

State of Minnesota  
County of Hennepin

District Court  
4th Judicial District

Prosecutor File No. 17A03494  
Court File No. 27-CR-17-12407

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**State of Minnesota,**

Plaintiff,

vs.

**SONAM TSERING DOB: 02/21/1981**

885 LONG POND RD  
PLYMOUTH, MA 02360

Defendant.

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**COMPLAINT**

Warrant

The Complainant submits this complaint to the Court and states that there is probable cause to believe Defendant committed the following offense(s):

**COUNT I**

**Charge: Promotes Prostitution of an Individual**

Minnesota Statute: 609.322.1a(2), with reference to: 609.322.1(b)(4), 609.322.1a

Maximum Sentence: 25 YEARS AND/OR \$60,000

Offense Level: Felony

Offense Date (on or about): 11/01/2016

Control #(ICR#): 16010120

Charge Description: That on or about the time period from November 1, 2016 through January 3, 2017, in Hennepin County, Minnesota, SONAM TSERING, while acting other than as a prostitute or patron, did intentionally promote the prostitution of an individual, and the offense involved more than one sex trafficking victim.

**COUNT II**

**Charge: Receives Profits From Prostitution**

Minnesota Statute: 609.322.1a(3), with reference to: 609.322.1(b)(4), 609.322.1a

Maximum Sentence: 25 YEARS AND/OR \$60,000

Offense Level: Felony

Offense Date (on or about): 11/01/2016

Control #(ICR#): 16010120

Charge Description: That on or about the time period from November 1, 2016 through January 3, 2017, in Hennepin County, Minnesota, SONAM TSERING, received profit knowing or having reason to know that it was derived from prostitution, or the promotion of the prostitution, of an individual, and the offense involved more than one sex trafficking victim.

**COUNT III**

**Charge: Engages in the sex trafficking of an individual**

Minnesota Statute: 609.322.1a(4), with reference to: 609.322.1(b)(4), 609.322.1a

Maximum Sentence: 25 YEARS AND/OR \$60,000

Offense Level: Felony

Offense Date (on or about): 11/01/2016

Control #(ICR#): 16010120

Charge Description: That on or about the time period from November 1, 2016 through January 3, 2017, in Hennepin County, Minnesota, SONAM TSERING, engaged in the sex trafficking of an individual, Victim 1, and the offense involved more than one sex trafficking victim.

**COUNT IV**

**Charge: Engages in the sex trafficking of an individual**

Minnesota Statute: 609.322.1a(4), with reference to: 609.322.1(b)(4), 609.322.1a

Maximum Sentence: 25 YEARS AND/OR \$60,000

Offense Level: Felony

Offense Date (on or about): 11/01/2016

Control #(ICR#): 16010120

Charge Description: That on or about the time period from November 1, 2016 through January 3, 2017, in Hennepin County, Minnesota, SONAM TSERING, engaged in the sex trafficking of an individual, Victim 2, and the offense involved more than one sex trafficking victim.

## STATEMENT OF PROBABLE CAUSE

Complainant has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

On November 1, 2016, officers were investigating prostitution crimes in Hennepin County, Minnesota. They came across an advertisement on Backpages.com for an apparent Asian prostituted woman. The officers had dealt with several Asian Human Trafficking Organizations (“AHTO”) and this one appeared to be set up the same way. Officers called the number from the advertisement and were directed to a call center, who then directed them to the actual location of the victim.

With the first advertisement, the officers were directed to an apartment in the City of Edina, Hennepin County, Minnesota. Upon arrival at the apartment, one of the officers was met by an identified adult female (“Victim 1”), who was dressed in lingerie. The officer identified himself as police and showed Victim 1 his badge. While police were present, another male arrived and admitted he was there to visit Victim 1.

Victim 1 only spoke Chinese, so a translation service was used to communicate with her. Victim 1 said she was from China but lives in New York. Victim 1 engages in prostitution to save money for medical issues. Victim 1 showed the officer a large medical scar down her spine. Victim 1 said she earned approximately \$1,000 through prostitution. Victim 1 was transported from New York to Minnesota for the sole purpose to be a prostitute and had to give a large portion of her earnings to the AHTO.

Over the course of approximately one month, officers conducted an investigation using surveillance, traffic stops, and other methods to help identify individuals involved in this AHTO. One of the persons was identified as Defendant, SONAM TSERING [(D.O.B. 2/21/1981); (“Tsering”)].

On November 16, 2016, after officers had shut down the Edina location, officers watched an associate of Tsering and another male as they began moving items out of the Edina apartment directly to another apartment in Richfield, Hennepin County, Minnesota. The Richfield apartment was rented using the same stolen identity as the Edina apartment.

On December 28, 2016, officers watched Tsering walk out of the Richfield apartment building with a garbage bag and place it in the dumpster. Officers found multiple condom wrappers and tissues with apparent bodily fluids in the bag.

Video surveillance in the common hallway of the Richfield apartment building showed 10-12 men coming to the apartment in one day. The video surveillance also captured Tsering coming to the apartment and using a key to open the door.

On January 3, 2017, officers responded to another Backpages.com prostitution advertisement and were directed to the Richfield apartment. Upon arrival, the officer was met by an identified adult female (“Victim 2”). Victim 2 also reported engaging in prostitution. She identified Tsering as the man who lived with her and the person who collected money from her. Victim 2 said she takes customers all day and night. The customer pays her money, she uses condoms which are provided to her, and then she pays Tsering and Tsering is supposed to pass the money along to someone else in the AHTO. Victim 2 is supposed to be pay \$50 for every \$140 she makes. The men pay \$180 for an hour or \$140 for a half hour.

Tsering was interviewed with the help of an interpreter. Tsering admitted to getting paid for taking care of the prostituted women and that he collected money from them as well. Tsering said he collects \$50 for every \$140 the women made and \$80 for every \$180 she made. Every night, the women were supposed to

put the money in a box. There was \$3,000 in the box from the last two weeks. Tsering also admitted to picking up Victim 2 from the airport and bringing her to the Richfield apartment. Tsering said he worked for a person he only knew as "Jack." Tsering said the box of approximately 500 condoms that police found were sent to him by Jack. Tsering also discussed being a 10% owner in a restaurant in Maple Grove which he has put \$10,000 into.

Tsering's bank records showed cash deposits of \$19,870 in less than five months. The account balance for this account was only \$123.76 on December 29, 2016.

An associate of Defendant, who is another suspected member of the AHTO and who helped move everything from the Edina apartment directly to the Richfield apartment, had large bank deposits totaling \$52,334.03 in less than five months. That total did not even include deposits under \$1,000 that were made during that same time period. There was \$7,000 in checks to Tsering from this associate's account and various other cash withdrawals totaling \$19,000. The account balance on that account was only \$160.01 on December 13, 2016.

Tsering was known to have visited California with another suspected member of the AHTO during this investigation. Given Tsering's resources, his ties to an organization that repeatedly flies people across state lines and internationally for illicit purposes, and the seriousness of these charges, the State is requesting a warrant.

**BLAKELY NOTICE:** The State will be seeking an aggravated sentence based on the facts contained in this complaint and evidence provided during discovery, on the grounds of Minn. Stat. Section 609.322, subdivision 1(b)(4) (the offense involved more than one sex trafficking victim) and Minn. Sent. Guidelines 2.G.9 (noting the added penalty of 48 months to the standard guidelines sentence).

## SIGNATURES AND APPROVALS

Complainant requests that Defendant, subject to bail or conditions of release, be:  
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or  
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

Complainant declares under penalty of perjury that everything stated in this document is true and correct. Minn. Stat. § 358.116; Minn. R. Crim. P. 2.01, subds. 1, 2.

**Complainant**

Matthew Heinzmann  
Detective  
1800 W Old Shakopee Road  
Bloomington, MN 55431  
Badge: 254

Electronically Signed:  
05/19/2017 01:57 PM  
Hennepin County, MN

Being authorized to prosecute the offenses charged, I approve this complaint.

**Prosecuting Attorney**

Justin Wesley  
300 S 6th St  
Minneapolis, MN 55487  
(612) 348-5550

Electronically Signed:  
05/19/2017 10:45 AM

**FINDING OF PROBABLE CAUSE**

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense(s).

**SUMMONS**

THEREFORE YOU, THE DEFENDANT, ARE SUMMONED to appear on \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ AM/PM before the above-named court at 300 S Sixth Street, Minneapolis, MN 55487 to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

**WARRANT**

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I order, in the name of the State of Minnesota, that the Defendant be apprehended and arrested without delay and brought promptly before the court (if in session), and if not, before a Judge or Judicial Officer of such court without unnecessary delay, and in any event not later than 36 hours after the arrest or as soon as such Judge or Judicial Officer is available to be dealt with according to law.

*Execute in MN Only*                       *Execute Nationwide*                       *Execute in Border States*

**ORDER OF DETENTION**

Since the Defendant is already in custody, I order, subject to bail or conditions of release, that the Defendant continue to be detained pending further proceedings.

Bail: \$250,000.00  
Conditions of Release:

This complaint, duly subscribed and sworn to or signed under penalty of perjury, is issued by the undersigned Judicial Officer as of the following date: May 19, 2017.

**Judicial Officer**                      Jeannice M. Reding                      Electronically Signed: 05/19/2017 02:37 PM  
District Court Judge

Sworn testimony has been given before the Judicial Officer by the following witnesses:

**COUNTY OF HENNEPIN  
STATE OF MINNESOTA**

**State of Minnesota**

Plaintiff  
vs.

**SONAM TSERING**

Defendant

*LAW ENFORCEMENT OFFICER RETURN OF SERVICE  
I hereby Certify and Return that I have served a copy of this Warrant  
upon the Defendant herein named.*

Signature of Authorized Service Agent: