

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 24cr10035
)	
v.)	Violations:
)	
(1) HAN LEE, a/k/a "Hana,")	<u>Count One</u> : Conspiracy to Persuade, Induce,
(2) JAMES LEE, and)	Entice, and Coerce One or More Individuals to
(3) JUNMYUNG LEE,)	Travel in Interstate or Foreign Commerce to
)	Engage in Prostitution
Defendants)	(18 U.S.C. § 371)
)	
)	<u>Count Two</u> : Money Laundering Conspiracy
)	(18 U.S.C. § 1956(h))
)	
)	<u>Conspiracy Forfeiture Allegation</u> :
)	(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C.
)	§ 2461(c))
)	
)	<u>Money Laundering Forfeiture Allegation</u> :
)	(18 U.S.C. § 982(a)(1))
)	

INDICTMENT

At all times relevant to this Indictment:

General Allegations

Background

1. HAN LEE a/k/a "Hana" ("HAN") and JUNMYUNG LEE ("JUNMYUNG") were residents of Massachusetts.
2. JAMES LEE ("JAMES") was a resident of California.
3. The "Boston Brothel Phone" was a phone number used by the co-conspirators to communicate with and arrange appointments for sex buyers to engage in commercial sex with one of the women advertised on www.bostontopten10.com at one of the Boston Top Ten brothel locations.

4. The “Virginia Brothel Phone” was one of the phone numbers used by the co-conspirators to communicate with and arrange appointments for sex buyers to engage in commercial sex with one of the women advertised on www.browneyesgirlsva.blog at one of the Brown Eyes Girls’ brothel locations.

5. Female A was a female who traveled to Massachusetts from another state to engage in prostitution. Female A was advertised on the www.bostontopten10.com website and was recovered on November 8, 2023 from the brothel located at [REDACTED] Street, Unit [REDACTED] in Cambridge, Massachusetts.

6. Female B was a female who traveled to Massachusetts from another state to engage in prostitution. Female B was advertised on the www.bostontopten10.com website and was recovered on November 8, 2023 from the brothel located at [REDACTED] Street, Unit [REDACTED] in Cambridge, Massachusetts.

7. Female C was a female who traveled to Massachusetts from another state to engage in prostitution. Female C was advertised on the www.bostontopten10.com website and was recovered on November 8, 2023 from the brothel located at [REDACTED] Street, Unit [REDACTED] in Cambridge, Massachusetts.

8. Female D was a female who traveled to Massachusetts from another state to engage in prostitution. Female D was advertised on the www.bostontopten10.com website and was recovered on November 8, 2023 from the brothel located at [REDACTED] Street, Unit [REDACTED] in Watertown, Massachusetts.

9. Female E was a female who traveled to Virginia from another state to engage in prostitution. Female E was advertised on the www.browneyesgirlsva.blog website and was recovered on November 8, 2023 from the brothel located at [REDACTED] Drive, Unit [REDACTED] in

Tysons, Virginia.

10. Female F was a female who traveled to Virginia from another state to engage in prostitution. Female F was advertised on the www.browneyesgirlsva.blog website and was recovered on November 8, 2023 from the brothel located at [REDACTED] Avenue, Unit [REDACTED] Fairfax, Virginia.

The Websites

11. The organization advertised its prostitution network primarily on two websites. Each of the websites advertised appointments with women in either greater Boston/Cambridge/Watertown (www.bostontopten10.com) or eastern Virginia (www.browneyesgirlsva.blog) (collectively, the “brothel websites”). Although www.bostontopten10.com claimed “it is expressly not a site that in any way solicits, encourages, nor sanctions any sexual activity” and www.browneyesgirlsva.blog claimed “[t]his site does not promote prostitution nor is this advertisement or any content therein an offer for prostitution,” both sites did in fact promote and advertise prostitution. Both websites advertised the services generally and advertised the specific commercial sex workers, using stage names or nicknames, semi-nude and nude photographs, and brief descriptions of the measurements of the women. The women advertised on the websites were updated frequently, with postings that included “open” or “coming soon,” showing a frequent rotation of women that kept the demand, and therefore profits, high for the prostitution network.

12. Each website described the process that a “client” must undertake to book appointments with the advertised women. The process was similar for both websites. Typically, first-time clients were required to complete a form on the websites. For www.bostontopten10.com, the form included the clients providing their names, email address,

phone number, employer, and reference (that reference being either another brothel organization or an existing customer of this prostitution network), if they have one. For www.browneyesgirlsva.blog, clients also were expected to fill out a verification form as a first-time customer and were instructed to contact one of two or three phone numbers listed on the website. After their information was verified, the clients were able to book appointments. Further communication about the actual appointments – e.g., time, duration, location, and other logistics – generally occurred via text message exchanges with telephone numbers, i.e., the Boston Brothel Phone and/or the Virginia Brothel Phone each with local area codes, posted on or associated with the websites.

13. Men paid for sex with women advertised on the Boston Top Ten website at multiple high-end apartments (hereinafter, “brothels” or “apartments”) in Cambridge and Watertown, at least four of which were active until November 8, 2023. Men paid for sex with women advertised on the Brown Eyes Girls website at eastern Virginia apartments, including two brothels located in Tysons and Fairfax, Virginia, both of which were active until November 8, 2023.

14. The websites, which served as free advertisement for the commercial sex workers traveling to Massachusetts and Virginia to engage in commercial sex, were generally maintained and updated by HAN who had access to the photographs of the women.

The Prostitution Ring

15. HAN was the manager of this East Coast prostitution network. For the prostitution ring to be successful, she needed to recruit women interested in traveling from another state or country to engage in commercial sex at one of her brothels located in greater Boston and eastern Virginia. The women were persuaded to work for this prostitution network

because the business maintained a regular customer base of men that were adequately screened, ensuring that the customers were not members of law enforcement or men who posed a risk to the safety and security of the commercial sex workers.

16. The vetting process frequently included having the men confirm their identities by sending photographs of themselves and either a photograph of their work or government-issued identification card. Once the sex customers were verified, they communicated with the brothel phones, which were typically held by HAN or JUNMYUNG, by booking appointments after receiving texts of a “menu” of available women (which aligned with the women posted on the brothel websites), sexual services, and hourly rate. After appointments were confirmed, the men were provided directions to the brothel and specific instructions about how to enter the apartment building and where to go once inside.

17. When customers arrived at the apartment, they did not knock; the door was opened by the woman with whom the customers scheduled their appointment, which was typically a female, who was expecting them. The customers provided a cash payment, in an amount confirmed in an earlier text message with the brothel phone. The customers removed their shoes, were escorted by a female to the bedroom where the customers undressed and were accompanied into an attached bathroom. There, they were offered a shower with or without the female and afterwards, they returned to the bedroom to engage in sex with that female using a condom that she provided. Most of the men showered again with the female when their appointments ended before they left the apartment.

18. The women were notified over a Korean messaging application about the schedule for the day, which included the time, the customer (listed by first name, race, and year of birth), the service, the price, and whether the customer was new or returning. If the customer

was “new,” the women were sent a photograph of the customer so that the women could confirm the customer’s identity upon arrival.

19. As the manager of the organization, HAN communicated with and recruited women to travel interstate to engage in commercial sex for cash in Boston and Eastern Virginia and maintained the websites and business records tied to the organization. The women generally had discussions with HAN to reach an agreement about working as sex workers before they travelled. In reaching this agreement, the women typically sent HAN photographs which were then used in the website advertisements. HAN enlisted both JAMES and JUNMYUNG to procure leases for apartments located in greater Boston and eastern Virginia where the commercial sex could occur. In the case of JAMES, in addition to using his own name as the single-tenant occupant of the apartments, he signed apartment leases in the names of his fraudulent identities as well and used fraudulent identification that at times contained the personal identifying information of the actual person.

20. HAN regularly visited and maintained the brothel apartments, both in Massachusetts and through her regular travels to Virginia. She assisted the women with their luggage and groceries, so the women were settled into the apartments; she coordinated rides, either through rideshares or other co-conspirators, for the women to and from the airport and between the various brothel locations so that they did not have to coordinate travel or pay for that added expense. HAN permitted the commercial sex workers to stay in the brothel apartments during their rotation in a given city so that they did not have to find lodging elsewhere, but established rules for their stays in the units to make sure they did not draw attention to the prostitution work. While most women paid for their own airline travel, at times HAN paid for their flights using her own credit card. Upon arrival in the brothel units, the women were

provided with condoms and lubricants that they could use and lingerie that they could wear when they engaged in prostitution.

21. HAN began working with JAMES at least no later than May 2021 at which time JAMES agreed to lease apartments in Massachusetts and Virginia in his name or his fraudulent identities. HAN paid JAMES's round trip travel for at least five trips from California and to the Boston or Virginia area in advance of the initial move-in dates for the apartments in order for JAMES to secure the brothel rentals by meeting with apartment managers and obtaining keys to the brothel units. In exchange for renting these apartments on behalf of the prostitution network, HAN paid JAMES approximately \$1,000 per month per active lease as a commission.

22. JAMES also provided an aspect of protection for the facilitators of the prostitution network. Because JAMES rented many brothel locations in his name or in his fraudulent identities, he made sure that the properties are not directly connected on the leases to the local prostitution managers, to the websites, or to the commercial sex workers. JAMES served as a liaison between the females working in the units and the property managers by fielding calls from the management companies and coordinating any issues that arose regarding maintenance and inspection.

23. As HAN's business expanded, she employed JUNMYUNG beginning in or about late 2021 and no later than early 2022, to work as the "booker" for her prostitution network. As the "booker," JUNMYUNG, at the direction of HAN, carried and maintained the brothel cell phones, communicated directly with and vetted the sex buyers, maintained appointment books to track the appointments made between the women and the customers, and booked appointments for customers with the women advertised on both the Virginia and Boston brothel websites.

24. JUNMYUNG, like HAN, also regularly assisted the commercial sex workers with

their groceries and luggage when they arrived at and left the Boston brothel locations, sometimes more than one location in a given day; and collected prostitution proceeds from the Boston brothel apartment units. JUNMYUNG placed at least one brothel lease in his name. In exchange for working as her appointment “booker,” HAN paid JUNMYUNG approximately \$6,000 to \$8,000 per month. The amount JUNMYUNG made varied based upon the total number of bookings that he made in a given month.

The Proceeds of the Prostitution Network

25. The women engaged in prostitution kept a percentage of the customer payments (a percentage determined by HAN). The remaining cash proceeds belonged to the organization. HAN typically directed the women to place their earnings in envelopes in the freezer or refrigerator in the brothel apartments and members of the organization, including HAN and JUNMYUNG, picked up the envelopes of cash proceeds from the brothels on a regular basis. HAN calculated the payments for the commercial sex workers based on the number of customers they met with, the length of appointment, and the type of appointment. These totals were documented on ledgers in HAN’s apartment, appointment books in JUNMYUNG’s apartment, and on the envelopes of cash proceeds.

26. HAN paid JUNMYUNG with these proceeds, typically in cash. HAN regularly made cash deposits, many of which were structured, into known U.S. bank accounts held in her name or in the name of others within her network. HAN disbursed this money in a variety of ways, including by engaging in various bank and peer-to-peer (“P2P”) transfers to accounts of others in her large network, including accounts in the name of JUNMYUNG, and those in the name of JAMES or his wife. HAN also transferred money to accounts that JAMES controlled in the names or business accounts of his fraudulent identities. Many of these business accounts of

JAMES and his known aliases did not appear to have transactions consistent with legitimate business expenses. HAN's credit card purchases reflected various business expenses, including approximately \$10,500 in airline costs and approximately \$15,000 in rideshare charges. She also transferred approximately \$90,000 to a bank account held in her name located at Kookmin Bank in South Korea. JAMES moved the funds around through various accounts, including through accounts held in the names of known aliases and business accounts associated with known aliases.

27. Likewise, the prostitution cash proceeds were used to structurally purchase money orders in increments less than \$3,000, in an apparent attempt to avoid Bank Secrecy ("BSA") record keeping and reporting requirements of Money Services Businesses ("MSBs"). These money orders were typically purchased by HAN at the United States Post Office ("USPO") in the form of United States Postal Service ("USPS") money orders or at Western Union locations. The money orders were used to pay various business expenses of the prostitution network and personal expenses of HAN's, including to pay rent and utilities at various brothel apartments, to pay co-conspirators and members of the network, to pay for the telephones and websites utilized to solicit and engage customers, and to pay rent and utilities for HAN's apartment.

28. During the time that he was employed by HAN, JUNMYUNG purchased a Corvette, at least a portion of which was funded by suspected prostitution proceeds. JUNMYUNG also made multiple cash deposits into U.S. bank accounts in increments less than \$10,000 where the total amount deposited on a given day exceeded \$10,000. HAN used prostitution proceeds to purchase luxury items, such as bags and shoes, and to purchase stored value cards as a method to conceal the actual source of the funds.

29. HAN, JAMES, JUNMYUNG, and their co-conspirators, known and unknown,

used the above, and additional, various methods in order to conceal and disguise the nature, location, source, ownership, and control of the prostitution network proceeds.

Objects and Purposes of the Prostitution Conspiracy

30. The object of the Prostitution Conspiracy was to persuade, induce, entice, and coerce women to travel to and between Massachusetts, Virginia, and elsewhere in interstate and foreign commerce to engage in prostitution in apartments leased by members of the conspiracy. The principal purpose of the Prostitution Conspiracy was to earn money from the prostitution of commercial sex workers advertised on the brothel websites and to conceal criminal activity from law enforcement.

Manner and Means of the Conspiracy

31. Among the manner and means by which (1) HAN LEE, a/k/a “Hana;” (2) JAMES LEE; and, (3) JUNMYUNG LEE and coconspirators known and unknown to the Grand Jury carried out the Prostitution Conspiracy were the following:

- a. Establishing the infrastructure necessary for the commercial sex workers to be enticed and persuaded to travel interstate to engage in prostitution on behalf of the prostitution network;
- b. Advertising appointments for commercial sex with women in greater Boston and eastern Virginia on the brothel websites, www.bostontopen10.com and www.browneyesgirlsva.blog, respectively;
- c. Updating the brothel websites frequently and describing new arriving women as “open” or “coming soon” to keep the demand, and therefore profits, high for the prostitution network;
- d. Providing free advertisement for the commercial sex workers posted on the brothel websites;
- e. Providing anonymity for the commercial sex workers by posting them on brothel websites with “stage names” and using local brothel phones to communicate with customers so that commercial sex workers do not have to arrange appointments themselves;

- f. Requiring a detailed verification process for first-time customers to include having first-time customers provide their names, email addresses, phone number, employer, reference, “selfies,” and government or employer issued identification;
- g. Maintaining a regular customer base of men that were adequately screened, ensuring that the customers were not members of law enforcement nor men who posed a risk to the safety and security of the commercial sex workers;
- h. Renting high-end apartments where the commercial sex could occur and misrepresenting the intended use of the apartment as “single tenant unit”;
- i. Renting high-end apartments in the names of fraudulent identities;
- j. Providing the sex customers with a private and comfortable location where they could engage in commercial sex for a fee with women advertised on the brothel website;
- k. Paying for round trip airline travel of co-conspirator in advance of initial move-in dates for the brothel apartments in order for the renter to meet with apartment managers and obtain keys to the brothel apartments;
- l. Fielding calls from the management companies and coordinating any issues regarding maintenance and inspection of the brothel apartments thereby serving as a liaison between the females working in the units and the property managers;
- m. Permitting the commercial sex workers to stay overnight in the brothel apartments during their tour in a given city so that the women did not have to find lodging elsewhere;
- n. Establishing house rules for the women during their stays in a given city to protect and maintain the secrecy of the business and ensure that the women did not draw attention to the prostitution work inside apartment buildings;
- o. Utilizing brothel phones to communicate with and vet customers prior to arranging appointments for commercial sex;
- p. Hiring a “booker” to carry and maintain the brothel cell phones and directly communicate with brothel customers;
- q. Booking appointments for the women to engage in commercial sex with properly vetted customers;
- r. Maintaining appointment books to track commercial sex appointments made

between the women and the customers;

- s. Maintaining ledgers and documenting earnings of commercial sex workers;
- t. Providing the commercial sex workers with a daily schedule of commercial sex appointments;
- u. Traveling to the various brothel locations in greater Boston and eastern Virginia to maintain the units, visit the women, and pick up prostitution proceeds;
- v. Assisting commercial sex workers with their luggage and groceries when they arrive at and depart from the brothel locations;
- w. Arranging transportation for the women to be transported to and from the airport and to and from the brothel locations in rideshares, private vehicles or taxis;
- x. Providing commercial sex workers with lingerie, condoms and lubricants to use when they engaged in commercial sex with the customers;
- y. Paying the commercial sex workers a substantial percentage of earnings, sometimes at a rate of approximately fifty (50) percent;
- z. Directing commercial sex workers to leave the remainder of the prostitution proceeds in the freezer or refrigerator of the brothel apartments;
- aa. Paying for airline travel, rideshare charges, brothel phones, brothel website fees, and other business expenses with prostitution proceeds; and
- bb. Paying for rent and utilities on brothel apartments with USPS and Western Union money orders purchased with prostitution proceeds.

Overt Acts in Furtherance of the Prostitution Conspiracy

32. Beginning on a date unknown to the Grand Jury but at least since from in or about July 2020 through in or about November 8, 2023, (1) HAN LEE, a/k/a “Hana;” (2) JAMES LEE; and, (3) JUNMYUNG LEE and coconspirators known and unknown to the Grand Jury committed and caused to be committed the following overt acts, among others, in furtherance of the Prostitution Conspiracy:

- a. On or about August 12, 2016, a co-conspirator purchased and registered the domain www.bostontopten10.com, which was a website that advertised women engaged in commercial sex in the greater Boston area;
- b. On or about May 25, 2021, JAMES traveled from Los Angeles, California to Boston, Massachusetts on a flight purchased by HAN with her Bank of America personal credit card;
- c. On or about May 26, 2021, the co-conspirators began an apartment lease in JAMES's name located at [REDACTED] Street, Unit [REDACTED] Cambridge, Massachusetts, which was used as a brothel for www.bostontopten10.com until at least June 2022;
- d. On or about May 26, 2021, a co-conspirator electronically signed a lease in JAMES's name for [REDACTED] Avenue, Unit [REDACTED] Fairfax, Virginia, an apartment that was used as a brothel for www.browneyesgirlsva.blog beginning on or about June 1, 2021 until November 8, 2023;
- e. On or about July 23, 2021, a co-conspirator purchased and registered the domain www.browneyesgirlsva.blog, which was a website that advertised women engaged in commercial sex in the eastern Virginia area;
- f. On or about November 18, 2021, HAN traveled roundtrip on the same day from Boston Logan Airport to Washington Dulles Airport to maintain the www.browneyesgirlsva.blog brothel location;
- g. On or about January 19, 2022, a co-conspirator submitted an application to lease an apartment located at [REDACTED] Street, Unit [REDACTED] Cambridge, Massachusetts with a lease start date of January 25, 2022 in the name of JAMES as the sole occupant of an apartment that was used as a brothel for www.bostontopten10.com until November 8, 2023;
- h. On or about June 6, 2022, JUNMYUNG submitted a rental application to lease an apartment that was located at [REDACTED] Street, Unit [REDACTED] Cambridge, Massachusetts and was used as a brothel for www.bostontopten10.com until November 8, 2023;
- i. On or about June 8, 2022, JUNMYUNG deposited \$35,700 in prostitution proceeds into a personal Bank of America checking account;
- j. On or about August 1, 2022, a co-conspirator electronically submitted a lease for an apartment located at [REDACTED] Street, Unit [REDACTED] Watertown, Massachusetts, under the JAMES fraudulent identity of L.K., which was an apartment used as a brothel for www.bostontopten10.com until November 8, 2023;
- k. On or about August 21, 2022, JAMES flew from California to Massachusetts

for the move-in date of August 22, 2022 for the brothel in the L.K. identity located at ██████████ Street, Unit ██████████ Watertown, Massachusetts;

- l. HAN paid with her Bank of America credit card for JAMES's round trip airline tickets from California to Massachusetts, in his name of JAMES, for the move-in date of August 22, 2022 for the brothel in the L.K. identity located at ██████████ Street, Unit ██████████, Watertown, Massachusetts;
- m. On or about January 3, 2023, HAN assisted a female, who was a suspected commercial sex worker, with her luggage as they both entered, and HAN quickly exited, a brothel located at ██████████ Street, Unit ██████████ Cambridge, Massachusetts with HAN locking the door behind her from the outside after leaving the unit;
- n. On or about January 17, 2023, JUNMYUNG visited the brothels located at ██████████ ██████████ Street, Units ██████████ and ██████████ in Cambridge, Massachusetts and assisted women believed to be engaged in commercial sex with their luggage as they left the building;
- o. On or about January 19, 2023, HAN was at the ██████████ Avenue, Unit ██████████ Fairfax, Virginia, to maintain an apartment that was used as a brothel for www.browneyesgirlsva.blog until November 8, 2023;
- p. On or about January 22, 2023, JUNMYUNG traveled with the Boston Brothel Phone to ██████████ Street in Cambridge, Massachusetts to escort a female, believed to be a commercial sex worker, inside the building. JUNMYUNG then traveled to and entered ██████████ Street in Watertown to maintain that brothel location;
- q. On or about January 27, 2023, JUNMYUNG used the Boston Brothel Phone to arrange an appointment for a sex customer to engage in commercial sex at a brothel located at ██████████ Street;
- r. On or about February 15, 2023, JUNMYUNG and HAN drove with an unidentified female, believed to be engaged in commercial sex, to the brothel located at ██████████ Street, Unit ██████████ in Watertown, Massachusetts and assisted the unidentified female with groceries and luggage as she entered and remained at the brothel apartment;
- s. On or about April 3, 2023, HAN entered into a lease for an apartment that was located at ██████████ Street, Unit ██████████ Cambridge, Massachusetts and was used as a brothel for www.bostontopten10.com until November 8, 2023;
- t. On or about April 11, 2023, HAN assisted two unidentified females with their luggage at ██████████ Street, one who left the brothel location that day and took a rideshare to Logan International Airport and the other believe to have arrived that day to bring her luggage into the unit;

- u. On or about May 26, 2023, a co-conspirator purchased nineteen (19) money orders, some USPS and others Western Union, totaling \$12,200 which were submitted for rent payments at four different brothel locations at USPO locations in Harvard Square, Porter Square and Central Square in Cambridge, Massachusetts and at Star Markets located in Boston and Cambridge, Massachusetts;
- v. In or around May 2023, the money orders that had been purchased on or about May 26, 2023 were applied to the June rent at various brothel locations, including [REDACTED] Street, Units [REDACTED] and [REDACTED] in Cambridge, Massachusetts and [REDACTED] Street, Unit [REDACTED] in Watertown, Massachusetts;
- w. On or about June 12, 2023, HAN retrieved prostitution proceeds from a brothel located at [REDACTED] Street in Cambridge and deposited the proceeds into a Bank of America account in the name of Y.K. She subsequently went to a USPO located at 125 Mt. Auburn Street in Cambridge where she exchanged prostitution proceeds for at least one USPS money order;
- x. On or about July 19, 2023 and on or about July 23, 2023, a co-conspirator made payments from a TD Bank account held in the name of Y.K. for the renewal of the www.browneyesgirlsva.blog website;
- y. On or about August 30, 2023, HAN purchased Western Union money orders with prostitution proceeds at a Star Market. These money orders were determined to have been subsequently used to pay the rent at HAN's residence located at [REDACTED];
- z. On or about August 31, 2023, on a phone call with the management company of [REDACTED] Avenue, Unit [REDACTED], JAMES, the sole legal tenant, stated that his "daughter" was staying at the apartment, which was then used as a brothel location for www.browneyesgirlsva.blog, in order to shield the commercial sex workers and the managers of the prostitution network from the rental company;
- aa. On or about September 23, 2023, a co-conspirator, in the fraudulent identity of JAMES of J.G.W., electronically signed a lease for an apartment located at [REDACTED] Drive, Unit [REDACTED], Tysons, Virginia which was used as a brothel for www.browneyesgirlsva.blog until November 8, 2023;
- bb. On or about October 2, 2023, JAMES flew from Los Angeles International Airport to Washington Dulles International Airport for the start of the lease of the brothel located at [REDACTED] Drive, Unit [REDACTED], Tysons, Virginia;
- cc. On or about October 2, 2023, HAN traveled from Logan International Airport in Boston, Massachusetts to Washington Dulles International Airport for the start of the lease of the brothel located at [REDACTED] Drive, Unit [REDACTED], Tysons, Virginia;

- dd. On or about October 2, 2023, a co-conspirator made purchases on HAN's credit card in Virginia at locations like Walmart, Home Goods, Mattress Firm, Home Depot and TJ Maxx to furnish the newest Virginia brothel;
- ee. On or about October 26, 2023, HAN used the Virginia Brothel Phone to arrange an appointment scheduled for October 26, 2023 for a customer to engage in commercial sex for a fee at one of the Virginia brothel locations with one of the women then posted on the www.browneyesgirlsva.blog website;
- ff. On or about October 27, 2023, HAN used the Virginia Brothel Phone to arrange an appointment scheduled for the same day for a customer to engage in commercial sex for a fee at one of the Virginia brothel locations with one of the women then posted on the www.browneyesgirlsva.blog website;
- gg. On dates between on or about October 22, 2023 and November 8, 2023, HAN collected from one of the Boston brothel locations an envelope with a ledger tracking the daily earnings of and containing prostitution proceeds earned by "Celine," who was then advertised on www.bostontopten10.com;
- hh. On various consecutive dates leading up to November 8, 2023, a co-conspirator messaged Females A through D on a Korean messaging application in a group chat named "BTT" with the daily schedule of times and names of customers scheduled for prostitution appointments;
- ii. On or about November 8, 2023, JUNMYUNG possessed the Boston Brothel Phone used to communicate with and set up appointments for customers interested in purchasing commercial sex with women posted on the www.bostontopten10.com website;
- jj. On or about November 8, 2023, HAN possessed the Virginia Brothel Phone used to communicate with and set up appointments for customers interested in purchasing commercial sex with women posted on the www.browneyesgirlsva.blog website; and
- kk. On a date prior to November 8, 2023, HAN communicated over a Korean messaging application with Female A to recruit her from another state to engage in commercial sex for a fee for the Boston brothel locations. Female A was then advertised on www.bostontopten10.com.

COUNT ONE

Conspiracy to Commit Persuade, Induce, Entice, and Coerce One or More Individuals to
Travel in Interstate or Foreign Commerce to Engage in Prostitution
(18 U.S.C. § 371)

The Grand Jury charges:

33. The Grand Jury re-alleges and incorporates by reference paragraphs 1-32 of this
Indictment.

34. Beginning on a date unknown but at least since July 2020 through in or about
November 8, 2023, in the District of Massachusetts, the Eastern District of Virginia, the Central
District of California, and elsewhere, the defendants,

- (1) HAN LEE, a/k/a “Hana,”
- (2) JAMES LEE, and
- (3) JUNMYUNG LEE,

conspired with each other and with others known and unknown to the Grand Jury to commit an
offense against the United States, to wit, to knowingly persuade, induce, entice, and coerce
individuals to travel in interstate and foreign commerce, to engage in prostitution, and in any
sexual activity for which a person can be charged with a criminal offense, in violation of 18
U.S.C. § 2422(a).

COUNT TWO
Money Laundering Conspiracy
(18 U.S.C. § 1956(h))

The Grand Jury further charges:

35. Beginning on a date unknown but at least since July 2020 through in or about November 8, 2023, in the District of Massachusetts, the Eastern District of Virginia, the Central District of California, and elsewhere, the defendants,

- (1) HAN LEE, a/k/a “Hana,”
- (2) JAMES LEE, and
- (3) JUNMYUNG LEE,

conspired with each other and with others known and unknown to the Grand Jury to conduct and attempt to conduct financial transactions, knowing that the property involved in such transactions represented the proceeds of some form of unlawful activity, and which in fact involved the proceeds of specified unlawful activity, that is, persuading, inducing, enticing and coercing individuals to travel in interstate and foreign commerce to engage in prostitution and in any sexual activity for which a person can be charged with a criminal offense, in violation of 18 U.S.C. § 2422(a), and knowing that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

PROSTITUTION CONSPIRACY FORFEITURE ALLEGATION
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 371, set forth in Count One, the defendants,

- (1) HAN LEE, a/k/a “Hana”,
- (2) JAMES LEE, and
- (3) JUNMYUNG LEE,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, the following asset(s):

- a. 2018 Chevy Corvette Grand bearing the VIN number [REDACTED] seized from Junmyung Lee at [REDACTED] Dedham, Massachusetts 02026 on or about November 8, 2023.
- b. \$22,608 in United States currency seized from Han Lee at [REDACTED] Drive, Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;
- c. \$6,835 in United States currency seized at [REDACTED] Street, Unit [REDACTED], Cambridge, Massachusetts 02138 on or about November 8, 2023;
- d. \$2,150 in United States currency seized at [REDACTED] Street, Unit [REDACTED] Watertown, Massachusetts 02472 on or about November 8, 2023;
- e. \$1,650 in United States currency seized at [REDACTED] Drive, Unit [REDACTED] Tysons, Virginia, 22102 on or about November 8, 2023;
- f. \$1,000 in United States currency seized at [REDACTED] Avenue, Unit [REDACTED], Fairfax, Virginia, 22031 on or about November 8, 2023;
- g. \$6,500 in United States currency seized from James Lee at [REDACTED] Drive, Torrance, California, 90502 on or about November 8, 2023;
- h. \$5,000 in United States currency seized from James Lee at [REDACTED]

Drive, Torrance, California, 90502 on or about on or about November 8, 2023;

- i. \$5,000 in United States currency seized from Junmyung Lee at [REDACTED] Blvd., Unit [REDACTED], Dedham, Massachusetts, 02026 on or about November 8, 2023;
- j. \$210 in United States currency seized from Junmyung Lee at [REDACTED] Blvd., Unit [REDACTED], Dedham, Massachusetts, 02026 on or about November 8, 2023;
- k. \$5,567.89 seized from Bank of America checking account ending *7708 held in the name of Han A Lee on or about November 8, 2023;
- l. \$75.92 seized from Bank of America checking account ending in *3444 held in the name of Han A Lee on or about November 8, 2023;
- m. \$2,942.02 seized from Bank of America checking account ending in *1170 held in the name of Y.K. seized on or about November 8, 2023;
- n. \$516.37 seized from Bank of America savings account ending in *1183 held in the name of Y.K. seized on or about November 8, 2023;
- o. \$2,844.01 seized from Bank of America checking account ending in *5662 held in the name of Junmyung Lee seized on or about November 8, 2023;
- p. \$3,689.92 seized from Hanmi Bank checking account ending in *7665 held in the name of James Y. Lee seized on or about November 8, 2023;
- q. \$1,787.32 seized from Hanmi Bank savings account ending in *4307 held in the name of V.L. seized on or about November 8, 2023;
- r. \$1,000 United States Postal Service money order with a serial number ending in *2856 seized from Han Lee at [REDACTED] Drive, Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;
- s. \$1,000 United States Postal Service money order with a serial number ending in *2867 seized from Han Lee at [REDACTED] Drive, Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;
- t. \$500 Western Union money order with a serial number ending in *0154 seized from Han Lee at [REDACTED] Drive, Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;
- u. \$500 Western Union money order with a serial number ending in *0155

seized from Han Lee at [REDACTED] Drive, Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;

- v. \$500 Western Union money order with a serial number ending in *0156 seized from Han Lee at [REDACTED] Drive, Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;
- w. \$500 Western Union money order with a serial number ending in *0157 seized from Han Lee at [REDACTED] Drive, Unit [REDACTED] Cambridge, Massachusetts 02140 on or about November 8, 2023; and,
- x. Assorted stored value cards seized from Han Lee at [REDACTED] Drive, Unit [REDACTED] Cambridge, Massachusetts 02140 on or about November 8, 2023.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

MONEY LAUNDERING FORFEITURE ALLEGATION
(18 U.S.C. § 982(a)(1))

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 1956(h), set forth in Count Two, the defendants,

- (1) HAN LEE, a/k/a “Hana”,
- (2) JAMES LEE, and
- (3) JUNMYUNG LEE,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

- a. The domain name [https://bostontopten10\[.\]com](https://bostontopten10[.]com) seized on November 8, 2023;
- b. The domain name [https://browneyesgirlsva\[.\]blog](https://browneyesgirlsva[.]blog) seized on November 8, 2023;
- c. 2018 Chevy Corvette Grand bearing the VIN number [REDACTED] seized from Junmyung Lee at [REDACTED] Dedham, Massachusetts 02026 on or about November 8, 2023;
- d. \$22,608 in United States currency seized from Han Lee at [REDACTED] Drive, Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;
- e. \$6,835 in United States currency seized at [REDACTED] Street, Apt. [REDACTED] Cambridge, Massachusetts 02138 on or about November 8, 2023;
- f. \$2,150 in United States currency seized at [REDACTED] Street, Unit [REDACTED] Watertown, Massachusetts 02472 on or about November 8, 2023;
- g. \$1,650 in United States currency seized at [REDACTED] Drive, Unit [REDACTED] Tysons, Virginia, 22102 on or about November 8, 2023;
- h. \$1,000 in United States currency seized at [REDACTED] Avenue, Unit [REDACTED] Fairfax, Virginia, 22031 on or about November 8, 2023;
- i. \$6,500 in United States currency seized from James Lee at [REDACTED]

Drive, Torrance, California, 90502 on or about November 8, 2023;

- j. \$5,000 in United States currency seized from James Lee at [REDACTED] Drive, Torrance, California 90502 on or about on or about November 8, 2023;
- k. \$5,000 in United States currency seized from Junmyung Lee at [REDACTED] Blvd., Unit [REDACTED] Dedham, Massachusetts 02026 on or about November 8, 2023;
- l. \$210 in United States currency seized from Junmyung Lee at [REDACTED] Blvd., Unit [REDACTED] Dedham, Massachusetts 02026 on or about November 8, 2023;
- m. \$5,567.89 seized from Bank of America checking account ending *7708 held in the name of Han A Lee on or about November 8, 2023;
- n. \$75.92 seized from Bank of America checking account ending in *3444 held in the name of Han A Lee on or about November 8, 2023;
- o. \$2,942.02 seized from Bank of America checking account ending in *1170 held in the name of Y.K. seized on or about November 8, 2023;
- p. \$516.37 seized from Bank of America savings account ending in *1183 held in the name of Y.K. seized on or about November 8, 2023;
- q. \$2,844.01 seized from Bank of America checking account ending in *5662 held in the name of Junmyung Lee seized on or about November 8, 2023;
- r. \$3,689.92 seized from Hanmi Bank checking account ending in *7665 held in the name of James Y. Lee seized on or about November 8, 2023;
- s. \$1,787.32 seized from Hanmi Bank savings account ending in *4307 held in the name of V.L. seized on or about November 8, 2023;
- t. \$1,000 U.S. Postal Service money order with a serial number ending in *2856 seized from Han Lee at [REDACTED] Drive, Unit [REDACTED], Cambridge, Massachusetts, 02140 on or about November 8, 2023;
- u. \$1,000 U.S. Postal Service money order with a serial number ending in *2867 seized from Han Lee at [REDACTED] Drive, Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;
- v. \$500 Western Union money order with a serial number ending in *0154 seized from Han Lee at [REDACTED] Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;

- w. \$500 Western Union money order with a serial number ending in *0155 seized from Han Lee at [REDACTED] Drive, Unit [REDACTED] Cambridge, Massachusetts 02140 on or about November 8, 2023;
- x. \$500 Western Union money order with a serial number ending in *0156 seized from Han Lee at [REDACTED] Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;
- y. \$500 Western Union money order with a serial number ending in *0157 seized from Han Lee at [REDACTED] Unit [REDACTED] Cambridge, Massachusetts 02140 on or about November 8, 2023;
- z. Assorted stored value cards seized from Han Lee at [REDACTED], Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;
- aa. Three (3) Black Samsung mobile phones seized from Junmyung Lee at [REDACTED] Blvd., Unit [REDACTED], Dedham, Massachusetts 02026 on or about November 8, 2023;
- bb. Silver iPhone seized from Junmyung Lee at [REDACTED] Blvd., Unit [REDACTED] Dedham, Massachusetts 02026 on or about November 8, 2023;
- cc. Black Mobile flip phone seized from Junmyung Lee at [REDACTED] Blvd., Unit [REDACTED], Dedham, Massachusetts 02026 on or about November 8, 2023;
- dd. Alienware Desktop computer seized from Junmyung Lee at [REDACTED] Blvd., Apt. [REDACTED], Dedham, Massachusetts 02026 on or about November 8, 2023;
- ee. Macbook laptop computer seized from Junmyung Lee at [REDACTED] Blvd., Apt. [REDACTED], Dedham, Massachusetts 02026 on or about November 8, 2023;
- ff. Black Samsung mobile phone SM-A205u seized from Junmyung Lee at [REDACTED] Blvd., Unit [REDACTED] Dedham, Massachusetts 02026 on or about November 8, 2023;
- gg. Three (3) SIM cards seized from Junmyung Lee at [REDACTED] Blvd., Unit [REDACTED] Dedham, Massachusetts 02026 on or about November 8, 2023;
- hh. iPad with keyboard seized at [REDACTED] Street, Unit [REDACTED], Watertown, Massachusetts 02472 on or about November 8, 2023;
- ii. Purple iPhone seized at [REDACTED] Street, Unit [REDACTED], Watertown, Massachusetts 02472 on or about November 8, 2023;

- jj. Netgear router seized at [REDACTED] Street, Unit [REDACTED], Watertown, Massachusetts 02472 on or about November 8, 2023;
- kk. Red Apple iPhone seized at [REDACTED] Street, Unit [REDACTED], Cambridge, Massachusetts 02138 on or about November 8, 2023;
- ll. Grey iPad with black case seized from Han Lee at [REDACTED] Drive, Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;
- mm. Black Apple iPhone seized from Han Lee at [REDACTED] Drive, Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;
- nn. Black Apple iPhone with cracked screen seized from Han Lee at [REDACTED] Drive, Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;
- oo. Samsung cell phone with white case seized from Han Lee at [REDACTED] Drive, Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;
- pp. Eight (8) cell phones in plastic organizer seized from Han Lee at [REDACTED] Drive, Unit [REDACTED] Cambridge, Massachusetts 02140 on or about November 8, 2023;
- qq. Silver Macbook laptop with black case seized from Han Lee at [REDACTED] Drive, Unit [REDACTED] Cambridge, Massachusetts 02140 on or about November 8, 2023;
- rr. Silver Macbook laptop seized from Han Lee at [REDACTED] Drive, Unit [REDACTED] Cambridge, Massachusetts 02140 on or about November 8, 2023;
- ss. Light Blue Samsung cell phone seized from Han Lee at [REDACTED] Drive, Unit [REDACTED], Cambridge, Massachusetts 02140 on or about November 8, 2023;
- tt. Three (3) cell phones on desk counter seized from Han Lee at [REDACTED] Drive, Unit [REDACTED] Cambridge, Massachusetts 02140 on or about November 8, 2023;
- uu. Two (2) cell phones on kitchen counter seized from Han Lee at [REDACTED] Drive, Unit [REDACTED] Cambridge, Massachusetts 02140 on or about November 8, 2023;
- vv. Three (3) SIM cards seized from Han Lee at [REDACTED] Drive, Unit [REDACTED] Cambridge, Massachusetts 02140 on or about November 8, 2023;

ww. Four (4) thumb drives seized from Han Lee at [REDACTED] Drive, Unit [REDACTED] Cambridge, Massachusetts 02140 on or about November 8, 2023;

xx. Cell phone seized from James Lee upstairs at [REDACTED] Drive Torrance, California 90502 on or about November 8, 2023; and

yy. Cell phone seized from James Lee downstairs at [REDACTED] Drive Torrance, California 90502 on or about November 8, 2023.

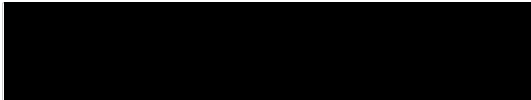
2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), as a result of any act or omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

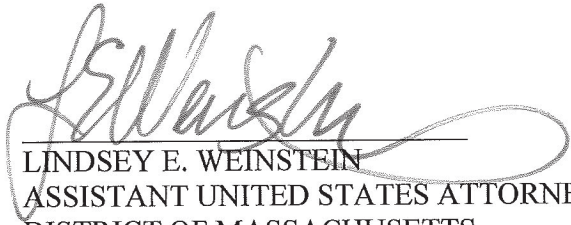
it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 982(a)(1).

A TRUE BILL



FORÉPERSON


LINDSEY E. WEINSTEIN
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: FEBRUARY 1, 2024
Returned into the District Court by the Grand Jurors and filed.

/s/ Leonardo T. Vieira 3:05pm
DEPUTY CLERK

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency _____ HSI _____

City Cambridge, Watertown, and Virginia

Related Case Information:

County Middlesex and elsewhere

Superseding Ind./ Inf. _____ Case No. _____

Same Defendant New Defendant _____

Magistrate Judge Case Number 23-mj-4605-DHH

Search Warrant Case Number See additional information

R 20/R 40 from District of _____

Defendant Information:

Is this case related to an existing criminal action pursuant to Rule 40.1(h)? If yes, case number _____ Yes No

Defendant Name Han A. Lee

Juvenile: Yes No

Is this person an attorney and/or a member of any state/federal bar: Yes No

Alias Name: Hana Lee

Address: [REDACTED] Cambridge MA

Birth date (Yr only): 1982 SSN (last 4#): 6130 Sex: F Race Asian Nationality: Korean

Defense Counsel if known: Scott Lauer Address: Federal Defenders Office

Bar Number: _____

U.S. Attorney Information

AUSA: Lindsey Weinstein Bar Number if applicable: 676933

Interpreter: Yes No List language and/or dialect: Korean

Victims: Yes No If yes, are there multiple crime victims under 18 USC§3771(d)(2) Yes No

Matter to be SEALED: Yes No

Warrant Requested Regular Process In Custody

Location Status: Wyatt

Arrest Date: 11/8/2023

Already in Federal Custody as of 11/8/2023 in Wyatt

Already in State Custody at _____ Serving Sentence Awaiting Trial

On Pretrial Release: Ordered by: _____ on _____

Charging Document: Complaint Information Indictment

Total # of Counts: Petty _____ Misdemeanor _____ Felony 2

Continue on Page 2 for Entry of U.S.C. Citations

I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: 2/1/2024

Signature of AUSA: [Signature]

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Han A. Lee

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. §371</u>	<u>Conspiracy to persuade, induce, entice, coerce individuals to travel in interstate commerce to engage in prostitution</u>	<u>1</u>
Set 2	<u>18 U.S.C. § 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>2</u>
Set 3	<u>18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)</u>	<u>Conspiracy Forfeiture Allegations</u>	_____
Set 4	<u>18 U.S.C. § 982(a)(1)</u>	<u>money laundering forfeiture allegations</u>	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

23-4103-DHH, 23-4327-DHH, 23-4328-DHH, 23-4329-DHH, 23-4330-DHH, 23-4331-DHH, 23-4332-DHH, 23-4333-DHH, 23-4334-DHH, 23-4335-DHH, 23-4336-DHH, 23-4589-DHH, 23-4590-DHH, 23-4591-DHH, 23-4592-DHH, 23-4593-DHH, 23-4594-DHH, 23-4595-DHH, 23-4596-DHH, 23-4597-DHH, 23-4598-DHH, 23-4599-DHH, 23-4600-DHH, 23-4606-DHH, 23-4607-DHH, 23-4608-DHH, 23-4609-DHH, 23-4610-DHH, 23-4611-DHH

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency _____ HSI _____

City Cambridge, Watertown, and Virginia

Related Case Information:

County Middlesex and elsewhere

Superseding Ind./ Inf. _____ Case No. _____
Same Defendant New Defendant _____
Magistrate Judge Case Number 23-mj-4605-DHH
Search Warrant Case Number See additional information
R 20/R 40 from District of _____

Defendant Information:

Is this case related to an existing criminal action pursuant to Rule 40.1(h)? If yes, case number _____ Yes No

Defendant Name James Lee

Juvenile: Yes No

Is this person an attorney and/or a member of any state/federal bar: Yes No

Alias Name: _____

Address: [Redacted] Torrance, CA

Birth date (Yr only): 1955 SSN (last 4#): 2405 Sex: M Race Asian Nationality: Korean

Defense Counsel if known: Keith Halpern Address: _____

Bar Number: _____

U.S. Attorney Information

AUSA: Lindsey Weinstein Bar Number if applicable: 676933

Interpreter: Yes No List language and/or dialect: Korean

Victims: Yes No If yes, are there multiple crime victims under 18 USC§3771(d)(2) Yes No

Matter to be SEALED: Yes No

Warrant Requested Regular Process In Custody

Location Status: Wyatt

Arrest Date: 11/8/2023

Already in Federal Custody as of 11/8/2023 in Wyatt

Already in State Custody at _____ Serving Sentence Awaiting Trial

On Pretrial Release: Ordered by: _____ on _____

Charging Document: Complaint Information Indictment

Total # of Counts: Petty _____ Misdemeanor _____ Felony 2

Continue on Page 2 for Entry of U.S.C. Citations

I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: 2/1/2024

Signature of AUSA: [Signature]

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant James Lee

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. §371</u>	<u>Conspiracy to persuade, induce, entice, coerce individuals to travel in interstate commerce to engage in prostitution</u>	<u>1</u>
Set 2	<u>18 U.S.C. § 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>2</u>
Set 3	<u>18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)</u>	<u>Conspiracy Forfeiture Allegations</u>	_____
Set 4	<u>18 U.S.C. § 982(a)(1)</u>	<u>money laundering forfeiture allegations</u>	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

23-4103-DHH, 23-4327-DHH, 23-4328-DHH, 23-4329-DHH, 23-4330-DHH, 23-4331-DHH, 23-4332-DHH, 23-4333-DHH, 23-4334-DHH, 23-4335-DHH, 23-4336-DHH, 23-4589-DHH, 23-4590-DHH, 23-4591-DHH, 23-4592-DHH, 23-4593-DHH, 23-4594-DHH, 23-4595-DHH, 23-4596-DHH, 23-4597-DHH, 23-4598-DHH, 23-4599-DHH, 23-4600-DHH, 23-4606-DHH, 23-4607-DHH, 23-4608-DHH, 23-4609-DHH, 23-4610-DHH, 23-4611-DHH

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency _____ HSI _____

City Cambridge, Watertown, and Virginia

Related Case Information:

County Middlesex and elsewhere

Superseding Ind./ Inf. _____ Case No. _____
Same Defendant New Defendant _____
Magistrate Judge Case Number 23-mj-4605-DHH
Search Warrant Case Number See additional information
R 20/R 40 from District of _____

Defendant Information:

Is this case related to an existing criminal action pursuant to Rule 40.1(h)? If yes, case number _____ Yes No

Defendant Name Junmyung Lee

Juvenile: Yes No

Is this person an attorney and/or a member of any state/federal bar: Yes No

Alias Name: _____

Address: [Redacted] Dedham, MA

Birth date (Yr only): 1993 SSN (last 4#): 6942 Sex: M Race Asian Nationality: Korean

Defense Counsel if known: John Amabile Address: _____

Bar Number: _____

U.S. Attorney Information

AUSA: Lindsey Weinstein Bar Number if applicable: 676933

Interpreter: Yes No List language and/or dialect: Korean

Victims: Yes No If yes, are there multiple crime victims under 18 USC§3771(d)(2) Yes No

Matter to be SEALED: Yes No

Warrant Requested Regular Process In Custody

Location Status: Wyatt

Arrest Date: 11/8/2023

Already in Federal Custody as of 11/8/2023 in Wyatt

Already in State Custody at _____ Serving Sentence Awaiting Trial

On Pretrial Release: Ordered by: _____ on _____

Charging Document: Complaint Information Indictment

Total # of Counts: Petty _____ Misdemeanor _____ Felony 2

Continue on Page 2 for Entry of U.S.C. Citations

I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: 2/1/2024

Signature of AUSA: [Signature]

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant Junmyung Lee

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. §371</u>	<u>Conspiracy to persuade, induce, entice, coerce individuals to travel in interstate commerce to engage in prostitution</u>	<u>1</u>
Set 2	<u>18 U.S.C. § 1956(h)</u>	<u>Money Laundering Conspiracy</u>	<u>2</u>
Set 3	<u>18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)</u>	<u>Conspiracy Forfeiture Allegations</u>	_____
Set 4	<u>18 U.S.C. § 982(a)(1)</u>	<u>money laundering forfeiture allegations</u>	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION:

23-4103-DHH, 23-4327-DHH, 23-4328-DHH, 23-4329-DHH, 23-4330-DHH, 23-4331-DHH, 23-4332-DHH, 23-4333-DHH, 23-4334-DHH, 23-4335-DHH, 23-4336-DHH, 23-4589-DHH, 23-4590-DHH, 23-4591-DHH, 23-4592-DHH, 23-4593-DHH, 23-4594-DHH, 23-4595-DHH, 23-4596-DHH, 23-4597-DHH, 23-4598-DHH, 23-4599-DHH, 23-4600-DHH, 23-4606-DHH, 23-4607-DHH, 23-4608-DHH, 23-4609-DHH, 23-4610-DHH, 23-4611-DHH