1. This is a follow on warrant. Yesterday, in file number 26-mj-491, this Court authorized a search of **Asia Spa Massage –** located at 690 Netherfield St., NW, Comstock Park, MI ("Asia Spa Massage," a.k.a. ""Asian Massage 690").
2. Today (November 10, 2026), agents executed a warrant on the facility at approximately 10:00am. They encountered two female workers at the parlor. There were also two male customers present.
3. The massage parlor has a main entry door in the front of the facility. In the back of the facility, there is a set of stairs leading up from a basement into a rear parking area. When agents approached the parlor, one worker exited the parlor through the ground level front door. The other worker came up the stairs in the rear of the facility and made contact with agents who were surrounding the facility.
4. Agents performed a security sweep of the basement area to ensure there were no other personnel present. While conducting the sweep, they saw a hallway connecting what appeared to be two bedrooms. They saw toiletries and clothing, as well as a small kitchen and laundry area.
5. Based on these facts, I believe the workers were living in the basement of the facility.
6. I know from my training and experience that workers at illicit massage parlors often store bulk cash proceeds among their personal belongings.
7. As discussed in greater detail below, this facility is one of several facilities operated by Wenhan Wang and ZhenZhen Xiao, whose workers employ the services of Chengxia Snelson, an illicit money courier.

8. Based on the facts above and below, I submit there is probable cause to search the basement area of **Asia Spa Massage –** located at 690 Netherfield St., NW, Comstock Park, MI ("Asia Spa Massage," a.k.a. ""Asian Massage 690") for evidence of violations of 18 U.S.C. § 1952 (travel and use of a means or facility of interstate commerce to distribute the proceeds of unlawful activity) and 18 U.S.C. § 1960 (management of an unlicensed money transmission business.)
9. The area I wish to search is described in Attachment A. The evidence I wish to seize is described in Attachment B.
10. The remaining paragraphs repeat the information that was included in

Executive Summary

11. Wenhan Wang (WW) and his wife,[1] ZhenZhen Xiao (ZZX), operate at least three massage parlors where workers offer illegal commercial sexual services to customers.
12. I know this because workers have offered sexual services to investigators during undercover operations conducted at one of their parlors. Additionally, law enforcement tips and online reviews from multiple websites indicate sexual services are available for purchase.
13. WW and ZZX use at least two vehicles, a 2026 Dodge Ram 1500 and a 2024 BMW X6**,** to travel to their parlors to oversee operations. Through both physical and electronic surveillance, investigators have observed WW and ZZX traveling in these vehicles to and from parlors and their residence.

[1] U.S. Department of State records documented in 2013 that ZZX indicated on her on-immigrant visa application that WW was her husband.

14. To distribute the proceeds made from commercial sex, a trusted money remitter travels on the interstate and US-highway systems to pick up cash proceeds from the workers employed at WW and ZZX's massage parlors. Investigators have been investigating the money remitter since November of 2024. Through both physical and electronic surveillance, they have documented the remitter pick up cash from workers at multiple massage parlors associated with other owners. In addition, a former worker from another parlor has spoken with investigators, describing the money remitter's methods and how she picks up and transports proceeds from commercial sex. Physical and electronic surveillance have shown the same remitter making stops at WW and ZZX's parlors that are consistent with the remitter's other money pick-up trips.

15. I make this Continuation in support of an Application for a Search Warrant to search the following, which are also described in Attachment A: the basement of **Asia Spa Massage** – located at 690 Netherfield St., NW, Comstock Park, MI ("Asia Spa Massage," a.k.a. ""Asian Massage 690")

16. I wish to search the locations identified above and in Attachment A for contraband, evidence, fruits, and instrumentalities of violations of Title 18 U.S.C. § 1952 (use of a means/facility of interstate commerce to promote and to distribute the proceeds of unlawful activity). I describe the evidence to be seized more specifically in **Attachment B**.

17. Each of the parlors discussed is engaged in commercial sex, as described below. This is the underlying unlawful activity for Title 18 USC § 1952. Investigators have seen

WW and ZZX perform operational activities related to the massage parlors. WW and ZZX use their Dodge Ram and BMW (collectively, the "Target Vehicles") to operate the massage parlors.

18. Title 18 USC § 1952 defines "unlawful activity" to include a business enterprise involving prostitution offenses in violation of state or federal law. Based on the facts described below, I believe WW and ZZX used one or more facilities of interstate commerce including the US highway systems, merchant processing systems and the banking system to promote, manage, establish, carry on, or facilitate their massage parlors offering illegal commercial sexual services, and to distribute the proceeds of those businesses. WW and ZZX continued to perform acts furthering the businesses, including operating and supplying the parlors and depositing or controlling business proceeds.

19. The trusted money remitter, Chengxia Snelson, and her husband, James Snelson, provide money transmission services to people associated with the places I wish to search. However, neither Chengxia nor James are licensed under Michigan or federal law to operate a money transmitting business. Title 18 U.S.C. § 1960 makes it a crime to manage an unlicensed money transmitting business. Accordingly, I wish to search the properties identified for contraband, evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 1960 (conduct of an unlicensed money transmitting business).

Agent Background

20. I have been a Special Agent with the Federal Bureau of Investigation (FBI) since 2012. I have received training on investigating human trafficking, as further described

below. I am currently assigned to the Detroit Division of the FBI, Grand Rapids Resident Agency, West Michigan Based Child Exploitation Task Force (WEBCHEX), investigating crimes against children and human trafficking. Prior to my current assignment, I was assigned to the FBI Chicago Division, investigating violent crimes.

21. I have received training in human trafficking investigations through the FBI and in coordination with federal, state, and local partners. This training has included instruction on identifying indicators of human trafficking; victimology and trauma-informed interview techniques; investigative strategies involving illicit massage parlors, labor and sex trafficking organizations; financial investigations relating to the laundering of trafficking proceeds; and the use of covert investigative techniques in human trafficking matters. In addition to training, I have participated in human trafficking investigations in coordination with federal, state, and local partners. Through these investigations, I have gained experience in identifying trafficking victims, understanding the methods traffickers use to control victims, and interpreting communications and coded language commonly used by those involved in human trafficking and related money laundering activity. Based on this training and experience, I am familiar with the methods and techniques employed by individuals engaged in prostitution, human trafficking, and related financial crimes.

22. As the coordinator of the West Michigan Based Child Exploitation Task Force, I have conducted operations to include Operation Cross Country, which is an FBI initiative aimed at identifying minors and adults engaged in sex trafficking. In my previous assignment to the FBI Chicago Division, I was assigned to a Gang Squad and

participated in both monitoring Title III intercepts and conducting surveillance while a Title III interception was active. I was also assigned to a violent crimes task force that investigated complex cases such as serial bank robberies, Hobbs Act violations, kidnappings, murder for hire, violent threats, and the apprehension of fugitives, both within and outside the contiguous United States. Many of the investigations involved implementing sophisticated investigative techniques.

23. The statements contained in this document are based upon my training and experience, information acquired during my investigation, as well as information provided by others such as other police officers, and task force officers (TFOs) and special agents of the FBI. Because this document is being submitted for the limited purpose of establishing probable cause for a search, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts I believe necessary to establish probable cause to believe that there is evidence of criminal activity located in the places to be searched.

Massage Parlors WW and ZZX Operate Offer Commercial Sexual Services.

24. In the paragraphs that follow, I will describe evidence that indicates that the workers at WW and ZZX's parlors are offering commercial sex services through investigative activity to include undercover operations, law enforcement tips, and open-source information from the internet.

25. **Asian Massage (Penn)**



a. An undercover operation indicates workers at Asian Massage (Penn) are offering commercial sexual services to customers.

i. *July 23, 2025*

1. On the above date, Ingham County Sheriff's Office conducted an undercover operation at Asian Massage (Penn).
2. The undercover law enforcement officer was sent into the parlor with cash funds to purchase a massage. The undercover was greeted by an unknown Asian female who directed him to a list of services offered. The undercover selected a 30-minute massage for $50. The undercover paid for the massage in a hand-to-hand transaction with the unknown Asian female.
3. The same unknown Asian female led the undercover to a massage room, instructed him to remove his clothes, and performed a back massage on him. The undercover initially left his underwear on, but

the Asian female instructed him to fully undress and cover up with a towel. During the massage, the Asian female removed the towel, touched his penis, and made a gesture that the undercover recognized suggested masturbation of his penis using her hand. The undercover asked if it was extra; the Asian female informed him it was $10. The undercover declined. Following the massage, the undercover exited the massage parlor.

b. Internet reviews and open-source searches further indicate that commercial sexual services are offered at Asian Massage (Penn).

i. An open-source search on bestprosintown.com[2] revealed the following review from October 2023 for Asian Massage (Penn). Based on training and experience I believe "extra services," is another term for commercial sex acts.



ii. An open-source search on bestprosintown.com revealed the following review from September 2025 for Asian Massage (Penn). Based on training

[2] BestProsInTown is an online platform and mobile app designed to connect consumers with top-rated local service professionals across the United States and Canada.

and experience, I believe "special services," is another term for commercial sex acts.



Jordyn Cavanaugh Sep 2025

★☆☆☆☆

THIS PLACE IS HORRIBLE!!! I went in with my friend to get a massage and felt extremely un comfortable the second I walked in. I should have turned around and left instantly. I proceeded to go get the massage and was not told what to do or hardly where I was going. The rooms and the entire building felt like I was in someone apartment. during the massage the lady continuously kept going on her phone wich made me feel as though pictures were taken of me. The lady's were wearing very revealing clothes with should I have been my number one red flag to leave. I come to find out after we left that they offer "special services" wich instantly made feel extremely worried! I never recommend this place and no one should go!! they deserve to get into legal trouble!

iii. An open-source search on Usasexguide.nl[3] revealed a review in May 2025 for Asian Massage (Penn). The reviewer visited multiple massage parlors, one being "Asian Massage on Penn," referring to Asian Massage (Penn), which has an address on Pennsylvania Ave. From my training and experience, I know that "finish" is shorthand for male orgasm. I also know that "UTC" is short for under the clothes. This reviewer also adds "YMMV," which is short for your mileage may vary, meaning customers' experience may differ and then stated, "but at least the girls coming out (female worker exposing her breasts) to play and a little more roaming (reference to sexual touching)

[3] Usasexguide.nl (the forum) is an online forum established in 2018 and hosted in the Netherlands. It serves as a comprehensive platform dedicated to discussing various aspects of the commercial sex industry. This includes detailed discussions and reviews pertaining to escorts, massage parlors, strip clubs, and street-based sex work. The forum offers users access to up-to-date information, providing reviews on sex workers (referred to as providers) and the services they offer. Additionally, it offers advice on safety measures and tips on how to navigate the commercial sex industry. Users of the forum are required to register an account. Once registered, the user chooses a screen name, which allows them to read past forum posts and communicate with other users, even with providers. The forum also allows users to review other users' posts.

seems to be the standard at most non-full-service (sexual intercourse) establishments these days."



05-18-25 13:12 #4872

Member #4025

Senior Member

Posts: 419

Akoya and Asia Massage

I have a couple of reports from the last month with both visits on a weekend day.

Akoya - 1/2-hour massage from Linda, she is Chinese, probably mid-30's, I found her attractive and fit, as AMPs go. English was not strong, but she was friendly and interested in pleasing. Nice massage with light oil and some teasing before the flip, she brought out the girls, nice B, small C, nice but I do hate that the shirt and bra stay on but go up or down to bring them out. Other than roaming with the girls, everything else was OTC roaming, but I did not push it. 50 for the 1/2-hour and 50 for the tip. She seemed pleased and I would return.

Asian Massage on Penn - 1/2-massage from Emma, again Chinese early to mid-30's, she too was attractive and fit, English was better, and she was more playful. Very nice massage, no oil and through a towel, but she focused on my lower back which I asked because I'd strained it doing yard work earlier in the day, I did not mind the towel only as when it was time for the flip there was plenty of soft stroking with the towel off. And on the flip, she was in no hurry, continued the soft strokes, and while not the same tease as Chelsea at MT, it allowed for a bit of an edging sensation and more of a bang on the finish. She also brought the girls out, again, shirt up and bra down, very nice B / Cs, she also allowed some UTC roaming below the waist and I was pleasantly surprised by her nice butt, not too small not to large, just right in my opinion. 50 for the 1/2-hour and 50 for the tip. She seemed pleased and I would return, likely calling ahead for appt with Emma.

Of course, YMMV, but I enjoyed both. Still in search of the unicorn, a 'good massage' with BJ for HE, but at least the girls coming out to play and a little more roaming seems to be the standard at most non-full-service establishments these days. Happy and Safe Hunting everyone. #4025.

Report Post Reply With Quote

c. Considering the undercover operation and the online discussions identifying the same location as a place offering sexual services, I believe Asian Massage (Penn) offers commercial sex for money.

26. **Flint Asian Massage**



a. A law-enforcement tip described commercial sexual activity being offered at Flint Asian Massage:

   i. On March 11, 2023, a male customer of Flint Asian Massage reported to Flint Township Police Department he was sexually assaulted during his massage. According to the male customer, a female worker began rubbing his back side as he laid on his stomach. Once the female worker was finished rubbing his back she asked him to roll over. At that time, she began rubbing his chest and shoulders until she went down and began massaging his penis. She did so until the customer ejaculated. Afterwards, the customer told police that this sexual contact had been unwanted.

b. Internet reviews further indicate that commercial sexual services are offered at Flint Asian Massage.

   i. On August 18, 2024, a user on usasexguide.nl using display name "Jujube" posted the below review concerning Flint Asian Massage on Lennon Road. Based on training and experience, I know the abbreviation "H/E" is short for "happy ending."



ii. On December 18, 2024, an open-source search revealed an adultsearch.com[4] review for Flint Asian Massage in which user "Dude140" stated, "I went here the other day and younger woman maybe around early to mid 20s provided a nice massage followed by a H.J. (short for "hand job") I was already erect as she was touching me and then she saw it once I rolled over. I literally came under a minute because I was so backed up. I recommend this place for sure.



c. Physical surveillance was conducted to determine clientele.

i. *September 30, 2026* - Physical surveillance was conducted at Flint Asian Massage. During the surveillance period of approximately 11:00 AM to 6:00 PM, approximately 10 individuals were observed entering the business. Each individual was an adult male.

ii. *October 1, 2026* – Physical surveillance was conducted at Flint Asian Massage. During the surveillance period of approximately 12:00 PM to 9:00 PM, approximately fourteen individuals were observed entering the business. Two were female, the rest were adult males.

d. Based on the above detailed law enforcement tip and online reviews, I believe Flint Asian Massage offers sexual services for money.

[4] Adultsearch.com is an adult search engine website offering information to find escorts, strip clubs, sex shops, etc.

27. **Asia Spa Massage**



a. Internet reviews indicate commercial sexual services are offered at Asia Spa Massage.

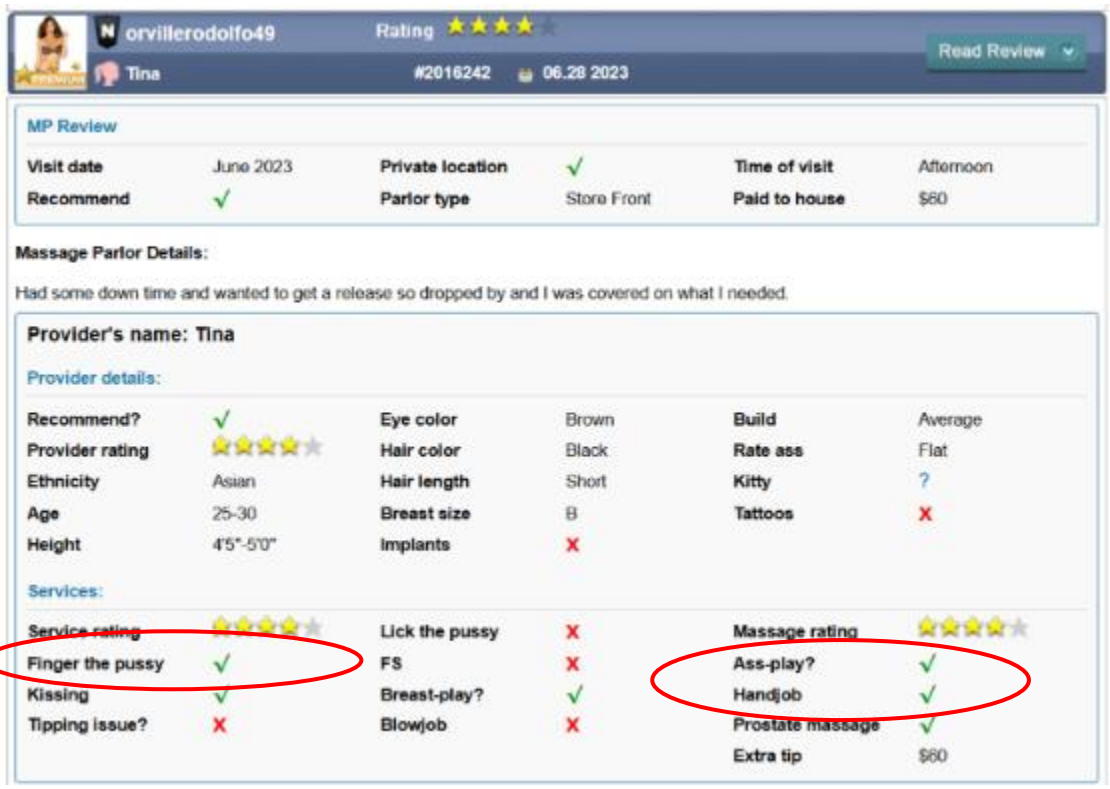
i. An open-source search revealed a June 2023 Rubmaps.ch review for Asia Spa Massage by user "orvillerodolfo49". Based on training and experience, I know "AMP" is short for Asian Massage Parlor.

It was a typical AMP routine. Tina was very pleasant and spoke English well enough to communicate. I would also say I was impressed with the massage I received. She was very thorough. It started out with a no-oil massage over a towel. Then some oil on my back, followed by a hot towel to clean up.

On the flip she started to tease my cock, we reach an agreement, and she starts using those oils on my junk and fondling my balls too. Then she got to my shaft and started to stroke it with both hands, she later leaned in and let me play with her tits, and even allowed me to finger her. She kept going at my dick and inserted a lubed finger in my ass for max pleasure, which made me explode all over the place. We kissed as we both came and that was it.

It was a little nice experience, might come back another time just to see if there is more on the menu.

1. In the section of rubmaps.ch allowing for parlor reviews, "orvillerodolfo49" indicated Asia Spa Massage allows "finger the pussy," "handjob," and "ass play," as shown below.



orvillerodolfo49 Rating ★★★★☆
Tina #2016242 06.28 2023 Read Review

MP Review

Visit date	June 2023	Private location	√	Time of visit	Afternoon
Recommend	√	Parlor type	Store Front	Paid to house	$60

Massage Parlor Details:

Had some down time and wanted to get a release so dropped by and I was covered on what I needed.

Provider's name: Tina

Provider details:

Recommend?	√	Eye color	Brown	Build	Average
Provider rating	★★★★☆	Hair color	Black	Rate ass	Flat
Ethnicity	Asian	Hair length	Short	Kitty	?
Age	25-30	Breast size	B	Tattoos	X
Height	4'5"-5'0"	Implants	X		

Services:

Service rating	★★★★☆	Lick the pussy	X	Massage rating	★★★★☆
Finger the pussy	√	FS	X	Ass-play?	√
Kissing	√	Breast-play?	√	Handjob	√
Tipping issue?	X	Blowjob	X	Prostate massage	√
				Extra tip	$60

ii. An open-source search revealed a July 2023 Rubmaps.ch[5] review for Asia Spa Massage by user "macanudoxil" (shown below). Based on my training and experience, I know "HJ" is short for hand job.

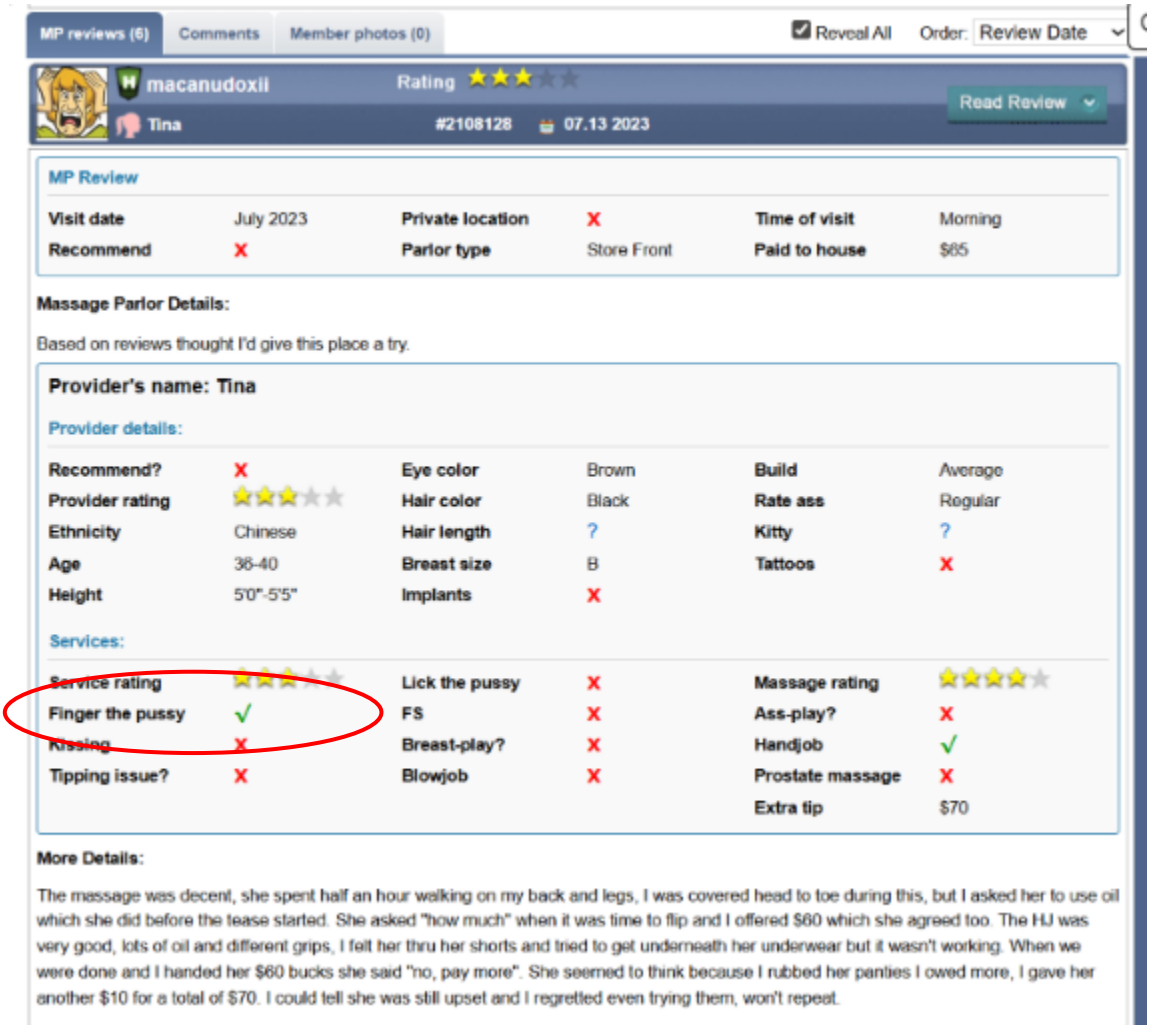
More Details:

The massage was decent, she spent half an hour walking on my back and legs, I was covered head to toe during this, but I asked her to use oil which she did before the tease started. She asked "how much" when it was time to flip and I offered $60 which she agreed too. The HJ was very good, lots of oil and different grips, I felt her thru her shorts and tried to get underneath her underwear but it wasn't working. When we were done and I handed her $60 bucks she said "no, pay more". She seemed to think because I rubbed her panties I owed more, I gave her another $10 for a total of $70. I could tell she was still upset and I regretted even trying them, won't repeat.

1. Reviews associated with Rubmaps.ch contain sections that describe sexual activity reportedly available at the business. For example,

[5] RubMaps.ch is an internet-based massage establishment review website that has historically been used by customers to identify and review massage businesses, including establishments reportedly offering commercial sexual services. Users may post reviews describing their experiences at particular establishments, including information concerning workers, prices, and sexual services allegedly provided.

"macanudoxil's" review indicated a green checkmark next to "finger the pussy," which indicated it's allowed at the parlors and in this context, refers to digital penetration or manual stimulation of the female genitalia.



MP reviews (6) | Comments | Member photos (0) | Reveal All | Order: Review Date

macanudoxil | Rating ★★★☆☆ | Read Review

Tina | #2108128 | 07.13 2023

MP Review

Visit date	July 2023	Private location	X	Time of visit	Morning
Recommend	X	Parlor type	Store Front	Paid to house	$85

Massage Parlor Details:

Based on reviews thought I'd give this place a try.

Provider's name: Tina

Provider details:

Recommend?	X	Eye color	Brown	Build	Average
Provider rating	★★★☆☆	Hair color	Black	Rate ass	Regular
Ethnicity	Chinese	Hair length	?	Kitty	?
Age	36-40	Breast size	B	Tattoos	X
Height	5'0"-5'5"	Implants	X		

Services:

Service rating	★★★☆☆	Lick the pussy	X	Massage rating	★★★★☆
Finger the pussy	√	FS	X	Ass-play?	X
Kissing	X	Breast-play?	X	Handjob	√
Tipping issue?	X	Blowjob	X	Prostate massage	X
				Extra tip	$70

More Details:

The massage was decent, she spent half an hour walking on my back and legs, I was covered head to toe during this, but I asked her to use oil which she did before the tease started. She asked "how much" when it was time to flip and I offered $60 which she agreed too. The HJ was very good, lots of oil and different grips, I felt her thru her shorts and tried to get underneath her underwear but it wasn't working. When we were done and I handed her $60 bucks she said "no, pay more". She seemed to think because I rubbed her panties I owed more, I gave her another $10 for a total of $70. I could tell she was still upset and I regretted even trying them, won't repeat.

iii. On June 10, 2026, a user on usasexguide.nl using display name "SteveLee99" posted the below review for Asia Spa Massage. Based on my training and experience, the term "L1" in the context of this type of review means hand

job, or manual stimulation of the man's penis until orgasm. [6] The language included in the review indicates the interaction cost a door fee related to the length of the massage that is advertised plus $50 for sexual services, in this case manual stimulation of the genitals.



b. A law-enforcement report described commercial sexual activity being offered at Asia Spa Massage:

i. On November 8, 2024, the Kent County Sheriff's Office received information from a man who reported being touched inappropriately while receiving a massage at Asia Spa Massage. According to the complainant, the following events transpired:

1. The man reported he arrived for a thirty-minute massage for a price of $45.00. The man was met by an Asian female worker, who spoke little to no English, to whom he gave a $50.00 bill. The man was led to a room and asked to remove all his clothes. The man expressed

[6] On December 31, 2025, a user on usasexguide.nl using display name "UtrGuy" posted a comment responding to a question from another user with display name "ChastD1959". In the comment, "UtrGuy" confirmed "L1=handy, L2=BJ, and L3=FS." Based on my training and experience, I know "handy" is short for hand job, "BJ" is short for blow job or oral stimulation of the genitals, and "FS" is short for full sex or penetrative intercourse.

feeling more comfortable leaving his boxers on. Twenty minutes into the massage, the worker removed the man's boxers and requested he turn over. After massaging his chest, arms, and legs, the worker forcibly grabbed the man's testicles and penis with one hand and commented, "Does that feel good?" The worker began asking for more money and the man told the worker "No" several times. The worker gave the man $5.00 dollars back, but he told her to keep it for a tip.

ii. In November 2024, law enforcement established surveillance on Asia Spa Massage. During the surveillance period between November and December 2024, Asian females, believed to be workers, were occasionally seen in the area immediately outside of the business, but these females did not otherwise leave the premises. It appeared these women lived at Asia Spa Massage.

c. Law enforcement interactions indicated workers at Asia Spa Massage offer commercial sexual services to customers.

i. On October 14, 2026 – Physical surveillance was conducted by the Kent County Sheriff's Office (KCSO) at Asia Spa Massage. At approximately 8:52 AM, an Asian female driving a gray Honda CR-V, bearing MI license plate EWK5898[7], arrived and the Asian female entered the business without using

[7] According to Michigan Secretary of State records, MI license plate EWK5898 is registered to Qinghua Zhang at 4512 Cloverleaf Dr. SE, Grand Rapids, MI.

a key. A second Asian female, believed to be staying on-site, was also observed entering and exiting the business.

ii. At 1:55 PM, a male arrived in a black GMC Sierra (hereafter referred to as Male 1),[8] entered the massage parlor, and remained inside for approximately one hour before departing.

iii. At 2:59 PM, investigators from the KCSO conducted a traffic stop of the GMC Sierra, driven by Male 1, for improper lane usage. Male 1 was interviewed and stated he had visited Asia Spa Massage for a massage due to a neck injury. Male 1 contacted the massage parlor by telephone and scheduled an appointment the same day. The individual who answered the phone spoke with an accent.

iv. Male 1 paid $73 using his personal credit card, which was $70 for the massage and $3 for the credit card processing fee. Male 1 described the interior of the parlor as unclean and residential in appearance. Male 1 used a restroom while at the parlor, which had a sink and toilet, but no shower. The massage room also appeared to be a converted bedroom. A second female worker observed by Male 1 was older than the female who assisted him.

v. Male 1 described the female worker who gave him a massage as being in her thirties and she spoke limited English. Once inside the massage room, Male 1 removed his clothing, except for his underwear, and positioned himself face

[8] Male 1's identity is known to me through records obtained from the Michigan Secretary of State; however, his name is being withheld to protect his identity.

down on the massage table with a sheet covering his body. The same female worker subsequently entered the room and began providing a massage. During the massage, the female worker removed the sheet covering Male 1 and threw it onto the floor. The female worker then pulled down the back of his underwear, exposing approximately half of his buttocks. Male 1 explained that his hands were positioned near his waist, allowing him to grab the waistband of his underwear and pull them back into place. The female worker continued the massage and pulled down his underwear a second time, again exposing his buttocks. Male 1 verbally told the female worker to stop, pulled his underwear back up, and asked for the sheet to be put back on him.

vi. Male 1 stated that following this interaction, the nature of the massage changed. He explained that the female worker stopped applying what he considered therapeutic pressure and began using lighter pressure that he did not believe was beneficial for his injured neck.

vii. When Make 1 turned onto his back, the female worker asked if she could touch his face, which he declined. Male 1 pulled the sheet up to cover his chest while the female worker continued massaging his arms. He explained that he remained uncomfortable throughout the remainder of the massage. At the conclusion of the massage, the female worker requested a tip, which Male 1 refused.

viii. Male 1 described the business as "suspect," expressing concern that sexual services might be offered at the location. Male 1 explained that the female worker's actions made him uncomfortable, and he believed that if he had become sexually aroused when he turned onto his back, the female may have offered him sexual services.

28.

a. As described below, surveillance has also documented women arriving at and being dropped off at the massage parlors while carrying suitcases, luggage, blankets, and other personal belongings. Based on my training and experience and the circumstances observed during this investigation, I believe these observations are consistent with workers arriving at the parlors with belongings necessary for an extended stay, including potentially residing or sleeping at the businesses.

i. On April 2, 2026, law enforcement observed on video surveillance a dark colored Lexus bearing Michigan license plate EPB 9098 arrive and park in front of Asia Spa Massage. Michigan Secretary of State records indicated the vehicle was registered to a female named RONG HU, with an address 309 N. Sage St. Suite B, Kalamazoo, MI.[9] An Asian female exited the driver's seat of the Lexus and investigators were able to identify the Asian female as RONG HU by comparing to her Michigan Secretary of State driver's license

[9] According to an open-source internet search, 309 N. Sage St. Suite B, Kalamazoo, MI returns Asian Massage Kalamazoo, which according to LARA is an assumed name for Shiatsu Massage, LLC.

photograph. Shortly after, an unidentified Asian female exited the rear passenger seat of RONG HU's Lexus.

ii. Both RONG HU and the unidentified Asian female accessed the trunk of the Lexus. RONG HU assisted the unidentified Asian female in removing her suitcase (shown below).



iii. The unidentified Asian female, carrying a backpack, then rolled the suitcase into Asia Spa Massage. RONG HU retrieved what appeared to be blankets and other belongings from the rear seat and followed the unidentified Asian female into the massage parlor (shown below).



iv. RONG HU later departed in the Lexus but subsequently returned to Asia Spa Massage and appeared to deliver additional supplies before once again departing.

v. Later that same day, law enforcement observed the same Lexus parked at Blessings Massage Bodywork,[10] located at 894 Fuller Ave., Grand Rapids, MI. The vehicle remained at that massage parlor overnight.

b. Based on the above detailed law enforcement report, repeated online reviews over time, and observations during surveillance, I believe Asia Spa Massage offers sexual services for money with workers living on site.

29. Massage parlors operated by WW and ZZX also generate illicit proceeds through electronic payments from customers. As described below, WW and ZZX maintain massage parlor business checking accounts which are funded by electronic payments. Transactional records show that each of these parlors repeatedly charge

[10] According to LARA, Michelle Wang is the registered agent of Blessings Massage Bodywork, LLC.

customer credit cards twice on the same day, which is an indicator that commercial sex is occurring.

a. Based on my training and experience, and my involvement in this investigation, I know that illicit massage businesses offering commercial sex may separate the payment for the massage from the payment for additional sexual services. In such circumstances, a customer may first pay a set fee for the massage, sometimes referred to as a "door fee," and thereafter make a separate payment for additional services provided during the same visit, including a commercial sex act. When both payments are made electronically, this payment structure can result in two separate transactions being processed within a relatively short period of time during the same customer visit.

b. I further know that the existence of two electronic charges, standing alone, does not establish that a customer purchased a commercial sex act. However, a recurring pattern in which the same customer or payment card is charged twice in close temporal proximity during a single apparent visit can be significant when considered together with other evidence that commercial sex is being offered at the business. This is particularly significant when the initial transaction is consistent with the amount charged for the massage or door fee and is followed by a separate transaction consistent with an additional payment made during or at the conclusion of the same visit.

c. During this investigation, investigators identified this pattern in financial records associated with WW and ZZX's massage parlors. Specifically, investigators

identified repeated instances in which two electronic transactions associated with the same customer or payment card were processed in close temporal proximity. Significantly, these transactions were processed through merchant accounts associated with WW and ZZX's parlors and ultimately credited to business checking accounts controlled by WW and ZZX. Thus, the financial records reflect not only a recurring pattern of multiple payments during apparent individual customer visits, but also that the proceeds from those transactions were processed through the parlors' merchant accounts and deposited into accounts controlled by WW and ZZX.

d. When considered together with the other evidence described in this affidavit indicating that commercial sex was being offered at WW and ZZX's parlors, I believe this recurring transaction pattern is consistent with customers making an initial payment for the massage or door fee followed by a separate payment associated with additional services, including commercial sex acts. In the paragraphs that follow, I describe several examples of this pattern identified in the financial and merchant processing records associated with WW and ZZX's parlors.

   i. East Lansing Massage LLC, dba Asian Massage
   Merchant Account Number 565500001087820
   Opened: 10/14/2025
   Opened By: ZZX
   Linked Bank Account for Proceeds: MSU Federal Credit Union 139228180

   Specific examples showing the same the payment card was charged twice on the same date are illustrated below.

Date	Customer Card #	Amount
12/10/2025	373915xxxxx3003	$72.10
12/10/2025	373915xxxxx3003	$144.20
01/18/2026	370382xxxxx6102	$144.20
01/18/2026	370382xxxxx6102	$61.80
04/07/2026	341162xxxxx1003	$144.20
04/07/2026	341162xxxxx1003	$51.50

ii. Flint Asian Massage LLC, dba Flint Asian Massage
Merchant Account Number 56500000778320
Opened: 11/03/2023
Opened By: ZZX
Linked Account for Deposit of Proceeds:
Huntington National Bank 01153526715 (at opening)
MSU Federal Credit Union 13928983 (beginning 09/28/2025)

Specific examples showing the same the payment card was charged twice on the same date are illustrated below.

Date	Customer Card #	Amount
01/25/2024	400177xxxxxx7562	$73.00
01/25/2024	400177xxxxxx7562	$33.00
01/25/2024	400177xxxxxx7562	$63.00
10/06/2024	372327xxxxx2009	$103.00
10/06/2024	372327xxxxx2009	$73.00
04/21/2026	432359xxxxxx2793	$103.00

04/21/2026	432359xxxxxx2793	$203.00

iii. Asia Spa Massage, LLC, dba Asia Spa Massage
Merchant Account Number: 565500000775169
Opened: 10/26/2023
Opened By: WW
Linked Account for Deposit of Proceeds:
Huntington National Bank, 1153681236 (at opening)
Independent Bank 29205504487 (beginning 09/29/2025)

Specific examples showing the same the payment card was charged twice on the same date are illustrated below.

Date	**Customer Card #**	**Amount**
11/03/2024	414720xxxxxx7819	$63.00
11/03/2024	414720xxxxxx7819	$120.00
09/02/2025	377986xxxxx1008	$53.00
09/02/2025	377986xxxxx1008	$143.00
05/22/2026	542432xxxxxx7629	$5.00
05/22/2026	542432xxxxxx7629	$140.00

30. The use of merchant processing accounts enabled WW and ZZX to accept and settle electronic customer payments at their parlors. Considering the recurring double charges, coupled with evidence gathered from the undercover operation, law enforcement reports, and online reviews, I believe WW and ZZX used their parlor business bank accounts to received proceeds of commercial sex. WW and ZZX used facilities of interstate commerce, namely merchant payment systems and banks, to

promote, manage, carry on, facilitate, and distribute the proceeds of, their massage parlors which offer illegal commercial sexual services.

Wenhan Wang and ZhenZhen Xiao Operate the Three Parlors Described Above

31. In the paragraphs that follow, I will describe evidence that indicates WW and ZZX operate each of the parlors discussed above. This evidence includes surveillance and other investigative activity demonstrating WW and ZZX's involvement in the day-to-day operation of the parlors.

Business Registration Information

32. Michigan Licensing and Regulatory Affairs (LARA) list WW and ZZX as the registered agents of East Lansing Massage, LLC, Flint Asian Massage, and Asia Spa Massage (amongst others).

Name	Filing Date	Status	AR Standing	Entity Type	Entity ID#	Agent	AR Due Date
ASIA SPA LLC	12/18/2017	Dissolved - Certificate of Dissolution	Good	Domestic Limited Liability Company	802142624	WENHAN WANG	N/A
ASIA SPA MASSAGE LLC	08/22/2023	Active	Good	Domestic Limited Liability Company	803087984	WENHAN WANG	02/15/2027

Name	Filing Date	Status	AR Standing	Entity Type	Entity ID#	Agent	AR Due Date
EAST LANSING MASSAGE LLC	01/08/2020	Active	Good	Domestic Limited Liability Company	802400628	ZHENZHEN XIAO	02/15/2027
FLINT ASIAN MASSAGE LLC	01/14/2020	Active	Good	Domestic Limited Liability Company	802400632	ZHENZHEN XIAO	02/15/2027
MICHIGAN MASSAGE LLC	10/15/2019	Active	Good	Domestic Limited Liability Company	802373995	ZHENZHEN XIAO	02/15/2026
SOUTH LYON MASSAGE LLC	08/26/2019	Dissolved - Certificate of Dissolution	Good	Domestic Limited Liability Company	802356817	ZHENZHEN XIAO	N/A

33. According to LARA, ZZX is the registered agent of East Lansing Massage, LLC. Business filings and financial records indicate ZZX operates at least two massage parlors under the corporate name East Lansing Massage, LLC. 1.) East Lansing Massage, located at 780 W. Lake Lansing Rd, Suite 400, East Lansing, MI. and 2.) Asian Massage, located at 4201 S. Pennsylvania (one of the locations this continuation is requesting authority to search).

    a. According to LARA, the address of the massage parlor operating as East Lansing Massage, 780 West Lake Lansing Road, Suite 400, East Lansing, MI, is the registered business address of East Lansing Massage LLC.

    b. According to LARA, the address of the parlor operating as Asian Massage, 4201 S. Pennsylvania Avenue, Lansing, MI, was the previous registered business address of East Lansing Massage, LLC. and appears in various business filings for East Lansing Massage, LLC, such as annual statements. The same address was previously listed as the business address of Asia Spa Massage LLC, until its dissolution in 2021. Asia Spa Massage, LLC. was owned by ZZX's spouse, WW.

34. According to LARA, WW is the registered agent of Asia Spa Massage, LLC. The registered business address of Asia Spa Massage, LLC is 690 Netherfield St., NW, Comstock Park, MI, the location of the parlor operating as Asia Spa Massage.

35. According to LARA, ZZX is the registered agent of Flint Asian Massage, LLC. The registered business address of Flint Asian Massage, LLC is 4483 Lennon Rd., Flint, MI, the location of the parlor operating as Flint Asian Massage.

36. According to LARA records, the parlors described above were registered with the State of Michigan on the following dates:

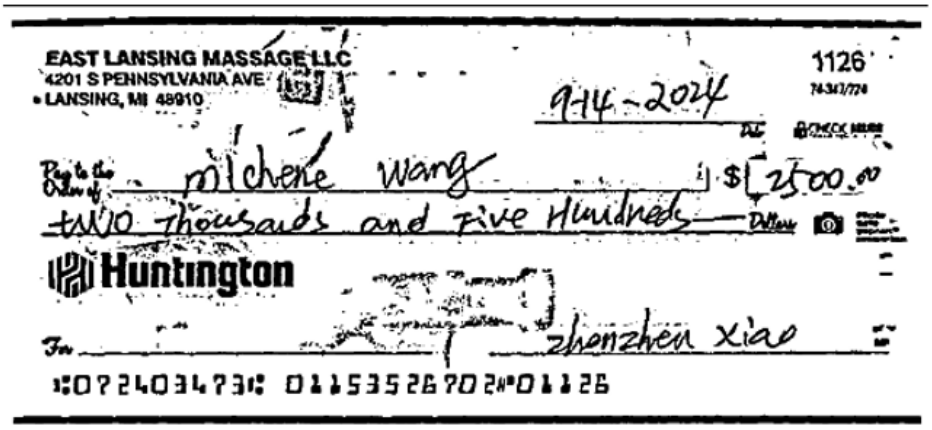
Asian Massage (penn)	1-8-20
Flint Asian Massage	1-14-20
Asia Spa Massage	8-22-23

Financial Information

37. Financial records indicate WW and ZZX control proceeds from the massage parlors.

a. East Lansing Massage, LLC. holds a business bank account at Michigan State University Federal Credit Union (MSUFCU) and previously held a business bank account with Huntington National Bank. ZZX is and was the sole authorized signer on both accounts. ZZX has issued checks from both accounts to other parlor operators, including Michelle Wang,[11] as shown below.

[11] On June 30, 2017, during a Kent County Sheriff's investigation, law enforcement conducted a vehicle stop of Michelle Wang and reported she was with her nephew Wenhan Wang, indicating that Michelle Wang is Wenhan Wang's Aunt.


EAST LANSING MASSAGE LLC
4201 S PENNSYLVANIA AVE
LANSING, MI 48910

1126

9-14-2024

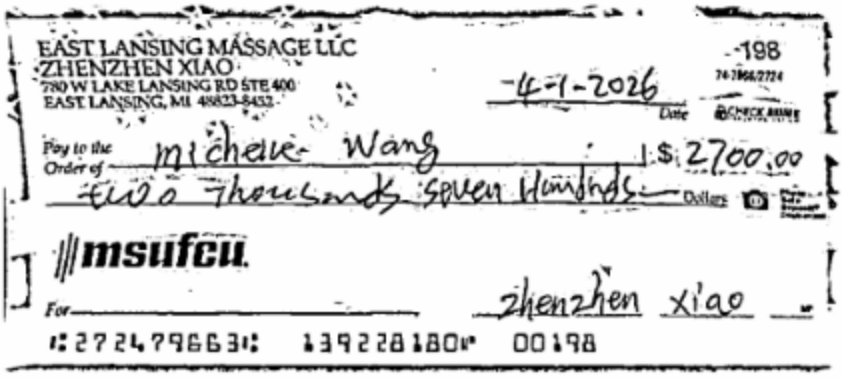
Pay to the Order of michele Wang $ 2500.00

two Thousands and Five Hundreds Dollars

Huntington

For zhenzhen xiao

⑆072403473⑆ 011535267024 01126


EAST LANSING MASSAGE LLC
ZHENZHEN XIAO
780 W LAKE LANSING RD STE 400
EAST LANSING, MI 48823-8432

198

4-1-2026

Pay to the Order of michele Wang $ 2700.00

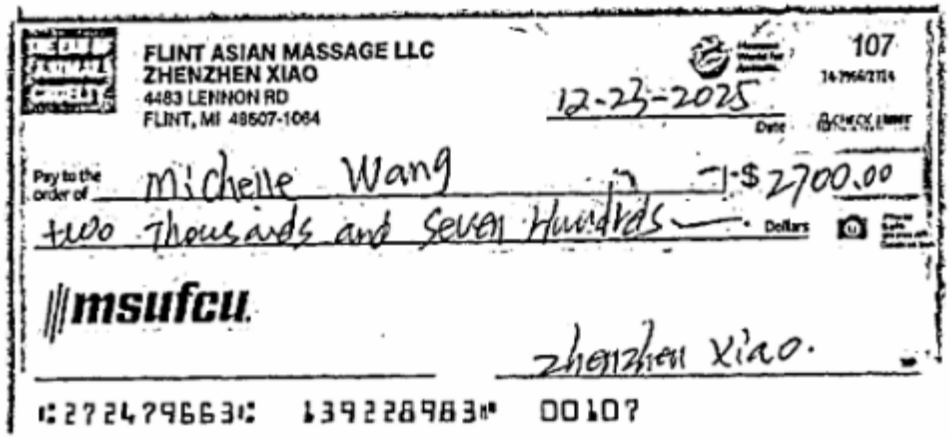
Two Thousands Seven Hundreds Dollars

msufcu

For zhenzhen xiao

⑆272479663⑆ 139228180 00198

b. ZZX established business accounts for Flint Asian Massage, LLC. at Huntington National Bank and later at MSUFCU. ZZX was the sole authorized signer on both accounts. ZZX has issued checks from the accounts to another massage parlor operator, Michelle Wang, and to a limited liability company operated by Michelle Wang, Wang's Company, LLC., as shown below:



FLINT ASIAN MASSAGE LLC
ZHENZHEN XIAO
4483 LENNON RD
FLINT, MI 48507-1064

107

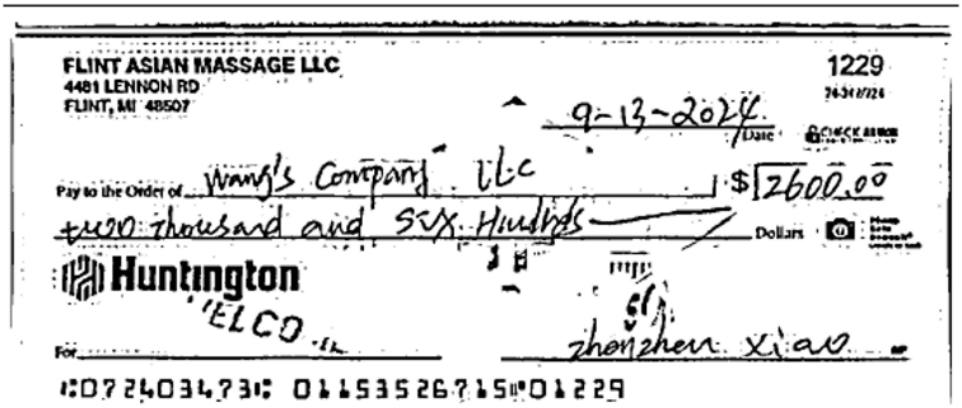
12-23-2025
Date

Pay to the order of Michelle Wang $2700.00
two Thousands and Seven Hundreds Dollars

msufcu

zhenzhen xiao.

⑆272479663⑆ 139228983⑈ 00107



FLINT ASIAN MASSAGE LLC
4481 LENNON RD
FLINT, MI 48507

1229

9-13-2024
Date

Pay to the Order of Wang's Company LLC $2600.00
two thousand and SIX Hundreds Dollars

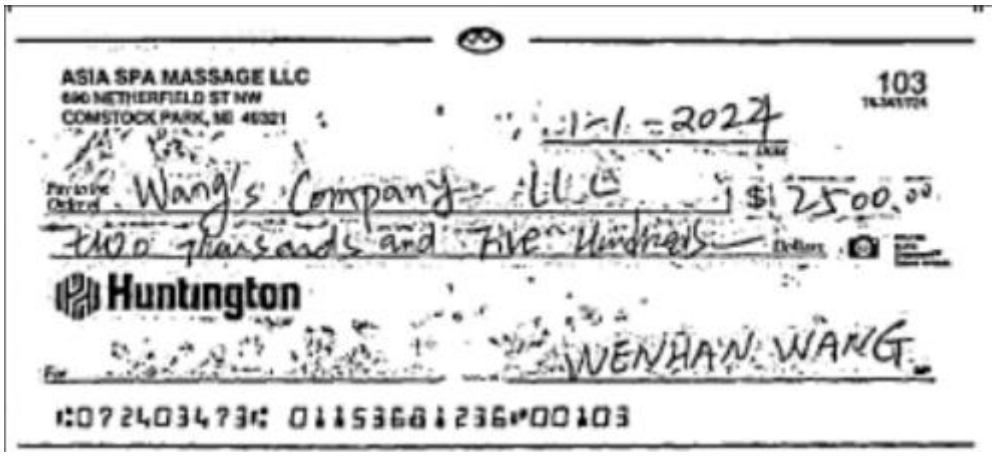
Huntington

For ELCO

zhenzhen xiao

⑆072403473⑆ 011535267⑆01229

c. WW established business accounts for Asia Spa Massage, LLC. at Huntington National Bank and later at Independent Bank. WW was the sole authorized signer on both accounts. WW has issued checks from the accounts to himself, Michelle Wang, and Wang's Company, LLC., amongst others, as shown below:



ASIA SPA MASSAGE LLC
690 NETHERFIELD ST NW
COMSTOCK PARK, MI 49321

103

1-1-2024

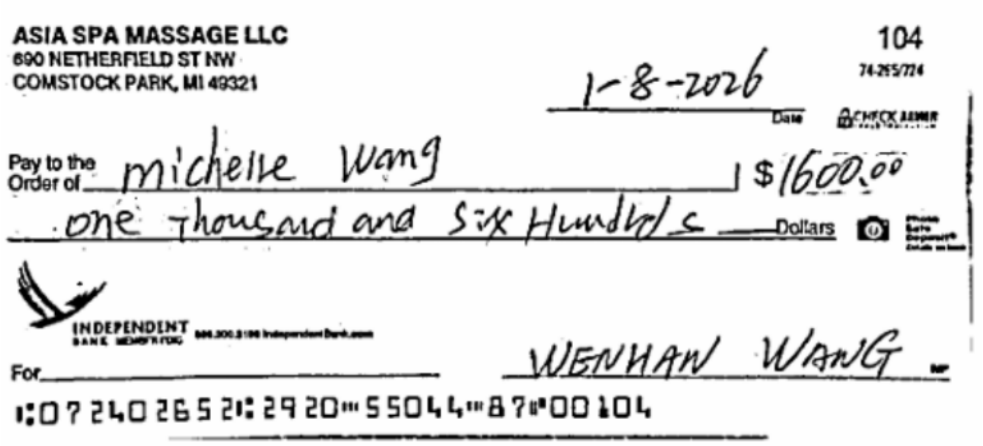
Pay to the Order of Wang's Company LLC $ 2500.00

two thousand and five Hundreds Dollars

Huntington

For WENHAN WANG

⑆072403473⑆ 011536812360 00103



ASIA SPA MASSAGE LLC
690 NETHERFIELD ST NW
COMSTOCK PARK, MI 49321

104

1-8-2026

Pay to the Order of michelle Wang $ 1600.00

one Thousand and Six Hundreds Dollars

INDEPENDENT BANK

For WENHAN WANG

⑆072402652⑆ 2920 55044 87 00104

38. Based on the above, I believe the examples demonstrate WW and ZZX exercise control over the receipt and disposition of funds generated through the parlors. WW and ZZX are authorized signers, and direct funds from the accounts through checks issued to WW personally, Michelle Wang, Wang's Company, LLC, and others. Accordingly, the financial records establish a direct financial connection between revenue generated at the parlors, including proceeds associated with commercial sex, and demonstrate WW and ZZX's role in controlling and distributing funds generated through the businesses.

39. Financial records from various sources, identified below, show WW purchased 690 Netherfield St, Comstock Park, MI, the operating location of Asia Spa Massage, in 2018 for $167,715.26:

Deposit Date	**Amount**	**Payor**	**Type**
02/07/2018	$1,000	Wenhan Wang	MoneyGram
02/22/2018	$141,715.26	Wenhan Wang	Cashier's Check
02/22/2018	$20,000	Tony Kimball	Cashier's Check
02/22/2018	$4,000	Wenhan Wang	8 Meijer Money Orders - $500 each
02/22/2018	$1,000	Wenhan Wang	MoneyGram
Total	**$167,715.26**		

WW and ZZX Travel to the Parlors

40. WW and ZZX have traveled to the massage parlors they operate on multiple occasions. The circumstances of their travel indicate operational influence over the parlors. The following events were observed:

a. *March 7, 2026*

i. While reviewing surveillance video, investigators observed the Dodge Ram registered to WW arrive at Asia Spa Massage. WW exited the vehicle, opened the rear tailgate, and carried three cases of water into the massage parlor (shown below).



ii. Investigators also observed the Dodge Ram arrive at Asia Spa Massage. WW, exited the vehicle and accessed the rear passenger area (shown below, left) retrieving a plastic white grocery-type bag, which he carried into the massage parlor. WW then returned to the Dodge Ram and accessed the rear passenger side and retrieved more supplies (shown below, right). WW returned to the Dodge Ram three times and appeared to retrieve cases of bottled water from the rear truck bed (show below, bottom). WW carried the supplies into the massage parlor before departing.







b. *March 17, 2026*

i. While reviewing surveillance video, investigators observed the Dodge Ram arrive at Asia Spa Massage at approximately 9:41 PM. WW accessed the rear truck bed of the vehicle, retrieved a large item, and carried it into the massage parlor (shown below).



c. *April 4, 2026*

i. Investigators observed on surveillance video the Dodge Ram arrive at Asia Spa Massage. WW exited the vehicle, retrieved mail, and entered the massage parlor (shown below). A short time later, WW exited the massage parlor and departed.



d. *September 9, 2026*

i. Video surveillance observed a dark color BMW arrive at Flint Asian Massage at approximately 9:33 AM.

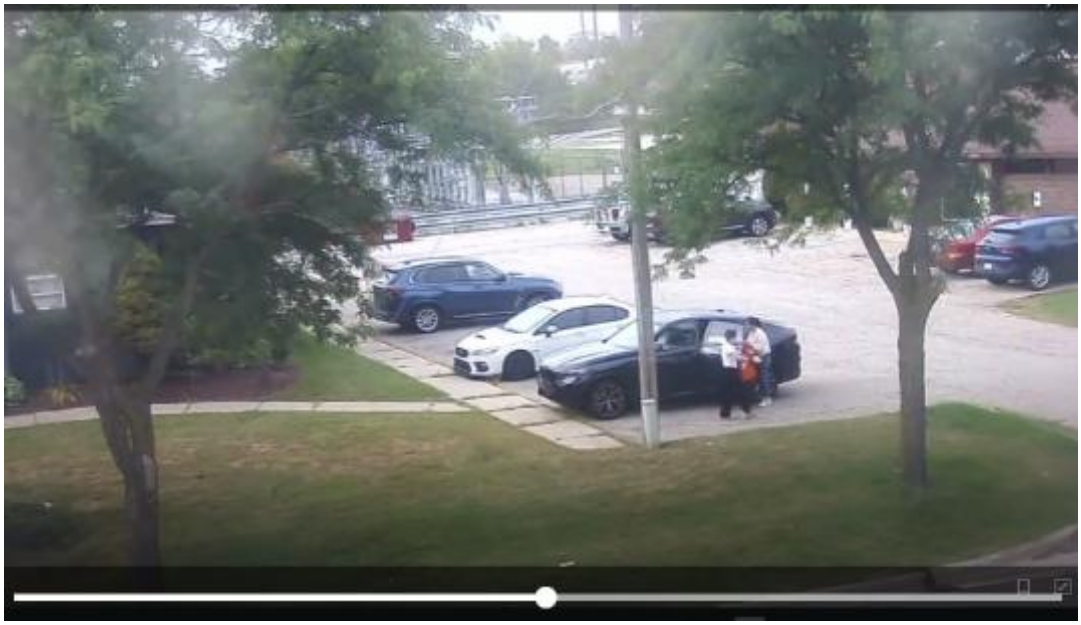


1. Although the license plate of the dark colored BMW could not be seen, the dark colored BMW appeared to match the BMW registered to Cherry Valle Lane, bearing license plate AD0NIAW, one of the vehicles this search warrant is seeking authority to search. A license plate reader, located on Lennon Road near Flint Asian Massage, also

documented the BMW on the same day in Flint at approximately 9:32 AM, 1 minute before the BMW arrived at the massage parlor (shown below).



ii. An Asian female exited the back passenger seat with belongings (shown below). The driver, also an Asian female, opened the trunk of the BMW and then both females entered the massage parlor.



iii. The same Asian female from the back passenger seat of the BMW then exited the massage parlor and retrieved several grocery style bags from the trunk of the BMW (shown below) and carried those bags into the massage parlor.



e. *September 28, 2026*

i. Physical surveillance was conducted at Cherry Valle Lane. At approximately 10:40 AM, the BMW was observed departing the vicinity of the residence.

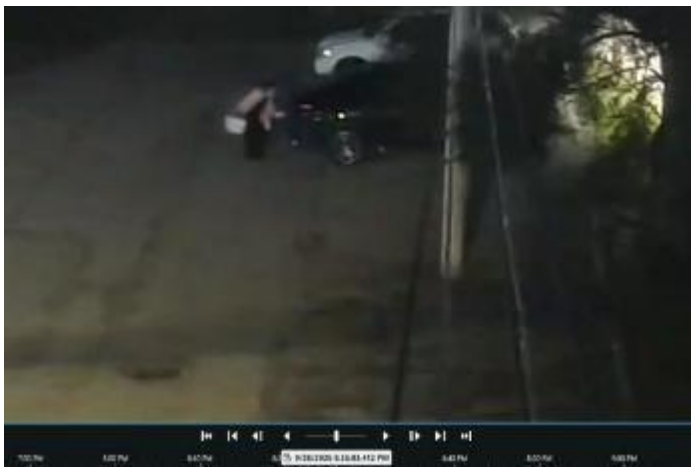
ZZX was confirmed as the driver through observation by surveillance personnel. The BMW stopped at a gas station before traveling to Asian Massage (Penn), arriving at approximately 11:10 AM. ZZX entered the massage parlor with a bag/purse.



ii. At approximately 1:24 PM, WW was observed on surveillance video walking from the Dodge Ram and entering the parlor.



iii. WW departed the massage parlor at approximately 1:32 PM and traveled back to Cherry Valle Lane. Physical surveillance observed WW park the Dodge Ram in the garage. ZZX departed the massage parlor in the BMW at approximately 8:26 PM, carrying a large white bag or basket (shown below).



f. *October 1, 2026*

i. Physical surveillance observed ZZX depart Cherry Valle Lane in the BMW and drive directly to Flint Asian Massage. ZZX entered the massage parlor with multiple bags (shown below).



ii. Around 3:00 PM, ZZX and an unidentified worker exited the massage parlor. The unidentified worker carried a white bag to the dumpster with ZZX.



iii. Approximately 10 minutes later, they both returned to the parlor without the white bag.



iv. At approximately 9:15 PM, ZZX exited the parlor with a purse and a plastic tote, placed items into the trunk of the BMW. Physical surveillance observed ZZX drive a direct route back to Cherry Valle Lane, arriving around 10:00 PM.



g. *October 2, 2026*

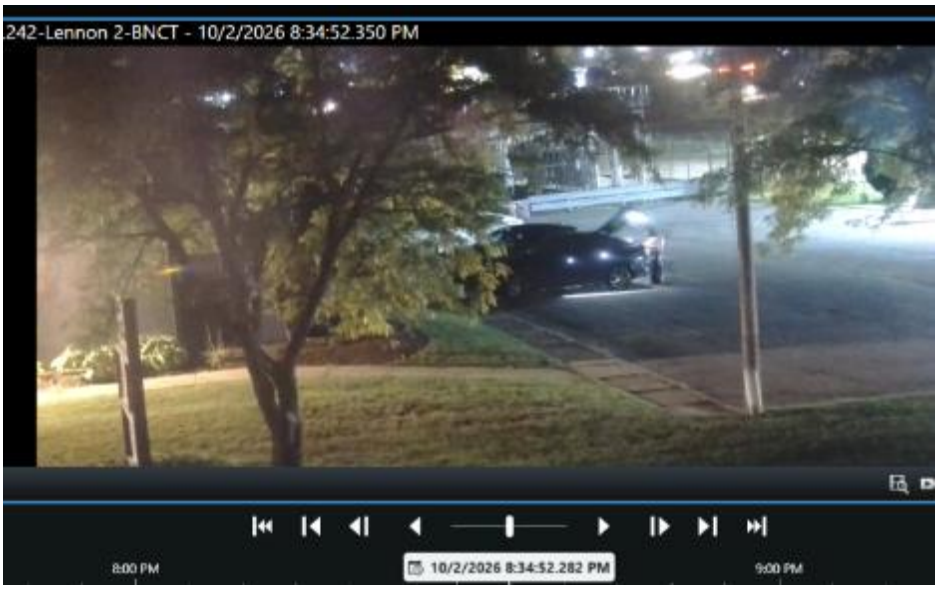
i. Physical surveillance observed ZZX depart Cherry Valle Lane and drive directly to Flint Asian Massage. ZZX waited in the BMW until an unidentified worker approached the driver's door. ZZX and the unidentified worker appeared to exchange something that could not be identified by surveillance video.



ii. The unidentified worker and ZZX both walked to the trunk of the BMW. The unidentified worker retrieved bags from the trunk (shown below) and they both walked into the parlor.



iii. At approximately 8:34 PM, ZZX and an unidentified worker exited the massage parlor. The unidentified worker carried a large bag and placed it into the trunk of the BMW.



iv. Both walked to the area of the dumpster before returning to the BMW. ZZX entered the driver's seat and departed. The unidentified worker returned to the parlor.

41. The observed conduct, including the transportation of an individual with personal belongings, WW collecting mail, and WW and ZZX conducting deliveries of additional items to the businesses, is consistent with patterns identified elsewhere in this investigation involving the movement of workers and operational control over the massage parlors.

42. Taken with financial records, to include the merchant account records, these observations support my belief that WW and ZZX did not merely have passive interests in the businesses. Rather, they exercise continued operational control over the parlors. It also provides probable cause to believe records related to the operations of the parlors will be maintained at the businesses, within the vehicles, on WW and ZZX's devices, on their persons, and in their residence.

A Money Remitter Collects Cash from Massage Parlors

Identification of Chengxia Snelson and Money Collection Activity

43. Since November of 2024, the FBI has been investigating a woman named Chengxia Snelson (CS). CS is a Michigan resident who works as a money remitter for massage parlor workers. Through audio and video surveillance, as well as direct observation, investigators have observed CS engaging in money pickups throughout Michigan. Since March of 2025, investigators have observed CS visit over 90 massage parlors in the Western District of Michigan, Eastern District of Michigan, Ohio, Indiana, and Illinois.

44. CS's money pickup trips usually follow the same pattern: she arrives at or near a massage parlor, then individual owners or workers approach CS's vehicle carrying plastic bags or envelopes that contain U.S. currency. The owners or workers then get inside CS's vehicle, hand over the money, and give CS directions about how to distribute the cash. After providing instructions, the owners or workers get out of CS's vehicle and return to the parlor. CS counts and organizes the money, sometimes placing it in yellow envelopes, then travels in her vehicle using the interstate and US Highway systems to distribute the proceeds to various financial institutions, converts the cash to money orders, or hands bulk cash off to other individuals. The following are examples:

a. *May 22, 2025*

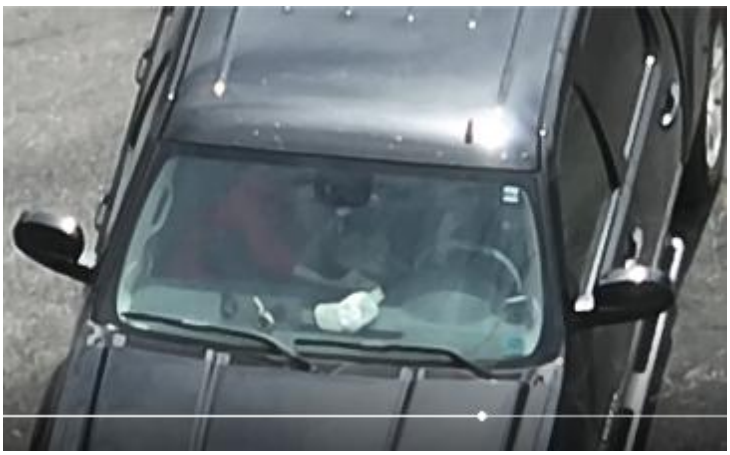
i. While monitoring the GPS data provided by Verizon for CS's cell phone, it was determined the cell phone was located in Grand Rapids near Kalamazoo Avenue and 44th street. Using the GPS location information, physical surveillance located CS parked in front of a massage parlor, Asian Ivy Massage, located at 4242 Kalamazoo Ave., SE, Grand Rapids, MI ("Asian Ivy Massage"). CS was sitting in the driver's seat of her vehicle. CS departed Asian Ivy Massage at approximately 10:42 AM and law enforcement followed CS via interstate highway towards Grand Haven, MI.

ii. At approximately 11:35 AM, CS's vehicle was observed by physical surveillance located at An Essential Massage, located at 601 S. Beacon Blvd.,

Grand Haven, MI ("An Essential Massage"). CS parked her vehicle near the back of the business.

iii. Physical and video surveillance observed an Asian female, believed to be Wangchun Zhang, seated in the passenger seat of CS's vehicle. Video surveillance captured the interaction in which it appeared U.S. currency was exchanged (shown below).

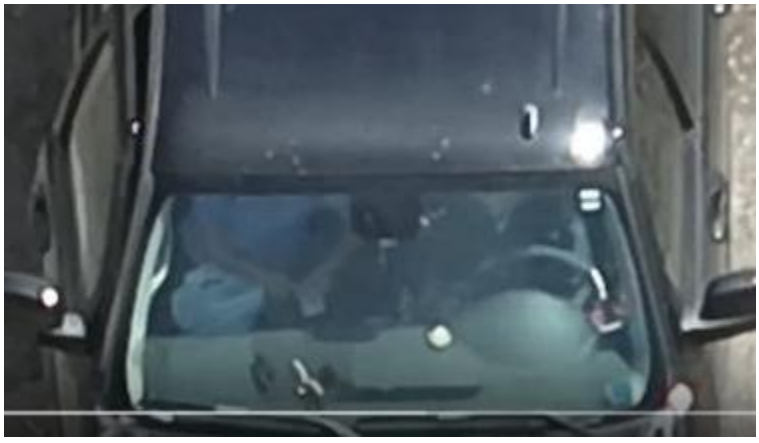




iv. On the same day, CS's vehicle traveled to Asian Health Massage, located at 321 Beechtree Street, Grand Haven, MI (Asian Health Massage). Physical surveillance confirmed upon arrival, CS was the only occupant of her vehicle. An unknown Asian female exited the business and entered the passenger side of CS's vehicle. The unknown Asian female was carrying a white plastic

grocery shopping type bag. Video surveillance captured the interaction, and it appeared the unknown Asian female removed US currency, counted the money, and handed it to CS.





v. The massage parlors CS visited on May 22, 2025, including Asian Ivy Massage, An Essential Massage, and Asian Health Massage, were each subject of undercover operations during the investigation, further detailed below. As described during CS's visits to these locations, she was observed collecting cash from a massage parlor owner and workers.

vi. On July 22, 2025, An Essential Massage was subject to a law enforcement undercover operation in which an undercover officer entered the parlor and paid for a 30-minute massage. During the massage, the Asian female parlor

worker asked the undercover to turn face up, placed his own hand on his genitals, and made a hand gesture with her hand that the undercover recognized suggested masturbation of his penis and asked for $60 additional. The undercover declined the sexual solicitation and exited the parlor.

vii. On July 23, 2025, Asian Ivy Massage was subject to a law enforcement undercover operation in which an undercover officer entered the parlor and paid for a 30-minute massage. During the massage, the Asian female parlor worker stood straddling the undercover's right hand in close proximity to her vagina. The undercover noted he could feel her inner thighs next to both sides of his head while she massaged his back. After turning face up, the worker asked the undercover, "Finish?" and made a gesture with her hand that the undercover recognized suggested masturbation of his penis. The undercover asked how much it would cost, and she said, "It's offered to you." The undercover declined the sexual solicitation and exited the parlor.

viii. On July 24, 2025, Asian Health Massage was subject to a law enforcement undercover operation in which an undercover officer entered the parlor and paid for a 30-minute massage. During the massage, the Asian female massage parlor worker massaged his back before she then patted the undercover's penis with her hand and made a hand gesture that the undercover recognized suggested masturbation of his penis. The worker then asked for $40 additional to the fee already paid. The undercover declined the sexual solicitation and exited the parlor.

b. *January 18, 2026*

i. CS was observed on surveillance video entering her vehicle. GPS information for her vehicle indicated CS traveled to the area of White Rose Asian Spa located at 5230 Westerville Rd., Columbus, OH (White Rose). Video surveillance[12] captured an unknown Asian female providing cash to CS (shown below).





A Parlor Worker Identifies CS as a "Money Launderer."

45. In February 2026, the FBI participated in a multi-massage parlor state search warrant operation involving an Asian female who operated three massage parlors. One of the massage parlors, Heaven on Earth, located in Ann Arbor, MI, was searched. During the search, investigators spoke to Asian female employees of the business. One of the Asian female employees, "WITNESS A," advised she came to the United States

[12] Investigators obtained the photo from a camera that was authorized by court order in 1:25-MJ-137.

around October 2025. Eventually, WITNESS A began working at Heaven on Earth, where she performed sexual services for customers.

46. WITNESS A described her work at Heaven on Earth. She was expected to perform massage services at a rate of $50 for 30 minutes or $70 for 60 minutes. WITNESS A also learned she would have to provide "extras," which entailed sexual services. As WITNESS A detailed, she was paid $100 for a hand job, $150 for oral sex, and $300 for sexual penetration. WITNESS A discussed these "extras" with her boss. WITNESS A only received the proceeds from the "extras" and not from the massage services, which went to the owner of Heaven on Earth. The owner also collected 40% of the funds collected for sexual penetration. If WITNESS A performed a massage with sexual penetration and did not inform the owner, she would be fined $5,000. At the end of each week, the boss would come to the massage parlor and settle the accounts. The workers kept records of the customers and what services were performed.

47. WITNESS A provided information regarding a person she referred to as a "money launderer," hereafter referred to as "money launderer." After WITNESS A settled with her boss at the end of the week, the remaining money would go to her family, specifically her parents and children in China. WITNESS A would wire the cash over to China through the "money launderer." WITNESS A knew the "money launderer" helped wire money to China for many people. WITNESS A explained other people who worked in the same profession would find someone to help them wire money to China because a normal method would not work. WITNESS A had to be introduced to the "money launderer," because the "money launderer" would not work with

strangers. WITNESS A was confident the earnings she gave the "money launderer" made it to her family in China. WITNESS A confirmed she was in contact with her family and she knew the money made it to her family. WITNESS A stated that the "money launderer" has been engaging in this activity in the area for a long time, and WITNESS A was confident the "money launderer" knew what she was doing.

48. According to WITNESS A, the "money launderer" converted her cash to Chinese RMB, but she did not know how. WITNESS A communicated with the "money launderer" over WeChat. The "money launderer" would reach out to WITNESS A and inquire about how much money WITNESS A, and others, had to collect and would stop at the massage parlor to collect. The "money launderer" would send a message to WITNESS A through WeChat, which is how WITNESS A knew the "money launderer" was coming. WITNESS A's colleagues used the "money launderer" to transfer and wire money as well. WITNESS A stated the "money launderer" had her own way of keeping everyone's money straight. The "money launderer" collected from WITNESS A and many others all over, even in Detroit. WITNESS A stated every time the "money launderer" collected, she instructed them to delete all the messages. WITNESS A advised the "money launderer" would collect 3.5% from every USD 10,000.

49. WITNESS A stated the "money launderer" knew WITNESS A provided "extras," which is a term WITNESS A used to refer to sexual services.

50. I believe that CS is the "money launderer" with whom WITNESS A was meeting. Through electronic and physical surveillance, investigators were able to determine CS

stopped at WITNESS A's parlor on April 22, 2025, June 25, 2025, September 2, 2025, October 2, 2025, October 25, 2025, November 10, 2025, December 26, 2025, and January 6, 2026. In addition, WITNESS A picked CS's picture out of a photo array, saying that the person in CS's picture looked like the "money launderer," who WITNESS A referred to as "the woman," with the reservation that the "the woman" had typically worn glasses when meeting with WITNESS A. As shown above in the description of the January 18, 2026, money pickup, CS is known to wear glasses at times.

CS Visits WW and ZZX's Parlors and the Parlor Workers

51. Throughout the investigation, investigators repeatedly identified CS traveling to massage parlors operated by WW and ZZX. CS's visits were documented through multiple investigative techniques, including GPS location information obtained from three vehicles used by CS, location information associated with CS's cellular telephone, physical surveillance, and video surveillance. Collectively, these investigative techniques identified numerous occasions on which CS traveled to or was present at WW and ZZX's parlors.

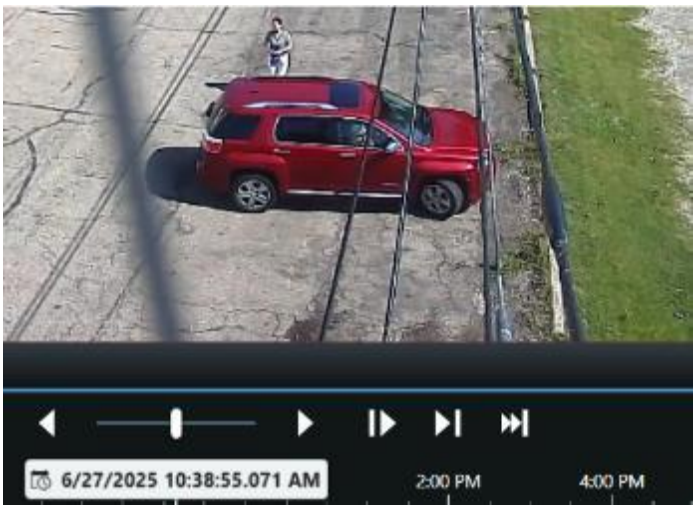
52. Given the frequency of these visits, I have not described every occurrence in this affidavit. Instead, the paragraphs below provide representative examples of CS's visits to WW and ZZX's parlors and the activity observed during or in connection with those visits. These examples are intended to illustrate the recurring nature and circumstances of CS's interactions with WW and ZZX's parlors and their workers.

a. *June 27, 2025*

i. Surveillance video captured CS's vehicle arrive at Asian Massage (Penn) and park in the lot behind the business at approximately 10:11 am. Shortly after, an unknown Asian Female exited Asian Massage (Penn) and entered the passenger seat of CS's vehicle (shown below) for approximately five minutes, exited, and returned to the parlor.



ii. A second Asian female also exited Asian Massage (Penn), entered the back driver's side door of CS's vehicle for approximately seven minutes, exited and returned to the business. During the time in the vehicle, video surveillance captured the exchange of U.S. currency.







iii. CS departed Asian Massage (Penn) at approximately 10:48 AM. The cellular location data provided by Verizon for CS's cellular phone was consistent with the travel and activity of CS's vehicle during the same time period.

b. *July 9, 2025*

i. GPS location data provided by Verizon for CS's cellular phone indicated the cellular device was in the area of Asian Massage (Penn) at approximately 9:19 AM. Video surveillance captured CS's vehicle arriving at Asian Massage (Penn) at approximately 9:13 AM, at which time an Asian female entered the passenger seat of CS's vehicle (shown below).



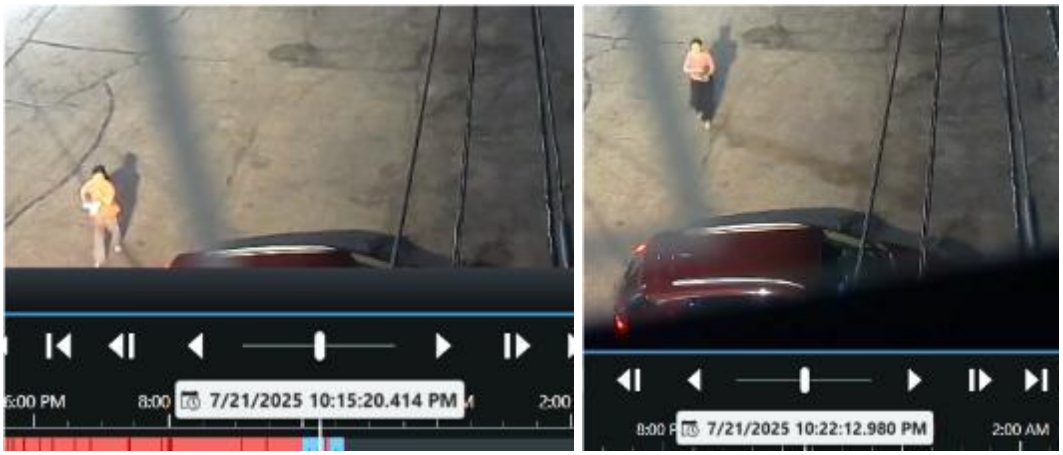
ii. Surveillance video captured what appeared to be the exchange of U.S. currency between the Asian female and CS.



c. *July 21, 2025*

i. GPS information for CS's vehicle indicated the vehicle was in the area of Asian Massage (Penn) from approximately 10:12 PM to 10:29 PM, over an hour after the publicly published hours of the massage parlor, which lists 9:00

AM to 9:00 PM. Two unknown Asian females were observed exiting the massage parlor and entering CS's vehicle one at a time (shown below) and then returning to the massage parlor.



ii. The cellular location data provided by Verizon for CS's cellular phone was consistent with the travel and activity of CS's vehicle during the same time period.

d. *August 4, 2025*

i. GPS information for CS's vehicle indicated the vehicle was in the area of Flint Asian Massage from approximately 1:59 PM to 2:08 PM.



ii. The cellular location data provided by Verizon for CS's cellular phone was consistent with the travel and activity of CS's vehicle during the same time period.

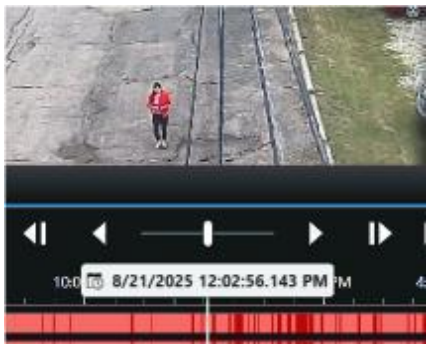
e. *August 21, 2025*

i. GPS location information for CS's vehicle indicated the vehicle was in the area of Asian Massage (Penn) at approximately 11:56 AM. CS's vehicle was observed on surveillance video but repositioned and parked off camera. Surveillance video and physical surveillance units observed three Asian females enter CS's vehicle and then return to the parlor (shown below).













f. *September 8, 2025*

i. GPS information for CS's vehicle indicated CS's vehicle was in the area of Asian Massage (Penn) from approximately 3:24 PM to 3:34 PM. At least one unknown Asian female exited the massage parlor and entered CS's vehicle.

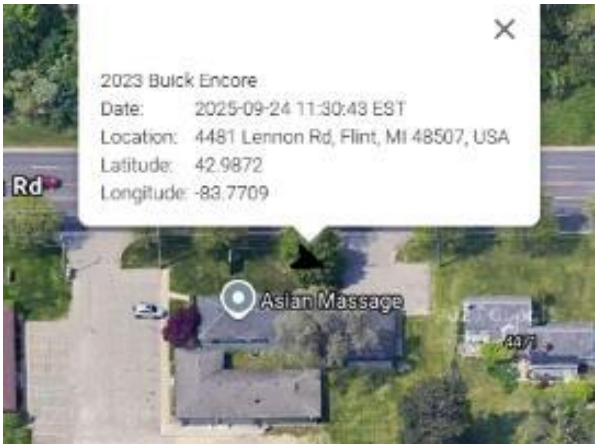


ii. Surveillance video captured CS counting money (shown below). The vehicle was driven by CS's husband, JAMES SNELSON (JS).



g. *September 24, 2025*

i. Physical surveillance and GPS location information for CS's vehicle indicated CS's vehicle was in the area of Flint Asian Massage from approximately 11:30 AM to 11:41 AM.



h. *October 6, 2025*

i. GPS location information for CS's vehicle indicated that the vehicle traveled to the area of Asian Massage (Penn). GPS location data provided by Verizon for CS's cellular phone was consistent with being in the area of Asian Massage (Penn) as well. Video surveillance captured CS's vehicle arriving behind the parlor at approximately 9:45 AM. Three unknown Asian females separately exited the massage parlor, entered CS's vehicle, then returned to the massage parlor. The first unknown Asian female entered the back seat of CS's vehicle at approximately 9:48 AM and placed cash on the center counsel, which CS collected (shown below).



ii. A second unknown Asian female entered the back seat of CS's vehicle at approximately 9:50 AM. The second unknown Asian female handed CS two separate stacks of cash (shown below).








iii. At approximately 9:52 AM, the second unknown Asian female exited CS's vehicle. After organizing the cash, CS appeared to interact with her cellular phone. At approximately 9:53 AM, a third unknown Asian female entered the passenger seat of CS's vehicle, handed a plastic bag to CS, which she opened and removed what appeared to be cash (shown below).





iv. The third unknown Asian female exited CS's vehicle. CS organized the cash before departing (shown below).




i. *October 16, 2025*

i. GPS information for CS's vehicle indicated the vehicle was in the area of Asia Spa Massage from approximately 3:12 PM to 3:17 PM. Surveillance video captured an unknown Asian female exiting the massage parlor and entering CS's vehicle (shown below).




j. *November 11, 2025*

i. CS was observed on surveillance video entering her vehicle. GPS information for CS's vehicle indicated the vehicle traveled to the area of Asia Spa Massage from approximately 2:14 PM to 2:30 PM. Video surveillance captured an unknown Asian female exit the massage parlor and appeared to hand CS a bag through the driver's side door. CS appeared to count cash that was taken out of the bag (shown below).



k. *December 3, 2025*

i. GPS location information for CS's vehicle indicated the vehicle was in the area of Asian Massage (Penn). Surveillance video captured CS's vehicle arriving and parking in the lot behind the massage parlor at approximately 1:55 PM. CS was the passenger and JS was the driver.[13] Two unknown Asian females exited the parlor at separate times.

ii. At approximately 1:56 PM, an unknown Asian female exited the parlor and approached the passenger side of CS's vehicle holding a white bag or envelope (shown below).

[13] JS is CS's husband. Investigators reviewed his driver's license photo and confirmed his identity.

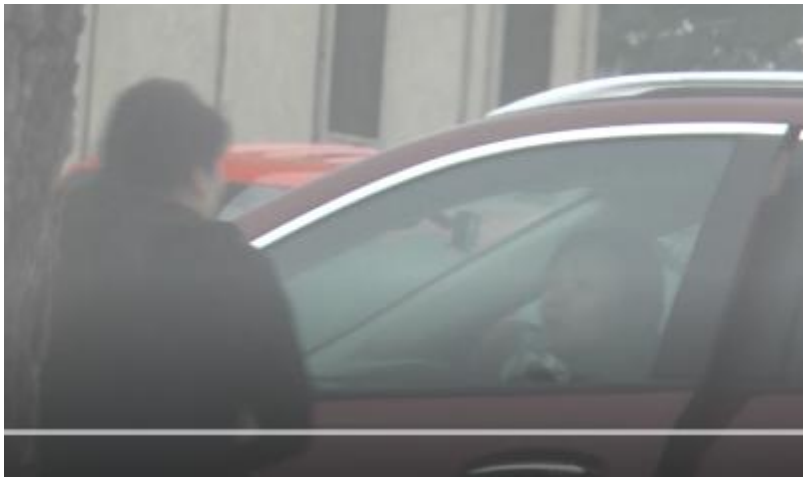


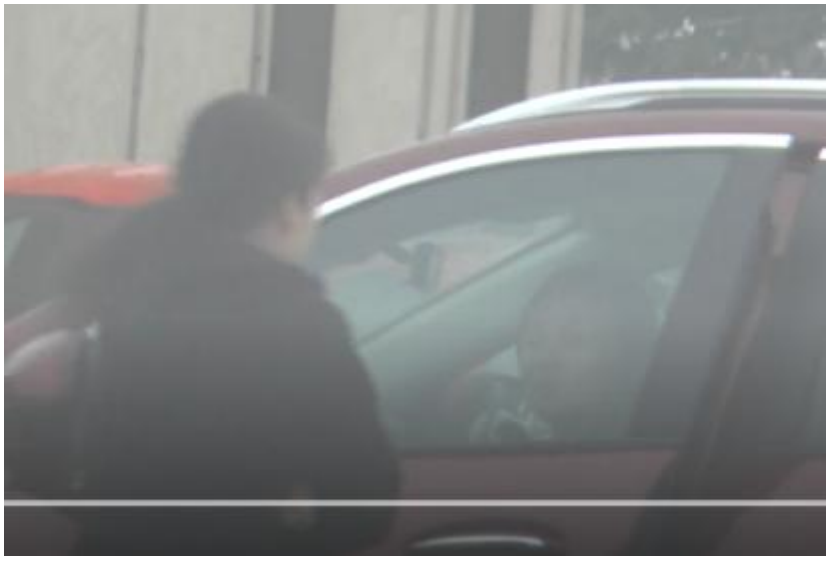
iii. CS opened the passenger door, and the unknown Asian female removed cash from a white bag or envelope and handed it to CS. CS took the cash and closed the passenger door while the unknown Asian female remained outside of the vehicle (shown below).



iv. CS can be seen turning to the unknown Asian female outside of the car, saying something to her, making a motion, and opening the passenger door slightly to speak to her (shown below).[14] Based on my training and experience, as well as the pattern of similar transaction in this investigation, I believe that the conversation within and in the immediate vicinity of CS's vehicle likely concerned cash from commercial sex at Asian Massage (Penn).

[14] The images below are inverted.



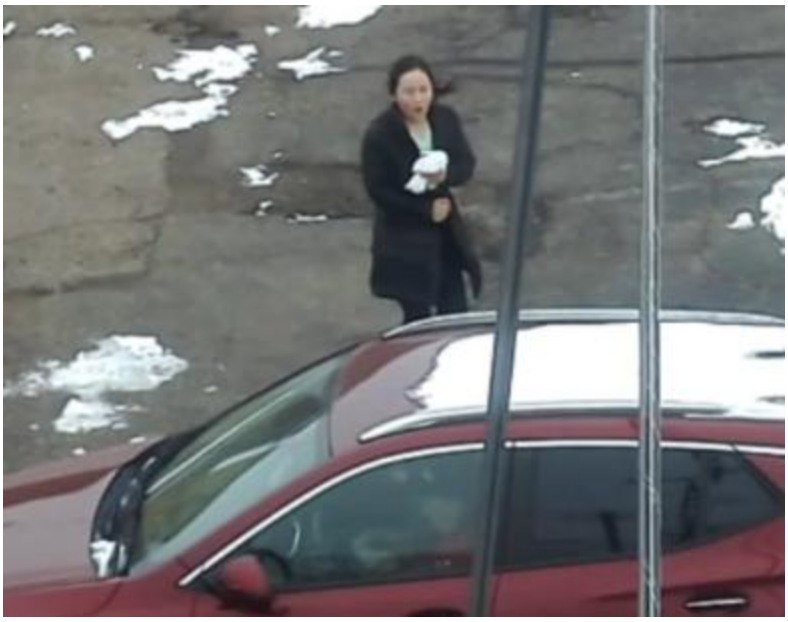


v. The unknown Asian female then immediately entered the back passenger seat of the vehicle. CS can be seen counting the cash.

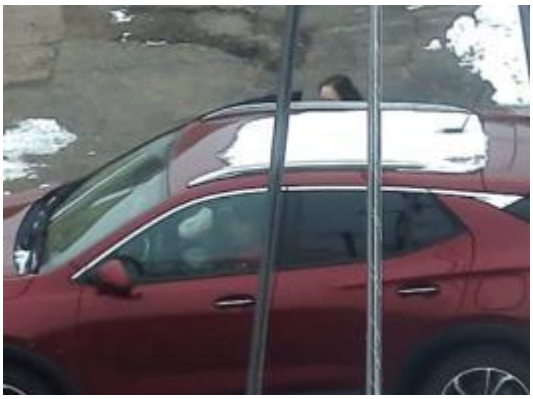
vi. At approximately 1:59 PM, the unknown Asian female exited the vehicle appeared to no longer be carrying anything. CS placed the cash in a large purse.



vii. At approximately 2:07 PM, a second unknown Asian female exited the massage parlor and approached the passenger door of CS's vehicle, carrying a white bag (shown below).



viii. The second unknown Asian female handed the white bag to CS and CS removed the cash (shown below). CS and JS then departed at approximately 2:08 PM.





l. *December 24, 2025*

i. CS was observed on surveillance video entering her vehicle. GPS information for CS's vehicle indicated the vehicle was in the area of Flint Asian Massage from approximately 10:41 AM to 10:53 AM.



ii. The cellular location data provided by AT&T for CS's cellular phone was consistent with the travel and activity of CS's vehicle during the same time period.

m. *December 28, 2025*

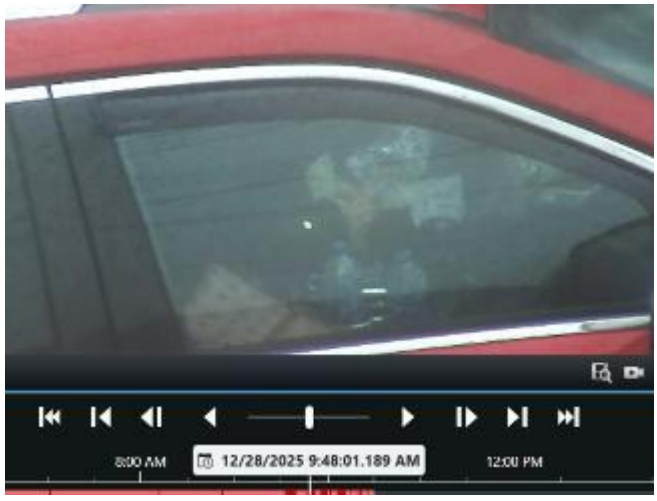
i. GPS information for CS's vehicle indicated the vehicle was in the area of Asian Massage (Penn) from approximately 9:32 AM to 9:56 AM. One unknown Asian female exited the massage parlor and entered CS's vehicle. The unknown Asian female handed cash to CS, which she counted and organized (shown below).





ii. A second unknown Asian female handed cash to CS through the window of CS's vehicle. CS also counted and organized the cash.





n. *June 28, 2026*

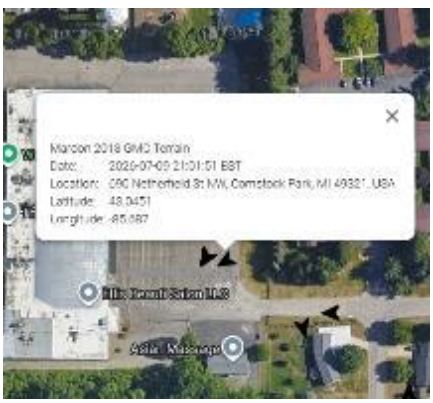
i. CS was observed on surveillance video entering her vehicle. GPS information for her vehicle indicated the vehicle was in the area of Flint Asian Massage from approximately 8:16 AM to 8:41 AM. Two unknown Asian females were observed on surveillance video exiting the massage parlor and entering CS's vehicle one at a time (shown below). Both returned to the massage parlor.



ii. The cellular location data provided by AT&T for CS's cellular phone was consistent with the travel and activity of CS's vehicle during the same time period.

o. *July 9, 2026*

i. CS was observed on surveillance video entering her vehicle. GPS information for CS's vehicle indicated the vehicle traveled to the area of Asia Spa Massage from approximately 9:01 PM to 9:21 PM. Surveillance video captured CS's vehicle parked in a lot near the massage parlor. An unknown Asian female exited the massage parlor with a bag and entered CS's vehicle. The unknown Asian female returned to the massage parlor.



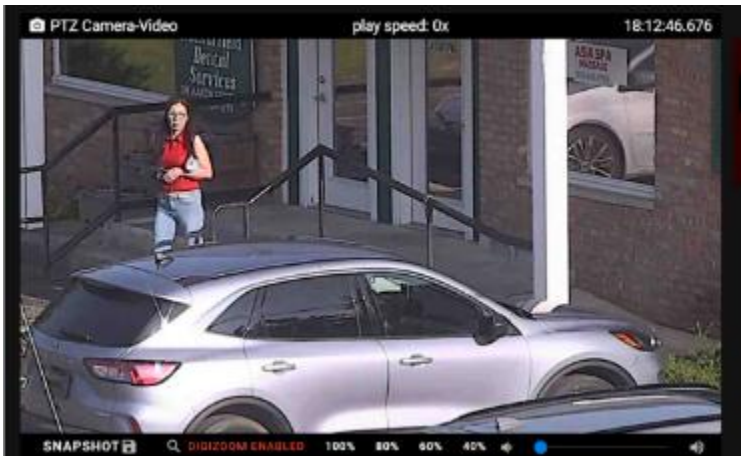


ii. The cellular location data provided by AT&T for CS's cellular phone was consistent with the travel and activity of CS's vehicle during the same time period.

p. *August 20, 2026*

i. CS was observed on surveillance video entering her vehicle. GPS information for her vehicle indicated it traveled to the area of a massage parlor in Grand Rapids from approximately 4:40 PM to 5:23 PM and then Asia Spa Massage in Comstock Park from approximately 6:00 PM to 6:17 PM. CS's vehicle parked near the parlor and an unknown Asian female exited the parlor, briefly entered the vehicle, and returned to the parlor (shown below). Following the interaction, CS's vehicle ultimately returned to CS's residence in Haslett, MI.







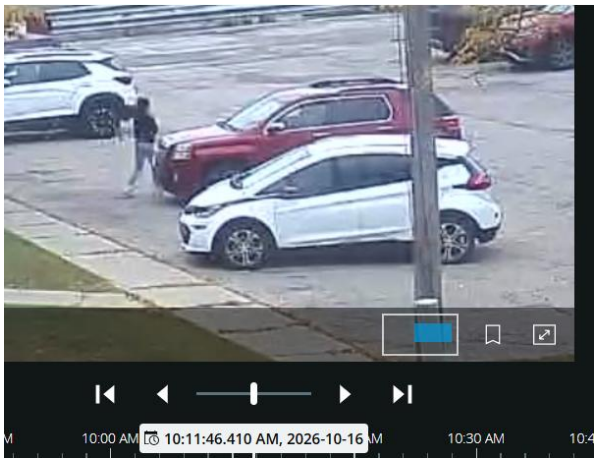
ii. The cellular location data provided by AT&T for CS's cellular phone was consistent with the travel and activity of CS's vehicle during the same time period.

q. *October 16, 2026*

i. Surveillance observed CS entering her vehicle. GPS information for her vehicle indicated it traveled to the area of Flint Asian Massage from approximately 10:10 AM to 10:17 AM. Both surveillance video and physical surveillance observed CS arrive and park in the lot of the massage parlor. An unknown Asian female exited the parlor, concealing a bag under her arm (shown below).



ii. The unknown Asian female approached CS's vehicle and entered the front passenger seat (shown below).



iii. After approximately 4 minutes, the unknown Asian female returned to the parlor, this time, clearly carrying the bag out in the open (shown below).



53. CS's repeated visits to each of the three parlors, the repeated contacts with workers, and the observed transfer and counting of cash at Asian Massage (Penn) and Asia Spa Massage are consistent with the collection of cash proceeds through the same method investigators observed at other illicit massage businesses. Considered with the evidence of WW and ZZX's operational control of these locations and the accounts receiving their electronic proceeds, there is probable cause to believe evidence concerning the source, collection, accounting, instructions, intended recipients, and disposition of the cash will be found at the parlors and on devices used by workers.

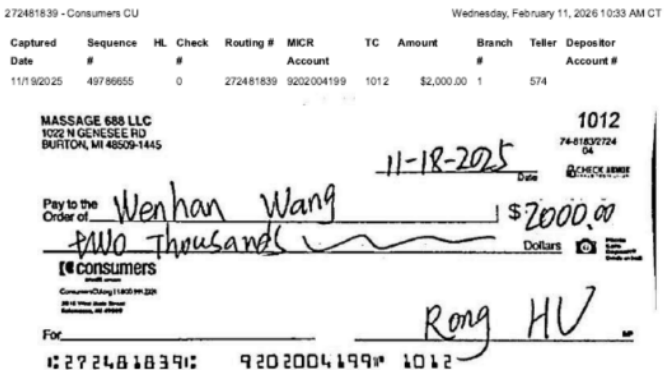
Cherry Valle Lane, the Target Vehicles, and the Persons of WW and ZZX are Utilized in the Operation of the Massage Parlors

Cherry Valle Lane

54. According to Ingham County property records, the residence located on Cherry Valle Lane is owned by WW and ZZX. According to Michigan Secretary of State records, WW and ZZX both indicate Cherry Valle Lane is their residence.

55. Financial records showed WW used Cherry Valle Lane for his personal accounts, including his personal checking account at Consumers Credit Union. WW deposited cash into the same account, as well as checks from parlors owned by others.

a. On November 18, 2025, Rong Hu, through a business account for Massage 688, LLC, wrote a $2,000 check to WW.



272481839 - Consumers CU — Wednesday, February 11, 2026 10:33 AM CT

Captured Date	Sequence #	HL	Check #	Routing #	MICR Account	TC	Amount	Branch #	Teller	Depositor Account #
11/19/2025	49786655		0	272481839	9202004199	1012	$2,000.00	1	574	

MASSAGE 688 LLC
1022 N GENESEE RD
BURTON, MI 48509-1445

1012

11-18-2025 (Date)

Pay to the Order of Wenhan Wang $2000.00

two Thousand Dollars

consumers

For Rong HV

⑆272481839⑆ 9202004199⑈ 1012

b. On October 31, 2025, Yunmai Zhang, through a business account for Asian Massage Mskg, LLC, wrote a $2,000 check to WW.



272481839 - Consumers CU — Wednesday, February 11, 2026 10:36 AM CT

Captured Date	Sequence #	HL	Check #	Routing #	MICR Account	TC	Amount	Branch #	Teller	Depositor Account #
11/19/2025	49786660		0	272485990	47719004475	1029	$2,000.00	1	574	

ASIAN MASSAGE MSKG LLC
PH. 231-260-8148
89 W APPLE AVE
MUSKEGON, MI 49440

74-2958/2724

1029

DATE 10-31-2025

PAY TO THE ORDER OF Wenhan Wang $ 2000.00

two Thousand DOLLARS

HarborLight Credit Union

MEMO

Yunmei zhang

⑆272485990⑆ 477190044750⑈ 1029

56. Financial records also showed ZZX used Cherry Valle Lane on her personal account at MSUFCU. The account was almost entirely funded from checks issued by business accounts from Shiatsu Massage, Flint Asian Massage, and Asian Massage (Penn).

57. On business financial accounts, such as electronic merchant system applications for East Lansing Massage, LLC., ZZX indicates Cherry Valle Lane is her residential address.

58. Surveillance observed the Dodge Ram parked at Cherry Valle Lane.

    a. On October 5, 2026, the Dodge Ram was in the driveway of Cherry Valle Lane at approximately 8:30 AM (shown below).

59. 

Physical surveillance observed WW and ZZX depart from Cherry Valle Lane and travel to their parlors and return to Cherry Valle Lane from their parlors.

    a. On September 28, 2026, surveillance observed ZZX depart Cherry Valle Lane in the BMW and drive to Asian Massage (Penn). The same day, WW was observed at Asian Massage (Penn) before departing in the Dodge Ram and driving to Cherry Valle Lane. On October 1, 2026, surveillance observed ZZX depart Cherry Valle

Lane in the BMW and drive to Flint Asian Massage where she brought multiple bags into the massage parlor. Hours later, ZZX brought a plastic tote out of the massage parlor, placed it in the BMW, and drove back to Cherry Valle Lane. On October 2, 2026, surveillance observed ZZX depart Cherry Valle Lane in the BMW and drive to Flint Asian massage. An unidentified worker and ZZX retrieved bags from the trunk of the BMW and brought them into the massage parlor.

60. Based on my training and experience, operators of cash intensive illicit massage parlors commonly keep records needed to manage the parlors at their residences and on electronic devices kept there. Such records commonly include banking and merchant processing records, checkbooks, tax and entity documents, worker and scheduling information, passwords and authentication devices, communications with workers and financial intermediaries, and records reflecting cash receipts, expenses, and distributions. Individuals who operate numerous locations also commonly use their residence as a centralized place to review accounts, communicate with workers and service providers, retain business mail and records, and store proceeds or documents they do not leave at a business accessible to workers or customers.

61. Considering WW's and ZZX's current occupancy of the residence, their control of the parlors and related accounts, the use of the Dodge Ram and BMW to conduct massage parlor operations, the absence of an identified, separate administrative office, and the travel connecting business activity to the residence, I believe there is probable cause Cherry Valle Lane contains evidence of the target offenses. That evidence may include business, banking, merchant-processing, tax, worker, transportation, remittance, and

ownership records; communications and electronic devices used to operate the parlors or coordinate the collection and disposition of proceeds; evidence identifying persons exercising control; and proceeds or records showing their source, amount, storage, movement, or intended destination.

Target Vehicles

62. Each of the Target Vehicles was used as an instrumentality of the business activity. Examples of this activity are included below.

a. *Dodge Ram* – On March 7, 2026, surveillance observed the Dodge Ram arrive at Asia Spa Massage driven by WW. WW transported multiple cases of water and other supplies into the massage parlor on multiple occasions throughout the day. On March 17, 2026, surveillance observed the Dodge Ram arrive at Asia Spa Massage driven by WW. WW retrieved a large item from the bed of the Dodge Ram and carried it into the massage parlor. On April 4, 2026, surveillance observed the Dodge Ram arrive at Asia Spa Massage driven by WW. WW exited the vehicle, picked up mail for the massage parlor and took it inside. On September 28, 2026, surveillance observed the Dodge Ram parked at Asian Massage (Penn). WW walked from the vehicle into the massage parlor. When he departed, he drove the Dodge Ram to Cherry Valle Lane.

b. *BMW* – On September 9, 2026, surveillance observed the BMW arrive at Flint Asian Massage driven by an Asian female with another Asian female passenger. The passenger exited the vehicle with personal belongings and entered the massage parlor with the driver. The passenger came back out of the massage parlor and

retrieved several grocery bags from the trunk of the BMW and carried them back inside. On September 28, 2026, surveillance observed the BMW depart the area of Cherry Valle Lane driven by ZZX. The BMW traveled to Asian Massage (Penn) and ZZX entered the parlor. ZZX eventually departed in the BMW after leaving the massage parlor with a bag or basket. On October 1, 2026, surveillance observed the BMW depart Cherry Valle Lane driven by ZZX. She traveled directly to Flint Asian Massage and entered the massage parlor with multiple bags. Later, ZZX departed the massage parlor with a plastic tote and drove back to Cherry Valle Lane in the BMW. On October 2, 2026, surveillance observed the BMW depart Cherry Valle Lane driven by ZZX. She traveled directly to Flint Asian Massage where she waited in the vehicle while an unidentified woman approached from the massage parlor and exchanged an unidentified item or items. The unidentified woman then retrieved bags from the trunk of the BMW, and both women entered the massage parlor. ZZX returned to the BMW later that day.

63. These events establish a direct connection between each vehicle and the transportation of workers, supplies, operators, and/or items exchanged in connection with the parlors, residences, and remittance activity.

64. Based on these facts, I believe, in the Target Vehicles, investigators can reasonably expect to find evidence of WW and ZZX's management of the parlors and transportation of workers, property, and proceeds, including cellular telephones or other electronic devices, U.S. currency, bags or containers used to carry money or business materials, receipts, money orders, banking or payment records, employee or

customer information, and navigation or location information reflecting travel among the parlors, Cherry Valle Lane, and connection with CS. This belief is based on repeated surveillance showing WW and/or ZZX using the vehicles to visit the parlors, transport workers and their belongings, carry bags into and out of the businesses, and return to Cherry Valle Lane after parlor visits.

WW and ZZX's Person

65. On the person of WW and ZZX, investigators reasonably expect to find cellular telephones or other portable electronic devices used to communicate with each other, workers, customers, CS, or other co-conspirators; U.S. currency or other proceeds; keys or access devices for the parlors, residence, or vehicles; and documents or information identifying accounts, businesses, workers, or other participants. WW and ZZX's repeated personal travel among and direct participation in the operations of the massage parlors provide reason to believe they carry such evidence while managing the businesses.

Search Request and Manner of Execution

66. Based on the above information, I submit there is probable cause that evidence of violations of Title 18 U.S.C. § 1952 is located at the place described in **Attachment A.** I request permission to search this location for the items described in **Attachment B**.

Review & Collection of Phone Evidence

67. If authorized, investigators will search the locations described in **Attachment A** for smart phones, in addition to other evidence of the subject offenses described above. Phones determined on-scene not to contain items listed in **Attachment B** will be left

at the search premises. The remaining phones will be seized and searched for further review or forensic examination and will be returned as soon as reasonably possible if they are determined not to contain evidence listed in **Attachment B**.

68. The proposed warrant would permit law enforcement personnel to compel a phone's possessor to unlock any electronic devices requiring biometric access subject to seizure pursuant to this warrant. The grounds for this request are as follows:

    a. I know from my training and experience, as well as from information found in publicly available materials published by device manufacturers, that many electronic devices, particularly newer mobile devices and laptops, offer users the ability to unlock the device through biometric features in lieu of a numeric or alphanumeric passcode or password. These biometric features include fingerprint scanners, facial recognition features, and iris recognition features. Some devices offer a combination of these biometric features and the user of such devices can select which features they would like to utilize.

    b. If a device is equipped with a fingerprint scanner, a user may enable the ability to unlock the device through his or her fingerprints. For example, Apple offers a feature called "Touch ID," which allows a user to register up to five fingerprints that can unlock a device. Once a fingerprint is registered, a user can unlock the device by pressing the relevant finger to the device's Touch ID sensor, which is found in the round button (often referred to as the "home" button) located at the bottom center of the front of the device.

The fingerprint sensors found on devices produced by other manufacturers have different names but operate similarly to Touch ID.

c. If a device is equipped with a facial-recognition feature, a user may enable the ability to unlock the device through his or her face. For example, this feature is available on certain Android devices and is called "Trusted Face." During the Trusted Face registration process, the user holds the device in front of his or her face. The device's front-facing camera then analyzes and records data based on the user's facial characteristics. The device can then be unlocked if the front-facing camera detects a face with characteristics that match those of the registered face. Facial recognition features found on devices produced by other manufacturers have different names but operate similarly to Trusted Face.

d. If a device is equipped with an iris-recognition feature, a user may enable the ability to unlock the device with his or her irises. For example, on certain Microsoft devices, this feature is called "Windows Hello." During the Windows Hello registration, a user registers his or her irises by holding the device in front of his or her face. The device then directs an infrared light toward the user's face and activates an infrared-sensitive camera to record data based on patterns within the user's irises. The device can then be unlocked if the infrared-sensitive camera detects the registered irises. Iris-recognition features found on devices produced by other manufacturers have different names but operate similarly to Windows Hello.

e. In my training and experience, users of electronic devices often enable the aforementioned biometric features because they are considered to be a more convenient way to unlock a device than by entering a number or alphanumeric passcode or password. Moreover, in some instances, biometric features are considered to be a more secure way to protect a device's contents. This is particularly true when users of a device are engaged in criminal activities and thus have a heightened concern about securing the contents of a device.

f. As discussed, I have reason to believe that one or more digital devices will be found during the search. The passcode or password that would unlock the devices subject to search under this warrant currently is not known to law enforcement. Thus, law enforcement personnel may not otherwise be able to access the data contained within the devices, making the use of biometric features necessary to the execution of the search authorized by this warrant.

g. I also know from my training and experience, as well as from information found in publicly available materials, including those published by device manufacturers, that biometric features will not unlock a device in some circumstances even if such features are enabled. This can occur when a device has been restarted, inactive, or has not been unlocked for a certain period of time. For example, Apple devices cannot be unlocked using Touch ID when (1) more than 48 hours has elapsed since the device was last

unlocked; or (2) when the device has not been unlocked using a fingerprint for eight hours and the passcode or password has not been entered in the last six days. Similarly, certain Android devices cannot be unlocked with Trusted Face if the device has remained inactive for four hours. Biometric features from other brands carry similar restrictions. Thus, in the event law enforcement personnel encounter a locked device equipped with biometric features, the opportunity to unlock the device through a biometric feature may exist for only a short time.

69. In light of the foregoing, if law enforcement personnel encounter any electronic devices that are subject to seizure pursuant to this warrant and may be unlocked using one of the aforementioned biometric features, this warrant permits law enforcement personnel to (1) press or swipe the fingers (including thumbs) of the device's possessor to the fingerprint scanner of the devices found; (2) hold the electronic devices in front of the face of the device possessor and activate the facial recognition feature; and/or (3) hold the devices found in front of the face of the device possessor and activate the iris-recognition feature, for the purpose of attempting to unlock the devices in order to search the contents as authorized by this warrant. The proposed warrant does not authorize law enforcement personnel to compel that all individuals present must state or otherwise provide the password or any other means that may be used to unlock or access the devices. Moreover, the proposed warrant does not authorize law enforcement to compel the individuals to identify the specific biometric

characteristics (including the unique finger(s) or other physical features) that may be used to unlock or access the devices.

Conclusion

70. For the reasons explained above, I ask that this Court authorize a search of the location described in **Attachment A** for the material described in **Attachment B.**