

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CIVIL ACTION NO.: 2:25-cv-41

**\$27, 553.25 in U.S. CURRENCY
20 British Pounds
120 Hong Kong Dollars
and 130 Chinese Yuan,**

Defendants *in rem*.

[Fumin Chen]

VERIFIED COMPLAINT FOR FORFEITURE *in rem*

Comes now the United States of America, by and through its attorneys, William S. Thompson, United States Attorney for the Southern District of West Virginia, and Justin A. Marlowe, Assistant United States Attorney for the Southern District of West Virginia, and alleges as follows in accordance with Rule G of the Supplement Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions:

NATURE OF THE ACTION

1. This is a civil action *in rem* brought on behalf of the United States of America, pursuant 18 U.S.C. § 983 to enforce the provision of 18 U.S.C. § 2428(b)(1)(B) for the forfeiture of any property, real or personal, that constitutes or is derived from proceeds in violation of 18 U.S.C. § 2421(a), transporting or attempting to transport individuals in interstate commerce, with the intent that such individuals engage in prostitution, or any sexual activity for which person can be charged for criminal offense.

THE DEFENDANTS *in rem*

2. The defendants currency, both United States currency and foreign currency hereinafter (“Defendant Currency”), seized on, or about, September 21, 2023, is more particularly described as follows:

- a. \$27,553.25 in U.S. Currency;
- b. 20 British Pounds;
- c. 120 Hong Kong Dollars; and
- d. 133 Chinese Yuan.

3. The Defendant Currency is currently in the custody of the United States Federal Bureau of Investigation.

JURISDICTION AND VENUE

4. Plaintiff, United States of America, brings this action *in rem* in its own right to forfeit and condemn the Defendants. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

5. This Court has *in rem* jurisdiction over the Defendant Currency pursuant to 28 U.S.C. § 1355(b)(1), since the acts or omissions giving rise to the forfeiture occurred in the Southern District of West Virginia.

6. Upon the filing of this Verified Complaint *in rem*, the United States requests that the Clerk of this Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b)(i) which, the Plaintiff will execute upon the seized Defendant Currency, pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

7. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1)(A), because the

acts or omission giving rise to the forfeiture occurred in this District and, pursuant to 28 U.S.C. § 1395(b) because the property is located in this District.

STATUTORY BACKGROUND

8. Pursuant to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and Rule 32.2(a) of the Federal Rules of Criminal Procedure, upon the conviction of an offense in violation of 18 U.S.C. § 2421(a) shall forfeit to the United States of America such person's interest in any property, real or personal that was intended to be used to commit or to facilitate commission of such violation, et seq.

BASIS FOR FORFEITURE

9. The defendant is subject to forfeiture to the United States, pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 2428(b)(1)(B), on the grounds that Defendant Currency constitutes or is derived from proceeds traceable to any violation of 18 U.S.C. § 2421, et seq.

FACTS

10. In, or around November of 2022, the United States Federal Bureau of Investigation hereinafter ("FBI") began an investigation of Yang Yang Bodywork, Inc., hereinafter ("YYB"), a massage parlor, located at 5411 MacCorkle Avenue in Charleston, West Virginia. Incorporator and owner, Fumin Chen was suspected of trafficking persons for the purpose of engaging in prostitution through the business YYB.

11. On August 2, 2023, at approximately 3:19 a.m., FBI video surveillance captured a female exiting YYB, with a suitcase. The female then exchanged suitcases with the driver of a passenger van. The women went back into the business as another person exited and got into the passenger van.

12. On September 6, 2023, Special Agent Lee conducted an open source

research concerning advertising of the massage parlor business. On skipthegames.com the listing showed photographs of Asian females performing various sexual acts. Some of the statements made about the business in the listing were "sexy and skillful asian girl who knows how to please men," "love French Kissing n Touching," and "Don't be alone today. Call me now." On the same listing under "our service" was the following: "360 Rotatio G* F* E, duo shower together, touching, hot B2B nuru massage, kitty sitting ur face, lick my juicy kitty, lick your ball, sweet and discreet, shower together, 69.Bbbj, GFE, kiss & touch lick, and love making nipple sucking".

13. A search warrant was issued in the United States District Court for the Southern District of West Virginia on September 18, 2023.

14. The search warrant was executed at 5411 1/2 MacCorckle Avenue, SE, Charleston, West Virginia on September 21, 2023, at which time Defendant Currency was seized by the FBI. The seized items and the location of their seizure are described as follows:

- a. \$27, 149.00 in U.S. currency, bundled and located in a freezer;
 - b. \$14.00 in U.S. currency, inside a dresser in a massage room;
 - c. \$240.00 in U.S. currency, inside a dresser in one of the workers' areas;
 - d. \$.25 in U.S currency, found in a red iPhone® case;
 - e. \$150.00 in U.S. currency, found in a false bottom of a fake Yuban coffee can;
 - f. 20 British Pounds, found in a locked pink suitcase;
 - g. 120 Hong Kong Dollars, found in a locked pink suitcase; and
 - h. 133 Chinese Yuan, found in a locked pink suitcase.
15. An FBI agent, through a translator, interviewed two women that were workers at

YYB, when the search warrant was served. One worker left family, in China, and paid \$50,000.00 to a “snakehead” to arrange travel to the United States. The snakehead arranged for her to travel to Hong Kong, then Turkey and finally Mexico. She then crossed the border into the United States and after immigration released her, she went to New York to live with a cousin.

16. The other worker stated that she flew directly into Flushing, New York. She also incurred a large debt to travel to the United States. One worker later traveled to West Virginia to work in the massage business.

17. Both women stated that they did not have a massage license, were not regular employees, were paid under the table, and were not interviewed for the job. Both women described being transported to West Virginia, in an Uber type vehicle with other passengers.

18. One worker admitted to committing sexual acts with her hands.

THE DEFENDANT CURRENCY

19. The Defendant Currency was seized from YYB.

20. Thus, the Defendant Currency is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 18 U.S.C. § 2428(b)(1)(B), as proceeds of or money that is intended to be used to facilitate violations of human trafficking for engaging in prostitution.

CLAIMS FOR FORFEITURE

21. The allegations contained in paragraphs 1 through 19 of this Verified Complaint of Forfeiture are incorporated herein and made a part hereof.

22. As a result of the foregoing, the defendants *in rem* are subject to forfeiture to the United States of America pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461 as property that represents the proceeds of or is derived from the proceeds of a violation of 18 U.S.C. § 2421.

23. As a result of the foregoing, the defendants *in rem* are subject to forfeiture to the

United States of America pursuant to 18 U.S.C. § 2428(b)(1)(B) as any property, real or personal, used or intended to be used to commit or to facilitate the commission of any violation of 18 U.S.C. § 2421, et seq.

CONCLUSION

By virtue of the foregoing and pursuant to 18 U.S.C. § 981(a) and 18 U.S.C. § 2428(b), all right, title and interest in the defendant properties vested in the United States at the time of the commission of the unlawful acts giving rise to forfeiture has become and is forfeitable to the United States.

WHEREFORE, the United States of America requests that the Clerk of this Court issue a warrant for the arrest and seizure of the defendants *in rem* pursuant to Rule G(3)(b)(i) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions of the Federal Rules of Civil Procedure, which the plaintiff will execute upon the defendants *in rem* pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c); that notice of this action be given to all persons who reasonably appear to be potential claimant(s) to the defendants *in rem*; that the defendants *in rem* be forfeited and condemned to the United States of America; and that the Court grant such other and further relief it deems Just and Proper.

Respectfully submitted,

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VERIFICATION

STATE OF WEST VIRGINIA

COUNTY OF KANAWHA, to wit:

I, Aaron M. Lee, a Specialist Agent, with the United States Federal Bureau of Investigation, declare under penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That the foregoing Civil Complaint for Forfeiture in rem is based upon my own personal observation, reports and/or information that I personally have prepared or gathered and which have been provided to me by various law enforcement personnel, and that everything contained therein is true and correct to the best of my knowledge and belief, except wherein stated to be upon information and belief, in which case I believe it to be true.

Executed on January 22, 2025.



Aaron M. Lee

Taken, subscribed, and sworn to before me this 22nd day of January
2025.

My commission expires on April 30, 2026.



NOTARY PUBLIC

