman called "Emma" (the

"First Emma Photographs"). The subject line of the email was "emma blueangel." By in or about November 2015, these same photographs of "Emma" appeared on the Blue Angel Website.

f. An email account (the "Yun Email Account") contained several emails relating to the management of and advertising for Blue Angel, including, but not limited to:

i. On or about October 28, 2013, the Yun Email Account sent an email to a specific email account (the "Jay Account"). The email attached sexually explicit photographs of women called "Emma" (the "Second Emma Photographs") and "Peach." I have reviewed the First Emma Photographs and the Second Emma Photographs, and they appear to depict the same individual.

ii. On or about June 14, 2014, the MultiFly Account sent an email to Yun Email Account with the subject line "blue angel revised." The email attached what appears to be a screen shot of the Blue Angel Website.

iii. On or about June 15, 2014, the Yun Email Account exchanged emails with the MultiFly Account regarding the Blue Angel Website. The subject line of the emails in this exchange was "blue angel design."

iv. On or about June 23, 2014, the MultiFly Account sent an email to the Yun Email Account with the subject line "Old coco." The email attached sexually explicit photographs of a woman called "Coco."

g. An email account (the "Peterson Email Account") contained several emails related to the management of and advertising for Blue Angel and Blue Sky, including, but not limited to:

i. On or about November 27, 2014, the Peterson Email Account sent an email to MultiFly Account, which said "Ryan, I se t u seven pictures her name is Rachel. First time in USA please put her pictures up starting sunday take coco down. Put rachel fitst on web and advertising thank u." The email attached sexually explicit photographs of a woman called "Rachel." Photographs that appear to depict "Rachel" subsequently appeared on the Blue Angel website.

ii. On or about June 1, 2015, the Peterson Email Account received an email concerning billing for trash pick-up at Blue Sky.

h. An email account (the "Hello Cutie Email Account") contained several emails concerning the management of and advertising for Secret Diary, including, but not limited to:

i. On or about July 18, 2013, the Hello Cutie Email Account sent an email to the MultiFly Account. The subject line of the email reads "Secret diary new girl." In the email, the user of the Hello Cutie Email Account writes, in substance and in part, "Please use the name Kay. Since the face is not really obstructed, could you please obscure the entire area? It's my first time in New York. I do gfe." The email also attached several photographs of a woman posing in a sexually explicit manner. Based on my training and experience, my conversations with other law enforcement agents and others, and my familiarity with the investigation, I believe that these photographs are consistent with the types of photographs that are used to advertise for the Brothels.

ii. On or about October 12, 2013, the Hello Cutie Email Account received an email containing transcripts of KakaoTalk chats. In these chats, the user of the Hello Cutie Account discusses with the owner of Rose House transferring cellphone accounts, title transfers, and biographical information, among other things.

iii. On or about April 19, 2014, the Hello Cutie Account sent an email to the MultiFly Account, which attached several photographs of one or more women⁵ posing in a sexually explicit manner. Based on my training and experience, my conversations with other law enforcement agents and others, and my familiarity with the investigation, I believe that these photographs are consistent with the types of photographs that are posted on websites used by the Brothels.

iv. On or about October 22, 2014, the Hello Cutie Account who is forwarded an email that attached what is described in the email as "KakaoTalkChats.txt." The subject line of the email is "Ryan." The attached file appears to contain a series of transcripts of KakaoTalk chats that occurred in or about 2014. In these chats, an individual called "Ryan" discusses, among other things, switching photographs of various women, as well as rates for advertising.

⁵ The faces of the women in the photographs are blurred, and thus, law enforcement cannot determine whether the photographs depict the same or different women.

i. An email account (the "Eunjin Email Account") contained several emails related to the management of Rainbow Spa, including, but not limited to:

i. On or about November 21, 2011, the Eunjin Email Account emailed the Jay Account. The email attached several photographs of one or more women posing in a sexually explicit manner.⁶ Based on my training and experience, my conversations with other law enforcement agents and others, and my familiarity with the investigation, I believe that these photographs are consistent with the types of photographs that are used to advertise for the Brothels.

ii. On or about December 6, 2013, the Eunjin Email Account sent an email to another email account. The subject of the email reads "This is the 34th Street List...[symbol of a smiling face]." The email attached a document which appears to be similar to the approved customer list described by CS-1 and found during the Blue Angel Raid.

iii. On or about April 28, 2015, the Eunjin Email Account sent an email to the Dennis Kim Email Account. The email attached several photographs of a woman posing in a sexually explicit manner. Based on my training and experience, my conversations with other law enforcement agents and others, and my familiarity with the investigation, I believe that these photographs are consistent with the types of photographs that are used to advertise for the Brothels.

iv. On or about May 1, 2015, the Eunjin Email Account sent an email to the Dennis Kim Email Account. The email attached a photograph of woman posing in a sexually explicit manner. Based on my training and experience, my conversations with other law enforcement agents and others, and my familiarity with the investigation, I believe that this photograph is consistent with the types of photographs that are used to advertise for the Brothels.

18. Based on my training and experience, my conversations with other law enforcement agents and others, and my familiarity with the investigation, including my review of the contents of the Dennis Kim Email Account, the MultiFly Email Account, the S. Kim Email Accounts, the Shin Email Accounts, the Jay Email Account, the Li Email Account, the Lee Email Account,

⁶ The faces of the women in the photographs are blurred, and thus, law enforcement cannot determine whether the photographs depict the same or different women.

the Peterson Email Account, the Hello Cutie Email Account, the Eunjin Email Account, and another email account searched pursuant to the Email Search Warrants (the "RJ Choi Email Account"), and have learned, among other things, that those email accounts are linked to the defendants in at least the following ways:

a. The Dennis Kim Email Account appears to be linked to RYAN JUNGHUN KIM, a/k/a "Ryan Junghun Choi," a/k/a "Ki Soo Choi," a/k/a "Lion King," the defendant, because, among other things, the account contains (i) email exchanges in which the Dennis Kim Email Account is identified as "Ryan Kim <[the Dennis Kim Email Account]>"; (ii) email exchanges in which the Dennis Kim Email Account is described as having been "Sent via Ryan's iPhone"; and (iii) email receipts for incoming transfers of funds from HOI HAM, the defendant, who is KIM's mother.

b. The MultiFly Email Account appears to be linked to RYAN JUNGHUN KIM because, among other things, (i) the account contains emails signed as "Ryan," (ii) the account holds emails that are described as having been "Sent via Ryan's iPhone," (iii) the account identifies the Dennis Kim Email Account as the recovery email account, and (iv) an IP address associated with the account resolved back to two cellular telephones, one of which bears a telephone number that is subscribed to HOI HAM, the defendant, who is KIM's mother.

c. The RJ Choi Email Account appears to be linked to RYAN JUNGHUN KIM because, among other things, the account contains an email, which lists in the To: field "Ryan Kim <[RJ Choi Email Account]>," and which forwards a screenshot of a computer screen displaying an appointment with the United States Department of State. The appointment is for "Ryan Kim," and the screenshot lists the RJ Choi Email Account as the email address. The screenshot also identifies "Ryan Kim's" birth date as the same as RYAN JUNGHUN KIM's, and identifies "Ryan Kim's" passport number as the same as RYAN JUNGHUN KIM's.

d. The S. Kim Email Accounts appear to be linked to SUNG HWAN KIM, a/k/a "Sean Kim," the defendant, because, among other things, (i) the accounts contain emails in which the user of the accounts identifies himself as "Sean Kim" or "Sean," (ii) an IP address associated with the accounts was subscribed to SUNG HWAN KIM's spouse, (iii) for one of the accounts, an email in the account lists in the From: field "Sean Kim <sean072@hotmail.com>," and (iv) a bank account used by SUNG HWAN KIM provides one of the S. Kim Email Accounts as the contact email address for the bank account.

e. The Jay Email Account appears to be linked to YOUNG HO JOO, a/k/a "Jay Joo," because, among other things, (i) subscriber information for the account identifies the user as "Jay Joo," and lists JOO's cellular telephone number and place of residence as Bayside, New York; and (ii) the account contains emails signed "Jay Joo," and listing that individual as an executive with a business that JOO operates.

f. The Shin Email Accounts appears to be linked to HYUN JOO SHIN, the defendant, because, among other things, (i) one of the Shin Email Accounts is listed on a social media page for SHIN; and (ii) the Shin Email Accounts contain emails (1) reflecting shipments between in or about August 2014 and April 2015 from an online retailer in SHIN's name and to an address at which SHIN receives mail; and (2) an email from the New York State Department of Finance sent in or about August 2014 concerning parking violations which had been paid using a credit card with the last name "Shin."

g. The Li Email Account appears to be linked to YING AI LI, a/k/a "Sung Soon Kim," the defendant, because, among other things (i) the name "Ying Ai Li" appears in the "From" line of emails sent from the account, and (ii) the account contains an email from an online retailer describing, in substance and in part, a large shipment to "Sung Soon Kim" of approximately 1,000 condoms that were to be delivered to LI's home address. I have reviewed a Hawaii driver's license in the name of "Sung Soon Kim," and an Illinois driver's license in the name of "Ying Ai Li." I have compared the photographs on both driver's licenses, and I believe they depict the same person.

h. The Lee Email Account appears to be linked to HYUN JOO LEE, a/k/a "Rose," the defendant, because, among other things, the Lee Email Account contains emails (i) attaching a flight itinerary for LEE; and (ii) containing a receipt for clothing purchased, which is in LEE's name and addressed to LEE's last known address.

i. The Yun Email Account appears to be linked to SU YEON YUN, a/k/a "Bebe," the defendant, because the Yun Email Account contains emails (i) attaching a bill for Internet service in YUN's name, which matches an address and telephone number provided by YUN on an immigration form; and (ii) concerning correspondence from a financial institution, which was addressed to "Suyeon Yun."

j. The Peterson Email Account appears to be linked to MOOJA PETERSON, a/k/a "MJ," because the account is subscribed to "MJ Peterson," and associated with a telephone number (the "Peterson Number"). The Peterson Number is registered to PETERSON.

k. The Eunjin Email Account appears to be linked to MI SOOK KIM, the defendant, because, among other things, the account contains emails (i) attaching a document which states, in substance and in part, that an individual received \$10,000 from "Misook Kim;" (ii) enclosing a payment reminder for insurance that is addressed to "Mi Sook Kim," and which lists MI SOOK KIM's last known address; and (iii) pertaining to a transaction with EZ-Pass, which is addressed to "Mi Sook Kim," and which states, in substance and in part, that "Mi Sook Kim's" credit card was declined in connection with a recent transaction.

l. The Hello Cutie Email Account appears to be linked to JIN AE JUNG, a/k/a "Jaqueline Kim," a/k/a "Jackie Kim," the defendant, because, among other things, the account contains (i) an email from a provider of cellular telephones concerning the purchase of cellular telephone accessories, which is addressed to "Jackie Kim;" and (ii) an email from a travel vendor that contains a flight itinerary for "Jin Ae Jung."

HAM, KIM, and The Money Pickups

19. Based on my training and experience, my participation in the investigation, my conversations with other law enforcement agents and others, I have learned that CS-1 told law enforcement agents, in substance and in part, that:

a. CS-1 regularly delivered cash proceeds from the brothels to a female that CS-1 described as an older woman.

b. In addition, since at least in or about May 2015, CS-1, on several occasions, made cash payments to a Wells Fargo credit card (the "Wells Fargo Card"), using proceeds from Asian Flower. The Wells Fargo Card is in the name of HOI HAM, the defendant, who, based on law enforcement observation, appears to be an older Korean woman.

20. Based on my training and experience, my conversations with other law enforcement agents and others, and my participation in the investigation, including my review of emails, I know that, using the RJ Choi Email Account, RYAN

JUNGHUN KIM, a/k/a "Ryan Junghun Choi," a/k/a "Ki Soo Choi," a/k/a "Lion King," forwarded a transcript of a KakaoTalk conversation between himself and someone he described as "mom." As set forth above, KIM's mother is HOI HAM, the defendant. That transcript reflects that the following conversations,⁷ in substance and in part, occurred over several days:

February 18, 2015

KIM: You have to take out 865?

HAM: Yes, yes

KIM: Don't just withdraw it. I'll give you a check

KIM: Withdraw using Minji's check.

HAM: Then I just have to *cash out*, right?

KIM: Isn't it?

HAM: [I thought] I have to deposit again.

KIM: No.

KIM: Just deposit it.

HAM: Then *cash out*

KIM: At any rate

KIM: [The Advertising Website] doesn't accept checks anymore

HAM: B donut still, it's not good to deposit

HAM: That would be better than Minji's coming in as cash and going out as cash

⁷ The conversations occurred in Korean. The translations and interpretations set forth in this affidavit are preliminary, and are subject to revision based on further investigation.

HAM: [The Advertising Website] leaves evidence

KIM: Use this as evidence when filing taxes.

KIM: As teaching piano

KIM: Aren't you going to file taxes anymore?

KIM: Mom, then when you renew your passport and your passport number changes, what happens?

KIM: Would the bank ask for it?

HAM: At the Hana Bank below aunt's hospital

HAM: I shouldn't throw out the old one

KIM: Then it won't leave a trace for the U.S. government

KIM: Because when a passport is renewed, the passport number changes

HAM: Yes, yes

KIM: Mom, you should use this account well

KIM: It's good.

HAM: The CPA asked me whether I have overseas assets

KIM: You don't have any, mom

HAM: Under ten thousand dollars

KIM: Yes, yes

HAM: And don't leave more than ten thousand dollars in it

KIM: No

KIM: If you renew your passport later,

KIM: It won't matter then

HAM: Right

HAM: You be careful too

KIM: I'm okay

HAM: You don't have money in your account, right?

KIM: In the account, there's 7000

HAM: Yes, yes

KIM: A lot in stock

HAM: As long as it's not over ten thousand dollars

KIM: but there's no Social, so

HAM: Can they find out about stock ownership as well?

KIM: They can't find out

KIM: Neither can banks

HAM: Do they ask other people for Social?

KIM: The dumb people voluntarily declare and [incomprehensible].

February 21 and 26, 2015

KIM: Mom

KIM: let's have you collect more money

HAM: Okay

KIM: There's no other way

KIM: The rural places can make deposits

KIM: 46th Street and 6th Avenue
Manhattan and

KIM: do Soojung's again and

KIM: Hyunjung's

KIM: I'll give you more money

HAM: Okay

KIM: But go earlier

KIM: Soojung has been making deposits
regularly these days

KIM: but she said that she's good
before 11 o'clock

HAM: Who?

KIM: Soojung

KIM: the one who's been causing
problems

HAM: I'll try that

KIM: Okay

HAM: Is everything agreed upon?

KIM: Not yet for Soojung and 46th
Street

KIM: Because it's Wednesday

HAM: Ok

KIM: Oh, mom, we misunderstood 46th
Street

KIM: Next week, two weeks' worth

KIM: they'll give us

HAM:

Okay

21. Based on my training and experience, my conversations with other law enforcement agents and others, and my participation in the investigation, I know that law enforcement agents conducted surveillance of HOI HAM, the defendant, on several occasions, including:

a. On or about September 16, 2015, law enforcement agents observed HAM collect an object from an individual at Blue Angel. Law enforcement observed HAM subsequently travel, with the object, to her home in New Jersey.

b. On or about September 30, 2015, law enforcement agents observed HAM walking from the vicinity of Blue Angel to VIP Asian.

c. On or about April 6, 2016, law enforcement agents saw HAM enter a building, located at 312 5th Avenue, which contains a brothel identified during the investigation. A short time later, HAM walked to and then entered 38 West 39th Street, which contains a brothel identified during the investigation. A short time later, while HAM was in the vicinity of 48 West 46th Street, the address for Blue Angel, HAM received an envelope from a woman who law enforcement identified as MOOJA PETERSON, a/k/a "MJ," the defendant, which HAM placed in her dark bag. Shortly thereafter, HAM went to 150 East 46th Street, which contains a brothel identified during the investigation. After entering 58 East 56th Street, which contains still another brothel identified during the investigation, HAM traveled to the Port Authority Bus Terminal, where she went to the United States Post Office and engaged in a transaction. Based on law enforcement agents' interaction with the clerk who assisted HAM with this transaction, I believe that HAM purchased two \$1,000 USPS money orders with cash. HAM then went to Duane Reade (also within the Port Authority Bus Terminal), where she engaged in a transaction. While she was waiting in line at Duane Reade, law enforcement agents observed HAM with a large quantity of cash in her hands, which she appeared to be counting. Based on, among other things, law enforcement agents' review of a Duane Reade receipt, I believe that HAM purchased a \$500 Visa gift card with cash. Later that afternoon, HAM was seen entering the building where she lives in New Jersey.

Payments to the Advertising Website

22. Based on my training and experience, my conversations with other law enforcement agents and others, my participation in the investigation, and my review of records, including emails and bank account records, I have learned, among other things, that:

a. Between in or about April 2012 and in or about January 2015, HOI HAM, the defendant, maintained a credit card (the "Ham Credit Card #4352") which received approximately \$205,000 in payments. During this same period, the Ham Credit Card #4352 remitted approximately \$184,587 in payments to the Advertising Website.

b. Between in or about December 2012 and in or about May 2014, HAM maintained another credit card (the "Ham Credit Card #5681") which received approximately \$350,000 in payments on the account. During this same period, the Ham Credit Card #5681 remitted approximately \$326,381 in payments to the Advertising Website.

c. Between in or about December 2012 and in or about January 2015, HAM maintained bank account #XXXX7419 (the "Ham Account #7419"). During this period approximately \$121,880 in cash was deposited into this account. During this same period, the Ham Account #7419 transferred approximately \$108,499 in payments to the Ham Credit Card #5681.

d. Between in or about May 2014 and in or about August 2015, HAM maintained another credit card (the "Ham Credit Card #8936") which received approximately \$268,415 in payments on the account, including cash deposits that occurred in New York, New York. During this same period, the Ham Credit Card #8936 remitted approximately \$200,553 in payments to Advertising Website.

e. Cash deposit slips seized during the Blue Angel Raid show cash deposits into a bank account (the "CC-3 Account"). Between in or about March 2014 and in or about May 2015, the CC-3 Account transferred approximately \$83,160 in payments to Ham Credit Card #4352 and the Ham Credit Card #8936 collectively.

f. Between in or about February 2013 through in or about January 2015, approximately \$14,045 was transferred from accounts delineated as "J. Kim, Jacqueline" (the "Kim Bank Accounts") to the Ham Account #7419. An email dated on or about

October 22, 2014 found in the Hello Cutie Email Account contained a screenshot of an electronic banking application that depicts a log of transactions for a bank account that has an account number that shares the last four digits of one of the Kim Bank Accounts.

g. Between in or about December 2011 and in or about September 2013, SUNG HWAN KIM, a/k/a "Sean Kim," the defendant, maintained bank account #XXXX4669 (the "Sean Kim Account #4669"). During this period, approximately \$150,000 in cash was deposited into this account. During this same period, the Sean Kim Account #4669 remitted approximately \$90,000 in payments to the Advertising Website.

h. Between in or about December 2011 and in or about September 2013, SUNG HWAN KIM maintained bank account #XXXX5825 (the "Sean Kim Account #5825"). During this period, approximately \$186,601 in cash was deposited into this account. During this same period, the Sean Kim Account #5825 remitted approximately \$14,945 in payments to the Advertising Website.

i. In or about February 2015, the RJ Choi Email Account received an email alert from Chase Bank stating, in sum and substance, that another individual ("CC-4") had sent RYAN JUNGHUN KIM, a/k/a "Ryan Junghun Choi," a/k/a "Ki Soo Choi," a/k/a "Lion King," the defendant, payments from a Chase account (the "CC-4 Account"). The CC-4 account was also involved in numerous other transactions involving the defendants and advertising expenses, including, but not limited to:

i. Between in or about January 2014 through in or about April 2015, the CC-4 Account received approximately \$58,280 from an account in the name of HYUN JOO SHIN, the defendant.

ii. In or about May of 2014, the CC-4 Account received approximately \$5,375 from an account (the "Lee Account") in the name of HYUN JOO LEE, the defendant. The Lee Account is maintained at a bank located in New York, New York.

iii. Between in or about January 2014 through in or about April 2015, the CC-4 Account received approximately \$60,266 from an account (the "Li Account") in the name of YING AI LI, a/k/a "Sung Soon Kim," the defendant. The Li Account is held at a bank located in New York, New York. Furthermore, during this same period, there were deposits into the Li Account that were made in New York, New York.

iv. In or about January 2014, the CC-4 Account received approximately \$6,140 from an account for which MI SOOK KIM, the defendant, is the signatory.

v. Between in or about January 2014 through in or about April 2015, the CC-4 Account received approximately \$6,140 from an account in the name of 45 Spa Rainbow (the "Rainbow Spa Account"). Account statements for the Rainbow Spa Account list the address associated with the account as the address for Rainbow Spa. Furthermore, incorporation documentation for Rainbow Spa identified YOUNG HO JOO, a/k/a "Jay Joo," the defendant, as its owner.

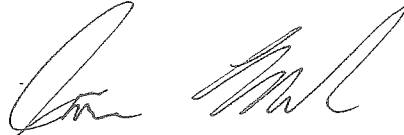
vi. Between in or about January 2014 and in or about April 2015, the CC-4 Account remitted approximately \$51,953 to, among others, Bitcoin. Also during this period, the CC-4 Account transferred approximately \$54,283 to the Ham Credit Card #4352, which, as noted above, made significant payments to the Advertising Website.

j. Between in or about December 2011 and in or about May 2014, approximately \$275,000 was deposited into the Rainbow Spa Account. Also, during this period, the Rainbow Spa Account remitted approximately \$58,426 to the Advertising Website.

k. In or about December 2011 through in or about May 2014, JOO, along with another individual, maintained another bank account (the "Joo Account"). During this period approximately \$268,000 was deposited into this account. Also, during this period, the Joo Account remitted approximately \$92,311 to the Advertising Website.

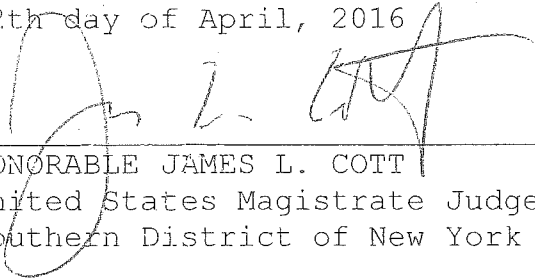
l. On at least seven occasions between in or about June 2014 and in or about March 2015, the RJ Choi Email Account included in sent emails banking information for, among others, the CC-3 Account. In or about June 2014 through in or about March 2015, the CC-3 account received approximately \$10,215 from an account in the name of HYUN JOO LEE, the defendant, who, like SU YEON YUN, a/k/a "Bebe," the defendant, was involved in sending and receiving communications regarding advertising for Blue Angel.

WHEREFORE, the deponent respectfully requests that warrants be issued for the arrests of RYAN JUNGHUN KIM, a/k/a "Ryan Junghun Choi," a/k/a "Ki Soo Choi," a/k/a "Lion King," HOI HAM, SUNG HWAN KIM, a/k/a "Sean Kim," YOUNG HO JOO, a/k/a "Jay Joo," MI SOOK KIM, SU YEON YUN, a/k/a "Bebe," HYUN JOO LEE, HYUN JOO SHIN, YING AI LI, a/k/a "Sung Soon Kim," JIN AE JUNG, a/k/a "Jaqueline Kim," a/k/a "Jackie Kim," and MOOJA PETERSON, a/k/a "MJ," the defendants, and that they be arrested and imprisoned or bailed, as the case may be.



JUSTIN ELLARD
Special Agent
U.S. Department of State -
Diplomatic Security Service

Sworn to before me this
12th day of April, 2016



HONORABLE JAMES L. COTT
United States Magistrate Judge
Southern District of New York