

<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO</p> <p>1437 Bannock Street Denver, CO 80202</p> <hr/> <p>THE PEOPLE OF THE STATE OF COLORADO,</p> <p>v.</p> <p>HYE KYEUNG SEO, DOB 8/16/1972 SANG HYON SHIM, DOB 3/15/1963 SEON HEE WOLF, DOB 7/15/1966</p> <p>Defendants.</p>	<p>DATE FILED: April 4, 2022 2:40 PM FILING ID: 92C47B2AAD7CA CASE NUMBER: 2022CR15056</p> <p style="text-align: center;">▲ COURT USE ONLY ▲</p>
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<p>COLORADO STATE GRAND JURY INDICTMENT</p>	

CHARGES:

COUNT ONE
(All Defendants)

COCCA – Pattern of Racketeering – Participation in an Enterprise; §§ 18-17-104(3) and 18-7-105, C.R.S. (F2)
{37284}

COUNT TWO (All Defendants)	COCCA – Conspiracy; §§ 18-17-104(4) and 18-17-104(3), C.R.S. (F2) { 37285 }
COUNT THREE (SEO and SHIM)	Human Trafficking for Sexual Servitude; § 18-3-504(1)(a), C.R.S. (F3) (Victim-1) { 03084 }
COUNT FOUR (SEO and SHIM)	Human Trafficking for Sexual Servitude; § 18-3-504(1)(a), C.R.S. (F3) (Victim-2) { 03084 }
COUNT FIVE (All Defendants)	Conspiracy to Commit Human Trafficking for Sexual Servitude; §§ 18-3-504(1)(a) and 18-2-201, C.R.S. (F4) { 03084C }
COUNT SIX (All Defendants)	Pimping; § 18-7-206, C.R.S. (F3) { 19061 }
COUNT SEVEN (All Defendants)	Conspiracy to Commit Pimping; §§ 18-7-206 and 18-2-201, C.R.S. (F4) { 19061C }
COUNT EIGHT (All Defendants)	Money Laundering; § 18-5-309(1)(a)(II), C.R.S. (F3) (Monarch Casino) { 12212 }
COUNT NINE (SEO and SHIM)	Money Laundering; § 18-5-309(1)(a)(II), C.R.S. (F3) (September 23, 2021) { 12212 }
COUNT TEN (SEO and SHIM)	Money Laundering; § 18-5-309(1)(a)(II), C.R.S. (F3) (November 4, 2021) { 12212 }
COUNT ELEVEN (All Defendants)	Conspiracy to Commit Money Laundering; §§ 18-5-309(1)(a)(I),(a)(II),(b)(I) and § 18-2-201, C.R.S. (F4) { 12212C }
COUNT TWELVE (All Defendants)	Keeping a Place of Prostitution; § 18-7-204(1)(a), C.R.S. (M2) { 19041 } (Jewel Spa)
COUNT THIRTEEN (All Defendants)	Pandering; § 18-7-203(1)(b), C.R.S. (M3) { 19032 } (Jewel Spa)
COUNT FOURTEEN (All Defendants)	Keeping a Place of Prostitution; § 18-7-204(1)(a), C.R.S. (M2) { 19041 } (Pine Therapy)

COUNT FIFTEEN (All Defendants)	Pandering; § 18-7-203(1)(b), C.R.S. (M3) {19032} (Pine Therapy)
COUNT SIXTEEN (All Defendants)	Keeping a Place of Prostitution; § 18-7-204(1)(a), C.R.S. (M2) {19041} (ABC Spa)
COUNT SEVENTEEN (All Defendants)	Pandering; § 18-7-203(1)(b), C.R.S. (M3) {19032} (ABC Spa)
COUNT EIGHTEEN (All Defendants)	Keeping a Place of Prostitution; § 18-7-204(1)(a), C.R.S. (M2) {19041} (A Spa)
COUNT NINETEEN (All Defendants)	Pandering; § 18-7-203(1)(b), C.R.S. (M3) {19032} (A Spa)

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Of the 2021-2022 term of the Denver District Court in the year 2022; the 2021-2022 Colorado State Grand Jurors, chosen, selected and sworn in the name and by the authority of the People of the State of Colorado, upon their oaths, present the following:

INDEX OF COUNTS

Defendant	Counts Applicable
Hye Kyeung Seo	1-19
Sang Hyon Shim	1-19
Seon Hee Wolf	1-2, 5-8, 11-19

ESSENTIAL FACTS

1. HYE KYEUNG SEO resides in Jefferson County, Colorado. In 2020 and the first quarter of 2021, SEO reported taxable income from Hendershott Enterprises and a home cleaning service.

2. SANG HYON SHIM and SEON HEE WOLF reside together in Jefferson County, Colorado. Colorado Department of Labor and Employment records reflect no reported employment by SHIM or WOLF.

3. At all relevant times herein, SEO, SHIM, and WOLF operated four massage parlor locations serving an almost exclusively male clientele in the Cities of Denver and Lakewood, Colorado: Jewel Spa, Pine Therapy, A Spa, and ABC Spa (collectively “the Spas”):

Spa	Address	Most Recent Corporate Entity	Registered Agent
Jewel Spa	1836/1838 S. Sheridan Blvd, Denver, CO	Jewelry Spa, LLC (formed December 8, 2021) Jewel Therapy, Inc (formed September 20, 2019; delinquent as of January 31, 2022)	James Yoo (formed company) James Hendershott (most recent Registered Agent)
Pine Therapy	8485 W. Colfax Ave, Lakewood, CO	Pine Therapy, LLC (formed February 4, 2021)	Sang Hyon Shim (formed company)
ABC Spa	727 Simms St, Unit A Lakewood, CO	Bee Corporations, LLC (formed May 19, 2021)	Seon Hee Wolf (formed company)
A Spa	6469 W. Colfax Ave, Lakewood, CO	A Spa, LLC (formed February 3, 2021)	Sang Hyon Shim (formed company)

4. Financial records, payment records, leases, physical surveillance, and information from individuals who worked at the Spas shows that SEO, SHIM, and WOLF owned, operated, and managed the Spas at all relevant times.

5. At all relevant times, each of the Spas offered sexual services, including sexual intercourse, for money.

6. SEO, SHIM, and WOLF also conspired to coerce women into performing sexual services for money at the Spas, including providing sex without a condom.

7. SEO, SHIM, and WOLF frequently moved employees into and out of the Spas. SHIM made frequent trips to drive female employees between the Spas. SHIM also made frequent trips to Denver International Airport to both pick-up and drop-off female employees of the Spas. While working at the Spas, many of the employees appeared to live and sleep at the Spas.

8. SEO, SHIM, and WOLF profited from and lived off the money earned through prostitution and trafficking at the Spas. SEO, SHIM, and WOLF kept hundreds of thousands of dollars in cash at their residences. SEO, SHIM, and WOLF used money earned through prostitution to further promote prostitution at the Spas, including by paying for rent, utilities, advertising, and supplies for the Spas.

9. SEO, SHIM, and WOLF also took steps to conceal the nature, source, ownership, and control of the money. SEO, SHIM, and WOLF conspired to make multiple small cash deposits at bank ATMs. In doing so, SEO, SHIM, and WOLF structured deposits to avoid bank customer identification requirements and currency transaction reporting requirements. SEO, SHIM, and WOLF also conspired to use casino games to conceal the nature, source, ownership, and control of the money from the Spas.

A. Jewel Spa

10. Jewel Spa is located at 1836/1838 South Sheridan Boulevard in the City and County of Denver, Colorado. Between September 20, 2019 and January 31, 2022, Jewel Therapy Inc. was registered with the Colorado Secretary of State at the address for Jewel Spa. On December 8, 2021, James Yoo formed Jewelry Spa, LLC, registered at the address for Jewel Spa. Yoo served as the registered agent. On or about January 4, 2022, SEO sent or caused to be sent a check to James Yoo for \$500.

11. WOLF served as an “Emo,” or manager, for Jewel Spa.

12. Jewel Spa has a public website featuring multiple images of women wearing revealing clothing or lingerie with their faces blurred. Jewel Spa also advertised on the internet, often using imagery of women dressed provocatively or in lingerie.

13. As of February 10, 2022, Jewel Spa had 32 reviews on a massage review website known to the Grand Jury. For example, one user wrote that he had received full sex with a condom and oral sex with a condom, at a cost of \$60 to the house and \$140 for an extra tip.

14. Jewel Spa had condoms hidden in locations throughout the spa, including in baby wipes containers and a Pringles can, so that the employees could engage in sexual activity with customers.

15. Jewel Spa also had a small bedroom and kitchen, where employees appeared to live and sleep. WOLF, for example, appeared to have slept at the Spa the night before March 2, 2022, with three other female employees.

B. Pine Therapy

16. Pine Therapy is located at 8485 West Colfax Avenue in Jefferson County, Colorado. As of February 4, 2021, Pine Therapy, LLC, is registered with the Colorado Secretary of State at the address for Pine Therapy. SHIM formed Pine Therapy, LLC and is the registered agent.

17. On June 2, 2021, SHIM opened a bank account for Pine Therapy through Wells Fargo.

18. Pine Therapy advertised on the internet, often using imagery of women dressed provocatively.

19. As of February 10, 2022, Pine Therapy had 120 reviews on a massage review website known to the Grand Jury. For example, one user wrote that he had received full sex with a condom and oral sex with a condom, at a cost of \$60 to the house and \$140 to the provider.

20. Pine Therapy had condoms hidden in locations throughout the Spa, including in the center of an aluminum foil roll, so that employees could engage in sexual activity with customers.

21. Pine Therapy also had a small bedroom where employees appeared to live and sleep.

22. In a search of SHIM and WOLF's house, records relating to Pine Therapy were found, including a lease for Pine Therapy signed by SHIM.

C. A Spa

23. A Spa is located at 6469 West Colfax Avenue in Jefferson County, Colorado. As of February 3, 2021, A Spa, LLC, is registered with the Colorado Secretary of State at the address for A Spa. SHIM formed A Spa, LLC, and is the registered agent.

24. On June 2, 2021, SHIM opened a bank account at Wells Fargo for A Spa.

25. Advertisements for A Spa were posted on the internet, often using imagery of women dressed provocatively.

26. As of February 10, 2022, A Spa had 106 reviews on a massage review website known to the Grand Jury. For example, one user wrote that he had received full sex with a condom and oral sex with a condom, at a cost of \$60 to the house and \$150 tip to the provider.

27. A Spa had condoms hidden in various locations around the spa, including in a chewing gum container, so that the employees could engage in sexual activity with customers.

28. A Spa also had a small bedroom where employees appeared to live and sleep. For example, SEO appeared to have slept at the Spa the night before March 2, 2022, with at least one other female employee.

D. ABC Spa

29. ABC Spa is located at 727 Simms Street, Unit A in Jefferson County, Colorado. As of May 19, 2021, Bee Corporations, LLC, is registered with the Colorado Secretary of State at the address for ABC Spa. WOLF formed Bee Corporations, LLC, and is the registered agent. As of January 26, 2022, ABC Spa displayed a massage therapy license for WOLF.

30. WOLF opened a bank account for Bee Corporations, LLC, with FirstBank.

31. ABC Spa advertised on the internet, often using imagery of women dressed provocatively.

32. As of February 10, 2022, ABC Spa had 27 reviews on a massage review website known to the Grand Jury. For example, one user wrote that he had received

full sex with a condom and oral sex with a condom, at a cost of \$60 to the house and \$150 tip to the provider.

33. ABC Spa had condoms hidden in various locations around the spa, including a chewing gum container, so that employees could engage in sexual activity with customers.

34. ABC Spa also had a small bedroom where employees appeared to live and sleep.

35. The essential facts in paragraphs 1-34 above are incorporated into each of the separate counts identified below.

COUNT ONE

**Violation of the Colorado Organized Crime Control Act – Pattern of Racketeering – Participation in an Enterprise (F2)
§§ 18-17-104(3) and 18-7-105, C.R.S.**

On or about and between January 1, 2021 through March 2, 2022, in and triable in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**, and others both known and unknown to the Grand Jury, while employed by or associated with an enterprise, unlawfully, feloniously, and knowingly conducted or participated, directly or indirectly, in an enterprise through a pattern of racketeering activity; in violation of §§ 18-17-104(3) and 18-7-105, C.R.S.

COUNT TWO

**Violation of the Colorado Organized Crime Control Act – Conspiracy (F2)
§§ 18-17-104(4) and 18-17-104(3), C.R.S**

On or about and between January 1, 2021 through March 2, 2022, in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**, and others both known and unknown to the Grand Jury, did unlawfully, knowingly, and feloniously conspire or endeavor to conduct and participate, directly or indirectly, in an enterprise, through a pattern of racketeering activity; in violation of §§ 18-17-104(4) and 18-17-104(3), C.R.S.

The offenses alleged in Counts One and Two were committed in the following manner:

The Enterprise

36. The Enterprise alleged in Counts One and Two is primarily a group of individuals, associated in fact, although not a legal entity, as well a number of affiliated legal entities listed below. The enterprise includes, but is not limited to, the following associated in fact individuals and legal entities:

HYE KYEUNG SEO
SANG HYON SHIM
SEON HEE WOLF
JEWEL SPA
JEWELRY SPA, LLC
JEWEL THERAPY, INC
PINE THERAPY
PINE THERAPY, LLC
A SPA
A SPA, LLC
ABC SPA
BEE CORPORATIONS, LLC

and other persons or entities known or unknown to the Grand Jury and the Attorney General.

37. The members of the Enterprise collaborated with one or more of the others as principals or complicitors to use their connections through massage parlor locations, business affiliations, banking affiliations, vehicles owned by members of the Enterprise, and employees of massage parlor locations, to execute a complex human trafficking, pimping, prostitution, and money laundering scheme. The parties used a series of physical massage parlor locations and registered State of Colorado businesses to commit various acts of human trafficking, pimping, pandering, and money laundering.

38. The funds from these illicit activities were used as income by the various members of the Enterprise. Members of the Enterprise used limited liability companies to further support the activity of the enterprise and to conceal the identity of individuals operating within the Enterprise. Throughout the course of this investigation, the Grand Jury has developed evidence to show that the Enterprise and its members profited from these criminal acts.

39. The associations between members of the Enterprise are demonstrated through a variety of records, including but not limited to: business records, banking records, vehicle registrations, and phone records. Physical surveillance and vehicular

tracking data shows that individuals within the Enterprise made regular visits to Jewel Spa, Pine Therapy, A Spa, and ABC Spa, as well as between residences associated with SEO and SHIM/WOLF. SEO maintained frequent phone communication with SHIM and WOLF, as well as with phone numbers associated with each of the Spas.

40. The Enterprise has operated since at least January 1, 2021. Based on the investigation, SEO appeared to have oversight over each of the Spas. SEO shared this oversight with SHIM, who also took responsibility for driving Spa employees to and from the airport, to various banks and businesses, and between Spa locations. WOLF managed Jewel Spa on a day-to-day basis.

41. The alleged behavior occurred in various jurisdictions, including the City and County of Denver, Jefferson County, and Gilpin County.

Pattern of Racketeering Activity

42. **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**, and others known and unknown to the Grand Jury, directly and in concert, engaged in, attempted to engage in, conspired to engage in, or solicited another to engage in at least two predicate acts, related to the conduct of the enterprise, with at least one of which took place in the State of Colorado after July 1, 1981 and the last of the acts of racketeering activity occurring within ten years after a prior act of racketeering activity and include:

Human Trafficking for Sexual Servitude, § 18-3-504(1)(a), C.R.S.
Conspiracy to Commit Human Trafficking for Sexual Servitude, §§ 18-3-504(1)(a) and 18-2-201, C.R.S.
Pimping, § 18-7-206, C.R.S.
Conspiracy to Commit Pimping, §§ 18-7-206 and 18-2-201, C.R.S.
Money Laundering, § 18-5-309(1)(a)(II), C.R.S.
Conspiracy to Commit Money Laundering, §§ 18-5-309(1)(a)(I),(a)(II),(b)(I) and 18-2-201, C.R.S.
Pandering, § 18-7-203(1)(b), C.R.S.

Racketeering Activity

43. The acts of racketeering activity that the above-named persons committed, attempted to commit, conspired to commit, or solicited, coerced, or intimidated another person to commit, consist of the following predicate acts, including any lesser included offenses, namely the acts described below in Counts Three through Eleven, Thirteen, Fifteen, Seventeen, and Nineteen.

COUNT THREE
Human Trafficking for Sexual Servitude (F3)
§ 18-3-504(1)(a), C.R.S.

On or about and between November 1, 2021 to December 26, 2021, in the State of Colorado, **HYE KYEUNG SEO and SANG HYON SHIM** unlawfully, knowingly, and feloniously sold, recruited, harbored, transported, transferred, isolated, enticed, provided, received, or obtained by any means another person, namely Victim-1, an individual known to the Grand Jury, for the purpose of coercing her to engage in commercial sexual activity; in violation of § 18-3-504(1)(a), C.R.S.

COUNT FOUR
Human Trafficking for Sexual Servitude (F3)
§ 18-3-504(1)(a), C.R.S.

On or about and between January 2, 2022 to February 2, 2022, in the State of Colorado, **HYE KYEUNG SEO and SANG HYON SHIM** unlawfully, knowingly, and feloniously sold, recruited, harbored, transported, transferred, isolated, enticed, provided, received, or obtained by any means another person, namely Victim-2, an individual known to the Grand Jury, for the purpose of coercing her to engage in commercial sexual activity; in violation of § 18-3-504(1)(a), C.R.S.

COUNT FIVE
Conspiracy to Commit Human Trafficking for Sexual Servitude (F4)
§§ 18-3-504(1)(a) and 18-2-201, C.R.S.

On or about and between August 1, 2021 and March 2, 2022, in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**, with the intent to promote or facilitate the commission of the crime of Human Trafficking for Sexual Servitude, unlawfully and feloniously agreed with one another and persons known and unknown to the Grand Jury that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of §§ 18-3-504(1)(a) and 18-2-201, C.R.S.

Facts that support the offenses set forth in Counts Three through Five above include, but are not limited to, the following:

44. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Three through Five by this reference.

45. Between August 1, 2021 and March 2, 2022, SEO, SHIM, and WOLF conspired to coerce women into engaging in sexual activity for money with customers at the Spas, to the financial benefit of SEO, SHIM, and WOLF.

46. SEO coerced women into providing sexual intercourse without a condom if a customer requested it.

47. Victim-1 came to Colorado to work as a manager at A Spa in November 2021. On arrival in Colorado, SHIM drove her from Denver International Airport to A Spa. Although Victim-1 was hired as a manager for A Spa, SEO told her that she must provide sex to customers if there were not enough workers, and that she must have sex without a condom if a customer requested. Victim-1 did not want to provide sex for money to customers. When Victim-1 refused, SEO became angry, yelled, and would throw things, causing Victim-1 to fear serious harm. Victim-1 also witnessed SEO break other employees' phones when they refused to follow SEO's instructions.

48. Victim-1 described how customers would pay \$60 to the Spa to engage in sexual activity, with a tip around \$140 provided directly to Victim-1 or the other worker having sex with the customer. Victim-1 also had to pay SEO money for living expenses, including food, water, and transportation. Victim-1 left after Christmas 2021.

49. Victim-2 came to Colorado to work at A Spa beginning around January 2, 2022. SHIM transported Victim-2 to the Spas so that she could have sex for money. SEO told Victim-2 to have sex with customers for money. Victim-2 rotated between all four Spas. Victim-2 had sex with approximately ten men per day. The customers would pay the Spas for sex with Victim-2. Victim-2 also had to pay the Spa owner, SEO, plus a commission to the spa managers, including WOLF, for each sexual encounter.

50. SEO told Victim-2 that if a customer did not want to use a condom, Victim-2 should not use a condom. Victim-2 is an undocumented immigrant who fled North Korea. SEO threatened Victim-2 based on her immigration status into performing sexual services for money, including sex without a condom. SEO told Victim-2 that, as an undocumented immigrant, she would be unable to work other than by performing sexual services for money, causing Victim-2 to fear serious harm if she did not provide sexual services for money.

COUNT SIX
Pimping (F3)
§ 18-7-206, C.R.S.

On or about and between January 1, 2021 and March 2, 2022, in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**, unlawfully, feloniously, and knowingly lived on, were supported, or were maintained in whole or in part by money or other thing of value earned, received, procured or realized by another person through prostitution; in violation of § 18-7-206, C.R.S.

COUNT SEVEN
Conspiracy to Commit Pimping (F4)
§§ 18-7-206 and 18-2-201, C.R.S.

On or about and between January 1, 2021 and March 2, 2022, in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**, with the intent to promote or facilitate the commission of the crime of Pimping, unlawfully and feloniously agreed with one another and persons known and unknown to the Grand Jury that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of §§ 18-7-206 and 18-2-201, C.R.S.

Facts that support the offenses set forth in Counts Six and Seven above include, but are not limited to, the following:

51. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Six and Seven by this reference.

52. SEO, SHIM, and WOLF used money, primarily cash, obtained from prostitution occurring at the Spas to live on, support their lifestyles, and maintain their standard of living. Money from the Spas was used to pay for rent, shopping, food, and other daily living expenses.

53. Victim-1 and Victim-2 both described commercial sexual activity occurring at each of the Spas, including the Spas offering sexual intercourse with and without a condom for money.

54. Throughout 2021, surveillance and vehicle tracking repeatedly showed SEO and SHIM visiting each of the Spas.

55. Throughout 2021, surveillance, vehicle tracking, and bank records showed repeated instances of SHIM driving from one or more of the Spas to a bank to deposit money. SHIM would often deposit money into SEO's bank accounts.

56. Bank records for SEO, SHIM, and WOLF at Bank of America and Wells Fargo show most of the money in their respective bank accounts during this time period came from cash deposits.

57. On March 2, 2022, when search warrants were executed on the Spas and the homes of SEO, SHIM, and WOLF, law enforcement recovered significant amounts of cash:

Location	Approximate Amount
SEO's Residence	\$215,000
SHIM/WOLF's Residence	\$183,600
A Spa	\$5,103
ABC Spa	\$4,630
Jewel Spa	\$1,500

58. There is no identifiable source for the deposits in SEO, SHIM, and WOLF's bank accounts, or for the cash found in their respective residences, other than from sources associated with the Spas.

59. A search of each of the Spas, as further described below, found condoms hidden in various locations throughout each of the Spas. The same type of condoms was found during the search of SEO's residence. In addition, each Spa had ledgers for each day, with rows for appointments labeled 1-12, and with each column labeled with a female name or initial. The ledgers summarized the money earned each day at the bottom. Identical ledgers were found at SHIM and WOLF's residence. SEO also had a money counter and bands labeled "\$1000" and "\$10,000" at her residence.

COUNT EIGHT

Money Laundering – Financial Transaction to Conceal or Disguise Nature or Avoid Reporting (F3) § 18-5-309(1)(a)(II), C.R.S

On or about September 16, 2021, in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF** unlawfully and feloniously, conducted or attempted to conduct a financial transaction that involved money laundering or any other thing of value that the defendants knew or believed to be proceeds, in any form, of a criminal offense, with knowledge or a belief that the transaction was designed in whole or in part to conceal or disguise the nature,

location, source, ownership or control of the proceeds of a criminal offense, or to avoid a transaction reporting requirement under federal law; in violation of § 18-5-309(1)(a)(II), C.R.S.

COUNT NINE

**Money Laundering – Financial Transaction to Conceal or Disguise Nature
or Avoid Reporting (F3)**

§ 18-5-309(1)(a)(II), C.R.S

On or about September 23, 2021, in the State of Colorado, **HYE KYEUNG SEO and SANG HYON SHIM** unlawfully and feloniously conducted or attempted to conduct a financial transaction that involved money or any other thing of value that the defendants knew or believed to be proceeds, in any form, of a criminal offense, with knowledge or a belief that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the proceeds of a criminal offense, or to avoid a transaction reporting requirement under federal law; in violation of § 18-5-309(1)(a)(II), C.R.S.

COUNT TEN

**Money Laundering – Financial Transaction to Conceal or Disguise Nature
or Avoid Reporting (F3)**

§ 18-5-309(1)(a)(II), C.R.S

On or about November 4, 2021, in the State of Colorado, **HYE KYEUNG SEO and SANG HYON SHIM** unlawfully and feloniously conducted or attempted to conduct a financial transaction that involved money or any other thing of value that the defendants knew or believed to be proceeds, in any form, of a criminal offense, with knowledge or a belief that the transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the proceeds of a criminal offense, or to avoid a transaction reporting requirement under federal law; in violation of § 18-5-309(1)(a)(II), C.R.S.

COUNT ELEVEN

Conspiracy to Commit Money Laundering (F4)

§§ 18-5-309(1)(a)(I),(a)(II),(b)(I) and 18-2-201, C.R.S

On or about and between January 1, 2021 and March 2, 2022, in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**, with the intent to promote or facilitate the commission of the crime of Money Laundering, unlawfully and feloniously agreed with one another and persons known and unknown to the Grand Jury that one or more of them would engage in conduct which constituted that crime or an attempt to commit that crime, or

agreed to aid the other person or persons in the planning or commission or attempted commission of that crime, and an overt act in pursuance of the conspiracy was committed by one or more of the conspirators; in violation of §§ 18-5-309(1)(a)(I),(a)(II),(b)(I) and 18-2-201, C.R.S.

Facts that support the offenses set forth in Counts Eight through Eleven above include, but are not limited to, the following:

60. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Eight through Eleven by this reference.

61. SEO, SHIM, and WOLF conspired to launder the money from the Spas to conceal and disguise the nature, source, ownership, and control of the money, including that the money came from illegal prostitution and human trafficking occurring at the Spas. SEO, SHIM, and WOLF used some of the illegal proceeds as their own income. SEO, SHIM, and WOLF also used the illegal proceeds to further promote the prostitution and human trafficking occurring at the Spas.

62. SEO, SHIM, and WOLF used multiple methods to conceal and disguise the nature, source, ownership, and control of the money, including laundering money through casinos, the use of money orders, making repeated small cash deposits through ATM deposits, and evading federal transaction reporting requirements.

63. Between January 1, 2021 and March 2, 2022, SHIM and SEO made or caused to be made multiple small cash deposits into various bank accounts, including at Bank of America and Wells Fargo. SEO, SHIM, and WOLF further agreed to use small ATM cash deposits to evade customer identification and documentation requirements for transactions equal to or greater than \$3,000 under 31 U.S.C. § 5325 and currency transaction reporting requirements under 31 U.S.C. § 5313.

64. On September 16, 2021, SHIM drove SEO and WOLF to Monarch Casino in Gilpin County. SEO and WOLF entered the casino with over \$17,600 in cash from the Spas. SEO and WOLF repeatedly fed the cash through slot machines, without appearing to play the slots. SEO and WOLF cashed the money out onto a casino voucher, which they in turn partially cashed out at the casino for \$13,000, and the rest in a casino voucher.

65. On or about September 23, 2021, SHIM and SEO made or caused to be made multiple, small cash deposits into SEO's accounts at Bank of America and Wells Fargo using ATMs. SHIM made several of the ATM deposits into SEO's account, using SEO's bank card. The small cash deposits at the ATM avoided bank customer

identification requirements that would have been triggered if the transaction was processed inside the bank.

66. On or about November 4, 2021, SHIM and SEO made or caused to be made multiple, small cash deposits into SEO's accounts at Bank of America and Wells Fargo using ATMs. SHIM made several of the ATM deposits into SEO's account, using SEO's bank card. The small cash deposits at the ATM avoided bank customer identification requirements if the transaction was processed inside the bank.

67. Between January 1, 2021 and March 2, 2022, SEO, SHIM, and WOLF used money from the Spas to purchase supplies for the Spas, pay rent at the Spa locations, and pay utility bills for the Spa locations. SEO, SHIM, and WOLF often used cash at the Spas to purchase money orders, which were then used to pay bills and rent to further promote the Spas.

COUNT TWELVE

Keeping a Place of Prostitution (M2) (Jewel Spa)

§ 18-7-204(1)(a), C.R.S

On or about and between January 1, 2021 through March 2, 2022, in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**, while having or exercising control over the use of a place, namely Jewel Spa, which offered seclusion or shelter for the practice of prostitution, unlawfully and knowingly granted or permitted the use of such place for the purpose of prostitution; in violation of § 18-7-204(1)(a), C.R.S.

COUNT THIRTEEN

Pandering (M3) (Jewel Spa)

§ 18-7-203(1)(b), C.R.S

On or about and between January 1, 2021 through March 2, 2022, in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**, for money or other thing of value, unlawfully arranged or offered to arrange a situation in which a person could practice prostitution; in violation of § 18-7-203(1)(b), C.R.S.

COUNT FOURTEEN

Keeping a Place of Prostitution (M2) (Pine Therapy)

§ 18-7-204(1)(a), C.R.S

On or about and between February 4, 2021 through March 2, 2022, in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**,

while having or exercising control over the use of a place, namely Pine Therapy, which offered seclusion or shelter for the practice of prostitution, unlawfully and knowingly granted or permitted the use of such place for the purpose of prostitution; in violation of § 18-7-204(1)(a), C.R.S.

COUNT FIFTEEN
Pandering (M3) (Pine Therapy)
§ 18-7-203(1)(b), C.R.S

On or about and between February 4, 2021 through March 2, 2022, in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**, for money or other thing of value, unlawfully arranged or offered to arrange a situation in which a person could practice prostitution; in violation of § 18-7-203(1)(b), C.R.S.

COUNT SIXTEEN
Keeping a Place of Prostitution (M2) (ABC Spa)
§ 18-7-204(1)(a), C.R.S

On or about and between May 19, 2021 through March 2, 2022, in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**, while having or exercising control over the use of a place, namely ABC Spa, which offered seclusion or shelter for the practice of prostitution, unlawfully and knowingly granted or permitted the use of such place for the purpose of prostitution; in violation of § 18-7-204(1)(a), C.R.S.

COUNT SEVENTEEN
Pandering (M3) (ABC Spa)
§ 18-7-203(1)(b), C.R.S

On or about and between May 19, 2021 through March 2, 2022, in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**, for money or other thing of value, unlawfully arranged or offered to arrange a situation in which a person could practice prostitution; in violation of § 18-7-203(1)(b), C.R.S.

COUNT EIGHTEEN
Keeping a Place of Prostitution (M2) (A Spa)
§ 18-7-204(1)(a), C.R.S

On or about and between February 3, 2021 through March 2, 2022, in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**, while having or exercising control over the use of a place, namely A Spa, which

offered seclusion or shelter for the practice of prostitution, unlawfully and knowingly granted or permitted the use of such place for the purpose of prostitution; in violation of § 18-7-204(1)(a), C.R.S.

COUNT NINETEEN
Pandering (M3) (A Spa)
§ 18-7-203(1)(b), C.R.S

On or about and between February 3, 2021 through March 2, 2022, in the State of Colorado, **HYE KYEUNG SEO, SANG HYON SHIM, and SEON HEE WOLF**, for money or other thing of value, unlawfully arranged or offered to arrange a situation in which a person could practice prostitution; in violation of § 18-7-203(1)(b), C.R.S.

Facts that support the offenses set forth in Counts Twelve through Nineteen above include, but are not limited to, the following:

68. All of the facts supporting all other counts in this Indictment and the Essential Facts are incorporated in Counts Twelve through Nineteen by this reference.

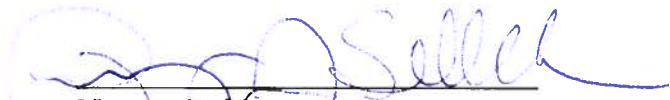
PHILIP J. WEISER
Attorney General



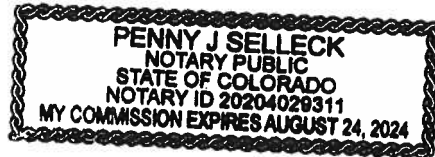
RYAN LIPES, #53514
Assistant Attorney General
Special Prosecutions Unit
Criminal Justice Section

Subscribed to before me in the City and County of Denver, State of Colorado, this

31st day of March, 2022.


Notary Public

My commission expires: _____



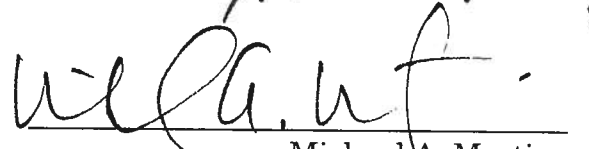
The 2021-2022 Colorado Statewide Grand Jury presents the Indictment contained within and the same is hereby ORDERED FILED this 4th day of April, 2022.

Pursuant to § 13-73-107, C.R.S., the Court designates Denver County, Colorado as the county of venue for the purposes of trial.

Arrest Warrants with bond amounts and conditions are issued for the following nine individuals and the bond amounts and conditions are listed as follows:

HYE KYEUNG SEO, DOB 8/16/1972 22CR1224
SANG HYON SHIM, DOB 3/15/1963 22CR1223
SEON HEE WOLF, DOB 7/15/1966 22CR1226

* HYE KYEUNG SEO, DOB 8/16/1972 ^{cash only} \$50,000.00, pre-trial supervision w/ maximum supervision.
* SANG HYON SHIM, DOB 3/15/1963 ^{cash only} \$5,000.00 pre-trial supervision w/ max supervision.
* SEON HEE WOLF, DOB 7/15/1966 ^{cash only} \$5,000.00 cash only; pre-trial supervision w/ max supervision.



Michael A. Martinez
Chief Judge

Designated Presiding Judge for the Statewide Grand Jury
Second Judicial District,
State of Colorado

* All defendants shall continue to acknowledge all prospects
all defendants have executed waivers of extradition
all bonds previously posted in 22CR1224, 22CR1223, 22CR1226
may be applied as bonds in this case upon dismissal of those
actions.