

Government Exhibit A

AFFIDAVIT

I, John W. Canning, after being first duly sworn, depose and say:

Introduction

1. Your affiant is a Special Agent with the Federal Bureau of Investigation (“FBI”) and has been so employed for approximately twelve years. Prior to employment with the FBI, your affiant was an Investigator with the Escambia County Sheriff’s Office for approximately six years as well as a Special Agent with the Drug Enforcement Administration.

2. As a Special Agent, your affiant has participated in the investigation of persons suspected of various violations of Title 18 of the United States Code; to include wire fraud, money laundering, bank fraud and various other white collar federal criminal violations, as well as various cyber/child pornography and human/sex trafficking laws.

3. This affidavit is being submitted in support of a criminal complaint and arrest warrant for **David Clayton Williams** (SSN [REDACTED]). Your affiant submits there is probable cause to believe that **Williams** is in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) – harboring illegal aliens for the purpose of commercial advantage or private financial gain and Title 18, United States Code, Sections 1952(a)(3) and 1956(h) – the interstate travel/use of a facility in aid of racketeering and conspiracy to commit money laundering.

4. This affidavit is also being submitted in support of applications for search warrants to search **Williams’s** massage parlors located at:

A-1. **704 Massachusetts Avenue, Pensacola, Florida 32505**

A-2. **7055 Fairfield Drive, Pensacola, Florida 32505**

A-3. **127 N New Warrington Road, Pensacola, Florida 32506**

A-4. **126 Shell Avenue SE, Fort Walton Beach, Florida 32548** and

A-5. **3268 Fordham Parkway, Gulf Breeze, Florida 32563**

The above locations are more particularly described in Attachments A-1 through A-5, which are incorporated herein. Your affiant submits there is probable cause to believe that fruits and evidence of violations of Title 8, United States Code, Section 1324(a)(1)(A)(iii) and Title 18, United States Code, Sections 1952(a)(3) and 1956(h), exists at the locations to be searched.

5. The statements contained in this affidavit are based on your affiant's knowledge and experience, information provided to your affiant by Internal Revenue Service - Criminal Investigation Division (IRS-CI) [REDACTED], Homeland Security Investigations [REDACTED], and other agents and officers from federal, state, and local law enforcement agencies, your affiant's review of records, and information provided by cooperating witnesses. This affidavit does not set forth every fact known regarding the investigation; rather, it sets forth only facts sufficient to establish probable cause.

Initial Investigation

6. In July 2017, the FBI received two anonymous tips through the National Human Trafficking Hotline (NHTH). The NHTH tips [REDACTED] indicated the massage parlors located at **7055 Fairfield Drive, Pensacola, Florida**, and 1800 Beck Avenue, Panama City, Florida, were possibly using under-aged females and offering sexual acts for additional money during the massage sessions.

7. During an initial investigation by the FBI and the Panama City Police Department, the use of a Confidential Informant (CI) confirmed sexual acts being offered in exchange for money at 1800 Beck Avenue, Panama City, Florida. More specifically, the Panama City Police Department sent a CI to purchase a massage at 1800 Beck Avenue. Upon walking into the

business and requesting a massage, the CI was taken to a room. Shortly after the massage started, the CI was offered sexual acts for additional money by an Asian female. The CI refused any sexual acts, at which time the Asian female providing the massage continued for only a brief time and then informed the CI the massage was complete. The CI then left the business without any further interaction with the female.

8. Further investigation revealed that on or about March 6, 2017, **Williams** purchased 1800 Beck Avenue, Panama City, Florida, for \$135,000 with a \$50,000 down payment, as per Bay County Clerk of Court records. On or about March 14, 2017, **Williams** filed Articles of Organization for a Limited Liability Company for "1800 Beck Massage LLC" with the State of Florida, Secretary of State, Division of Corporations, listing himself as a Registered Agent. **Williams** also listed himself and [REDACTED] as "Authorized Managers" of the Limited Liability Company.¹

7055 Fairfield Massage, LLC – 7055 Fairfield Drive Location

9. During the instant investigation, your affiant learned about multiple past contacts **Williams** had at **7055 Fairfield Massage, LLC**, with local law enforcement. More specifically:

- a. On or about October 31, 2017, the Escambia County Sheriff's Office (ECSO) responded to **7055 Fairfield Drive, Pensacola, Florida**, due to a complaint about possible prostitution at the business. **Williams** identified himself as a co-owner of the business with [REDACTED]. **Williams** acknowledged he was going through [REDACTED]. **Williams** stated most of the females working at the

¹ [REDACTED]

massage business were operating without a license. While ECSO was present, **Williams** removed a 2011 Spree Ultra-Light camper, which was owned and registered to **Williams**, located behind the business (one of the NHTH tips previously received by the FBI indicated Asian females were living in an RV behind this business location).

- b. On or about December 27, 2017, the ECSO responded to **7055 Fairfield Drive, Pensacola, Florida**, in reference to a suspicious person complaint. Upon the ECSO arrival, **Williams** advised a deputy there had been several reports of prostitution occurring at the business and unlicensed therapists working there as well. **Williams** asked the deputy to accompany him inside the business in order to contact the three Asian female workers. While on scene, the ECSO deputy checked the identification and license information of all three females present in the business. The following is a list of the females present:

- i. [REDACTED], produced a State of New York identification card bearing number [REDACTED], as well as US Employment Card [REDACTED] and Florida Massage Therapist license [REDACTED], which expired on 08/31/2017. [REDACTED] told the deputy she was an employee of the business.
- ii. [REDACTED], produced a State of California identification card bearing number [REDACTED], as well as US Employment Card [REDACTED] and Florida Massage Therapist license [REDACTED] (non-practicing license). [REDACTED] told the deputy she was an employee of the business.

iii. [REDACTED], could not produce any identification upon the deputy's request. A short while later, an unidentified person, who was referred to as a "friend," brought [REDACTED] her identification documents. [REDACTED] produced Chinese Passport [REDACTED] and US Employment Card [REDACTED], which expired on 07/24/17. [REDACTED] also produced Florida Massage Therapist license [REDACTED]. [REDACTED] told the deputy she was an employee of the business.

10. Queries conducted by the Department of Homeland Security revealed the following prior information as it related to each of the Asian females:

A: [REDACTED]: Encountered and subsequently arrested by immigration officials in Utah at a massage parlor that was under investigation for providing sex acts to customers.

B: [REDACTED]: Immigration databases reflect that [REDACTED] is not eligible to remain in the United States and is subject to deportation; removability charges exist based on [REDACTED] overstaying the terms of her visa, which expired on or about January 13, 2009.

C: [REDACTED] applied for a visa in 2015 and was granted a visa and status to remain in the United States until 2025.

Other Locations

11. During the course of the investigation, your affiant discovered a parallel investigation was being conducted by the FBI Pittsburgh (PG) Division. Through collaboration with FBI PG Division, your affiant learned that [REDACTED] was listed as an organizer and/or associated with multiple massage parlors in Pennsylvania according to the State of Pennsylvania, Bureau of Corporations.

12. Additionally, in 2016, as part of a routine prostitution suppression detail, an FBI PG Division, Task Force Office (TFO) made a local arrest for prostitution out of the Thai Massage parlor, 39 West Main Street, Carnegie, Pennsylvania, after he was offered a sexual act in exchange for money. The location was associated with [REDACTED] and **Williams** via records/images obtained pursuant to a federal search that was executed on the Google account of **Williams**, which is discussed in more detail below in paragraphs 32 - 39.

13. During the execution of the arrest, none of the Asian females at the business possessed any physical identification on their person, but rather produced pictures of identification on their respective cell phones. All of the Asian females were living in the rooms at the business in which they performed massages. Luggage and large amounts of United States currency were located in the closets of the rooms.

14. As the investigation continued, your affiant learned that since his separation/divorce from [REDACTED], **Williams** has been opening new Asian massage parlors across the State of Florida and elsewhere. However, it appears that **Williams** has now been using nominees to conceal his ownership of the massage parlors and their corresponding bank accounts. The following massage parlor locations were found to be associated with **Williams** through law enforcement reporting, electronic federal search warrant results, and corporate and government records, amongst other things:

- a. **7055 Fairfield Drive, Pensacola, Florida**
- b. **704 Massachusetts Avenue, Pensacola, Florida**
- c. **127 N New Warrington Road, Pensacola, Florida**
- d. **3268 Fordham Parkway, Gulf Breeze, Florida**
- e. **126 Shell Avenue SE, Fort Walton Beach, Florida**

- f. 2106 Drew Street #104, Clearwater, Florida
- g. 10422 N Florida Avenue, Tampa, Florida
- h. 1800 Beck Avenue, Panama City, Florida
- i. 6240 Seminole Boulevard, Seminole, Florida
- j. 232 Bay Street, Daytona Beach, Florida
- k. 4689 N. Monroe Street, Tallahassee, Florida
- l. 6715 Wilson Boulevard, Jacksonville, Florida
- m. 3082 S 3rd Street, Jacksonville, Florida
- n. 1832 S. University Boulevard, Jacksonville, Florida
- o. 6817 Southpoint Parkway, Jacksonville, Florida
- p. 211 SW 4th Avenue, Suite #5, Gainesville, Florida
- q. 39 W. Main Street, Carnegie, Pennsylvania
- r. 1407 Peninsula Drive, Erie, Pennsylvania
- s. 1707 Hathaway Lane, Pittsburgh, Pennsylvania
- t. 639 Brown Avenue, Turtle Creek, Pennsylvania
- u. 30-32 Commercial Street, Braintree, Massachusetts
- v. 696 Warrenton Road, Fredericksburg, Virginia²

Division of Corporation Records

15. Florida Division of Corporations records showed Massage in Pensacola LLC was established on or about March 19, 2019. The records list the sole officer as [REDACTED] with an address of **704 Massachusetts Avenue, Pensacola, FL 32505**. The status of company is listed

² Your affiant anticipates that, simultaneous with the execution of the search warrants in the Northern District of Florida as applied for herein, other search warrants of [REDACTED] massage parlors will be executed in the Middle District of Florida, the Western District of Pennsylvania, and the Eastern District of Virginia.

as “active.” Florida Department of Corporations records also show [REDACTED] as the sole officer of Asian Massage Tampa LLC with an address of 10422 N Florida Avenue, Tampa, FL 33612, established on or about February 26, 2018. The status of the company is listed as “active.” Bank of America records show that an account ending in 2593 was opened in April 5, 2018. Immigration databases were queried and reflected that [REDACTED] is residing in the United States as a permanent resident.

16. Florida Department of Corporations records show that Asia Pro Walk in Massage LLC was established on or about October 10, 2017. The records list the sole officer as [REDACTED] with an address of **127 N New Warrington Road, Pensacola, FL 32506**. The status of the company is listed as “active.” Bank of America records show that an account ending in 0616 was opened in Pensacola, on or about October 12, 2017, by [REDACTED]. Homeland Security Investigations [REDACTED] confirmed that [REDACTED] is illegally present in the United States. The bank records also list Asia Pro Walk in Massage LLC’s address as **127 N New Warrington Road, Pensacola, FL 32506**.

17. Florida Department of Corporations records show that All Pro Walk in Massage LLC was established on or about September 22, 2017. The records list the sole officer as [REDACTED] with an address of **126 Shell Avenue SE, Fort Walton Beach, FL 32548**. The status of company is listed as “active.” Bank of America records show that an account ending in 8477 was opened in Fort Walton Beach, on or about October 2, 2017, by [REDACTED]. The bank records also list All Pro Walk in Massage LLC’s address as **126 Shell Avenue SE, Fort Walton Beach, FL 32548**.

18. Florida Department of Corporations records show that All Day Walk in Massage LLC was established on or about October 20, 2017. The records list the sole officer as [REDACTED]

██████ with an address of **3268 Fordham Parkway, Gulf Breeze, FL 32563**. On or about September 20, 2018, an amendment was filed removing ██████████ as an officer and replacing her with ██████████, however the address remains the same, **3268 Fordham Parkway, Gulf Breeze, FL 32563**. The status of company is listed as “active.” Wells Fargo Bank records show that an account ending 5386 was opened in Mary Esther, FL, on or about October 23, 2017, by ██████████. The bank records also list All Day Walk in Massage LLC’s address as **3268 Fordham Parkway, Gulf Breeze, FL 32563**.

Backpage.com Records

19. Based on your affiant’s training and experience, Backpage.com was an adult website prominently utilized to post advertisements for illicit commercial sex and was a website wherein sex traffickers frequently advertised adults and children for sex.

20. In November 2017, Backpage.com provided the FBI records regarding advertisements associated with telephone numbers provided to your affiant from FBI PG Division related to the instant human trafficking investigation. An analysis of the Backpage.com records revealed an additional twenty-five telephone numbers and five e-mail addresses associated with Backpage.com advertisements for various massage parlor locations directly tied to ████████ and **Williams**.

21. In April 2018, the FBI seized Backpage.com and affiliated websites as part of an ongoing criminal investigation involving conspiracy to facilitate prostitution and money laundering.³ However, just prior to Backpage.com being taken over by the FBI, Backpage.com

³ See <https://www.justice.gov/opa/pr/justice-department-leads-effort-seize-backpagecom-internet-s-leading-forum-prostitution-ads>

provided a large volume of relevant records to the FBI. The Backpage.com records were reviewed and analyzed, resulting in the following partial summary:

- a. The total number of Backpage.com advertisements connected to **Williams** and [REDACTED] was approximately 6827. Of the approximate 6827 advertisements, approximately 5274 were associated with multiple locations in Florida, approximately 1239 were associated with multiple locations in Pennsylvania, and approximately 314 were associated with one location in Virginia.
- b. The advertisements purchased by **Williams** and [REDACTED] totaled approximately \$63,952.57.
- c. The advertisements consisted of describing “new cute girls,” “getting your kinks rubbed out by an Asian hottie,” and other such similar descriptions, which tended to focus on the Asian females and used sexually suggestive wording.

Workers Associated with Multiple Massage Business Locations

22. During the course of the investigation, your affiant positively identified numerous Asian females, all of whom purported to be employed as massage therapists at businesses owned, operated or associated with **Williams** and/or [REDACTED]. The identified Asian females have all had direct contact with law enforcement based upon suspicion of prostitution and/or child abuse.

23. The Asian females are as follows:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Nine of the twelve Asian females maintained driver's licenses and/or identification cards issued from the State of New York, which is a suspected source state for human trafficking from Asia.

24. According to various law enforcement reports, the following have been arrested for prostitution one or more times:

[REDACTED]

i. January 2016 Arrest in Jacksonville, Florida

[REDACTED]

ii. September 2011 Arrest in New York

iii. September 2013 Arrest in New York

iv. June 2018 Arrest in Jacksonville, Florida

[REDACTED]

v. December 2010 Arrest in California

[REDACTED]

vi. January 2012 Arrest in New Jersey

vii. June 2013 Arrest in Maryland

- viii. January 2014 Arrest in New Jersey
- ix. January 2014 Arrest in New York
- x. February 2015 Arrest in Maryland
- xi. December 2015 Arrest in South Carolina

████████████████████

- xii. May 2018 Arrest in Utah

████████████████████

- xiii. June 2018 Arrest in Jacksonville, Florida

25. All twelve of these Asian females arrived in the United States from China and have traveled extensively throughout the United States. Based upon your affiant's training and experience, and knowledge of this investigation, this is indicative of trafficking/moving females to different massage parlor locations. Moreover, a review of records conducted by the Department of Homeland Security revealed that multiple Asian females identified by law enforcement as employed by **Williams** ██████████ appear present in the United States illegally.

Department of Homeland Security Immigration Review

26. During the course of the investigation, over one hundred Chinese nationals have been noted as having direct ties to **Williams** and/or ██████████ and any one of their suspected businesses. However, for the purposes of this instant investigation, your affiant submitted to Homeland Security Investigations, ██████████, only the relevant names of the Chinese nationals who have direct ties to the Pensacola area of operation as a result of **Williams** and/or ██████████ directing their movement to this area. Approximately 28 names (along with biographical information, some of which was obtained from photographs located in **Williams's** Google account pursuant to federal search warrant) were submitted for query within various immigration

databases that are utilized by the Department of Homeland Security. The results revealed the following similarities when queried:

- a. Approximately 16 females utilized a “last known address” within New York with 12 females originating specifically from Flushing, NY, despite all being physically located at establishments in Florida. The other females utilized various addresses in California, Pennsylvania, and Florida.
- b. Approximately 19 of the females are considered aliens who are present in the United States without permanent legal status to remain. A further review indicated that these 19 Chinese nationals have applied for an immigration benefit and have temporarily obtained said benefit as they await for their upcoming review and inspection by an Immigration Judge.
- c. Two of the 28 females were not located at all in any immigration databases.

27. Based on speaking with law enforcement officers assisting in this investigation and with others, your affiant knows that if a foreign national/alien was to be admitted legally into the United States, that the name and identifying information belonging to the subject would be located within immigration databases, which demonstrates legal entry into the United States. Having not located two of the females noted above in various immigration databases, it is suspected that both of these females are either: 1) United States citizens who were born in the United States, or 2) illegal aliens who are not eligible to remain in the United States.

28. Based on speaking with law enforcement officers assisting in this investigation and with others, your affiant also knows that a previous investigation⁴ (conducted by FBI New York

⁴ The previous investigation focused on violations concerning the fraudulent filings of asylum applications on behalf of Chinese nationals, which resulted in the convictions of attorneys and preparers responsible for arranging the benefits for the women.

Division and United States Citizenship and Immigration Services) revealed information which relates to the instant investigation concerning the “last known addresses” supplied by the women to immigration services upon their application for an immigration benefit (see above paragraph 26a).

29. More specifically, Flushing, New York, was identified during the course of the previous investigation to be a “hot bed” of illegal activity, that is, illegal aliens utilized various Flushing, New York, addresses as a central address and point of contact while the illegal aliens (who often worked as prostitutes) continued to move about the United States.

30. During the investigation operated out of New York, law enforcement learned that once mail would arrive to a location, such as “[REDACTED], Flushing, NY,” whoever resided at the residence at the time would then contact the foreign national/alien who the mail was addressed to in order to advise her of the intended communication. This method was utilized so the alien could work elsewhere about the country and not have to remain at the location where she had previously advised immigration officials she would be residing.

31. Several aliens in the instant investigation utilized an address on [REDACTED], Flushing, New York, and a majority of the aliens overall utilized an address in Flushing, New York, as a last known address in order for immigration officials.

Google Account Search Warrant

32. On or about October 1, 2018, your affiant obtained a federal search warrant for Williams’s Google account [REDACTED] and served the search warrant on Google, Inc. On or about November 7, 2018, Google, Inc. responded to the search warrant and provided your affiant with the content of the Google Drive associated with [REDACTED].

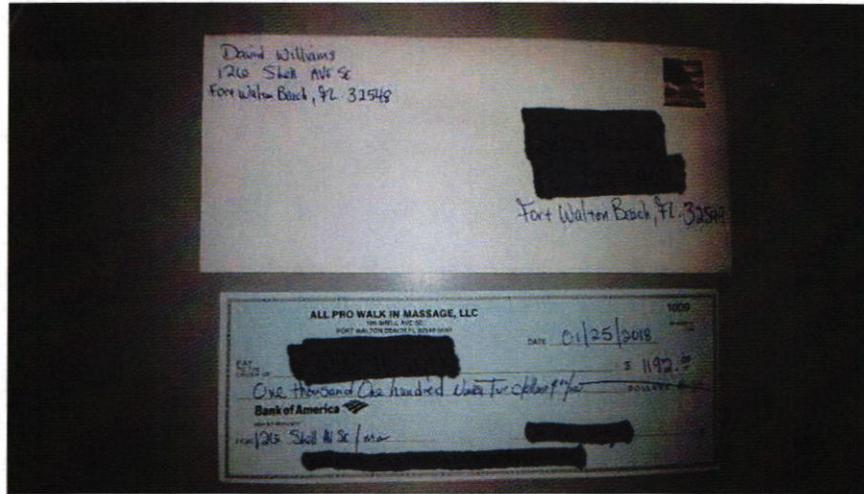
33. **Williams's** Google account contained images of the front and interior of **127 N New Warrington Road, Pensacola, FL 32506**, images of Bank of America Merchant Service documents concerning Asia Pro Walk in Massage, a bill from AT&T addressed to Asia Pro Walk in Massage, and an Escambia County business tax receipt for Asia Pro Walk in Massage. All of the documents listed Asia Pro Walk in Massage LLC's address as **127 N New Warrington Road, Pensacola, FL 32506**.

34. **Williams's** Google account contained images of IRS correspondence concerning an employer identification number for All Pro Walk in Massage LLC, correspondence from the City of Fort Walton Beach addressed to All Pro Walk in Massage LLC, Bank of America bank statement of All Pro Walk in Massage LLC, and a water bill addressed to All Pro Walk in Massage LLC. All of the documents listed All Pro Walk in Massage LLC's address as **126 Shell Avenue SE, Fort Walton Beach, FL 32548**.

35. **Williams's** Google account contained IRS Forms 1099-MISC issued by All Pro Walk in Massage LLC to [REDACTED]. Your affiant knows, based on information provided by IRS-CI [REDACTED], Forms 1099-MISC are information returns often filed by employers to report payments to independent contractors. Your affiant further knows that unscrupulous employers often falsely report their employees as independent contractors in an effort to evade the collection and payment of employment taxes and/or attempt to shield themselves from the employment or activities of their employees.

36. **Williams's** Google account also contained images of checks drawn of the All Pro Walk in Massage LLC bank account made payable to [REDACTED] that noted **126 Shell Avenue**. Some of these checks appear to have been photographed with envelopes addressed to [REDACTED]

that list **Williams** as the sender (see image below). Your affiant believes these payments are related to the rental of **126 Shell Avenue SE, Fort Walton Beach, FL 32548**, by **Williams**.



37. **Williams's** Google account contained images of Commercial Liability Insurance concerning All Day Walk in Massage and [REDACTED], multiple client comment cards of All Day Walk in Massage, and an invoice from [REDACTED] addressed to **Williams** at **3268 Fordham Parkway, Gulf Breeze, FL 32563**. All of these documents concerning All Day Walk in Massage LLC listed its address as **3268 Fordham Parkway, Gulf Breeze, FL 32563**. **Williams's** Google account also contained an image of a check drawn on the All Day Walk in Massage LLC bank account made payable to [REDACTED] and noted "**3268 Fordham Pkwy**" in the memo line. The check appears to have been photographed along with a UPS shipping label addressed to [REDACTED] and lists **Williams** as the sender. Your affiant believes this check was for the rental or insurance of **3268 Fordham Parkway, Gulf Breeze, FL 32563**, by **Williams**.

38. **Williams's** Google account contained photographs of various documents pertaining to violations ranging from unlicensed massage workers to prostitution at multiple massage parlor locations. Specifically, **Williams** had the following documents in the account:

- a. A photograph of a document from the Florida Department of Health dated June 29, 2016, indicating [REDACTED] had been arrested for practicing massage therapy without a license at Health First Florida, 6871 Southpoint Parkway, Jacksonville, Florida. Additionally, the document stated the females admitted to using the business location as their primary domicile, as evidenced by mattresses, personal hygiene items, pillows, suitcases with clothes and a refrigerator with food.
- b. A Preliminary Hearing Notice Summons for Criminal Case and a police complaint document pertaining to a prostitution arrest on [REDACTED] at Thai Massage, 39 West Main Street, Carnegie, Pennsylvania, by the Allegheny Police Department and Carnegie Police Department.
- c. A photograph of an "Order Vacating And Setting Aside Conviction" from Duval County, Jacksonville, Florida, reference case number 16-2016-[REDACTED]. The case number pertains to a criminal charge of "Offering for Prostitution" against [REDACTED], from September 5, 2016.
- d. Two Florida Department of Health Case Summary records (DOH-Form200) citing: 1) the Massage Establishment, Massage University Boulevard LLC, 1832 University Boulevard South, Jacksonville, Florida, and 2) massage therapist [REDACTED], with attempting to induce a client in sexual misconduct and attempting to engage in sexual misconduct, respectively.
- e. Photographs of various forms of identification such as passports, massage licenses for Florida and Pennsylvania, driver's licenses for New York, Pennsylvania, Florida, California and Georgia, Social Security cards,

identification cards for New York, employment authorization cards and Permanent Resident cards for approximately three dozen Asian females.

- f. Various documents such as Articles of Incorporation, business licenses, utility bills, checks, and bank statements linked to approximately 20 massage parlor locations in Pennsylvania, Florida, and Massachusetts.
- g. Photographs of **Williams** working on several massage parlor locations, and doing various construction jobs and maintenance tasks, such as building walls, plumbing, and hanging signs.
- h. Photographs of handwritten ledgers on lined paper listing the initials of the Asian females and the dates, times and “tips” for massages.
- i. E-mails for airline tickets purchased for Asian females from New York to Florida.

39. **Williams’s** Google account contained internally taken screenshots of a cellular telephone, as well as externally taken screenshots of other cellular telephones. There were also screenshots/photographs taken of a Windows HP laptop, in which screenshots showed searches for real estate properties in Tampa and Panama City, Florida, research for Google Ad Words for Tampa Walk In Massage location with another other open tab titled “Massage in Pana...”.

Airline Transportation of Aliens

40. A review of **Williams’s** Google account along with **Williams’s** American Express credit card⁵ statements revealed **Williams** purchased approximately 24 airline tickets for over a dozen Asian females between April 2017 and October 2017. A majority of the airline tickets

⁵ American Express account belonging to David **Williams** ending in 1000.

purchased were to/from New York (La Guardia Airport and JFK Airport) with Florida destinations.

41. Three of said Asian females, [REDACTED]⁶ were previously tied to massage parlors operated by **Williams**. Additionally, [REDACTED] had been previously arrested for prostitution in Jacksonville, Florida.

Jacksonville Sheriff's Office - Prostitution Investigation

42. In July 2018, a prostitution investigation was conducted by the Jacksonville Sherriff's Office (JSO), at the massage parlor locations of 6715 Wilson Boulevard and 1832 University Boulevard, in Jacksonville, Florida. The investigation resulted in the arrest of an Asian female at each location after the investigator was offered sexual favors in exchange for money.

6715 Wilson Boulevard Location

43. During the arrest at 6715 Wilson Boulevard, known as Wilson Massage, LLC, the Asian female, later identified as [REDACTED], produced a New York State driver's license number [REDACTED] and a massage license [REDACTED].

44. A massage license, [REDACTED], expiring on 08/31/2019, for [REDACTED] was also located at the business location. [REDACTED] was not present at the time of the arrest.

45. Investigators observed surveillance cameras in the business, which appeared to be monitored remotely as there were not any monitors on site to view what the surveillance cameras were capturing.

⁶ [REDACTED]

46. Additionally, as investigators were escorting [REDACTED] out of the business, [REDACTED] pulled away from the investigator, went up to one of the surveillance cameras mounted on the wall, and began speaking in Chinese into the camera.

1832 University Boulevard Location

47. During the arrest at 1832 University Boulevard, known as Massage University Boulevard, an Asian female later identified as [REDACTED], produced a New York state driver's license number [REDACTED]. [REDACTED] also produced a massage license [REDACTED], expiring on 08/31/2019.

48. According to the Department of Homeland Security, [REDACTED] was residing illegally in the United States.

49. Two other Asian female workers were identified in the business during the arrest:

a. [REDACTED], produced a New York driver's license number [REDACTED] and a massage license [REDACTED], expiring on 08/31/2019.

b. [REDACTED], produced a Florida learner's license number [REDACTED] and a massage license [REDACTED], expiring on 08/31/2019.

50. Tax receipts and Florida Limited Liability information present at the massage business listed [REDACTED] as the owner and registered agent.

51. Investigators also observed the massage parlor was being used as a place of residence. Investigators observed in a separate room designated for the Asian females to sleep, clothing hanging in the laundry room, a fully stocked kitchen, beds with sheets and other personal items. Two surveillance cameras were also found inside the business near the room where the Asian female workers slept.

52. The Business Tax Receipt listed the following information: Name: Massage University Boulevard LLC., [REDACTED]. Address: 1832 S. University Boulevard Suite S, Jacksonville, FL. 32216.

53. At both Jacksonville massage locations, investigators observed hand written pages⁷ (i.e. journals and/or ledgers) with names or initials next to lists of times and monetary amounts, indicating the number of sales the massage therapist made each day. There were also a small number of sales receipts found within each business showing payments from individuals through credit card transactions.

Clearwater Police Prostitution Investigation

54. In August 2018, the Clearwater Police Department received a tip from a former employee of Asian Massage Clearwater, LLC, 2106 Drew Street #104, Clearwater, FL 33765. The tipster advised that at least two females were sleeping and showering at the business and the tipster left the business because the owner demanded that the tipster work long hours and forced the tipster to live at the massage parlor. The tipster advised the female owner's "boyfriend" is **Williams**. The Clearwater Police Department also received an anonymous letter sent to the police station advising that illegal services are being offered at the massage parlor located at 2106 Drew Street #104, Clearwater. The letter indicated that a male and a female are running the massage parlor and stated "I hope that more girls will not get hurt anymore."

55. On or about November 29, 2018, the Clearwater Police Department (CPD) and Florida Department of Health and Code Enforcement (DHCE) conducted a special detail at Asian Massage Clearwater located at 2106 Drew Street #104. While surveilling the business, officers

⁷ The handwritten pages photographed by Jacksonville Sheriff's Office at both locations were identical to the ledgers discovered during a trash cover in August 2018 from All Day Walk-In Massage, 3268 Fordham Parkway, Gulf Breeze, Florida.

observed five separate customers enter and exit the business, all of whom were male. Thereafter, CPD sent two undercover officers into the massage parlor to receive massages. One of the undercover officers received a massage and was offered prostitution services. Specifically, upon entering the business, the undercover officer (UCO) was met at the front counter by an Asian female later identified as [REDACTED]. [REDACTED] asked the UCO if he wanted a massage and advised that it would be \$60. UCO agreed and provided [REDACTED] with \$60. UCO was led to a massage room and was told to take off his clothes. During the massage, [REDACTED] asked the UCO "what do you want?" UCO replied "anything." Thereafter, [REDACTED] made a stroking gesture with her hand and asked "does it work?" UCO responded affirmatively and [REDACTED] immediately grabbed the UCO's genitals under his towel and underwear. UCO ended the encounter and [REDACTED] requested a "\$20 tip." Your affiant believes, based upon the investigation to date, that "tip" is parlance for monetary payment for illicit sexual services.

56. After the prostitution offer by [REDACTED], CPD officers entered the massage parlor to arrest [REDACTED]. While inside the business, CPD and DHCE identified two other Asian females who were present, [REDACTED]. The officers observed that the massage parlor had a back room with blankets and pillows; there were also facilities for cooking, eating, and showering. It was evident to the officers on scene that at least 2-3 people were living at 2106 Drew Street #104, Clearwater. Officers also observed a ledger on the front desk that appeared to be a daily sheet documenting the activities of each of the three females, including the beginning and ending times of massages and dollars collected.

57. [REDACTED] agreed to speak with the officers and advised that she was brought to 2106 Drew Street #104, from Miami by **Williams**. While discussing **Williams**, [REDACTED] looked at one of the security cameras inside of 2106 Drew Street #104, and advised that **Williams** probably saw the

officers on the camera. Officers observed security cameras mounted in the entryway and in the hallway leading to the massage rooms. When asked by the officers how she is paid, ■ stated that she splits the money with **Williams**. At approximately 12:45 AM, while officers were finishing their detail at 2106 Drew Street #104, they observed **Williams** pull into the parking lot in his 2016 Ford F-150 bearing Florida tag ■, but **Williams** didn't exit his vehicle. Some CPD officers relocated and initiated surveillance of **Williams**. After all CPD officers had departed 2106 Drew Street #104, the surveillance team observed **Williams** exit his vehicle along with ■. At approximately 2:30 AM, officers observed **Williams** and ■ depart the massage parlor; ■ remained inside.

Okaloosa Sheriff's Office Prostitution Investigation

58. Between on or about March 27, 2019, and April 3, 2019, the Okaloosa County Sheriff's Office (OCSO) in Northern Florida conducted a special detail to investigate reports of prostitution occurring at All Pro Walk in Massage LLC, **126 Shell Avenue SE, Fort Walton Beach, FL 32548**. An undercover OCSO investigator, with a recording device and a radio transmitter, entered the business and requested a massage. The investigator received a massage and was not offered prostitution services. A few days later, a different undercover OCSO investigator entered the business and requested a massage. During the massage, the investigator was offered prostitution services for an extra \$40. During this encounter the investigator possessed a digital recording device.

Gainesville Police Department Prostitution Investigation

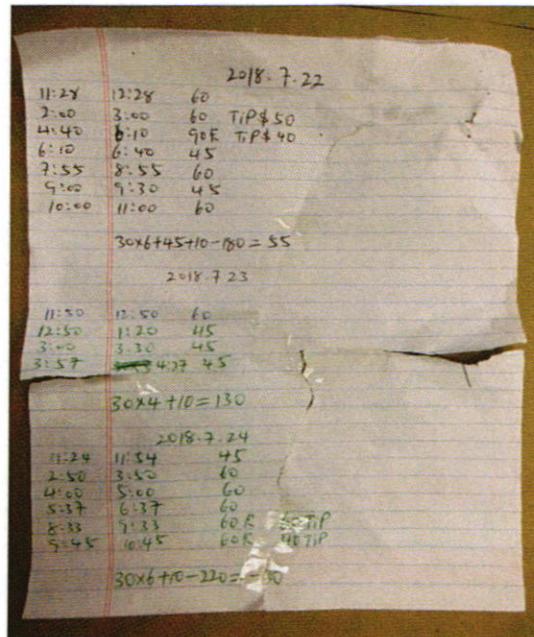
59. On or about July 1, 2019, Gainesville Police Department (GPD) conducted a prostitution detail at Tokyo Massage, 211 SW 4th Avenue, Suite 5, Gainesville, Florida. During the prostitution detail, an undercover officer went into the massage parlor and purchased a \$40

massage. During the massage, the massage therapist offered to perform a sexual act on the undercover officer. The undercover officer declined the offer.

60. During the prostitution detail, the undercover officer noticed the front door to the massage parlor was kept locked. The front door was unlocked and opened by an Asian female each time a customer arrived and/or left the massage parlor.

Trash Covers

61. In July and August 2018, law enforcement collected refuse from a trash receptacle beside the street at **3268 Fordham Parkway, Gulf Breeze, FL 32563**. Your affiant discovered numerous hand-written ledgers that appeared be an accounting of daily revenues (see image below). The ledgers appeared very similar to the ones observed by CPD at 2106 Drew Street #104, Clearwater. Your affiant notes that the typical amounts, \$60 and \$45, shown in the ledgers collected from the refuse at **3268 Fordham Parkway, Gulf Breeze, FL 32563** correspond with the amounts the UCOs were charged at Asian Massage Clearwater.



62. Your affiant also discovered two Delta airline boarding passes for [REDACTED]. One boarding pass was from “NYC-La Guardia” to “Atlanta” on flight DL2881, and the other boarding pass was from “Atlanta” to “Pensacola” on flight DL1156. The date of the boarding passes was “30 JUL,” without reference to a year.



63. Your affiant knows, based on his knowledge and experience, that owners and managers of businesses, both legal and illegal, typically maintain records that document their income and expenses. Your affiant finds it reasonable to believe that financial records, such as those found in the refuse collected from **3268 Fordham Parkway, Gulf Breeze, FL 32563** and observed by CPD at 2106 Drew Street #104, Clearwater, will be found at each of the locations to be searched.

Rub Maps Reviews

64. Based on your affiant’s training and experience, Rub Maps⁸ is one of many websites utilized to post reviews of massage parlors. The Rub Maps website, which is based in

⁸ Rub Maps is a subscription based service. Subscription rates are \$19.95 monthly. Reviews can only be seen by subscription paying customers.

Switzerland, states they are the “Internet’s #1 massage parlor review site offering high quality honest AMP reviews, written by real users.”

65. The reviews on Rub Maps provide information on the massage parlors’ physical location, contact information, rates, hours of operation, details of the massage by the user, rating for the massage provider and the services performed. In the “Provider Details,” there are categories for a provider’s ethnicity, age, height, eye and hair color, hair length, breast size, implants, build, “rate ass,” “kitty,” etc. In the “Services Performed” section, there are pre-labeled services such as: “Finger The Pussy,” “Lick The Pussy,” “Breast Play,” “Blowjob,” “Ass-Play,” “Handjob,” “Prostate Massage,” etc. See below example image:

MP Review					
Visit Date	September 2018	Private Location	X	Time of visit	Afternoon
Recommend	✓	Parlor type	Residence	Paid to House	\$60

Massage Parlor Details:

Went there in the afternoon for a 60 minute massage. Was greeted by a nice middle aged Asian lady. She took me to the room where I waited until she finished another massage. He left and she case and started my massage. Another customer came in and she put him in the room and said she would be back in 10 minutes. 15 minutes later the guy was done and she came back into my room for 5 minutes until another customer came. She put him in a room and told me she would be back in 10 minutes but would make it up to me later I agreed and she came back and told me to flip. Asked me what I wanted and I requested BBBJ but she said I was to big so HJ with tits out was the deal. Next time I will ask for CFS and see what she says. All in all I got what I came for and so did the other guys. Lol

Provider's name: Forgot to ask					
Provider Details:					
Recommend?	✓	Eye color	Brown	Build	Average
Provider Rating	★★★★☆	Hair color	Brown	Rate Ass	Nice & Round
Ethnicity	Asian	Hair Length	Shoulder Length	Kitty	?
Age	41-45	Breast Size	B	Tattoos	X
Height	5'0"-5'5"	Implants	X		
Services:					
Service Rating	★★★★☆	Lick The Pussy	X	Massage Rating	★★★★☆
Finger The Pussy	X	FS	X	Ass-Play?	X
Kissing	✓	Breast-Play?	✓	Handjob	✓
Tipping Issue?	X	Blowjob	X	Prostate Massage	X
				Extra Tip	\$40

More Details:

I would and probably will go back to see if other services are on the menu. She had a really nice ass and I want to get behind it.

66. The following is a sample of reviews that were submitted for the following locations linked to **Williams** and pertaining to the instant investigation:

- a. Asia Pro Walk In Massage, **126 Shell Ave, Fort Walton Beach, Florida**, had a total of 10 reviews between December 2017 and May 2019. One or more of the reviews indicated the following services were provided: hand job, prostate massage, bare back blow job, breast-play, kissing, lick the pussy and ass-play. The extra tips ranged from \$40.00 to \$140.00.
- b. All Pro Walk In Massage, 2106 Drew Street, #104, Clearwater, Florida, had a total of four reviews between January 2018 and April 2019. One of more of the reviews indicated the following services were provided: hand job, breast-play, ass-play, finger the pussy and kissing. The extra tips ranged from \$40.00 to \$140.00.
- c. Tokyo Massage, 211 SW 4th Ave, Suite 5, Gainesville, Florida, had a total of 11 reviews between February 2018 and May 2019. One of more of the reviews indicated the following services were provided: hand job, breast-play, ass-play, prostate massage, kissing, blow job and finger the pussy. The extra tips ranges from \$40.00 to \$100.00.
- d. Massage University, 1832 University Boulevard S, Jacksonville, Florida, had a total of 29 reviews between March 2016 and December 2018. Twenty five reviews indicated a hand job had been performed. One or more of the reviews indicated the following services were also provided: prostate massage, blowjob, breast-play, kissing, finger the pussy and ass-play. The extra tips ranged from \$20.00 to \$140.00.

- e. Wilson Massage, 6715 Wilson Boulevard, Jacksonville, Florida, had a total of four reviews between April 2018 and May 2019. One or more of the reviews indicated the following services were provided: hand job, breast-play, finger the pussy and ass-play. The extra tips ranged from \$40.00 to \$60.00.
- f. Oriental Peony, 6817 Southpoint Parkway, #201, Jacksonville, Florida, had a total of 17 reviews between September 2015 and September 2017. All 17 reviews indicated a hand job had been performed. One or more of the reviews indicated the following services were also provided: breast-play, ass-play, prostate massage, blow job, finger the pussy. The extra tips ranged from \$30.00 to \$100.00.
- g. Asian Massage, 696 Warrenton Road, Fredericksburg, Virginia, had a total of seven reviews between March 2018 and January 2019. One or more of the reviews indicated the following services were provided: hand job, prostate massage, breast-play and ass-play. The extra tips ranged from \$40.00 to \$60.00.

Financial Records Analysis

67. During the course of the investigation, Bank of America Account ending in 0716 was identified as **Williams's** primary personal bank account. Records show that **Williams** opened the account on or about July 16, 2014. Analysis of the account revealed that between December 7, 2017, and March 7, 2019, the account received deposits totaling approximately \$137,506. Deposits to the account consisted primarily of cash and transfers from Bank of America account ending in 8882.

68. Records obtained from Bank of America show that on or about July 6, 2017, **Williams** opened Bank of America account ending in 8882. The account is a business checking

account titled "AAA Pro Sales Corp." On the account opening documents, **Williams** identified himself as the President, Secretary, and Director of AAA Pro Sales Corp. Analysis of the account shows that between December 1, 2017, and March 31, 2019, the account received deposits totaling \$282,889. The account was funded primarily by transfers from Bank of America account ending in 0716, cash deposits, and transfers from:

- a. Bank of America account ending in 9158, titled Asian Massage Clearwater LLC;
- b. Bank of America account ending in 2593, titled Asian Massage Tampa LLC;
- c. Bank of America account ending in 0616, titled Asia Pro Walk in Massage LLC
- d. Bank of America account ending in 8477, titled All Pro Walk in Massage LLC;
- e. Wells Fargo Bank account ending in 5386, titled All Day Walk in Massage LLC;
- f. Bank of America account ending in 4461, All Day Walk in Massage LLC.

69. Bank of America records show that account ending in 9158 was opened in Destin, Florida, on or about November 28, 2017, by [REDACTED], and the account was titled Asian Massage Clearwater LLC. The address listed on the bank statements is 2106 Drew Street. #104, Clearwater, FL 33765. Analysis of the account revealed that between November 28, 2017, and February 27, 2019, the account received deposits totaling approximately \$163,349.00. These deposits were in the form cash and linked merchant account transfers. During the course of the investigation, it was discovered that each of **Williams's** massage parlors accepted credit and debit cards as forms of payment for services rendered. When a customer's credit or debit card was charged, the funds were deposited into the massage parlor's merchant account and then automatically transferred to the corresponding massage parlor's bank account.

70. The funds appear to have been used to pay costs associated with operating the massage parlor such as utilities, advertising, wages and to make payments to **Williams**. The

monthly checks were written from the account to Asian females, who were paid between \$1,200 and \$1,500 per month. Your affiant identified checks to nine different Asian females, four of whom have been positively identified by law enforcement.

71. Bank of America records show that account ending in 2593 was opened on or about April 6, 2018, by [REDACTED], and the account was titled Asian Massage Tampa LLC (see paragraph 15 above, related to **704 Massachusetts Avenue**). The address listed on the bank statements is 10422 N Florida Ave., Tampa, FL 33612. Analysis of the account revealed that between April 6, 2018, and April 30, 2019, the account received deposits totaling approximately \$144,599.00. These deposits were primarily in the form of cash and linked merchant account transfers. The funds appear to have been used to fund cash withdrawals, pay costs associated with operating the massage parlor such as utilities, advertising, rent, and wages, and to make payments to **Williams**.

72. Bank of America records show that account ending in 0616 was opened on or about October 12, 2017, by [REDACTED], and the account was titled Asia Pro Walk in Massage LLC. The address listed on the bank statements is **127 N New Warrington Road, Pensacola, FL 32506**. Analysis of the account revealed that between October 12, 2017, and February 28, 2019, the account received deposits totaling approximately \$165,319.00. These deposits were in the form cash and linked merchant account transfers. The funds appear to have been used to fund cash withdrawals, pay costs associated with operating the massage parlor such as utilities, advertising, rent, and wages, and to make payments to **Williams**. Your affiant identified checks to seven different Asian females, three of whom have been positively identified by law enforcement.

73. Bank of America records show that account ending in 8477 was opened on or about October 2, 2017, by [REDACTED], and the account was titled All Pro Walk in Massage LLC.

The address listed on the bank statements is **126 Shell Avenue SE, Fort Walton Beach, FL 32548**. Analysis of the account revealed that between October 2, 2017, and February 28, 2019, the account received deposits totaling \$191,237.00. These deposits were in the form cash and linked merchant account transfers. The funds appear to have been used to pay costs associated with operating the massage parlor such as utilities, advertising, rent, and wages, and to make payments to **Williams**. Your affiant identified checks to five different Asian females, two of whom have been positively identified by law enforcement.

74. Wells Fargo Bank records show that account ending 5386 was opened on or about October 23, 2017, by [REDACTED], and the account is titled All Day Walk in Massage LLC. The address listed on the bank statements is **3268 Fordham Parkway, Gulf Breeze, FL 32563**. Analysis of the account revealed that between October 23, 2017, and October 24, 2018, the account received deposits totaling approximately \$93,424.00. These deposits were primarily in the form cash and linked merchant account transfers. The funds appear to have been used to pay costs associated with operating the massage parlor such as utilities, advertising, rent, and wages, and to make payments to **Williams**. Your affiant identified checks to four different Asian females, two of whom have been positively identified by law enforcement.

75. Wells Fargo Bank records show that account ending in 5386 was closed on or about October 24, 2018. On or about September 24, 2018, Bank of America account ending in 4461 was opened by [REDACTED] and titled All Day Walk in Massage LLC. The address listed on the Bank of America statements is **3268 Fordham Parkway, Gulf Breeze, FL 32563**, so this account appears to have replaced the aforementioned Wells Fargo account upon closure. Analysis of the account revealed that between September 24, 2018, and January 31, 2019, the account received deposits totaling approximately \$18,941. These deposits were primarily in the

form cash and linked merchant account transfers. Immigration queries were conducted and revealed that [REDACTED] is not legally present to remain in the United States if encountered due to the fact that [REDACTED] overstayed the terms of her visa which expired on or around June 2015.

76. The multiple bank account analysis revealed a pattern of payments to Asian females. Most of the payments ranged between \$1,200.00 and \$1,500.00. The checks often noted "base pay" and/or the address of the massage parlor in the memo line. Based on your affiant's knowledge of the investigation and analysis of bank records, your affiant believes these checks to be salary payments to masseuses who work at **Williams's** massage parlors. Your affiant observed that the accounts didn't contain checks to every masseuse known to have worked at **Williams's** massage parlors. For example, no checks were made payable to [REDACTED], the massage therapist arrested by CPD, or [REDACTED] another massage therapist encountered by CPD. Your affiant knows, based on his knowledge and experience, and conversations with Homeland Security Investigations [REDACTED], that individuals who illegally harbor aliens for financial gain will often hold debts over harbored aliens for things such as entry into the United States, housing, food, transportation, and employment, among other things, and the aliens are often required to repay these debts through labor.

77. During the analysis of the subject massage parlor bank accounts, cash deposits to the accounts were relatively rare. Often times weeks or months would pass between the cash deposits. The cash deposits were typically in large even dollar amounts between \$2,000.00 and \$10,000.00, and some were conducted outside of the geographic area of the massage parlor. For example, multiple cash deposits made to the Asian Massage Clearwater account were conducted approximately 500 miles away in Pensacola, FL. Based on your affiant's knowledge and experience, your affiant knows that small businesses typically deposit cash receipts on a regular

basis; often daily or weekly depending on the business. Based on your affiant's investigation and analysis of bank records, your affiant believes that cash generated by the subject massage parlors accrue at the parlors until **Williams** visits the parlor to collect it. Your affiant believes that **Williams** maintains the cash and deposits it as needed to the various massage parlor bank accounts, his AAA Services business bank account, and his personal bank account. In total, as noted above and as learned during the course of the investigation, over \$1,000,000 has passed through the relevant bank accounts that are linked to **Williams** and his illicit activity since late 2017.

78. Your affiant believes **Williams** has tried to conceal his financial gain by directing his earnings through a business bank account titled AAA Pro Sales Corp, as well as attempted to conceal his ownership of the massage parlors by installing nominees as corporate officers and as signatories on the massage parlor bank accounts. Lastly, **Williams** used funds generated by harboring illegal aliens to pay the salaries and expenses of operating the massage parlors, thereby promoting the scheme, all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) and Title 18, United States Code, Section 1956(h) – conspiracy to commit money laundering.

Recent Surveillance of Locations

79. On or about July 9, 2019, your affiant learned through surveillance conducted by law enforcement personnel that **Williams** was observed at **7055 Fairfield Drive, Pensacola, Florida**. **Williams** was observed on the front porch smoking a cigarette and his vehicle has been observed parked at the location at various hours of the day. Through the surveillance, it appears as though **Williams** is currently residing at **7055 Fairfield Drive, Pensacola, Florida**. Moreover, on or about July 3 and July 30, 2019, United States Magistrate Judge Elizabeth M. Timothy authorized tracking warrants for the cellular telephone of **Williams**. During the month

of July 2019, your affiant has surveilled **Williams** appearing to reside at the **7055 Fairfield Drive** location as well as traveling back/forth to the Tallahassee and Tampa areas (which are cities both known to have massage parlor locations related to Williams, as enumerated in paragraph 14 above). In addition, surveillance of all five relevant locations within the last thirty days reveals they all remain active massage parlors – that is:

A-1. **704 Massachusetts Avenue, Pensacola, Florida 32505**

A-2. **7055 Fairfield Drive, Pensacola, Florida 32505**

A-3. **127 N New Warrington Road, Pensacola, Florida 32506**

A-4. **126 Shell Avenue SE, Fort Walton Beach, Florida 32548** and

A-5. **3268 Fordham Parkway, Gulf Breeze, Florida 32563**

Indeed, **Williams** has been electronically surveilled near what appears to be one of his most recent massage parlors - **704 Massachusetts Avenue, Pensacola, Florida 32505**. The aforementioned cellular telephone tracking warrant has placed, within the past two weeks, **Williams** on **Massachusetts Avenue**, and your affiant has surveilled an Asian female located there behind a chain link fence topped with razor wire (see below):



80. Based on the facts and circumstances set forth in this affidavit, you affiant believes there is probable cause to believe 1) **Williams** is harboring illegal aliens for commercial and private financial gain, 2) **Williams** is conspiring to launder the proceeds from the illicit massage parlors, and 3) **Williams** is utilizing interstate commerce facilities in managing his prostitution business - all in violation of federal law. In sum, **Williams** owns/operates multiple massage parlors that are held in nominee names, he staffs them with Asian females and said females engage in illicit sexual acts with massage customers (and the females appear to be illegally present in the United States), and he utilizes bank accounts associated with the massage parlors to clean the funds garnered from the criminal activity. This has been ongoing for multiple years. The foregoing affidavit establishes there is probable cause to believe that evidence and fruits of criminal activity, more particularly described in Attachment B, currently exists, and will be found within the locations to be searched, more specifically described in Attachments A-1, A-2, A-3, A-4, and A-5.

Your affiant declares under penalty of perjury that the facts stated above are true and correct to the best of your affiant's knowledge and belief.

[REDACTED]
John W. Canning
Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me this [REDACTED] day of August, 2019.

[REDACTED]
Hope T. Cannon
United States Magistrate Judge
Northern District of Florida