

**STATE OF NEW YORK: LOCAL CRIMINAL COURT  
COUNTY OF NEW YORK; CITY OF NEW YORK**

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**THE PEOPLE OF THE STATE OF NEW YORK**

**-against -**

**TONY YOO M/34**

**Defendant.**

**FELONY COMPLAINT**

**NYS Office of the Attorney General**

-----X  
STATE OF NEW YORK     )  
  ) SS.:  
COUNTY OF NEW YORK     )

Detective Walter Harkins, shield 2013, of the New York Police Department ("NYPD"), being duly sworn, deposes and states that on or about and between November 19, 2012 and October 18, 2013, at the dates, times and places noted in the paragraphs below, in the County of New York, State of New York and elsewhere,

**THE DEFENDANT, ACTING IN CONCERT, WITH CO-CONSPIRATORS,**

**COMMITTED THE OFFENSE OF:**

1. Penal Law Section 105.10(1)                             Conspiracy in the Fourth Degree  
  ("E" Felony) (1 Count)

**DEFENDANT TONY YOO COMMITTED THE OFFENSES OF:**

2. Penal Law Section 220.16(1)                             Criminal Possession of a Controlled Substance in  
  the Third Degree ("B" Felony) (6 Counts)
3. Penal Law Section 220.39(1)                             Criminal Sale of a Controlled Substance in the Third  
  Degree ("B" Felony) (6 Counts)

**IN THAT THE DEFENDANT:** with the intent that conduct constituting a class B or class C felony be performed, agreed with one or more persons to engage in or cause the performance of such conduct; knowingly and unlawfully sold a narcotic drug; and knowingly and unlawfully possessed a narcotic drug with intent to sell it;

**THE GROUNDS FOR DEPONENT'S BELIEF ARE AS FOLLOWS:**

Deponent states he participated in an investigation of ongoing narcotics based prostitution organizations, which operated in and around Manhattan, Brooklyn, Long Island, Queens and various other counties within New York State, and that the investigation yielded evidence of the above crimes, which evidence is based on: Deponent's conversations with other law enforcement officials known to the deponent, including members of the New York City Police Department (NYPD) and New York States Office of the Attorney General (OAG),

who also participated in this investigation; observations from physical surveillances; review of lawfully intercepted telephone conversations and text messages; and a review of official telephone and business records.

Deponent is aware that the DEFENDANT, while acting in concert with co-conspirators as well as known and unknown others, did enter into an agreement to sell cocaine (Criminal Sale of a Controlled Substance in the third degree – a class “B” felony) for profit, and that in furtherance of this conspiracy, the DEFENDANT and co-conspirators did commit, among other things, overt acts, some of which are detailed below. The conduct encompassed by the substantive counts detailed below also constitutes some of the overt acts that occurred during the conspiracy.

Deponent states that based on the evidence gathered during the course of this investigation, co-conspirators Beige, Nicky, Tae, Jackie, Sara, HyoJung and Jenny, played managerial roles within the narcotics based prostitution organizations and provided the narcotics to the prostitutes who then distributed those narcotics to the end-users.

Deponent reviewed the transcript from a conversation intercepted on May 12, 2013, at approximately 1:10 p.m. by members of the NYPD, NYSP, and OCTF between Beige and co-conspirator Jasmine. Deponent states the substance of the conversation is as follows:

- Jasmine said the customer left. Beige says she already received the call from customer. Jasmine said the sister (Nicole) did three hours and she did two hours, and rest of the time is for "maek." Jasmine said the customer took the left-over "#2". Beige says don't say such a word. Jasmine said to deduct three hours from Nicole and two hours from Jasmine. Beige said she'll deduct total of five hours. Jasmine agreed.

Deponent is informed by NYPD Police Officer (PO) Joseph Kim that PO Kim has received training in the identification of narcotics and controlled substances based on their color, shape, texture and method of packaging and has participated in two long term narcotics investigations in which coded language was used to describe cocaine and other controlled substances. I am further informed by PO Kim that PO Kim is fluent in speaking and understanding Korean. I am further informed by PO Kim that PO Kim is familiar with the terms “maek” and “#2” with respect to this investigation, and based on his training and experience, and the facts and circumstances of this investigation, PO Kim understands the above terms refer to cocaine (specifically powder cocaine).

Deponent states that Deponent reviewed the transcript from a conversation that was intercepted on June 14, 2013, at approximately 8:52 a.m. between Jackie and HyoJung. Deponent states the substance of the conversation is as follows:

- HyoJung reports to Jackie that Mina (co-conspirator Sarah from Beige) came and picked up a “chunk” yesterday. HyoJung says they need more girls to make some money. Apple did 10 hours with the lawyer and sold only one “powder.” Jackie asks

if she sold any “chunk.” HyoJung says that she brought them all back and didn't sell any. Jackie says they didn't make good money this month. HyoJung says Sunny picked up 10 “jewelry” and HyoJung returned \$150.

Deponent is informed by PO Kim that PO Kim is familiar with the terms “chunk,” “powder” and “jewelry” with respect to this investigation, and based on his training, experience and the facts and circumstances of this investigation, PO Kim understands the above terms refer to cocaine.

TRANSACTION 1: MAY 6-12, 2013

Tony Yoo (220.16(1), 220.39(1))  
HyoJung (220.16(1), 220.39(1))  
Beige, Nicky, Tae, Sarah, Leah, Jasmine (220.16(1), 220.39(1))  
Beige, Nicky, Tae (230.25(1))  
Beige, Nicky, Tae, Sarah, Leah, Jasmine (230.20(1))

TRANSACTION 2: MAY 13-21, 2013

HyoJung (220.16(1), 220.39(1))  
Beige, Nicky, Tae, Sarah (220.16(1), 220.39(1))  
Beige, Nicky, Tae (230.25(1))  
Beige, Nicky, Tae, Sarah (230.20(1))

Deponent further states that Deponent has reviewed the transcripts to additional conversations, the substance of which are as follows:

- On May 6, 2013, at approximately 1:51 p.m., Sarah asked HyoJung if HyoJung had any. HyoJung said no and Sarah asked HyoJung to order one, to which HyoJung said after 8:00.
- At approximately 2:58 p.m., HyoJung told DEFENDANT Tony Yoo she wants three to which DEFENDANT Tony Yoo said he would call back in the evening.
- At approximately 7:49 p.m., DEFENDANT Tony Yoo told HyoJung that the car is leaving and would be there in ten minutes; at approximately 8:14 p.m., DEFENDANT Tony Yoo told HyoJung that the white car is there.
- At approximately 8:18 p.m., HyoJung told Sarah that HyoJung bought it and Sarah said she would come tomorrow.
- On May 7, 2013, at approximately 12:50 p.m., HyoJung told Sarah she could come now and Sarah said she would go.
- At approximately 12:57 p.m. HyoJung told Sarah that no one was around and Sarah

should come up.

Deponent is informed by PO Kim that based on his training, experience and the facts and circumstances of this investigation, PO Kim understands the references to “any,” “one” and “three” above, are terms that refer to quantities of cocaine that Sarah and HyoJung were purchasing.

Deponent further states that Deponent reviewed additional records for the telephone assigned number (212) 714-1111 and those records indicate that an individual known to the NYPD (“john #1”) placed a call to that number on May 12, 2013 at approximately 12:45 a.m.

- On May 12, 2013, at approximately 12:47 a.m., Beige told Jasmine that she will be going to john #1. At approximately 1:11 a.m., Jasmine tells Beige that it’s going to be \$220 in cash. At approximately 2:03 a.m., Jasmine tells Tae that it will be two hours on two different cards. At approximately 2:09:37 a.m., Jasmine asks co-conspirator Leah for john #1’s pin number. Leah provided it and said it should be the same pin number for Citibank and TD Bank. At approximately 2:12 a.m., Sarah told Jasmine to feed john #1 “SooJaeBi.” Jasmine said he had \$1,000 in cash, and Sarah said Jasmine should get two hours in cash to begin with, to which Jasmine responded that she already did.
- On May 13, 2013, at approximately 4:07 p.m., HyoJung asked if Sarah was coming today and Sarah responded yes. HyoJung asked when Sarah was coming, Sarah said in approximately 30 minutes. At approximately 4:35 p.m. HyoJung told Sarah that she was home and Sarah said that she would make her way there.
- On May 21, 2013, at approximately 12:19 a.m., a prostitute dispatcher known to NYPD told Sarah that Sarah was going on a call, it was a “#2” customer and Sarah should take everything because the customer might do “#1” and add another girl. Later, Sarah called the prostitute dispatcher known to NYPD to give a credit card number and said it is for four hours. The prostitute dispatcher known to NYPD said it was \$1025. At 3:20 a.m., Sarah told Nicky it would be three more hours and Nicky stated \$2,250.

Deponent is informed PO Kim that PO Kim, is familiar with the terms “SooJaeBi,” “#1” and “#2” with respect to this investigation, and based on his training, experience, and the facts and circumstances of this investigation, PO Kim understands the above terms refer to cocaine (specifically, SooJaeBi and #1 refer to “crack” cocaine and #2 refers to powder cocaine).

#### TRANSACTION 3: SEPTEMBER 12-14, 2013

Tony Yoo, Landrum (220.16(1), 220.39 (1))

Beige, Nicky, Tae, Ivy, Megan, Sarah (220.16(1), 220.39(1))

Beige, Nicky, Tae (230.25(1))

Beige, Nicky, Tae, Ivy, Megan, Sarah (230.20(1))

Deponent has reviewed additional transcripts from conversations pursuant to court authorized eavesdropping and those calls stated, in sum and substance:

- On September 12, 2013, at approximately 12:21 a.m., co-conspirator Ivy asked DEFENDANT Tony Yoo if Ivy's coworker could pick up the "merchandise" tomorrow. DEFENDANT Tony Yoo stated that it was okay. Ivy told DEFENDANT Tony Yoo the coworker's name was Megan and that co-conspirator Megan's phone number is 917-805-6905. At approximately 1:14 a.m., DEFENDANT Tony Yoo told Megan that he could not deliver now and asked if he could deliver the next day around 5 o'clock. On September 12, 2013, at approximately 5:32 p.m., Megan asked for one and a half and DEFENDANT Tony Yoo said yes. At approximately 6:10 p.m., DEFENDANT Tony Yoo told Megan that the Burgundy Toyota SUV was there.
- On September 14, 2013, at approximately 2:38 a.m., Beige told Sarah to get credit card information and wanted Megan to give the credit card information. After Megan gave Beige the credit card information, Beige said she would do two hours each which, is \$1,125. Beige also told Megan to take a picture of the customer's ID and credit card and it would be better if Megan photographed the customer signing the receipt. At approximately 2:41 p.m., Sarah asked Beige for the total. Beige stated it was \$1,125. Beige told Sarah to tell the customer to write "I am not going to charge back" on the back of the receipt. Beige further says she told Megan what to do and will accept two hours only because the customer is too risky.

Deponent is informed by PO Kim that PO Kim is familiar with the term "merchandise" with respect to this investigation, and based on his training, experience and the facts and circumstances of this investigation, PO Kim understands the above term refers to cocaine.

Deponent is informed OCTF Investigator Michael Rodriguez, that on September 12, 2013, at approximately 6:10 p.m. Investigator Rodriguez observed Megan enter a Burgundy FJ Cruiser, identified as the vehicle utilized by Landrum to make several drug deliveries. Det. Rodriguez observed her get out of the FJ Cruiser a short time later. Based upon Inv. Rodriguez's training as a narcotics investigator and his familiarity with the facts and circumstances of this investigation, Inv. Rodriguez believes a narcotics transaction transpired in the FJ Cruiser to which Megan was a party.

Deponent further states during the course of this investigation, Deponent learned of the prices and fees that these organizations charged for both prostitution and for narcotics. Based on this knowledge, Deponent states that the \$1,125 charged, as referenced above, was for both prostitution and narcotics.

#### TRANSACTION 4: JULY 8-11, 2013

Tony Yoo, Landrum (220.16(1), 220.39(1))

Jackie, Sara, HyoJung, Jenny, Tina (220.16(1), 220.39(1))

Jackie, Sara, HyoJung, Jenny (230.25(1))

Jackie, Sara, HyoJung, Jenny, Tina (230.20(1))

Deponent further states that Deponent has reviewed additional transcripts from conversations pursuant to court authorized eavesdropping and those calls stated, in sum and substance:

- On July 8, 2013, at approximately 7:25 p.m., DEFENDANT Tony Yoo asked if it was three HyoJung wanted. At approximately 9:26 p.m., DEFENDANT Tony Yoo told HyoJung to come downstairs because he had arrived.
- On July 11, 2013, at approximately 7:59 p.m., Jenny sent a text to co-conspirator Tina which told her to go to the “24 fl”. At approximately 8:39 p.m., Tina sent a text to Jenny stating he’s here but in the bathroom. “Is he party?” To which, Jenny responded “Yeap.” At approximately 9:30 p.m., Tina called Jenny and stated that this john known to the NYPD (“john #2”), wanted to do two more hours; a third hour “for the party” should also be charged on the credit card. John #2 also wanted the cash he had paid “for the party” refunded, as he would pay for that by credit card. Jenny responded by saying the charge would be \$750.

Deponent is informed by PO Kim that PO Kim is familiar with the term “party” with respect to this investigation, and based on his training, experience, and the facts and circumstances of this investigation, PO Kim understands the term “party” is used by these groups, and their johns, as a code word to mean cocaine.

Deponent further states that he reviewed the credit card records of john #2, and observed a \$750 dollar charge from “JHJ2” on July 11, 2013, and a \$500 charge from “3YW” on July 12, 2013.

#### TRANSACTION 5: AUGUST 14-AUGUST 23, 2013

Tony Yoo, Landrum (220.16(1), 220.39(1))

Jackie, Sara, HyoJung, Jenny, Mia (220.16(1), 220.39(1))

Jackie, Sara, HyoJung, Jenny (230.25(1))

Jackie, Sara, HyoJung, Jenny, Mia (230.20(1))

Deponent further states that Deponent has reviewed additional transcripts from conversations pursuant to court authorized eavesdropping and those calls stated, in sum and substance:

- On August 14, 2013, at approximately 4:22 p.m., HyoJung asked DEFENDANT Tony Yoo for three and Tony Yoo said it would be delivered today. At approximately 9:17 p.m., DEFENDANT Tony Yoo told HyoJung that the car is there.
- On August 23, 2013, at approximately 7:17 p.m., Jenny sent a text to co-conspirator Mia instructing Mia to go to the 24<sup>th</sup> floor to meet john #2. At approximately 10:25 p.m., Mia sent a text to Jenny stating that john #2 wanted to extend another two hours. At approximately 9:27 p.m., Mia told HyoJung that Mia got a two hour extension and asked HyoJung for one. HyoJung then said she’ll send two and Mia can bring back

the leftover.

Deponent is informed by PO Kim that PO Kim that based on his training, experience, and the facts and circumstances of this investigation, PO Kim understands the term “three” used by HyoJung in this context referred to three units of cocaine.

TRANSACTION 6: SEPTEMBER 7 –SEPTEMBER 18, 2013

Tony Yoo, Landrum (220.16(1), 220.39(1))

Jackie, Sara, HyoJung, Jenny (220.16(1), 220.39(1), 230.25(1), 230.20(1))

Deponent further states that Deponent has reviewed additional transcripts from conversations pursuant to court authorized eavesdropping and those calls stated, in sum and substance:

- On September 6, 2013, at approximately 7:52 p.m., HyoJung asked DEFENDANT Tony Yoo for three and Tony Yoo said he could do it tomorrow. On September 7, 2013, at approximately 6:18 p.m., Tony told HyoJung that he arrived.
- On September 10, 2013, at approximately 7:04 p.m., Jenny sent a text to Tina stating she would be seeing john #2. At approximately 10:02 p.m., Tina told Jenny that Tina pulled out enough for one hour each, but the customer wanted Tina to pull out five more “party”.

Deponent is informed by PO Kim that PO Kim is a trained narcotics investigator, and based on his training and experience as a narcotics investigator, and the facts and circumstances of this investigation, PO Kim understands the term “party” in this context referred to cocaine and further understands the above reference to “three” to refer to three units of cocaine.

- On September 18, 2013, at approximately 11:10 a.m., Jackie told HyoJung to make sure to pack plenty of jewelry. HyoJung said she did it already. At approximately 6:50 p.m., Sara asked HyoJung what if the girls are looking for drugs later on. HyoJung replied to open the third drawer and take out HyoJung’s clothes. HyoJung says there is a box in the drawer and everything is there including prepared straws. At approximately 7:52 p.m., Jenny instructed an unapprehended other to go to john #3’s location. At approximately 8:37 p.m., Jenny asks if it is two hours and a separate charge for drugs to which the unapprehended other replied yes.

Deponent is informed by PO Kim that PO Kim that based on his training, experience, and the facts and circumstances of this investigation, PO Kim understands the term “jewelry” used in this context referred to cocaine.

TRANSACTION 7: AUGUST 27-SEPTEMBER 17, 2013

Tony Yoo, Landrum (220.16(1), 220.39(1))

Dada (220.16(1), 220.39(1), 230.20(1))

Deponent further states that Deponent has reviewed additional transcripts from conversations

pursuant to court authorized eavesdropping and those calls stated, in sum and substance:

- On August 27, 2013, at approximately 6:11 p.m., co-conspirator Dada asked DEFENDANT Tony Yoo about the half that she bought for \$750 and further asked if DEFENDANT Tony Yoo could bring a half by 9:00. At approximately 8:07 p.m., DEFENDANT Tony Yoo told Dada to meet at 36<sup>th</sup> Street between 5<sup>th</sup> and 6<sup>th</sup> Avenues by the steakhouse. At approximately 10:00 p.m., Dada said she received the coffee but asked why it is not in chunk form but rather is ground. DEFENDANT Tony Yoo told Dada not speak about that on the telephone.

Deponent is informed by PO Kim based on his training, experience, and the facts and circumstances of this investigation, PO Kim understands the term “coffee” used in this context referred to cocaine, and they were discussing crack versus powder form (“chunk” versus “ground”).

- On September 13, 2013, at approximately 10:30 p.m., Dada spoke to an unapprehended other about receiving 220 for one hour from a person known to the NYPD (“john #3”).
- On September 17, 2013, at approximately 9:45 p.m., Dada stated to an unapprehended other that a customer wanted the girl now. Dada told the unapprehended other to take party just in case and provided the address. On September 18, 2013, at approximately 2:24 a.m., unapprehended other stated that she can’t remember how many parties she sold. She further stated she had two left and sold five; two of her own and three of Dada’s.

Deponent is informed by PO Kim that based on his training, experience, and the facts and circumstances of this investigation, PO Kim understands the term “party” used in this context referred to cocaine.

Deponent further states that Deponent reviewed the business records for the companies owned or managed by Beige, Nicky, and Tae and those records indicated that their businesses, for the purpose of processing credit card transactions, purported to be a clothing wholesaler, limousine service and/or dating and escort service. Records for the business owned or managed by Jackie, Sara, HyoJung and Jenny for the same purpose reflect their businesses to be clothing wholesaler, wig wholesaler, limousine service, and/or beauty supply wholesaler.

Deponent is informed by OCTF Investigator Rachel Muzichenko that she reviewed records of the above businesses owned, operated and managed by Beige, Nicky, Tae, Jackie, Sara, HyoJung, and Jenny for the period of November 19, 2012 through October 18, 2013, and observed that during this period, these companies received payments from credit card charges that correspond to the payments they obtained from johns for sex and drugs as described in the preceding paragraphs, which disguised the actual source of the funds, and further, that these proceeds were ultimately deposited into other accounts owned or managed



by Beige, Nicky Tae, Jackie, Sara, HyoJung and Jenny, further obscuring the source of the funds. Deponent is further informed by Investigator Muzichenko that these transactions exceeded \$100,000.

False statements made herein are punishable as a Class A misdemeanor pursuant to Penal Law Section 210.45

DATE: January 29, 2014  
City of New York  
New York County, New York

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Det. Walter Harkins, Shield 2013, New York Police Department