

A F F I D A V I T

I, Heith R. Janke, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), United States Department of Justice, and have been so employed since September 2004. I am currently assigned to the Kansas City Division of the FBI, specifically to the Public Corruption/Civil Rights program. Presently I am investigating an Asian prostitution criminal enterprise, the facts of which are set forth in this affidavit.

2. This affidavit is made in support of a complaint charging LING XU, date of birth xxxxxxxx xx, 1961, Social Security Account Number xxx-xx-5972, ZHONG YAN LIU, date of birth xxxxxxxx x, 1971, Social Security Account Number xxx-xx-4213; CHENG TANG date of birth xxxxxxxx xx, 1985, Social Security Account Number xxx-xx-3932; and HONGMEI MADOLE, date of birth xxxxxxxx x, 1976, Social Security Account Number xxx-xx-4533, aiding and abetting each other and others, did knowingly transport or attempt to transport at least one individual in interstate or foreign commerce with intent that such individual engage in prostitution, or in any sexual activity for with which any person can be charged with a criminal offense, in violation of §§ 18 U.S.C. § 2421 and 2.

I. Businesses

3. Xu, Liu, and Tang operate two massage parlors and a residence, in which their massage parlor employees, originally from China, are flown from the states of California, New York, Nevada and Arizona to the Kansas City International Airport, which is located in Kansas City, Missouri. The Asian females are then transported by the subjects from Kansas City, Missouri, to their respective massage parlor locations in Johnson County, Kansas.

a. Their first business, China Rose Massage, 9966 W. 87th Street, Overland Park, Kansas, was issued a Massage Establishment License by the City of Overland Park, Kansas. The application for the license was signed by Ling Xu, as manager. Hongmei Madole also worked at China Rose Massage, before opening her own massage parlor, as described below. The advertised hours of operation at China Rose Massage is seven days a week from 9:00 a.m. until 11:00 p.m.

b. Xiu, Liu, and Tang's second business is China Villa Massage, 7034 W. 105th Street, Overland Park, Kansas. On December 21, 2005, Cheng Tang, who was accompanied by Zhong Yan Liu applied for a massage business license for the China Villa Massage. On March 17, 2006, Ling Xu applied with the City of Overland Park, Kansas, for a therapist license for China Villa Massage. Cheng Tang signed the application as the manager of China Villa Massage. The advertised hours of operation at China Villa Massage is seven days a week from 9:00 a.m. until 11:00 p.m.

c. Xiu, Liu, and Tang also operate a residence located at xxxx xxxxxxxx, Overland Park, Kansas. This residence is believed to be utilized both for prostitution and to house the Asian females that work at China Rose Massage.

4. Madole is the owner of Asian Touch Massage, 122 S. Clairborne Road, Olathe, Kansas. On February 16, 2006, Hongmei Madole signed as the owner of a City of Olathe, Kansas, Massage Establishment Application requesting to open Asian Touch Massage at 122 S. Clairborne, Olathe, Kansas. Madole was granted a Massage Establishment License on March 14, 2006. The advertised hours at Asian Touch is seven days a week from 9:00 a.m. until 11:00 p.m.

II. Transportation

5. The subjects utilize the Kansas City International Airport (KCI), located in Kansas City, Missouri, to transport their employees to their businesses from states such as California, Nevada, New York, and Arizona. On the evening of February 15, 2007, and morning of February 16, 2007, surveillance was conducted at China Rose Massage, along with other businesses in this investigation. During the surveillance Ling Xu was followed from Johnson County, Kansas, to KCI. Zhong Yan Liu flew from Los Angeles, California, with a known Asian female. Xu and Liu transported her from KCI to xxxx xxxxxxxx, Overland Park, Kansas, a residence utilized to house the Asian females employed at China Rose Massage.

6. On May 3, 2007, surveillance was conducted at KCI where an Asian female exited a Southwest Airlines Flight that had arrived from Las Vegas, Nevada. She was then transported by Liu and Xu from KCI to China Villa Massage. The Asian female was dropped off at China Villa Massage at 1:30 a.m.

7. On September 11, 2006, Tang booked purchased a ticket for a known Chinese national female on Southwest Airlines. This female was later licensed at both China Rose Massage and China Villa Massage.

8. On June 22, 2005, Xu booked an airline ticket for a massage parlor employee that has been licensed at both China Rose Massage and China Villa Massage.

III. Advertising

9. The PITCH Weekly is a free newspaper placed throughout the Kansas City Metro area, both in Missouri and Kansas. The PITCH Weekly is located at 1701 Main, Kansas City, Missouri. The PITCH Weekly also has an internet website www.pitch.com. This is an internet website on the

world wide web that can be utilized by anyone, from any state including Missouri, that has an internet connection. A search of www.pitch.com reveals that there are classified ads for "massage". Upon accessing that link, an individual is then transferred to www.kcbackpage.com. A review of www.kcbackpage.com reveals that China Rose Massage, China Villa Massage and Asian Touch Massage advertise on that website.

IV. Citizen Complaints

10. There have been numerous complaints made regarding the massage parlors. For example, in September 2006, Overland Park Police Department (OPPD) received an anonymous letter that was postmarked Long Beach, California, and dated September 14, 2006. The letter was written in Chinese, but contained an English title of "Prostitution." The letter stated that the boss and his woman at China Rose were engaging in coercing, enticing, and exploiting Chinese women to reap a fortune for themselves, while sending the United States currency to mainland China. As a second example, the Greater Kansas City Crimestoppers received a telephonic complaint on November 25, 2006. The caller stated that massage parlor, located at 9966 W. 87th Street, Overland Park, Kansas (address for China Rose Massage) is run by Ling Ziu and Lucky Liu. The caller stated that they smuggle girls from Fuzhou, China, between the ages of twenty to twenty-eight, to the United States to work for them. The caller advised that the girls are rotated every twenty days through San Francisco, California. The caller further advised that the two suspects run massage parlors at 10220 W. 87th Street (address for Lily Massage) and 7034 W. 105th Street (address for China Villa Massage).

V. Trash Pulls

11. Trash covers conducted at China Villa Massage and at xxxx xxxxxxxx, Overland Park, Kansas, demonstrate active prostitution, interstate travel, and the transferring of U.S. Currency to China. It is suspected that the garbage recovered from xxxx xxxxxxxx is not only the personal garbage of the residence but of the business China Rose Massage as well. This conclusion is based on surveillance which has not observed the business to put out trash, but instead to take trash to the residence for disposal. At xxxx xxxxxxxx, during seven trash covers conducted from February 13, 2007, until May 1, 2007, the evidence recovered from the garbage included 1,164 empty condom wrappers, along with several used condoms. Those seven trash covers also revealed evidence for eight airline flights to Kansas City, Missouri, from the cities of Los Angeles, California, Phoenix, Arizona, New York, New York, and Las Vegas, Nevada. Also recovered from xxxx xxxxxxxx were Western Union receipts totaling \$26,000.00 for money wired to China, with one receipt demonstrating that the receiver was in Australia.

12. Garbage collected at China Villa Massage also consisted of empty condom wrappers, used condoms, Western Union receipts for monies wired to China, and an airline flight record detailing interstate travel from Oakland, California, to KCI.

VI. Undercover Operation

13. An FBI Undercover Employee (hereafter UCE) entered China Rose Massage on February 6, 2007, and March 21, 2007, for a massage. UCE was solicited, but did not engage in a sexual acts with the Asian females during both occasions. During both massages, the Asian females advised UCE that they were from Los Angeles, California.

14. The UCE entered China Villa Massage on January 25, 2007, February 15, 2007, and May 3, 2007, for massages. The UCE was solicited for prostitution on all three occasions. The solicitation for a sexual act received on May 3, 2007, came from the Asian female who had earlier in the day been transported by Liu and Xu from KCI to China Villa Massage. (See ¶ 6).

15. The UCE entered Asian Touch Massage on January 23, 2007, January 27, 2007, and May 4, 2007. On January 23, 2007, UCE received a sexual solicitation from Hongmei Madole. On January 27, 2007, UCE received a sexual solicitation from a known Asian female. She had a Southwest Airlines flight booked on April 27, 2006, for her to travel from Los Angeles, California, to Kansas City, Missouri. The flight details indicate that the purchaser for the flight was Hongmei Zhou (Madole), who listed her telephone number and an e-mail address when making the flight reservation. Surveillance and further investigation has established that Hongmei Madole and her husband transported Asian females to and from KCI to Asian Touch Massage.

VII. Proceeds

16. Xu, Liu, Tang, and Zhan Jun Wang¹ have been involved in the wiring of money to China through Western Union. The investigation has not developed any evidence that would indicate any other source of the money wired to China apart from China Rose Massage and China Villa Massage. Only two known locations have been subpoenaed for Western Union wire transfers conducted by these subjects. From the time period of August 2005 through December 2006, Xu, Liu, Tang, and Wang sent Western Union wire transfers totaling \$83,300.00 to China from those two locations.

¹ Zhan Jun Wang is the former husband to Ling Xu. Wang's name has appeared on a telephone bill recovered from xxxx xxxxxxx, Overland Park, Kansas.

Under penalty of perjury, I swear that the foregoing is true and correct to the best of my knowledge, information and belief.

Heith R. Janke
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this ____ day of May, 2007.

Honorable Robert E. Larsen
United States Magistrate Judge