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**IN THE THIRD JUDICIAL DISTRICT COURT,
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH**

<p>STATE OF UTAH, Plaintiff, vs. REZVAN SAISANI DOB: 02/02/1965, and SAMEER SYED DOB: 10/12/1990, Co-Defendants.</p>	<p>CUSTODY STATUS: OUT OF CUSTODY INFORMATION Attorney General Report #2020-40 Case No. <u>201904716</u> Case No. <u>201904702</u> Judge: <u>L. Douglas Hogan</u></p>
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The undersigned, Special Agent J. Shuler, Utah Attorney General’s Office, states on information and belief that the above-listed defendant, **SAMEER SYED** and REZVAN SAISANI committed the following crimes:

COUNT 1: PATTERN OF UNLAWFUL ACTIVITY, Utah Code Ann. Section 76-10-1603, a Second Degree Felony, as follows: That on or about and between August 1, 2019 and April 20, 2020, in Salt Lake County, State of Utah, the defendants, **REZVAN SAISANI** and **SAMEER SYED**:

- (1) Did receive proceeds derived, whether directly or indirectly, from a pattern of unlawful activity in which he participated as a principal, and did use or invest directly or indirectly, any part of that income, or the proceeds of the income, or the proceeds

derived from the investment or use of those proceeds, in the acquisition of any interest in, or the establishment or operation of, any enterprise;

- (2) Through a pattern of unlawful activity did acquire or maintain, directly or indirectly, an interest in or control of an enterprise;
- (3) While employed by or associated with an enterprise, did conduct or participate, whether directly or indirectly, in the conduct of that enterprise's affairs through a pattern of unlawful activity; or
- (4) Did conspire to violate any of the above provisions;

and the unlawful activity included three or more violations, whether charged or uncharged, of Exploitation of Prostitution, U.C.A. 76-10-1305; Aiding Prostitution, U.C.A. 76-10-1304; and Money Laundering, U.C.A. 76-10-1903, which episodes were not isolated, but were similar in purpose, results, participants, victim, or methods of commission, or otherwise were interrelated by distinguishing characteristics, to wit: the defendants owned and operated a Motel where commercial sex work is commonplace. The defendants provided accommodation knowing such accommodations were being used for commercial sex work and collected payments both from commercial sex workers and commercial sex purchasers, knowing they were the proceeds of illegal activity.

COUNT 2: MONEY LAUNDERING, Utah Code Ann. Section 76-10-1903, a Second Degree Felony, as follows: That on or about and between August 1, 2019 and April 20, 2020 in Salt Lake County, State of Utah the defendants, **REZVAN SAISANI** and **SAMEER SYED**, transported, received or acquired property which is in fact proceeds of unlawful activity, knowing that the property involved represented proceeds from some form of unlawful activity, and/or conducted a transaction knowing the property involved in the transaction represents proceeds of some form of unlawful activity with the intent to promote the unlawful activity or to conceal or disguise the nature, location, source, ownership or control of the property.

COUNT 3: EXPLOITING PROSTITUTION, Utah Code Ann. Section 76-10-1305, a Third Degree Felony, as follows: That on or about August 1, 2019 and April 20, 2020, in Salt Lake County, State of Utah, the defendants, **REZVAN SAISANI** and **SAMEER SYED** did procure an individual for a place of prostitution; encourage, induce, or otherwise purposely cause another to become or remain a prostitute; transport an individual into or within the state with a purpose to promote that individual's engaging in prostitution or procuring or paying for transportation with that purpose; not being a child or legal dependent of a prostitute, share in the proceeds of prostitution with a prostitute, or an individual the actor believes to be a prostitute, pursuant to their understanding that the actor is to share therein; or own, control, manage, supervise, or otherwise keep, alone or in association with another, a place of prostitution or a business where prostitution occurs or is arranged, encouraged, supported, or promoted.

COUNT 4: EXPLOITING PROSTITUTION, Utah Code Ann. Section 76-10-1305, a Third Degree Felony, as follows: That on or about and between August 1, 2019 and April 20, 2020, in

Salt Lake County, State of Utah, defendants, **REZVAN SAISANI** and **SAMEER SYED**, did procure an individual for a place of prostitution; encourage, induce, or otherwise purposely cause another to become or remain a prostitute; transport an individual into or within the state with a purpose to promote that individual's engaging in prostitution or procuring or paying for transportation with that purpose; not being a child or legal dependent of a prostitute, share in the proceeds of prostitution with a prostitute, or an individual the actor believes to be a prostitute, pursuant to their understanding that the actor is to share therein; or own, control, manage, supervise, or otherwise keep, alone or in association with another, a place of prostitution or a business where prostitution occurs or is arranged, encouraged, supported, or promoted.

COUNT 5: EXPLOITING PROSTITUTION, Utah Code Ann. Section 76-10-1305, a Third Degree Felony, as follows: That on or about and between August 1, 2019 and April 20, 2020, in Salt Lake County, State of Utah, the defendants, **REZVAN SAISANI** and **SAMEER SYED**, did procure an individual for a place of prostitution; encourage, induce, or otherwise purposely cause another to become or remain a prostitute; transport an individual into or within the state with a purpose to promote that individual's engaging in prostitution or procuring or paying for transportation with that purpose; not being a child or legal dependent of a prostitute, share in the proceeds of prostitution with a prostitute, or an individual the actor believes to be a prostitute, pursuant to their understanding that the actor is to share therein; or own, control, manage, supervise, or otherwise keep, alone or in association with another, a place of prostitution or a business where prostitution occurs or is arranged, encouraged, supported, or promoted.

COUNT 6: MAINTAINING A PUBLIC NUISANCE, Utah Code Ann. Section 76-10-804, a Class B Misdemeanor, as follows: That on or about and between August 1, 2019 and April 20, 2020, in Salt Lake County, State of Utah, the defendant, **REZVAN SAISANI**, did maintain or commit any public nuisance, or willfully omit to perform any legal duty relating to the removal of a public nuisance, as defined in U.C.A. 76-10-803(1).

NOTICE OF FORFEITURE UNDER THE UTAH UNIFORM FORFEITURE PROCEDURES ACT

In accordance with Title 24, Chapter 4, Utah Code as amended, property of the Defendant has been seized and said property is believed to be subject to criminal forfeiture as proceeds of criminal conduct, to wit: Exploiting, Aiding, and Abetting Prostitution pursuant to Title 76, Chapter 10, Part 13, Utah Code as amended, as follows:

\$1, 826.00 U.S. currency seized from the defendant's place of business, City Inn Motel at 1025 North 900 West, Salt Lake City, UT, on February 6, 2020, believed to be proceeds of exploiting, aiding, and abetting prostitution in violation of Utah Code Annotated Title 76, Chapter 10, Part 13, Prostitution.

DECLARATION OF PROBABLE CAUSE:

This INFORMATION is based upon evidence from Attorney General's Report 2020-40 and witness statements as indicated:

During summer of 2019 Agents with the Attorney General's SECURE Task Force received multiple tips through confidential sources that the Salt City Inn Motel (City Inn) located at 1025 N. 900 W. in Salt Lake City was being used for commercial sex and drug trafficking. Upon receipt of these tips from multiple sources, a joint investigation between the Investigative Division of the Attorney General's Office and the Salt Lake City Police Department Organized Crime and Narcotics Units was initiated. During that investigation, officers conducted physical surveillance, undercover operations with commercial sex workers, undercover operations with officers posing as commercial sex workers and commercial sex purchasers, and confidential informant drug buys.

Rezvan "Ray" SAISANI (DOB: 02/02/1965) was identified as the Owner and Operator of City Inn; Sameer SYED (DOB: 10/12/1990) was identified as the Manager of City Inn working closely with SAISANI. Agents received multiple tips that SAISANI and SYED were not only aware of the City Inn property being used for commercial sex and drug trafficking, but SAISANI and SYED encouraged such activity in order to benefit financially. Agents were informed that SYED and SAISANI collected "visitor fees" from every party visiting a commercial sex worker at the City Inn. Agents were told that fee was a minimum of \$10.00 and was paid directly to SAISANI or SYED by any party coming onto the City Inn property to engage in a transaction with one of the commercial sex workers residing long term at the City Inn. Agents were also told that SAISANI and SYED would proposition the commercial sex workers to receive free rent in exchange for engaging in various forms of sexual activity with SAISANI and SYED.

Ongoing surveillance of City Inn Motel and the undercover operations corroborated the information received by agents. While conducting physical surveillance of City Inn, two agents were approached by SAISANI. SAISANI asked the agents which female (in reference to females engaging in commercial sex work) they were there to visit and SAISANI then informed the agents they should meet SAISANI on the North side of the business as the better "girls" were located there. During one undercover operation, a female undercover officer posing as a commercial sex worker was told by SAISANI that any party coming onto the property to see her would have to pay a \$10.00 fee. SAISANI later told a male undercover officer posing as a commercial sex purchaser that in order to visit the female undercover officer he would have to pay the \$10.00 fee. When the male undercover officer informed SAISANI he would only be on the property for an hour, SAISANI informed him it did not matter, and he would still need to pay the \$10.00 fee. Similarly, in a separate undercover interaction, SYED informed a male undercover officer posing as a commercial sex purchaser that he was also required to pay a \$10.00 fee after visiting a female undercover officer posing as a commercial sex worker.

As a result of the joint investigation, Agents sought and obtained six search warrants for rooms and locations at the City Inn. Those warrants were executed on February 6, 2020. Three long term residents of the City Inn were arrested and transported the Salt Lake Metro Jail, each charged with drug distribution and possession offenses. All three of those parties have pled guilty to drug charges and are awaiting sentencing. The Health Department served notice on City Inn that multiple rooms on the property would be condemned until further notice due to methamphetamine contamination. During the execution of those warrants, a room near the Main

Office area, exclusively used by SAISANI, was searched and Agents recovered condoms, lubricants, and electronics.

After the execution of those search warrants, agents and investigators interviewed numerous long-term residents of the City Inn. N.T., a known and admitted commercial sex worker residing at City Inn at the time of the execution of those warrants, was interviewed by agents. N.T. told agents that SAISANI and SYED were both aware of her engaging in commercial sex work at City Inn and encouraged such activity. N.T. told investigators SAISANI and SYED knew she was engaged in commercial sex, because she had previously shown them her online ads and she had an agreement with SAISANI and SYED that her visitors would pay their \$10.00 fee after the fact so that SAISANI and SYED would not scare them off. N.T. told investigators she had personally been propositioned by SAISANI who offered her free rent at City Inn in exchange for sex. N.T. told investigators that any time she had a “trick” (slang for the individual engaging in sexual activity with a commercial sex worker) come to her residence at City Inn they would be charged a minimum of \$10.00 by SAISANI or SYED and one of her “tricks” had been charged \$70.00 by SYED over a 2.5 hour period.

O.K., a known and admitted commercial sex worker previously residing at City Inn, was interviewed by agents. O.K. told investigators that SAISANI would provide her with a room at City Inn without payment up front, knowing that O.K. would pay for the room after engaging in commercial sex. O.K. told investigators that the amount of rent expected by SAISANI under that agreement was dependent on how much she made from a “trick.” The rental rate would increase in correlation to the amount O.K. received in exchange for commercial sex acts. O.K. told investigators any time SAISANI gave her a room without her paying up front it was because SAISANI knew O.K. had a client on the way. SAISANI would ask much she was charging the client, and how quickly O.K. could pay SAISANI. O.K. told investigators that SYED offered her a room rent-free in exchange for “sexual favors,” but O.K. declined.

A.C., a known and admitted commercial sex worker residing at City Inn at the time of the execution of those warrants, was interviewed by agents. A.C. told investigators that SAISANI and SYED are both fully aware that the long-term residents of City Inn are either commercial sex workers, drug dealers, or drug addicts. A.C. told investigators any time she has a client meeting her for commercial sex at City Inn that client is required to pay SAISANI a \$10.00 fee. A.C. told investigators that SAISANI and SYED know A.C. is a commercial sex worker. A.C. told investigators that SYED has gone so far as to unlock the door to her room and demand money from her while she is completely naked and with a client. A.C. told investigators that SYED is aggressive with female commercial sex workers on the property and has been known to throw them off the property if they refuse to perform oral sex on him. A.C. told investigators that it was common practice for SAISANI or SYED to call her room and let her know that her clients were at the front desk and they were good to go to her room.

During execution of those search warrants at City Inn, investigators recovered numerous registration cards for residence and parties checking into City Inn. Many of those cards contained the names of known commercial sex works and showed different men checking them into the City Inn. Investigators also located three registration logs dated February 5, 2020, which showed a “V-fee” written next to several rooms and showed a cash payment of \$10.00.

There is substantial danger of a breach of the peace, injury to persons or property, or danger to the community, based on the conduct alleged herein as well as the Defendants' continued criminal conduct at the City Inn and continued association with others engaged in criminal activity. In addition, Defendant SAISANI has significant financial resources should he choose to flee the jurisdiction. For the above reasons, it is reasonable to believe that he would not otherwise appear on a summons.

Pursuant to Utah Code Ann. Section 78B-18a-106 (2018), I declare under criminal penalty under the law of Utah that the foregoing is true and correct.

Signed on the 21st day of APRIL 2020, at Salt Lake County, Utah.

/s/ Joe Shuler
SPECIAL AGENT J. SHULER

Authorized for presentment and filing on April 21, 2020.

SEAN D. REYES
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/s/ Kaytlin V. Beckett
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