

State of Minnesota
County of Washington

District Court
10th Judicial District

Prosecutor File No. CR-2017-494
Court File No. 82-CR-17-1286

State of Minnesota,
Plaintiff,

COMPLAINT
Warrant

vs.

HONG NMN JING DOB: 10/19/1968

36 AmberLeaf
Irvine, CA 92614

Defendant.

The Complainant submits this complaint to the Court and states that there is probable cause to believe Defendant committed the following offense(s):

COUNT I

Charge: Racketeering-Enterprise-Employed/Assoc/Participate

Minnesota Statute: 609.903.1(1)
Maximum Sentence: 20 years and \$1,000,000
Offense Level: Felony

Offense Date (on or about): 02/02/2015 to 02/21/2017

Control #(ICR#): 17013550

Charge Description: Employed by ro associated with an enterprise and intentionally conducts or participates in the affairs of the enterprise by participating in a pattern of criminal activity

COUNT II

Charge: Aiding and Abetting Engages in the sex trafficking of an individual

Minnesota Statute: 609.322.1a(4), with reference to: 609.322.1a, 609.05.1
Maximum Sentence: 15 years
Offense Level: Felony

Offense Date (on or about): 02/02/2015 to 02/21/2017

Control #(ICR#): 17013550

Charge Description: aiding and abetting and being aided and abetted by another intentionally, and while acting other than as a prostitute or patron, engage in the sex trafficking of an individual

COUNT III

Charge: Aiding and Abetting Promotes Prostitution of an Individual

Minnesota Statute: 609.322.1a(2), with reference to: 609.322.1a, 609.05.1
Maximum Sentence: 15 years and \$30,000
Offense Level: Felony

Offense Date (on or about): 02/02/2015 to 02/21/2017

Control #(ICR#): 17013550

Charge Description: aiding and abetting and being aided and abetted by another intentionally and while acting other than as a prostitute or patron, promoted the prostitution of an individual

COUNT IV

Charge: Conspiracy – Other Labor Trafficking; Individuals age 18 or older.

Minnesota Statute: 609.282.2, with reference to: 609.282.2, 609.175.2

Maximum Sentence: 15 years and \$30,000

Offense Level: Felony

Offense Date (on or about): 02/02/2015 to 02/21/2017

Control #(ICR#): 17013550

Charge Description: conspire to knowingly engage in the labor trafficking of another

COUNT V

Charge: Aiding and Abetting Conceal Criminal Proceeds-Transaction Over \$5000

Minnesota Statute: 609.496.1(1), with reference to: 609.496.2, 609.05.1

Maximum Sentence: 10 years and \$100,000

Offense Level: Felony

Offense Date (on or about): 02/02/2015 to 02/21/2017

Control #(ICR#): 17013550

Charge Description: aiding and abetting and being aided and abetted by another conduct a transaction involving a monetary instrument(s) with a value greater than \$5,000 and defendant knew or had reason to know that the monetary instrument(s) represented or was derived from the proceeds of the commission of a felony, to wit: Sex Trafficking, Promotion of Prostitution

COUNT VI

Charge: Aiding and Abetting Engage in Business of Concealing Criminal Proceeds

Minnesota Statute: 609.497.1, with reference to: 609.497.2, 609.05.1

Maximum Sentence: 20 years/\$1,000,000 or both

Offense Level: Felony

Offense Date (on or about): 02/02/2015 to 02/21/2017

Control #(ICR#): 17013550

Charge Description: aiding and abetting and being aided and abetted by another knowingly initiates, organizes, plans, finances, directs, manages, supervises, or otherwise engages in a business that has as a primary or secondary purpose of concealing money or property that was gained as a direct result of the commission of a felony under this chapter or chapter 152, or of an offense committed in another jurisdiction that would be a felony under this chapter or chapter 152 if committed in Minnesota

STATEMENT OF PROBABLE CAUSE

The Complainant states that the following facts establish probable cause:

Your Complainant is a licensed peace officer in the State of Minnesota and is employed by the Oakdale Police Department. In that capacity, Your Complainant, through training and experience and communication with other detectives, states the following to establish probable cause:

Human trafficking of international victims is a growing trend in the United States. With the emergence of online platforms such as Backpage.com, those responsible for the trafficking are shielded by investigative barriers contained in cyberspace. Operations involving human trafficking of international victims are complex, well-organized and are riddled with many co-conspirators located all over the country. The co-conspirators have clear, well-defined duties to further the sale of sexual acts involving international victims in exchange for monetary compensation. Since many of these criminal enterprises are large and involve operatives in multiple states, local banking institutions are often used to transfer and conceal the profits derived from the prostitution of these victims.

Your Complainant has observed several online, commercial sex solicitations involving international victims in the State of Minnesota. In February 2017, law enforcement detectives from Oakdale, Woodbury, Cottage Grove, Saint Paul and Minneapolis discovered an international conspiracy to traffic Chinese National females from New York and California all over the county, including Minnesota. A criminal enterprise and criminal racketeering activity has been identified. The following establishes the criminal enterprise and the pattern of criminal racketeering activity:

THE DEFENDANTS

HONG NMN JING –DOB: 10-19-1968 (AKA: "Hong Khaja," "Hong Khara," "Jing Hong," "Grace," "Gina"), DEFENDANT JING herein; SOPHIA WANG NAVAS – DOB: 02-11-1968 (AKA: "Sophia N. Navas," "Sophia W. Navas," "Rong W. Navas," "Wang Rong," "Rong Wang"), DEFENDANT NAVAS herein; FANGYAO WU –DOB: 11-16-1993 (AKA: "Michelle Jing," Michelle Wu), DEFENDANT WU herein; DONGZHOU JIANG –DOB: 06-06-1988 (AKA: "Mark"), DEFENDANT JIANG herein, and other persons whose identities are both known and unknown are named as co-conspirators, but not defendants, and members of the criminal enterprise but at this time are not defendants herein.

THE VICTIM/EMPLOYEES

1. L.B. (DOB: 08-28-1973)
2. H.L. (DOB: 05-10-1984)
3. D.M.C. (DOB: 10-22-1978)
4. D.B. (DOB: 02-10-1968)
5. F.Z. (DOB: 10-19-1977)
6. X.I. (DOB: 10-30-1971)

THE RELEVANT PLACES

1. 970 Helena Avenue North, Oakdale, Minnesota in Washington County;
2. 7815 Hemmingway Avenue, Cottage Grove, Minnesota in Washington County;
3. 1990 Burns Avenue, APT#216, St. Paul, Minnesota in Ramsey County;
4. 241 99th Avenue NE, #208, Blaine, Minnesota in Anoka County;

5. 2025 County Road D, Maplewood, Minnesota in Ramsey County;
6. 285 Century Avenue North, Maplewood in Ramsey County;
7. 301 Schelard Parkway, APT#256, St. Louis Park, Minnesota in Hennepin County;
8. 511 40th Street South, APT#113 Fargo, North Dakota in Cass County;
9. 36 Amberleaf, Irvine, California in Orange County;
10. 76 Emerald Clover, Irvine, California in Orange County;
11. 56 Emerald Clover, Irvine, California in Orange County; and
12. 15558 Rhyolite Court, Chino Hills, CA 91709, Orange County California.

THE RELEVANT TIMES

The predicate criminal activity involves and ongoing operation occurring between on or about February 2, 2015 and on or about February 21, 2017.

THE ENTERPRISE: INDIVIDUALS

Defendant Jiang of Minnesota, Defendant Jing, Defendant Navas, Defendant Wu, all of whom are co-conspirators of California, Feng Wu of Corona, New York, who is likewise a co-conspirator and a member of the enterprise, although not charged herein, and other persons whose identities are both known and unknown to law enforcement, constitute an enterprise within the meaning of Minn. Stat. 609.902, Subd. 3 as group of individuals associated in-fact for the purposes hereafter.

THE ENTERPRISE: PURPOSE, FUNCTION, PROFIT

Law enforcement have identified thousands of advertisements on the website "Backpage.com" for "NURU" massages. Law enforcement has learned that "NURU" massages are erotic, skin to skin, body to body massages. Law enforcement has tied phones numbers and email addresses used in the at least 18,200 Backpage.com advertisements to Defendant Jiang, Defendant Jing, Defendant Wu. and Defendant Navas. It is believed that Defendant Jing is the mother of Defendant Wu. Law enforcement has identified additional suspects in connection to this investigation that appear to play a peripheral role in this organizational structure. Due to the ongoing nature of the investigation, some of these individuals are not named. Law enforcement is aware that there are additional suspects that have not yet been identified. Law enforcement has identified several phone numbers, email addresses, bank accounts and multiple aliases for those in the enterprise. Multiple cell phones have been collected, and multiple phone numbers associated with the criminal enterprise have been identified.

Law enforcement arrested Defendant Jiang in Woodbury, Minnesota on 02-20-17 for his involvement in the sex trafficking of a known adult female. Detectives served warrants on Defendant's residence, vehicle and banking accounts and discovered Defendant Jiang was storing more than \$36,000 cash of criminal proceeds related to commercial sex. The money seized in Defendant Jiang's residence was divided in large manila envelopes with various female names on the envelopes. Defendant Jiang was in possession of multiple cell phones. In Defendant Jiang's apartment, law enforcement discovered photographic evidence of "ledgers" which depicted the money made by multiple victims at several locations around the Twin Cities metro and in North Dakota. Detectives identified receipts that reflected Defendant Jiang conducted numerous and repetitive cash deposits into banking accounts believed to belong to Defendant Jing, Defendant Navas, Defendant Wu and other identified co-conspirators.

Purpose and Function

Law enforcement identified that Defendant Jiang was the local operational control of Defendant Jing and Defendant Navas and would coordinate the female victims locally in Minnesota and North Dakota at the

direction of Defendant Jing and Defendant Navas. Law enforcement has discovered evidence, including electronic and cell phone forensic data, that Defendant Jing and Defendant Navas are the operational "leaders" of this criminal organization. Bank records and other photographic information illustrate that Defendant Jiang would deposit cash in the bank accounts believed to belong to Defendant Jing, Defendant Wu and Defendant Navas. Defendant Jiang told law enforcement that Defendant Jing and Defendant Navas are both considered "boss ladies" who are responsible for organizing and coordinating females to travel to various states for the purposes of prostitution.

An administrative subpoena revealed that the accounts relating to thousands of advertisements on Backpage.com used the email addresses of rongwang68@gmail.com and ginajing1116@yahoo.com. Defendant Jiang has positively identified Defendant Jing, Defendant Wu, and Defendant Navas using Facebook.com photographs associated with each "profile." The email address of rongwang68@gmail.com is associated with the Facebook.com profile belonging to Defendant Navas and ginajing1116@yahoo.com is associated with the Facebook.com profile belonging to Defendant Jing. "Rong Wang" is a known alias of Defendant Navas and "Gina Jing" is a known alias of Defendant Jing.

Detectives have confirmed that Defendant Jiang has coordinated the purchasing, renting and leasing of commercial businesses, houses, apartments and hotels to facilitate commercial sex of these victims in the Twin Cities metro area of Minnesota from July 2016 to February 2017. Defendant Jing, Defendant Navas and Defendant Jiang use known massage parlors, private residences and hotels to commit commercial sex trafficking. Defendant Jiang stated that each female victim will rotate locations approximately every two weeks. Defendant Jiang described the brutality of the female victims' experiences in commercial sex work with frequent assaults, rape and robbery by customers. Detectives have recovered photographs of injuries sustained to these female victims from Defendant's cell phone that paint a graphic picture of the victim's experiences. As stated by Defendant Jiang, getting beat and raped is "just part of the business," it is a "high income, high risk" enterprise.

Defendant Jiang stated that he has open conversations with Defendant Jing about the females he controls locally primarily through the phone application "We-Chat." Detectives have recovered these conversations, which confirm knowledge of commercial sex work, coordination of female victims, profits being made and bank accounts for the criminal organization and discussion about incidents of the female victims being assaulted, raped and robbed. Defendant Jiang stated that the criminal enterprise receives a profit of \$50 per commercial sex customer they "send" to the female victim. Defendant Jiang stated that the criminal organization also charges the female victims \$20 a day for housing expenses, \$40 each time they are transported, and the female victims are responsible for purchasing their own food and hotels (if applicable). Law enforcement has discovered "ledgers" that document this payment and profit scheme to further corroborate Defendant Jiang's statement. According to Defendant Jiang, in some instances the females would have their travel and hotels paid for by the enterprise and then would "work off" the amount owed by performing sexual acts in exchange for money. Defendant Jiang stated that all female victims must make \$800 per day, and if the minimum is not met, the female victims are fired. These known and documented conversations reflect that all suspects are involved and aware of the criminal conspiracy to traffic multiple victims in the State of Minnesota and around the county.

Profit: Disbursement and Concealment

An integral part of the criminal enterprise centers on the distribution of criminal proceeds resulting from prostitution. Detective Sullivan and Detective Michener, both from the Saint Paul Police Department Criminal Proceed Unit, have drafted multiple warrants for bank records belonging to Defendant Jiang, Defendant Jing, Defendant Wu and Defendant Navas. According to the documents provided by the executed search warrants, law enforcement learned that a Wells Fargo Bank account (2878) belonging Defendant Jing listed her address at 76 Emerald Clover in Irvine, California. The phone number listed to

the bank account, 949-228-2878, was associated with 586 Backpage.com advertisements, some of which are connected to the Minnesota enterprise. The bank records also reflect that Defendant Jing has self-reported that she is not employed. In the activity from 09-24-2016 to 02-21-2017, Defendant Jing's account shows a total of \$41,849 in deposits and \$60,027 in withdrawals. All of these deposits were in cash. A total of \$8,885 were cash deposits from Anoka and Cottage Grove Wells Fargo locations. Defendant Jiang's residence is located in Anoka County in the City of Blaine and his Wells Fargo bank account was established in Anoka County at the City of Coon Rapids. Additionally, Defendant Jiang was responsible for the "brothel" located in the City of Cottage Grove. A total of \$23,898 cash deposits into this account likely were deposited from an ATM. Defendant Jiang admitted that he deposited cash proceeds from the trafficking of women in Minnesota into Defendant Jing's bank account. Other bank accounts have been identified and information is forthcoming.

The Wells Fargo Bank account (8388) belonging to Defendant Jiang shows that he reports his current employment as of 08-05-2016 as "Peony Massage." In the activity from 10-10-2016 and 02-01-2017, the account belonging to Defendant Jiang had \$33,444 in deposits (\$29,285 cash) and \$27,201 in withdrawals. The cash deposits were conducted at multiple Wells Fargo locations in the Twin Cities metro area, North Dakota and New York. Law enforcement was able to recover several images, which appear to be "screenshots" of deposit slips bearing the names and bank account information of Defendant Jing, Defendant Wu and Defendant Navas on Defendant Jiang's cell phone. Defendant Jiang stated that he deposited cash into the co-conspirators' bank, accounts which resulted from the money derived from prostitution.

The Wells Fargo Bank account (5205) belonging to "Michelle Jing" (AKA Defendant Wu) shows that on 06-24-2016, the account had a balance of \$50.00. Between 06-24-2016 and 02-28-2017, the bank account belonging to Defendant Wu's account had \$861,539 in deposits and \$808,731 in withdrawals. A total of \$809,804 was cash deposits and \$670,000 came from deposits from a Bank of America account (1733) also belonging to Defendant Wu. Bank records showed that the account belonging to Defendant Wu issued \$23,100 in checks to Defendant Jing and \$15,000 in checks to Defendant Navas. Defendant Wu also deposited a check in the amount of \$7000 from Defendant Navas. There were two large deposits via check from Defendant Wu to "Michelle Jing" for \$463,000 and \$167,000 and an outgoing wire transfer to Fidelity National Title for \$743,107.95. It is believed the \$743,107.95 wire transfer was the payment for a residence. Law enforcement believes the purchase of the residence used some or all proceeds from the money derived from trafficking females in the United States.

Search warrant information into Defendant Navas is still pending, however, Defendant Jiang stated that he deposited cash as a result of money derived from trafficking women into the bank accounts of Defendant Navas.

Law Enforcement believes that Defendant Jing, her daughter, Defendant Wu, and Defendant Navas make up the country-wide operational control center responsible for coordinating the sex trafficking of several different females. Defendant Jiang appears to be responsible for regional control in Minnesota and North Dakota. The operational control of this sex trafficking organization is occurring around Orange County, California. Defendant Jing and Defendant Navas post thousands of advertisements on Backpage.com and communicate with all the prospective customers. Defendant Jing will coordinate travel itineraries for these females and fly them into areas such as the Twin Cities metro of Minnesota where she has local operational control with persons such as Defendant Jiang. Text messages and "We-Chat" conversation reveals that Defendant Jing will send travel itineraries and contact information to Defendant Jiang. Defendant Jing also sends address and pictures of several apartments, townhomes and houses for Defendant Jiang to "check out." Defendant Jiang transports the females from the airport and to various locations for commercial sex, furnishes the apartments, collects the money, calculates the profits and costs associated with each female, and deposits the money in the bank accounts of Defendant Jing, Defendant

Wu, and Defendant Navas. Defendant Jiang stated that cash deposited into the aforementioned ~~Back~~ accounts was a product of proceeds derived from prostitution.

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Prior History

Defendant Jing was arrested for running a brothel in Irvine, California on 06-01-2016. As a result of the arrest, other female victims were recovered. According to the police reports, once Defendant Jing discovered the "customer" was a police officer, Defendant Jing yelled to others in the brothel, "It's the cops. Don't say anything okay?" Defendant Jing was booked in the Santa Ana City Jail. Defendant Jing listed her telephone as 949-220-6666. That phone number listed to Defendant Jing was associated with over 4,000 Backpage.com advertisements. Also on the booking form, Defendant Jing stated her "next of kin" was Defendant Navas with a phone number of 626-201-8887. The phone number listed as belonging to Defendant Navas is associated with over 97 Backpage.com advertisements in Orange County, California.

PATTERN OF CRIMINAL RACKETEERING ACTIVITY

The members of the criminal enterprise engaged in a pattern of criminal racketeering activity, as defined by Minnesota Statute 609.902, Subd. 6, which consisted of three or more incidents of racketeering conduct during the relevant time period stated above, including but not limited to: sex trafficking pursuant to Minn. Stat. 609.322, Subd. 1(a)(4); promotion of prostitution pursuant to Minn. Stat. 609.322, Subd. 1(a)(2), concealing criminal proceeds pursuant to Minn. Stat. 609.496, Subd. 1(2), engaging in business of concealing criminal proceeds pursuant to Minn. Stat. 609.497, Subd. 1, and conspiracy to commit labor trafficking pursuant to Minn. Stat. 609.282, Subd. 2. The following felony activity is chronological in time:

Blaine, Minnesota—"Peony Massage"

On 08-20-2016, the Blaine Police Department was dispatched to Peony Massage located at 11724 Ulysses Street NE, in the City of Blaine, Anoka County on a report of prostitution. Upon arrival, Officer Koch made contact with the reporting party identified as A.T.A. (DOB: 11-06-1983) who stated that he had paid \$70 for a one-hour massage and approximately five minutes into the massage, the female masseuse offered to perform sexual acts in exchange for money. At the business, Officer Koch located an Asian female identified as F.L. (DOB: 11-15-1974). F.L. told Officer Koch that she did not work at the business and was just present to "install security cameras." A.T.A. stated that F.L. was working at the front desk and accepted his payment upon arrival. A short time later, Officer Koch saw another Asian female, later identified as L.B. (DOB: 08-28-1973), who matched the description of the female masseuse given by A.T.A. L.B. stated that she did not speak English. L.B. contacted the owner for Officer Koch. The owner of the business was identified as Defendant Jiang. Defendant Jiang told Officer Koch that both F.L. and L.B. were certified massage therapists and provided little information. As a result of the reports, Peony Massage was closed.

On 02-21-2017, Law enforcement executed a search warrant at Defendant Jiang's residence. Inside, law enforcement discovered numerous documents pertaining to Peony Massage. A search of Defendant Jiang's phone revealed a contract for the sale of the business from Defendant Navas to a known individual prior to complaint from A.T.A. Law enforcement identified the Backpage.com advertisements for Peony Massage and an administrative subpoena was requested. Law enforcement learned from the subpoena that phone number of 916-666-0656 was listed to Defendant Jing and the email address, rongwang68@gmail.com, belonged to Defendant Navas.

On 03-23-2017, Defendant Jiang told law enforcement that he had purchased the business in an attempt to make money and help his Aunt in April of 2016. Shortly after purchasing the business, Defendant Jiang attempted to sell the business because he was losing money. Defendant Jiang placed an advertisement in on online, local Chinese classified service. Receiving no reasonable offers, Defendant Jiang learned that

his aunt had contacted Defendant Navas in an attempt to see if she wanted to purchase the business. Defendant Jiang stated that his aunt knew Defendant Navas from California. Defendant Jing and Defendant Navas agreed to purchase the Peony Massage for \$28,000 and provided a \$4,800 deposit to Defendant Jiang. Shortly after selling the business, Defendant Jiang stated that he learned that activity inside Peony Massage turned from legitimate therapeutic massages to prostitution. Defendant Jiang reported seeing condoms and in speaking with the female employees confirmed that prostitution was occurring. Defendant Jiang was a partner to Defendant Jing and Defendant Navas. According to Defendant Jiang, he was responsible for collecting the money from the females inside three to four times a week and deposited the proceeds in to the bank accounts of Defendant Jing, Defendant Wu and Defendant Navas. Defendant Jiang would pick the females up from the airport at the direction of Defendant Jing. Defendant Jiang stated that he estimated 5-6 females were involved in prostitution at Peony Massage and once their rotation was finished, they asked Defendant Navas if they could stay in Minnesota. The females were then rotated to local hotels in Bloomington, Golden Valley, and Plymouth. Defendant Jiang would receive a payment of \$500-\$800 per week for his services from the enterprise. Defendant Jiang would collect money from the females that were the result of money derived from of prostitution, deposit the money into co-conspirators' bank accounts and pay himself his fee. In addition to his fee, Defendant Jiang stated that he collected money from the females towards his payment for selling Peony Massage to Defendant Jing and Defendant Navas.

Saint Paul—"1990 Burns"

On 12-21-2016, the St. Paul Police Department Human Trafficking Unit received a tip about possible human trafficking occurring at the Terra Pointe Apartments located at 1990 Burns in the City of St. Paul. Sgt. Johnson spoke with apartment manager who provided a copy of the lease of #216, the suspect apartment number. Sgt. Johnson learned that Defendant Jiang and "Chunguang Zhou" were both on the lease. During surveillance, law enforcement members were able to identify a male, T.G.H. (DOB: 02-04-1971), who admitted that he received a sex act from an Asian female inside the apartment in exchange for money. Sgt. Peterson attempted to make contact with the apartment, however, there was no answer.

On 01-13-17, Officer Hartnett conducted undercover surveillance on apartment #216 and made contact with a male individual identified as J.R.C. (DOB: 06-18-1982) leaving the apartment. J.R.C. admitted that he received a sex act in exchange for money. Officer Harnett texted the phone number 702-278-6120 and was directed to 1990 Burns and to call #216 from the lobby of the apartment. Officer Hartnett made contact with apartment #216 and discovered two females identified as H.L. (DOB: 05-10-1984), and D.M.C. (DOB: 10-22-1978). Both females were wearing lingerie. The bedroom only contained a mattress on the floor. Both H.L. and D.M.C. didn't speak English and said they did not have their passports because they "left them with a friend." While there, Officer Hartnett observed that the cell phones belonging to both females were ringing with displaying the phone number of 651-600-9056 during the calls. Law enforcement later learned that the phone number belongs to Defendant Jiang.

Defendant Jiang told law enforcement that upon selling of Peony Massage, Defendant Jing rented an apartment in the City of Maplewood for the purposes of prostitution. Defendant Jiang stated that prostitution was occurring at this apartment for less than one month and due to police contact, Defendant Jing began to look for another apartment. Defendant Jiang stated that he learned of 1990 Burns from Defendant Jing. Defendant Jiang had his friend "Chunguang Zhou," sign a lease in an attempt to conceal his identity with the apartment. After a robbery of the females in December 2016, Defendant Jiang joined the lease so he could communicate with the lease office regarding the security of the apartment. In exchange for signing the lease, "Chunguang Zhou" was paid \$800 per/month. Defendant Jiang admitted that between the months of October 2016 through January 2017, ten females were rotated through 1990 Burns in St. Paul. Defendant Jiang picked each of these females up from the airport and collected money. Defendant Jiang stated that Defendant Jing paid for the furnishing of the apartment. Bank records

belonging to Defendant Jiang show that in the month law enforcement made contact with the two females in the apartment, he paid \$1,240 in rent on 12-02-2016. On Defendant Jiang's phone, law enforcement discovered text message communication of "customers" responding to the advertisements. Also, numerous pictures with multiple vantage points of the exterior of the apartment were recovered on his cell phone. The text messages confirmed prostitution was occurring at the apartment during this time. The phone number 702-278-6120, which was the number connected to the backpage.com, had 822 advertisements online. According to the results of the administrative subpoena, this phone number is associated with the email address belonging to Defendant Navas.

Defendant Jiang admitted that he deposited money for Defendant Jing, Defendant Wu and Defendant Navas during this time. All money deposited into said accounts was derived from prostitution at 1990 Burns.

Oakdale, Minnesota—"970 Helena Ave North" and Saint Louis Park — "301 Shelard Avenue"

On 02-15-2017, Woodbury Police Detective Paul Kroshus was advised of a large human trafficking operation occurring in the City of St. Louis Park. Sgt. Grant Snyder of the Minneapolis Police Department had received information that eight human trafficking victims had just arrived to the Twin Cities metro area for the purposes of commercial sexual exploitation. The address of the suspected sex trafficking was an apartment located at 301 Shelard Avenue, #256. A search warrant was drafted and executed in Hennepin County for the suspect address. Sgt. Grant Snyder, and other law enforcement officers, led the operation in Saint Louis Park. Inside the apartment, law enforcement recovered two females who did not speak English. The apartment had two bedrooms and both bedrooms had a mattress on the floor with a single nightstand by each bed. Inside the nightstand, police found condoms and lubricant. Police also found discarded condoms located in the apartment garbage can. The apartment had a Wi-Fi security camera installed that monitored the two females inside. The females were interviewed. One female stated that when she arrived in the United States she met an unidentified person in "California" who was responsible for coordinating her destinations. Both females were not in possession of their passport and both stated that their passports were taken upon arrival.

Detective Kroshus and Oakdale Detective Ryan Stuart were made aware that advertisements similar to the St. Louis Park advertisement were active in Washington County. On 02-17-2017, Detective Stuart discovered a commercial sex advertisement posted in the City of Oakdale, Washington County. Detective Stuart conducted undercover communication with the phone number listed in the advertisement. Detective Stuart obtained an address of a hotel located at 970 Helena Ave North in the City of Oakdale, Washington County. Detective Stuart contacted the hotel and learned a female later identified as D.B. (DOB: 02-10-1968) had rented room #221. The goal of the operation was to verify that commercial sex acts were occurring and to identify a potential trafficker associated with the exploitation of the female. Law enforcement conducted hotel hallway and parking lot surveillance. During the surveillance, Detective Kroshus and Detective Stuart observed several males enter the room and leave approximately fifteen minutes later. In order to establish that sex acts were occurring in the hotel room, law enforcement conducted a traffic stop on an individual that had exited the suspect hotel room and left the hotel premises. The sole occupant in the vehicle was identified as D.K. D.K. stated that he responded to an advertisement on Backpage.com with the listed phone number 949-228-2878. D.K. was told to go to the room #221. D.K. stated he had vaginal sex with an Asian female in exchange for \$150.

Shortly after the traffic stop and interview of D.K., customer traffic decreased significantly. Law enforcement, still conducting surveillance, were attempting to identify the trafficker and were in the process of setting up service and placement for the female victim. The female victim, D.B., exited the hotel room and was checking out at the front desk. Due to the traffic of persons in the lobby area and multiple vehicles

driving in the parking lot, law enforcement was unable to see what vehicle D.B. had left in.

On 02-18-2017, Detective Stuart found the same commercial sex advertisement from Oakdale posted again. Detective Stuart again initiated undercover communication with the phone number in the advertisement. This time, Detective Stuart was given three locations: Maplewood, Brooklyn Center and Cottage Grove. Due to the proximity of the City of Maplewood to Oakdale, Detective Stuart asked for the address for the Maplewood location and was provided the location of a hotel located at 2025 County Road D. With the knowledge that sexual exploitation was occurring inside the hotel room, Detective Kroshus called hotel management to have the female evicted from the room. Services and placement for the female victim was secured. The female victim, later identified as the same victim D.B., was evicted. Shortly after her eviction, a vehicle with California license plates (7NSZ367) drove up and picked up D.B. Surveillance followed the vehicle through the City of Woodbury. The female victim was dropped off at Live Inn Suites in the City of Maplewood. The female victim was recovered. The vehicle was stopped and the suspect driver, Defendant Jiang was arrested in Woodbury, MN.

Defendant Jiang admitted that he picked D.B. up from the airport at the direction of Defendant Jing. Defendant Jiang then transported D.B. to Oakdale for the purposes of prostitution. Defendant Jiang said that Defendant Jing coordinated commercial sex advertisements and arranged for "customers" via Backpage.com. Defendant Jiang picked up money from D.B. when he moved her from Oakdale to Maplewood. Law enforcement searched the defendant's vehicle and recovered in excess of \$4,000 cash in a manila envelope. According to the administrative subpoena from Backpage.com, two phone numbers were identified belonging to the account, one of which was 949-228-2878, which law enforcement believes belongs to Defendant Jing. A total of 546 advertisements are associated the Backpage.com advertisement associated with the advertisement in Oakdale. The other phone number, whose owner has not been identified, is associated with 742 advertisements.

Cottage Grove—"7815 Hemmingway"

02-17-2017, while the undercover operation was occurring in Oakdale, Detective Kroshus learned of another operation occurring in the City of Cottage Grove. Detective Kroshus conducted undercover communication with the phone number 916-666-0656, which was listed in the Backpage.com advertisement and was provided an address of 7815 Hemmingway in Cottage Grove. This information was provided to Sgt. Grant Snyder. Sgt. Grant Snyder, Detective Landkamer and Detective Clausen observed multiple vehicles around the townhome and higher than normal traffic for the area. At one point, Detective Clausen observed a female come from the address and direct males into the residence. A search warrant for the residence was drafted.

On 02-21-2017, Officer Zeterlu made contact with L.S. (DOB: 08-28-1948). L.S., a concerned citizen, believed sex trafficking was occurring at the suspect address. L.S. stated that on 02-18-2017 she went to visit an old friend who she had thought still lived at the address. When she arrived there she was greeted by an Asian female who waived her inside. L.S. believed that the female was a possibly a "caretaker" for her friend. L.S. said the female took her upstairs and had her sit on a bed. L.S. believed that the female was a prostitute and quickly left.

On 02-22-2017, pursuant to a search warrant, law enforcement from Cottage Grove, Woodbury, and Oakdale executed a warrant as the address. Inside, law enforcement discovered three Asian females later identified as D.B. (victim from Oakdale), F.Z. (DOB: 10-19-1977) and X.I. (DOB: 10-30-1971). Earlier in the day, D.B. was placed at a shelter. Law enforcement learned that D.B. had left the shelter. All three females recovered did not speak English. Inside the town home, detectives discovered a small table and two chairs with no other furniture on the main level. Upstairs, the two bedrooms were furnished each with a mattress on the floor and nightstand. Law enforcement discovered lubrication and unused condoms inside.

Inside the garbage can, which was located in the garage, law enforcement discovered "hundreds" of used condoms.

Defendant Jiang stated that due to the police activity at 1990 Burns, Defendant Jing advised that another location was needed for prostitution. Defendant Jiang told Defendant Jing that he knew of a place they could rent in Cottage Grove. Defendant Jiang stated that once Defendant Jing agreed to rent the townhome, Defendant Jiang transferred the furniture from 1990 Burns to 7815 Hemmingway. Defendant Jiang admitted that he, at the request of Defendant Jing, picked up approximately three females from the airport to Cottage Grove.

During a search of Defendant's Jiang's phone, a video message was sent to Defendant Jing's "We-Chat" account. The video is of a panoramic view from the entrance of 7815 Hemmingway. Also located were Google Map "screenshots" depicting directions from 1990 Burns to 7815 Hemmingway. In some advertisements, Defendant Jiang would communicate with "customers" and give the suspect address. On some occasions, the "customers" wanted to talk on the phone before a "date" was set up. In text messages from Defendant Jiang's phone, he tells those customers to call 916-666-0656. This number has been identified as belonging to Defendant Jing. Defendant Jiang admitted that he deposited proceeds from the trafficking of females into the bank accounts belonging to Defendant Jing, Defendant Wu, and Defendant Navas. Some cash deposits into Defendant Jiang's bank account occurred at the Cottage Grove branch.

Fargo, North Dakota, and other locations in the United States

While searching Defendant's Jiang's cell phone, law enforcement discovered that the phone belonging to Defendant Jiang was responding and communicating with potential customers relating to prostitution from a Backpage.com advertisements. "We-Chat" communication between Defendant Jing and Defendant Jiang show conversations regarding the "Fargo" address and the trafficking of women to a known location. These conversations include discussions enterprise operations at the St. Paul and Cottage Grove addresses. Based on the text communications and photographic information it is believed that Defendant Jiang was operating the Twin City metro locations during the same time as the "Fargo" location.

Law enforcement was able to examine Backpage.com subpoenas connected to the accounts created belonging to the email addresses of rongwang68@gmail.com and ginajing1116@yahoo.com. According to the administrative subpoena, similar advertisements were found the following states: California, Nevada, Utah, Idaho, Colorado, Arizona, North Dakota, Nebraska, Kansas, Oklahoma, Texas, Iowa, Missouri, Arkansas, Louisiana, Mississippi, Alabama, Georgia, South Carolina, North Carolina, Tennessee, Kentucky, Illinois, Wisconsin, Indiana, Ohio, Pennsylvania, New Jersey and New York.

As of the date of this complaint, phone numbers and Backpage.com advertisements associated with accounts belonging to Defendant Jing and Defendant Navas are still operational and include the Twin Cities metro area.

SIGNATURES AND APPROVALS

Complainant requests that Defendant, subject to bail or conditions of release, be:
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

Complainant declares under penalty of perjury that everything stated in this document is true and correct. Minn. Stat. § 358.116; Minn. R. Crim. P. 2.01, subds. 1, 2.

Complainant

Scott Olson
Detective Sergeant
1584 Hadley Avenue N
Oakdale, MN 55128
Badge: 133

Electronically Signed:
03/28/2017 12:12 PM
Washington County, Minnesota

Being authorized to prosecute the offenses charged, I approve this complaint.

Prosecuting Attorney

Imran Ali
PO Box 6
15015 62nd Street North
Stillwater, MN 55082
(651) 430-6115

Electronically Signed:
03/28/2017 11:34 AM

FINDING OF PROBABLE CAUSE

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense(s).

SUMMONS

THEREFORE YOU, THE DEFENDANT, ARE SUMMONED to appear on _____, _____ at _____ AM/PM before the above-named court at 14949 62nd Street N PO Box 3802, Stillwater, MN 55082-3802 to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

WARRANT

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I order, in the name of the State of Minnesota, that the Defendant be apprehended and arrested without delay and brought promptly before the court (if in session), and if not, before a Judge or Judicial Officer of such court without unnecessary delay, and in any event not later than 36 hours after the arrest or as soon as such Judge or Judicial Officer is available to be dealt with according to law.

Execute in MN Only *Execute Nationwide* *Execute in Border States*

This warrant may be executed at any time of the day or night and on Sundays or legal holidays.

ORDER OF DETENTION

Since the Defendant is already in custody, I order, subject to bail or conditions of release, that the Defendant continue to be detained pending further proceedings.

Bail: \$
Conditions of Release:

This complaint, duly subscribed and sworn to or signed under penalty of perjury, is issued by the undersigned Judicial Officer as of the following date: March 28, 2017.

Judicial Officer B W Ekstrum Electronically Signed: 03/28/2017 02:17 PM
District Court Judge

Sworn testimony has been given before the Judicial Officer by the following witnesses:

**COUNTY OF WASHINGTON
STATE OF MINNESOTA**

State of Minnesota

Plaintiff
vs.

Hong NMN Jing
Defendant

*LAW ENFORCEMENT OFFICER RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this Warrant
upon the Defendant herein named.*

Signature of Authorized Service Agent: