

**AFFIDAVIT OF SPECIAL AGENT ZACHARY MITLITSKY IN SUPPORT OF
APPLICATION FOR COMPLAINT**

I, Zachary A. Mitlitsky, having been sworn, state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with United States Department of Homeland Security (“DHS”), Homeland Security Investigations (“HSI”) and have been so employed since August 2020. I am currently assigned to the Office of the Special Agent in Charge (SAC), Boston, Massachusetts. I am authorized to investigate crimes involving violations of Title 8, Title 18, and Title 19 of the United States Code (“USC”). I am a graduate of the Federal Law Enforcement Training Center (“FLETC”) in Glynco, Georgia, where I received training to become a Special Agent; specifically, I have received certifications from the Criminal Investigator Training Program in February 2021 and from the HSI Special Agent Training Program in May 2021. I am currently assigned to the Human Smuggling and Trafficking Unit, where I facilitate interstate and international human trafficking investigations. Prior to my tenure as a Special Agent, I served as a Uniformed Division Officer with the United States Secret Service.

2. As a Special Agent, I investigate human trafficking, human smuggling, drug trafficking, financial crimes, and related offenses and assist in the execution of search and arrest warrants during these investigations. Many of these investigations have had national or international connections, and many required me to work closely and share information and intelligence with members of other federal, state, and local law enforcement agencies. I have debriefed, and continue to debrief, defendants, informants, and witnesses who have personal knowledge about human trafficking, including sex trafficking, and other crimes occurring in Massachusetts, nationally, and abroad. I have conducted investigations related to the financial crimes associated with human trafficking and have reviewed and analyzed financial records in such investigations. As such, based on my training and experience, I have become familiar with

the methods, routines, and trends in human-trafficking, including methods used by human traffickers to acquire, conceal, and launder proceeds from these crimes. I am also familiar with the methods that human traffickers (both local and international “pimps”) use to recruit, entice, transport, harbor, smuggle, and arrange for victims to participate in commercial sex acts for the traffickers’ financial benefit.

3. I am currently involved in an investigation of a group of individuals involved in using a facility of interstate commerce in furtherance of prostitution offenses (the “Travel Act”), in violation of 18 U.S.C. § 1952; transporting individuals in interstate or foreign commerce with the intent that such individuals engage in prostitution or other criminal sexual activity, in violation of 18 U.S.C. § 2421; persuading, inducing, enticing, or coercing individuals to travel in interstate or foreign commerce to engage in prostitution or other criminal sexual activity, in violation of 18 U.S.C. § 2422; wire fraud, in violation of 18 U.S.C. § 1343; money laundering, in violation of 18 U.S.C. §§ 1956(a)(1) and 1957; structuring, in violation of 31 U.S.C. § 5324; and conspiracy to commit such offenses, in violation of 18 U.S.C. §§ 371 and 1956(h).

PURPOSE OF AFFIDAVIT

4. This affidavit is being submitted in support of a criminal complaint against the following individuals:

- a. Han Lee, a/k/a “Hana,” of Cambridge, Massachusetts (“HAN”);
- b. James Lee, of Torrance, California (“JAMES”); and,
- c. Junmyung Lee, of Dedham, Massachusetts (“JUNMYUNG”),

charging that from beginning on a date unknown, but at least in or about July 2020 and continuing until the present, each did knowingly and willfully conspire with each other and others known and unknown to commit offenses against the United States, to wit, to knowingly persuade, induce, entice, and coerce one or more individuals to travel in interstate or foreign commerce to engage in

prostitution, or in any sexual activity for which any person can be charged with a criminal offense, in violation of 18 U.S.C. § 2422, all in violation of 18 U.S.C. § 371.

5. This affidavit does not set forth all the facts developed during the course of this investigation. Rather, it sets forth only those facts that are necessary and sufficient to establish probable cause to believe that the defendants identified herein have committed and will continue to commit the offense described in paragraph 5, and that evidence, fruits, and instrumentalities of the offenses described in paragraph 33 will be found in the above-described Target Locations.

6. This multiyear investigation has uncovered, as described in more detail below, that the co-conspirators were advertising women for commercial sex via at least two different websites on the internet, under the guise of professional nude photo shoots, and established brothels in order to facilitate the engagement of commercial sex. One of the websites focused its advertising in the Boston area and directed customers to one of several different Boston area brothels (Target Locations 4 through 7), while another website advertised in the eastern Virginia area and directed customers to one of two known brothels in eastern Virginia (Target Locations 8 and 9). I believe that HAN and JUNMYUNG maintained the day-to-day operations of the Massachusetts brothels and that HAN maintained the day-to-day operations of the Virginia ones. I believe these operations include, but are not limited to, checking in on the brothels and women staying in and working at them, arranging for transport for the women to and from brothels and airports, assisting the women with luggage upon arrival, providing groceries to the women, collecting prostitution proceeds, and depositing those proceeds in bank accounts or exchanging them for money orders. I also believe that HAN and JUNMYUNG each hold brothel leases in their own names. I believe that JAMES opened leases in his name, and in the identity of others, so as to insulate the other brothel owners from the illicit activity occurring inside the brothels.

7. Members of law enforcement have participated in the below described investigation

since at least summer of 2020. I am familiar with the facts and circumstances of this investigation based on information I have received from a variety of sources, including my own participation in the investigation, oral and written reports made to me by other law enforcement officers, physical and video surveillance, public records, business records, financial and other subpoenaed records, court-authorized cell-phone location information, and witness interviews. Statements of my beliefs interpreting the evidence and events described herein come from my training and experience, and the collective training and experience of my colleagues, investigating human trafficking offenses. All times are approximate.

RELEVANT LOCATIONS

8. This affidavit discusses evidence related to the following locations:
 - a. 80 Cambridgepark Drive, Unit 638, Cambridge, Massachusetts, 02140 (the “Han Lee Residence” or “Target Location 1”);
 - b. 71 Legacy Boulevard, Unit 207, Dedham, Massachusetts 02026, also known as 920 Providence Highway, Unit 207, Dedham, Massachusetts 02026,¹ which is part of the apartment building, Residence at the Dior (the “Junmyung Lee Residence” or “Target Location 2”);
 - c. 1031 Park Circle Drive, Torrance, California, 90502 (the “James Lee Residence” or “Target Location 3”);
 - d. 90 Fawcett Street, Unit 109, Cambridge, Massachusetts, 02138 (“90 Fawcett, Unit 109” or “Target Location 4”);
 - e. 90 Fawcett Street, Unit 435, Cambridge, Massachusetts, 02138 (“90 Fawcett, Unit 435” “Target Location 5”);

¹ This apartment building is located on the corner of an intersection. There are entrances and parking entrances on both 920 Providence Highway (Route 1) and 71 Legacy Boulevard.

- f. 90 Fawcett Street, Unit 530, Cambridge, Massachusetts, 02138 (“90 Fawcett, Unit 530” or “Target Location 6”);
- g. 66 Bond Street, Unit 221, Watertown, Massachusetts, 02472, which is located in an apartment complex known as “Blvd & Bond” (“66 Bond” or “Target Location 7”);
- h. 2985 District Avenue, Unit 245, Fairfax, Virginia, 22031, which is in an apartment complex known as the Avalon Mosaic Apartments (“2985 District, Unit 245” or “Target Location 8”); and,
- i. 1500 Westbranch Drive, Unit 649, Tysons, Virginia 22102, which is in an apartment complex known as Hanover Tysons (“1500 Westbranch, Unit 649” or “Target Location 9”).

These locations are referred to collectively herein as the “Target Locations.”

SUMMARY OF EVIDENCE

I. Overview of Interstate Prostitution Network

9. From at least July 2020, the co-conspirators identified in paragraph 4 have operated an interstate prostitution network with multiple brothels in greater Boston and eastern Virginia. The targets advertise their prostitution network primarily on two websites: www.bostontopten10.com and www.browneyesgirlsva.blog. Both websites advertise appointments with Asian women in either greater Boston (www.bostontopten10.com) or eastern Virginia (www.browneyesgirlsva.blog). Although www.bostontopten10.com claims “it is expressly not a site that in any way solicits, encourages, nor sanctions any sexual activity” and www.browneyesgirlsva.blog claims “[t]his site does not promote prostitution nor is this advertisement or any content therein an offer for prostitution,” both sites do in fact promote and advertise prostitution. Several women have been advertised on more than one of the above-

described websites, as they traveled from city to city within the prostitution network.

10. Each website describes the process that a “client” must undertake to book appointments with the advertised women. The process is similar for both websites. Typically, first-time clients are required to complete a form on the websites. For www.bostontopten10.com, the form includes the clients having to provide their names, email address, phone number, employer, and reference if they have one. For www.browneyesgirlsva.blog, clients also are expected to fill out a verification form as a first-time customer and are instructed to contact one of two phone numbers listed on the website. After their information is verified, the clients can book appointments. Further communication about the appointments – e.g., time, duration, location, and other logistics – generally occurs via text message exchanges with telephone numbers provided on or associated with the websites.² More specifically, once the information is verified, the sex customer receives a text message from phone numbers associated with the brothels. In the alternative, clients also can be verified through their “TerID” or through “Preferred 411.” Based on my training and experience, I am aware that “TerID” refers to an identification assigned to commercial sex workers and to VIP members of a website titled www.TheEroticReview.com, which provides clients with, among other things, access to reviews and lists of and allow searches for commercial sex workers. Likewise, I am aware that “Preferred 411” refers to a website titled www.preferred411.com³ in which a customer is directed to complete the “P411 New Client Application” to obtain a “Preferred411 Membership.” The membership application requires a new

² As described below, www.browneyesgirls.blog lists two different phone numbers for sex buyers to contact for services whereas, once verified, the sex buyer who submitted the survey on the www.bostontopten10.com website receives a text message from a phone number tied to the Boston Brothel.

³ The bottom of the website www.preferred411.com indicates the site is maintained by a company based in Palma de Mallorca, Spain.

customer to input personal identifying information, not limited to, full name, birthdate, credit card information, employer information, and websites. As of October 31, 2023, a “Preferred411 Membership” costs \$119 for the first six months. Membership renewal rates were offered at varying price points, including \$59 per month for one month and \$179 per year.

11. Approximately twenty (20) sex buyers were interviewed in connection with this multi-yearlong investigation. Those men described arranging to meet at various locations, including some of the Target Locations, as described below, for the purpose of engaging in commercial sex. Many of those buyers (or “sex customers”) of this prostitution ring who were interviewed by law enforcement stated that for a typical encounter with one of the commercial sex workers, they went to a specific apartment as directed by text messages from the phone number tied to the website they visited. One such customer (Customer A) described being directed to a specific apartment, Target Location 4, where the customer received a text of a “menu” of available options at the brothel. This menu lists the women available, the sexual services available, and the hourly rate. Below is an example of a “menu” text sent by the phone number associated with www.bostontopten10.com to a sex buyer:

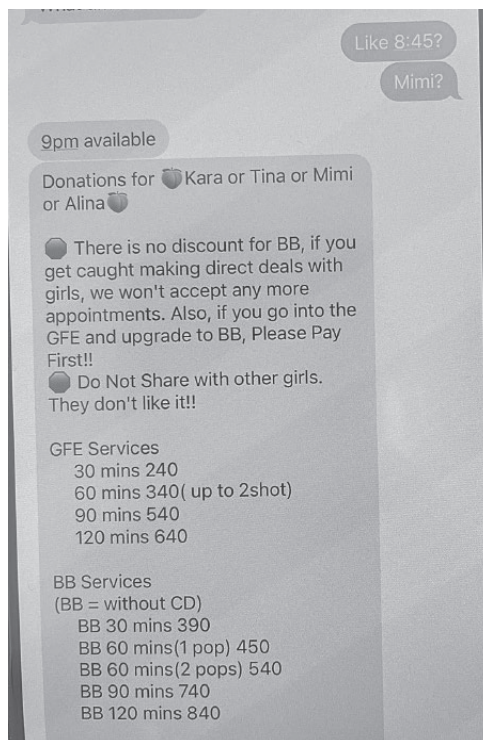


Figure 1: Text Message with Boston Brothel Phone

12. As depicted above, women nicknamed “Kara,” “Tina” and “Mimi” were offered to the Customer A). I am aware that the reference above to “BB” is a term in the prostitution industry that refers to sex without a condom, as evidenced by the Boston Brothel Phone clarifying in its subsequent text of “(BB = without CD)”. I am also aware that “GFE” refers to “GirlFriend Experience” which provides a more intimate experience and blurs the boundaries between a financial transaction and a romantic relationship. Generally speaking, when the customers arrived at the apartment unit, they did not knock; the door was opened by an Asian female inside who was expecting them. Typically, the Asian female who opened the door was the individual they made the appointment to meet. The customers provided a cash payment (in an amount confirmed in an earlier text message with the brothel phone,⁴ usually based on the duration and

⁴ The phone numbers posted on the advertisement that sex buyers were directed to contact were associated with particular cellular devices, hereinafter collectively called the “Brothel Phones,” that are described in greater detail below.

type of service) to the Asian female in the apartment. The customers removed their shoes and were escorted by the Asian female to the bedroom, where the customers undressed, and were accompanied into an attached bathroom. There, they were offered to use mouthwash; they were offered a shower with or without the Asian female⁵; and they then returned to the bedroom to engage in sex with that female using a condom that she provided. Those customers were directed to various locations included Target locations 4-9 to engage in commercial sex in exchange for money. Based on listed hours on both websites, I am aware that the brothels offer commercial sex for a fee, in violation Massachusetts General Law chapter 272 § 53A and Virginia Code Article 3 § 18.2-346, from 10:30 a.m. through 10 p.m. every day of the week.

13. Based on my training and experience, I believe that both the Boston and the Virginia brothels are high-end because of the high cost associated with the rental units, the location of the rental units, as well as the scope of the professional disciplines of the sex buyers. Additionally, based on my training and experience, the price for commercial sex for a fee, which ranges from approximately \$350 to upwards of \$600 per hour depending on the different services, suggests that customers are paying a premium price compared to standard rates for commercial sex being offered in the area. Throughout the course of our investigation, and as detailed below, agents have identified several customers through surveillance, phone records, customer interviews, and other investigative methods. These customers spanned a wide array of different professional disciplines. Some of these professional disciplines included, but are not limited to, politicians, pharmaceutical executives, doctors, military officers, government contractors that possess security clearances, professors, lawyers, business executives, technology company executives, scientists, accountants, retail employees, and students. This list only encompasses a small sample of known

⁵ Most of the men then showered again with or without the Asian female before leaving the apartment unit.

customers that have been identified through investigative methods. I believe there are potentially hundreds of yet to be identified customers that may include other professional disciplines not included in the list above. As detailed below, the customers or sex buyers described within this affidavit are not named. I do not do this for purposes of maintaining their anonymity, but instead do so because our investigation into their involvement in prostitution is active and ongoing.

A. Boston Area Brothels Are Advertised at www.bostontopten10.com (“Boston Top 10”)

14. The website www.bostontopten10.com purports to advertise nude models for professional photography at upscale studios. However, based on my training and experience and knowledge of this investigation and as described below, I believe that the advertisement for photographing nude models is in fact a front for escort services and/or commercial sex services or prostitution offered through appointments booked on the website. On the opening page of a website⁶ is a photograph of a semi-nude female Asian model and the text: “Here to serve our wonderful Boston friends...About Contact Prefer Please... Your character is in your writing... Please Don’t Knock on the Door!! Be on time Us can’t Guarantee Your Wasted Time.” The website further states: “WARNING! This site contains sexually explicit adult material intended for individuals 18 years of age or old. If you are not yet 18, if adult matereial [sic] offends you, or if you are acessing [sic] thios [sic] site which is hosted outside the United States from ny [sic] country or locale where adult material is prohibited by law, PLEASE LEAVE!. This is a site created soley [sic] to expose nude models to professional photographers interested in hiring them for modeling gigs. It is expressly not a site that in any way solicits, encourages, nor sanctions any paid sexual activity. Site created for entertainment purposes only.” The website also lists the

⁶ I have viewed this website and the content occasionally changes. The content described herein was last viewed on October 30, 2023.

height, weight and bust size of multiple Asian women available for appointments and depicts nude and/or semi-nude photographs of each. The women available for sale on the website are updated frequently. For example, on January 15, 2023, the website contained measurements for and nude and/or semi-nude photographs of “Dana,” “Vera,” “Roya,” and “Minky.” On June 3, 2023, the website contained measurements for and nude and/or semi-nude photographs of “Dana,” “Gisella,” “Minhee,” and “Tiki.” On October 4, 2023, the website contained measurements for and nude and/or semi-nude photographs of “LA Sera,” “East Rose,” “Jiwoo,” and “Phila.” On October 30, 2023, the date of the screenshot depicted in *Figure 2* below, the website contained measurements for and nude and/or semi-nude photographs of “U-mi,” “Sora,” “Celine,” “Ayla,” and “Joann.”

15. The website describes the process a user must undertake to book appointments with Boston Top 10. “Verification form for 1st time photographers” and “P411 Id or Ter Id Welcome.” I do not believe that the “customers” are “photographers,” but instead I believe this is in reference to men purchasing sex for the first time on the Boston Top 10 website. The website then depicts a survey to be filled out by the customer. Agents have spoken to customers of Boston Top 10 who have collectively indicated the verification process includes responding to a survey, submitting a “selfie” photo and/or a driver’s license photo, and submitting credit card information. The customers collectively have indicated that, once verified, they receive a text from phone number of [REDACTED]-5147 (hereinafter, “Boston Brothel Phone”) to communicate with to arrange for appointment. Specific instructions, including the location of the appointment, are included in the communications with the Boston Brothel Phone. These men then paid for sex with women advertised on the website at multiple Cambridge brothel locations and a Watertown location, including, but not limited to the following apartments:

- 87 New Street, Unit 206, Cambridge, Massachusetts. HAN Lee leased this apartment from February 2018 through February 28, 2021 and paid for the rent

and/or utilities for it using structured United States Postal Service (“USPS”) money orders. Boston Top Ten no longer uses this location for prostitution.

- 160 Cambridgepark Drive, Unit 376, Cambridge, Massachusetts. HAN leased this apartment until July 2020. Tied to the lease for this apartment was the same phone number used for the lease of 87 New Street, Unit 206 (listed above) and an email address of [REDACTED]@naver.com which I know to be the email address listed as contact information with the service provider for the account holder of www.bostontopten10.com.
- 90 Fawcett Street, Unit 232, Cambridge, Massachusetts. This apartment was leased until June 2021 with a listed email address known to be associated with the Boston Brothels.⁷ The forwarding address listed with this apartment is Target Location 7, that is, 66 Bond Street, Unit 221. Boston Top Ten no longer uses this location for prostitution.
- 77 New Street, Unit 210, Cambridge, Massachusetts. This apartment is located in an apartment building called “Park 77.” JAMES Lee leased this apartment from May 26, 2021 through May 31, 2022. Boston Top Ten no longer uses this location for prostitution.
- 90 Fawcett, Unit 109 (Target Location 4). Boston Top Ten (specifically, HAN Lee) moved a portion of the prostitution business from 77 New Street, Unit 210 to Target Locations 4 and 5 (as described below) in late June/early July 2022. As described below, JAMES Lee has leased Target Location 4 since January 2022. Boston Top Ten continues to use this, and Target Locations 5 through 7, for prostitution

⁷ The name of the lessee is known to investigators, but is not being disclosed at this time.

according to, among other things, our surveillance, sex buyer interviews and an analysis of phone and other records.;

- 90 Fawcett, Unit 435 (Target Location 5). Boston Top Ten is believed to have moved a portion of the prostitution business from 77 New Street, Unit 210 to Target Locations 4 and 5 in late June/early July 2022. As described below, JUNMYUNG Lee has leased Target Location 5 since June 2022, and Boston Top Ten continues to use this location as a brothel.
- 90 Fawcett, Unit 530 (Target Location 6). HAN Lee has leased Target Location 6 since April 2023, and Boston Top Ten continues to use this location as a brothel.
- 66 Bond, Unit 221 (Target Location 7), located in a building known as “Blvd & Bond.” JAMES Lee, using the identity of L.K., has leased Target Location 7 since August 2022, and Boston Top Ten continues to use this location as a brothel.

16. Images of the www.bostontopten10.com landing page and “About us” page from October 30, 2023, are shown in Figures 2 and 3 below:⁸

⁸ I have redacted portions of the semi-nude photographs of the women depicted on the two prostitution websites in order to protect the identities of the women.



Figure 2: Screenshot of landing page



Figure 3: Screenshot of "About Us"

17. As depicted in Figure 3, the website lists times of services as “30 min;” “1 hour/1rd/2rd;”⁹ and, “1 hour 30min.” The site typically advertises the services of three to five Asian women at any given time, though there are periods when less or more women are advertised. Women who have appeared on www.bostontopten10.com have also appeared on

⁹ Based on my training and experience, I believe that “1 hour/1rd/2rd” is code for payment for one hour of sexual services for “one round” or “two rounds” of ejaculations.

www.browneyesgirlsva.blog suggesting that they have travelled between the Massachusetts and Virginia brothels. Some women advertised on Boston Top Ten's website have their "TerID" number listed on the website as well. As described above, I know that a TerID number is assigned to commercial sex workers and to customers on the website TheEroticReview.com and that upon entering a search term of the TerID number on TheEroticReview.com's website, it will generate the customer and/or commercial sex worker's information. For example, on October 30, 2023, "Sora," was listed on www.bostontopten10.com as one of the women available for services. Sora's TerID also was listed, and after typing Sora's TerID number into a search on TheEroticReview.com's website, I was able to locate additional information related to Sora, including the Boston Brothel Phone number, the different cities she services (both Boston, MA and Los Angeles, CA) and an additional description of Sora's appearance. Available to TheEroticReview.com's paying/VIP members only was additional information related to Sora, including "Services Offered," "Cost of Service," and "Reviews." Some customers of Boston Top 10 interviewed by law enforcement indicated that they learned of the Boston brothels, the women advertised on Boston Top 10, and the associated Boston Brothel Phone number through searches conducted for prostitution services on the forum TheEroticReview.com.

B. Virginia Area Brothels Are Advertised at www.browneyesgirlsva.blog ("Brown Eye Girl")

18. The website www.browneyesgirlsva.blog purports to advertise nude models for professional photography at upscale studios. However, I believe that the advertisement for photographing nude models is in fact a front for escort services and/or commercial sex or prostitution offered through appointments booked on the website. On the landing page of the website is a photograph of a semi-nude female Asian model and the text: "DISCLAIMER This site contains adult-related material. If you are under 18 years of age or if it is illegal to view adult material in your jurisdiction, please leave now." The website further states: "NO sexual activities

are implied or condoned by the creator(s) of this website. This site does not promote a prostitution nor is this advertisement or any content therein an offer for prostitution. Money exchanged is for companionship only and anything beyond that is a choice made between two consenting adults and not contracted for by the site or its creator(s). Under no circumstances does the website owner, the website builder software, its staff, or affiliates consent to or has knowledge of any illegal activity committed by anyone associated with this website.”

19. The landing page contains a similar warning/disclaimer that was posted on the Boston Top Ten website. The website www.browneyesgirlsva.blog nonetheless does, in fact, promote prostitution in at least two Target locations in Virginia: 2985 District Unit 245 (Target Location 8) and 1500 Westbranch Drive, Unit 649 (Target Location 9). The landing and menu pages, as of October 30, 2023, are shown in Figures 4 and 5 below:

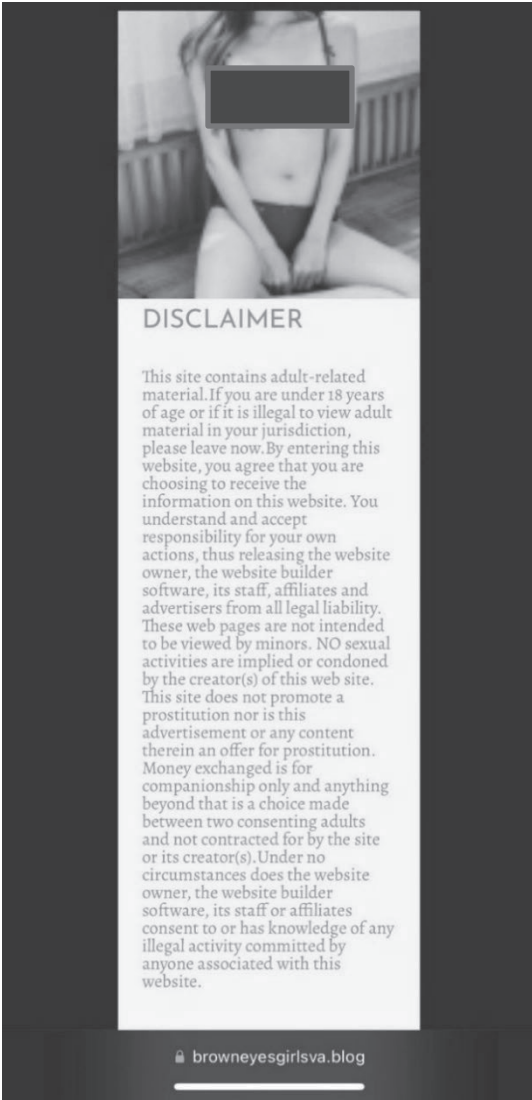


Figure 4: Screenshot of landing page



Figure 5: Screenshot of Menu

20. Like Boston Top Ten, the Brown Eye Girl website also lists the height, weight and bust size of multiple Asian women available for appointments and depicts nude and/or semi-nude photographs of each. The women available on the website are updated frequently. For example, on June 3, 2023, the website contained measurements for and nude and/or semi-nude photographs of “Haruka.” On October 20, 2023, the website’s contained measurements for and nude and/or semi-nude photographs and listed: “Fia-K”, “J.Naru/Hanako”, “La Sera” and “Rainbow Open 10/18.” Based on this, I believe that these were the women available for commercial sex for a fee on the date of October 20, 2023. I further believe that the website listed: “Rainbow Open 10/18”

because a woman who goes by “Rainbow” would become available for sexual services at the brothel starting on October 18, 2023. On October 30, 2023, the website listed, “Candycrush 10/29 open,” “Duo Open 10/26,” “Gold,” “Silver,” and “Ms Soon.” A photograph associated with the page for “Duo Open 10/26” showed two semi-nude Asian women posing together and listed “Silver & Gold.” Because women named “Silver” and “Gold” appeared as available women on the website, I believe Brown Eye Girl’s website’s reference to “Duo Open 10/26” and “Silver & Gold” was an offer for appointments to engage in sex acts with two women who go by the names of “Silver” and “Gold.”

21. Like Boston Top Ten, the browneyesgirlsva.blog website describes the process the user must undertake to book an appointment and states: “Verification form for 2st (sic) time”; “Recommendation”; and “P411 Id or Ter Id Welcom!! (sic).” The website also lists times of services as “30 min”; “1 hour/1C/2C”; and “1 hour 30 min.”¹⁰ As of June 3, 2023, the website lists two different phones numbers to contact for services, including [REDACTED]-8262 (hereinafter, “Virginia Brothel Phone 1”) and [REDACTED]-2277 (hereinafter, “Virginia Brothel Phone 2”) on its landing page. The website typically advertises one to five or six women at a time. Beginning midway into September 2023, the website began advertising more women at a time which led investigators to believe that it operated more than one brothel location.

22. Agents have spoken to individuals who made appointments and paid for sex with women advertised on www.browneyesgirlsva.blog in the Virginia brothel locations. One of the men paid for sex on October 26, 2023. That same individual had previously contacted Virginia Brothel Phone 1 to arrange for sex with a woman advertised on the website in exchange for money at 2985 District Ave Unit 245 (Target Location 8). Acting under the direction of law enforcement,

¹⁰ Based on my training and experience, I believe that “1 hour/1C/2C” is code for payment for one hour of sexual services for (the slang word for) either one ejaculation or two ejaculations.

this individual scheduled an appointment through www.browneyesgirlsva.blog for October 27, 2023 (that is, the following day). Through text messages with Virginia Brothel Phone 1, this individual was directed to Target Location 9, but cancelled the appointment at the last minute as directed by law enforcement. On October 27, 2023 at around 3:28 p.m., investigators observed a man enter the front doors of 1500 Westbranch Drive and press the number :6” on the elevator. At around 4 p.m., the same man exited 1500 Westbranch Drive. Agents spoke with him and learned that he utilized the website www.browneyesgirlsva.blog and selected an advertisement for “Ms Soon” and texted the phone number listed on the website. At the time, agents were aware that “Ms Soon” was available on the website. The customer submitted a picture of his driver’s license, a “selfie,” and his LinkedIn profile for verification purposes. He agreed to a thirty (30) minute appointment in exchange for \$200 in cash. He arrived at 1500 Westbranch, went up to the 6th floor and entered unit 649 (Target Location 9) where he received a massage and manual manipulation until ejaculation in exchange for cash. The customer indicated that the sex worker tried to “upcharge” him and offered vagina intercourse, which he declined. He previously utilized the services of www.browneyesgirlsva.blog a year prior and visited an apartment in the “Mosaic District in Fairfax, VA,” which I believe to be Target Location 8.

C. Multiple commercial sex workers were advertised for appointments in both Boston and Virginia.

23. Several women have been advertised on more than one of the two above-described websites, including “Cream,” and “Mina,” and several others. For example, I have viewed TheEroticReview.com’s profile associated with “Mina” which lists an advertisement website of: <http://bostontopten10.com/██████████> and a blog website of: <https://browneyesgirlsva.blog/soon-8-10->

█████.¹¹ Also listed on the same profile are two phone numbers, one that I know is used to communicate with sex customers of Boston Top Ten and the other listed on the Virginia brothel's website of Brown Eye Girl. Based upon this, I believe that "Mina" travels between Boston and Virginia to engage in commercial sex for money on behalf of these brothels given that she is posted on both websites. Based on our extensive surveillance and witness interviews, I believe that if a female is posted on the www.browneyesgirlsva.blog website, they are available for commercial sex at the Virginia locations and if on www.bostontopten10.com they are available at one of the Massachusetts locations.

24. Although the names are believed to be aliases, and the pictures do not necessarily depict the actual women working as commercial sex workers, women working for this prostitution ring do, in fact, move from city to city as advertised. For example, a customer in Cambridge informed law enforcement that he paid for sex with a woman named "Cream" advertised on www.bostontopten10.com in mid-December 2022; separately, a customer in Virginia informed law enforcement that he paid for sex with a woman named "Cream" advertised on www.browneyesgirlsva.blog in mid-January 2023.

25. The movement of women from city to city is consistent with statements on the websites that various advertised women are "open" or "coming soon." Additionally, as described in more detail herein, based upon surveillance of different brothel locations coupled with a review of records for commercial airline tickets, I believe the women who are advertised on the www.bostontopten10.com and www.browneyesgirlsva.blog fly to different states, not limited to Massachusetts and Virginia, to engage in prostitution on behalf of these websites and prostitution networks, which I believe are run and maintained by the targets herein and other similar

¹¹ I believe the listing of "█████-open" referred to "Mina" traveling to the Virginia brothel to be able to work for sex beginning on August 10, 2023.

prostitution websites and networks.

II. Overview of Individuals and Target Locations

26. Han LEE, 41, resides at 80 Cambridgepark Drive, Unit 638, Cambridge, MA (Target Location 1). HAN was born in Korea and first came to the United States in October 2014. She acquired a visitor's visa but subsequently overstayed the length of the visa. HAN applied for permanent residency in the United States in approximately September 2019, when she represented to immigration authorities that she married a United States citizen, M [REDACTED] B [REDACTED]. One brothel location, located at 90 Fawcett Street, Unit 530, Cambridge, MA (Target Location 6), is listed in HAN's name. However, HAN manages brothel locations at 90 Fawcett Street, Unit 109 (Target Location 4), 90 Fawcett Street, Unit 435 (Target Location 5), 66 Bond Street, Unit 221 (Target Location 7), and 2985 District Avenue, Unit 245 (Target Location 8). HAN was seen at all the above listed locations picking up and dropping off females, dropping off supplies, and managing the units. HAN has been observed at Western Union and the United States Post Office on several occasions, both on video and in person, exchanging cash for money orders in increments equal to and less than \$1000, which I believe is in an effort to avoid reporting requirements.¹² Based on precise location information described herein for both Boston Brothel and Virginia Brothel Phones, I believe that HAN regularly communicates with customers and arranges appointments for commercial sex on behalf of the brothel websites.

27. James LEE, 68, resides at 1031 Park Circle Drive, Torrance, CA (Target Location 3). JAMES has utilized his own name, biographical information, bank account information, and identity to sign a lease at 90 Fawcett Street, Unit 109, Cambridge, MA (Target Location 4), and 2985 District Avenue, Unit 245, Fairfax, VA (Target Location 8). JAMES has also submitted

¹² As described below, the reporting requirements for money orders are actually in fact at a threshold of \$3,000.

fraudulent identification documents in other identities, including L ■■■ K ■■■ and J ■■■ G ■■■ W ■■■, to be the lessee at 66 Bond Street, Unit 221, Watertown, MA (Target Location 7) and at 1500 Westbranch Drive, Unit 649, Tysons, VA (Target Location 9), respectively. JAMES has flown commercial airlines from California to Massachusetts and to Virginia in order to sign leases for and conduct walk throughs of the apartment units associated with the brothels in those locations. Based on the investigation, I believe that JAMES collects approximately \$1000 per month per apartment lease that he places in his identity (or his fraudulent identities) as a form of payment from the prostitution business.

28. Junmyung LEE, 30, resides at 71 Legacy Boulevard, Dedham, MA (Target Location 2). JUNMYUNG was born in Korea and began his F1 student visa process in January 2018 to attend the Computer Systems Institute in Boston, MA. Since at least approximately June 2022, JUMYUNG began working with HAN and used his name, biographical information, bank account information, and driver's license to apply for and sign a lease at one brothel location, located at 90 Fawcett Street, Unit 435 (Target Location 5). JUNMYUNG has been observed during surveillance assisting the commercial sex workers with their luggage and groceries when they arrive at and leave the Boston brothel locations and is believed to collect prostitution proceeds from the brothel units and deposit them in U.S. bank accounts. JUNMYUNG was also observed driving females between brothel units and based on precise location information for phones associated with the Boston and Virginia brothel phone numbers, is believed to regularly manage and hold the brothel telephones to communicate with customers. JUNMYUNG is believed to communicate and set up appointments with the sex customers and the women advertised on both the Virginia Brothel and the Boston Brothel websites.

29. 90 Fawcett Unit 109 (Target Location 4) is a Boston brothel where Asian women advertised on www.bostontopten10.com engage in sex for money.

30. 90 Fawcett Unit 435 (Target Location 5) is a Boston brothel where Asian women advertised on www.bostontopten10.com engage in sex for money.

31. 90 Fawcett Unit 530 (Target Location 6) is a Boston brothel where Asian women advertised on www.bostontopten10.com engage in sex for money.

32. 66 Bond Street Unit 221 (Target Location 7) is a Boston brothel where Asian women advertised on www.bostontopten10.com engage in sex for money.

33. 2985 District Unit 245 (Target Location 8) is a Virginia brothel where Asian women advertised on www.browneyesgirlsva.blog engage in sex for money.

34. 1500 Westbranch Unit 649 (Target Location 9) is a Virginia brothel where Asian women advertised on www.browneyesgirlsva.blog engage in sex for money.

35. There are other members of the conspiracy, known and unknown to law enforcement, who participate in the activities described in this Affidavit. And each of the named members of the conspiracy participated in additional activities other than those outlined in this Affidavit.

III. Representative Actions in Furtherance of the Conspiracy

36. As described herein, I believe that the co-conspirators collectively set up the infrastructure for the brothels in multiple states to persuade, induce and entice the women to travel to engage in prostitution. More specifically, the co-conspirators established and maintained the websites advertising the women, the local brothel phone numbers used to communicate with customers to arrange for commercial sex for a fee, the high-end apartments where the women engaged in the commercial sex with customers and stayed overnight during their “tour” in a specific city, and the transportation to and from airports and brothel locations.

A. Han Lee leased multiple current and former brothel locations in the Boston area, including Target Location 6.

37. HAN has leased several apartments in Cambridge where she and her co-

conspirators run brothels. On February 20, 2018, HAN entered into a lease for 87 New Street, Unit 206, in Cambridge, Massachusetts. That lease was renewed on February 1, 2019 and again on March 1, 2020 with a lease end date of February 28, 2021. For this apartment's lease, HAN provided her email address of [REDACTED]@gmail.com and phone number as [REDACTED]-7065. Additionally, rent and/or utilities for this address were paid for using structured USPS money orders, which is consistent with the pattern and method of payments for rent and utility used by HAN for her own residence and more importantly, other brothel locations. HAN also leased an apartment at 160 Cambridgepark Drive, Unit 376 in Cambridge until July 2020. This apartment's lease had a phone number associated with it of [REDACTED]-7065 and had an email address associated with it as [REDACTED]@naver.com, which, as detailed below, is the same email address on file with the service provider of the www.bostontopten10.com website.

38. More recently, on April 3, 2023, HAN leased an apartment at 90 Fawcett Street, Unit 530 (Target Location 6) which is used in as a brothel for her prostitution network. The rent for the unit was set at \$2728 and the lease end date is July 4, 2024. On the lease application, HAN listed her employer's phone number as [REDACTED]-7065, that is, the same number that she listed as her own on leases tied to 87 New Street, Unit 206, and 160 Cambridgepark Drive, Unit 376. The phone number on file with the rental company for HAN was [REDACTED]-6130, which I know to be the phone number used by HAN recently during the course of this investigation. Rent payments for this apartment have been made in the form of USPS and Western Union money orders, all in values of \$1000 or less. On the lease, HAN indicated she was the sole occupant of this apartment to be used for residential purposes. However, investigators are aware that 90 Fawcett, Unit 530 is used by the prostitution business as yet another brothel location. For example, on July 21, 2023, around 12:25 p.m., investigators observed HAN arrive at 90 Fawcett Street in a rideshare vehicle and enter the building. Investigators observed HAN enter unit 530 shortly thereafter. At around

12:58 p.m., investigators observed a white male from a black Range Rover enter 90 Fawcett Street and then enter unit 530 at around 1:00 p.m. At around 1:37 p.m., an investigator observed that same white male exit 90 Fawcett Street. Investigators interviewed the man shortly thereafter who confirmed that he has known about this escort service for approximately two years and was referred by a friend to it. He indicated that he began soliciting sex from the escort service utilizing his personal phone, but then obtained another phone (i.e., a “burner phone”) instead. He stated that he contacts the number [REDACTED]-5147 to arrange for commercial sex for a fee and that the phone number only accepts same day appointments. The man stated he was aware of a location in Watertown, three locations in 90 Fawcett (all of which he has been to, which include units 109, 435 and 530 (that is, Target Locations 4, 5 and 6) to have sex with a woman in exchange for money), and another location on Cambridgepark Drive that has since closed. The man stated he typically sends a text to the brothel number to determine who is available, receives a reply with a menu of available women, and replies with his selection. After doing so, the man indicated he is provided one of the above locations and a time for his appointment. He pays exclusively in cash, believes that there is a rotation of women, and has rarely seen the same girl twice. I am aware that, at the time of this interview, this man worked near the 90 Fawcett Street brothel locations.

B. Junmyung Lee leased Target Location 5.

39. JUNMYUNG obtained the lease for 90 Fawcett, Unit 435, that is, Target Location 5, for purposes of the prostitution business. JUNMYUNG is listed as the primary lessee and sole legal tenant of this apartment. The lease was contracted on approximately June 26, 2022 and ended on September 25, 2023. The rent is priced at \$3,664 per month. Starting in October 2023, JUNMYUNG began paying rent on a month-by-month basis, and incurred a \$200 late fee on October 1, 2023, which was paid in full using his personal bank account. In his rental application, JUNMYUNG listed his job title as “student.” JUNMYUNG listed an additional income as a

savings account containing \$157,969. As of the date of this Affidavit, that apartment is still being leased by JUNMYUNG.

40. On June 8, 2022, two days after JUNMYUNG submitted the rental application for Target Location 5, JUNMYUNG, the “student” who reported on the rental application that he had no discernible income, deposited \$35,700 cash into a personal Bank of America checking account at a branch located in Dedham, Massachusetts. Prior to that cash deposit, JUNMYUNG had \$1,000 in this bank account. On June 20, 2022, JUNMYUNG purchased a 2018 Chevrolet Corvette from an auto dealership in Quincy, Massachusetts for a base price of \$69,490. JUNMYUNG made a downpayment of \$25,500, as well as an additional debit card payment of \$315, utilizing the cash that he had just recently deposited into his checking account. JUNMYUNG financed the remaining balance with Lendbuzz and has since made regular monthly payments of approximately \$1,446 per month from his checking account. Based upon my familiarity with the investigation, I believe the \$35,700 in cash that JUNMYUNG deposited into his checking account was a payment for opening the brothel lease for Target Location 5 in his own name. I also believe that the payment was proceeds of the prostitution business.

C. **James Lee leased multiple current and former brothel locations in Massachusetts and Virginia, including Target Locations 4, 7, 8 and 9. As to the brothels in Target Locations 7 and 9, James Lee utilized fraudulent identification to procure those leases.**

41. JAMES has leased several brothel locations in Cambridge, Watertown, and Virginia which he and his co-conspirators use to facilitate the prostitution business. JAMES has leased at least a total of four brothel locations in Massachusetts and two in Virginia on behalf of www.bostontopten10.com and www.browneyesgirlsva.blog, respectively.

42. JAMES used his personal information to rent 77 New Street, Unit 210 in Cambridge, a location previously used by Boston Top Ten in the facilitation of the prostitution business. For that location, JAMES provided a copy of his identification to management for a year-

long lease that ended at the end of May 2022. On June 14, 2022, agents interviewed a sex customer who obtained sexual services in exchange for cash at 77 New Street, Unit 210. The customer indicated he went on “Preferred 411” and located a link a link to a booking agent and a website called “Bostontopten10.com.” The customer texted with the Boston Brothel Phone and was directed to 77 New Street, Unit 210 in Cambridge. The customer paid \$300 for a “GFE,” which I know stands for “Girlfriend Experience,” which, in this context, included full sexual intercourse with a condom with an Asian female and showers before and after sex.

43. On or about June 27, 2022, investigators observed HAN, moving trucks and movers around 77 New Street. The moving trucks drove to and from 90 Fawcett Street in Cambridge with items retrieved from 77 New Street. LEE accompanied the movers and the moving trucks from 77 New Street to 90 Fawcett Street. At around 11:28 a.m. that day, investigators observed HAN holding two cellular telephones. At around 1:47 p.m., investigators observed HAN and the movers enter the rear door of 90 Fawcett Street. Investigators spoke with the general manager for the 90 Fawcett Street apartment and learned that at around 1:47 p.m., a key opened Unit 109 of 90 Fawcett Street (Target Location 4) and that HAN paid July 2022 rent for Target Location 4. Based upon these observations and my knowledge of the investigation, I believe that the prostitution business facilitated through the www.bostontopten10.com website stopped using the 77 New Street location for purposes of furthering the prostitution business and instead moved the business to 90 Fawcett Street.

44. JAMES is the legal tenant and lessee for the 90 Fawcett, Unit 109 (Target Location 4) brothel location. The start date on this lease was around January 25, 2022 with an end date of April 23, 2023. The rent was listed as \$2,250 per month. The lease was renewed on April 24, 2023 through and including July 23, 2024, and the rent was listed as \$2,475 per month. Since the initiation of this lease in January 2022 in JAMES’s name, investigators have not seen JAMES at

Target Location 4. The sole lessee listed on the lease is JAMES. At the bottom of the lease, there is a signature with the name “Lee.” The phone number listed on the rental application was [REDACTED] [REDACTED]-3133, which I know to be the phone number tied to JAMES’s account agreement with Hanmi Bank in Los Angeles, California. Law enforcement conducted surveillance of JAMES in June of 2023 in California. Prior to that, investigators obtained a search warrant for precise location information for a phone utilized by JAMES. During the surveillance, the precise location data for the phone known to be used by JAMES moved with him, that is in and around Torrance, California, confirming that he in fact is the holder of the phone.

45. In support of his rental application, JAMES provided a copy of his California driver’s license, which reflected his place of residence at 1031 Park Circle in Torrance, California, that is, Target Location 3, and earnings statements in his name, with the company “A Plus C & F Inc,” reflecting a gross bimonthly salary of \$5,750 (calculated as \$138,000 annually). This company has a listed address in Anaheim, California. Investigators obtained and reviewed Bank of America account records for the business A Plus C & F Inc, which listed JAMES (title CEO) as the sole authorized signor on the account and found no payments (salary or otherwise) payable to JAMES.

46. In approximately March 2023, per the rent ledger, JAMES used a personal credit card to pay for rent at Target Location 4. Rent for Target Location 4 also has been paid for with multiple money orders.

47. JAMES is listed as the primary lessee and sole legal tenant at 2985 District, Unit 245 in Fairfax, Virginia (Target Location 8), which I know to be one of the brothel’s tied to www.browneyesgirlsva.blog. The year-long lease for this location was executed on June 1, 2021, began on July 8, 2021, and ended July 7, 2022. The price of the lease is \$2,850 per month plus an additional \$75 per month for a designated parking space. The lease contains a digital signature

from JAMES, dated May 26, 2021. On or about May 13, 2022, JAMES renewed the lease, again as the primary lessee and sole legal tenant. The lease start date was listed as July 8, 2022, and end date listed as July 7, 2023. The rent for Target Location 8 is \$3,236 per month plus an additional \$75 per month for a designated parking spot.

48. JAMES used two different fraudulent identities to procure the leases for two brothel locations, one in Watertown and one in Virginia.

49. JAMES leased the brothel located at 66 Bond, Unit 221 (Target Location 7) in the identity of L ■ K ■. As described below, JAMES's airline ticket, from California to Massachusetts and was in the name of his true identity, JAMES Lee. The flights were paid for by HAN. I believe he traveled to Massachusetts to secure the lease at Target Location 7 in his fraudulent identity. More specifically, Target Location 7's rental application was signed electronically on or about August 1, 2022, for a lease with a beginning date of August 22, 2022 and end date of October 21, 2023. The listed applicant's name was "Mr. L ■ h K ■;" with a listed address of "1031 park circle dr; Torrance, CA, 90502;" and listed email address of " ■ @gmail.com." The applicant listed his employer as "James Lee" and Supervisor's Name as "L ■ h K ■."

50. Representatives from the management office "Blvd & Bond" communicated with the future tenant for Unit 221 via email in the months leading up to the August 2022 lease. The email address for the tenant was "James Lee < ■ @gmail.com>." Emails sent from this email address were signed by the sender as: "K ■." On or about August 1, 2022, the management company sent an email to ■ @gmail.com in which it asked the following questions: "Will you be bringing any pets?"; "If you need parking, would you prefer an unreserved (\$100) or reserved (\$150) spot?"; and "How many occupants are going to live in the apartment with you?" On August 1, 2022, at approximately 10:20 p.m., James Lee < ■ @gmail.com> responded:

No pet
No parking spot
I live alone, my cousins will visit from time to time
Thank you
K

51. Based upon my knowledge of this investigation, including interviews with customers of the www.bostontopten10.com website after the customers exited Target Location 7 where they obtained sexual services for a fee, I do not believe that Target Location 7 is used as a single-tenant apartment, but instead used as a brothel, or location where prostitution occurs.

52. In support of the rental application and lease agreement, [REDACTED]@gmail.com sent the management company an email with a photocopy of what appears to be a California driver's license, with a photograph affixed to it. The license is in the name of "L H K;" the driver's license number is xxxx2607; the issuance date is October 17, 2017; and the expiration date is November 4, 2022. I have reviewed a copy of the information and photograph on file with the Department of Motor Vehicles ("DMV") in California for driver's license number xxxx2607 in the name of "L H K." I compared the photograph on file with the DMV for the "L H K" driver's license with the photograph affixed to the "L H K" driver's license submitted in support of the rental application for Target Location 7. The photographs appear to depict two different people.

53. In August 2022, the management company sent an email to [REDACTED]@gmail.com in which it stated, "There are a few items we will need to complete before your move-in date of August 22nd, 2022." One of the items listed was income verification, which could be provided in the form of last two pay stubs, offer letter, las years tax returns, or three months of bank statements showing consistent deposits. In response, "K" provided bank statements depicting three months of activity for Bank of America account *8506 ("BoA *8506"), however, as described below, these statements were fabricated and do not reflect the true name or account activity in the real BoA *8506 account. The format of the bank statements provided included a cover page for each

monthly statement that listed the full name and address of the account holder, in this case listed as L ■ H ■ K ■, 1031 Park Circle Dr, Torrance, CA 90502-2817 (that is, Target Location 3), as well as a repeat of the account holder's name on the cover page just below the statement period dates. In the subsequent pages of each monthly statement (the pages after the cover page), each page contained a header block on the top of the page that listed the account holder's name, the account number, and the date range of the statement. For one of the monthly statements provided, the name on the cover page that accompanied the mailing address was listed as L ■ H ■ K ■, however, the name in the area underneath the statement period dates reflected a name of "E ■ C ■ C ■" and the same "E ■ C ■ C ■" name was listed on the header block in each of the subsequent pages. Based on my training and experience, I believe that JAMES manipulated the Bank of America statement to reflect his fake alias L ■ H ■ K ■, but carelessly missed changing the false name on all pages of the bank statements, and instead left what is believed by investigators to be yet another alias utilized by JAMES, that of E ■ C ■ C ■. In addition, investigators obtained the actual bank statements for BoA *8506 directly from Bank of America and learned that BoA *8506 is an account held by an individual named D ■ K ■, with a listed address in Los Angeles, California, and that the account balances and transactions reflected on "K ■'s" version of the statement are not consistent with the actual account activity.

54. In addition to the falsified bank statements, "K ■" also provided paystubs in support of his income verification, which listed his employer as Comiso Central LLC, located at 1538 W Commonwealth Ave, Ste F, Fullerton, California, reflecting a gross bimonthly salary of \$7,150 (calculated as \$171,600 annually). Bank records associated with the Comiso Central LLC business, lists "K ■" as the sole authorized signor on the account. I believe that the business and its related account activity are truly under the control of JAMES.

55. In August 2022, the management company for Target Location 7 sent an email to

██████████@gmail.com in which it stated, “There are a few items we will need to complete before your move-in date of August 22nd, 2022.” Additionally, per records received from the management company, on or about August 22, 2022, at around 9:08 a.m., ██████████@gmail.com sent an email that stated: “I’m sorry. Is it possible to use the moving elevator from 12pm to 3pm? late arrival of moving car. Thank you K██████████.” Investigators learned from the management company at 66 Bond Street that an Asian female and older Asian male arrived at the property sometime in August of 2022 to obtain the key to the unit and for a tenant orientation. The Asian female requested, and was provided, two keys to the unit. A review of JetBlue records showed that JAMES Yun Lee traveled from Los Angeles to Boston on August 21, 2022, that is, the day before the purported “L██████████ H██████████ K██████████” planned to move in as a single occupant of Target Location 7. The ticket information listed JAMES’s known phone number as a phone number and “Han A. Lee, 80 Cambridge Park Drive, Cambridge, Massachusetts 02140” (Target Location 1) as an address associated with the reservation.

56. JAMES also used the identity of “J██████████ G██████████ W██████████” to procure the lease for the brothel located at 1500 Westbranch, Unit 649 in Tysons, Virginia (Target Location 9). This lease contract, dated September 23, 2023, establishes a rental period beginning September 30, 2023 through September 29, 2024. The rent was listed as \$3,575 per month. As described below, commercial airline flight records reflect roundtrip travel for JAMES from Los Angeles, California to Dulles International Airport beginning on October 2, 2023, which I believe to be consistent with JAMES meeting the property managers of Target Location 9 to obtain keys for the start of the lease of this second Virginia brothel location.

57. The rental application for Target Location 9 was submitted electronically on or about September 21, 2023. The listed applicant’s name was “J██████████ G██████████ W██████████,” the listed address was “515 ██████████ Alhambra, California,” and the listed email address on file (with whom

the property manager communicated) was [REDACTED]@gmail.com. The applicant listed an emergency contact name of Y [REDACTED] K [REDACTED], cousin, phone number [REDACTED]-9338, who I know to be associated with HAN.¹³ Submitted with the application is a photograph of what appears to be a California driver's license. The license is in the name of "J [REDACTED] G [REDACTED] W [REDACTED];" the driver's license number is xxxx5670; the issuance date is January 3, 2022; and the expiration date is June 7, 2027. Affixed to the purported driver's license submitted in support of the rental application for Target Location 9 is a photograph. That photograph appears to depict JAMES. I received from the California DMV a copy of the photograph on file associated with the driver's license for "J [REDACTED] G [REDACTED] W [REDACTED]." That photograph depicts a different person than the one depicted in the driver's license submitted by the lessee for Target Location 9.

58. Also included with the rental application is a pay stub payable to J [REDACTED] G [REDACTED] W [REDACTED] from a business called San Paolo LLC, 1309 W Valencia Dr, Ste L, Fullerton, California, reflecting a gross bimonthly salary of \$7,150 (calculated as \$171,600 annually). Based on a review of financial records gathered in connection with this investigation, I am aware that payments from a San Paolo LLC bank account were deposited into business bank accounts controlled by JAMES, business bank accounts controlled by JAMES's alias "L [REDACTED] H [REDACTED] K [REDACTED]", and a personal account held in the name of Y [REDACTED] K [REDACTED].

59. I have reviewed a copy of the photograph on file with the California DMV for JAMES and compared it to the photograph depicted in the "L [REDACTED] H [REDACTED] K [REDACTED]" driver's license

¹³ Y [REDACTED] K [REDACTED] was observed walking with HAN into 90 Fawcett Street, Cambridge, MA on June 6, 2023, after having flown into Boston's Logan Airport from South Korea. Y [REDACTED] K [REDACTED] remained in the United States until June 21, 2023, at which point he flew back to South Korea. During his stay in the Boston area, Y [REDACTED] K [REDACTED] opened a bank account in his name at Bank of America. After his departure from the United States, HAN was observed via bank surveillance conducting financial transactions in Y [REDACTED] K [REDACTED]'s bank account. Y [REDACTED] K [REDACTED] has not returned to the United States since.

submitted in support of the rental application for Target Location 7 and with the photograph depicted in the “J █ G █ W █” driver’s license submitted in support of the rental application for Target Location 9. I believe these three photographs to depict the same person. I also believe that JAMES committed wire fraud, in violation of 18 U.S.C. § 1343 and aggravated identity theft, in violation of 18 U.S.C. § 1028A when he used the identities of “L █ K █” and “J █ G █ W █” to procure apartment leases for brothels on behalf of the prostitution businesses. All three photographs, submitted in support of rental applications for brothels in Cambridge, Watertown, and Virginia by the person who I believe to be JAMES, are pictured below as Figures 6, 7, 8:

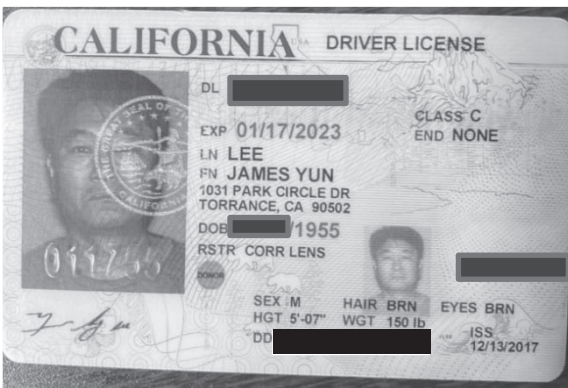


Figure 6: JAMES driver license



Figure 7: L.H.K. driver license



Figure 8: J.G.W. driver license

D. Han Lee used suspected prostitution proceeds to purchase hundreds of thousands of dollars of USPS and Western Union money orders to pay for rent and utilities at her own residence and the brothel locations.

60. Money orders have regularly been used to pay the monthly rent for HAN’s personal residence, as well as the monthly rental payments and utilities at the various brothel locations. In

many instances, there is evidence that these money orders were “structurally purchased,” meaning they were purchased for cash in increments less than \$3,000, in an apparent attempt to avoid Bank Secrecy Act (“BSA”) record keeping and reporting requirements. BSA regulations require Money Service Businesses (“MSBs”) to keep a record whenever MSBs provide money orders for cash in amounts of \$3,000 to \$10,000,¹⁴ inclusive, to the same customer in a day. The BSA record keeping requirements mandate that MSBs verify and record customer information (including their identification),¹⁵ record the transaction information (amount, date of sale, and serial number(s) for each instrument), and keep the record for five years from the date of transaction. Based on my training and experience, I know that breaking down large financial transactions that would trigger reporting requirements into smaller transactions below the reporting threshold is a common tactic that members of criminal organizations employ to conceal their identities, the criminal nature of their activities, and the nature and source of the funds they are transferring. I believe that members of this interstate prostitution network did so here.

61. As described herein, HAN personally resides at Target Location 1. Based on a review of HAN’s rental contracts (the initial lease plus extensions) for this property, HAN’s base monthly rent has ranged from \$2,627 per month since inception in June 2020 to \$2,942 per month beginning in October 2022, plus a \$45 monthly fee for each pet, of which HAN has had two or three at any given time. Investigators have obtained, on a sample basis, payment information for HAN from management at Target Location 1 and have also separately identified money orders

¹⁴ BSA regulations dictate that if a MSB receives cash of more than \$10,000 from the same customer in a day, the requirement extends beyond just keeping a record, and requires the MSB to file a Currency Transaction Report.

¹⁵ USPS requires the purchaser of money orders for \$3,000 or more to provide photo identification and to fill out a Funds Transaction Report (PS Form-8105A). I believe Western Union has similar requirements given that it also is an MSB.

applied towards HAN's rent payments through analysis of USPS money orders and money orders issued by Western Union. In total, between August 2020 and September 2023, investigators have identified sixty-three (63) money orders totaling \$39,940 that were submitted by or on behalf of HAN towards her monthly rent obligations. I believe the cash used to purchase the money orders to pay for her rent was generated from prostitution proceeds.

62. Similarly, based in part on payment information obtained directly from the management companies at each of the brothel locations, and part on further analysis of USPS and Western Union money orders, investigators have identified approximately three-hundred-fifty (350) money orders totaling approximately \$267,843 that were submitted towards the monthly rent obligations at the various brothel locations. Despite this significant volume, based on a review of the dates, agent locations, and sequentially numbered money orders, at no time were any of the money orders purchased together in a single transaction for an amount more than \$3,000. In fact, there were several instances in which the total amount of money orders purchased on a single day (when combining transactions at different agent locations) did exceed \$3,000, and sometimes even exceeded \$10,000, thus indicating an intent to structure the money order purchases to conceal or disguise the activity.

63. For example, on May 26, 2023, there were a total of nineteen (19) money orders purchased totaling \$12,200 that were submitted for rent payments at four different brothel locations. More specifically, two sequentially numbered USPS money orders totaling \$1,600 were purchased at a United States Post Office ("USPO") located in Harvard Square in Cambridge, Massachusetts and applied to the June rent for the brothel located at 90 Fawcett, Unit 109 (Target Location 4), on behalf of JAMES. Two sequentially numbered USPS money orders totaling \$1,900 were purchased at a USPO located in Central Square in Cambridge, Massachusetts, with one being applied toward the June rent for the brothel located at Target Location 4, on behalf of

JAMES and one applied toward the June rent for the brothel located at 90 Fawcett Street, Unit 530 (Target Location 6), on behalf of HAN. Three sequentially numbered USPS money orders totaling \$2,900 were purchased at a USPO located in Porter Square in Cambridge, Massachusetts, with one applied toward the June rent for the brothel located at 90 Fawcett, Unit 435 (Target Location 5), on behalf of JUNMYUNG, and two applied toward the June rent for the brothel located at 90 Fawcett, Unit 530 (Target Location 6), on behalf of HAN. At approximately 2:46 p.m., six (6) sequentially numbered Western Union money orders were purchased at a Star Market located in Cambridge, Massachusetts, all of which were applied toward the June rent for the brothel located at 66 Bond, Unit 221 (Target Location 7), on behalf of the JAMES identity in the name of L ■■■ K ■■■. At approximately 6:18 p.m., six sequentially numbered Western Union money orders were purchased at a Star Market located in Boston, Massachusetts, all of which were applied to the rent for the brothel located at 66 Bond, Unit 221, (Target Location 7) on behalf of the JAMES identity in the name of L ■■■ K ■■■. The total value of the sequential money orders that appeared to be purchased by the same person on a given day exceeded \$3,000. The purchaser could have purchased the money orders at one USPO or at one Western Union location in one transaction if he/she had tendered proper identification and filled out the proper form. I am aware of no reason, other than avoiding these requirements, that the purchaser would purchase money orders in separate transactions in succession.

64. Likewise, four sequentially numbered Western Union money orders (each for \$500) were applied to the rent in late-October for the newest brothel located at 1500 Westbranch, Unit 649, Target Location 9. Additionally, two singular \$1000 USPS money orders also were applied to the rent at Target Location 9. The memo lines for these six money orders listed “J ■■■ G ■■■ W ■■■” and the unit number of “649.” I believe that these money orders were purchased by HAN, or another member of the conspiracy, to conceal the prostitution proceeds and also to

promote the prostitution business (by paying for the brothel rent) at Target Location 9.¹⁶

65. Based upon my familiarity with this investigation, I believe that these money orders were purchased by or on behalf of HAN and the prostitution network because (1) the handwriting in the “memo lines” appears like and similar; (2) the money orders were submitted to rental apartments associated with HAN; and, (3) the video surveillance from some transactions appeared to depict HAN purchasing USPS money orders.¹⁷ I believe that cash proceeds of the www.bostontopten10.com and www.browneyesgirlsva.blog prostitution business were used to purchase money orders. I also believe that the structured purchases of less than \$3,000 per transaction allowed the prostitution business to conceal proceeds of unlawful activity. I further believe that converting the cash proceeds from the prostitution business into money orders allowed the business to conceal the illicit proceeds and make the payments for the rent and utilities at the brothels appear more legitimate, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

E. Han Lee, James Lee and Junmyung Lee concealed the proceeds of the prostitution business through U.S. bank accounts, peer-to-peer transfers, businesses and the purchase of money orders.

66. All three target subjects have engaged in substantial amounts of cash deposits and peer-to-peer transfers with one another and others who I believe are tied to the conspiracy. I believe this transfer of money is consistent with the targets sharing the proceeds of the prostitution business

¹⁶ At the time of the writing of this affidavit, I have not yet received records from USPS or Western Union related to the money orders applied to rent at Target Location 9 in the last week of October. Given my familiarity with the case, however, I believe that HAN, or someone close to her and familiar with the conspiracy, purchased these money orders.

¹⁷ The video footage from at least one transaction, which is preserved, depicts a woman (wearing a mask in light of the COVID-19 pandemic) paying in cash for the USPS money orders. Therefore, I am unable to view the entirety of the woman’s face. Based upon my knowledge of the investigation, including viewing HAN’s photograph, other video footage of HAN, and HAN in person multiple times during surveillance, I believe this particular video footage depicted HAN making USPS money order purchases with cash.

and also disguising the true nature and source of the funds.

67. As described above, I believe HAN regularly purchases USPS and Western Union money orders using the cash from prostitution proceeds to pay for rent and utilities at brothel locations. This pattern of using structured money orders to pay for rent at the brothels has continued as recently as October 2023. These money orders were used to pay rent for 90 Fawcett Street, Units 109, 435 and 530 (Target Locations 4, 5 and 6), 66 Bond Street, Unit 221 (Target Location 7), 2985 District Avenue, Unit 245 (Target Location 8), 1500 Westbranch Drive, Unit 649 (Target Location 9) as well as 80 Cambridgepark Drive, Unit 638 (Target Location 1, HAN's residence). Most of the money orders contain a "from" memo line, in which the corresponding lessee is listed as the sender. The United States Postal Inspection Service conducted an analysis of the USPS money orders purchased during this time period which showed that the USPS money orders were purchased from multiple post offices, including, but not limited to, Annandale, Virginia, multiple locations in Cambridge, Watertown, Belmont, Arlington, Brookline, and Somerville, Massachusetts. I believe that cash proceeds of the www.bostontopten10.com and www.browneyesgirlsva.blog prostitution businesses were used to these purchase money orders. I also believe that the structured purchases of less than \$3000 per transaction allowed the prostitution business to conceal proceeds of unlawful activity. I further believe that converting the cash proceeds from the prostitution business into money orders allowed the business to conceal the illicit proceeds and make the payments for the rent and utilities at the brothels appear more legitimate.

68. Additionally, based on a review of bank records, I believe that HAN and JUNMYUNG have deposited significant amounts of cash derived from the prostitution business into their respective accounts. Between December 2019 and October 2023, HAN has deposited just under \$795,000 of cash into her personal Bank of America bank accounts, while also utilizing

another approximately \$109,000 in cash to make payments against her Bank of America credit card account, which she utilizes regularly for travel related purchases and other expenses associated with brothel operations. Similarly, during that same time period, JUNMYUNG has deposited just under \$194,000 cash into his personal Bank of America account, while also utilizing another \$47,305 in cash to make payments against his Bank of America credit card account. Despite significant surveillance during this investigation, neither JUNMYUNG nor HAN have appeared to engage in any legitimate work. I also do not believe that there is any reason for JUNMYUNG (who is a student) or HAN to have access to such a large amount of cash during a short period of time unless that cash was through an illegal enterprise like this prostitution network.

69. Both HAN and JUNMYUNG also engage in significant peer-to-peer (“P2P”) transfers with each other, with other co-conspirators known to be associated with the prostitution business, and other third parties for reasons yet to be determined. Between December 2019 and October 2023, HAN received P2P transfers from a few select number of people, including JUNMYUNG (\$21,905). Conversely, during that same time period, HAN sent more than \$415,000 in P2P transfers to various individuals, including just under \$55,000 in P2P transfers to JAMES, or in some instances to his wife. Based on the monthly frequency and dollar amount associated with these transfers to JAMES, I believe that these transfers represent compensation to JAMES’ for renting brothel apartment locations in his name.

70. Similarly, JUNMYUNG has received a significant number of P2P transfers into his account, approximately \$98,000 since January 2022. Among the transfers received by JUNMYUNG were approximately \$22,600 from, or on behalf of, HAN.

71. In addition to the compensation JAMES has received from HAN described above, which was deposited into his personal accounts, JAMES also maintains several business accounts in a variety of business names, as well as one personal and three business accounts that JAMES

controls under JAMES's fraudulent identity of L■■ K■■. In each of these financial accounts, there are extensive transfers of funds, primarily via check payments, that move funds in a circular, non-sensical manner, similar to a check kiting scheme. I believe that the volume of activity in the accounts is intentional, simply to conceal and disguise the origin, source, ownership, and control of money moving through the multiple accounts. Investigators have identified a number of deposits from various covid related relief funds flowing into the accounts, as well as some cash, money order, and P2P payments, on a much smaller scale than the check funding movement.

72. Overall, the financial activity in JAMES' various business accounts do not appear commensurate for the listed purposes of JAMES's businesses. The funds were immediately depleted shortly after they were deposited into the account. The rapid movement of funds did not appear typical for business accounts, particularly where the business lacks expected activity like payroll, tax payments or rent/utility payments. I therefore believe that JAMES utilized these accounts to quickly move illicit proceeds of the prostitution business.

F. **Han Lee paid for James Lee's travel to open brothel locations in Massachusetts and Virginia. James Lee traveled to Boston and Virginia at the start of the brothel leases that he signed. James Lee receives a payment on approximately a monthly basis for the apartment leases that he placed in his name, or in his fraudulent identities, for the brothel locations.**

73. During the investigation, law enforcement received information from a confidential source ("CS") related to the operation of brothels located in Massachusetts and Virginia and a California-based man (believed to be JAMES) who signs apartment leases on behalf of brothel owners for a fee.¹⁸ In Spring 2023, investigators learned from the CS that a female, ~~that the CS~~ Which the CS referred to as its "sister,"

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¹⁸ The CS has been cooperating with law enforcement since approximately 2020. The CS began cooperating with law enforcement for leniency at sentencing on then-pending federal charges. The CS was convicted of and incarcerated for the federal charges and did receive leniency at sentencing as a result of the CS's cooperation. More recently, the CS has provided information in exchange for immigration benefits. The CS's cooperation with law enforcement has led to

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knew planned to open a “shop” in New Jersey. Investigators understood “shop” to mean brothel or commercial sex business and “sister” to not mean a relative but instead a business associate involved in the commercial sex industry. The CS stated the CS’s “sister” consulted with another brothel owner in Boston regarding how to obtain a lease for an apartment and use it as and for a brothel. The CS stated, in sum and substance, her “sister” was in contact with a woman named “Hana,” who provided the CS’s “sister” with a name of a man who resides in California and uses his identity to assist brothel owners with leasing apartments. The CS stated “Hana” was aware that this California-based man has two separate identities that he uses to procure apartment leases and that he currently has apartment leases for brothels in both Massachusetts and Virginia and that he used both of his two identities. Based upon my familiarity with this investigation, at the time of this conversation with the CS in spring of 2023, I believed that one identity of the California-based man to be a true identity and the other to be a false one.¹⁹ Based on my familiarity with this investigation, I know that “Hana” is a reference to HAN. The CS obtained a phone number associated with the California-based man and that phone number was [REDACTED]-3133, that is, the number I know to be associated with JAMES.

74. In August 2023, under the direct supervision of investigators, the CS placed a recorded call to JAMES. The call, which was in Korean, was for the CS to discuss establishing a brothel in the Connecticut area and for JAMES to use his identity to sign the lease associated with that brothel. After the call, the CS (through a Korean interpreter) summarized some details of the

arrests of individuals and seizures of proceeds of illegal activities. Information provided by the CS during this investigation is believed to be reliable and is corroborated as set forth herein.

¹⁹ As described herein, the California-based man is believed to be JAMES. Since the time of the conversation with the CS in spring 2023, investigators have learned that JAMES has not just one false identity that he uses to procure leasing documents on behalf of prostitution networks, but at least two.

communication with JAMES. Of note, JAMES stated that he will receive \$1000 per month (on top of the rent and utilities which must be paid by the brothel manager) to rent a brothel using his identity. JAMES also stated that, because he resides in the Los Angeles area, the CS would need to cover travel costs, plane tickets and hotel costs for one night. JAMES further indicated, in sum and substance, if he receives a call during an inspection, he will say “she’s my niece, she’s a student, you can just knock and go in” and the CS would relay to that female to open the door. JAMES also referenced “Hana in Boston” when referring to work he currently has in other areas.

75. Just as JAMES explained to the CS that he would need to have his travel paid for should there be a need for him to travel from Los Angeles and sign any rental documents in person, a review of HAN’s financial records indicate that HAN has done just that on several occasions. In May 2021, HAN incurred a credit card charge on her Bank of America credit card ending in *5994 for \$553.80 with Delta Airlines referencing roundtrip travel by JAMES from Los Angeles to Boston beginning on May 25, 2021. A review of Delta Airlines flight records revealed that JAMES departed Los Angeles on May 25, 2021 at 2:10 p.m. and left Boston on his return trip the following day on May 26, 2021 at 5:29 p.m. As noted above, the initial lease date for the brothel location at 77 New St, Unit 210, Cambridge rented by JAMES was May 26, 2021.

76. On May 31, 2021, HAN incurred a credit card charge on her Bank of America credit card ending in *5994 for \$463.80 with United Airlines referencing roundtrip travel by JAMES from Los Angeles to Dulles International Airport in Virginia scheduled to begin on July 7, 2021.²⁰ The timing of this flight, booked by HAN for JAMES’s travel, coincided with the initial lease date of July 8, 2021 for the brothel located at 2985 District, Unit 245 (Target Location 8).

²⁰ United Airlines records reviewed do not reflect completed travel consistent with this itinerary.

77. On June 16, 2022, HAN incurred credit card charges on her Bank of America credit card ending in *5994 with JetBlue and Delta Airlines for travel by JAMES in August. Flight records obtained from JetBlue revealed that JAMES flew on August 21, 2022 departing Los Angeles at 11:22 p.m. to Boston. The following day on August 22, 2022, JAMES returned to Los Angeles via Delta Airlines departing Boston at 6:10 p.m. The flights were booked under the name of JAMES Lee. This travel coincides with the brothel rental at 66 Bond, Unit 221 in Watertown (Target Location 7), by JAMES, in the identity of “L ■■■ K ■■■” effective August 22, 2022.

78. In October 2023, HAN incurred a credit card charge on her Bank of America credit card ending in *5994 with United Airlines for travel by JAMES beginning on October 2, 2023 for roundtrip travel from Los Angeles to Dulles International Airport in Virginia. The passenger’s name listed was JAMES Lee. Timing of this scheduled trip is near in time to the beginning of the brothel rental effective September 30, 2023 at 1500 Westbranch, Unit 649 in Tysons, Virginia (Target Location 9) by JAMES in the “J ■■■ G ■■■ W ■■■” identity.

79. Consistent with information JAMES shared with the CS, I believe that JAMES receives monthly payments from HAN for the brothel leases in his name. Among HAN’s Zelle transfers were \$54,853 in payments to JAMES and/or his wife V ■■■ L ■■■ that occurred between March 2022 and September 2023. Although the Zelle payments only started in March 2022, based on a review of JAMES’ bank accounts, it appears that HAN previously paid JAMES with money orders, as JAMES deposited approximately \$15,800 in money orders between June 2021 and January 2022 that were consistently deposited on a monthly basis. One of the money orders deposited by JAMES specifically referenced the address of “77 New St,” which is the first brothel location known to have been rented by JAMES on HAN’s behalf. Based on the fee structure explained by the CS, that JAMES charges \$1,000 per month, per leased apartment, HAN would owe JAMES approximately 64 months-worth of payments, or \$64,000, I believe is generally

consistent with the amount of Zelle transfers received by JAMES from HAN, plus the money orders deposited into JAMES' accounts.

80. Also consistent with information shared by JAMES with the CS, I believe that JAMES in fact provides cover to the prostitution business in instances where property managers check in on and conduct inspections of the brothel locations. For example, on August 31, 2023, at around 10:15 a.m., the property manager for 2985 District Ave, Unit 245 (Target Location 8) contacted JAMES as the listed lessee phone number of [REDACTED]-3133 related to a possible water leak in his unit and the need for the property manager to conduct an inspection. About twenty minutes later, the property manager knocked on the door of Unit 245 and an unidentified Asian female, who stated her name was "Jisoo," opened the door. The Asian female led the property manager to an area in the utility closet, where in fact a leak occurred. After conducting an inspection and taking a video of the leak, the property manager left the unit and placed another call to JAMES. During that call, the property manager asked JAMES about who was residing in the unit to which JAMES stated it was his daughter. When the property manager asked JAMES his daughter's name, JAMES was unable to provide an answer. Investigators viewed www.browneyesgirlsva.blog which advertised that "Jisoo" would be available on September 2. Therefore, I believe that the Asian female was the woman advertised as "Jisoo" on the Virginia Brothel website. I further believe that JAMES knew the female in the apartment was staying at that location for purposes of prostitution.

G. Han Lee and Junmyung Lee frequently visit and maintain the Cambridge and Watertown brothels.

81. HAN and JUNMYUNG both frequent the Cambridge and Watertown brothel locations to maintain the prostitution business.

82. For example, on December 6, 2022, HAN was observed leaving her residence (Target Location 1) and walking her three dogs to 90 Fawcett Street, Unit 109 (Target Location

4). On January 3, 2023, at approximately 10:54 a.m., video surveillance at 90 Fawcett in a publicly accessible hallway showed HAN approach Unit 435 (Target Location 5) carrying a suitcase. An unknown Asian female was walking behind her. HAN opened the door to Target Location 5 utilizing a key and led the Asian female inside. At approximately 12:39 p.m., HAN exited Target Location 5, shut the door behind her, and used a key to lock the door from the outside. I believe the unknown Asian female remained inside the unit. HAN subsequently departed. On January 4, 2023, at approximately 5:25 p.m., agents conducting surveillance at 90 Fawcett Street observed an Asian female leave 90 Fawcett Street. Approximately ten minutes later at 5:35 p.m., agents observed this same Asian female enter a nearby animal hospital and meet up with HAN and HAN's three dogs. At around 5:51 p.m., a Cambridge Police officer approached HAN and the female to confirm their identifications. HAN provided her Korean passport bearing her name and photograph. The unknown female was identified as well.²¹ At around 6:30 p.m., agents observed a different Asian female exit Unit #435 of 90 Fawcett Street (Target Location 5) and discard a bag of trash. Investigators located the same trash bag at the bottom of the trash chute on the first floor. Agents conducted a trash pull of the discarded bag which revealed, among other things, an H-Mart grocery store receipt in an amount over \$200 and a JetBlue Airlines boarding pass for Flight 688 from LAX to BOS dated January 2, 2023 for an Asian female passenger, and a baggage receipt sticker for the same individual. I believe this Asian female traveled from Los Angeles to Boston to engage in prostitution on behalf of Boston Top Ten's prostitution business. I further believe that she was enticed to travel from Los Angeles to Boston because all other aspects of the commercial sex service were provided to her. These aspects include, but are not limited to, room and board, the discrete location of a high-end apartment complex where she is to engage in commercial sex

²¹ The unidentified Asian female's name is known to law enforcement but is not being disclosed at this time.

for a fee, food and grocery delivery, advertisements posted to a clientele base that communicates directly with the facilitator without the commercial sex worker having to communicate with customers, and cash payments for the sex at a higher rate.

83. On January 22, 2023, at around 8:00 p.m., agents at 90 Fawcett Street observed a white two-door Maserati (“Maserati”) pull up to 90 Fawcett. An Asian male, determined to be JUNMYUNG, exited the vehicle and escorted an Asian female inside 90 Fawcett Street. Precise location information for the Boston Brothel Phone placed it in the vicinity of Fawcett Street. I believe that JUNMYUNG transported a commercial sex worker to 90 Fawcett on behalf of the prostitution business. At around 8:25 p.m., JUNMYUNG exited 90 Fawcett, entered the Maserati, and drove away. A marked Cambridge Police Department unit stopped the Maserati. The driver of the Maserati identified himself as JUNMYUNG and informed the officer that the Maserati was a short-term rental borrowed through the cell phone application, “Turo.” Shortly after the stop, at around 8:40 p.m., agents observed JUNMYUNG arrive at 66 Bond Street in Watertown where he parked, exited the Maserati, and entered the building using a key fob. At around 8:47 p.m., precise location information for the Boston Brothel Phone placed it in the area of 66 Bond Street, consistent with JUNMYUNG being the holder of the device at this time. At approximately 8:48 p.m., JUNMYUNG left 66 Bond Street and entered the Maserati.

84. On February 15, 2023, agents observed JUNMYUNG at Target Location 1 (HAN’s residence). He picked up both HAN and an unidentified Asian female and drove them to 66 Bond Street in Watertown, the location of Target Location 7. JUNMYUNG and HAN both entered 66 Bond and assisted the Asian female with bringing groceries and luggage inside of Target Location 7. JUNMYUNG subsequently returned to Target Location 2, his residence, where he is believed to have remained overnight.

85. On April 11, 2023, at around 2:58 p.m., agents observed two unknown Asian

females exit 66 Bond Street with HAN. The females had luggage with them, which was loaded into a Toyota Highlander, believed to be a ride share. One of the Asian females entered the ride share which traveled directly to Logan Airport, Terminal B, at which time the female exited the ride share, removed her luggage, and proceeded into the terminal. The female was subsequently identified, with the assistance of a Massachusetts State Police Trooper to whom she produced a Washington state driver's license. I reviewed www.bostontopten10.com website that day and observed pictures of a female nicknamed "LV Tiffani." I compared those pictures to the one I observed on the Washington state driver's license and believe that "LV Tiffani" is that woman. I further believe she was in Massachusetts for purposes of engaging in prostitution on behalf of the Boston Top Ten organization. Simultaneously, other agents remained in the area of 66 Bond Street and observed HAN with the other unknown Asian female. Together they went to the grocery store, got ice cream, and returned back to Target Location 7. HAN used a key fob to enter the rear of the building. Video surveillance reviewed later that day showed HAN assisting the Asian female who went to the airport with removing her luggage from the unit. It also showed HAN assisting the Asian female with whom HAN bought ice cream and groceries later that evening with bringing her luggage into the unit. I believe that these women were commercial sex workers and that HAN cycled out the female that went to the airport with the female that had just arrived at the brothel location. Having a frequent rotation of females keeps demand, and therefore profits, high because new commercial sex workers provide a new experience for the sex buyer.

86. On June 7, 2023, HAN and Y [REDACTED] K [REDACTED] (mentioned above) entered a vehicle outside of 90 Fawcett Street. They drove together to a Bank of America (after hours) located at 35 Fresh Pond Parkway in Cambridge, Massachusetts. Shortly thereafter, HAN and Y [REDACTED] K [REDACTED] drove to HAN's residence (Target Location 1). Records received from Bank of America showed that HAN deposited \$1,160 in cash at the ATM on Fresh Pond Parkway in Cambridge. I believe

that HAN retrieved prostitution proceeds from the brothels located at 90 Fawcett and immediately deposited that cash into bank accounts.

87. Additionally, on June 12, 2023, investigators observed a white Toyota Camry, rented by Y [REDACTED] K [REDACTED] arrive at 90 Fawcett Street. HAN exited the passenger side and entered 90 Fawcett. HAN and Y [REDACTED] K [REDACTED] both travel to a Bank of America located at 1414 Massachusetts Avenue in Harvard Square in Cambridge. Records received from Bank of America showed that \$2,000 in cash was deposited into Y [REDACTED] K [REDACTED]'s account and \$1,670 was withdrawn from HAN's account (in two separate transactions) at the Harvard Square branch of Bank of America. Subsequently, they drove to a USPO located at 125 Mt. Auburn Street in Cambridge. HAN was observed at the front counter at this location where I believe, based on my familiarity with the investigation, she exchanged cash proceeds from the prostitution business into USPS money orders. Both parties then drove together to an H-Mart in Cambridge and subsequently drove back to 90 Fawcett Street. HAN entered unit 435 (Target Location 5) and left 90 Fawcett and reentered Y [REDACTED] K [REDACTED]'s vehicle. I believe that HAN purchased groceries for the commercial sex workers located at 90 Fawcett.

88. I believe that JUNMYUNG travels to both the Cambridge and Watertown brothel locations in order to maintain the units, collect prostitution proceeds, bring women from unit to unit, and assist the women with errands during their "rotation" at the Boston Top Ten brothels.

H. Han Lee maintains and frequently visits the Virginia brothels.

89. On January 19, 2023, agents conducted surveillance at Target Location 8. At approximately 2:00 p.m., investigators heard a door close in the vicinity of unit 245. An investigator walked towards unit 245 and observed an Asian female, with two dogs beside her, locking the door of unit 245. Investigators recognized this Asian female as HAN, who investigators

knew then-resided in Cambridge, Massachusetts.²²

90. Additionally, bank records for HAN showed transactions showing round trip airline travel in HAN's name from Boston to the Washington, DC area from September 30, 2023 through October 2, 2023. The timing of these flights aligned with both the travel of JAMES to the Virginia area and the start of the lease for the brothel located at Target Location 9. Additional financial transactions during from this timeframe showed that HAN used her credit card around October 2, 2023 in Virginia at locations like Walmart, Home Goods, Mattress Firm, Home Depot and TJ Maxx in amounts of several hundred dollars at each location. I believe that HAN traveled to Virginia to set up and furnish her newest brothel location, located at Target Location 9.

I. Junmyung Lee and Han Lee have access to the phones associated with the Boston and Virginia brothel locations and communicate with brothel clients using the listed phone numbers.

91. JUNMYUNG and HAN appear to maintain possession of two of the three brothel phones associated with the brothel websites; these are phone numbers that brothel clients use to book appointments with sex workers. HSI received federal search warrants to obtain precise location information related to the following phones: [REDACTED] [REDACTED]-5147 for www.bostontopten10.com; and [REDACTED] [REDACTED]-8262 and [REDACTED] [REDACTED]-2277 for www.browneyesgirlsva.blog (Virginia Brothel Phone 1 and 2). *See* 23-4103-DHH; 23-4328 and 4330-DHH; 23-4589, 23-4591 and 23-4599-DHH (under seal). Investigators also obtained precise location information for phones used by HAN, JAMES and JUNMYUNG. *See* 23-4332, 23-4334 and 23-4336-DHH; 23-4593, 4595 and 4597-DHH (all under seal). The location data generally place the Boston Brothel Phone and Virginia Brothel Phone 1 in the areas of Dedham,

²² From surveillance of HAN and from HAN self-reporting a "bulldog" for a pet on the rental documents for her apartment located at 80 Cambridgepark Drive in Cambridge, Massachusetts, investigators are aware that HAN owns at least one small dog.

Massachusetts or Cambridge, Massachusetts.²³ During the overnight hours (midnight to 7:00 a.m.), location data usually places the Boston Brothel Phone in the vicinity of JUNMYUNG's residence and Virginia Brothel Phone 1 in the vicinity of HAN's residence. Therefore, I believe that HAN and JUNMYUNG are the holders of the brothel phones and communicate with brothel clients on behalf of the prostitution network. In other words, if a sex buyer wished to purchase sex with a female advertised on either website, they would text a number that would ping a phone that was in the possession of either HAN or JUNMYUNG at any given time, showing that they had control over the prostitution operation at all times.

92. From approximately January 16, 2023 through February 12, 2023, precise location information for the Boston Brothel Phone placed it generally in locations tied to JUNMYUNG, including in Dedham, Massachusetts for the majority of the overnight hours. For example, on January 17, 2023, at 9:35 a.m., video surveillance showed JUNMYUNG enter 90 Fawcett, Unit 109 (Target Location 4). He stayed for less than a minute and left. At 9:38 p.m., video surveillance showed JUNMYUNG enter 90 Fawcett, Unit 435 (Target Location 5). He exited three minutes later with two females who were wheeling suitcases. From there, JUNMYUNG was believed to have driven to the Watertown brothel location (Target Location 7). Precise location information for the Boston Brothel Phone showed it travel from the Cambridge area, consistent with JUNMYUNG's location at 90 Fawcett Street, to Watertown (and within the vicinity of Target Location 7) where it remained for approximately fifteen minutes. Location data for the Boston Brothel Phone then showed it travel to Dedham, near Target Location 2, where it remained for the

²³ Precise location information for Virginia Brothel Phone 2 received beginning on or about October 27, 2023 through the date of this Affidavit placed it generally in a location other than Massachusetts. The location and holder of that device remains under investigation. While indeed Virginia Brothel Phone 2 is listed on Brown Eye Girl website, agents who interviewed customers who received prostitution services from the Virginia brothel locations learned that those customers communicated with Virginia Brothel Phone 1.

duration of the overnight hours.

93. Based on the above, I believe that JUNMYUNG was the holder of the Boston Brothel Phone on this day, and he carried it with him as he transported females from the Cambridge to the Watertown brothel locations. Additionally, bank records for JUNMYUNG's Bank of America bank account reflected two (what I believe to be, structured) cash deposits made the following day, that is, January 18, 2023. One was in the amount of \$3,600 and the other in the amount of \$7,770, thus exceeding the reporting threshold of \$10,000, but one deposit was conducted via a counter deposit while the other via an ATM deposit, both at the same bank location in Dedham, Massachusetts. Based upon my training and experience and familiarity with this investigation, I believe that the cash that JUNMYUNG deposited into his bank account the day after he briefly visited the brothels at Target Locations 4 and 5 were prostitution proceeds that he picked up from the units on January 17, 2023.

94. Additionally, on January 19, 2023, that is, when agents observed HAN in Virginia at Target Location 8, precise location information for the Boston Brothel Phone placed that device in Massachusetts, including in locations in the vicinity of JUNMYUNG's residence in Dedham, Massachusetts. At that same time, precise location information for JUNMYUNG's phone placed it in Dedham as well. I believe during the time that HAN was in Virginia that JUNMYUNG was one, if not the only, holder of the Boston Brothel Phone and therefore, JUNMYUNG communicated with customers of the www.bostontopten10.com prostitution business. During dates in February 2023, specifically, from on or about February 12, 2023 through February 15, 2023, however, location information for the Boston Brothel Phone placed it frequently in the vicinity of HAN's residence.²⁴

²⁴ I am aware, however, that the radius for the location data is large and includes both HAN's residence and the Cambridge brothel locations. Because of that, when the brothel phones

95. On January 27, 2023, agents conducted interviews of sex customers at the 90 Fawcett Street location. During these interviews, which were conducted at around 6:07 p.m. and 7:56 p.m., the customers indicated that they communicated with the phone number [REDACTED]-5147 to arrange for appointments for commercial sex in exchange for money at 90 Fawcett. The customer interviewed at 6:07 p.m. indicated, among other things, that he texted with the Boston Brothel Phone to set up the commercial sex for a fee. He previously has been directed to Target Locations 4 and 7. For this sexual encounter, this customer booked with the Boston Brothel Phone a two-hour appointment for \$640, which he paid in cash. The sexual encounter consisted of a shower, two hours of oral and vaginal sex, and another shower at the conclusion of service. At 7:56 p.m., agents spoke with another customer who indicated that he has used the “Bostontopten10.com” service once per week over the last two years; that he communicates with [REDACTED]-5147 to schedule appointments, that he has patroned 66 Bond Street Unit 221 and 90 Fawcett Units 435 and 109, and that condoms are always provided by the female. For this sexual encounter, he paid \$240 in cash for vaginal sex and a shower before and after the sex. During the entirety of the surveillance conducted by agents in the area of 90 Fawcett Street, precise location information for [REDACTED]-5147 placed it in the vicinity of Legacy Place in Dedham, Massachusetts. Therefore, I believe that JUNMYUNG communicated over the Boston Brothel Phone on behalf of the prostitution business to arrange appointments for with these customers to obtain sex for money.

96. On June 13, 2023, precise location information placed Virginia Brothel Phone 1, Boston Brothel Phone and JUNMYUNG’s personal phone in the area of Dedham, Massachusetts. JUNMYUNG left his residence and shortly after doing so, precise location information for all

are located in Cambridge, Massachusetts it is possible that the holder is JUNMYUNG (or another) who has traveled to the brothel locations.

three of these phones showed that they moved together and in a manner consistent with JUNMYUNG's travels. Therefore, I believe that on this date, JUNMYUNG was the holder of both the Boston Brothel Phone and Virginia Brothel Phone 1. I further believe that because he was the holder of the two brothel phones that he was communicating and arranging for appointments with sex customers on behalf of the prostitution business.

97. More recently from approximately October 26, 2023 through and including November 2, 2023, precise location information for the Virginia Brothel Phone 1 indicated that the phone was possessed by HAN during this time. Specifically, precise location information for HAN's personal phone and the Virginia Brothel Phone 1 showed that during the overnight hours of midnight to 7 a.m., both devices were in the vicinity of HAN's residence, Target Location 1. Of particular note, during the stops of customers outside of Target Locations 8 and 9 in Virginia (discussed above) on October 26, 2023 and October 27, 2023, precise location information placed both Virginia Brothel Phone 1 and HAN's phone together. Therefore, I believe HAN communicated with the customers that we spoke with who obtained sex for a fee at the Virginia brothels on these dates. As such, I believe that for this period of time, HAN was communicating and arranging for appointments with sex customers on behalf of the prostitution business, specifically, the brothels located in Virginia.

98. On November 2, 2023, at around 11:15 a.m., precise location information for HAN's personal phone and the Virginia Brothel Phone 1 placed it around the Watertown Brothel, that is, Target Location 7. At around 11:52 a.m., investigators observed HAN and an unknown Asian female exit the back door of 66 Bond Street and walk to the nearby supermarket and sit down in the café. At around 12:16 p.m., an agent saw HAN and the unidentified Asian female still sitting in the café and HAN in possession of two phones, which I believe to be Virginia Brothel Phone 1 and her personal cell phone.

99. Also from approximately October 26, 2023 through and including November 2, 2023, precise location information for the Boston Brothel Phone indicated that the phone was possessed by JUNMYUNG during this time. Specifically, precise location information for JUNMYUNG's personal phone and the Boston Brothel Phone showed that during the overnight hours of midnight to 7 a.m., both devices were in the vicinity of JUNMYUNG's Dedham residence, Target Location 2. The Boston Brothel Phone was within an approximately 200-meter radius of Target Location 2. Therefore, I believe that for this period of time, JUNMYUNG was communicating and arranging for appointments with sex customers on behalf of the prostitution business, specifically, the brothels located in Cambridge and Watertown.

J. Subscriber information for the Boston and Virginia brothel websites are tied to HAN and Target Location 8, respectively.

100. Based on information received from Newfold Digital, Inc., agents received customer information from the registration of www.Bostontopten10.com. The customer information revealed that the registrant, admin, technical details, and billing details all came back to HAN. The listed address was 120 Cambridgepark Drive, Cambridge, MA, which is a known previous address of HAN. The listed phone number associated with the account is [REDACTED]-7065, which is also a phone number tied to HAN.

101. Based on information received from Automatic Trust and Safety, agents received customer information from the registration of www.browneyesgirlsva.blog. The customer information revealed that the account holder listed their address as 2985 District Avenue, Fairfax, Virginia, the same address as Target Location #8.

II. SUMMARY OF EVIDENCE STATED ABOVE RELATED TO AND FOR TRANSPORTATION AND COERCION

102. Agents have witnessed, on several occasions, the arrival and departure of females for the specific purpose of commercial sex. For example, On August 31, 2023, agents visited

www.browneyesgirlsva.blog and observed a female with the moniker “Ginger.” The website stated “9/1 Open.” Agents were conducting surveillance outside 2985 District Avenue, Fairfax, VA, that is, Target Location #8, when they noticed a livery vehicle pull up to the front entrance of Target Location #8. A Hispanic female, matching the description of “Ginger”, exited the vehicle with multiple suitcases, and walked into the front entrance of Target Location #8. Agents followed the female to the second floor, where she subsequently entered Unit 245, that is, Target Location #8. The next day, September 1, 2023, agents stopped and interviewed a customer who visited Target Location #8. The customer stated he received commercial sex services, specifically oral sex, from a female who he described as “Ginger.”

103. Additionally, HAN used her personal credit card to pay for travel for Asian females who I believe are of the age of the commercial sex workers at the Virginia and Boston brothel locations. For example, HAN used her personal credit card to pay for a flight by for a female (Female A) to travel on May 24, 2022 from Boston to Virginia. I believe this was for the woman to engage in prostitution at the Boston brothel and then continue on to the Virginia brothel. Female A also flew on June 5, 2022 from Las Vegas to Virginia, and such travel was paid for using HAN’s credit card. HAN used her personal credit card for an Asian female’s flight on September 26, 2022 from Los Angeles to Boston. As detailed above, on January 4, 2023, agents saw an unidentified Asian female exit Target Location 5 with a trash bag to the trash room. Agents recovered the trash bag from the trash chute and found a JetBlue boarding pass for an Asian female dated January 2, 2023, for a flight from Los Angeles to Boston. I believe this Asian female traveled to Boston from Los Angeles to engage in prostitution.

104. The co-conspirators, mainly HAN and JUNMYUNG, used coercive tactics to maintain the fluidity and effectiveness of the rotation of women as described above to further their prostitution network. Some of the tactics include, but are not limited to, delivering food to females

so they do not have to exit the building and spend time away from the apartment, ensuring the unit is prepared before the arrival of a female, and assisting females with their luggage into the brothel units, and subsequently locking the door behind them after exiting. Specifically, on January 3, 2023, HAN was observed via a publicly accessible surveillance camera assisting a female into 90 Fawcett Street, Unit 435 (Target Location #5). After shutting the door, HAN locked the door behind her before departing. I believe HAN utilized this tactic so that the commercial sex providers felt that they had to stay in the unit to perform sex acts for cash on behalf of the prostitution network.

105. Similarly, on October 23, 2023, agents stopped a commercial sex customer who was visiting 66 Bond St, Watertown, MA, that is, Target Location 7. At this time, I believe JUNMYUNG to be the holder of the Boston Brothel Phone, which the customer was communicating with to set up date. Agents reviewed the messages between the customer and the Boston Brothel Phone and observed the following text message: “Only GFE Services, No BB Services!! Do Not Share with her that we are offerings [sic] Extra Services!!” I believe this message to mean that the services offered are predetermined, and not subject to negotiation by the commercial sex worker. This message is expressly provided to customers, presumably without the knowledge of the female, in order to keep her out of the negotiations for the price of sex.

106. Additionally, JAMES provided an aspect of protection for the facilitators, including HAN and JUNMYUNG, of the commercial sex operation. JAMES rented several brothel locations, some in his own name and some in fraudulent identities, to aid in avoiding detection from law enforcement, and more importantly, so that the properties are not directly connected to HAN or JUNMYUNG. JAMES also served as a liaison between the females working in the units and the property managers by fielding calls from the management and coordinating any issues that arose regarding maintenance and inspection. For example, as described above, JAMES spoke with

management at Target Location 8 when there was a possible water leak and JAMES allowed the management to enter the unit. I believe JAMES acted as a buffer between property managers and managers of the prostitution network.

107. Likewise, the co-conspirators registered websites so that the women had free advertisement, communicated on the brothel phones with customers so that the women did not have to establish their own local customer base, rented the brothel locations where the women would perform commercial sex in exchange for a fee, permitted the women to stay overnight in the brothel locations so they did not have to find lodging elsewhere, and at times, paid for airline travel and transportation to and from the brothels and airport so that the women did not have to coordinate travel or pay for the added expense. In the simplest terms, the commercial sex workers only had to show up, work for sex, and get paid. All other aspects of recruiting and making appointments with customers and finding a location for the commercial sex to occur were taken care of by the prostitution network and the co-conspirators. Given the benefits provided to the commercial sex workers by the co-conspirators, I believe that the commercial sex workers were persuaded, induced and enticed to travel to Massachusetts and Virginia to engage in prostitution on behalf of the co-conspirators associated with www.bostontopten10.com and www.browneyesgirlsva.blog.

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CONCLUSION

108. Based on the information described above, I have probable cause to believe that Han Lee, James Lee, and Junmyung Lee have conspired and continue to conspire to knowingly persuade, induce, entice, and coerce one or more individuals to travel in interstate or foreign commerce to engage in prostitution, or in any sexual activity for which any person can be charged with a criminal offense, in violation of 18 U.S.C. § 2422, all in violation of 18 U.S.C. § 371. Moreover, I have probable cause to believe that evidence that crime, in addition to the other crimes identified in paragraph 3 will be found inside each Target Location.

I declare that the foregoing is true and correct.

Zachary Mitlitsky

ZACHARY MITLITSKY
Special Agent
Homeland Security Investigations

Sworn to by telephone in accordance with Fed. R. Cr. P. 4.1 this 6th day of November, 2023

David H. Hennessy

HONORABLE DAVID H. HENNESSY
United States Magistrate Judge



5:08 p.m.

District of Massachusetts