

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JUN YUN ZHANG,  
a/k/a "Lao Sze"  
and the defendants on the attached list

CRIMINAL COMPLAINT  
CASE NUMBER:

UNDER SEAL

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. From in or about at least 2003, and continuing to the present, in the Northern District of Illinois, Eastern Division, defendants herein,

did knowingly and intentionally conspire with each other and others, to transfer, possess, or use, means of identification, namely social security numbers of other persons which were issued by or under the authority of the United States, without lawful authority, with the intent to commit, or to aid or abet, or in connection with, an unlawful activity constituting a violation of federal law, namely, Title 42, United States Code, Section 408(a)(7)(B), and Illinois law, namely, 625 ILCS 5/6-302, contrary to Title 18, United States Code, Section 1028(a)(7),

all in violation of Title 18 United States Code, Section 1028(f) and 2.

I further state that I am a(n) Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

See Attached Affidavit

Continued on the attached sheet and made a part hereof:  Yes  No

\_\_\_\_\_  
Signature of Complainant  
DAVID A. PATCH  
Special Agent, Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

\_\_\_\_\_  
Date

at Chicago, Illinois  
City and State

\_\_\_\_\_  
Michael T. Mason  
U.S. MAGISTRATE JUDGE

\_\_\_\_\_  
Signature of Judicial Officer

2. **JUN YUE ZHANG**, a/ka “Lao San”;
3. **JUN XI ZHANG**, a/k/a “Lao Wu”;
4. **JUN SHUN ZHANG**, a/k/a “Mikey”;
5. **DONG DONG GUO**, a/k/a “Xiao Zhang”;
6. **GUOQI ZHANG**;
7. **TIANSHENG ZHANG**;
8. **XIN LI WANG** a/k/a “Tony”;
9. **MEIZHU WANG**;
10. **YIYI SHI**, a/k/a “YiYi” a/k/a “Huati”;
11. **SONG YAN SHI**;
12. **WENYUAN ZHOU**;
13. **YONGHUI WANG**;
14. **ZHAOFA WANG**;
15. **QIONG ZHOU**;
16. **TIMOTHY T. JOHNSON JR.**;
17. **JAMES M. HOWELL.**

STATE OF ILLINOIS     )  
  )  
COUNTY OF COOK     )       SS

**A F F I D A V I T**

I, David A. Patch, hereinafter referred to as "Affiant," being duly sworn under oath, state as follows:

**I.     PRELIMINARY MATTERS**

1.     I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by law to conduct investigations and to make arrests for felony offenses as enumerated in Title 18, United States Code, Section 2516.

2.     I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI"), United States Department of Justice and have been so employed for approximately ten years. I am currently assigned to the Asian/Eurasian Criminal Enterprise Squad of the Chicago Division of the FBI. As part of my official duties, I investigate criminal violations of federal laws, including, but not limited to Title 18, United States Code, Sections 1028, 1543, 1544 and 1951, which prohibit, among other things, the manufacture, sale, and alteration of fraudulent personal identification documents as well as interfering with commerce through extortion. I have received specialized training in the investigation and prosecution of Asian criminal enterprises and their involvement in the manufacture and sale of fraudulent identification documents. I have been involved in various types of electronic surveillance, physical surveillance and in the debriefing of defendants, witnesses and confidential sources, and have worked and spoken with other law enforcement officers who are knowledgeable about Asian criminal enterprises which are involved in the illegal manufacture, sale, and distribution of altered and fraudulent personal identification documents.

3. This Affidavit is made for the limited purposes of establishing probable cause in support of:

a. A Criminal Complaint charging that defendants: JUN YUN ZHANG, a/k/a “Lao Sze”; JUN YUE ZHANG, a/k/a “Lao San”; JUN XI ZHANG, a/k/a “Lao Wu”; JUN SHUN ZHANG, a/k/a “Mikey”; DONG DONG GUO, a/k/a “Xiao Zhang”; GUOQI ZHANG; TIANSHENG ZHANG; XIN LI WANG a/k/a “Tony”; MEIZHU WANG; YIYI SHI, a/k/a “YiYi” a/k/a “Huati”; SONG YAN SHI; WENYUAN ZHOU; YONGHUI WANG; ZHAOFA WANG; QIONG ZHOU; TIMOTHY T. JOHNSON JR.; and JAMES M. HOWELL, did knowingly and intentionally conspire with each other and others, to transfer, possess, or use, means of identification, namely social security numbers of other persons which were issued by or under the authority of the United States, without lawful authority, with the intent to commit, or to aid or abet, or in connection with, an unlawful activity constituting a violation of federal law, namely, Title 42, United States Code, Section 408(a)(7)(B), and of Illinois law, namely, 625 ILCS 5/6-302, contrary to Title 18, United States Code, Section 1028(a)(7), all in violation of Title 18 United States Code, Section 1028(f);

b. Criminal Complaints charging that defendants LI WEN HUANG and RONG SI, did knowingly possess and use, without lawful authority, a means of identification of another person, namely social security numbers of other persons which were issued by or under the authority of the United States, with the intent to commit, or to aid or abet, or in connection with, commission of a violation of federal law, namely, Title 42, United States Code, Section 408(a)(7)(B), and Illinois law, namely 625 ILCS 5/6-302, all in violation of Title 18 United States Code, Section 1028(a)(7).

c. Obtaining Search Warrants at the following locations (as more fully described below and in referenced attachments):

- i. 2734 S. Wentworth Avenue, Unit 310, Chicago, Illinois more fully described in Attachment A-1;
- ii. 2734 S. Wentworth Avenue, Unit 408, Chicago, Illinois, more fully described in Attachment A-2;
- iii. 260 West 24<sup>th</sup> Place, Unit 1-Rear, Chicago, Illinois, more fully described in Attachment A-3; and
- iv. 2925 South Wells Street, Chicago, Illinois, more fully described in Attachment A-4 (hereinafter, collectively referred to as "Search Residences").

4. The information in this Affidavit is based upon interviews of witnesses, my own observations and actions, information received from other law enforcement agents and officers, my experience and training, and the experience of other agents and officers, information from confidential sources and undercover law enforcement officers, consensual recordings of telephone calls and in-person meetings with subjects of the investigation, surveillance by law enforcement officers of subjects of the investigation and records obtained during the course of the investigation. Further, the information in this Affidavit is also based upon a review of intercepted wire communications which were obtained pursuant to Court Order. Since this Affidavit is being submitted for the limited purposes of securing Criminal Complaints and Search Warrants as indicated above, I have not included each and every fact known to me concerning this investigation. More specifically, I have set forth only the facts that I believe are necessary to establish a foundation of probable cause to support the requested Criminal Complaints and Search Warrants.

## **II. OVERVIEW OF THE INVESTIGATION**

**A. General Summary**

5. Based upon the investigation to date, my training, experience and involvement in debriefing defendants, witnesses, and confidential sources as well as my consultation with other law enforcement officers who have conducted investigations of Asian criminal enterprises, I know the following:

a. Chinese criminal enterprises frequently establish well coordinated operations whereby nationals from the People's Republic of China ("PRC") are smuggled, for a fee, into the United States ("U.S.") via a variety of different techniques. Upon entering the U.S., these Chinese nationals frequently seek out and prepare to reside in ethnically similar communities, namely the well established "Chinatown" communities located in various large cities to include Atlanta, Boston, Chicago, Los Angeles, New York and San Francisco, among others. Although illegally residing in the U.S., these Chinese nationals often attempt to obtain employment, housing, utility services, driver's licenses as well as credit card and banking accounts in furtherance of assimilating into life in the U.S.

b. Chinese nationals who are illegally residing in the U.S. often seek to obtain altered or fraudulent personal identification documents, under alias identities, in furtherance of avoiding detection by U.S. immigration authorities and in furtherance of obtaining employment, housing, utility services and credit card and banking services. Social security account cards are routinely sought, due to the fact that many employers require a worker to possess a valid social security account number. Additionally, these Chinese nationals seek to utilize fraudulently obtained social security account numbers for a variety of other purposes, to include applying for and opening credit card and banking accounts as well as to support applications for state issued driver's licenses

or identification cards.

c. As part of a typical fraudulent document operation, an undocumented foreign national "customer" will usually coordinate with a "broker"<sup>1</sup> to obtain fraudulent personal identification documents and, in furtherance of that process, will provide a personal passport photograph to the broker. In turn, this broker will coordinate with a "manufacturer"<sup>2</sup> who will alter a counterfeit or authentic PRC passport to contain the customer's photograph and will manufacture a new biographical page for the passport to match the identity associated with an authentic social security account card for a third party. Further, these brokers and their associated "couriers"<sup>3</sup> provide instruction to customers relative to using an altered PRC passport, social security account card and a fraudulent bank statement, utility service statement or postmarked envelope<sup>4</sup> to obtain a state issued driver's license or identification card.

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<sup>1</sup> The term "broker" is utilized to designate an individual that often advertises, via customer referrals or through published newspapers, his or her ability to obtain various forms of altered or fraudulent personal identification documents. Further, a broker will commonly coordinate all arrangements with a prospective customer who is seeking to purchase such documents. Typically, a broker will conduct all negotiations relative to the fees which are to be paid by the customer.

<sup>2</sup> The term "manufacturer" is utilized to designate an individual that has the knowledge and ability to physically alter, produce or manufacture various forms of fraudulent personal identification documents.

<sup>3</sup> The term "courier" is utilized to designate an individual that, at the direction of a broker or manufacturer, routinely transports customers from public transportation facilities, or other locations, to various locations in order to obtain passport photographs, altered and fraudulent documents as well as to state operated driver's license/identification card issuing facilities. Often times, couriers quickly develop their own customers and essentially take on the role of a broker.

<sup>4</sup> Such fraudulent bank statements, utility service statements or postmarked envelopes are utilized and commonly accepted as a means of demonstrating residency for the purposes of obtaining a state issued driver's license or identification card. In some instances, the addresses utilized on these fraudulent proofs of residency will be valid, but often the addresses will be fictitious.

d. Commonly, brokers or couriers will advertise their ability to assist customers with obtaining such fraudulent personal identification documents in regional or national foreign language newspapers which are circulated within smaller ethnic communities.

e. According to representatives of the Illinois Secretary of State, in the State of Illinois, a foreign national may obtain a driver's license based upon presentation of a foreign passport, social security account card, proof of residency, proof of insurance and upon successful completion of the Illinois Secretary of State ("ISOS") Driver's License Written Examination and the ISOS Vehicle Road Test as administered by ISOS employees at various ISOS Driver Services Facilities.

## **B. Overview of the Investigation**

6. In approximately late 2005, the Chicago Division of the FBI and the Chicago Police Department ("CPD") initiated independent investigations into the manufacture and sale of altered and fraudulent personal identification documents, to include passports from the PRC and social security account cards, within Chicago's Chinatown community. In approximately November of 2007, these two investigations were merged into a joint investigation which also involved the Illinois Secretary of State, Office of the Inspector General ("ISOS/OIG").

7. As more fully set forth in this Affidavit, law enforcement has investigated a criminal enterprise which is involved with selling "identity sets" to predominately Chinese, Korean and Indonesian nationals who have been illegally smuggled into the U.S. An identity set essentially consists of an altered PRC passport which is biographically matched to an authentic social security account of a third party and also includes an authentic Illinois driver's license and/or identification card, also biographically matched to the PRC passport and social security card. In relation to the

sale of these identity sets, this criminal enterprise makes extensive use of authentic social security account cards which have account numbers that begin with the prefix, "586."<sup>5</sup> Further investigation of the social security account cards utilized by this criminal enterprise has revealed that a large portion of the cards were originally obtained, through legitimate means, by Chinese nationals temporarily working in Saipan. Upon the return of these temporary workers to the PRC or while still in Saipan, their issued social security account cards were collected and transported in bulk to the U.S. for eventual use by this criminal enterprise. According to SSA-OIG, given that the original holders of these social security account cards remain in the PRC, the illegitimate use of such cards and their associated numbers is feasible within the U.S. without problems arising from having more than one person utilizing a given social security account number.

8. As part of this criminal enterprise's fraudulent document operation, manufacturers, to include, JUN YUN ZHANG and CO-CONSPIRATOR A, alter either counterfeit or authentic PRC passports to contain a customer's photograph as well as alter the passport's biographical page in order to match the identity of an authentic social security account card of a third party. After preparation of such documents, related brokers and couriers assist customers with using these documents to fraudulently obtain Illinois driver's licenses or identification cards from various ISOS Driver Services Facilities. The following chart lists the general affiliation of brokers with manufacturers, JUN YUN ZHANG and CO-CONSPIRATOR A:

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<sup>5</sup> Throughout the investigation, the Social Security Administration, Office of the Inspector General ("SSA/OIG") has been consulted on numerous occasions. Based upon information provided by SSA/OIG, Affiant is aware that the "586" prefix is a designation indicating that the social security account card was issued in either American Samoa, Guam, Philippines or Saipan. Guam and Saipan are part of the Commonwealth of the Northern Mariana Islands and are considered U.S. territories.

JUN YUN ZHANG

CO-CONSPIRATOR A

JUN YUE ZHANG  
JUN XI ZHANG  
JUN SHUN ZHANG  
DONG DONG GUO  
TIANSHENG ZHANG  
XIN LI WANG  
MEIZHU WANG  
WENYUAN ZHOU  
YONGHUI WANG  
ZHAOFA WANG

GUOQI ZHANG  
YIYI SHI  
SONG YAN SHI  
LI WEN HUANG  
RONG SI

9. In conjunction with assisting customers obtain Illinois driver's licenses, brokers affiliated with this criminal enterprise provide instruction relative to an alpha-numeric memorization scheme that will allow a non-English speaking/reading customer to be able to pass the English version of the ISOS Driver's License Written Examination. This scheme is based upon having the customer memorize a series of rules which will allow a customer to correctly answer the multiple-choice style questions found on the ISOS Driver's License Written Examination. For example, these rules are based upon such factors as always selecting the multiple-choice answer that begins with a particular letter of the alphabet or selecting the answer that is the shortest, longest or that contains a particular number of words or letters. This memorization scheme takes into account the fact that there are multiple versions of the examination.

10. Additionally, brokers will provide brief driving instruction to a customer in furtherance of helping the customer pass the ISOS Vehicle Road Test. However, at times, brokers affiliated with this criminal enterprise have been able to establish relationships with several corrupt ISOS Public Service Representatives. Through these relationships, brokers have paid bribes to ISOS Public Service Representatives, to include TIMOTHY JOHNSON and JAMES HOWELL among

others, in furtherance of altering or forgoing the ISOS Vehicle Road Test.

11. Upon successfully obtaining an Illinois driver's license and/or identification card, the customer is allowed to retain the social security account card, but has to return the PRC passport, unless additional money is paid. These returned PRC passports can then be re-used by a manufacturer in furtherance of the scheme by changing the picture and altering the biographical page of the passport. Typically, customers will pay between approximately \$1,200 and \$3,500 to purchase an identity set.

12. This criminal enterprise obtains new customers through customer referrals, Chinese operated employment agencies and driving schools as well as from advertisements which are often placed in the World Journal.<sup>6</sup>

13. Based upon investigation, it is believed that JUN YUN ZHANG has been involved, in various capacities, with obtaining and selling fraudulent personal identification documents for approximately the last ten years. Further, it is believed that around late 2003, JUN YUN ZHANG, CO-CONSPIRATOR A and their associated brokers began producing altered and fraudulent documents and selling such documents to larger numbers of customers. Between approximately March 2006 and December 2008, law enforcement conducted numerous controlled purchases of altered PRC passports, social security account cards and Illinois driver's license and identification cards as arranged through JUN YUN ZHANG and various brokers. Based upon these controlled purchases as well as other investigation, it is believed that in approximately late 2007 or early 2008,

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<sup>6</sup> The World Journal is a Chinese language newspaper distributed throughout the U.S. and Canada. The World Journal has regional versions to include editions published in Atlanta, Boston, Chicago, New York, San Francisco and Washington D.C., among others. The World Journal can also be accessed via the Internet at [www.worldjournal.com](http://www.worldjournal.com).

CO-CONSPIRATOR A became less involved in the criminal enterprise and that his/her duties were taken over by other members.

14. In September 2008, Court authorization was obtained to intercept wire communications of two mobile telephones utilized by JUN YUN ZHANG and QIONG ZHOU, who is a girlfriend of JUN YUN ZHANG. Pursuant to these interceptions and other investigation, it was determined that in approximately the summer of 2008, JUN YUN ZHANG became concerned that he was under law enforcement investigation and, therefore, he dramatically curtailed his involvement in manufacturing and selling fraudulent personal identification documents.<sup>7</sup> Moreover, as a result of illegally residing in the U.S., JUN YUN ZHANG made attempts to obtain legal residency status out of fear that if he was arrested he would be deported from the U.S.

15. As a result of JUN YUN ZHANG minimizing his involvement in the criminal enterprise, he began referring brokers and customers to his brother, JUN YUE ZHANG, after approximately September 2008. Based on investigation detailed below, it is believed that JUN YUE ZHANG's wife or girlfriend, MANUFACTURER A, obtained JUN YUN ZHANG's computer equipment and began to manufacture altered PRC passports in furtherance of this criminal enterprise, albeit in greatly reduced volume. More specifically, JUN YUE ZHANG and brokers working with JUN YUE ZHANG would only accept customers who they personally knew or trusted.

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<sup>7</sup> Based upon information from Court authorized wire interceptions and other investigation, it is believed that the arrests of certain Chinese and Korean individuals in Georgia, Illinois, Michigan and Virginia in 2008, who were familiar with the operations of this criminal enterprise, is partially the basis for this concern. These arrests were pursuant to un-related investigations, however the subjects arrested had direct interaction with the referenced criminal enterprise. Additionally, it is believed that JUN YUN ZHANG's concern was heightened by increased scrutiny being placed on the fraudulent documents being presented to ISOS personnel at Driver Services Facilities as well as an increased law enforcement presence at such facilities.

16. In an attempt to determine the scope of this criminal enterprise's operations, analysis has been conducted of ISOS records. ISOS has provided law enforcement a compiled list of driver's licenses and identification cards issued to applicants who utilized social security account numbers with the prefix, "586." A review of this list revealed that between the years of 1970 and 2002, approximately 787 Illinois driver's licenses and identification cards were issued to individuals who utilized social security account numbers with the prefix, "586." This correlates to an average usage rate of approximately 25 times per year. This low usage rate appears consistent with the fact that minimal usage would be expected due to the remote locales where the numbers were issued, namely, America Samoa, Guam, Philippines and Saipan. In contrast, between January 1, 2003 and December 10, 2008, approximately 15,666 Illinois drivers' licenses and identification cards were issued to individuals utilizing social security account numbers with the prefix, "586."<sup>8</sup> To date, law enforcement is not aware of any mass influx into Illinois of individuals from either American Samoa, Guam, Philippines or Saipan which would account for such an increase. Based upon the investigation detailed hereinafter, it is believed that this criminal enterprise is responsible, in large part, for this increase.

### **III. SUMMARY OF DEFENDANTS INVOLVED IN THE CONSPIRACY**

17. An identification of each defendant and a reference to some of the paragraphs in this Affidavit pertaining to that particular defendant is set forth below:

#### **A. Manufacturers**

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<sup>8</sup> It should be noted that some individuals obtain both an identification card as well as a driver's license, due to the fact that the identification card is valid for a longer period of time. Therefore, this figure does not necessarily represent that 15,666 different individuals received some form of identification.

1. JUN YUN ZHANG is also known as ("a/k/a") "Lao Sze." A query of Immigration and Customs Enforcement ("ICE") records indicated that JUN YUN ZHANG entered the U.S. on or about January 9, 1989. JUN YUN ZHANG is illegally residing in the U.S. and is under Removal Proceedings. JUN YUN ZHANG is JUN YUE ZHANG's and JUN XI ZHANG's brother. (See Paragraphs 19, 21, 61, 66, 68-81, 85, 92, 95, 103-106, 109, 134, 140, 155-160, 162-170, 172, 174, 176-184, 186-220, and 244-245).

**B. Brokers/Couriers**

2. JUN YUE ZHANG, a/k/a LAO SAN; a query of ICE records revealed that JUN YUE ZHANG entered the U.S. on or about June 1, 1993. JUN YUE ZHANG is illegally residing in the U.S. and is subject to Removal Proceedings. JUN YUE ZHANG is JUN YUN ZHANG's and JUN XI ZHANG's brother. (See Paragraphs 70, 76, 85, 184-185, 189, 191-193, 199-202, 214-215, 220, 231, and 245).

3. JUN XI ZHANG, a/k/a LAO WU; a query of ICE records revealed that JUN XI ZHANG entered the U.S. on or about November 1, 1993. JUN XI ZHANG is illegally residing in the U.S. and a warrant of removal was issued on January 2, 1998. JUN XI ZHANG is the brother of JUN YUN ZHANG and JUN YUE ZHANG. (See Paragraphs 65-66, 76, 108, 198, 200, 204, 208-210, 220, 226, 228, and 245).

4. JUN SHUN ZHANG, a/k/a MIKEY; a criminal history check for JUN SHUN ZHANG revealed that on July 19, 2007, JUN SHUN ZHANG was arrested by the Illinois Secretary of State Police/Cook County Sheriff's Office for Offering a Commercial Bribe. On February 15, 2008, JUN SHUN ZHANG was found guilty and was sentenced to 24 months of probation. A query of ICE records for JUN SHUN ZHANG was inconclusive due to the fact that a related record exists

based upon cross-referencing a relevant FBI number. However, this record exists under the identity of VICTIM A. Based upon a separate investigative matter, Affiant has interviewed VICTIM A who advised that JUN SHUN ZHANG stole VICTIM A's legitimate personal identification documents and assumed the identity of VICTIM A. As a result, based on investigation to date, it is believed that JUN SHUN ZHANG is in the U.S. illegally. (See Paragraphs 79-81, 115, 122, 127, 131-134, 156-157, 205-206, 215, 231, and 245).

5. DONG DONG GUO, a/k/a XIAO ZHANG; a query of ICE records indicated that DONG DONG GUO entered the U.S. on or about February 21, 2005. DONG DONG GUO is legally residing in the U.S. as a Lawful Permanent Resident.<sup>9</sup> DONG DONG GUO is the son of JUN YUN ZHANG. (See Paragraphs 65-66, 79, 100, 106-110, 112-114, 116, 118-119, 122-124, 126, 135, 139, 156-157, 179, 186, 231, and 245).

6. GUOQI ZHANG; a query of ICE records indicated that GUOQI ZHANG entered the U.S. on or about January 25, 2005. GUOQI ZHANG is legally residing in the U.S. as a Lawful Permanent Resident. (See Paragraphs 21-31, 82, 84-89, 91, 122, 129, 140-145, 147-153, 157, 167 and 245).

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<sup>9</sup> As more fully set forth in this Affidavit, this individual, who is believed to be JUN YUN ZHANG's son, has identified himself by the nickname "Xiao Zhang" (Little Zhang) to an undercover officer. This undercover officer and other law enforcement officers have identified an Illinois driver's license photograph issued in the name of DONG DONG GUO as being XIAO ZHANG. A confidential source, CS-1, who is more fully described herein, has also identified the Illinois driver's license photograph of DONG DONG GUO as being JUN YUN ZHANG's son. Further, this confidential source has indicated that JUN YUN ZHANG's son may have illegally entered the U.S. Consequently, based upon the foregoing as well as the nature of the criminal activity detailed in this Affidavit, various computer database checks, to include those of ICE and information provided by this confidential source, it is believed that JUN YUN ZHANG's son may have assumed the identity of DONG DONG GUO. For the purposes of this Affidavit, this individual will be referred to as DONG DONG GUO.

7. TIANSHENG ZHANG; a query of ICE records indicated that TIANSHENG ZHANG entered the U.S. on or about January 25, 2000. TIANSHENG ZHANG is a naturalized U.S. citizen. (See Paragraphs 61, 63, 100-101, 122-123, 155-156, 158, 180, 187, 194, 207, 211, and 245).

8. XIN LI WANG, a/k/a TONY; a query of ICE records revealed that XIN LI WANG entered the U.S. on or about February 1, 2002. XIN LI WANG is currently residing in the U.S. as a Lawful Permanent Resident. XIN LI WANG is believed to be the brother of MEIZHU WANG. (See Paragraphs 170-174, 176-177, 218, 231, and 245).

9. MEIZHU WANG; a query of ICE records revealed that MEIZHU WANG entered the U.S. on or about November 17, 2001. MEIZHU WANG is currently residing in the U.S. as a Lawful Permanent Resident. MEIZHU WANG is believed to be the sister of XIN LI WANG. (See Paragraphs 70, 95-97, 100, 218-219, 231 and 245).

10. LI WEN HUANG; on December 1, 1998, LI WEN HUANG was arrested by what was formerly the Immigration and Naturalization Service (“INS”) for Willful Misrepresentation of a Material Fact and Immigrant Not in Possession of Valid Entry Documents. The relevant criminal history records are unclear regarding how this arrest was resolved. A query of ICE records revealed that LI WEN HUANG entered the U.S. on or about October 23, 1998. LI WEN HUANG is illegally residing in the U.S. and a warrant of removal was issued on December 19, 2003. (See Paragraphs 140, 143, 148, 151, 153, and 246).

11. YIYI SHI, a/k/a YIYI or HUATI; a query of ICE records revealed that YIYI SHI entered the U.S. on or about April 20, 1993. YIYI SHI is illegally residing in the U.S. and a warrant of removal was issued on September 14, 2007. (See Paragraphs 36-44, 47, 48, 50, 52-57,

156, 231 and 245).

12. SONG YAN SHI; a query of ICE records revealed that SONG YAN SHI was born in the PRC and paroled into the U.S. on or about August 9, 1999. The ICE records do not indicate from which country SONG YAN SHI paroled into the U.S. SONG YAN SHI is legally residing in the U.S. (See Paragraphs 37, 44-47, 99, 154 and 245).

13. RONG SI; a query of ICE records revealed that RONG SI entered the U.S. on or about May 1, 2008.<sup>10</sup> RONG SI is currently residing in the U.S. as a Lawful Permanent Resident. (See Paragraphs 92-94, 96-98, 128, 232-234 and 246.)

14. WENYUAN ZHOU; a criminal history check for WENYUAN ZHOU revealed that on August 1, 2007, WENYUAN ZHOU was arrested by the FBI for Manufacturing, Uttering and Possessing Counterfeit and Forged Securities. In relation to this arrest, WENYUAN ZHOU pled guilty and was sentenced to approximately 21 months of incarceration. On December 11, 2003, WENYUAN ZHOU was arrested by the Ottawa County, Michigan Sheriff's Office for Felony Bribery. WENYUAN ZHOU subsequently pled guilty to State ID Card-Alter/Forge/Use and was sentenced to thirty days incarceration and a fine of \$875. A query of ICE records revealed that WENYUAN ZHOU entered the U.S. on or about January 13, 2001. WENYUAN ZHOU is illegally residing in the U.S. and in under Removal Proceedings. (See Paragraphs 61-62, 64, 116-119, 135-138, 231 and 245).

15. YONGHUI WANG; a preliminary query of ICE records revealed no record

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<sup>10</sup> Based upon information provided by a confidential source identified more fully herein, RONG SI was known to be in the U.S. as early as 2003, at which time, RONG SI attempted to engage in a fraudulent marriage in order to obtain legal residency status in the U.S. Therefore, Affiant believes that the "date of entry" listed in ICE records does not reflect RONG SI's true entry date into the U.S.

relative to YONGHUI WANG. (See Paragraphs 222-227, 229-231 and 245).

16. ZHAOFA WANG; a query of ICE records revealed that ZHAOFA WANG entered the U.S. on or about June 20, 2008.<sup>11</sup> ZHAOFA WANG is currently residing in the U.S. as a Lawful Permanent Resident. (See Paragraphs 198, 226-230 and 245).

**C. Supporting Co-Conspirator**

17. QIONG ZHOU; a query of ICE records revealed that QIONG ZHOU entered the U.S. on or about June 13, 2006. QIONG ZHOU is currently residing in the U.S. as a Lawful Permanent Resident. QIONG ZHOU is a girlfriend of JUN YUN ZHANG. (See Paragraphs 19, 66, 72, 79, 109, 168, 176, 195-196, 202, 212-217, 220 and 245).

**D. ISOS Public Service Representatives**

18. TIMOTHY T. JOHNSON JR. ("TIMOTHY JOHNSON"); is believed to be a U.S. citizen. (See Paragraphs 59, 100-101, 109, 112-114, 117, 121-123 and 245).

19. JAMES M. HOWELL ("JAMES HOWELL") is believed to be a U.S. citizen. (See Paragraphs 100, 111, 120-123, 127, 130, 132 and 245).

**IV. SOURCES OF INFORMATION**

**A. Confidential Sources**

18. Some of the information in this Affidavit was provided by cooperating individuals, including Confidential Source 1 ("CS-1"), Confidential Source 2 ("CS-2"), as well as Cooperating Defendant 1 ("CD-1") and Cooperating Defendant 2 ("CD-2"). Background information for each

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<sup>11</sup> Given that ZHAOFA WANG has been arrested prior to June 20, 2008, it is believed that ZHAOFA WANG was illegally residing in the U.S. or was in the process of immigration proceedings in order to obtain Lawful Permanent Resident status.

of the cooperating individuals is as follows:

1. CS-1: CS-1 provided information to law enforcement officers following his/her arrest in late 2005, as described below, until April 2008. A substantial portion of the information provided by CS-1 has been corroborated by further investigation, including physical surveillance, telephone record analysis, the interview of other confidential sources and through CS-1's participation in consensually recorded telephonic and in-person conversations. Between 2000 and 2005, CS-1 was convicted twice: CS-1 was convicted of possession of stolen property and fined; and CS-1 was also convicted of prostitution-related offenses and sentenced to court supervision. Prior to CS-1's cooperation with law enforcement officers, CS-1 was illegally residing in the U.S. and had been ordered deported in 1995. In conjunction with CS-1's cooperation, law enforcement officers assisted CS-1 with reporting to ICE. In early April 2008, ICE issued CS-1 an Order of Supervision which allowed CS-1 to remain in the U.S. as long as CS-1 followed a set of prescribed conditions. Should CS-1's cooperation be determined to have significantly supported the investigation and corresponding prosecution, law enforcement officers will consider applying for an S-Visa on CS-1's behalf in support of conferring permanent legal residency status to CS-1. CS-1 has been advised of this fact. Additionally, to date, CS-1 has been paid approximately \$3,000 by law enforcement in exchange for his/her cooperation.<sup>12</sup>

[2]. CS-2: CS-2 has been providing reliable, timely information to law enforcement officers since approximately 2001. Since that time, law enforcement officers have spoken with CS-2 in person, or telephonically, on numerous occasions. A substantial portion of CS-

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<sup>12</sup> CS-1 has not been cooperating with law enforcement since late April 2008 and has also not been reporting to ICE as required by the Order of Supervision described above. As a result, CS-1 violated the terms of CS-1's Order of Supervision and can be deported from the U.S.

2's information regarding individuals who are involved in manufacturing and selling altered and fraudulent personal identification documents has been corroborated by independent investigation, to include physical surveillance, telephone record analysis and through CS-2's participation in several consensually recorded telephonic and in-person conversations with subjects of the investigation. Although CS-2 is a citizen of a foreign country, CS-2 is currently residing in the U.S. as a Lawful Permanent Resident. Between 1990 and 2000, CS-2 has two criminal convictions: CS-2 was convicted of a criminal sexual offense and sentenced to a term of incarceration; and CS-2 was also convicted of issuing dishonored checks and fined. CS-2 also has an arrest for fraud which was dismissed.

As a result of CS-2's two convictions, CS-2 was declared eligible for deportation from the U.S. and entered into formal Removal Proceedings in approximately 2001. CS-2 initially began cooperating with law enforcement officers in an attempt to seek assistance relative to CS-2's Removal Proceedings. Although inquiries relative to CS-2's deportation status were made by personnel from the FBI and from the former INS, no request was made or action undertaken in an effort to delay or alter CS-2's Removal Proceedings. Ultimately, the U.S. Department of Justice, Executive Office for Immigration Review, Office of the Immigration Judge, ruled that CS-2 was not subject to removal and subsequently, CS-2 received CS-2's Lawful Permanent Resident status. As a result of not being deported and based upon the relationship formed with law enforcement, CS-2 has continued to provide information to law enforcement officers. Additionally, to date, CS-2 has been paid a total of approximately \$15,000 by law enforcement in exchange for his/her cooperation and incurred expenses relative to this matter and other investigations.

**B. Cooperating Defendants**

[1]. CD-1: CD-1, who is illegally in the U.S., was indicted in connection with a separate federal investigation and charged with bank fraud and identity theft. CD-1 is currently cooperating with law enforcement in the hope of obtaining a reduced sentence in that case. In addition, based on a criminal history check, CD-1 has three additional arrests, but no convictions, for offenses including driving without a license, unlawful use of a license and prostitution. It should be noted that all information provided by CD-1, which is referenced in this Affidavit, was provided under the protection of a signed proffer agreement. Information provided by CD-1 has been corroborated by physical surveillance, electronic surveillance, telephone record analysis and a review of ISOS records.

[2]. CD-2: CD-2, who is illegally in the U.S., is currently cooperating with law enforcement in the hope of obtaining a reduced sentence related to a pending federal criminal charge. Based on a criminal history check, CD-2 has three arrests, two of which resulted in convictions related to forged securities and bribery. CD-2 also has an traffic related arrest. Based on the criminal history records, it is unclear how this arrest was resolved. It should be noted, that CD-2 was interviewed on December 24, 2008 pursuant to a signed proffer agreement. Information provided by CD-2 has been corroborated by physical surveillance, electronic surveillance, telephone record analysis and a review of ISOS records.

### **C. Court Authorized Interception of Wire Communications**

19. On August 29, 2008, Acting Chief Judge Ronald A. Guzman signed Orders authorizing the interception of wire communications to and from telephone numbers (646)284-4983 ("**TARGET PHONE 1** ") and (312)863-1467 ("**TARGET PHONE 2**"), which were telephones identified as being utilized by JUN YUN ZHANG and QIONG ZHOU. The interception of wire

communications to and from **TARGET PHONES 1 AND 2** was initiated on September 2, 2008. On September 30, 2008, Chief Judge James F. Holderman signed Orders authorizing the continued interception of wire communications to and from **TARGET PHONES 1 AND 2**. Interception of such wire communications was terminated on October 29, 2008.

20. Throughout this Affidavit, summaries of intercepted telephone calls as well as summaries of consensually recorded conversations involving confidential sources and undercover officers are set forth. These summaries do not include references to all of the topics covered during the conversations that were intercepted, nor do they include references to all statements made by the speakers on the topics that are described. Further, the recorded and intercepted conversations referenced in this Affidavit were either conducted in the Fuzhou Chinese or Mandarin Chinese languages and were subsequently translated into the English language by other law enforcement officers or linguistic personnel familiar with such languages. For some of the conversations summarized in this Affidavit, I have interpreted portions of the conversation, denoted by parenthetical notations, based upon (a) the contents and context of the conversations, (b) my experience and training as a law enforcement officer, (c) the experience and training of other law enforcement officers and linguistic personnel involved in this investigation, (d) information provided by CS-1, CS-2, CD-1 and CD-2, and (e) the other information gathered during the course of the investigation. All times listed for the intercepted conversations are approximate. The summaries of the intercepted conversations set forth in this Affidavit are based upon preliminary, not final, transcripts.

**V. EVIDENCE ESTABLISHING PROBABLE CAUSE TO SUPPORT CRIMINAL COMPLAINTS AND SEARCH WARRANTS**

**A. Information Provided by CS-2 Relative to Broker GUOQI ZHANG**

21. On November 30, 2005, CS-2 advised law enforcement officers that through unrecorded conversations with GUOQI ZHANG, CS-2 learned that for a fee of \$3,000, GUOQI ZHANG would provide a customer with a PRC passport, social security account card and a Wisconsin driver's license. CS-2 further advised that GUOQI ZHANG only required a passport photograph from the particular customer in order to have the documents prepared. Through observation, CS-2 knew that GUOQI ZHANG utilized a vehicle bearing Illinois license plate 5758110,<sup>13</sup> and utilized mobile telephone number (708)653-8197.<sup>14</sup> As detailed later in this Affidavit, through physical surveillance and consensually recorded conversations between CS-2 and JUN YUN ZHANG, it is believed that GUOQI ZHANG is a broker who has worked with manufacturer, CO-CONSPIRATOR A, and, on rare occasions, with manufacturer JUN YUN ZHANG.

22. On December 21, 2005, CS-2 met with law enforcement personnel and provided a photograph of GUOQI ZHANG, which was derived from a PRC identification document, and advised that GUOQI ZHANG was born on October 25, 1963. A query of ISOS records revealed that driver's license number Z52028063304 had been issued to GUOQI ZHANG, who was born on October 25, 1963, and resided at 17254 71st Court, Tinley Park, Illinois. Based upon a comparison of the photograph provided by CS-2 and the ISOS driver's license photograph, both appeared to

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<sup>13</sup> A query of ISOS vehicle registration records revealed that license plate 5758110 was registered INDIVIDUAL 1 and INDIVIDUAL 2 at 17254 71st Court, Tinley Park, Illinois. Based upon ICE records, INDIVIDUAL 1 is believed to be GUOQI ZHANG's wife.

<sup>14</sup> On August 21, 2006, telephone subscriber records revealed that telephone number (708)653-8197 was subscribed to by INDIVIDUAL 1 with an address of 7121 170th Street, Unit 1E, Tinley Park, Illinois.

depict the same individual.

**B. December 23, 2005: Consensually Recorded Telephone Call Between CS-2 and GUOQI ZHANG Regarding Fraudulent Personal Identification Documents**

23. On December 23, 2005, CS-2 met with law enforcement officers and participated in a consensually recorded telephone conversation with GUOQI ZHANG. At approximately 10:51 a.m., CS-2 called GUOQI ZHANG and spoke with GUOQI ZHANG in the Mandarin Chinese language.<sup>15</sup> During this conversation, CS-2 stated, in part, that CS-2 had an individual who had only a personal photograph, which CS-2 intended as a reference to obtaining identification documents from GUOQI ZHANG. Further, CS-2 stated, "Is it still \$3,000 now" and GUOQI ZHANG advised, "Correct." Later in the conversation, CS-2 asked, "How many days will it take to get it done," at which time, GUOQI ZHANG stated, "Ah, two days at most. If he (CS-2's customer) can drive, it will be one day." CS-2 clarified, "Both social security card and driver's license can be done," at which time, GUOQI ZHANG responded, "Get all done in one day." CS-2 further clarified, "So, that means the passport was included (passport to be permanently maintained by CS-2's customer)" and GUOQI ZHANG stated, "Correct." GUOQI ZHANG then stated, "You will pay the money as long as the ID comes out" and stated that, "[We can] also take you to the test for driver's license." Also during this conversation, GUOQI ZHANG indicated that the driver's license would be obtained from Illinois. At the conclusion of the conversation, CS-2 advised that CS-2 would provide a photograph to GUOQI ZHANG at a later date.

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<sup>15</sup> During all telephone conversations between CS-2 and GUOQI ZHANG that are referenced in this Affidavit, which took place at the instruction of law enforcement, GUOQI ZHANG utilized telephone number (708)653-8197. Based upon previous in-person conversations with GUOQI ZHANG, CS-2 was able to confirm that the voice of the recipient of this telephone call was that of GUOQI ZHANG.

**C. March 10, 2006: CS-2 Purchased Fraudulent Personal Identification Documents from GUOQI ZHANG**

24. On March 7, 2006, CS-2 met with law enforcement officers for the purpose of conducting a consensually recorded meeting with GUOQI ZHANG.<sup>16</sup> At approximately 8:35 a.m., law enforcement officers searched CS-2 and CS-2's vehicle for the presence of money, drugs, weapons, fraudulent personal identification documents or other contraband (hereinafter, collectively "Contraband"), with negative results. Thereafter, CS-2 was equipped with an audio recording device and a transmitter that allowed law enforcement officers to monitor the conversation between CS-2 and GUOQI ZHANG in real time. CS-2 was also provided with a passport photograph which depicted CS-2. A short time later, CS-2 departed the meeting location in CS-2's vehicle under continuous law enforcement surveillance.

25. At approximately 9:00 a.m., law enforcement officers observed CS-2 park CS-2's vehicle in a lot associated with Walgreens, which was located at 316 West Cermak Road, Chicago, Illinois ("Chinatown Walgreens"). At approximately 9:12 a.m., law enforcement officers observed a black Toyota Camry, bearing Illinois license plate 5758110 ("Toyota Camry[1]"), park next to CS-2's vehicle. Subsequently, GUOQI ZHANG<sup>17</sup> was observed entering the front passenger's side seat of CS-2's vehicle. After approximately one minute, GUOQI ZHANG exited CS-2's vehicle and departed in the Toyota Camry[1] as surveilled by law enforcement officers driving to and entering an undetermined residential location in the Chinatown community. Meanwhile, law enforcement

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<sup>16</sup> On March 6, 2006, during a consensually recorded telephone call with GUOQI ZHANG, CS-2 and GUOQI ZHANG agreed to meet on March 7, 2006.

<sup>17</sup> GUOQI ZHANG was identified based upon physical surveillance, a review of an Illinois driver's license photograph as well as a review of ISOS and ICE records.

officers surveilled CS-2's vehicle to a predetermined location, where CS-2 and CS-2's vehicle were searched for the presence of Contraband with negative results. In conjunction with these searches, it was determined that CS-2 was no longer in possession of the passport photograph of CS-2. The audio recording device and transmitter were also recovered at that time.

26. CS-2 subsequently advised law enforcement officers that after parking in the Chinatown Walgreen's lot, GUOQI ZHANG arrived in a black vehicle and then entered CS-2's vehicle. While inside the vehicle, CS-2 provided the passport photograph of CS-2 to GUOQI ZHANG. A review of the recorded conversation revealed that GUOQI ZHANG commented that there was a reflection in the photograph around CS-2's eyes (CS-2's eyeglasses) and complained that the photograph was too small. At the conclusion of the conversation, GUOQI ZHANG stated, "I'll tell you when it (PRC passport and social security account card) is done. I'll give you a timely call." CS-2 advised that GUOQI ZHANG then departed.

27. On March 9, 2006, at approximately 10:00 p.m., GUOQI ZHANG called CS-2 and advised CS-2 that the documents were available and CS-2 agreed to meet with GUOQI ZHANG on March 10, 2006. Due to the unforeseen nature of this telephone call, this conversation was not recorded. After receiving this incoming call, CS-2 notified law enforcement officers about the call.

28. On March 10, 2006, CS-2 met with law enforcement officers for the purpose of conducting a consensually recorded meeting with GUOQI ZHANG. At approximately 3:30 p.m., law enforcement officers met with CS-2 and searched CS-2 and CS-2's vehicle for the presence of Contraband with negative results. Thereafter, CS-2 was provided with \$3,000 in pre-recorded funds. At approximately 4:50 p.m., CS-2 was equipped with an audio/video recording device and CS-2 departed in CS-2's vehicle under continuous law enforcement surveillance. At approximately 5:04

p.m., law enforcement officers observed CS-2 park in the Chinatown Walgreens lot while Toyota Camry[1], driven by GUOQI ZHANG, was entering the same lot. Thereafter, GUOQI ZHANG briefly entered CS-2's vehicle and then departed in Toyota Camry[1]. At approximately 5:10 p.m., law enforcement officers observed Toyota Camry[1], driven by GUOQI ZHANG, driving through the Chinatown Walgreens lot, at which time, CS-2, driving CS-2's vehicle, began to follow GUOQI ZHANG. At this time, law enforcement officers briefly lost sight of Toyota Camry[1] and CS-2's vehicle. Several minutes later, CS-2's vehicle was observed parked on the south side of 19th street between Wells Street and Wentworth Avenue, Chicago, Illinois.

29. At approximately 5:20 p.m., law enforcement officers observed CS-2, driving CS-2's vehicle, driving east on 19th Street and south on Wentworth Avenue while GUOQI ZHANG was observed driving Toyota Camry[1] east on 19th Street and north on Wentworth Avenue. CS-2 was surveilled by law enforcement officers to a pre-determined location, at which time, CS-2 met with law enforcement officers. Subsequently, the audio/video recording device was recovered and CS-2 provided law enforcement officers with a biographically-matched PRC passport,<sup>18</sup> bearing CS-2's photograph, and a social security account card.<sup>19</sup> Thereafter, CS-2 and CS-2's vehicle were searched

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<sup>18</sup> The name, sex and date of birth listed in this passport matched the identity associated with the purchased social security account card as verified by SSA/OIG. The PRC passport was submitted to the Immigration and Customs Enforcement, Office of Investigations, Forensic Document Laboratory ("FDL") for analysis. The FDL maintains a library that is comprised of genuine passport exemplars obtained from various foreign governments. The FDL report concerning this analysis reflects that the biographical/photograph page with the security laminate and the last page of the passport had been substituted with counterfeit pages. The report also reflects that these counterfeit pages were produced with color ink-jet printing technology and did not conform to comparable genuine specimens on file in the FDL library. Further, the report reflects that the remainder of the passport conformed to comparable specimens on file.

<sup>19</sup> This social security account card, which listed an account number with the prefix "586," was submitted to the FDL. A review of the corresponding report revealed that this card was authentic and had not been altered. Based upon information provided by the SSA/OIG, it was

for Contraband with negative results.

30. Subsequently, CS-2 informed law enforcement officers that after CS-2 parked at the Chinatown Walgreens, GUOQI ZHANG approached CS-2's vehicle and stated that GUOQI ZHANG needed more time. Further, CS-2 advised that GUOQI ZHANG then departed. After a period of time, CS-2 observed GUOQI ZHANG drive through the Chinatown Walgreens parking lot and physically motion for CS-2 to follow. CS-2 followed GUOQI ZHANG and observed GUOQI ZHANG park in the vicinity of 19th Street and Tan Court.<sup>20</sup> CS-2 also parked and GUOQI ZHANG entered CS-2's vehicle. While inside CS-2's vehicle, GUOQI ZHANG provided a PRC passport, bearing a photograph of CS-2, as well as a social security account card to CS-2. In addition, CS-2 provided \$3,000 to GUOQI ZHANG as previously agreed upon. Due to the fact that GUOQI ZHANG was aware that CS-2 knew the procedure for obtaining a driver's license in Illinois, CS-2 did not request GUOQI ZHANG's assistance with traveling to an ISOS Driver Services Facility in order for CS-2 to obtain a driver's license with the fraudulent documents provided by GUOQI ZHANG.

31. A review of the video recording from the meeting revealed that GUOQI ZHANG was the only individual to enter CS-2's vehicle. A review of the recorded conversation revealed that CS-2 stated, "It is wonderful, it's so wonderful! It is really a good job." GUOQI ZHANG replied, "It's a good job" and further stated, "Now you can apply for a driver's license, ID, and some credit cards

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determined that this social security account card was originally issued in Saipan in 1994 and that no duplicate cards had ever been issued.

<sup>20</sup> CS-2 incorrectly identified the location as 19th Street and Tan Court. For reference purposes, Tan Court is located one block south of 19th Street and terminates at Wells Street, whereas 19th Street initiates at Wells Street and terminates at Wentworth Avenue.

and then you can pay off." Also during the conversation, CS-2 inquired as to how much money CS-2 could make if CS-2 had customers who wanted documents. GUOQI ZHANG replied, "It is that, first of all, I don't mind how much you make. I'll charge \$2,000 to help you to get ID and driver's license. You make \$1,500 if you charge your client \$3,500 or make \$500 by charging \$2,500, you know."

**D. Information Provided by CD-1 relative to CO-CONSPIRATOR A**

32. In 2008, CD-1 was interviewed by law enforcement officers. During these interviews, CD-1 advised that CD-1 met CO-CONSPIRATOR A in approximately 2004, while both were eating in a restaurant. CD-1 has identified an Illinois driver's photograph of CO-CONSPIRATOR A for law enforcement officers. After this initial meeting with CO-CONSPIRATOR A, CD-1 continued to occasionally talk with CO-CONSPIRATOR A. During one conversation with CO-CONSPIRATOR A in early 2004, CD-1 mentioned that CD-1 needed to obtain a driver's license and that CD-1 was concerned about passing the written examination. Subsequently, CO-CONSPIRATOR A advised that CO-CONSPIRATOR A could help CD-1 pass the written examination with a special answer sheet. CD-1 asked CO-CONSPIRATOR A if the answer sheet was prepared in Korean and CO-CONSPIRATOR A stated that the answer sheet was available in Chinese or English. Thereafter, CD-1 obtained an English version of the answer sheet from CO-CONSPIRATOR A and obtained an Illinois driver's license in approximately April 2004. In connection with obtaining this driver's license, CD-1 took the ISOS Vehicle Road Test in a vehicle utilized by CO-CONSPIRATOR A. A review of ISOS records by law enforcement has confirmed that CD-1 obtained a driver's license on April 22, 2004. Further, CD-1 identified this driver's license photograph of CD-1 as being the driver's license obtained with the assistance of CO-

CONSPIRATOR A.

33. Additionally, CD-1 advised that through conversations with CO-CONSPIRATOR A prior to April 2004, CO-CONSPIRATOR A advised that CO-CONSPIRATOR A could help CD-1 obtain passports and social security accounts cards for CD-1's friends. CD-1 advised law enforcement that on approximately two to three occasions in approximately 2003 and early 2004, CO-CONSPIRATOR A assisted CD-1 by preparing personal identification documents for CD-1's friends. On each occasion, CD-1 provided a passport photograph of CD-1's friend to CO-CONSPIRATOR A and CO-CONSPIRATOR A then made a PRC passport to contain that photograph. Thereafter, CO-CONSPIRATOR A provided the passport, a social security account card and an addressed envelope (proof of residency) to CD-1. On each occasion, CD-1 assisted CD-1's friend with using these documents to obtain an Illinois driver's license or identification card. For CD-1's friends who wanted a driver's license, CD-1 utilized the answer sheet previously provided by CO-CONSPIRATOR A to instruct them how to pass the ISOS Driver's License Written Examination. Upon CD-1's friends successfully obtaining driver's licenses or identification cards, CD-1 returned the PRC passports to CO-CONSPIRATOR A and paid CO-CONSPIRATOR A a little over \$1,000 for each friend.

34. Further, CD-1 advised law enforcement officers that CD-1 provided passport photographs and returned PRC passports to CO-CONSPIRATOR A's residence which was located, at the time, near 35th and Archer Avenue, Chicago, Illinois. Affiant believes that CD-1 was referring to a residence, located at 1924 West 34th Place, Chicago, Illinois, which was known to be utilized by CO-CONSPIRATOR A based upon a review of CPD arrest records and ISOS records. A review of ISOS records shows that between approximately August 2005 and October 2007,

approximately 17 Illinois driver's licenses and identification cards were issued to applicants who utilized the residential address of 1924 West 34th Place and who also utilized social security account numbers with the prefix, "586."

35. Through conversations with CO-CONSPIRATOR A in approximately 2006, CD-1 became aware that it was possible for CD-1's customers to obtain driver's licenses without having to take the ISOS Vehicle Road Test. At that time, CO-CONSPIRATOR A told CD-1 that it was possible to pay money to "DMV" (ISOS) employees in order to avoid taking the vehicle road test. During this conversation, CO-CONSPIRATOR A indicated that CD-1's customers would have to pay more because more money was needed to pay the "DMV" (ISOS) employees. CD-1 advised law enforcement that CD-1 never paid money to a "DMV" (ISOS) employee in order for CD-1 or CD-1's friends to obtain a driver's license.

**E. January 29, 2007: CS-1 Purchased Fraudulent Personal Identification Documents From YIYI SHI, SONG YAN SHI and CO-CONSPIRATOR B.**

36. On December 20, 2005, CS-1 advised law enforcement officers that based upon unrecorded conversations with an individual known as "YIYI" or "HUATI" on unknown prior dates, CS-1 was aware that YIYI SHI helped Chinese people obtain Illinois driver's licenses and that YIYI SHI sold passports, social security account cards and travel visas. Through investigation in 2007, including physical surveillance, telephone record analysis and obtaining additional information from CS-1, it is believed that YIYI SHI was a broker who worked with CO-CONSPIRATOR A. Between approximately November of 2006 and September of 2008, law enforcement observed YIYI SHI at an ISOS Driver Services Facility on approximately eight occasions.

37. On January 21, 2007, CS-1 met with law enforcement and participated in a

consensually recorded conversation with YIYI SHI.<sup>21</sup> At approximately 9:54 p.m., CS-1 called telephone number (312)285-6688<sup>22</sup> and spoke with YIYI SHI who identified himself as "HUATI." During this conversation, CS-1 advised, "[I] have something to talk with you. As for me, my license was canceled by the cops, I was ordered to show to the court. I think I am in trouble now, without a license, I cannot drive." Further, CS-1 inquired about meeting with YIYI SHI and YIYI SHI indicated he was busy and that it would be more convenient to meet the following day.

38. On January 22, 2007, CS-1 met with law enforcement officers for the purpose of conducting a consensually recorded meeting with YIYI SHI. While meeting with law enforcement officers, CS-1 and CS-1's vehicle were searched for Contraband. These searches revealed that CS-1 was in possession of a personal sum of money which CS-1 was allowed to retain, but in all other respects the searches were negative. Further, CS-1 was equipped with an audio/video recording device and transmitter as well as \$500 in pre-recorded funds.

39. At approximately 4:54 p.m., CS-1 called YIYI SHI, at which time, YIYI SHI agreed to meet with CS-1 at YIYI SHI's residence. Shortly thereafter, law enforcement officers observed CS-1, driving CS-1's vehicle, drive to YIYI SHI's residence. Beginning at approximately 5:21 p.m.,

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<sup>21</sup> All recordings between CS-1 and YIYI SHI, SONG YAN SHI and CO-CONSPIRATOR B, referenced in this Affidavit, were conducted pursuant to a State of Illinois consensual overhear court order.

<sup>22</sup> Based upon previous unrecorded telephonic and in-person conversations with YIYI SHI in Chicago prior to 2007, CS-1 was aware that YIYI SHI utilized telephone number (312)285-6688. Telephone number (312)285-6688 is subscribed to by individual with an address of 1930 S. Louie Parkway, Chicago, Illinois, which is known to be a residence utilized by YIYI SHI based upon physical surveillance and ISOS records. For all telephone conversations referenced in this Affidavit between CS-1 and YIYI SHI, YIYI SHI utilized telephone number (312)285-6688. Based upon previous in-person conversations with YIYI SHI, CS-1 was able to confirm that the voice of the recipient of this telephone call was consistent with that of YIYI SHI.

law enforcement officers observed the following: CS-1 entering YIYI SHI's residence through an open garage door. At approximately 5:32 p.m, CS-1 was observed exiting YIYI SHI's residence through the garage door. Thereafter, CS-1, driving CS-1's vehicle, was surveilled driving to and entering a Walgreens parking lot located at 501 West Roosevelt Road, Chicago, Illinois.<sup>23</sup> At approximately 6:26 p.m., CS-1 exited Walgreens and was surveilled driving back to YIYI SHI's residence. At approximately 6:32 p.m, CS-1 parked and was observed entering YIYI SHI's residence. Approximately five minutes later, CS-1 was observed exiting YIYI SHI's residence and was surveilled to a pre-determined location.

40. Thereafter, CS-1 met with law enforcement officers, at which time, the audio/video recording device and transmitter were recovered. Additionally, CS-1 and CS-1's vehicle were searched for Contraband. These searches revealed that CS-1 was in possession of a personal sum of money, but these searches were negative in all other respects. CS-1 then advised law enforcement officers that upon initially entering YIYI SHI's residence, CS-1 provided \$220 of CS-1's personal money to YIYI SHI which was related to a past debt for cigarettes.<sup>24</sup> Thereafter, CS-1 had a conversation with YIYI SHI regarding YIYI SHI helping CS-1 obtain an Illinois driver's license. A review of the video and audio recording confirmed that CS-1 had a conversation with YIYI SHI and during the first meeting with YIYI SHI, CS-1 advised that CS-1 received "three tickets" and therefore CS-1's "license was canceled."<sup>25</sup> CS-1 asked, "How much do I have to pay for it (referring

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<sup>23</sup> At this time, CS-1 telephonically notified law enforcement officers that YIYI SHI had instructed CS-1 to obtain a personal passport photograph.

<sup>24</sup> The cigarettes were not properly stamped by the U.S. government and as a result, should not have been sold to or purchased by CS-1.

<sup>25</sup> YIYI SHI was identified based upon physical surveillance, surveillance video, a review of an Illinois driver's license photograph as well as a review of ISOS and ICE records.

to a passport, social security account card and driver's license)?" Subsequently, YIYI SHI stated, "With a social security card, it is between 2,500 and 2,600 (\$2,500 and \$2,600)" and further stated that if CS-1 took the "test" (ISOS Vehicle Road Test), it "[S]aves you (CS-1) some money." CS-1 asked, "Is the social security card a real one," and YIYI SHI replied, "The original one (original social security account card), but the passport is one with photo replaced (altered)." Further YIYI SHI stated, "[T]he real one (social security account card), from mainland (PRC), they entered, they came here, they entered. Do you understand? They (original social security card holders) are real persons, when they all returned back to mainland (PRC), these (social security account cards) were taken back to us." Further, CS-1 asked, "Can you find someone to take the test (ISOS Vehicle Road Test) for me?" and YIYI SHI replied, "There will be \$400 in addition to that, if someone is hired to take the test for you." During the conversation, YIYI SHI agreed to help CS-1 obtain a driver's license and instructed CS-1 to obtain a passport photograph and further instructed CS-1 not to wear the same clothes tomorrow and for CS-1 to change CS-1's hair style.<sup>26</sup>

41. CS-1 advised law enforcement that CS-1 then drove to a Walgreens store and obtained a passport photograph and then drove back to YIYI SHI's residence. Upon returning to YIYI SHI's residence, CS-1 provided CS-1's passport photograph and the \$500 in pre-recorded funds to YIYI SHI.<sup>27</sup> Additionally, YIYI SHI provided CS-1 a piece of paper with a series of numbers

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<sup>26</sup> Based upon the investigation, it is known that brokers will commonly instruct their customers to change their appearance so that their physical appearance in the passport photograph does not look identical to their physical appearance when present in person at an ISOS Driver Services Facility. This is done in an attempt to avoid having ISOS personnel detect that the passport being utilized by the customer is fraudulent.

<sup>27</sup> Based upon a review of the video recording obtained by CS-1, YIYI SHI is observed accepting CS-1's passport photograph.

and letters to memorize in order for CS-1 to be able to pass the ISOS Driver's License Written Examination. A review of the recorded conversation revealed that YIYI SHI requested that CS-1, "Pay 500 first" and that CS-1 stated, "As for the written test (ISOS Driver's License Written Examination), you should help me tomorrow. Is that right?" YIYI SHI replied, "I will give you a written instruction, all you have to do is to read it." Thereafter, YIYI SHI explained the memorization scheme to CS-1 and YIYI SHI agreed to meet with CS-1 the next day.

42. While CS-1 was meeting with law enforcement officers, law enforcement officers observed YIYI SHI departing YIYI SHI's residence in a Toyota 4-Runner bearing Illinois license plate, 6592085 ("Toyota 4-Runner"),<sup>28</sup> at approximately 6:37 p.m. A few minutes later, YIYI SHI parked and briefly entered the residence located at 1317 West 31st Place, Chicago, Illinois.<sup>29</sup> YIYI SHI then exited the residence and retrieved a white envelope from the Toyota 4-Runner and re-entered 1317 West 31st Place. At approximately 6:55 p.m., YIYI SHI exited the residence and departed in the Toyota 4-Runner.

43. On January 23, 2007, CS-1 met with law enforcement officers for the purpose of conducting a consensually recorded meeting with YIYI SHI. At approximately 8:57 a.m., CS-1 conducted a consensually recorded telephone call with YIYI SHI, at which time, CS-1 and YIYI SHI

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<sup>28</sup> A review of ISOS vehicle registration records revealed that license plate 6592085 was registered to Yi Yi Shi (YIYI SHI) with an address of 1930 South Louie Parkway, Chicago, Illinois.

<sup>29</sup> Based upon additional physical surveillances, trash searches, and ISOS records, the residence located at 1317 West 31st Place, Chicago, Illinois, is known to be utilized by CO-CONSPIRATOR A. Based upon the methods of operation identified during the course of this investigation, it is known that brokers will commonly obtain a passport photograph from a customer and then deliver the passport photograph to a manufacturer in order to have a PRC passport prepared for the respective customer.

agreed to meet in the vicinity of YIYI SHI's residence. At approximately 9:00 a.m., CS-1 and CS-1's vehicle were searched for Contraband. These searches revealed that CS-1 was in possession of a personal sum of money which CS-1 was allowed to retain. These searches were negative in all other respects. Further, CS-1 was equipped with an audio/video recording device, a transmitter and given \$2,100 in pre-recorded funds.

44. At approximately 9:30 a.m., CS-1, driving CS-1's vehicle, departed and was surveilled driving to the vicinity of 1800 South Wentworth Avenue, Chicago, Illinois. At that location, the Toyota 4-Runner was observed parked and occupied by YIYI SHI and SONG YAN SHI.<sup>30</sup> Thereafter, CS-1 was observed briefly entering the Toyota 4-Runner.<sup>31</sup> Subsequently, SONG YAN SHI and CS-1 entered a Toyota Camry bearing Illinois license plate, 9393578 ("Toyota Camry[2]").<sup>32</sup> Subsequently, SONG YAN SHI, driving the Toyota Camry[2], departed with CS-1

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<sup>30</sup> SONG YAN SHI was identified based upon physical surveillance, a review of an ISOS driver's license photograph, information provided by CS-1 as well as a review of ICE records. Based upon information from CS-1, SONG YAN SHI is believed to be the nephew of YIYI SHI. Between approximately November of 2006 and September of 2007, law enforcement officers have observed SONG YAN SHI at an ISOS Driver Services Facility on approximately six occasions.

<sup>31</sup> A review of the video and audio recordings obtained by CS-1 revealed that YIYI SHI provided additional instruction to CS-1 regarding taking the ISOS Driver's License Written Examination. A review of the video recording revealed YIYI SHI showing CS-1 an apparent answer sheet and a document appearing similar to the ISOS Driver's License Written Examination. Further, YIYI SHI stated, "You go inside (Driver Services Facility), just go there first and get your ID done." Further, YIYI SHI stated, "I will have this young man (SONG YAN SHI) take you there." CS-1 asked if SONG YAN SHI had CS-1's documents and YIYI SHI stated, "Right, he (SONG YAN SHI) has all the documents (PRC passport, social security account card and a proof of residency).

<sup>32</sup> A review of ISOS vehicle registration records revealed that license plate 9393578 was registered to CO-CONSPIRATOR B with an address of 3139 South Normal Avenue, 1st Floor, Chicago, Illinois. Based upon information from CS-1, CO-CONSPIRATOR B is believed to be the niece of YIYI SHI.

as a passenger.

45. A review of the video recording obtained by CS-1 revealed that SONG YAN SHI provided CS-1 a social security account card and a passport. A review of the recorded conversation revealed that SONG YAN SHI stated, "Let me tell you, er, sign your name here in your passport" and further instructed CS-1 to memorize the date of birth listed in the passport. SONG YAN SHI stated, "Sometimes they (ISOS) do check on you, to see that if your date of birth matches that on the social security card." CS-1 questioned if CS-1 could be arrested if there was a problem and SONG YAN SHI stated, "No," and stated, "I (SONG YAN SHI) took someone inside (Driver Services Facility) to do this yesterday and the day before yesterday, I did another one." SONG YAN SHI advised that problems sometimes arise with the social security account cards because, "[T]he social security card itself is real, but when we purchased the social security card, the seller didn't remember the exact date of birth." Based upon information provided by ISOS/OIG, Affiant is aware that prior to issuing a driver's license or identification card, an applicant's social security account number is cross-referenced with the Social Security Administration to verify the date of birth. Also during this conversation, SONG YAN SHI instructed CS-1 to enter the facility and say, "I want my ID" and after everything is done, CS-1 should come back to SONG YAN SHI's vehicle.

46. At approximately 10:05 a.m., law enforcement observed Toyota Camry[2] park at the ISOS Driver Services Facility located at 5301 West Lexington Avenue, Chicago, Illinois ("Chicago West Facility"), at which time, CS-1 entered the Chicago West Facility. At approximately 10:50 a.m., CS-1 was observed exiting the Chicago West Facility. Shortly thereafter, SONG YAN SHI, driving Toyota Camry[2], entered the Chicago West Facility parking lot and picked-up CS-1. For approximately five minutes, SONG YAN SHI and CS-1 discussed CS-1 taking

the ISOS Vehicle Road Test and processing CS-1's driver's license. A review of the recorded conversation revealed that SONG YAN SHI advised, "No road test today. We don't have enough time here. Today, inside, they don't have time to finish it. The other side, is unable to make it." Further, SONG YAN SHI stated, "Certain people came down here, no way to get done it (obtain driver's license without taking the ISOS Vehicle Road Test). Do you understand? We have to wait until tomorrow." Affiant believes that SONG YAN SHI was making reference to the fact that a corrupt ISOS Public Service Representative ("the other side") was unavailable to assist CS-1 with obtaining a driver's license without taking the ISOS Vehicle Road Test and therefore CS-1 would actually have to take the ISOS Vehicle Road Test, to which CS-1 agreed.

47. At approximately 10:55 a.m., CS-1 re-entered the Chicago West Facility.<sup>33</sup> At approximately 12:45 p.m., SONG YAN SHI, driving Toyota Camry[2], was observed driving in the parking lot and picking-up CS-1, who had just exited the Chicago West Facility. While in the parking lot, Toyota Camry[2] parked and a Toyota Camry, bearing Illinois license plate T417563 ("Toyota Camry[3]"),<sup>34</sup> which was driven by CO-CONSPIRATOR B,<sup>35</sup> parked nearby. Thereafter, SONG YAN SHI and CS-1 entered Toyota Camry[3] and CO-CONSPIRATOR B entered the driver's seat of Toyota Camry[2]. SONG YAN SHI then briefly drove CS-1 around the vicinity of the Chicago West Facility and returned to the Chicago West Facility parking lot at approximately 12:58 p.m. A review of the recorded conversation, revealed that SONG YAN SHI was instructing

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<sup>33</sup> A review of the video recording obtained by CS-1 revealed that CS-1 was provided a vehicle insurance card by SONG YAN SHI prior to CS-1 entering the Chicago West Facility.

<sup>34</sup> A review of ISOS vehicle registration records revealed that license plate T417563 was registered to YIYI SHI with an address of 1930 South Louie Parkway, Chicago, Illinois.

<sup>35</sup> CO-CONSPIRATOR B was identified based upon physical surveillance, a review of an Illinois driver's license photograph as well as information provided by CS-1.

CS-1 how to take the ISOS Vehicle Road Test. Further, around this same time, SONG YAN SHI had a telephone conversation, portions of which were recorded by CS-1's recording device. Based on the context of the conversation, CS-1 and law enforcement believe that SONG YAN SHI was speaking with YIYI SHI. During this conversation, SONG YAN SHI stated, "No problem, let [CS-1] take the test first, after that, I will call [CO-CONSPIRATOR B] to come over."

48. CS-1 then entered Toyota Camry[2] and was driven by CO-CONSPIRATOR B to the ISOS Vehicle Road Test lane. A review audio and video recording obtained by CS-1 revealed that CO-CONSPIRATOR B instructed CS-1 to adjust CS-1's seat and that CS-1 would have to, "[S]how them (ISOS Public Service Representative) all of these (ISOS documents)." Further, CS-1 stated, "I told HUATI (YIYI SHI) that I would rather pay someone for it (driver's license) so that I don't have to take the road test." CO-CONSPIRATOR B inquired as to why CS-1 did not want to take the test and then advised that CO-CONSPIRATOR B would be waiting for CS-1 inside the Chicago West Facility.

49. Thereafter, CS-1, driving Toyota Camry[2], initiated the vehicle road test with an ISOS Public Service Representative as a passenger. During this test, CS-1 intentionally failed as directed by law enforcement officers. At approximately 1:16 p.m., CS-1 returned from the vehicle road test and then entered the Chicago West Facility.

50. At approximately 1:23 p.m, CS-1 exited the Chicago West Facility and was picked-up by CO-CONSPIRATOR B, who was driving Toyota Camry[2]. Thereafter, CO-CONSPIRATOR B and CS-1 met with YIYI SHI who was waiting in the Chicago West Facility parking lot. A review of the recorded conversation obtained by CS-1 revealed that CO-CONSPIRATOR B stated, "(CS-1) failed to pass." YIYI SHI stated, "Today, at the other side, certain people showed up, there is no

way to get ID done over there." Affiant believes that YIYI SHI was referring to the fact that the corrupt ISOS Public Service Representative who had been assisting YIYI SHI's customers was unable to assist CS-1 with obtaining a driver's license without taking the ISOS Vehicle Road Test. YIYI SHI then stated, "Just go home, you can take the test anywhere in the state" and CO-CONSPIRATOR B stated, "As long as you take it in the state of Illinois, you can take it." Also during this conversation, YIYI SHI told CS-1, "Give me 1,500 more," at which time, CS-1 attempted to negotiate with YIYI SHI to provide only \$1,000, since CS-1 had not successfully obtained a driver's license yet. Thereafter, YIYI SHI became upset with CS-1 and advised, "It cost me more than that (\$1,000) to get it (to obtain PRC passport and social security account card from a manufacturer)." CS-1 later advised law enforcement officers that CS-1 provided \$1,500 and the PRC passport, which contained CS-1's photograph, back to YIYI SHI at that time.

51. At approximately 1:30 p.m., CO-CONSPIRATOR B, driving Toyota Camry[2], drove CS-1 from the Chicago West Facility back to CS-1's vehicle. Thereafter, CS-1 departed in CS-1's vehicle and was surveilled to a pre-determined location, whereat CS-1 met with law enforcement officers. Subsequently, the audio/video recording device and transmitter were recovered from CS-1. Further, CS-1 provided law enforcement officers a piece of paper which contained numbers and Chinese writing relating to the memorization scheme utilized by CS-1 to pass the Illinois Driver's License Written Examination, a social security account card bearing an account number with the prefix "586,"<sup>36</sup> an Illinois identification card bearing CS-1's picture, an

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<sup>36</sup> Laboratory analysis of this social security account card is pending.

Illinois Driver's Permit<sup>37</sup> and \$600 in unused pre-recorded funds. Thereafter, CS-1 and CS-1's vehicle were searched for Contraband. This search revealed that CS-1 was in possession of a personal sum of money, but was negative in all other respects.

52. Six days later, on January 29, 2007, CS-1 met with law enforcement officers for the purpose of conducting a consensually recorded meeting with YIYI SHI. At approximately 10:09 a.m., CS-1 conducted a consensually recorded telephone call with YIYI SHI, at which time, YIYI SHI told CS-1 to meet YIYI SHI in thirty minutes by YIYI SHI's residence. Thereafter, CS-1 and CS-1's vehicle were searched for Contraband. These searches revealed that CS-1 was in possession of a personal sum of money which CS-1 was allowed to retain, but the searches were negative in all other respects. Further, CS-1 was equipped with an audio/video recording device, a transmitter as well as provided with \$600 in pre-recorded funds. Additionally, CS-1 was provided with the Illinois identification card, social security account card and Illinois Driver's Permit, all of which were obtained by CS-1 on January 22, 2007. Shortly thereafter, CS-1 departed in CS-1's vehicle as followed by law enforcement officers.

53. At approximately 11:00 a.m., CS-1 parked in the vicinity of 2006 South Wentworth Avenue, Chicago, Illinois and was then observed approaching YIYI SHI who was talking to an unknown Asian male ("COURIER A") driving a blue Lexus, bearing Wisconsin license plate 783LGK ("Lexus"). A review of the recorded conversation revealed that YIYI SHI advised CS-1 to ride with the driver of the Lexus to "95th Street" and that the two individuals ("CUSTOMER A and CUSTOMER B"), in the back seat, were also going to "95th Street." Based upon other physical

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<sup>37</sup> The Driver's Permit is a receipt which demonstrates that an individual has passed the ISOS Driver's License Written Examination.

surveillance, a review of recorded conversations and information provided by CS-1, Affiant is aware that the term "95th Street" is utilized to represent the ISOS Driver's Services Facility located at 9901 South Martin Luther King Jr. Drive, Chicago, Illinois ("Chicago South Facility"). Further, YIYI SHI provided instruction to CS-1 relative to CS-1 entering the Chicago South Facility and requesting to take the ISOS Vehicle Road Test. A query of Wisconsin vehicle registration records revealed that license plate 783LGK was registered to INDIVIDUAL 3 with an address of 8945 North Park Plaza Court, Brown Deer, Wisconsin. Approximately a minute later, CS-1 entered the Lexus, which was also occupied by CUSTOMER A and CUSTOMER B. Law enforcement then surveilled the Lexus to the Chicago South Facility.

54. At approximately 11:16 a.m., the Lexus arrived at the Chicago South Facility and shortly thereafter, CS-1 was observed entering the facility. At approximately 12:06 p.m., CS-1 exited the Chicago South Facility and entered the Lexus, driven by COURIER A, and was surveilled driving to the Hook-N-Fish Chicken Shack located at 350 East 103rd Street, Chicago, Illinois. At approximately 12:18 p.m., YIYI SHI, driving the Toyota 4-Runner, was observed driving into the Hook-N-Fish Chicken Shack, at which time, law enforcement briefly lost visual contact with the Lexus and Toyota 4-Runner.<sup>38</sup> Approximately a minute later, YIYI SHI was observed departing the Hook-N-Fish Chicken Shack. At approximately 12:29 p.m., law enforcement observed YIYI SHI, driving the Toyota 4-Runner, park next to the Lexus at the Hook-N-Fish Chicken Shack.

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<sup>38</sup> CS-1 later advised law enforcement that while parked, YIYI SHI arrived and took an ISOS road test score sheet which was in CS-1's possession. A review of the video recording obtained by CS-1, confirmed that CS-1 handed documents to YIYI SHI. When an applicant for an Illinois driver's license takes the ISOS Vehicle Road Test, a road test score sheet is prepared by the ISOS Public Service Representative who administered the test. This road test score sheet indicates whether the applicant passed or failed and bears the ISOS Public Service Representative's signature, initials or employee number.

Thereafter, CS-1 was observed briefly entering the Toyota 4-Runner and then CS-1 returned to the Lexus.

55. CS-1 later advised law enforcement that upon returning, YIYI SHI provided the ISOS road test score sheet back to CS-1, however, CS-1 observed that the form now bore handwriting. A review of the video recording obtained by CS-1 showed YIYI SHI providing a road test score sheet to CS-1, CS-1 signing the sheet and then CS-1 maintaining the road test score sheet. Additionally, a review of the recorded conversation revealed that YIYI SHI provided instruction to CS-1 relative to entering the Chicago South Facility and having CS-1's photograph taken in order for CS-1 to obtain a driver's license.

56. Thereafter, the Lexus was observed driving to the Chicago South Facility, where CS-1 entered the facility. At approximately 12:55 p.m., CS-1 and CUSTOMER A exited the Chicago South Facility and were picked up by YIYI SHI, who was driving the Toyota 4-Runner. At approximately 12:58 p.m., the Toyota 4-Runner was observed parking at Popeye's Chicken located at 346 East 95th Street, Chicago, Illinois.<sup>39</sup> At approximately 1:20 p.m., the Toyota 4-Runner relocated to a Mobile station located at 4 East 95th Street, Chicago, Illinois. At that location, CS-1 exited the Toyota 4-Runner and departed in the Lexus, driven by COURIER A. At approximately 1:49 p.m., CS-1 was dropped-off at CS-1's vehicle, at which time, CS-1 departed in CS-1's vehicle and was surveilled by law enforcement to a pre-determined location.

57. Thereafter, the audio/video recording device and transmitter were recovered from CS-

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<sup>39</sup> CS-1 later advised law enforcement officers that during this time, CS-1 provided \$600 to YIYI SHI which represented CS-1's final amount due to YIYI SHI relative to CS-1 obtaining a driver's license. A review of the video recording obtained by CS-1 showed CS-1 counting a sum of currency in the presence of YIYI SHI.

1. Further, CS-1 provided law enforcement officers with an Illinois driver's license, bearing CS-1's photograph, and the social security account card and Illinois identification card previously obtained by CS-1 on January 22, 2007. Further, CS-1 and CS-1's vehicle were searched for Contraband. These searches revealed that CS-1 was in possession of a personal sum of money, but were negative in all other respects. Thereafter, CS-1 advised law enforcement officers that while inside the Chicago South Facility, CS-1 utilized the ISOS documents provided by YIYI SHI and was able to obtain a driver's license without taking the ISOS Vehicle Road Test.

58. Based upon a review of ISOS records, it was determined that ISOS Public Service Representative A ("PSR-A") was listed as having conducted the ISOS Vehicle Road Test for CS-1. Further, the review revealed that ISOS Public Service Representative B ("PSR-B") was responsible for further processing CS-1's application following approval by PSR-A. Based upon physical surveillance and a review of ISOS records, it is known that CUSTOMER A and CUSTOMER B also obtained driver's licenses, on January 29, 2007, without taking the ISOS Vehicle Road Test. A review of ISOS applications and road test score sheets relative to CUSTOMER A and CUSTOMER B revealed that PSR-A was listed as having conducted the ISOS Vehicle Road Test and PSR-B was listed as having processed the corresponding application. A further review of ISOS applications and road test score sheets revealed that on January 29, 2007, at least three additional Asian males ("CUSTOMER C", "CUSTOMER D", "CUSTOMER E") obtained driver's licenses in which the associated applications listed that PSR-A administered the ISOS Vehicle Road Test and that PSR-B processed the applications. Based upon a review of vehicle and license plate information listed in applications for CUSTOMER C, CUSTOMER D and CUSTOMER E, and further investigation, Affiant believes that the vehicle and license plate information listed on the application was

fabricated by an ISOS Public Service Representative. Correspondingly, Affiant believes that CUSTOMER C, CUSTOMER D and CUSTOMER E also obtained driver's licenses without taking the ISOS Vehicle Road Test.

**F. January 30, 2007: Review of Driver's License Applications by ISOS/OIG at the Chicago South Facility**

59. On January 30, 2007, Inspectors from ISOS/OIG interviewed an ISOS employee ("ISOS EMPLOYEE A") who was assigned to the Chicago South Facility. During this interview, ISOS EMPLOYEE A advised that ISOS EMPLOYEE A believed that approximately sixty-one customer applications or road test score sheets had been fraudulently manipulated during the month of January (2007). More specifically, based on ISOS EMPLOYEE A's review of ISOS records, ISOS EMPLOYEE A believed that someone had forged the ISOS employee number and initials of five different Public Service Representatives who were responsible for conducting Vehicle Road Tests at the Chicago South Facility. Further, ISOS EMPLOYEE A advised that all of the applications appeared to relate to customers who were ethnic Chinese. Based upon a review of the road test score sheets by ISOS EMPLOYEE A, ISOS EMPLOYEE A believed the handwriting on some of the forged road test score sheets appeared consistent with that of Chicago South Facility

employee, TIMOTHY JOHNSON.<sup>40</sup> ISOS EMPLOYEE A was familiar with the handwriting of TIMOTHY JOHNSON prior to the review. Additionally, ISOS EMPLOYEE A advised that ISOS EMPLOYEE A became aware of the problem as a result of ISOS EMPLOYEE A reviewing documents which listed the employee number and initials of an employee who ISOS EMPLOYEE A knew had not been conducting ISOS Vehicle Road Tests on a particular day.

60. Subsequently, ISOS/OIG Inspectors showed the approximately sixty-one suspected forged documents to the ISOS employees which were listed on such documents. In all cases, the employees interviewed indicated that the initials and employee numbers were fraudulent and had not been made by that respective employee.

**G. May 21, 2007: Physical Surveillance of TIANSHENG ZHANG and WENYUAN ZHOU**

61. As explained below, based upon extensive physical surveillance, toll record analysis and a review of ISOS records, it is believed that TIANSHENG ZHANG and WENYUAN ZHOU were brokers who worked with JUN YUN ZHANG. On May 21, 2007, law enforcement officers conducted surveillance in the vicinity of the Chicago South Facility. At approximately 11:45 a.m.,

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<sup>40</sup> Based on ISOS records, on or about November 21, 2003, TIMOTHY JOHNSON was hired by the ISOS as a Public Service Representative and was assigned to the Chicago South Facility. An ISOS/OIG Inspector interviewed INDIVIDUAL 4 on November 10, 2005 in an unrelated matter. At the time, INDIVIDUAL 4 operated a driving school in the Chicago area. During this interview, INDIVIDUAL 4 advised that on September 16, 2005, INDIVIDUAL 4 had a driving student who obtained an Illinois driver's license, but the student had paid TIMOTHY JOHNSON \$100 in order to pass the ISOS Vehicle Road Test. During the course of an interview with INDIVIDUAL 4, INDIVIDUAL 4 conducted an in-person identification of TIMOTHY JOHNSON for the ISOS/OIG Inspector. A subsequent review of ISOS records relative to INDIVIDUAL 4's student revealed that TIMOTHY JOHNSON was listed as being the individual who administered the ISOS Vehicle Road Test.

TIANSHENG ZHANG<sup>41</sup> was observed driving a Mazda 6, bearing Illinois license plate 7091137 ("Mazda 6"),<sup>42</sup> into the Chicago South Facility's parking lot. Subsequently, TIANSHENG ZHANG was observed picking-up an Asian male ("CUSTOMER F") who had exited the Chicago South Facility. Thereafter, TIANSHENG ZHANG was surveilled transporting CUSTOMER F to the vicinity of 2228 South Archer Avenue, Chicago, Illinois, where CUSTOMER F exited the Mazda 6. Several minutes later, law enforcement officers observed CUSTOMER F remove a card from his wallet and show it to another Asian male who was standing in the vicinity.

62. At approximately 12:03 p.m., a Chevrolet Venture, bearing Illinois license plate 9408953,<sup>43</sup> driven by WENYUAN ZHOU<sup>44</sup> was observed entering the Chicago South Facility parking lot. At approximately 12:31 p.m., an Asian female ("CUSTOMER G") exited the Chevrolet Venture and entered the Chicago South Facility. For approximately the next three hours, CUSTOMER G and WENYUAN ZHOU were observed entering and exiting the Chicago South Facility at various times. At approximately 3:32 p.m., WENYUAN ZHOU was observed transporting CUSTOMER G from the Chicago South Facility to the vicinity of 3250 South Kedzie

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<sup>41</sup> TIANSHENG ZHANG was identified by law enforcement through physical surveillance, a review of an Illinois driver's license photograph and a review of ISOS and ICE records.

<sup>42</sup> A query of ISOS vehicle registration records revealed that license plate 7091137 was registered to INDIVIDUAL 5 with an address of 235 West 26th Street, 2nd floor, Chicago, Illinois. Based upon a review of ICE records, INDIVIDUAL 5 is believed to be TIANSHENG ZHANG's father.

<sup>43</sup> A query of ISOS vehicle registration records revealed that license plate 9408953 was registered to INDIVIDUAL 6.

<sup>44</sup> WENYUAN ZHOU was identified based upon physical surveillance, a review of a CPD arrest photograph, a review of ICE records as well as information provided by CS-2. WENYUAN ZHOU has also obtained an Illinois driver's license and an Illinois identification card in the identity of "Guian Zhao."

Avenue, Chicago, Illinois. Based upon a review of ISOS records, it was determined that CUSTOMER G was not allowed to apply for a driver's license or identification card on May 21, 2007 for an undetermined reason. However, on July 13, 2007, CUSTOMER G applied for and was issued a driver's license. In connection with obtaining the driver's license, CUSTOMER G utilized a social security account number with the prefix, "348."<sup>45</sup>

63. During this investigation, law enforcement has reviewed approximately 1676 ISOS driver's license and identification card applications from approximately 2006 to 2008 of which approximately 616 driver's license applications listed the license plate of the vehicle which was utilized during the ISOS Vehicle Road Test. This review determined that approximately 42 driver's license applications listed license plate 7091137 (Mazda 6), which is known to be utilized by TIANSHENG ZHANG. A further review revealed that approximately 29 of the 42 applicants utilized social security account numbers with the prefix "586." Based upon the investigation to date, Affiant believes that these applications likely correspond with customers assisted by TIANSHENG ZHANG. Between approximately November 2006 and May 2008, law enforcement observed TIANSHENG ZHANG on approximately 14 occasions at various ISOS Driver Services Facilities.

64. Additionally, pursuant to the review of the aforementioned applications, it was determined that approximately four driver's license applications listed license plate 9408953 (Chevrolet Venture), which is known to be utilized by WENYUAN ZHOU. A further review revealed that approximately three of those applicants utilized social security account numbers with

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<sup>45</sup> As will be set forth throughout this Affidavit, this criminal enterprise predominately utilizes social security account numbers with the prefix "586," however, other social security account numbers have also been utilized.

the prefix "586."

**H. May 23, 2007: Physical surveillance of DONG DONG GUO and JUN XI ZHANG**

65. On May 23, 2007, law enforcement officers conducted surveillance at the ISOS Driver Services Facility located at 5401 North Elston Avenue, Chicago, Illinois ("Chicago North Facility"). At approximately 4:38 p.m., DONG DONG GUO<sup>46</sup> and two other Asian males were observed exiting a Toyota Rav4, bearing Illinois license plate 6229240 ("Toyota Rav4"),<sup>47</sup> which was parked in the lot associated with the Chicago North Facility, and then entering the Chicago North Facility. At approximately 4:51 p.m., DONG DONG GUO and three Asian males exited the Chicago North Facility and walked toward the Toyota Rav4, at which time, one of the Asian males ("CUSTOMER H") entered the vehicle while DONG DONG GUO appeared to be giving the Asian male instructions. Thereafter, CUSTOMER H, driving the Toyota Rav4, was observed entering the vehicle road test lane at the Chicago North Facility. At approximately 5:10 p.m., the Toyota Rav4 was observed parked in the Chicago North Facility parking lot with an ISOS employee in the passenger's side seat. Surveillance of the Toyota Rav4 was temporarily suspended at that time.

66. At approximately 6:03 p.m., the Toyota Rav4 was observed parking, along with a

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<sup>46</sup> An undercover officer, who has met with this individual, as well as other law enforcement officers have identified this individual based upon a review of an Illinois driver's license photograph issued in the name of DONG DONG GUO. However, based upon information provided by CS-1 as well as various computer database checks, to include those of ICE, it is believed that this individual illegally entered the U.S. and has assumed the identity of DONG DONG GUO.

<sup>47</sup> A query of ISOS vehicle registration records revealed that Illinois license plate 6229240 was registered to Jun X. Zhang (JUN XI ZHANG) at 239 West 24th Street, 1st Floor, Chicago, Illinois.

Toyota Solara, bearing Illinois license plate 9251439 ("Toyota Solara")<sup>48</sup> on the 200 block of West 24th Place, Chicago, Illinois. Shortly thereafter, DONG DONG GUO, CUSTOMER H and approximately two other Asian males exited from both vehicles and were observed standing in the vicinity of the vehicles. Subsequently, JUN XI ZHANG approached DONG DONG GUO and the three Asian males, at which time, two of the Asian males were observed showing an object, that was consistent with the size and shape of a driver's license or identification card, to JUN XI ZHANG.<sup>49</sup> At approximately 6:11 p.m., JUN XI ZHANG departed in the Toyota Rav4 and DONG DONG GUO departed in Toyota Solara.

67. A review of ISOS records revealed that CUSTOMER H obtained a driver's license on May 23, 2007 and that CUSTOMER H utilized a social security account number with the prefix, "086."

**I. June 11, 2007: Consensually Recorded Meeting Between CS-1 and JUN YUN ZHANG.**

68. On June 4 and 6, 2007, CS-1 advised law enforcement officers that "LAO SZE," who CS-1 identified as JUN YUN ZHANG from an Illinois driver's license photograph, was involved in physically altering PRC passports and was providing undocumented Chinese nationals with such altered passports as well as other fraudulent personal identification documents including authentic social security account cards. CS-1 was aware of JUN YUN ZHANG's operation because CS-1 had

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<sup>48</sup> A review of ISOS vehicle registration records revealed that license plate 9251439 is registered to QIONG ZHOU with an address of 2734 S. Wentworth, Unit 310, Chicago, Illinois. Based on surveillance and information from CS-1 and CD-1 as well as others, law enforcement believes that this address is a residence utilized by JUN YUN ZHANG and QIONG ZHOU.

<sup>49</sup> JUN XI ZHANG was identified based upon physical surveillance, a review of an ISOS driver's license photograph, as well as a review of ISOS and ICE records.

assisted in the fraudulent document operation from 1998 to 2000 as well as periodically between 2002 and 2005. While working for JUN YUN ZHANG, CS-1 assisted with transporting customers, who were seeking to purchase fraudulent documents, within the Chicago area as well as between New York and Chicago. CS-1 also traveled to New York in order to obtain passports and other fraudulent documents for JUN YUN ZHANG.

69. In addition, during periods when CS-1 was not working for JUN YUN ZHANG, CS-1 maintained contact with an individual who continued to work for JUN YUN ZHANG. Further, based on conversations and observations made by CS-1 during the period CS-1 worked for JUN YUN ZHANG and based on conversations with an individual that continued to work for JUN YUN ZHANG after CS-1 stopped working for JUN YUN ZHANG, CS-1 informed law enforcement officers that JUN YUN ZHANG assisted customers with utilizing the fraudulent documents to obtain driver's licenses. CS-1 further explained that if a customer was willing to take a ISOS Vehicle Road Test, JUN YUN ZHANG charged a fee of approximately \$2,200 to provide all the documents and to assist with obtaining a driver's license. Additionally, CS-1 stated that if a customer did not want to take the vehicle road test, JUN YUN ZHANG charged approximately \$2,500 due to the fact that JUN YUN ZHANG had to bribe corrupt employees at the ISOS Driver Services Facilities. CS-1 also stated that based upon conversations with JUN YUN ZHANG, CS-1 learned that JUN YUN ZHANG was making these bribe payments in order for employees at the ISOS Driver Services Facilities to forgo the customer's vehicle road test.

70. CS-1 further advised law enforcement that in approximately April or May 2004, CS-1 was assisting JUN YUN ZHANG by transporting JUN YUN ZHANG's customers to various ISOS Driver Services Facilities. CS-1 was also responsible for assisting such customers with using the

fraudulent documents obtained from JUN YUN ZHANG to obtain Illinois driver's licenses or identification cards and for providing a vehicle for the customers to utilize during the vehicle road test. During this time period, CS-1 assisted two to three of JUN YUN ZHANG's customers per day and was paid \$100 per customer by JUN YUN ZHANG and an additional \$100 if the customer passed the vehicle road test. Toward the end of 2004, JUN YUN ZHANG began referring the majority of customers to other brokers to include JUN YUN ZHANG's brother, "LAO SAN,"<sup>50</sup> and one of JUN YUN ZHANG's girlfriends, MEIZHU WANG,<sup>51</sup> who then began to perform the duties formerly handled by CS-1. Consequently, in 2005, CS-1 stopped working for JUN YUN ZHANG due to the fact that JUN YUE ZHANG's and MEIZHU WANG's involvement diminished CS-1's profits.

71. Based upon conversations and observations made by CS-1 during the period CS-1 worked for JUN YUN ZHANG and based on conversations with an individual that continued to work for JUN YUN ZHANG after CS-1 stopped working for JUN YUN ZHANG, CS-1 advised that at an unspecified time, JUN YUN ZHANG taught his girlfriend at the time the craft of manufacturing fraudulent documents to include the methods to alter PRC passports. CS-1 has identified an Illinois driver's license photograph of CO-CONSPIRATOR A as being that girlfriend.

72. On approximately June 7, 2007, CS-1 advised law enforcement officers that JUN

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<sup>50</sup> CS-1 identified a photograph of JUN YUE ZHANG as being "LAO SAN" and, further, identified JUN YUE ZHANG as being involved in JUN YUN ZHANG's fraudulent document operation. CS-1 knew of JUN YUE ZHANG's participation in the fraudulent document operation through statements made to CS-1 by JUN YUN ZHANG and through CS-1's prior employment with the fraudulent document operation involving JUN YUN ZHANG.

<sup>51</sup> CS-1 identified an Illinois driver's license photograph of MEIZHU WANG for law enforcement officers.

YUN ZHANG utilized mobile telephone number (646) 651-7388 ("**SUBJECT PHONE 1**").<sup>52</sup> CS-1 stated that he/she learned that JUN YUN ZHANG used **SUBJECT PHONE 1** during a conversation CS-1 had with JUN YUN ZHANG at an undetermined time and subsequently, CS-1 contacted JUN YUN ZHANG using **SUBJECT PHONE 1**.<sup>53</sup>

73. On June 11, 2007, at approximately 3:29 p.m., CS-1 met with law enforcement officers and participated in a consensually recorded telephone conversation with JUN YUN ZHANG.<sup>54</sup> During this conversation, CS-1 and JUN YUN ZHANG agreed to meet at JUN YUN ZHANG's residence, later identified as 2734 South Wentworth Avenue, Unit 310, Chicago, Illinois. JUN YUN ZHANG's residence was identified by information provided by CS-1, surveillance conducted on the residence by law enforcement officers and database checks by law enforcement, including ISOS records.

74. At approximately 3:42 p.m., CS-1 conducted a consensually recorded meeting with JUN YUN ZHANG at JUN YUN ZHANG's residence which was surveilled by law enforcement

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<sup>52</sup> Investigation revealed that **SUBJECT PHONE 1** was subscribed to by QIONG ZHOU with an address of 6705 Wescott Road, Falls Church, Virginia. As detailed further in this Affidavit, law enforcement believes that based upon Court authorized wire interceptions and physical surveillance, QIONG ZHOU is a girlfriend of JUN YUN ZHANG. Further, QIONG ZHOU appears to be involved in obtaining items such as telephones, vehicles and residences which are utilized by JUN YUN ZHANG in furtherance of manufacturing and selling fraudulent personal identification documents. Additionally, as referenced later in this Affidavit, based upon wire interceptions, QIONG ZHOU appears to be involved in referring potential customers to JUN YUN ZHANG and other manufacturers.

<sup>53</sup> Based upon a review of telephone records relative to **SUBJECT PHONE 1**, it is believed that service to **SUBJECT PHONE 1** was terminated in approximately December 2007.

<sup>54</sup> All consensually recorded conversations between CS-1 and JUN YUN ZHANG referenced in this Affidavit were obtained pursuant to a State of Illinois consensual overhear Court Order and were conducted in the Fuzhou Chinese language.

officers. A review of this recording and debriefing of CS-1 revealed the following: (a) CS-1 asked JUN YUN ZHANG if it was still easy to do the driver's license business, and JUN YUN ZHANG indicated, in part, that JUN YUN ZHANG was still engaging in the same business even though there was a risk of being arrested; (b) JUN YUN ZHANG stated that a lot of customers were coming from other states and stated, "As long as they allow those who don't have a green card to get a license, I am able to do it;" (c) JUN YUN ZHANG also advised CS-1 that JUN YUN ZHANG charged \$2,000 for a license if the individual could not present any documents, but charged only \$800 if the individual had documents; and (d) JUN YUN ZHANG stated, "When the black guy is absent, it is very hard to do this business," and also stated, "The black guy was caught, but he is still working." Based upon the context of the conversation, CS-1 understood that JUN YUN ZHANG's statement to mean that JUN YUN ZHANG was utilizing a black male to obtain driver's licenses without JUN YUN ZHANG's customers having to take ISOS Vehicle Road Test. During this conversation, CS-1 inquired about the social security account cards that JUN YUN ZHANG was able to obtain, at which time, JUN YUN ZHANG advised that all of the cards were authentic and stated, "I got them from those who returned. And there is no signature on the card."

75. Based upon conversations with law enforcement officers stationed in Saipan, Affiant is aware that, at times, Saipan has had numerous textile and garment factories which employed large numbers of Chinese nationals. Typically, these Chinese nationals lawfully entered Saipan and worked for a period of several years and then returned to the PRC. Affiant believes JUN YUN ZHANG's reference to receiving cards from "those who returned" is a reference to Chinese nationals who obtained social security account cards in Saipan and then returned to the PRC, at which time, they relinquished custody of the social security account cards.

76. Also during this meeting, JUN YUN ZHANG had a telephonic conversation on JUN YUN ZHANG's cellular telephone, portions of which were overheard by CS-1 and portions of which were recorded by CS-1's recording device. A review of the recording revealed that JUN YUN ZHANG directed an unknown caller to go to, "The second store at Confucius Plaza to buy ten some covers." CS-1 told officers that based upon the content and context of the conversation that CS-1 understood that JUN YUN ZHANG was directing the unknown caller to purchase ten or more passport covers<sup>55</sup> from a store in Confucius Plaza which is located in the Chinatown area of Manhattan in New York. Also during the meeting, CS-1 overheard JUN YUN ZHANG have a conversation on a cellular telephone. CS-1 was able to overhear portions of this telephone call as well. CS-1 told agents that, based on the content and context of the conversation, CS-1 believed that JUN YUN ZHANG was speaking with JUN YUE ZHANG and CS-1 told agents that CS-1 understood that JUN YUN ZHANG asked how many customers JUN YUE ZHANG had, at which time, JUN YUE ZHANG indicated that JUN YUE ZHANG had four customers. CS-1 also told agents that, based upon the content and context of the overheard conversation, CS-1 understood that JUN YUE ZHANG was advising JUN YUN ZHANG that JUN YUE ZHANG had assisted four customers with obtaining driver's licenses.<sup>56</sup> Also during this conversation, JUN YUN ZHANG

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<sup>55</sup> Based upon the investigation and information from CS-1, it is believed that "passport covers" may be a reference to only the front and back covers of a passport which have been physically removed from the interior pages of the passport. This belief is supported by laboratory analysis of PRC passports seized and covertly purchased during this investigation. Such PRC passports have been submitted to FDL for analysis. Analysis has revealed that almost all PRC passports submitted contain non-genuine thread which secures the passport covers to the interior pages. This finding indicates that the passports have been disassembled and reassembled.

<sup>56</sup> Due to background noise and the proximity of CS-1 to JUN YUN ZHANG, no portions of this conversation could be heard on the recording.

advised CS-1 that JUN YUN ZHANG's brothers, JUN YUE ZHANG and "LAO WU,"<sup>57</sup> had lots of customers.

77. A review of the recording also revealed that JUN YUN ZHANG encouraged CS-1 to recruit customers for JUN YUN ZHANG by placing advertisements in the newspapers or going to different driving schools. JUN YUN ZHANG advised CS-1 that JUN YUN ZHANG received a lot of customers from driving schools located in New York.

**J. Information Provided by CD-1 and CD-2 Relative to JUN YUN ZHANG, JUN SHUN ZHANG**

78. During interviews, CD-1 advised law enforcement officers that between approximately early 2004 and early 2008, CD-1 assisted numerous Korean "friends" (customers) with obtaining fraudulent personal identification documents to include social security account cards and Illinois identification cards or driver's licenses. Further, CD-1 advised that "Mr. Zhang" was involved in manufacturing fraudulent passports and selling such fraudulent passports and social security account cards in the Chicago Chinatown community. CD-1 identified a photograph of JUN YUN ZHANG as being "Mr. Zhang." CD-1 advised that from early 2007 through early 2008, CD-1 coordinated with JUN YUN ZHANG, on at least eight occasions, to obtain fraudulent personal identification documents for CD-1's personal use or for CD-1's "friends" or customers who utilized such documents to obtain Illinois driver's licenses or identification cards. When coordinating with JUN YUN ZHANG, CD-1 provided a passport photograph to JUN YUN ZHANG. JUN YUN ZHANG then altered a PRC passport to contain the provided photograph and altered the passport to match the identity of an authentic social security account card. When completed, JUN YUN

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<sup>57</sup> CS-1 identified an ISOS driver's license photograph of JUN XI ZHANG as being "LAO WU."

ZHANG typically contacted CD-1 by telephone to pickup the passport, social security account card and an addressed envelope, which CD-1 used to show residency for purposes of a driver's license or identification card application. Upon CD-1 or CD-1's customer obtaining a driver's license or identification card, CD-1 returned the passport back to JUN YUN ZHANG and paid a little more than a \$1,000 to JUN YUN ZHANG for supplying the identification documents. During these interviews, CD-1 identified approximately eight Illinois driver's license or identification card photographs of customers who CD-1 helped.

79. Additionally, CD-1 advised that in 2007, JUN YUN ZHANG allowed CD-1 into JUN YUN ZHANG's residence, where JUN YUN ZHANG demonstrated to CD-1 how JUN YUN ZHANG utilized a computer, printer and spray glue to alter PRC passports. CD-1 has identified a photograph of the building located at 2734 South Wentworth Avenue as being the building where JUN YUN ZHANG resided. CD-1 advised that JUN YUN ZHANG occupied two units in the building and that one of the units was either unit 408 or 410.<sup>58</sup> Further, during conversations with JUN YUN ZHANG in 2007, JUN YUN ZHANG told CD-1 that JUN YUN ZHANG's son (DONG DONG GUO) knew certain people at the "DMV" (ISOS) and therefore it was possible to obtain driver's licenses without taking the vehicle road test. CD-1 identified a photograph of DONG DONG GUO as being JUN YUN ZHANG's son. Moreover, during conversations with JUN YUN ZHANG, JUN YUN ZHANG advised CD-1 that all of the social security cards used by JUN YUN ZHANG were from Saipan.

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<sup>58</sup> Based upon physical surveillance conducted at 2734 South Wentworth Avenue, Chicago, Illinois, trash searches, and telephone subscriber information, it is believed that, at times, JUN SHUN ZHANG resided at 2734 South Wentworth Avenue, Unit 408, Chicago, Illinois, which is believed to be owned by QIONG ZHOU and also utilized by JUN YUN ZHANG.

80. Further, CD-1 advised law enforcement that in approximately 2007, CD-1 telephonically coordinated with JUN YUN ZHANG to prepare a set of documents, to include a passport and social security account card for one of CD-1's customers. Upon arriving at the building where JUN YUN ZHANG resided, CD-1 was instructed by JUN YUN ZHANG to provide CD-1's customer's passport photograph to JUN SHUN ZHANG<sup>59</sup> who subsequently met CD-1 on the first floor of the building and took the passport photograph from CD-1.

81. During an interview of CD-2, CD-2 advised law enforcement officers that CD-2 was a document broker who had worked with JUN YUN ZHANG. CD-2 identified a photograph of JUN SHUN ZHANG for law enforcement officers and advised that based upon conversations with JUN YUN ZHANG, CD-2 was aware that JUN SHUN ZHANG was assisting customers with obtaining driver's licenses. Further, CD-2 advised that in approximately 2007, JUN YUN ZHANG instructed CD-2 to give some customers to JUN SHUN ZHANG because JUN SHUN ZHANG did not have very many customers. CD-2 advised that CD-2 thereafter provided approximately five to six customers to JUN SHUN ZHANG.

**K. June 22, 2007: CS-2 Purchased Fraudulent Personal Identification Documents from GUOQI ZHANG.**

82. On June 21, 2007, CS-2 met with law enforcement officers and participated in a consensually recorded telephone conversation with GUOQI ZHANG. At approximately 11:43 a.m., CS-2 called GUOQI ZHANG and spoke with GUOQI ZHANG. During this conversation, CS-2 advised that CS-2 had a photograph for GUOQI ZHANG, which was a reference to a photograph to be used for the preparation of a fraudulent PRC passport. CS-2 and GUOQI ZHANG agreed to

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<sup>59</sup> CD-1 identified an Illinois driver's license photograph of JUN SHUN ZHANG.

meet later that day.

83. At approximately 12:54 p.m., law enforcement officers physically searched CS-2 and CS-2's vehicle for the presence of Contraband. CS-2 was found to be in possession of a personal sum of money which CS-2 was allowed to retain, but the search was negative in all other respects. Shortly thereafter, CS-2 was equipped with an audio/video recording device, a transmitter and provided with a passport photograph of an undercover officer ("UCO-1"), which was placed inside a blue passport photograph holder.

84. At approximately 1:05 p.m., CS-2 departed in CS-2's vehicle and followed by law enforcement officers. At approximately 1:16 p.m., CS-2 parked in a lot at 13001 South Ashland Avenue, Calumet Park, Illinois. At the same time, GUOQI ZHANG was observed parking the Toyota Camry[1] next to CS-2's vehicle. Several minutes later, GUOQI ZHANG was observed inside CS-2's vehicle. At approximately 1:47 p.m., GUOQI ZHANG was observed exiting CS-2's vehicle and departing in the Toyota Camry[1].

85. CS-2 was subsequently surveilled to a pre-determined location, at which time, the audio/video recording device and transmitter were recovered. Further, CS-2 and CS-2's vehicle were searched for the presence of Contraband. CS-2 was found to be in possession of the same amount of personal cash identified previously and was found to be no longer in possession of the passport photograph of UCO-1, otherwise the search results were negative. CS-2 informed law enforcement officers that while GUOQI ZHANG was inside CS-2's vehicle, CS-2 provided the passport photograph of UCO-1 to GUOQI ZHANG. A review of the video recording obtained by CS-2 revealed GUOQI ZHANG holding a blue passport-photograph holder.<sup>60</sup>

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<sup>60</sup> A review of GUOQI ZHANG's telephone records on June 21, 2008, revealed approximately six telephone calls with telephone number (312)363-7162. Based upon a wire

86. A review of the recorded conversation revealed that GUOQI ZHANG stated, "But nowadays, what do they want?" and CS-2 replied, "Eh, don't they just want a passport and a social security number? The same as last time." Later in the conversation, GUOQI ZHANG stated, "Nowadays it's \$3,500 to do a set," which CS-2 understood a "set" to mean a PRC passport and social security account card. During the conversation, CS-2 and GUOQI ZHANG agreed to meet at 9:00 p.m. on June 22, 2007.

87. At approximately 2:25 p.m., CS-2 called GUOQI ZHANG at the direction of law enforcement officers in order to negotiate a lower purchase price for the documents. This conversation was not recorded due to the inability of law enforcement officers to meet with CS-2 at that time. CS-2 was directed to make this call due to the fact that law enforcement only had \$3,200 available to purchase the PRC passport and social security account card. During the call, GUOQI ZHANG agreed to the \$3200 purchase price.

88. On June 22, 2007, CS-2 met with law enforcement officers for the purpose of conducting a recorded meeting with GUOQI ZHANG. At approximately 8:43 p.m., CS-2 and CS-2's vehicle were searched for the presence of Contraband. CS-2 was found to be in possession of a personal sum of money which CS-2 was allowed to retain, but the search was negative in all other

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interception, it is believed this telephone number (312)363-7162 is utilized by an individual involved in brokering fraudulent documents. More specifically, on September 8, 2008, at approximately 11:41 a.m. (Call #239), JUN YUN ZHANG, utilizing **TARGET PHONE 1**, called an unknown male at telephone number (312)363-7162. During this conversation, JUN YUN ZHANG asked if the unknown male wanted to do business and the unknown male responded affirmatively. JUN YUN ZHANG stated that JUN YUN ZHANG temporarily stopped business and that the unknown male should contact "LAO SAN" (JUN YUE ZHANG) at telephone number (312)545-7794. Based upon the content and context of the conversation, Affiant believes that JUN YUN ZHANG was advising the unknown male to coordinate with JUN YUE ZHANG relative to obtaining fraudulent documents.

respects. Shortly thereafter, CS-2 was equipped with an audio/video recording device, a transmitter and was provided with \$3,200 in pre-recorded funds, which was the amount of money that CS-2 and GUOQI ZHANG agreed to on a previously unrecorded call.

89. At approximately 8:52 p.m., CS-2 departed in CS-2's vehicle and was followed by law enforcement officers. Approximately five minutes later, CS-2 parked in the previously described Chinatown Walgreen's parking lot, which was the location agreed upon by CS-2 and GUOQI ZHANG during a previous unrecorded telephone call. At approximately 9:31 p.m., law enforcement officers observed GUOQI ZHANG, driving Toyota Camry[1], park in the Chinatown Walgreens lot and subsequently, GUOQI ZHANG entered CS-2's vehicle. At approximately 9:37 p.m., GUOQI ZHANG exited CS-2's vehicle and departed in the Toyota Camry[1]. CS-2 subsequently departed and was surveilled to a pre-determined location.

90. Thereafter, CS-2 met with law enforcement officers and the audio/video recording device and transmitter were recovered. Also at this time, CS-2 provided law enforcement officers with a biographically-matched PRC passport<sup>61</sup> and social security account card.<sup>62</sup> Further, CS-2 and CS-2's vehicle were searched for the presence of Contraband. CS-2 was found to be in possession

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<sup>61</sup> The name, sex and date of birth listed in this passport matched the identity associated with the purchased social security account card. The PRC passport was submitted to the FDL. A review of the FDL report reflects that the biographical/photograph page with the security laminate and the last page of the passport had been substituted with counterfeit pages. These counterfeit pages were produced with color ink-jet printing technology and did not conform to comparable genuine specimens on file in the FDL library. Further, based upon the presence of non-original threading, the passport had been disassembled and reassembled.

<sup>62</sup> This social security account card, which lists an account number with the prefix "586," was submitted to the FDL. A review of the FDL report reflects that this card was authentic and had not been altered. Based upon information provided by the SSA-OIG, this social security account card was originally issued in Saipan in 2000.

of only the same amount of personal cash identified previously, but the search was negative in all respects.

91. Additionally, CS-2 advised law enforcement officers that when GUOQI ZHANG arrived at the Chinatown Walgreens, GUOQI ZHANG entered CS-2's vehicle. While inside CS-2's vehicle, GUOQI ZHANG handed CS-2 a PRC passport and a social security account card, bearing account number 586-43-XXX ("SSAN-1"). Further, CS-2 advised that CS-2 provided \$3,200 to GUOQI ZHANG at that time.

#### **L. Analysis of SSAN-1**

92. A review of ISOS records relative to SSAN-1 revealed that an Illinois driver's license had been issued prior to June 22, 2007 based upon an applicant that utilized SSAN-1. Specifically, a driver's license was issued in the identity of IDENTITY A,<sup>63</sup> with a residential address of 1058 West 32nd Street, Chicago, Illinois. A review of the associated driver's license photograph revealed that the photograph depicted RONG SI, who is known to also possesses an Illinois driver's license

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<sup>63</sup> In an effort to determine if the individual, who was originally issued SSAN-1, ever entered the U.S. under IDENTITY A, a review was conducted of immigrant visa and non-immigrant visa records maintained by the U.S. Department of State. This review revealed that no visa applications had been made under IDENTITY A. It should be noted, that the issuance of a visa means that a U.S. consular officer has reviewed the associated visa application and that the U.S. consular officer has determined that the applicant was eligible to enter the U.S. for a specific purpose.

in the name of RONG SI.<sup>64</sup>

93. Based upon physical surveillance, including surveillance conducted on November 26, 2007, as well as a review of ISOS records, law enforcement is aware that RONG SI utilizes residences at 1319 West 31st Place, Chicago, Illinois as well as at 1058 West 32nd Street, Chicago, Illinois. Based upon surveillance, CO-CONSPIRATOR A is known to also utilize 1058 West 32nd Street as well as 1317 West 31st Place, Chicago, Illinois, which is located adjacent to 1319 West 31st Place. A review of ISOS records revealed that between approximately January 2007 and November 2008, approximately 26 Illinois driver's licenses and identification cards were issued to applicants who utilized social security account numbers with the prefix "586" and who utilized the residential addresses of 1317 West 31st Place, 1319 West 31st Place or 1058 West 32nd Street.

94. Based upon information provided by CS-1, physical surveillance and telephone record analysis, it is believed that RONG SI is a broker who works with manufacturer, CO-CONSPIRATOR A. Moreover, CD-2 has advised law enforcement that, in approximately 2007, CD-2 observed RONG SI helping customers obtain drivers licenses at two separate ISOS Driver Services Facilities. On one occasion, RONG SI approached CD-2 and asked if CD-2 could provide passports to RONG SI and further inquired about the cost of such passports.

**M. June 28, 2007: Physical surveillance of RONG SI and MEIZHU WANG at the Bridgeview Facility**

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<sup>64</sup> In January of 2003, CS-2 advised law enforcement officers that based upon unrecorded conversations with RONG SI, CS-2 learned that RONG SI was involved in a sham marriage in order to obtain legal immigration status in U.S. Further, on January 28, 2008, CS-1 advised law enforcement officers, that based upon CS-1's prior involvement with JUN YUN ZHANG's fraudulent document operation, CS-1 was aware through JUN YUN ZHANG that RONG SI was involved in assisting individuals with fraudulently obtaining Illinois driver's licenses. CS-1, CS-2 and law enforcement have identified RONG SI through an Illinois driver's license photograph of RONG SI, which was issued in the name of RONG SI, as well as through ICE records.

95. On June 28, 2007, law enforcement conducted a surveillance at the ISOS Driver Services Facility located at 7200 West 84th Street, Bridgeview, Illinois ("Bridgeview Facility"). At approximately 1:58 p.m., MEIZHU WANG,<sup>65</sup> driving a Toyota Yaris bearing Wisconsin license plate, 364LJP,<sup>66</sup> was observed entering the vehicle road test lane at the Bridgeview Facility. Thereafter, an Asian female ("CUSTOMER I") relocated from the passenger seat of the Toyota Yaris to the driver's seat and began the ISOS Vehicle Road Test.

96. At approximately 2:15 p.m., an Asian Female ("CUSTOMER J") was observed exiting the Bridgeview Facility and approaching RONG SI, at which time, both entered a Dodge Caravan bearing Illinois license plate, 1219319.<sup>67</sup> Several minutes later, CUSTOMER I returned from the vehicle road test, exited the Toyota Yaris, at which time, MEIZHU WANG entered and drove the Toyota Yaris to the rear of the facility parking lot.<sup>68</sup>

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<sup>65</sup> MEIZHU WANG has been identified through physical surveillance, an Illinois driver's license photograph as well as information provided by CS-1. On January 28, 2008, CS-1 advised law enforcement officers that through observation, CS-1 knew that MEIZHU WANG was a former girlfriend of JUN YUN ZHANG and that MEIZHU WANG was involved with assisting customers with obtaining Illinois driver's licenses.

<sup>66</sup> A review of Wisconsin vehicle registration records revealed that Wisconsin license plate 364LJP was registered to MEIZHU WANG with an address of N46 W24278 Ivy Avenue, Sussex, Wisconsin.

<sup>67</sup> A review of ISOS vehicle records revealed that license plate 1219319 was registered to INDIVIDUAL 7 with an address of 3046 South Poplar Avenue, Chicago, Illinois. Based upon information provided CS-2 and another confidential source ("CS-3"), who has provided reliable information to the FBI, as well as ISOS records, INDIVIDUAL 7 is known to be RONG SI's boyfriend or husband with whom RONG SI has resided. Based upon a review of ISOS records, INDIVIDUAL 7 has obtained three Illinois driver's licenses, two of which are in alias identities. The two driver's licenses obtained in alias identities were obtained with social security account numbers which began with the prefix "586."

<sup>68</sup> A review of ISOS records revealed that CUSTOMER I obtained an identification card on June 27, 2007, and that CUSTOMER I failed the ISOS Vehicle Road Test on June 28, 2007.

97. At approximately 2:19 p.m., CUSTOMER J was observed entering the Bridgeview Facility with paperwork in her hand. At approximately 2:24 p.m., CUSTOMER I entered the Toyota Yaris, at which time, the Toyota Yaris departed driven by MEIZHU WANG. At approximately 2:47 p.m., CUSTOMER J returned to the Dodge Caravan and relocated the vehicle to the vehicle road test lane with RONG SI as a passenger. Thereafter, RONG SI was observed exiting the vehicle while an ISOS Public Service Representative began a vehicle functionality test to evaluate turn signals and brake lights. CUSTOMER J was then observed exiting the Dodge Caravan and entering the Bridgeview Facility, at which time, RONG SI entered the driver's seat of the Dodge Caravan and appeared to repeat the vehicle functionality test for the ISOS Public Service Representative, but then departed the vehicle road test lane at approximately 3:00 p.m. Between approximately 3:00 p.m. and 4:09 p.m., RONG SI was observed meeting with three Asian males in a strip mall adjacent to the Bridgeview Facility. These three Asian males arrived in a Honda CRV, bearing New York license plate, DWA4748.<sup>69</sup> Additionally, during this time, CUSTOMER J was observed eventually meeting with RONG SI and the three Asian males. Thereafter, CUSTOMER J was observed performing the ISOS Vehicle Road Test in the Honda CRV.

98. A review of ISOS records revealed that CUSTOMER J received a driver's license on June 28, 2007. Further, it was determined that CUSTOMER J, utilized a social security account number with the prefix "586" and utilized the address of 1058 West 32nd Street, 1st Floor, Chicago, Illinois. As previously mentioned, based upon physical surveillance this is an address known to be utilized by RONG SI and CO-CONSPIRATOR A.

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<sup>69</sup> A query of New York vehicle registration information revealed that license plate DWA4748 was registered to INDIVIDUAL 8 with an address of 144-03 Barclay Avenue, Flushing, NY.

**N. July 9, 2007: Physical Surveillance of SONG YAN SHI at the Chicago North Facility**

99. On July 9, 2007, law enforcement conducted a physical surveillance at the Chicago North Facility. During the course of this surveillance, SONG YAN SHI, driving a Honda Accord bearing Illinois license plate, X129419 ("Honda Accord[1]"),<sup>70</sup> was observed arriving at the Chicago North Facility with an Asian male passenger, ("CUSTOMER K"). During the course of this surveillance, CUSTOMER K utilized Honda Accord[1] to take the ISOS Vehicle Road Test. A review ISOS records revealed that CUSTOMER K obtained a driver's license on July 9, 2007.

**O. July 10, 2007: Physical Surveillance of MEIZHU WANG, TIANSHENG ZHANG, TIMOTHY JOHNSON and DONG DONG GUO at the Bridgeview Facility**

100. On July 10, 2007, law enforcement conducted surveillance at the Bridgeview Facility. At approximately 11:26 a.m., an Asian female ("CUSTOMER L") was observed exiting the Bridgeview Facility, at which time, CUSTOMER L began walking with MEIZHU WANG who was standing in the vicinity of the Bridgeview Facility. MEIZHU WANG and CUSTOMER L subsequently walked and approached a Nissan Altima, bearing Illinois license plate 8488518 ("Nissan Altima"),<sup>71</sup> which was parked in an adjacent strip mall. At this time, law enforcement lost visual contact of MEIZHU WANG and CUSTOMER L. Approximately three minutes later,

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<sup>70</sup> A review of ISOS vehicle registration records revealed license plate X129419 was registered to CO-CONSPIRATOR B with an address of 2309F South Stewart Avenue, Chicago, Illinois.

<sup>71</sup> A review of ISOS vehicle registration records revealed that license plate 8488518 was registered to INDIVIDUAL 9 with an address of 1922 South Young Parkway, Chicago, Illinois.

TIMOTHY JOHNSON, driving a Chrysler 300M bearing Illinois license plate 8579787 ("Chrysler 300M"),<sup>72</sup> was observed parking in the same strip mall adjacent to the Bridgeview Facility. At approximately 11:30 a.m., TIANSHENG ZHANG, who arrived in the Mazda 6, was observed entering the Chrysler 300M. Meanwhile, MEIZHU WANG and DONG DONG GUO were observed looking inside the Nissan Altima.

101. At approximately 11:32 a.m., the Chrysler 300M departed and was surveilled driving to Washington Mutual Bank located at 8729 Ridgeland, Oak Lawn, Illinois. While at Washington Mutual Bank, TIMOTHY JOHNSON entered the bank and upon returning to the Chrysler 300M, TIANSHENG ZHANG then entered the bank. Upon TIANSHENG ZHANG returning, TIMOTHY JOHNSON drove TIANSHENG ZHANG back to the Mazda 6. At approximately 12:09 p.m., TIANSHENG ZHANG entered the Mazda 6 along with an Asian female ("CUSTOMER M") and an Asian male ("CUSTOMER N"). Between approximately 12:09 p.m. and 1:35 p.m., surveillance was conducted on TIANSHENG ZHANG and CUSTOMER N. During this time period, CUSTOMER N was observed taking the ISOS Vehicle Road Test in the Mazda 6. Following CUSTOMER N completing the ISOS Vehicle Road Test, TIANSHENG ZHANG drove to a high-rise residential building located at 5020-5050 South Lake Shore Drive, Chicago, Illinois and was

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<sup>72</sup> TIMOTHY JOHNSON was identified based upon physical surveillance, a review of an ISOS driver's license photograph, ISOS vehicle registration records and information provided by ISOS/OIG. On or about May 3, 2007, TIMOTHY JOHNSON's employment with ISOS was terminated, however based upon a controlled purchase of fraudulent identification documents on July 18, 2007 (detailed below), law enforcement believes that TIMOTHY JOHNSON was continuing to assist brokers with fraudulently obtaining Illinois driver's licenses and identification cards by coordinating with other corrupt ISOS Public Service Representatives, to include JAMES HOWELL. A review of ISOS vehicle registration records revealed that license plate 8579787 was registered to TIMOTHY JOHNSON with an address of 8639 South 87th Avenue, Justice, Illinois.

followed by TIMOTHY JOHNSON, who drove the Chrysler 300M.<sup>73</sup> Thereafter, TIANSHENG ZHANG and TIMOTHY JOHNSON were observed entering the building. At approximately 3:58 p.m., TIMOTHY JOHNSON and TIANSHENG ZHANG exited the building and were observed driving in the Chrysler 300M to Washington Mutual Bank located at 1364 West 53rd Street, Chicago, Illinois. At Washington Mutual Bank, TIANSHENG ZHANG was observed entering and then exiting after approximately two minutes. Thereafter, TIMOTHY JOHNSON drove TIANSHENG ZHANG back to TIANSHENG ZHANG's residence. Continued surveillance of TIANSHENG ZHANG revealed that, later on July 10, 2007, TIANSHENG ZHANG transported CUSTOMER N to Chicago Midway Airport.

102. A review of ISOS records revealed that CUSTOMER M obtained a driver's licenses on July 10, 2007 and utilized a social security account number with the prefix "612." Further, the records revealed that CUSTOMER N obtained an identification card on July 9, 2007, a driver's license on July 10, 2007 and utilized a social security account number with the prefix "586."

**P. July 18, 2007: Undercover Officer Purchased Fraudulent Personal Identification Documents from JUN YUN ZHANG and DONG DONG GUO and Made Bribe Payment to JAMES HOWELL.**

103. On July 16, 2007, CS-1 met with law enforcement officers and participated in a consensually recorded telephone conversation with JUN YUN ZHANG. At approximately 1:47 p.m., CS-1 called **SUBJECT PHONE 1** and spoke to JUN YUN ZHANG. During this conversation, CS-1 advised JUN YUN ZHANG that CS-1 wanted to refer a customer, who needed a driver's license, to JUN YUN ZHANG. Further, CS-1 stated that, "He doesn't have any document"

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<sup>73</sup> Based upon a review of the tenant log and telephone records, it is believed that TIANSHENG ZHANG has resided, at times, in this building.

and JUN YUN ZHANG asked if the customer knew how to drive. CS-1 advised JUN YUN ZHANG that the customer did not know how to drive. JUN YUN ZHANG advised CS-1 that it would cost \$2,300 for the license and that, "It would take two or three days without taking a road test."

104. On July 16, 2007, at approximately 6:12 p.m., CS-1's friend, who was actually an Undercover Officer ("UCO-2"), conducted a consensually recorded telephone call to **SUBJECT PHONE 1** and spoke with JUN YUN ZHANG.<sup>74</sup> UCO-2 was able to identify the voice of the speaker as JUN YUN ZHANG based on UCO-2's prior review of recorded conversations between CS-1 and JUN YUN ZHANG. During this conversation, UCO-2 indicated that UCO-2 was a friend of CS-1 and further stated, "(CS-1) said you can do the driver's license for me." JUN YUN ZHANG replied, "Right." UCO-2 asked JUN YUN ZHANG how much it would cost and JUN YUN ZHANG stated, "Social security card. How old are you?" UCO-2 said UCO-2 was thirty-five years old, at which time, JUN YUN ZHANG asked if thirty years old would be satisfactory.<sup>75</sup> UCO-2 agreed that thirty years old would be acceptable. Since UCO-2 was a friend of CS-1, JUN YUN ZHANG attempted to encourage UCO-2 to take the vehicle road test due to the fact that there was a risk involved with not officially taking the test and that the license could be canceled later. JUN

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<sup>74</sup> UCO-2 speaks Mandarin Chinese and all conversations involving UCO-2, which are referenced in this Affidavit, were conducted in the Mandarin Chinese language. Moreover, the recordings compiled by UCO-2 on July 18, 2007, were obtained pursuant to a State of Illinois consensual over hear court order.

<sup>75</sup> Based upon the investigation to date, including information from CS-1 and recorded conversations, it is known that there are different pricing brackets based upon the age associated with a social security account card. For instance, social security account cards associated with persons in their forties or fifties are more difficult to obtain and therefore require the payment of a higher fee.

YUN ZHANG stated, "There is a way to help you and spend some money (make a bribe) but if it gets canceled and get pulled away by a police... You don't know." JUN YUN ZHANG indicated to UCO-2 that JUN YUN ZHANG had been doing the driver's license business for ten years and had seen people that had to retake the test. Based upon the content and context of the conversation, UCO-2 understood JUN YUN ZHANG to be referring to the fact that if the bribery scheme was ever identified, law enforcement officials would likely have all fraudulently issued driver's licenses revoked which could result in the arrest of UCO-2 at a later date. Later in the conversation, UCO-2 questioned, "\$2,300 includes not taking the road test, right," at which time, JUN YUN ZHANG replied, "Right." Additionally, JUN YUN ZHANG instructed UCO-2 to bring two photographs and they both agreed to meet on July 18, 2007.

105. On July 18, 2007, UCO-2 was equipped with an audio and video recording device in preparation for attempting to purchase fraudulent documents and a driver's license through the assistance of JUN YUN ZHANG. Additionally, UCO-2 was provided with \$2,500 in pre-recorded funds. At approximately 9:19 a.m., UCO-2 placed a telephone call to **SUBJECT PHONE 1** and spoke with JUN YUN ZHANG, who identified himself as "LAO SZE."<sup>76</sup> During this conversation, UCO-2 advised JUN YUN ZHANG that UCO-2 was currently at the Chinatown Marketplace, located at 2121 South Archer Avenue, Chicago, Illinois. JUN YUN ZHANG advised UCO-2 to wait at that location. At that time, law enforcement officers initiated surveillance in the vicinity of UCO-2. At approximately 9:39 a.m., UCO-2 placed a call to **SUBJECT PHONE 1** and spoke with JUN YUN ZHANG. During this conversation, JUN YUN ZHANG advised UCO-2 to wait a few more

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<sup>76</sup> Only UCO-2's portion of the telephone calls from July 18, 2007 were recorded using a recording device on UCO-2's body.

minutes and that JUN YUN ZHANG's son would meet with UCO-2.

106. At approximately 10:12 a.m., UCO-2 received an incoming call from an unknown Mandarin Chinese speaking male, who utilized **SUBJECT PHONE 1**, which UCO-2 knew because UCO-2 recognized the number for **SUBJECT PHONE 1** when it appeared on the caller identification function of UCO-2's cellular telephone. The unknown male instructed UCO-2 to look for a silver Toyota in the Chinatown Market parking lot. Subsequently, UCO-2 observed Toyota Solara, bearing Illinois license plate 9251439, in the lot and met with the driver, who UCO-2 later identified as DONG DONG GUO.<sup>77</sup> UCO-2 entered Toyota Solara, at which time, DONG DONG GUO requested two passport photographs from UCO-2. Thereafter, UCO-2 provided two passport photographs depicting UCO-2 to DONG DONG GUO. UCO-2 then exited the vehicle and DONG DONG GUO departed. At this time, law enforcement officers conducting surveillance observed DONG DONG GUO drive Toyota Solara to 2734 South Wentworth Avenue, Chicago, Illinois and park in the underground parking lot. At approximately 10:56 a.m., DONG DONG GUO was observed exiting the underground parking lot in Toyota Solara. Approximately five minutes later, UCO-2 received an incoming call from **SUBJECT PHONE 1**, at which time, DONG DONG GUO told UCO-2 to meet with DONG DONG GUO in the Chinatown Market parking lot. Subsequently, UCO-2 located Toyota Solara, driven by DONG DONG GUO, in the Chinatown Market parking lot and then entered the vehicle. At that time, DONG DONG GUO provided UCO-2 with a PRC passport, bearing UCO-2's photograph, and issued in the identity of IDENTITY B. Additionally,

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<sup>77</sup> This individual later identified himself to UCO-2 by the nickname, XIAO ZHANG. However, UCO-2 and other law enforcement officers have identified an Illinois driver's license photograph issued in the name of DONG DONG GUO as being the individual who met with UCO-2. CS-1 has identified the Illinois driver's license photograph of DONG DONG GUO as being JUN YUN ZHANG's son.

DONG DONG GUO provided UCO-2 with a social security account card, bearing a number with the prefix, "586,"<sup>78</sup> which was issued to IDENTITY B's name. Also, DONG DONG GUO provided UCO-2 a photocopy of an ISOS Driver's License Written Examination. DONG DONG GUO then provided detailed instructions to UCO-2 in regards to a memorization scheme that would allow UCO-2 to pass any version of the written examination administered by the ISOS.<sup>79</sup> While in the vehicle, DONG DONG GUO instructed UCO-2 to hold the test low due to the fact that an individual could be arrested for possessing the test. DONG DONG GUO also provided UCO-2 an empty white envelope, with a postal stamp and a postmark, which was addressed to IDENTITY B's name at an address in Chicago, Illinois. At approximately 11:07 a.m. law enforcement officers observed DONG DONG GUO's vehicle depart with UCO-2.

107. Several minutes later, DONG DONG GUO was observed parking in the vicinity of 2832 South Wentworth Avenue, Chicago, Illinois. At this location, an unidentified Asian male ("CUSTOMER O") entered DONG DONG GUO's vehicle, at which time, DONG DONG GUO provided CUSTOMER O with a PRC passport and a social security account card. DONG DONG GUO then advised UCO-2 to instruct CUSTOMER O in regards to the procedure to take the ISOS Driver's License Written Examination, at which time, UCO-2 agreed. Subsequently, DONG DONG

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<sup>78</sup> Based upon a later review of this social security account card by the SSA/OIG, it was determined that the associated number was valid. Pursuant to other document purchases conducted in this investigation, it is known that manufactures, such as JUN YUN ZHANG, alter the biographical page of the PRC passports to match the identity associated with a valid social security account card. Laboratory analysis of this social security card to determine authenticity is pending.

<sup>79</sup> As explained above, the scheme outlined by DONG DONG GUO is based upon memorizing a series of rules which will allow an individual to correctly answer multiple choice-style questions found on the ISOS Driver's License Written Examination.

GUO departed with UCO-2 and CUSTOMER O.

108. At approximately 11:24 a.m., DONG DONG GUO parked the Toyota Solara in the vicinity of 2909 South Elias Court, Chicago, Illinois. At that time, law enforcement officers observed JUN XI ZHANG exit 2909 South Elias Court while carrying a white envelope. Subsequently, JUN XI ZHANG handed a white envelope to DONG DONG GUO. UCO-2 observed that the envelope appeared blank, but contained a stamp and an apparent postmark. DONG DONG GUO then asked CUSTOMER O if CUSTOMER O wanted to use CUSTOMER O's address or a different address. CUSTOMER O indicated that DONG DONG GUO could use the address on CUSTOMER O's fake International Driver's license which CUSTOMER O subsequently provided to DONG DONG GUO. UCO-2 observed DONG DONG GUO write on the front of the envelope, to include writing the name which appeared on the PRC passport that had been provided to CUSTOMER O. CUSTOMER O advised DONG DONG GUO that CUSTOMER O would be taking the vehicle road test since CUSTOMER O had been driving for awhile. Consequently, DONG DONG GUO stated that CUSTOMER O would obtain an identification card on that day and that CUSTOMER O would be taken the following day to take the vehicle road test.

109. At approximately 11:36 a.m., DONG DONG GUO placed an outgoing call on a cellular telephone while in the presence of UCO-2. During this conversation, UCO-2 overheard DONG DONG GUO instructing the other caller to contact DONG DONG GUO's father (JUN YUN ZHANG) at (917) 605-7990 (hereinafter "**SUBJECT PHONE 2**").<sup>80</sup> Shortly thereafter, DONG DONG GUO had another conversation on a cellular telephone which was conducted in English.

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<sup>80</sup> Telephone number (917)605-7990 is subscribed to by QIONG ZHOU with an address of 6705 Wescott Road, Falls Church, Virginia.

A review of the recording revealed that DONG DONG stated in part, "Hello, ah there's one today. I'm going to go to 84 today for getting permit. Is there a lot of Chinese over there?"<sup>81</sup> Around this time, DONG DONG GUO requested \$1,500 from UCO-2, at which time, UCO-2 indicated that UCO-2 would provide only \$1,000 because UCO-2 had not obtained UCO-2's driver's license yet. DONG DONG GUO eventually agreed to accept only \$1,000, at which time, UCO-2 provided \$1,000 in pre-recorded funds to DONG DONG GUO. DONG DONG GUO and UCO-2 also discussed the social security card UCO-2 received. Based upon a review of the recording, DONG DONG GUO stated, "This (social security account card) is genuine" and also stated, "Those cards are good. Try to build up your credit with the card you are going to use. After three or four years, you can apply a credit card with it, when its maximum limit reached \$10,000, you can make purchase with all, then discard everything (abandon the debt)."

110. At approximately 12:10 p.m., DONG DONG GUO parked in the vicinity of the Bridgeview Facility. DONG DONG GUO then provided a vehicle insurance card to UCO-2 and provided instructions to UCO-2 relative to UCO-2 entering the Bridgeview Facility. Subsequently, UCO-2 exited DONG DONG GUO's vehicle and upon entering the Bridgeview Facility, UCO-2 followed the normal procedures to obtain a driver's license to include completing an application, presenting UCO-2's PRC passport, social security account card, postmarked envelope as well as making a payment for the respective fee. Further, UCO-2 received and completed the ISOS Driver's

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<sup>81</sup> In later conversations on July 18, 2007, DONG DONG GUO advised UCO-2 that DONG DONG GUO's telephone number was (917)815-4952. A review of telephone records for (917)815-4952, for the time period around DONG DONG GUO's English conversation indicated an outgoing call to (312)506-7965. As explained below, it is believed that TIMOTHY JOHNSON utilizes telephone number (312)506-7965. Affiant believes that DONG DONG GUO's reference to "84" was a reference to the ISOS Driver Service Facility located at 7200 West 84th Street, Bridgeview, Illinois ("Bridgeview Facility").

License Written Examination. Upon completing the written examination, an ISOS employee provided UCO-2 with two computer generated ISOS documents and one blank ISOS road test score sheet. Further, UCO-2 was instructed by the ISOS employee to drive UCO-2's vehicle to the west door. Approximately three minutes later, law enforcement officers conducting surveillance observed CUSTOMER O exit DONG DONG GUO's vehicle and enter the Bridgeview Facility.

111. Between 12:39 p.m. and 12:56 p.m., law enforcement officers conducting surveillance observed JAMES HOWELL<sup>82</sup> enter and depart in two separate vehicles which had been located in the Bridgeview Facility's vehicle road test line. Both of these vehicles were driven by unidentified Asian males.

112. At approximately 1:00 p.m., UCO-2 exited the Bridgeview Facility, called **SUBJECT PHONE 1** and spoke with DONG DONG GUO. DONG DONG GUO instructed UCO-2 to meet with DONG DONG GUO, at which time, UCO-2 entered DONG DONG GUO's vehicle which was parked in the vicinity. This meeting was observed by law enforcement officers conducting surveillance and was audio and video recorded by equipment being worn by UCO-2.

Subsequently, DONG DONG GUO drove to a McDonald's Restaurant located at 7701 South Harlem Avenue, Bridgeview, Illinois. At approximately 1:10 p.m., DONG DONG GUO placed an outgoing telephone call on a cellular telephone, at which time, DONG DONG GUO's portion of the

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<sup>82</sup> JAMES HOWELL was identified through physical surveillance, to include in-person observation of his ISOS name tag indicating the name, "James," a review of video footage obtained by UCO-2's recording device from July 18, 2007, a review of an Illinois driver's license photograph of JAMES HOWELL and through consultation with ISOS/OIG. Based on ISOS records, on July 18, 2007, JAMES HOWELL was employed by ISOS as a Public Service Representative and was responsible for conducting ISOS Vehicle Road Tests.

conversation was recorded by the recording device worn by UCO-2.<sup>83</sup> A review of the recorded conversation revealed that DONG DONG GUO stated in English, "Yeah, where are you at," and further stated, "I thought, I thought there was nobody in the car." Upon concluding the telephone call, DONG DONG GUO took the two ISOS documents and ISOS road test score sheet from UCO-2, exited the vehicle and briefly entered a Chrysler 300M, which was driven by TIMOTHY JOHNSON.<sup>84</sup> As previously mentioned, during conversations on July 18, 2007, DONG DONG GUO advised UCO-2 that DONG DONG GUO's telephone number was (917) 815-4952. A review of subpoenaed telephone records relative to (917)815-4952, revealed that at approximately 1:09 p.m., an outgoing call was made to (312)506-7965. Based upon DONG DONG GUO's statements made in English during the telephone call observed by UCO-2 and DONG DONG GUO's action of entering TIMOTHY JOHNSON's vehicle, it is believed that TIMOTHY JOHNSON utilizes telephone number (312)506-7965.

113. DONG DONG GUO then returned to DONG DONG GUO's vehicle and provided the two ISOS documents back to UCO-2. UCO-2 then provided the PRC passport back to DONG DONG GUO and the empty white envelope that was previously provided to UCO-2 by DONG

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<sup>83</sup> At this same time, CUSTOMER O was observed by law enforcement exiting the Bridgeview Facility, at which time, visual contact of CUSTOMER O was lost. At approximately 3:56 p.m., CUSTOMER O was observed entering DONG DONG GUO's vehicle in the vicinity of 8611 South Harlem Avenue.

<sup>84</sup> TIMOTHY JOHNSON was identified based upon investigation, to include a review of ISOS vehicle registration records and an Illinois driver's license photograph of TIMOTHY JOHNSON, physical surveillance and consultation with ISOS/OIG. The Chrysler 300M was registered to and known to be utilized by TIMOTHY JOHNSON. Further, ISOS/OIG has advised that TIMOTHY JOHNSON was a former ISOS Public Service Representative who had been responsible for conducting vehicle road tests. TIMOTHY JOHNSON's employment with ISOS was terminated on or about May 3, 2007.

DONG GUO. Around this same time, law enforcement officers conducting surveillance in the area observed the Chrysler 300M driven by TIMOTHY JOHNSON depart the area. While waiting in the vehicle, UCO-2 and DONG DONG GUO discussed the problem of how some customers received their driver's licenses, then fled without making a payment to DONG DONG GUO. Consequently, DONG DONG GUO indicated that was why DONG DONG GUO required a payment prior to the customer receiving his/her driver's license. Also during this conversation, DONG DONG GUO discussed UCO-2's documents and stated, "I spent 1700 to 1800 each, including road test. The inside people get three, four hundred." Based upon the investigation and the context of the conversation, UCO-2 understood DONG DONG GUO's statement to mean that DONG DONG GUO spent \$1,700 to \$1,800 to obtain UCO-2's altered passport, social security account card and to pay the bribe to an ISOS Public Service Representative.

114. At approximately 1:45 p.m., surveillance observed the Chrysler 300M driven by TIMOTHY JOHNSON enter the Bridgeview Court Shopping Center parking lot, located at approximately 7700 S. Harlem in Bridgeview, Illinois. At approximately 1:48 p.m., surveillance observed DONG DONG GUO's vehicle following the Chrysler 300M, with TIMOTHY JOHNSON inside, at which time both vehicles parked in the Bridgeview Court Shopping Center parking lot. Subsequently, DONG DONG GUO exited his vehicle and briefly entered the Chrysler 300M. DONG DONG GUO then returned to DONG DONG GUO's vehicle carrying a magazine. UCO-2 observed that inside the magazine was UCO-2's ISOS road test score sheet which now contained pen marks and writing. DONG DONG GUO took UCO-2's two other ISOS documents and placed them in the magazine as well. DONG DONG GUO then provided the magazine to UCO-2 and instructed UCO-2 to go to the restroom upon returning to the Bridgeview Facility. DONG DONG GUO

advised UCO-2 that a black person knew the documents were inside the magazine and further instructed UCO-2 to give the black person \$100. DONG DONG GUO then instructed UCO-2 to go to the photograph line upon exiting the restroom. DONG DONG GUO was then surveilled driving to the Bridgeview Facility. At the Bridgeview Facility, DONG DONG GUO and UCO-2 waited inside DONG DONG GUO's vehicle.

115. At approximately 2:23 p.m., an Asian male ("CUSTOMER P") was observed exiting the Bridgeview Facility, while carrying paperwork. Thereafter, CUSTOMER P approached JUN SHUN ZHANG<sup>85</sup> who was seated in a Toyota Camry, bearing Illinois license plate G334159 ("Toyota Camry[4]"),<sup>86</sup> which was parked in the Bridgeview Facility parking lot. After talking with JUN SHUN ZHANG for several minutes, CUSTOMER P re-entered the facility.

116. At approximately 2:45 p.m., WENYUAN ZHOU approached DONG DONG GUO's vehicle and subsequently entered the vehicle and engaged in conversation with DONG DONG GUO, portions of which were recorded by the recording device worn by UCO-2. Based upon a review of the recorded conversation, DONG DONG GUO asked why WENYUAN ZHOU was wearing "such clothes" and WENYUAN ZHOU stated, "I am wearing this clothes because my client took his picture (passport photograph) this morning. I exchanged clothes with him." Based upon the content and context of the conversation, UCO-2 understood that WENYUAN ZHOU was advising that WENYUAN ZHOU's customer had obtained a passport photograph earlier in the day and, therefore,

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<sup>85</sup> JUN SHUN ZHANG was identified based upon physical surveillance, a review of an Illinois driver's license photograph and ISOS vehicle registration records.

<sup>86</sup> A review of ISOS vehicle registration records revealed that license plate G334159 was registered to Jun S. ZHANG (JUN SHUN ZHANG) with an address of 7403 West Irving Park Road, Chicago, Illinois.

WENYUAN ZHOU did not want the customer wearing the same clothes as in the passport due to a fear that ISOS personnel might question the validity of the passport. Additionally, WENYUAN ZHOU stated, "I bought eight. No, didn't buy eight, it can't be eight, there were three who took the test (ISOS Vehicle Road Test) by themselves (without making a bribe payment). Bought four on Friday, on Friday those four, motherfucker, I was so nervous. My friend's father, my friend's aunt knows the father of my friends, she knows my friend's father's friend, four of them came over and didn't make any money." Based upon the content and context of the conversation, UCO-2 understood that WENYUAN ZHOU had recently assisted several individuals with obtaining driver's licenses or identification cards, but since they were all friends, WENYUAN ZHOU did not make any profit from assisting those customers.

117. Moreover, Affiant believes that WENYUAN ZHOU was also coordinating with corrupt ISOS Public Service Representatives in furtherance of obtaining driver's licenses for WENYUAN ZHOU's customers without the customers having to take the ISOS Vehicle Road Test ("bought four on Friday"). As previously mentioned, it is believed that TIMOTHY JOHNSON has utilized telephone number (312)506-7965. A review of telephone records revealed that on Wednesday, July 18, 2007, there were approximately seven telephone calls between (312)506-7965 and (312)493-6132. As detailed later in this Affidavit, based upon subscriber information and consensually recorded telephone calls between UCO-2 and WENYUAN ZHOU, law enforcement has identified WENYUAN ZHOU as utilizing telephone number (312)493-6132. A review of telephone records for the previous "Friday," (July 13, 2007) revealed approximately thirteen contacts between telephone numbers (312)506-7965 and (312)493-6132.

118. Also during the conversation, DONG DONG GUO asked where WENYUAN

ZHOU's vehicle was located and WENYUAN ZHOU replied that WENYUAN ZHOU's vehicle was, "In testing", a reference to being utilized by a customer for the vehicle road test. Based upon a review of surveillance video and photographs obtained during the course of this surveillance, it was later determined that WENYUAN ZHOU had conversation with an Asian male, ("CUSTOMER Q"), in the vicinity of the Bridgeview Facility. A review of ISOS records revealed that CUSTOMER Q obtained a driver's license on July 18, 2008, utilized a social security account number with the prefix "586" and utilized WENYUAN ZHOU's Chevrolet Venture to perform the ISOS Vehicle Road Test.

119. At approximately 2:50 p.m., WENYUAN ZHOU received an incoming call on WENYUAN ZHOU's mobile telephone. Upon answering the telephone, WENYUAN ZHOU eventually passed the telephone to DONG DONG GUO and commented that WENYUAN ZHOU did not work with Fuzhou people. DONG DONG GUO spoke a few minutes with the unknown caller and then terminated the telephone call and gave the telephone back to WENYUAN ZHOU. Based upon the comment made by WENZYUAN ZHOU, UCO-2 believed that the incoming caller was a Fuzhou Chinese speaking customer and given that WENYUAN ZHOU cannot speak Fuzhou Chinese, WENYUAN ZHOU referred the customer to DONG DONG GUO. Shortly thereafter, WENYUAN ZHOU exited DONG DONG GUO's vehicle.

120. At approximately 3:28 p.m., law enforcement officers observed JAMES HOWELL enter Toyota Camry[5] which was located in the vehicle road test lane at the Bridgeview Facility. Toyota Camry[5] departed and was driven by an unidentified Asian male. At approximately 3:34 p.m., Toyota Camry[5] returned to the Bridgeview Facility, at which time, JAMES HOWELL exited. Several minutes later, JAMES HOWELL was observed entering the Chevrolet Venture which was parked in the vehicle road test lane at the Bridgeview Facility.

121. At approximately 3:42 p.m., law enforcement officers observed TIMOTHY JOHNSON briefly enter the Bridgeview Facility then exit the facility. Approximately five minutes later, the Chevrolet Venture returned to the Bridgeview Facility, at which time, JAMES HOWELL exited and was observed having a brief conversation with TIMOTHY JOHNSON. Shortly thereafter, TIMOTHY JOHNSON was observed walking toward the east doors of the Bridgeview Facility.

122. At approximately 3:56 p.m., UCO-2 entered the Bridgeview Facility and waited in the men's restroom. Approximately six minutes later, TIMOTHY JOHNSON entered the restroom while talking on a cellular telephone. A review of the recording from UCO-2 revealed that TIMOTHY JOHNSON stated over the telephone to an unknown individual, in part, "Only one customer" and later stated, "I think he might have put the stuff in the glove box 'cause he said he had three (customers)."<sup>87</sup> TIMOTHY JOHNSON then exited the restroom. Several minutes later, JAMES HOWELL entered the bathroom and took the magazine and \$100 in pre-recorded funds from UCO-2. Subsequently, UCO-2 exited the restroom and entered the photograph line where UCO-2 was photographed for a driver's license. At approximately 4:05 p.m., an ISOS employee called out the alias name being utilized by UCO-2, at which time, UCO-2 approached the employee and was provided with an Illinois driver's license. UCO-2 exited the Bridgeview Facility and entered DONG DONG GUO's vehicle which was parked in the vicinity.

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<sup>87</sup> Based upon the investigation and information from CS-2, it is known that a common method of bribing or attempting to bribe an ISOS Public Service Representative, who is responsible for conducting vehicle road tests, is to place cash in the glove box or side door compartments for the ISOS Public Service Representative to retrieve during the actual vehicle road test. Based upon surveillance, law enforcement officers were aware that other identified Chinese brokers and couriers were present on July 18, 2008, at the Bridgeview Facility, including JUN SHUN ZHANG, TIANSHENG ZHANG, and GUOQI ZHANG.

123. At approximately 4:11 p.m., JAMES HOWELL was observed exiting the Bridgeview Facility and walking to a gasoline station located at 8301 South Harlem Avenue. At the gasoline station, JAMES HOWELL was observed having a conversation with TIMOTHY JOHNSON who was seated inside his Chrysler 300M. Several minutes later, TIANSHENG ZHANG was observed parking the Mazda 6 in the vicinity of JAMES HOWELL and TIMOTHY JOHNSON. TIANSHENG ZHANG was then observed briefly entering the Chrysler 300M and then returning to the Mazda 6. Subsequently, JAMES HOWELL entered TIMOTHY JOHNSON's vehicle. At this time, a Toyota Corolla occupied by two unidentified Asian males was observed parking in the vicinity of TIMOTHY JOHNSON and JAMES HOWELL. One of the Asian males was observed talking with JAMES HOWELL.

124. At approximately 4:28 p.m., while still talking with DONG DONG GUO in the parking lot of the Bridgeview facility, UCO-2 provided an additional \$1,200 in pre-recorded funds to DONG DONG GUO, which was the remainder of the money UCO-2 owed to DONG DONG GUO based on the agreed price. Subsequently, DONG DONG GUO transported UCO-2 to the Chinatown Market, at which time, UCO-2 exited DONG DONG GUO's vehicle.

125. Based on a review of ISOS records, the driver's license application for UCO-2 listed that UCO-2 had performed the ISOS Vehicle Road Test in a 2007 Toyota bearing license plate D440032 and that ISOS Public Service Representative ("PSR-C") administered the ISOS Vehicle Road Test. Based on the information set forth in above, Affiant believes that this information is false because UCO-2 never took the road test.

126. A review of ISOS records revealed that CUSTOMER O, who had been assisted by DONG DONG GUO, obtained an identification card on July 18, 2007, and utilized a social security

account card with the prefix "586."

127. A review of ISOS records revealed that CUSTOMER P, who had been assisted by JUN SHUN ZHANG, obtained an identification card on June 14, 2007, utilizing a social security number with the prefix "107", and obtained a driver's license on July 18, 2007. A review of the associated driver's license application revealed that CUSTOMER P utilized the Toyota Camry[4] for the ISOS Vehicle Road Test which was administered by JAMES HOWELL.

128. A later review of surveillance video and photographs from July 18, 2007, revealed at approximately 2:50 p.m., RONG SI was present at a strip mall located adjacent to the Bridgeview Facility. A review of ISOS records revealed that on July 18, 2007, an Asian male, ("CUSTOMER R"), obtained an identification card utilizing a social security account number with the prefix "586." Further, ISOS records reflect that CUSTOMER R performed, but failed, the ISOS Vehicle Road Test on July 18, 2007, in the Dodge Caravan previously identified as being utilized by RONG SI.

129. A later review of surveillance video and photographs from July 18, 2007, revealed that at approximately 3:58 p.m., GUOQI ZHANG, driving a Toyota vehicle bearing Illinois license plate X655053,<sup>88</sup> was observed entering the Bridgeview Facility parking lot. A review of ISOS records revealed that on July 18, 2007, an Asian male ("CUSTOMER S") obtained an identification card and a driver's license utilizing a social security account card with the prefix "586" and utilized the Toyota bearing license plate X655053 to perform the ISOS Vehicle Road Test.

130. A later review of surveillance video and photographs from July 18, 2007, revealed that during a period of time, JAMES HOWELL was a passenger in a Honda Civic, bearing Illinois

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<sup>88</sup> A review of ISOS vehicle registration records revealed that license plate X655053 was registered to GUOQI ZHANG and INDIVIDUAL 10 with an address of 8105 Magnolia, Frankfort, Illinois.

license plate 1637422. This Honda Civic was driven by an Asian male ("CUSTOMER T"). A review of ISOS records revealed that CUSTOMER T obtained a driver's license on July 18, 2007. A review of the CUSTOMER T driver's license application revealed that JAMES HOWELL was listed as administering the ISOS Vehicle Road Test, but the application listed that the CUSTOMER T utilized a 2000 Toyota, bearing Illinois license plate 9177127. Affiant believes that the vehicle information was fabricated in an effort to deter detection of this fraudulent document and bribery scheme.

**Q. July 19, 2007: JUN SHUN ZHANG Arrested for Attempting to Bribe an ISOS Public Service Representative**

131. On July 19, 2007, JUN SHUN ZHANG was arrested by the Illinois Secretary of State Police/Cook County Sheriff's Office for Offering a Commercial Bribe. Based upon a review of the arrest report, JUN SHUN ZHANG attempted to bribe an ISOS Public Service Representative ("PSR-D") who was working at a Driver Services Facility. Specifically, JUN SHUN ZHANG offered a \$100 bribe to PSR-D in order for PSR-D to pass an Asian male ("CUSTOMER U") who had failed the ISOS Vehicle Road Test. A review of ISOS records revealed that CUSTOMER U obtained an identification card on July 17, 2007, and utilized a social security account number with the prefix "586." In relation to this arrest, JUN SHUN ZHANG was found guilty and sentenced on February 15, 2008 to 24 months probation.

132. On November 28, 2007, an ISOS Public Service Representative ("PSR-E") was interviewed by law enforcement officers, based upon information provided by ISOS/OIG which indicated that PSR-E had also been offered bribes while working in an official capacity at a Driver Services Facility. During the course of this interview, PSR-E advised that in late September 2007, PSR-E was approached by an Asian male, who PSR-E identified in photo lineup as JUN SHUN

ZHANG,<sup>89</sup> outside a Driver Services Facility. At that time, JUN SHUN ZHANG asked if PSR-E was interested in making some money and advised that PSR-E could receive \$150 to \$200 for every person that PSR-E passed on the ISOS Vehicle Road Test. JUN SHUN ZHANG further advised PSR-E that "James," a black male used to pass JUN SHUN ZHANG's people during the vehicle road test portion of the process, but got greedy and was subsequently fired.<sup>90</sup> During this conversation, PSR-E did not show any interest in JUN SHUN ZHANG's solicitation. Upon ending this conversation, PSR-E reported this incident to PSR-E's supervisor.

133. Also during the interview, PSR-E advised that on either November 22 or 23, 2007, PSR-E was again approached outside a Driver Services Facility by JUN SHUN ZHANG. At that time, JUN SHUN ZHANG asked if PSR-E was certified to administer vehicle road tests, at which time, PSR-E replied affirmatively. JUN SHUN ZHANG then stated that JUN SHUN ZHANG would be in contact with PSR-E. Upon ending this conversation, PSR-E reported this incident to PSR-E's supervisor.

134. Further, PSR-E advised that on November 26, 2007, PSR-E was again approached by JUN SHUN ZHANG outside a Driver Services Facility. At that time, JUN SHUN ZHANG provided a piece of paper to PSR-E, which was subsequently provided to law enforcement officers by PSR-E, which listed the name "Mikey" and the telephone number (312)823-5035. JUN SHUN

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<sup>89</sup> At the conclusion of this interview, PSR-E was shown a series of seven unlabeled photographs, at which time, PSR-E identified JUN SHUN ZHANG as being the Asian male who approached PSR-E.

<sup>90</sup> Based upon the investigation to date, Affiant believes that JUN SHUN ZHANG was referring to JAMES HOWELL, an African-American male. On or about August 6, 2007, JAMES HOWELL was placed on a leave of absence without pay pending the completion of an internal ISOS investigation for misconduct. On or about November 8, 2007, JAMES HOWELL resigned while still on a leave of absence without pay.

ZHANG advised that JUN SHUN ZHANG and PSR-E should meet in Chinatown so that no money would be exchanged between them at a Driver Services Facility should JUN SHUN ZHANG and PSR-E decide to work together. As before, PSR-E did not show any interest in JUN SHUN ZHANG's offer to work together. After ending the conversation with JUN SHUN ZHANG, PSR-E observed JUN SHUN ZHANG enter a Nissan Sentra bearing Illinois license plate X560768 ("Nissan Sentra").<sup>91</sup> PSR-E then reported this contact with JUN SHUN ZHANG to PSR-E's supervisor.

**R. July 26 - 31, 2007: Consensually Recorded Conversations Between UCO-2 and WENYUAN ZHOU Regarding UCO-2 obtaining an Illinois Driver's License**

135. In relation to a separate investigation, UCO-2, while acting in an undercover capacity, learned that "Ah Zhou" could assist people with obtaining a driver's licenses. Further, UCO-2 was advised that "Ah Zhou" utilized telephone number (312)493-6132.<sup>92</sup> On July 26, 2007, at approximately 8:13 p.m., UCO-2 called telephone number (312)493-6132 and conducted a consensually recorded telephone call with WENYUAN ZHOU, who identified himself as "Ah Zhou."<sup>93</sup> During this conversation, UCO-2 advised that UCO-2 was referred to WENYUAN ZHOU

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<sup>91</sup> A query of ISOS vehicle registration records revealed X560768 is registered to Jun S. Zhang (JUN SHUN ZHANG) at 7403 West Irving Park Road, Chicago, Illinois. Further, a review of approximately 1676 ISOS driver's license and identification card applications from approximately 2006 to 2008 revealed that license plate X560768 was listed on at least six ISOS driver's license applications as the vehicle utilized during the road test. Four of these driver's license applicants utilized social security account numbers beginning with the prefix "586" and one applicant utilized the residential address 2734 South Wentworth Avenue, Chicago, Illinois, which is the building where JUN YUN ZHANG and JUN SHUN ZHANG have resided.

<sup>92</sup> Investigation revealed that telephone number (312)493-6132 was subscribed to by Guian Zhao with an address of 509 West 28th Street, Chicago, Illinois. As previously mentioned, WENYUAN ZHOU has obtained an Illinois driver's license and identification card in the identity of Guian Zhao.

<sup>93</sup> UCO-2 has confirmed that the voice of the recipient of this telephone call is consistent with WENYUAN ZHOU's voice as captured by UCO-2's recording device on July 18, 2007, during the meeting between WENYUAN ZHOU and DONG DONG GUO. Additionally, for all

by INDIVIDUAL 11 and WENYUAN ZHOU acknowledged that INDIVIDUAL 11 had talked to WENYUAN ZHOU regarding getting a driver's license for UCO-2. UCO-2 asked, "You have to take the road test?", at which time, WENYUAN ZHOU replied, "Oh, you don't have to take the road test. I forgot INDIVIDUAL 11 did tell me no road test." WENYUAN ZHOU stated, "Get the ID, written test and the permit first" and further confirmed to UCO-2 that the social security account card was real. UCO-2 asked how many photographs WENYUAN ZHOU needed and WENYUAN ZHOU replied, "Two pieces."

136. On July 26, 2007, at approximately 9:16 p.m., UCO-2 conducted a consensually recorded telephone call with WENYUAN ZHOU. During this telephone conversation, UCO-2 discussed the price for UCO-2 to obtain a social security card and driver's license and stated, "Right, he (INDIVIDUAL 11) said its \$2,500" and WENYUAN ZHOU replied, "Right." Further, WENYUAN ZHOU stated, "I have to collect the money when you get the ID and social security card." Also during this conversation, UCO-2 stated, "INDIVIDUAL 11 mentioned we'll be going where, to the 95th Street (Chicago South Facility)?" and WENYUAN ZHOU replied, "Won't be going there" and "I will arrange everything. This is none of your business."

137. On July 30, 2007, at approximately 6:04 p.m., UCO-2 conducted a consensually recorded telephone conversation with WENYUAN ZHOU. During this conversation, UCO-2 inquired about when WENYUAN ZHOU could assist UCO-2 with obtaining a driver's license. WENYUAN ZHOU advised that WENYUAN ZHOU was currently out of state and that UCO-2 should call WENYUAN ZHOU the next day. Further, WENYUAN ZHOU stated, "It's because

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referenced telephone calls between UCO-2 and WENYUAN ZHOU, WENYUAN ZHOU utilized telephone number (312)493-6132.

today, this couple of days, today, tomorrow and the day after tomorrow, I have arranged everything. I have about five people and have arranged everything already" (believed to be a reference to five customers who WENYUAN ZHOU would be assisting with obtaining fraudulent personal identification documents and Illinois driver's licenses or identification cards.)

138. On July 31, 2007, at approximately 8:34 p.m., UCO-2 conducted a consensually recorded telephone call with WENYUAN ZHOU. During this telephone call, WENYUAN ZHOU indicated that WENYUAN ZHOU was in Atlanta and that UCO-2 should call on the upcoming Sunday. Further, WENYUAN ZHOU stated, "I can take you (obtain driver's license), but these few days I was away, my people wasn't careful and mess up things, so I don't want them to do it. So you have to wait for me to come back." Subsequent to this telephone call, further attempts by law enforcement to telephonically contact WENYUAN ZHOU were unsuccessful due to the termination of service to the telephone being utilized by WENYUAN ZHOU and due to the fact that WENYUAN ZHOU was arrested on August 1, 2007, relative to a separate investigation.

**S. August 8, 2007: Consensually Recorded telephone call Between UCO-2 and DONG DONG GUO Regarding Obtaining an Illinois Driver's License for UCO-2's Friend**

139. On August 8, 2007, at approximately 9:48 p.m., UCO-2 called telephone number (917)815-4952 and conducted a consensually recorded telephone conversation with DONG DONG GUO. During this conversation, UCO-2 stated, "Hey, my friend, the Cantonese friend, do you have the no road test right now (a reference to UCO-2's friend being able to obtain a driver's license without taking the ISOS Vehicle Road Test)." DONG DONG GUO replied, "Ah, the no road test is available" and that UCO-2 could bring UCO-2's friend anytime. Further, UCO-2 stated that UCO-2's friend needed a "social security card" and DONG DONG GUO replied, "Okay. Then there won't

be any problem." Further, UCO-2 and DONG DONG GUO agreed that UCO-2's friend would pay \$2,500 and DONG DONG GUO would receive \$2,300 and UCO-2 would receive \$200.<sup>94</sup>

**T. September 2007: Physical Surveillance of GUOQI ZHANG**

140. On September 4, 2007, law enforcement officers conducted surveillance of GUOQI ZHANG. At approximately 7:57 a.m., GUOQI ZHANG departed in Toyota Camry[1] from 8105 West Magnolia Drive, Frankfort, Illinois, which is a residence known to be utilized by GUOQI ZHANG based upon prior surveillance.<sup>95</sup> Approximately twelve minutes later, GUOQI ZHANG arrived at 8007 Hillcrest Lane, Tinley Park, Illinois, which based on surveillance is known to be a residence utilized by CO-CONSPIRATOR A and LI WEN HUANG. Law enforcement officers observed a Chevrolet van, bearing Illinois license plate 9553261 ("Chevrolet Van"),<sup>96</sup> which is

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<sup>94</sup> Law enforcement did not pursue having UCO-2's friend, another undercover officer, obtain a driver's license through DONG DONG GUO.

<sup>95</sup> A review of toll records for (708)653-8197, known to be utilized by GUOQI ZHANG, revealed that on September 4, 2007, at approximately 8:03 a.m., GUOQI ZHANG contacted telephone number (312)363-7162. As previously mentioned, based upon a wire interception on September 8, 2008, involving JUN YUN ZHANG, it is believed that the user of telephone number (312)363-7162 is involved in brokering fraudulent documents.

Additionally, between approximately 8:19 a.m. and 4:39 p.m., on September 4, 2007, there were approximately twelve contacts between (708)653-8197 and (317)603-3485 which is subscribed to by INDIVIDUAL 12, 1317 West 31st Place, Unit 1F, Chicago, Illinois. This address is known to be utilized by CO-CONSPIRATOR A based upon physical surveillance and trash searches.

<sup>96</sup> A review of ISOS vehicle registration records revealed that license plate 9553261 was registered to Shi L. Chun at 938 West 32nd Place, Chicago, Illinois. Through photographic comparisons, law enforcement is aware that LI WEN HUANG has obtained an Illinois driver's license under the alias of SHI CHUN LI. Additionally, as explained below, through a review of ISOS records and photographs, law enforcement has determined that in addition to the driver's license obtained in the alias identity of SHI CHUN LI, LI WEN HUANG has obtained approximately five other driver's licenses or identification cards in alias identities. In relation to at least one of these driver's licenses, LI WEN HUANG utilized a social security account number with the prefix, "586."

known to be utilized by LI WEN HUANG parked at the residence. Thereafter, GUOQI ZHANG entered 8007 Hillcrest Lane for approximately two minutes then departed in Toyota Camry[1]. At approximately 9:58 a.m., an Asian male ("CUSTOMER V") entered GUOQI ZHANG's vehicle in the vicinity of 238 West Cermak Road, Chicago, Illinois, at which time, GUOQI ZHANG departed. At approximately 10:25 a.m., GUOQI ZHANG parked at 7201 West 84th Street, Bridgeview, Illinois, at which time, CUSTOMER V exited GUOQI ZHANG's vehicle, walked through a parking lot and entered the Bridgeview Facility. At approximately 11:36 a.m., CUSTOMER V exited the Bridgeview Facility and was observed carrying an identification card. Between 11:36 a.m. and 12:48 p.m., CUSTOMER V and GUOQI ZHANG were observed independently entering and exiting the Bridgeview Facility. At approximately 12:48 p.m., CUSTOMER V entered Toyota Camry[1], driven by GUOQI ZHANG, which was located in the vicinity of the Bridgeview Facility. GUOQI ZHANG subsequently departed and at approximately 1:22 p.m., GUOQI ZHANG dropped-off CUSTOMER V in Chicago's Chinatown community.

141. On September 11, 2007, law enforcement officers conducted a surveillance of GUOQI ZHANG which was initiated at 8105 West Magnolia Drive, Frankfort, Illinois. During this surveillance, GUOQI ZHANG was observed transporting an Asian male ("CUSTOMER W") and an Asian female ("CUSTOMER X") from the Comfort Suites Hotel located at 18400 Spring Creek Drive, Tinley Park, Illinois to the ISOS Driver Services Facility located at 14434 South Pulaski Road, Midlothian, Illinois ("Midlothian Facility"). At the Midlothian Facility, both CUSTOMER W and CUSTOMER X were observed entering and exiting the Midlothian Facility at various times. Based upon physical descriptions obtained of CUSTOMER W and CUSTOMER X during that surveillance and a later review of ISOS records, it was determined that CUSTOMER W and

CUSTOMER X were both issued Illinois identification cards which were obtained using social security account numbers with the prefix "586."

**U. January 16, 2008: Physical Surveillance of CO-CONSPIRATOR A, LI WEN HUANG and GUOQI ZHANG.**

142. On January 16, 2008, law enforcement conducted a surveillance of 2902 South Emerald Avenue, Chicago, Illinois. At approximately 1:45 p.m., CO-CONSPIRATOR A was observed exiting 2902 South Emerald Avenue and departing in a Toyota Camry, bearing Illinois license plate, 7543266 ("Toyota Camry[6]").<sup>97</sup> Several minutes later, CO-CONSPIRATOR A parked in the vicinity of 3000 South Halsted Avenue, Chicago, Illinois and an Asian male entered Toyota Camry [6]. Shortly thereafter, the Asian male exited CO-CONSPIRATOR A's vehicle and entered a BMW bearing New York license plate ECC7369.<sup>98</sup>

143. At approximately 2:17 p.m., CO-CONSPIRATOR A, LI WEN HUANG<sup>99</sup> and two other Asian males were observed exiting the Triple Crown Restaurant located at 3020 South Halsted Avenue and walking toward Toyota Camry [6]. Thereafter, CO-CONSPIRATOR A and LI WEN

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<sup>97</sup> A query of ISOS vehicle registration records revealed that license plate 7543266 was registered to CO-CONSPIRATOR A and INDIVIDUAL 13 with an address of 1317 West 31st Place.

<sup>98</sup> A review of approximately 1676 ISOS driver's license and identification card applications from approximately 2006 to 2008 obtained during the course of this investigation revealed that New York license plate ECC7369 was listed as the vehicle utilized during the ISOS Vehicle Road Test on three occasions by applicants who also utilized social security account numbers beginning with the prefix "586." Further, one of these applications listed that the applicant utilized passport number 144587906. As set forth later in this Affidavit, a PRC passport, bearing passport number 144587906, was covertly purchased from GUOQI ZHANG on January 31, 2008.

<sup>99</sup> Law enforcement identified LI WEN HUANG based upon physical surveillance, a review of ISOS driver's license photographs, CPD arrest records, information provided by CS-1 as well as a review of ICE records.

HUANG were observed moving items around the backseat of Toyota Camry [6]. At approximately 2:20 p.m., GUOQI ZHANG, driving a Toyota Camry bearing Illinois license plate, 7801032 ("Toyota Camry[7]"),<sup>100</sup> parked in the vicinity of CO-CONSPIRATOR A and LI WEN HUANG. Subsequently, LI WEN HUANG approached GUOQI ZHANG and handed an unknown object to GUOQI ZHANG.

**V. January 31, 2008: CS-2 Purchased PRC Passport and Social Security Account Card From GUOQI ZHANG.**

144. On January 29, 2008, CS-2 met with law enforcement officers and participated in a consensually recorded telephone call with GUOQI ZHANG. At approximately 2:06 p.m., CS-2 called GUOQI ZHANG and advised GUOQI ZHANG that, "He/She wants to have a passport and a social security number done."<sup>101</sup> GUOQI ZHANG replied, "Fine, you don't have to say, I understand. I (UI). Will do." After inquiring about how much it would cost, GUOQI ZHANG advised CS-2, "Two fives, two point five", which CS-2 understood to mean \$2,500. Also during this conversation CS-2 stated, "They (CS-2's customers) don't drive and they said they want someone to take the test for them. GUOQI ZHANG replied, "To take the test for someone, we charge \$300 here you know."

145. On January 31, 2008, CS-2 met with law enforcement officers and participated in a consensually recorded telephone conversation with GUOQI ZHANG. At approximately 9:50 a.m., CS-2 called GUOQI ZHANG and arranged to meet with GUOQI ZHANG later that same day.

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<sup>100</sup> A review of ISOS vehicle registration records revealed that Illinois license plate Toyota Camry [7] is registered to INDIVIDUAL 1 with an address of 8105 West Magnolia, Frankfort, Illinois, which is a residence known to be utilized by GUOQI ZHANG.

<sup>101</sup> Throughout this Affidavit, references to he/she or him/her are made due to the fact that the particular Chinese word utilized is ambiguous with respect to gender.

146. At approximately 9:55 a.m., law enforcement officers physically searched CS-2 and CS-2's vehicle for the presence of Contraband. CS-2 was only found to be in possession of a sum of money which CS-2 was allowed to retain, but the search was negative in all other respects. Shortly thereafter, CS-2 was equipped with an audio/video recording device, a transmitter and provided with a passport photograph of UCO-3 which was placed inside a large yellow envelope.

147. At approximately 10:06 a.m., CS-2 departed in CS-2's vehicle as followed by law enforcement officers and was observed parking at the Richwell Market located at 1835 South Canal Street, Chicago, Illinois ("Richwell Market"). At approximately 10:27 a.m., GUOQI ZHANG, driving Toyota Camry[1], parked in the vicinity of CS-2's vehicle. Thereafter, GUOQI ZHANG briefly entered CS-2's vehicle and then exited and departed in Toyota Camry[1]. Thereafter, CS-2 departed and was surveilled to a pre-determined location, where, CS-2 and CS-2's vehicle were searched for the presence of Contraband. CS-2 was found to be in possession of the same sum of personal cash identified previously and was found to be no longer in possession of the passport photograph of UCO-3, the searches were negative in all other respects. Additionally, the audio/video recording device and the transmitter were recovered. CS-2 advised law enforcement officers that upon GUOQI ZHANG arriving at Richwell Market, GUOQI ZHANG entered CS-2's vehicle, at which time, CS-2 provided the large yellow envelope to GUOQI ZHANG. A review of the recorded conversation revealed that GUOQI ZHANG asked if the photograph was an, "American" and CS-2 replied, "Chinese." Further, GUOQI ZHANG stated, "Thirty-one years old, thirty-one, thirty-two" and CS-2 agreed, "Depending on the situation, your discretion." Affiant believes GUOQI ZHANG was attempting to match the age of CS-2's customer with an identity of appropriate age.

148. GUOQI ZHANG was continually surveilled from the Richwell Market to a building located at 2889 South Archer Avenue, Chicago, Illinois and, at approximately 10:34 a.m., was observed entering the basement of that building, while carrying a large yellow envelope. Approximately two minutes later, GUOQI ZHANG exited 2889 South Archer with nothing in hand and then departed in Toyota Camry[1]. At approximately 11:28 a.m., the previously identified Chevrolet Van, driven by LI WEN HUANG, parked in the vicinity of 2889 South Archer Avenue. Thereafter, LI WEN HUANG entered the basement of 2889 South Archer Avenue. At approximately 11:42 a.m., LI WEN HUANG exited 2889 South Archer Avenue and departed in the Chevrolet Van and was surveilled driving to and entering 2902 South Emerald Avenue, Chicago, Illinois.<sup>102</sup> Approximately thirty minutes later, LI WEN HUANG was observed exiting 2902 South Emerald Avenue and driving back to 2889 South Archer Avenue. LI WEN HUANG then entered the basement of 2889 South Archer Avenue while carrying an object in LI WEN HUANG's left hand.

149. At approximately 12:30 p.m., GUOQI ZHANG telephonically contacted CS-2 and advised that everything was complete and to meet at the Richwell Market in thirty minutes. CS-2 understood GUOQI ZHANG's statement to mean that a PRC passport and a social security account card were ready to be sold by GUOQI ZHANG.<sup>103</sup> At approximately 12:32 p.m., GUOQI ZHANG, who had been under continuous surveillance, was observed parking Toyota Camry[1] in the vicinity

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<sup>102</sup> Based upon surveillance, to include surveillance conducted on January 9 and 16, 2008, manufacturer, CO-CONSPIRATOR A, has been observed utilizing this residence.

<sup>103</sup> Due to the inability of law enforcement to meet with CS-2, this telephone call was not recorded. Upon receiving the incoming telephone call from GUOQI ZHANG, CS-2 telephonically notified Affiant.

of 2889 South Archer Avenue. Thereafter, GUOQI ZHANG entered the basement of 2889 South Archer Avenue.

150. At approximately 12:53 p.m., CS-2 met with law enforcement officers for the purpose of conducting another consensually recorded meeting with GUOQI ZHANG. At this time, CS-2 and CS-2's vehicle were searched for the presence of Contraband. CS-2 was found to be in possession of a personal sum of money which CS-2 was allowed to retain, the searches were negative in all other respects. Shortly thereafter, CS-2 was equipped with an audio/video recording device, a transmitter and was provided with \$3,000 in pre-recorded funds.

151. At approximately 12:56 p.m., GUOQI ZHANG was observed exiting 2889 South Archer Avenue and departing in the Toyota Camry[1] and several minutes later, LI WEN HUANG and INDIVIDUAL 14 exited 2889 South Archer Avenue and departed in the Chevrolet Van driven by LI WEN HUANG. Meanwhile, CS-2 departed in CS-2's vehicle followed by law enforcement officers, and parked at the Richwell Market. At approximately 1:06 p.m., GUOQI ZHANG parked at the Richwell Market and was observed entering CS-2's vehicle. Approximately ten minutes later, GUOQI ZHANG exited CS-2's vehicle and departed in Toyota Camry[1]. Thereafter, CS-2 was continuously surveilled to a pre-determined location, where the audio/video recording device and transmitter was recovered from CS-2. At that time, CS-2 provided law enforcement officers with a biographically-matched PRC passport, bearing passport number 144587906,<sup>104</sup> and social security

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<sup>104</sup> The name and date of birth listed in this passport matched the identity associated with the purchased social security account card. The PRC passport was submitted to the FDL. A review of the corresponding report revealed that the biographical/photograph page with the security laminate and the last page of the passport had been substituted with counterfeit pages. These counterfeit pages were produced with color ink-jet printing technology and did not conform to comparable genuine specimens on file in the FDL library. Further, based upon the presence of non-original threading, the passport had been disassembled and reassembled.

account card.<sup>105</sup> Additionally, CS-2 and CS-2's vehicle were searched for the presence of Contraband and CS-2 was found only to be in possession of the same amount of personal cash identified previously and no longer in possession of the \$3,000 in pre-recorded funds, but these searches were negative in all other respects. CS-2 advised that while inside CS-2's vehicle, GUOQI ZHANG provided a PRC passport and social security account card to CS-2 and CS-2 provided \$3,000 to GUOQI ZHANG.

152. A review of the recording revealed that CS-2 and GUOQI ZHANG argued over how much money was owed by CS-2 to GUOQI ZHANG. Further, the recording revealed that GUOQI ZHANG provided the name and date of birth corresponding to the mother of the original social security card holder.

153. At approximately 1:27 p.m., after continued surveillance by law enforcement, LI WEN HUANG and INDIVIDUAL 14 were observed approaching GUOQI ZHANG in Toyota Camry[1] while parked in the vicinity of South Archer Avenue and Wentworth Avenue. LI WEN HUANG and INDIVIDUAL 14 appeared to talk with GUOQI ZHANG through the open passenger side window of Toyota Camry[1].

154. A review of ISOS records revealed that at least fifteen Illinois driver's licenses or identification cards have been issued to applicants who utilized passport number 144587906. Furthermore, thirteen of those applicants utilized social security account numbers with the prefix "586." Additionally, two of these applications listed that the vehicle road test was conducted with vehicles bearing Illinois license plates X368118 and X539717, respectively. A review of ISOS

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<sup>105</sup> This social security account card, which lists an account number with the prefix "586," was submitted to the FDL. A review of the corresponding report revealed that this card was authentic and had not been altered.

records revealed that both license plates are registered to SONG YAN SHI at 1916 South Wells Street, Unit 1, Chicago, Illinois.

**W. February 28, 2008: Physical Surveillance of YIYI SHI, TIANSHENG ZHANG, DONG DONG GUO and JUN SHUN ZHANG**

155. As described elsewhere in this Affidavit, based upon surveillance and information from CS-1 and CD-1, it is believed that JUN YUN ZHANG manufactures PRC passport inside his residences located at 2734 South Wentworth Avenue, Units 310 and 408, Chicago, Illinois, and that brokers deliver passport photographs and pick-up fraudulent documents from those locations. On February 28, 2008, surveillance was conducted at 2734 South Wentworth Avenue. At approximately 8:36 a.m., TIANSHENG ZHANG was observed exiting 2734 South Wentworth Avenue and entering the driver's seat of the Mazda 6, which was also occupied with three Asian individuals. Thereafter, TIANSHENG ZHANG drove to the Thompson Center, located at 100 West Randolph Street, Chicago, Illinois, where, an Asian male ("CUSTOMER Y") exited the Mazda 6 and entered the Thompson Center. There is an ISOS Driver Services Facility located within the Thompson Center ("Chicago Central Facility"). A review of ISOS records revealed that on February 28, 2008, CUSTOMER Y obtained a Driver's Permit from the Chicago Central Facility and a driver's license from the Midlothian Facility. Moreover, ISOS records indicated that CUSTOMER Y utilized a social security account number with the prefix "586" and used the residential address of 226 West 26th Street, Chicago, Illinois. Further investigation revealed that 226 West 26th Street was not a valid address, but had been utilized numerous times by this criminal enterprise. More specifically, between January 1, 2003 and December 10, 2008, approximately 15,666 Illinois drivers' licenses and identification cards were issued to individuals utilizing social security account numbers with the prefix "586." A review of the residential address utilized by such

individuals revealed the following patterns ( the approximate number of individuals using the particular address listed below is included in parenthesis):

- a. 222 West 22nd Street (16 individuals);
- b. 223 West 23rd Street (38 individuals);
- c. 224 West 24th Street (39 individuals);
- d. 225 West 25th Street (4 individuals);
- e. 226 West 26th Street (38 individuals);
- f. 227 West 27th Street (11 individuals);
- g. 228 West 28th Street (9 individuals); and
- h. 229 West 29th Street (17 individuals).<sup>106</sup>

Based on surveillance, all of the above addresses are fictitious with the exception of 222 West 22nd Street, which is associated with a bank, and 224 West 24th Street, which appears to be a three unit residential building.

156. At approximately, 9:58 a.m., YIYI SHI, driving Toyota Camry[3], was observed parking in front of 2734 South Wentworth Avenue, at which time, an Asian female exited 2734 South Wentworth Avenue and entered Toyota Camry[3]. Approximately thirty minutes later, TIANSHENG ZHANG, driving the Mazda 6, was observed parked in the alleyway behind JUN YUN ZHANG's residence, at which time, law enforcement lost visual contact with the Mazda 6. Approximately ten minutes later, the Mazda 6 parked behind a Nissan Pathfinder (“Pathfinder”)

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<sup>106</sup> Affiant believes that the these primarily numeric based addresses, which contain repetitive number sequences, are being intentionally utilized due to the fact that these addresses are easier for the non-English speaking customers, who are purchasing fraudulent documents, to memorize prior to entering an ISOS Driver Services Facility.

bearing New York license plate CDU2423. Thereafter, DONG DONG GUO was observed exiting the Mazda 6, which had formerly been driven by TIANSHENG ZHANG, and an Asian male exited the passenger side seat. DONG DONG GUO then handed the Asian male a white envelope and the Asian male entered the back seat of the Pathfinder.<sup>107</sup> At approximately 12:12 p.m, JUN SHUN ZHANG was observed entering a Honda, bearing Illinois license plate X560768,<sup>108</sup> which was parked in the vicinity of 2734 South Wentworth Avenue. Between approximately 12:15 p.m. and 4:40 p.m., law enforcement observed a) DONG DONG GUO transport an Asian male ("CUSTOMER Z") to the Chicago Central Facility and an Asian female ("CUSTOMER AA") to the Chicago North Facility; b) JUN SHUN ZHANG transport two Asian males ("CUSTOMER BB" and "CUSTOMER CC") to the Chicago North Facility; and c) TIANSHENG ZHANG transport two Asian males ("CUSTOMER DD" and "CUSTOMER EE") to the Chicago North Facility. A review of ISOS records revealed CUSTOMER Z, CUSTOMER AA, CUSTOMER BB, CUSTOMER CC, CUSTOMER DD and CUSTOMER EE obtained either an identification card, driver's license or made unsuccessful attempts to pass the ISOS Vehicle Road Test. On February 28, 2008, CUSTOMER Z, CUSTOMER AA, CUSTOMER CC, CUSTOMER DD and CUSTOMER EE utilized social security account numbers with the prefix "586."

**X. April 2008: CD-1 Utilized Fraudulent Personal Identification Documents Obtained from JUN YUN ZHANG to Obtain Illinois Driver's license**

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<sup>107</sup> A query of New York vehicle registration records revealed license plate CDU2423 was registered to INDIVIDUAL 15 with an address of 975 Center Drive, Franklin Square, New York.

<sup>108</sup> A review of ISOS records revealed that license plate X560768 is registered to Jun S. Zhang (JUN SHUN ZHANG) residing at 7403 West Irving Park Road, Chicago, Illinois.

157. Based upon information provided by CD-1, in April 2008, CD-1 utilized an altered PRC passport with CD-1's photograph, a social security card, bearing an account of number with the prefix "586", and addressed envelope to obtain an Illinois driver's license in an alias identity. CD-1 advised law enforcement that CD-1 obtained the passport, social security account card and addressed envelope from JUN YUN ZHANG. A review of the associated ISOS driver's license application relative to this driver's license revealed that passport number "148032596" was utilized by CD-1. Based upon a review of approximately 1676 ISOS driver's license and identification card applications from approximately 2006 to 2008, which were obtained during the course of this investigation, it was determined that passport number "148032596" has been utilized approximately 57 times by various applicants.<sup>109</sup> As previously mentioned, since the PRC passports are frequently returned by a broker after being used by a specific customer, the passport can be altered additional times and re-used by numerous customers. Approximately forty of these applicants utilized social security account numbers with the prefix "586." In relation to the applications, in which the driver's license applicant utilized passport number 148032596, the following chart details Illinois license plates which were also referenced on such applications. Based upon the investigation to date, it is believed that the license plates listed in the chart are associated with the identified brokers.

Frequency Utilized	Illinois License Plate	Broker
1	5758110 (Toyota Camry[1])	GUOQI ZHANG

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<sup>109</sup> ISOS does not require the passport number to be written on the application. However, of the approximately 1676 applications reviewed, approximately 750 applications listed such information.

5	7091137 (Mazda 6)	TIANSHENG ZHANG
5	9251439 (Toyota Solara)	DONG DONG GUO
3	G848892 <sup>110</sup>	JUN SHUN ZHANG
1	X560768 (Nissan Sentra)	JUN SHUN ZHANG

**Y. May 14, 2008: CS-2 Purchased Fraudulent Personal Identification Documents From JUN YUN ZHANG.**

158. CS-2 provided information to law enforcement officers indicating that JUN YUN ZHANG, who CS-2 knows as "LAO SZE," was involved in manufacturing PRC passports based upon conversations with JUN YUN ZHANG in approximately 2001. CS-2 identified a photograph of JUN YUN ZHANG for law enforcement officers. More specifically, CS-2 told law enforcement officers that CS-2 met with JUN YUN ZHANG in about December 2001 at CS-2's business, which was located in Chicago's Chinatown community at that time. Around this same time, CS-2 had learned from other individuals in the Chinatown community that JUN YUN ZHANG was violent and involved in fraudulent documents. On December 5, 2001, CS-2 informed law enforcement agents that JUN YUN ZHANG unexpectedly approached CS-2 which resulted in a conversation. During this unrecorded conversation, CS-2 stated to agents that JUN YUN ZHANG asked CS-2 to go into "business" together. Based on the context of the conversation, CS-2 believed that JUN YUN ZHANG was asking CS-2 to help with the fraudulent document business run by JUN YUN ZHANG. CS-2 believed he/she was asked to help because JUN YUN ZHANG knew that CS-2 spoke English and had knowledge of immigration procedures. Based on what CS-2 had heard about

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<sup>110</sup> A review of ISOS records revealed that license plate G848892 is registered to Jun S. Zhang (JUN SHUN ZHANG) residing at 7403 West Irving Park Road, Chicago, Illinois.

JUN YUN ZHANG's reputation, CS-2 was afraid of JUN YUN ZHANG. As a result, CS-2 declined JUN YUN ZHANG's request to help with the fraudulent document business.

159. On May 8, 2008, CS-2 met with law enforcement officers and participated in a consensually recorded telephone conversation with JUN YUN ZHANG. At approximately 3:16 p.m., CS-2 called **SUBJECT PHONE 2** and spoke with JUN YUN ZHANG. During the conversation, CS-2 advised JUN YUN ZHANG that CS-2 had a friend who had just a photograph and further stated, "He wants a passport and social security number." JUN YUN ZHANG then asked about the age of CS-2's friend and CS-2 advised JUN YUN ZHANG of the age and sex of CS-2's friend. Further, JUN YUN ZHANG stated, "Is the passport to be carried away?", at which time, CS-2 replied affirmatively. JUN YUN ZHANG advised that JUN YUN ZHANG would call CS-2 back in thirty minutes regarding the price. At approximately 4:03 p.m., CS-2 conducted a consensually recorded telephone call to **SUBJECT PHONE 2** and spoke with JUN YUN ZHANG.<sup>111</sup> During this conversation, JUN YUN ZHANG advised that the price for the passport and social security account card would be \$1,300. JUN YUN ZHANG and CS-2 agreed to meet on May 14, 2008.

160. On May 14, 2008, CS-2 met with law enforcement officers and participated in a consensually recorded telephone conversation with JUN YUN ZHANG. At approximately 10:23 a.m., CS-2 called **SUBJECT PHONE 2** and spoke with JUN YUN ZHANG. During the course of the conversation, JUN YUN ZHANG advised that it would take about an hour to complete the documents. Further, CS-2 and ZHANG agreed to meet at a gas station located at the intersection

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<sup>111</sup> The information regarding this conversation is based on law enforcement officers' debriefing of CS-2 because upon reviewing the recording, it was determined that only three seconds of the conversation were recorded.

of Archer Avenue and Halsted Avenue which was a Citgo.

161. On May 14, 2008, at approximately 10:45 a.m., law enforcement officers searched CS-2 and CS-2's vehicle for the presence of Contraband. These searches revealed that CS-2 was in possession of a personal sum of money which CS-2 was allowed to retain, but the searches were negative in all other respects. Thereafter, law enforcement officers provided CS-2 with a passport photograph of an undercover officer ("UCO-4") and \$500 in pre-recorded funds. The passport photograph was placed inside a gold envelope. Further, CS-2 was equipped with an audio and video recording device as well as a transmitter. At approximately 10:53 a.m., CS-2 departed in CS-2's vehicle under continuous law enforcement surveillance.

162. At approximately 10:59 a.m., CS-2 parked in a lot which adjoined the Citgo gas station, at which time, CS-2 exited CS-2's vehicle. Shortly thereafter, law enforcement officers observed CS-2, carrying a gold envelope, approach a white Toyota Camry, bearing Illinois license plate 5602211 ("Toyota Camry[8]"),<sup>112</sup> which was driven by JUN YUN ZHANG. After a brief conversation, CS-2 was observed walking back to CS-2's vehicle without the gold envelope. At that point, JUN YUN ZHANG departed and was surveilled driving to JUN YUN ZHANG's residence located at 2734 South Wentworth Avenue, Chicago, Illinois. Law enforcement officers maintained a brief surveillance of CS-2, at which time, CS-2 departed with law enforcement officers due to the fact that CS-2 had locked CS-2's keys inside CS-2's vehicle. Soon thereafter, CS-2 was searched for Contraband, which revealed that CS-2 was only in possession of the same personal sum of money previously identified and no longer possessed the gold envelope provided by law

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<sup>112</sup> A query of ISOS vehicle registration records revealed that license plate 5602211 was registered to Jun Zhang (JUN YUN ZHANG) with an address of 3028 South Emerald Avenue, Chicago, Illinois.

enforcement, nor the \$500 in pre-recorded funds, and the searches were negative in all other respects. At approximately 11:50 a.m., law enforcement officers transported CS-2 back to CS-2's vehicle. Under law enforcement surveillance, CS-2 drove CS-2's vehicle to a predetermined location. Thereafter, CS-2's vehicle was searched for Contraband with negative results.

163. CS-2 was debriefed and advised law enforcement officers that when CS-2 was approaching the gas station, CS-2 received an incoming telephone call from **SUBJECT PHONE 2**, at which time, JUN YUN ZHANG stated that JUN YUN ZHANG was already at the gas station. Further, CS-2 advised that upon parking at the gas station, CS-2 walked to JUN YUN ZHANG's vehicle and had a brief conversation with JUN YUN ZHANG. During this conversation, CS-2 provided the gold envelope containing the passport photograph of UCO-4 as well as \$500 to JUN YUN ZHANG. This information is corroborated by the audio and video recordings from the equipment worn by CS-2 during this meeting.

164. At approximately 12:45 p.m., CS-2 called **SUBJECT PHONE 2** and spoke with JUN YUN ZHANG. During this recorded conversation, JUN YUN ZHANG asked if CS-2 wanted an "address," at which time, CS-2 advised that CS-2 did not care about the address. Based upon CS-2's experience, CS-2 understood that JUN YUN ZHANG was asking if CS-2's friend needed a fraudulent letter or postmarked envelope in order to show residency to support an application for a state issued driver's license or identification card. JUN YUN ZHANG and CS-2 agreed to meet at approximately 1:00 p.m that same day. Shortly thereafter, CS-2 and CS-2's vehicle were searched for Contraband. These searches revealed CS-2 to be in possession of only the same personal sum of money previously identified, but these searches were negative in all other respects. Additionally, CS-2 was provided with \$800 in pre-recorded funds and equipped with an audio and video recording

device as well as a transmitter. The \$800 in pre-recorded funds represented the remaining balance that was owed to JUN YUN ZHANG based upon the negotiated price of \$1,300 for the passport and social security account card. Subsequently, CS-2 departed in CS-2's vehicle under constant law enforcement surveillance.

165. At approximately 1:06 p.m., CS-2 parked in the lot which adjoined the previously identified Citgo gas station, at which time, CS-2 exited CS-2's vehicle. Law enforcement officers observed CS-2 walk to JUN YUN ZHANG's vehicle (Toyota Camry[8]) which law enforcement observed arrive several minutes prior to CS-2's arrival. Thereafter, JUN YUN ZHANG was observed handing a maroon colored object to CS-2 and CS-2 was observed handing a sum of U.S. currency to JUN YUN ZHANG. After a brief conversation, CS-2 departed in CS-2's vehicle to a pre-determined location while under continuous law enforcement surveillance. At that location, CS-2 provided law enforcement officers with a biographically matched maroon-colored PRC passport, bearing UCO-4's picture, and a social security account card, bearing a number with the prefix "586."<sup>113</sup> The audio and video recording device and transmitter were also recovered by law enforcement officers. CS-2 and CS-2's vehicle were searched for Contraband. CS-2 was only found to be in possession of the same personal sum of money previously identified, but the searches were negative in all other respects.

166. CS-2 was debriefed and advised law enforcement officers that after CS-2 arrived at the gas station, CS-2 approached JUN YUN ZHANG's vehicle, at which time JUN YUN ZHANG provided a PRC passport and social security account card to CS-2. Also at this time, CS-2 provided

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<sup>113</sup> The PRC passport and social security account card are pending analysis for authenticity by the FDL.

\$800 in pre-recorded funds to JUN YUN ZHANG. During the ensuing conversation, CS-2 discussed the availability of social security cards. A review of the recorded conversation revealed that JUN YUN ZHANG stated, "In the past, I had to apply to get the work cards" and further stated, "No need to apply" and "I just buy." Also during the conversation, CS-2 stated in part, "If this person cannot take the test, can you help?" and JUN YUN ZHANG replied, "I can too." CS-2 stated, "How much is needed, including driver's license, social security number and passport?" JUN YUN ZHANG stated in part, "If don't know how to drive, two to three hundred dollars." CS-2 understood JUN YUN ZHANG's statement to mean that if CS-2's friend could not take the driving test, JUN YUN ZHANG would charge \$1,300 plus an additional \$200 to \$300, due to the fact that JUN YUN ZHANG would have to bribe someone in order to obtain the driver's license.

167. Also during the conversation, CS-2 made reference to previous purchases of fraudulent documents from broker GUOQI ZHANG. Specifically, CS-2 stated, "That ZHANG GUOQI, I first time, I worked with him last year and he charged me \$3,500" and also stated, "Furthermore, that ZHANG GUOQI, does ZHANG GUOQI go to you and do?" JUN YUN ZHANG advised, "He'd (GUOQI ZHANG) go to my old lover, [CO-CONSPIRATOR A]." CS-2 understood JUN YUN ZHANG's statement to mean that CO-CONSPIRATOR A was altering PRC passports and selling such passports and social security account cards to GUOQI ZHANG. Later in the conversation, CS-2 asked, "He (GUOQI ZHANG) has come to you to get it, hasn't he?" and JUN YUN ZHANG stated, "Very rarely." Also during this conversation, JUN YUN ZHANG stated, "I wanted you to do business with Wenzhou people. Very easy to make money" and later stated, "And so, to get the Wenzhou clients out. You get them out, I'll receive them. Fifteen hundred dollars will do." Based upon the context of the conversation, CS-2 understood JUN YUN ZHANG's statement

that if CS-2 could smuggle Chinese nationals from Wenzhou, PRC into the U.S., JUN YUN ZHANG would provide them with fraudulent identification documents for a fee of \$1,500. After concluding this conversation, CS-2 departed in CS-2's vehicle and met with law enforcement officers.

**Z. July 31, 2008: Consensually Recorded Telephone Calls Between CS-2 and JUN YUN ZHANG Regarding Social Security Account Cards.**

168. On July 31, 2008, CS-2 met with law enforcement officers and participated in a consensually recorded telephone conversation with JUN YUN ZHANG. At approximately 10:43 a.m., CS-2 called **TARGET PHONE 1**<sup>114</sup> and spoke with JUN YUN ZHANG. During the conversation, CS-2 stated that CS-2 knew of a person who wanted a social security card, at which time, JUN YUN ZHANG replied, "Only social security card?" Further, JUN YUN ZHANG asked where the person was currently located and then advised that JUN YUN ZHANG would call CS-2 back in a few minutes.

169. At approximately 11:22 a.m., while in the presence of law enforcement officers, CS-2 received an incoming call from **TARGET PHONE 2**<sup>115</sup> as identified by CS-2's telephone's caller identification feature. Thereafter, CS-2 recognized the voice of the caller as JUN YUN ZHANG. During this conversation, CS-2 asked, "Can you get the social security numbers?", at which time,

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<sup>114</sup> During a consensually recorded meeting between CS-2 and JUN YUN ZHANG on July 21, 2008, JUN YUN ZHANG provided a contact telephone number of (646)284-4983 (**TARGET PHONE 1**). Telephone records show that telephone number (646)284-4983 was subscribed to by QIONG ZHOU, with an address of 37 Monroe Street, New York, New York and billed to QIONG ZHOU with an address of 1405 Capitol Drive, Unit G, Pewaukee, Wisconsin.

<sup>115</sup> Telephone records show that telephone number (312)863-1467 was a pre-paid cellular telephone, with no subscriber information available.

JUN YUN ZHANG stated, "How many do you want?" CS-2 indicated that CS-2 wanted "five" and JUN YUN ZHANG stated, "Don't have the ones for older ages," and also stated, "Only around age thirty." CS-2 asked about the price of each card and JUN YUN ZHANG advised, "One piece, I will add one hundred to it, because he/she sells them to me at nine hundred." CS-2 understood JUN YUN ZHANG's statement to mean that JUN YUN ZHANG would sell social security account cards to CS-2 for \$1,000 each. Later in the conversation, JUN YUN ZHANG advised CS-2 that the social security account cards were not signed.

**AA. Information Provided by CD-2 Relative to XIN LI WANG**

170. During an interview with law enforcement officers, CD-2 advised that in approximately December of 2006, CD-2 had a friend who was in need of obtaining an identification card. Consequently, CD-2 contacted JUN YUN ZHANG for assistance, but JUN YUN ZHANG advised CD-2 to contact "Tony." CD-2 has identified a photograph of XIN LI WANG as "Tony" for law enforcement officers. Thereafter, CD-2 coordinated with XIN LI WANG who agreed to assist CD-2's friend obtain an Illinois identification card for a fee of \$1,300. CD-2 advised that CD-2 and CD-2's friend were subsequently transported by CO-CONSPIRATOR C to the Chicago South Facility. While in the vicinity of the Chicago South Facility, CD-2 observed CO-CONSPIRATOR C coordinate with a ISOS Public Service Representative in furtherance of obtaining an identification card for CD-2's friend. CD-2 advised that during this process, CD-2 provided \$600 to the ISOS Public Service Representative and \$700 to CO-CONSPIRATOR C. Also during this process the ISOS Public Service Representative provided an identification card application to CD-2's friend to sign. Through observation and conversation with CD-2's friend, CD-2 was aware that CD-2's friend eventually went inside the Chicago South Facility and obtained an identification card without ever

providing any form of personal identification.

171. CD-2 also advised that at an unspecified time, CD-2 purchased a counterfeit social security account card from XIN LI WANG for a fee of \$200.

**BB. September 2008: Wire Interceptions of XIN LI WANG and a Consensually Recorded Telephone Call Between UCO-2 and XIN LI WANG**

172. Based upon a review of CPD records, witness interviews, information provided by CS-1, Court authorized wire interceptions and a review of advertisements placed in the World Journal, XIN LI WANG is a broker that works with JUN YUN ZHANG. More specifically, on approximately February 1, 2006, XIN LI WANG and approximately seven other Asian individuals were arrested for possession of fraudulent identification cards or making false statements on an application, in the vicinity of the Chicago South Facility by CPD. This arrest was predicated upon community complaints of suspicious loitering in the vicinity of the Chicago South Facility. Subsequent investigation on February 1, 2006, revealed that several of the Asian individuals had been smuggled into the U.S. and had obtained or were seeking to obtain Illinois identification documents.<sup>116</sup> Additionally, an Asian male ("CUSTOMER FF") provided a statement to CPD officers after receiving and waiving his Miranda warnings. CUSTOMER FF advised that while residing in New York, CUSTOMER FF saw an advertisement in a Chinese newspaper relative to obtaining a Chicago driver's license. Thereafter, CUSTOMER FF called the advertised telephone number, (917)667-2808,<sup>117</sup> and spoke with an Asian male who identified himself as "MR. WANG."

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<sup>116</sup> Two of the individuals arrested possessed social security account cards listing account numbers with the prefix "586."

<sup>117</sup> Investigation revealed telephone number (917)667-2808 was subscribed to by INDIVIDUAL 16 with an address of 2227 South Wentworth Avenue, Chicago, Illinois.

Subsequently, CUSTOMER FF traveled by bus and arrived in Chicago on January 31, 2006, at which time, CUSTOMER FF called "MR. WANG" at (917)667-2808 and was picked-up by "MR. WANG" in a white Toyota. During the interview, CUSTOMER FF identified an Illinois driver's license depicting XIN LI WANG as being "MR. WANG." CUSTOMER FF further advised that after being picked-up, XIN LI WANG provided fake documents to CUSTOMER FF and provided the answers to the written driver's license test. CUSTOMER FF stated that CUSTOMER FF was transported to a facility, where CUSTOMER FF obtained an Illinois identification card and was likewise able to pass the written examination.<sup>118</sup> Further, CUSTOMER FF advised that XIN LI WANG had transported CUSTOMER FF on February 1, 2006, in an attempt for CUSTOMER FF to obtain a driver's license, however, CUSTOMER FF and XIN LI WANG were arrested. CUSTOMER FF advised that CUSTOMER FF had paid \$600 to XIN LI WANG.

173. On February 1, 2006, XIN LI WANG was interviewed following his arrest in the vicinity of the Chicago South Facility. After being provided Miranda warnings and waiving his rights, XIN LI WANG provided a limited amount of information to law enforcement officers. During this interview, XIN LI WANG indicated that XIN LI WANG utilized telephone number (917)667-2808. As previously indicated, XIN LI WANG was arrested for Making a False Application or Affidavit for a Driver's License. The case related to XIN LI WANG's arrest was later *Nolle Prosequi*.

174. On March 2, 2007, CS-1 identified a photograph of XIN LI WANG as being "TONY." Further, through CS-1's involvement with JUN YUN ZHANG, CS-1 advised that XIN

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<sup>118</sup> A review of ISOS records revealed that CUSTOMER FF obtained an identification card on January 31, 2006.

LI WANG was a courier, at times, who worked for JUN YUN ZHANG.

175. On June 16, 2008, an FBI contract linguist reviewed advertisements in the May 19, 2008, World Journal, Chicago Edition, which revealed an advertisement preliminarily translated as, "Expedite driver's license", "Guarantee passing", "Chicago driver's license", "Money back guarantee", "Tony 917-667-2808."

176. As previously mentioned, on August 29, 2008, Acting Chief Judge Ronald A. Guzman signed Orders authorizing the interception of wire communications to and from **TARGET PHONE 1** and **TARGET PHONE 2**, which were telephones identified as being utilized by JUN YUN ZHANG and QIONG ZHOU. On September 12, 2008, at approximately 1:02 p.m., JUN YUN ZHANG, using **TARGET PHONE 1**, received an incoming call (Call #430) from telephone number (917)667-2808, which is believed to be utilized by XIN LI WANG, as previously set forth. During this conversation, XIN LI WANG stated that, "Customers keep calling" (believed to be a reference to customers seeking fraudulent identification documents) and that XIN LI WANG was not able to get any "cards" (social security account cards). Further, XIN LI WANG stated that if XIN LI WANG got "some (social security account cards)," LAO SAN's (JUN YUE ZHANG) wife (MANUFACTURER A) was able to make the "document (altered PRC passport)." JUN YUN ZHANG advised XIN LI WANG that JUN YUN ZHANG had only, "Three or four left (three or four social security account cards)." In response, XIN LI WANG asked, "What is the age?", at which time, JUN YUN ZHANG replied, "Around 30" (a reference to the age of the true social security account card holder that was issued the social security account card). XIN LI WANG further clarified, "Do you have any in the 40s" and JUN YUN ZHANG replied, "No more." JUN YUN ZHANG also stated that the three or four that JUN YUN ZHANG had are "males" and that

XIN LI WANG could come over and get them. Also during this conversation, XIN LI WANG stated that XIN LI WANG got "some (social security account cards)" from LAO SAN (JUN YUE ZHANG), but there were no more left. JUN YUN ZHANG replied that JUN YUN ZHANG had given LAO SAN (JUN YUE ZHANG), "Around ten" before. At the conclusion of the conversation, XIN LI WANG advised JUN YUN ZHANG that, "When I get the customer I will get it (social security card) from you (JUN YUN ZHANG) and bring it over to LAO SAN (JUN YUE ZHANG)..... get it typed, okay?" JUN YUN ZHANG then replied affirmatively. It is believed that, "get it typed" is a reference to manufacturing an altered biographical page for a PRC passport.

177. On September 14, 2008, at approximately 8:14 p.m., UCO-2 called telephone number (917)667-2808 and conducted a consensually recorded conversation with XIN LI WANG.<sup>119</sup> During this conversation, UCO-2 asked, "Is this Tony?" and XIN LI WANG replied, "Tony? Right." Thereafter, UCO-2 stated, "You, that, I saw in the newspaper, you make Chicago driver's license," at which time, XIN LI WANG asked, "Do you have social security card?" UCO-2 advised XIN LI WANG that UCO-2 did not have a social security account card and XIN LI WANG advised, "Without social security card, then can't do it." XIN LI WANG then asked about UCO-2's age and whether UCO-2 could drive. UCO-2 indicated that UCO-2 was 37 years old and could slightly drive. XIN LI WANG then stated, "Okay, okay, that is it" and terminated the telephone call.

**CC. September 2- 21, 2008: Wire Interceptions Involving JUN YUN ZHANG, CS-2, TIANSHENG ZHANG, CO-CONSPIRATOR A, JUN YUE ZHANG and a Consensually Recorded Telephone Call Between UCO-2 and JUN YUE ZHANG**

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<sup>119</sup> UCO-2 has determined the voice of the recipient of this telephone call to be consistent with the voice intercepted during the telephone call between JUN YUN ZHANG and XIN LI WANG.

178. On September 2, 2008, at approximately 4:36 p.m., JUN YUN ZHANG, using **TARGET PHONE 1**, placed an outgoing call (Call #9) to CS-2. During this conversation, JUN YUN ZHANG asked if CS-2 would be coming tomorrow. CS-2 indicated that CS-would be there (Chicago, Illinois) at approximately 9:00 a.m. and asked JUN YUN ZHANG, "Five pieces, okay?" JUN YUN ZHANG replied, "Fine." Based upon previous direction provided to CS-2 by law enforcement officers, CS-2 was instructed to purchase five social security account cards ("Five pieces") from JUN YUN ZHANG.

179. On September 2, 2008, at approximately 4:37 p.m., JUN YUN ZHANG, using **TARGET PHONE 1**, placed an outgoing call (Call #10) to CO-CONSPIRATOR A at telephone number (773)407-8838.<sup>120</sup> During this conversation, CO-CONSPIRATOR A stated in part, "You know Aini (phonetic), who was with Guo, he/she wants a driver's license. Can you do it?" JUN YUN ZHANG replied, "I don't do it now." Based upon additional intercepted conversations detailed herein and other investigation, to include a consensually recorded telephone call between UCO-2 and DONG DONG GUO on September 14, 2008, it is believed that at this time, JUN YUN ZHANG curtailed his involvement in the criminal enterprise due to the fact that JUN YUN ZHANG suspected that the criminal enterprise was under investigation. Further, based upon additional intercepted communications, it is believed that JUN YUN ZHANG was concerned about being deported back to the PRC, presumably in the event that JUN YUN ZHANG was arrested, and

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<sup>120</sup> Subpoenaed records indicated that telephone number (773)407-8838 was subscribed to by CO-CONSPIRATOR A with an address of 8007 Hillcrest Lane, Tinley Park, Illinois. Based upon subscriber information and voice comparison with a previously obtained consensually recorded conversation between CS-1 and CO-CONSPIRATOR A, it is believed that CO-CONSPIRATOR A was the recipient of this telephone call.

therefore JUN YUN ZHANG was advising people that JUN YUN ZHANG was minimizing his involvement in criminal activities until JUN YUN ZHANG could resolve his immigration status in the U.S.

180. On September 2, 2008, at approximately 5:09 p.m., JUN YUN ZHANG, utilizing **TARGET PHONE 1**, placed an outgoing call (Call #13) to a Fuzhou Chinese speaking male at telephone number (312)714-0034.<sup>121</sup> During this conversation, TIANSHENG ZHANG said that TIANSHENG ZHANG would have "people" (customers) coming around the "16th" and they would be in their 20's or 30's. TIANSHENG ZHANG stated that TIANSHENG ZHANG had not been placing any advertisements in the newspaper. Further, JUN YUN ZHANG told TIANSHENG ZHANG to take it over to "LAO SAN" (JUN YUE ZHANG) to "do it (manufacture PRC passport)."

181. On September 3, 2008, at approximately 11:28 a.m., JUN YUN ZHANG, using **TARGET PHONE 1**, received an incoming call (Call #46) from CS-2, which CS-2 made at the direction of law enforcement officers. During this conversation, CS-2 stated, "I have the money with me. Can we meet somewhere," at which time, JUN YUN ZHANG provided a meeting location. Further, CS-2 stated, "Do you have all cards with you?" and JUN YUN ZHANG replied, "Yes, I have them all."

182. On September 3, 2008, following this telephone call, CS-2, at the direction of and

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<sup>121</sup> Investigation revealed that telephone number (312)714-0034 was subscribed to by INDIVIDUAL 5 with an address of 5050 South Lake Shore Drive, Chicago, Illinois. As previously mentioned, based upon ICE records, INDIVIDUAL 5 is believed to be TIANSHENG ZHANG's father. Based upon physical surveillance and a review of tenant logs for the multi-unit residential building located at 5050 South Lake Shore Drive, it is believed that TIANSHENG ZHANG resides at that location. Given that the previously referenced Mazda 6, which is extensively utilized by TIANSHENG ZHANG, is registered to INDIVIDUAL 5 and based upon the content of the wire interceptions detailed hereinafter, it is believed that TIANSHENG ZHANG is utilizing telephone number (312)714-0034.

under the supervision of law enforcement officers, met with JUN YUN ZHANG and purchased five social security account cards, which all listed account numbers with the prefix "586", for \$5,000. Additionally, JUN YUN ZHANG provided some identifying information relative to the individuals who had been originally issued the cards, to include the card holder's date of birth, sex and mother's name. Prior to and after meeting with JUN YUN ZHANG, CS-2 and CS-2's vehicle were searched for Contraband with negative results. Further, CS-2 was equipped with an audio and video recording device in conjunction with the aforementioned meeting with JUN YUN ZHANG. A review of the recorded conversation revealed that JUN YUN ZHANG stated that the social security cards were from Saipan and that, "Because they came as laborers, they (account numbers) are all 586s." Further, JUN YUN ZHANG stated, "These people (original card holders) are all in China. If in the U.S. who would sell these cards" (believed to be a reference to difficulty with having two people attempting to utilize the same social security account number in the U.S.). Further, JUN YUN ZHANG stated that the "Department of Transportation" could now trace the numbers (believed to be a reference to the fact that driver's license and identification card applicants' social security account numbers are cross referenced with the Social Security Administration).

183. On September 8, 2008, at approximately 11:41 a.m., JUN YUN ZHANG, using **TARGET PHONE 1**, placed an outgoing call (Call #239) to an unknown Mandarin Chinese speaking male. During this conversation, JUN YUN ZHANG asked if the unknown male wanted to do "business", at which time, the unknown male stated, "Yes." The unknown male stated that the unknown male had a "number (social security account number)," but did not have a "card (social security account card)." JUN YUN ZHANG advised the unknown male to check with JUN YUN

ZHANG's brother, "LAO SAN" (JUN YUE ZHANG), at telephone number (312)545-7794,<sup>122</sup> to see if LAO SAN (JUN YUE ZHANG) "had it (social security account card)." Also during this conversation, JUN YUN ZHANG stated, "I temporarily stop now. I am processing the immigration matter." Later in the conversation, JUN YUN ZHANG reiterated that JUN YUN ZHANG had not been doing any business for a month and that JUN YUN ZHANG could only resume business once JUN YUN ZHANG's "status" was settled.

184. On September 12, 2008, at approximately 1:31 p.m., JUN YUN ZHANG, utilizing **TARGET PHONE 2**, placed a call (Call#144) to JUN YUE ZHANG at telephone number (312)545-7794.<sup>123</sup> During this telephone call, JUN YUN ZHANG asked if JUN YUE ZHANG had used all of JUN YUE ZHANG's "supplies (social security account cards)", at which time JUN YUE ZHANG stated that, "Supplies are all used up." Further, JUN YUN ZHANG stated that JUN YUE ZHANG could give JUN YUN ZHANG the "machine of making flowers" if JUN YUE ZHANG wanted. It is believed that JUN YUN ZHANG was making reference to a laminating machine that is utilized to place a clear overlay over the passport photograph and biographical page of a passport. This clear overlay contains a colored flower emblem which is positioned at the base of the passport photograph.

185. On September 14, 2008, at approximately 6:16 p.m., UCO-2 placed a call to telephone number (312)545-7794 and conducted a consensually recorded conversation with JUN

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<sup>122</sup> Subpoenaed records indicated that telephone number (312)545-7794 was subscribed to by INDIVIDUAL 17 with an address of 239 West 24th Street, Chicago, Illinois.

<sup>123</sup> Based upon other intercepted calls in which JUN YUN ZHANG has instructed other individuals to contact JUN YUE ZHANG at telephone number (312)545-7794 and the fact that voice comparisons with other interceptions in which JUN YUE ZHANG identifies himself as "LAO SAN", it is believed JUN YUE ZHANG was the recipient of this call.

YUE ZHANG.<sup>124</sup> During the course of this conversations, UCO-2 stated, "Excuse me, make driver's licenses?", at which time, JUN YUE ZHANG replied, "Oh, right." UCO-2 then asked, "Where is it, is it for Chicago?" and JUN YUE ZHANG replied, "Right." Subsequently, UCO-2 asked, "How much?" and JUN YUE ZHANG responded, "Do you have social security card" and UCO-2 replied, "No." JUN YUE ZHANG then advised that without a social security account card, "There is no way" and terminated the conversation. Based upon other intercepted calls during this time period, it is believed that the there was minimal availability of social security account cards to be utilized by this criminal enterprise.

186. On September 14, 2008, at approximately 9:46 p.m., JUN YUN ZHANG, using **TARGET PHONE 1**, received an incoming call (Call #515) from an unknown Mandarin Chinese speaking female. During this conversation, JUN YUN ZHANG told the unknown female that JUN YUN ZHANG's son (DONG DONG GUO) bought a carry-out restaurant in Washington D.C. for a, "[H]undred some thousand dollars" and that JUN YUN ZHANG was the one who had actually paid for it. Further, JUN YUN ZHANG advised that JUN YUN ZHANG had purchased a few houses in China for about two million Chinese Yuan (approximately \$285,000 U.S.), had lent out over \$100,000, and had lost over \$30,000 in a casino. It should be noted that JUN YUN ZHANG is not authorized to work in the U.S. and has no known source of legitimate income.

187. On September 15, 2008, at approximately 12:30 p.m., JUN YUN ZHANG, utilizing **TARGET PHONE 1**, received an incoming telephone call (Call #534) from TIANSHENG ZHANG. During this conversation, TIANSHENG ZHANG advised that TIANSHENG ZHANG

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<sup>124</sup> It is believed JUN YUE ZHANG answered this telephone call based upon voice comparison with previously referenced intercepts identified as being JUN YUE ZHANG.

had been "pushed" by many customers, but could not give them an answer because TIANSHENG ZHANG did not know if JUN YUN ZHANG was "still doing it (fraudulent document business)." JUN YUN ZHANG replied that JUN YUN ZHANG would let TIANSHENG ZHANG know when JUN YUN ZHANG started doing "it" again.

188. On September 17, 2008, at approximately 10:53 a.m., JUN YUN ZHANG, using **TARGET PHONE 2**, received an incoming call (Call #198) from an unknown Fuzhou Chinese speaking female. During this conversation, the unknown female advised that an unidentified individual had arrived and was staying at a hotel. Additionally, JUN YUN ZHANG stated, "Let him/her sleep, take the picture tonight, then go out tomorrow to do it." Affiant believes this call was in reference to the fact that a customer ("CUSTOMER GG"), who was seeking fraudulent documents, had arrived in Chicago and that JUN YUN ZHANG was instructing the unknown female to have CUSTOMER GG obtain a passport photograph in order for an altered PRC passport to be prepared.

189. On September 17, 2008, at approximately 3:20 p.m., JUN YUN ZHANG, using **TARGET PHONE 1**, placed an outgoing call (Call #594) to JUN YUE ZHANG. During this conversation, JUN YUN ZHANG stated, "I have a customer, need something done," at which time, JUN YUE ZHANG stated, "Wait until tonight." Affiant believes this call was in reference to JUN YUN ZHANG seeking the assistance of JUE YUE ZHANG to prepare and supply fraudulent identification documents to a customer, possibly CUSTOMER GG.

190. On September 17, 2008, at approximately 3:59 p.m., JUN YUN ZHANG using **TARGET PHONE 2**, placed a call to an unknown female (Call #205). During this conversation, JUN YUN ZHANG and the unknown female discussed the location and total number of "cards

(social security account cards)" remaining. JUN YUN ZHANG asked the unknown female to help JUN YUN ZHANG find some of the cards and JUN YUN ZHANG stated that JUN YUN ZHANG had, "[O]ver one hundred cards" (believed to be a reference to over one hundred social security account cards). The unknown female stated that, "One card got lost in a fight at the Department of Transportation" when someone, who was trying to use the card, got scared and ran away. It is believed that this conversation is related to a customer, who was utilizing a fraudulent passport and social security card at an ISOS Driver Services Facility, fleeing the facility due to being questioned about his or her identification documents.

191. On September 17, 2008, at approximately 4:43 p.m., JUN YUN ZHANG, using **TARGET PHONE 2**, received an incoming call (Call #211) from an unknown Fuzhou Chinese speaking female. During this conversation, JUN YUN ZHANG advised the unknown female to bring the picture to Chinatown and to call (312)404-8099.<sup>125</sup> Based upon subscriber information and voice comparison, JUN YUE ZHANG is known to utilize telephone number (312)404-8099. Affiant believes that this call was in reference to JUN YUN ZHANG instructing the unknown female to bring a passport photograph to JUN YUE ZHANG so that JUN YUE ZHANG could assist the unknown female with obtaining an altered PRC passport and other fraudulent identification documents.

192. On September 17, 2008, at approximately 4:44 p.m., JUN YUN ZHANG, using **TARGET PHONE 1**, placed an outgoing call (Call #601) to JUN YUE ZHANG. During this conversation, JUN YUN ZHANG stated, "Later there will be a customer. Take the picture and give

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<sup>125</sup> Subpoenaed records indicated that telephone number (312)404-8099 was subscribed to by JUN YUE ZHANG with an address of 239 West 24th Street, Chicago, Illinois.

it to the Hong Kong lady (MANUFACTURER A) to do it (alter a PRC passport) for me." Further, JUN YUN ZHANG advised that the customer would call JUN YUE ZHANG later. Additionally, JUN YUN ZHANG advised JUN YUE ZHANG to collect \$1,500 from the customer and that JUN YUN ZHANG would pay JUN YUE ZHANG \$500 for JUN YUE ZHANG's efforts. Thereafter, JUN YUE ZHANG agreed to JUN YUN ZHANG's request.

193. On September 18, 2008, at approximately 10:28 a.m., JUN YUN ZHANG, using **TARGET PHONE 1**, placed an outgoing call (Call #634) to JUN YUE ZHANG. During this conversation, JUN YUE ZHANG asked, "Did you (JUN YUN ZHANG) call to have someone take them (customers) over (to a ISOS Driver Services Facility) and JUN YUN ZHANG replied, affirmatively. Further, JUN YUN ZHANG asked, "You, do you want the money to be collect in advance or not?" and JUN YUE ZHANG replied, "Either way."

194. On September 21, 2008, at approximately 9:49 p.m., JUN YUN ZHANG, utilizing **TARGET PHONE 1**, received an incoming call from TIANSHENG ZHANG. During this conversation JUN YUN ZHANG and TIANSHENG ZHANG discussed that "LAO SAN" (JUN YUE ZHANG) had a "few documents (passports and social security account cards)" confiscated at "42" and that "He (a customer)" got afraid and ran away. TIANSHENG ZHANG asked JUN YUN ZHANG about the condition of "147" (believed to be a reference to the Orland Park Facility located at 14700 South Ravina Avenue, Orland Park, Illinois) and JUN YUN ZHANG replied that TIANSHENG ZHANG could still get in (obtain Illinois driver's license or identification cards) at "147." Also during this conversation, TIANSHENG ZHANG commented that TIANSHENG ZHANG received a complaint that TIANSHENG ZHANG and JUN YUN ZHANG were charging older age people from "2,300 to 2,500 (\$2,300 to \$2,500 for an identity set)", yet there were

competitors who were only charging "1,500 to 1,600 (\$1,500 to \$1,600)." JUN YUN ZHANG replied that JUN YUN ZHANG had been doing "this business" for a long time and it had been this way (higher price for older customers) since then.

**DD. September 24, 2008: CUSTOMER HH Obtained Illinois Identification Card Through Assistance of QIONG ZHOU, JUN YUN ZHANG, and JUN XI ZHANG.**

195. On September 21, 2008, JUN YUN ZHANG, utilizing **TARGET PHONE 1**, received an incoming call (Call #744) from QIONG ZHOU.<sup>126</sup> During this conversation, QIONG ZHOU advised JUN YUN ZHANG that a female ("CUSTOMER HH") wanted to just buy a license, at which time, JUN YUN ZHANG advised that he would teach CUSTOMER HH how to drive and would charge CUSTOMER HH \$600. QIONG ZHOU stated that CUSTOMER HH could ride in the delivery company's truck to Chicago and asked JUN YUN ZHANG to be "on call."<sup>127</sup> Later in the conversation, QIONG ZHOU gave the telephone to CUSTOMER HH and JUN YUN ZHANG asked what driving experience CUSTOMER HH had. CUSTOMER HH indicated that CUSTOMER HH's driving experience was not good and asked, "I don't even drive, can I buy one license?" JUN YUN ZHANG replied, "You can't buy one now" (believed to be a reference to JUN YUN ZHANG's current inability to bribe an ISOS Public Service Representative to forgo the ISOS Vehicle Road Test.)

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<sup>126</sup> Based upon physical surveillance conducted during the course of this investigation, subscriber information for various telephones utilized by QIONG ZHOU and the content and context of interceptions between QIONG ZHOU and JUN YUN ZHANG, it is believed that JUN YUN ZHANG's girlfriend, QIONG ZHOU, was the individual calling JUN YUN ZHANG.

<sup>127</sup> Based upon other intercepted conversations, subscriber information, and physical surveillance, it is believed that QIONG ZHOU moved from Chicago, Illinois to Mt. Pleasant, Michigan in September 2008. Further, based upon the content of the conversation, it is believed that CUSTOMER HH was also in Michigan at the time of this call.

196. On September 23, 2008, JUN YUN ZHANG, utilizing **TARGET PHONE 1**, received an incoming call (Call #759) from QIONG ZHOU. During this conversation, QIONG ZHOU advised that CUSTOMER HH must have it (driver's license) in one day and further stated, "She (CUSTOMER HH) wants to get it even though she does not drive well. She wants it no matter what" and further advised that CUSTOMER HH would be traveling to Chicago on September 24, 2008. QIONG ZHOU briefly provided the telephone to CUSTOMER HH to confirm that JUN YUN ZHANG would assist CUSTOMER HH with obtaining a driver's license, at which time, JUN YUN ZHANG agreed. QIONG ZHOU then obtained the telephone and instructed, "Take her (CUSTOMER HH) to do it in person. I say take her to do it yourself." QIONG ZHOU then asked, "[H]ow many people (customers) are you taking" and JUN YUN ZHANG replied, "Just one." QIONG ZHOU further stated, "You did not lose the card, did you?" and JUN YUN ZHANG replied, "No." It is believed that this may have been a reference to the social security account card which would be utilized by CUSTOMER HH to obtain a driver's license.

197. On September 24, 2008, at approximately 9:28 a.m., law enforcement officers conducting surveillance in the Chicago Chinatown community observed JUN YUN ZHANG, driving Toyota Camry[8], in the vicinity of 2600 South Wentworth Avenue, Chicago, Illinois. At this location, JUN YUN ZHANG met with an unknown male who was driving a Lexus, bearing Michigan license plate, 1FLM38.<sup>128</sup> Shortly thereafter an Asian female, believed to be CUSTOMER HH, based upon intercepted calls, exited the Lexus and entered the backseat of JUN YUN ZHANG's vehicle.

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<sup>128</sup> A query of Michigan vehicle registration records revealed that license plate 1FLM38 was registered INDIVIDUAL 18 with an address of 1001 Brookside Drive, Apartment 202, Lansing, Michigan.

198. At approximately 9:30 a.m., JUN YUN ZHANG, utilizing **TARGET PHONE 1**, placed a call (Call #816) to (312)714-8215<sup>129</sup> and spoke with an unknown male, who was later identified as JUN XI ZHANG based upon physical surveillance as detailed hereinafter. During this conversation, JUN YUN ZHANG stated that he was driving over for the "Test" (answer sheet to the ISOS Driver's License Written Examination) and a "letter" (postmarked envelope used to show residency). Meanwhile, law enforcement surveilled JUN YUN ZHANG drive and park in the vicinity of 2914 South Elias Court, Chicago, Illinois. At approximately 9:36 a.m., JUN YUN ZHANG, utilizing **TARGET PHONE 1**, placed a call (Call #817) to JUN XI ZHANG and stated, "I am in front of your door." Approximately five minutes later, JUN XI ZHANG was observed exiting 2909 South Elias Court, Chicago, Illinois, and approaching the driver's side window of JUN YUN ZHANG's vehicle. At that time, JUN XI ZHANG handed a small paper item to JUN YUN ZHANG, who remained seated in JUN YUN ZHANG's vehicle. JUN XI ZHANG then walked and retrieved a large atlas from the previously identified Toyota Rav4, registered to JUN XI ZHANG, which was parked in the vicinity. JUN XI ZHANG then approached JUN YUN ZHANG again and removed a large paper document from inside the atlas and then provided the document to JUN YUN ZHANG. Based upon other intercepted conversations involving JUN YUN ZHANG, it is believed that this criminal enterprise utilizes magazines and books to hide fraudulent documents. Based upon the referenced intercepted call and observations made during surveillance, it is believed that JUN XI ZHANG provided JUN YUN ZHANG with a proof of residency and an answer sheet to the ISOS Driver's License Written Examination for use by CUSTOMER HH.

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<sup>129</sup> Telephone records show that telephone number (312)714-8215 was subscribed to by ZHAOFA WANG with an address of 2336 South Wentworth Avenue, Chicago, Illinois.

199. Under continuous surveillance, JUN YUN ZHANG, with CUSTOMER HH as a passenger, drove to a Chinese bakery and at approximately 10:08 a.m., parked behind 260 West 24th Place, Unit 1 Rear, Chicago, Illinois, which is a residence known to be utilized by JUN YUE ZHANG based upon previous surveillance. Thereafter, JUN YUN ZHANG approached the backdoor of JUN YUE ZHANG's residence with a small piece of paper in JUN YUN ZHANG's hand. Law enforcement observed JUN YUE ZHANG open the door and JUN YUN ZHANG enter the residence. Several minutes later, JUN YUN ZHANG exited JUN YUE ZHANG's residence and departed with CUSTOMER HH at approximately 10:16 a.m. Thereafter, JUN YUN ZHANG and CUSTOMER HH were surveilled driving to and entering the State Farm Insurance Agency, located at 233 West Cermak Road, Chicago, Illinois and then returning to JUN YUE ZHANG's residence at approximately 10:47 a.m.

200. For approximately the next forty-five minutes, JUN YUN ZHANG entered and exited JUN YUE ZHANG's residence on three occasions, returning to JUN YUN ZHANG's vehicle each time. It is believed that while waiting in JUN YUN ZHANG's vehicle, JUN YUN ZHANG was instructing CUSTOMER HH in regards to the memorization scheme utilized to pass the ISOS Driver's License Written Examination. More specifically, during this time period, at approximately 11:00 a.m., JUN YUN ZHANG, utilizing **TARGET PHONE 1**, placed a call (Call #824) to JUN XI ZHANG. During this conversation, JUN YUN ZHANG sought help from JUN XI ZHANG related to the memorization scheme utilized to pass the ISOS written examination. For instance, JUN YUN ZHANG asked, "Is it R-E with 16 words" and JUN XI ZHANG replied, "Correct." Further, JUN YUN ZHANG asked, "There is nothing with 16. Correct? What do I fill in those three spaces with underline with no 16 words? What about the one with 15 words?" JUN XI ZHANG

responded, "Don't worry about it. Just look for words begin with R-E in the 16 words." Further, JUN YUN ZHANG stated, "There is no 16 words, R-E, none, just put into 16 words, right?" and JUN XI ZHANG replied, "The first one is the train track with the round alarm thing. Correct. R-E, R-A, 15."

201. At approximately 11:38 a.m., JUN YUN ZHANG departed the vicinity of JUN YUE ZHANG's residence, with CUSTOMER HH as a passenger, and was surveilled driving to the vicinity of the Midlothian Facility. For the next several hours, JUN YUN ZHANG provided driving instruction to CUSTOMER HH who utilized JUN YUN ZHANG's vehicle. During the course of the surveillance, CUSTOMER HH was also observed entering and exiting the Midlothian Facility several times. CUSTOMER HH was also observed taking the ISOS Vehicle Road Test in JUN YUN ZHANG's vehicle. Pursuant to information provided by ISOS and a review of surveillance photographs of CUSTOMER HH, it was determined that on September 24, 2008, CUSTOMER HH obtained an Illinois identification card, passed the ISOS Driver's License Examination, but failed the ISOS vehicle road test.

202. On September 24, 2008, at approximately 8:34 p.m., JUN YUN ZHANG, utilizing **TARGET PHONE 1**, received an incoming call (Call #899) from QIONG ZHOU. During this conversation, QIONG ZHOU complained about CUSTOMER HH failing the driving test, at which time, JUN YUN ZHANG stated, "Don't know how to drive, expect to pass?" Thereafter, QIONG ZHOU replied, "Can not buy with money?" (believed to be a reference to making a bribe payment to an ISOS Public Service Representative) and JUN YUN ZHANG stated, "There is a very nice DMV tester waiting for her (CUSTOMER HH) to take the test. She is not even able to make a turn." Also during this conversation, JUN YUN ZHANG stated, "Did not bring the document, social

security card and passport. What can they do?" and further stated, "Then I find a way to get it" (believed to be a reference to obtaining a social security account card and altering a PRC passport to match the identity of the social security account card). Subsequently, QIONG ZHOU asked, "You do it for her?" and JUN YUN ZHANG replied, "Yes." Based upon intercepted conversations and physical surveillance, it is believed that JUN YUN ZHANG coordinated with JUN YUE ZHANG to have an altered PRC passport manufactured for CUSTOMER HH.

203. On September 25, 2008, law enforcement officers surveilled JUN YUN ZHANG transport CUSTOMER HH to the Midlothian Facility, at which time, CUSTOMER HH was observed taking the ISOS Vehicle Road Test again. Based upon information provided by ISOS, CUSTOMER HH failed this ISOS Vehicle Road Test.

204. Additionally, on September 25, 2008, at approximately 3:26 p.m., JUN YUN ZHANG, utilizing **TARGET PHONE 1**, received an incoming call (Call #980) from JUN XI ZHANG. During this conversation, JUN XI ZHANG asked, "You, where is the written test," at which time, JUN YUN ZHANG replied, "In my car, at home, at home." JUN XI ZHANG stated, "Oh, when will you be able to bring it over? I need it tomorrow morning" and JUN YUN ZHANG advised that JUN YUN ZHANG would bring the test over later. Based upon the intercepted conversations and physical surveillance conducted on September 24, 2008, it is believed that JUN XI ZHANG was referring to the answer sheet that JUN XI ZHANG had provided to JUN YUN ZHANG in order to assist CUSTOMER HH.

**EE. September 3 - October 28, 2008: Wire Interceptions Involving JUN YUN ZHANG, TIANSHENG ZHANG, JUN XI ZHANG, QIONG ZHOU and JUN YUE ZHANG, and JUN SHUN ZHANG**

205. A review of CPD records revealed that on August 30, 2008, CPD officers responded to an incident in which an individual ("VICTIM B") reported having been stabbed by JUN SHUN ZHANG at 219 West 23rd Street, Chicago, Illinois.<sup>130</sup> Specifically, VICTIM B advised responding officers that VICTIM B knew JUN SHUN ZHANG to be a driving instructor and that VICTIM B had a verbal argument with JUN SHUN ZHANG regarding VICTIM B's refusal to pay \$1,000 to JUN SHUN ZHANG for an unspecified reason. Further, VICTIM B stated that during the argument, JUN SHUN ZHANG stabbed VICTIM B with a car key which resulted in a shallow stab wound in VICTIM B's chest. VICTIM B advised that after stabbing VICTIM B, JUN SHUN ZHANG fled the area. After being interviewed by officers, VICTIM B was transported to a local hospital for medical treatment. This investigation was ultimately closed by CPD due numerous unsuccessful attempts to contact or locate VICTIM B following the incident.

206. On September 3, 2008, at approximately 7:45 p.m., JUN YUN ZHANG, utilizing **TARGET PHONE 2**, placed a call (Call #19) to an individual believed to be JUN SHUN ZHANG based upon the context of the conversation. More specifically, during this conversation, JUN SHUN ZHANG stated that someone (a customer) came from New York to do "the stuff" (obtain fraudulent personal identification documents), but was unable to pay and had lied about being able to drive. JUN SHUN ZHANG further stated that JUN SHUN ZHANG pierced a key into the individual's (believed to be VICTIM B) chest, who was then taken for medical treatment. Further, JUN SHUN

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<sup>130</sup> Based upon information provided by CS-1 and physical surveillance, this location is believed to be a gambling parlor which has been operated, at times, by JUN YUN ZHANG.

ZHANG stated that the individual got the police involved. JUN YUN ZHANG asked if the individual had been referred by "Little Brother" and JUN SHUN ZHANG replied, "No." JUN SHUN ZHANG then stated, "I will temporarily stop the license thing" and JUN YUN ZHANG stated, "Stop for now, it's almost toward the end, let others take the blame." Affiant believes this conversation relates to the above referenced stabbing incident on August 30, 2008, and that VICTIM B was a customer who had failed the ISOS Vehicle Road Test and was therefore refusing to pay \$1,000 to JUN SHUN ZHANG, who had been assisting VICTIM B through the process.

207. On September 26, 2008, at approximately 11:57 a.m., JUN YUN ZHANG, utilizing **TARGET PHONE 2**, placed an outgoing call (Call #332) to TIANSHENG ZHANG. During this conversation, TIANSHENG ZHANG stated that TIANSHENG ZHANG had, "5750 after calculating." Further, JUN YUN ZHANG advised that he wanted to check TIANSHENG ZHANG's calculation to insure the number was correct. Affiant believes that this conversation may be related to a sum of cash (\$5750.00), derived from the sale of fraudulent personal identification documents.

208. On September 26, 2008, at approximately 7:53 p.m., JUN YUN ZHANG, utilizing **TARGET PHONE 2**, received an incoming call (Call #343) from JUN XI ZHANG. During this conversation, JUN XI ZHANG advised that JUN YUN ZHANG should just ignore the other person and JUN YUN ZHANG asked if the person was INDIVIDUAL 19's customer. JUN XI ZHANG confirmed that the person was INDIVIDUAL 19's customer and that when INDIVIDUAL 19 asked for \$150, the customer only paid \$70. JUN XI ZHANG further advised that everyone else paid in full except the one person.

209. On September 26, 2008, at approximately 8:10 p.m., JUN YUN ZHANG, utilizing **TARGET PHONE 2**, placed a call (Call #344) to JUN XI ZHANG. During this conversation, JUN

YUN ZHANG asked if the customer was able to drive properly and JUN XI ZHANG replied that the customer did not obey traffic laws, especially the red lights and stop signs. JUN YUN ZHANG then asked JUN XI ZHANG who JUN XI ZHANG would use the next day to take the test. JUN XI ZHANG replied that JUN XI ZHANG would use a Cantonese person that JUN YUN ZHANG may not know and that this Cantonese person was not associated with "LAO SAN" (JUN YUE ZHANG). JUN YUN ZHANG asked if the customer demanded a refund (presumably because the customer failed the ISOS Vehicle Road Test) and JUN XI ZHANG replied, "No." JUN YUN ZHANG advised JUN XI ZHANG to take care of the business otherwise there will be too many complaints. Further, JUN XI ZHANG advised that he would tell the Cantonese guy to collect the money (from the customer) as soon as this guy gets into the car. Affiant believes this conversation is regarding a customer of JUN XI ZHANG who failed the ISOS Vehicle Road Test. Consequently, JUN XI ZHANG planned on having an individual (the Cantonese guy) take the ISOS Vehicle Road Test for JUN XI ZHANG's customer. Based upon the investigation to date, Affiant is aware that this technique, sometimes referred to as "proxy testing" is sometimes utilized by this criminal enterprise in order to obtain driver's licenses for customers who cannot pass the ISOS Vehicle Road Test.

210. On September 26, 2008, at approximately 8:15 p.m., JUN YUN ZHANG, utilizing **TARGET PHONE 2**, placed a call (Call #346) to JUN XI ZHANG. During this conversation, JUN YUN ZHANG asked JUN XI ZHANG to take care of the customer, but JUN XI ZHANG stated that JUN XI ZHANG did not want to deal with the customer because the customer did not want to pay. JUN YUN ZHANG advised that the customer was referred by INDIVIDUAL 19 and that JUN XI ZHANG needed to be nice to the customer. Based upon this and other intercepted calls, Affiant believes that JUN YUN ZHANG was instructing JUN XI ZHANG to continue assisting the

customer with obtaining an Illinois driver's license or identification card so as to not compromise JUN YUN ZHANG's relationship with INDIVIDUAL 19 who referred the customer.

211. On October 4, 2008, at approximately 2:02 p.m., JUN YUN ZHANG, utilizing **TARGET PHONE 2**, received an incoming call (Call #438) from TIANSHENG ZHANG. During this conversation, JUN YUN ZHANG and TIANSHENG ZHANG discussed calculations and amounts that were owed. TIANSHENG ZHANG stated, "Just tell me the final amount, then I will go home and compare to my number." Later in the conversation, JUN YUN ZHANG stated, "Five people, \$1700, each person \$1800. Four of them \$1700. One for \$1400. One for \$350" (believed to be references to amounts owed by TIANSHENG ZHANG to JUN YUN ZHANG for providing various fraudulent documents). TIANSHENG ZHANG advised JUN YUN ZHANG that TIANSHENG ZHANG would be home next week and they could calculate the amount at that time.

212. On October 9, 2008, at approximately 5:01 p.m., QIONG ZHOU, utilizing **TARGET PHONE 1**, received an incoming call (Call #1276) from JUN YUN ZHANG. During this telephone call, QIONG ZHOU advised JUN YUN ZHANG that there was a female who called (**TARGET PHONE 1**) and said she needed to get an "ID." Further, QIONG ZHOU stated that the female was not able to get through to JUN YUN ZHANG on the "312" number (believed to be a reference to **TARGET PHONE 2**). JUN YUN ZHANG replied, "Oh."<sup>131</sup>

213. On October 10, 2008, at approximately 8:21 a.m., QIONG ZHOU, utilizing

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<sup>131</sup> Based upon intercepted calls, it is believed that after JUN YUN ZHANG assisted CUSTOMER HH, who was referred by QIONG ZHOU, obtain an Illinois identification card, CUSTOMER HH transported **TARGET PHONE 1** to QIONG ZHOU. Additionally, based upon intercepted calls, it was learned that QIONG ZHOU provided a new telephone to CUSTOMER HH in order for CUSTOMER HH to deliver this new telephone to JUN YUN ZHANG.

**TARGET PHONE 1**, placed an outgoing call (Call #1293) to an unknown male. During this telephone conversation, QIONG ZHOU and the unknown male discussed QIONG ZHOU's relationship with JUN YUN ZHANG. The unknown male asked, "Did you and him (JUN YUN ZHANG) have money in the bank?" and QIONG ZHOU responded, "Remnimbi (Chinese currency). Just a little. It is not too much for Remnimbi. Does one million (approximately \$142,000) sound a lot?" Further, QIONG ZHOU stated that because JUN YUN ZHANG trusted QIONG ZHOU, "He (JUN YUN ZHANG) keeps his money in my "place" (QIONG ZHOU's possession). I disconnect my phone and he (JUN YUN ZHANG) would have nothing." QIONG ZHOU stated, "He (JUN YUN ZHANG) has no status (immigration). Where is he to find a safe box? (safe place to store money)." Affiant believes that QIONG ZHOU's statement was referring to the fact that JUN YUN ZHANG was illegally residing in the U.S. and that JUN YUN ZHANG had no means in which to properly deposit proceeds derived from the fraudulent document operation.

214. On October 12, 2008, at approximately 8:46 a.m., QIONG ZHOU, utilizing **TARGET PHONE 1**, received an incoming call (Call #1335) from JUN YUN ZHANG. During this telephone call, QIONG ZHOU asked JUN YUN ZHANG about JUN YUN ZHANG's place on 23rd Street and about where JUN YUN ZHANG kept the computer. JUN YUN ZHANG replied that JUN YUN ZHANG was no longer renting the place on 23rd and that the computer was at "LAO SAN's" (JUN YUE ZHANG) place and was of no use to JUN YUN ZHANG right now. Affiant believes JUN YUN ZHANG was referring to the fact that JUN YUE ZHANG now possessed the computer which JUN YUN ZHANG formerly utilized to produce fraudulent documents and that since JUN YUN ZHANG was curtailing JUN YUN ZHANG's involvement, JUN YUN ZHANG had no use for the computer.

215. On October 13, 2008, at approximately 11:30 p.m., QIONG ZHOU, utilizing **TARGET PHONE 1**, received an incoming call (Call #1439) from JUN YUE ZHANG, who identified himself as "LAO SAN." During this conversation, JUN YUE ZHANG was attempting to locate JUN YUN ZHANG. At that time, it is believed that QIONG ZHOU initiated a three-way telephone conversation by calling JUN YUN ZHANG. Thereafter, JUN YUE ZHANG asked JUN YUN ZHANG for "Jun Shun's" (believed to be a reference to JUN SHUN ZHANG) telephone number and stated, "He (JUN SHUN ZHANG) knows where to get the fake, go over and buy two books/cards. Use it to activate phone." JUN YUN ZHANG clarified, "What kind of fake?", at which time, JUN YUE ZHANG replied, "Driver's license." JUN YUN ZHANG questioned, "Only need an ID to activate (telephone)?" and JUN YUE ZHANG replied, "ID, social security card, the social security card that other people use to get insurance, the customer in the past that got insurance, the picture is still at my place" (believed to be a reference to JUN YUE ZHANG being in possession of additional personal identification documents which could be utilized in conjunction with a fake driver's license. At the conclusion of the conversation, JUN YUN ZHANG agreed to take JUN YUE ZHANG to the referenced place tomorrow.

216. On October 19, 2008, at approximately 11:31 p.m., QIONG ZHOU, utilizing **TARGET PHONE 1**, placed a call (Call #1699) to an unknown female. During this conversation, QIONG ZHOU stated that the "northern woman" was with LAO SZE (JUN YUN ZHANG) for eight years and that northern woman had a lot of customers who wanted "IDs." Further, QIONG ZHOU stated that the northern woman made all the money herself and spent almost \$500,000 on a house. Additionally, QIONG ZHOU stated that the "social security cards" bought by "LAO SZE" (JUN YUN ZHANG) were sold by the northern woman's friends. Based upon the content and context of

the conversation and other investigation, it is believed that "northern woman" may be a reference to CO-CONSPIRATOR A.

217. On October 20, 2008, at approximately 10:37 a.m., QIONG ZHOU, utilizing **TARGET PHONE 1**, placed an outgoing call (Call #1764) to JUN YUN ZHANG. During this conversation, QIONG ZHOU received an incoming telephone call from an unknown male who wanted to speak with JUN YUN ZHANG. Thereafter, QIONG ZHOU initiated a three-way telephone conversation between QIONG ZHOU, JUN YUN ZHANG and an unknown male, at which time, the unknown male asked if JUN YUN ZHANG could assist with the "whole package" for three customers, to include one that was 26 years old and further wanted to confirm a price of \$1,500 (per customer). JUN YUN ZHANG stated, "Twenty-six years old. I need to check tomorrow to see if there is any left"(believed to be reference to social security account cards) and advised that JUN YUN ZHANG would call the unknown male tomorrow. Upon the unknown male hanging up, QIONG ZHOU stated to JUN YUN ZHANG, "Go do business (providing fraudulent documents) with one or two customers instead of gambling all day" and further stated that many people had called who wanted "IDs."

**FF. Additional Information Relative to MEIZHU WANG**

218. On September 12, 2008, at approximately 1:39 p.m., JUN YUN ZHANG, utilizing **TARGET PHONE 1**, placed an outgoing call (Call #147) to MEIZHU WANG.<sup>132</sup> During this

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<sup>132</sup> In relation to this intercepted call, MEIZHU WANG was identified, in part, as a result of MEIZHU WANG identifying herself during the conversation as "MEIZHU." Furthermore, the telephone number called by JUN YUN ZHANG was (917)667-1282, which is subscribed to by INDIVIDUAL 16 with an address of 2227 South Wentworth Avenue, Chicago, Illinois. This subscriber information is identical to the subscriber information for telephone number (917)667-2808, which, as previously set forth in this Affidavit, has been shown to be utilized by MEIZHU WANG's brother and broker, XIN LI WANG. It should be noted that 2227 South Wentworth Avenue is the location of a Chinese employment agency, among other businesses, which is

conversation, MEIZHU WANG stated that MEIZHU WANG brought a customer who had a card (social security account card), but no passport to an unspecified individual and the unspecified individual refused to make a copy of the passport for the customer which the customer had requested. MEIZHU WANG stated MEIZHU WANG then went to INDIVIDUAL 21 and "got it done" (believed to be a reference to obtaining fraudulent documents). JUN YUN ZHANG advised that INDIVIDUAL 20 was the person "behind" individual INDIVIDUAL 21. MEIZHU WANG also complained about INDIVIDUAL 22 because MEIZHU WANG was told that INDIVIDUAL 22's computer got a virus and therefore could not do "it" (manufacture an altered PRC passport) for MEIZHU WANG. Further, MEIZHU WANG stated that INDIVIDUAL 22 charged for the written test (to provide an answer sheet for the ISOS Driver's License Written Examination) and therefore MEIZHU WANG got mad with INDIVIDUAL 22 and refused to do further business (obtain fraudulent documents) with INDIVIDUAL 22. JUN YUN ZHANG stated that he referred MEIZHU WANG to INDIVIDUAL 20 because JUN YUN ZHANG felt the business (fraudulent document business) was becoming less profitable. JUN YUN ZHANG advised that he used to make \$2,000 for each customer, but now the price has been pushed down. Also during this conversation, JUN YUN ZHANG stated that he had a controversy with INDIVIDUAL H,<sup>133</sup> regarding money. MEIZHU WANG stated that on one occasion, MEIZHU WANG picked-up a customer by mistake (customer seeking fraudulent documents) and that INDIVIDUAL H had collected money from the customer and told the "black guy" not to help MEIZHU WANG. It is believed that MEIZHU WANG's statement was referring to INDIVIDUAL H telling a corrupt ISOS Public Service

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known to be operated by JUN YUN ZHANG's sister.

<sup>133</sup> Based on CS-1 and ICE records, INDIVIDUAL H is a brother of JUN YUN ZHANG.

Representative ("black guy") not to accept money from MEIZHU WANG in order to allow MEIZHU WANG's customers to forgo the ISOS Vehicle Road Test. MEIZHU WANG stated that she told INDIVIDUAL H, "I, MEIZHU, never steal customer from other people."

219. In addition to being a fraudulent document broker, it is believed that, at times, MEIZHU WANG was involved in obtaining counterfeit PRC passports. More specifically, based upon information obtained from ICE, Affiant learned that on April 21, 2005, United States Customs and Border Protection ("CBP") Officers stationed at the San Francisco International Mail Facility inspected a parcel from the PRC, shipped via mailing company EMS. Upon examination by a CBP Officer, it was determined that this parcel contained approximately ten blank PRC passports and approximately 106 laminate covers, which are utilized to laminate over the biographical page and passport holder's photograph. These laminate covers had multi-colored flowers which are consistent with the appearance of authentic laminate covers. Further, based upon the CBP Officer's training, it was determined that the passports were counterfeit due to the fact that the passport number was not "letter-pressed" or raised, the watermark on the paper was not created during the papermaking process, and the stitching used in the passports was done with a single white color thread and not with the usual multiple threads with different colors. A review of the parcel label revealed that the parcel was destined to "Wang Meizhu" (MEIZHU WANG) at "3043 S. Archr [sic], Chicago, Illinois 60608." Based upon a review of ISOS records and other investigation, 3043 South Archer Avenue is an address known to have been utilized by MEIZHU WANG and JUN YUN ZHANG. On or about April 27, 2005, law enforcement officers from ICE and the U.S. Postal Inspection Service conducted a controlled delivery of the parcel to 3043 South Archer, Chicago, Illinois. In conjunction with this controlled delivery, JUN YUN ZHANG and MEIZHU WANG were located

and at 3043 South Archer Avenue, along with numerous other Chinese individuals. Affiant has been advised by ICE that based upon further investigation, it was determined that several of the Chinese individuals at that location had traveled from New York in order to obtain Illinois driver's licenses.

**GG. December 30, 2008: UCO-2 Purchased Fraudulent Identification Documents from YONGHUI WANG and ZHAOFA WANG**

220. On October 14, 2008, at approximately 11:39 a.m., QIONG ZHOU, utilizing **TARGET PHONE 1**, received an incoming call from telephone number (630)747-0865.<sup>134</sup> During this telephone call an unknown male told QIONG ZHOU to call "4th uncle" because the unknown male was looking for "4th uncle." Affiant is aware that JUN YUN ZHANG is the fourth sibling in JUN YUN ZHANG's family and uses the moniker "LAO SZE," meaning brother number four.

221. In November of 2008, law enforcement observed an advertisement in Edition 332 of the Indonesian language newspaper, Kabarkilat, which can be accessed on the Internet via [www.kabarkilat.com](http://www.kabarkilat.com). This advertisement was preliminarily translated as, "Authentic Chicago driver license & ID card, we provide assistance in acquiring Chicago 5 yr. driver license, 6yr. ID card, without the need of possessing (any) document!, (we) Provide insurance, title, free transportation from airports and bus stations, 630-747-0865, Michael Wang Manager." It should be noted that law enforcement has observed similar advertisements, with telephone number (630)747-0865, in the World Journal during 2008.

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<sup>134</sup> Investigation revealed that telephone number (630)747-0865 is subscribed to by INDIVIDUAL 24 with an address of 239 West 24th Street, Chicago, Illinois. It should be noted that 239 West 24th Street is the subscriber address for a telephone number (312)545-7794, which is utilized by JUN YUE ZHANG, and is the registered address for the previously described Toyota Rav4, known to be utilized by JUN XI ZHANG. Further, based upon observation, CS-1 has advised law enforcement that 239 West 24th Street is a "flop house" operated by JUN YUN ZHANG's sister.

222. On December 22, 2008, at approximately 3:38 p.m., UCO-2 called telephone number (630)747-0865 and conducted a consensually recorded telephone call with a Mandarin Chinese speaking male, who was identified himself as "Mr. Chen." Based upon subsequent investigation, which is detailed hereinafter, this individual was later identified as YONGHUI WANG.<sup>135</sup> Based upon a review of the recorded conversation, UCO-2 stated, "Eh, eh, I was given your telephone number by a friend for driver's license," and further stated, "What kind of documents do I need?" YONGHUI WANG replied, "Need social security card and passport," and further advised, "If you don't have, you have to do it by changing your name." Additionally, YONGHUI WANG stated that the social security card, "Can be used for everything, opening a credit card or a bank account, all will do." YONGHUI WANG agreed to help UCO-2 obtain a driver's license and advised that the price would be \$1,300 plus an additional \$500 if UCO-2 wanted to keep the passport.

223. On December 29, 2008, at approximately 10:45 a.m., UCO-2 placed a call and conducted a consensually recorded telephone call with YONGHUI WANG. Based upon a review of the recorded conversation, UCO-2 asked if YONGHUI WANG could assist UCO-2 with obtaining a driver's license on December 30, 2008, at which time, YONGHUI WANG replied affirmatively and asked the age of UCO-2. UCO-2 advised that UCO-2 was 35 years old and YONGHUI WANG advised that the price, without buying the passport, went up to \$1,500. YONGHUI WANG advised that the, "Price can go up or down very fast (based upon availability of the social security account cards). UCO-2 and YONGHUI WANG then discussed arrangements to meet on the following day.

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<sup>135</sup> During all consensually recorded telephone conversations between UCO-2 and YONGHUI WANG, which are referenced in this Affidavit, YONGHUI WANG utilized telephone number (630)747-0865.

224. On December 30, 2008, UCO-2 was equipped with an audio/video recording device, a transmitter and was provided with \$2,000 in pre-recorded funds as well as a passport photograph of UCO-2. At approximately 8:35 a.m., law enforcement initiated surveillance in the vicinity of 2100 South Archer Avenue, Chicago, Illinois, at which time, UCO-2 was covertly transported to the same location. At approximately 8:38 a.m., UCO-2 placed a call and conducted a consensually recorded conversation with YONGHUI WANG, in order to provide UCO-2's location to YONGHUI WANG. At approximately 8:55 a.m., a silver Honda Accord, bearing Illinois license plate X459600 ("Honda Accord[2]"),<sup>136</sup> parked in the vicinity of UCO-2, at which time, UCO-2 received an incoming telephone call from telephone number (630)747-0865, as confirmed by a review of UCO-2's telephone's caller identification feature. Upon attempting to answer this telephone call, UCO-2 observed the male driver<sup>137</sup> of Honda Accord[2] motion for UCO-2 to enter the vehicle. Thereafter, UCO-2 entered the vehicle which then departed. While in the vehicle, YONGHUI WANG requested UCO-2's passport photograph, at which time, UCO-2 handed UCO-2's passport photograph to YONGHUI WANG. A review of the recorded conversation revealed that YONGHUI

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<sup>136</sup> A review of ISOS vehicle registration records revealed that license plate X459600 was registered to an individual believed to be INDIVIDUAL 25, but includes a minor misspelling of INDIVIDUAL 25's name, with an address of 215 West Cermak Road, Chicago, Illinois. Based upon a review of additional ISOS records, it is known that INDIVIDUAL 25, has an Illinois driver's license with the address of 215 West Cermak Road, Chicago, Illinois. Consequently, Affiant believes that the vehicle registration for X459600 may be a typographical error. Further, based upon a review of ISOS records, a review of video and photographs obtained from various ISOS Driver Service's Facilities during the course of the investigation and telephone record analysis, it is believed that INDIVIDUAL 25 is a broker.

<sup>137</sup> Later on December 30, 2008, CPD officers stopped the driver of Honda Accord[2] for committing a traffic offense. Pursuant to this vehicle stop, the unknown male produced an Illinois driver's license and identified himself as YONGHUI WANG. The address listed on this driver's license was 239 West 24th Street, Chicago, Illinois.

WANG stated, "You also want the passport?", at which time UCO-2 replied affirmatively. YONGHUI WANG then stated, "There will be an additional five hundred dollars for the passport." Additionally, UCO-2 questioned about the increasing cost of the identity set that UCO-2 was purchasing, specifically, UCO-2 stated, "Gone up by two hundred dollars, just like that." YONGHUI WANG replied, in part, "[I]t is because the things we buy (social security account cards) got expensive." Affiant believes this statement was referencing the fact that differences wholesale prices for social security account cards frequently fluctuate due to varying supply and demand constraints. Further, UCO-2 stated, "Ah, that work card number (social security account number) has no problems right?" and YONGHUI WANG stated, "Not a problem, whatsoever."

225. At approximately 8:59 a.m., YONGHUI WANG dropped-off UCO-2 at the Tasty Place Bakery and Café located at 2339A South Wentworth Avenue, Chicago, Illinois and advised UCO-2, "I'll come pick you up in a while after I'm done." UCO-2 understood, "[a]fter I'm done" to be a reference to YONGHUI WANG having an altered PRC passport manufactured for UCO-2. Thereafter, Honda Accord[2] was surveilled driving to the 2900 block of South Wells Street, Chicago, Illinois. Upon parking, YONGHUI WANG exited and began conversing with an Asian male ("CUSTOMER II") who was standing in front of a residence located at 2925 South Wells Street. Thereafter, YONGHUI WANG and CUSTOMER II entered 2925 South Wells Street. At approximately 9:34 a.m., UCO-2 received an incoming telephone call from YONGHUI WANG, at which time, YONGHUI WANG advised UCO-2 to write down and memorize a series of numbers and letters which corresponded to the answers on the written driver's license examination. YONGHUI WANG then advised that another individual would come and pick-up UCO-2 in order to process the driver's license.

226. At approximately 9:50 a.m., YONGHUI WANG called UCO-2 and advised that an individual driving a Nissan would be outside the restaurant to pick-up UCO-2. At approximately 9:52 a.m., an unknown male driving a Nissan Xterra, bearing Michigan license plate BYT2833,<sup>138</sup> was observed double parking in the vicinity of 2925 South Wells Street.<sup>139</sup> Thereafter, CUSTOMER II exited 2925 South Wells Street and departed in the Nissan Xterra.

227. At approximately 9:57 a.m., law enforcement observed the Nissan Xterra park in the vicinity of Tasty Place Bakery and Café, at which time, UCO-2 observed that ZHAOFA WANG and CUSTOMER II appeared to be looking for someone. Thereafter, UCO-2 approached the Nissan Xterra and asked ZHAOFA WANG, if "Mr. Chen"(YONGHUI WANG) had sent ZHAOFA WANG for the driver's license and ZHAOFA WANG acknowledged affirmatively. UCO-2 then entered the Nissan Xterra, which subsequently departed. While in the Nissan Xterra, CUSTOMER II handed UCO-2 a social security account card, listing an account number with the prefix "586", a name-matched PRC passport bearing a picture of UCO-2 and a T-Mobile phone bill.<sup>140</sup> For approximately the next thirty minutes, the Nissan Xterra was surveilled driving to the Midlothian Facility. While in transit, CUSTOMER II and ZHAOFA WANG provided extensive instruction to UCO-2 relative to entering the Midlothian Facility as well as taking the ISOS Driver's license

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<sup>138</sup> A review of Michigan vehicle registration records revealed license plate BYT2833 was registered to INDIVIDUAL 26 with an address of 2476 Heights Ravenna Road, Muskegon, Michigan.

<sup>139</sup> Later on December 30, 2008, CPD officers stopped the driver of the Nissan Xterra for committing a traffic offense. Pursuant to this vehicle stop, the unknown male produced an Illinois driver's license and identified himself as ZHAOFA WANG. As previously indicated, ZHAOFA WANG is the subscriber of the telephone number (312)714-8125, which is utilized by JUN XI ZHANG.

<sup>140</sup> Based upon a preliminary examination, the T-Mobile phone bill appears fraudulent based upon appearance and the account numbers listed.

Written Examination. A review of the recorded conversation revealed that ZHAOFA WANG stated, "Go inside, stand in line and say to ID and permit" and further advised UCO-2 to memorize, "What year your birth date was, your name." Further, ZHAOFA WANG stated, "You know how to do this code?", a reference to the memorization scheme utilized to pass the ISOS Driver's License Written Examination. Thereafter, ZHAOFA WANG and CUSTOMER II explained the "code" to UCO-2. Also during this conversation, ZHAOFA WANG stated, "We collect money first (fee for the identity set), then if we, if later you don't pass, we'll return you the money," at which time, UCO-2 argued that UCO-2 did not want to pay all the money prior to obtaining an identification card. ZHAOFA WANG replied, "We stress our reputation" and, "Not having done only a day or two". UCO-2 understood ZHAOFA WANG's statement to mean that ZHAOFA WANG had been in the business of selling identity sets for an extended period of time and had a reputation for not taking money from customers who did not successfully obtain an identification card or driver's license. During this time, UCO-2 provided \$2,000 to CUSTOMER II, at which time, UCO-2 observed CUSTOMER II provide the money to ZHAOFA WANG.

228. At approximately 10:26 a.m., the Nissan Xterra arrived at the Midlothian Facility, at which time, CUSTOMER II entered the Midlothian Facility. Thereafter, ZHAOFA WANG provided additional instruction to UCO-2 relative to the driver's license process. Approximately six minutes later, UCO-2 entered the Midlothian Facility. While inside the facility, UCO-2 utilized the social security account card, PRC passport and T-Mobile bill previously provided to UCO-2 and followed the procedures for obtaining an Illinois identification card and for taking the ISOS Driver's License Written Examination. At approximately 11:36 a.m., CUSTOMER II was observed sitting in the Nissan Xterra. Approximately four minutes later, ZHAOFA WANG exited the Nissan Xterra

and CUSTOMER II drove the Nissan Xterra and entered the vehicle road test lane at the Midlothian Facility. At approximately 12:08 p.m., CUSTOMER II began the Vehicle Road Test with an ISOS Public Service Representative as a passenger. Approximately two minutes later, JUN XI ZHANG, driving the previously identified Toyota Rav4, was observed in the Midlothian Facility parking lot. At approximately 12:16 p.m., ZHAOFA WANG, who had been walking in the vicinity of the Midlothian Facility entered the Toyota Rav4. Approximately two minutes later, the Nissan Xterra returned to the Midlothian Facility and ZHAOFA WANG exited the Toyota Rav4 and approached CUSTOMER II who provided a set of keys to ZHAOFA WANG. Thereafter, CUSTOMER II entered the Midlothian Facility while ZHAOFA WANG relocated the Nissan Xterra within the parking lot.

229. At approximately 12:26 p.m., CUSTOMER II exited the Midlothian Facility and then entered the Nissan Xterra. Approximately two minutes later, UCO-2 conducted a consensually recorded telephone call with YONGHUI WANG. Based upon a review of the recorded conversation, UCO-2 stated, "The ID and the license (written test portion) have been done. I gave the money (\$2,000) to Ah Fang (ZHAOFA WANG). Give to him, right?" and YONGHUI WANG replied, "Give to him, I know, I know." Later, UCO-2 clarified again, "Ah Fang told you I had given him the two thousand dollars, right?" and YONGHUI WANG replied, " I know. He (ZHAOFA WANG) told me." Also during this conversation, YONGHUI WANG stated, "Where are you now? I'll tell him (ZHAOFA WANG) to go pick you up, okay?" Additionally, UCO-2 advised YONGHUI WANG that UCO-2 did not have time to take the ISOS Vehicle Road Test on December 30, 2008.

230. At approximately 12:28 p.m., UCO-2 exited the Midlothian Facility and was

thereafter transported back to Chicago's Chinatown community as surveilled by law enforcement officers. After UCO-2 exited the Nissan Xterra, CPD officers stopped the Nissan Xterra for a traffic offense and identified the driver as ZHAOFA WANG, as previously mentioned. Thereafter, law enforcement surveilled ZHAOFA WANG transport CUSTOMER II to 2925 South Wells Street, where CUSTOMER II exited the car and entered 2925 South Wells Street. At approximately 1:20 p.m., law enforcement observed YONGHUI WANG and CUSTOMER II exit 2925 South Wells Street and thereafter law enforcement surveilled YONGHUI WANG transport CUSTOMER II to the Chicago O'Hare Airport. YONGHUI WANG, driving Honda Accord[2], was then surveilled from Chicago O'Hare Airport back to 2925 South Wells Street, during which time, CPD officers stopped Honda Accord[2] for a traffic offense and identified the driver as YONGHUI WANG.

#### **HH. Review of Broker Advertisements**

231. Between approximately 2005 and 2009, law enforcement has observed various brokers advertising their ability to provide fraudulent documents. The following are examples of such advertisements which have been preliminarily translated as follows (approximate date of advertisement indicated in parentheses):

a. World Journal, Chicago Edition (December of 2006): "Quick/speedy, safely process driver's license, convert driver's license, out of state driver's license, look for Mr. Wang, 312-493-6057." Subpoenaed telephone records indicated that telephone number (312)493-6057 was subscribed to by Guian Zhao with an address of 509 West 28th Street, Chicago, Illinois. As previously set forth, WENYUAN ZHOU utilizes the identity of Guian Zhao. Furthermore, Affiant believes that brokers will often advertised a different name (Mr. Wang), for the purposes of trying to conceal their true identity.

b. World Journal, Chicago Internet Edition (April through July of 2007): "Contact: Mr. Shi, Miss Lin, birth certificate, notary, passport, apply ID, drivers license information, passport and extension, 312-285-6688." As previously set forth, telephone number (312)285-6688 is known to be utilized by YIYI SHI.

c. World Journal, New York Internet Edition (January - February of 2008): "Valid Driver's License, Quick legitimate for the Chicago five years ID driver's license, out of state, free bus and airport transfer, Mr. Cheung, 917-815-4952." As previously set forth, telephone number (917)815-4952 is known to be utilized by DONG DONG GUO.

d. World Journal, Chicago Edition (May 19, 2008): "Expedite driver's license, guarantee passing, Chicago driver's license, money back guarantee, Tony 917-667-2808." As previously set forth, XIN LI WANG is known to utilize telephone number (917)667-2808.

e. World Journal, Atlanta Edition (June 17, 2008): "Out-of-state driver's license, no legal status required, safe and reliable, Chinese or English written test, same day service, (312)545-7794." As previously set forth, JUN YUE ZHANG is known to utilize telephone number (312)545-7794.

f. World Journal, Atlanta Edition (June 17, 2008): "Global driver's license, legal driver's license and ID, same day service, money back guarantee, 917-667-1282." As previously set forth, MEIZHU WANG is known to utilize telephone number (917)667-1282.

g. World Journal, Atlanta Edition (June 17, 2008): "Driver's license, expert for Chicago driver's license, money back guarantee, airport or bus station pickup, Mr. Zhang 312-823-5035, Ms. Pan 312-823-5034." As previously set forth, JUN SHUN ZHANG is known to utilize telephone number (312)823-5035.

h. Kabarkilat, Internet Edition 338 (January 5, 2009): "Authentic Chicago driver license & ID card, we provide assistance in acquiring Chicago 5 yr. driver license, 6yr. ID card,

without the need of possessing (any) document!, (we) Provide insurance, title, free transportation from airports and bus stations, 630-747-0865, Michael Wang Manager." As previously set forth, YONGHUI WANG is known to utilize telephone number (630)747-0865. It should be noted that similar advertisements with telephone number (630)747-0865 have been observed in the World Journal during 2008.

## **II. RONG SI's Fraudulent Illinois Driver's License**

232. Based upon a review of records maintained by the U.S. Department of State, Affiant learned that on August 20, 1999, RONG SI, was issued a B1/B2 travel visa from the U.S. Embassy located in Beijing, PRC. In conjunction with obtaining this travel visa, RONG SI presented a passport from the PRC which indicated that RONG SI was born in the PRC on September 2, 1963. In addition, Affiant has reviewed a photograph of RONG SI which was submitted in conjunction with RONG SI's visa application.

233. On June 22, 2006, ISOS issued Illinois identification card number, XXX-XXXX-2670L, based upon an applicant that presented a Chinese passport, issued in the name, Meiyu Li, and listing a date of birth of March 8, 1972. Further, a review of ISOS records indicated that this applicant presented a social security account card bearing account number, 586-XX-XXXX, which was previously identified as SSAN-1, and provided a residential address of 1058 West 32nd Street, Chicago, IL. A review of the identification card application revealed that the applicant signed the application thereby acknowledging that, "Under penalties of perjury, I swear or affirm that all information submitted by me regarding this application is true and no fictitious documents have been presented for the purpose of this application." However, a review of the photograph associated with identification card number, XXX-XXXX-2670L, revealed that the individual depicted in the identification card photograph was RONG SI. Also, as previously mentioned, based on surveillance, RONG SI is known to utilize the residence located at 1058 West 32nd Street, Chicago, Illinois.

234. On June 29, 2006, ISOS issued Illinois driver's license number, XXXX-XXXX-2670, based upon an applicant that presented Illinois identification card number XXX-XXXX-2670L. A review of the driver's license application revealed that the applicant signed the application thereby acknowledging that, "Under penalties of perjury, I swear or affirm that all information submitted by me regarding this application is true and no fictitious documents have been presented for the purpose of this application." However, a review of the photograph associated with identification card number, XXXX-XXXX-2670, revealed that the individual depicted in the identification card photograph was RONG SI..

**JJ. LI WEN HUANG's Fraudulent Illinois Driver's Licenses**

235. A review of CPD arrest records revealed that on August 21, 2003, an individual was arrested for forgery, and was processed under the identity of Liwen Hong, with a date of birth of October 29, 1981. Affiant has reviewed an arrest photograph obtained by CPD in conjunction with this arrest. Based upon cross referencing the associated FBI number, related to this arrest, with records maintained by ICE this individual was more fully identified as LI WEN HUANG, with a date of birth of June 20, 1974.

236. On December 16, 2003, ISOS issued Illinois identification card number, XXXX-XXXX-175S, based upon an applicant that presented a Chinese passport bearing identification number 145181836, issued in the name, Chenggong Shi, and listing a date of birth of June 20, 1974. Further, a review of ISOS records indicated that this applicant presented a social security account card bearing account number 678-XX-XXXX. A review of the identification card application revealed that the applicant signed the application thereby acknowledging that, "Under penalties of perjury, I swear or affirm that all information submitted by me regarding this application is true and no fictitious documents have been presented for the purpose of this application." However, a review of the photograph associated with identification card number, XXXX-XXXX-175S, revealed that

the individual depicted in the identification card photograph appeared consistent with the individual depicted in the aforementioned CPD arrest photograph, specifically, LI WEN HUANG.

237. On approximately December 13, 2004, ISOS issued Illinois driver's license number, XXXX-XXXX-1266, based upon an applicant that presented a passport, from an unidentified country, with an unspecified identification number, issued in the name Zhen F. Chen, and listing a date of birth of September 18, 1971. Further, a review of ISOS records indicated that this applicant presented a social security account card bearing account number 052-XX-XXXX, and a Florida Driver's License bearing number XXXX-XXXX-13380. A review of the identification card application revealed that the applicant signed the application thereby acknowledging that, "Under penalties of perjury, I swear or affirm that all information submitted by me regarding this application is true and no fictitious documents have been presented for the purpose of this application." However, a review of the photograph associated with the driver's license bearing number, XXXX-XXXX-1266, revealed that the individual depicted in the driver's license photograph appeared consistent with the individual depicted in the aforementioned CPD arrest photograph, specifically, LI WEN HUANG.

238. On August 19, 2005, ISOS issued Illinois identification card number, XXXX-XXXX-203C, based upon an applicant that presented a Chinese passport bearing identification number 147576926, issued in the name Rongguo Cui, and listing a date of birth of July 17, 1976. Further, a review of ISOS records indicated that this applicant presented a social security account card bearing account number 586-XX-XXXX. A review of the identification card application revealed that the applicant signed the application thereby acknowledging that, "Under penalties of perjury, I swear or affirm that all information submitted by me regarding this application is true and no fictitious documents have been presented for the purpose of this application." However, a review of the photograph associated with identification card number, XXXX-XXXX-203C, revealed that

the individual depicted in the identification card photograph appeared consistent with the individual depicted in the aforementioned CPD arrest photograph, specifically, LI WEN HUANG.

239. On August 24, 2005, ISOS issued Illinois driver's license number, XXXX-XXXX-6203, based upon an applicant that presented Illinois identification card number, XXXX-XXXX-203C. A review of the driver's license application revealed that the applicant signed the application thereby acknowledging that, "Under penalties of perjury, I swear or affirm that all information submitted by me regarding this application is true and no fictitious documents have been presented for the purpose of this application." However, a review of the photograph associated with driver's license number, XXXX-XXXX-6203, revealed that the individual depicted in the identification card photograph appeared consistent with the individual depicted in the aforementioned CPD arrest photograph, specifically, LI WEN HUANG.

240. On approximately April 12, 2006, ISOS issued Illinois driver's license number, XXXX-XXXX-4401, based upon an applicant that presented a Chinese passport bearing identification number 146781885, issued in the name Shi Chun Li, and listing a date of birth of July 9, 1974. Further, a review of ISOS records indicated that this applicant presented a social security account card bearing account number 586-XX-XXXX. A review of the identification card application revealed that the applicant signed the application thereby acknowledging that, "Under penalties of perjury, I swear or affirm that all information submitted by me regarding this application is true and no fictitious documents have been presented for the purpose of this application." However, a review of the photograph associated with the driver's license bearing number, XXXX-XXXX-4401, revealed that the individual depicted in the driver's license photograph appeared consistent with the individual depicted in the aforementioned CPD arrest photograph, specifically, LI WEN HUANG.

241. Based upon information provided by ISOS, Affiant is aware that since approximately

June 16, 2004, all social security account numbers, provided by applicants who are seeking driver's license or identification cards, are cross-referenced with records maintained by the Social Security Administration. This collaborative check is done to insure that the social security account number is valid and, further, that the name and date of birth being provided by the applicant corresponds with name and date of birth on record with the Social Security Administration.

242. Based on your Affiant's training and experience, Affiant knows that it is a felony violation of Illinois law, under 625 ILCS 5/6-302, to present any document for the purpose of making an application for a driver's license knowing that such document contains false information concerning the identity of the applicant.

**KK. Practice of Fraudulent Document Manufacturers and Traffickers.**

243. Based on my experience, training, and conversations with other law enforcement officers who investigate the manufacture, distribution and sale of false identification documents, your Affiant knows that individuals typically retain information related to these false identification documents on computers and on external media including hard drives, floppy disks, flash/thumb drives, and recordable CDRs because the relevant documents and information are easier to conceal, transfer and store. As explained above, this investigation has revealed that the manufacturers of fraudulent identification documents often use computers. For instance, the manufacturers of false passports involved in this investigation often use a computer and printer to recreate a new PRC passport biographical page to match the identity related to the valid social security accounts for customers seeking to use these items to obtain Illinois identification cards or driver's licenses. I also know that individuals who manufacture, traffic and sell fraudulent documents maintain books, records, receipts, notes, ledgers, and other papers relating to the transportation, ordering, sale, and distribution of fraudulent identification documents, even though such documents may be in code. For instance, as explained above, the investigation has revealed that manufacturers of false

identification documents often provide the documents to brokers, who pay the manufacturer only after the customer has paid the broker. Accordingly, it is likely that manufacturers and brokers involved in this investigation will keep records regarding how much money is owed to or by a particular manufacturer or broker. Moreover, the investigation has revealed that manufacturers also keep track of the age and sex related to their supply of valid social security cards in order to better match valid social security cards to particular customers.

244. Your Affiant is also aware that criminal activity described above is ongoing. On February 11, 2009, JUN YUN ZHANG contacted the FBI Chicago office using **TARGET PHONE 2**. During the telephone conversation with a FBI Chinese-language interpreter, JUN YUN ZHANG provided his name and phone number and then stated that he was aware of individuals in the Chicago area who are creating and using fraudulent documents and wanted to cooperate with the FBI in identifying these individuals. On February 18, 2009, your Affiant learned from representatives of the ISOS, who stated that the ISOS is continuing to receive applications for identification cards and driver's licenses from applicants using social security account numbers with the prefix "586".

## **VI. CONCLUSION**

245. Based on the above information, there is probable cause to believe that defendants: JUN YUN ZHANG, a/k/a "Lao Sze"; JUN YUE ZHANG, a/ka "Lao San"; JUN XI ZHANG, a/k/a "Lao Wu"; JUN SHUN ZHANG, a/k/a "Mikey"; DONG DONG GUO, a/k/a "Xiao Zhang"; GUOQI ZHANG; TIANSHENG ZHANG; XIN LI WANG a/k/a "Tony"; MEIZHU WANG; YIYI SHI, a/k/a "YiYi" a/k/a "Huati"; SONG YAN SHI; WENYUAN ZHOU; YONGHUI WANG; ZHAOFA WANG; QIONG ZHOU; TIMOTHY T. JOHNSON JR.; and JAMES M. HOWELL, did knowingly and intentionally conspire with each other and others, to transfer, possess, or use, means of identification, namely social security numbers of other persons which were issued by or under the

authority of the United States, without lawful authority, with the intent to commit, or to aid or abet, or in connection with, an unlawful activity constituting a violation of federal law, namely, Title 42, United States Code, Section 408(a)(7)(B), and of Illinois law, namely, 625 ILCS 5/6-302, contrary to Title 18, United States Code, Section 1028(a)(7), all in violation of Title 18 United States Code, Section 1028(f).

246. Based on the above information, there is probable cause to believe that defendants LI WEN HUANG and RONG SI, did knowingly possess and use, without lawful authority, a means of identification of another person, namely social security numbers of other persons which were issued by or under the authority of the United States, with the intent to commit, or to aid or abet, or in connection with, commission of a violation of federal law, namely, Title 42, United States Code, Section 408(a)(7)(B), of Illinois law, namely 625 ILCS 5/6-302, all in violation of Title 18 United States Code, Section 1028(a)(7).

247. Based on the above information, there is also probable cause to believe that evidence of violations of Title 18, United States Code, Section 1028(a)(7) and 1028(f) will be located on the premises described in Attachments A-1 through A-4. Accordingly, I respectfully request that the court issue search warrants for the Search Residences described in Attachments A-1 through A-4.

248. Accordingly, I am seeking authorization to seize the evidence set forth in Attachment B.

249. Based upon my knowledge, training and experience, I know that in order to completely and accurately retrieve data maintained in computer hardware or on computer software, to insure accuracy and completeness of such data, and to prevent the loss of the data either from accidental or programmed destruction, it is often necessary that some computer equipment, peripherals, related instructions in the form of manuals and notes, as well as the software utilized to operate such a computer be seized and subsequently processed by a qualified computer specialist

in a laboratory setting. This is true because of the following:

a. Computer storage devices (like hard disks, diskettes, tapes, laser disks, Bernoulli drives, optical drives) can store the equivalent of thousands of pages of information. Additionally, a user may try to conceal criminal evidence by storing it in random order with deceptive file names. This may require searching authorities to examine all the stored data to determine which particular files are evidence or instrumentalities of crime. This sorting process can take weeks or months, depending on the volume of data stored, and it would be impractical to attempt this kind of data search on site.

b. Searching computer systems for criminal evidence is a highly technical process requiring expert skill and a properly controlled environment. The vast array of computer hardware and software available requires even computer experts to specialize in some systems and applications, so it is difficult to know before a search which expert is qualified to analyze the system and its data. Data search protocols are exacting scientific procedures designed to protect the integrity of the evidence and to recover even "hidden," erased, compressed, password-protected, or encrypted files. Since computer evidence is extremely vulnerable to inadvertent or intentional modification or destruction (both from external sources or from destructive code imbedded in the system as a "booby trap"), a controlled environment is essential to its complete and accurate analysis. Based on my training and experience I know that computer users sometimes encrypt files, and that such users may keep the encryption passwords or encryption keys separately written in their residences or on a separate computer file.

c. Because of the volume of the data at issue and the technical requirements set forth above, it is usually necessary that the above-referenced equipment, software, data, and related instructions be seized and subsequently processed by a qualified computer specialist in a laboratory setting. It may be the case, however, under appropriate circumstances, that some types of computer equipment can be more readily analyzed and pertinent data seized on-site, thus eliminating the need for its removal from the premises. One factor used in determining whether to analyze a computer on-site or to remove it from the premises is whether the computer constitutes an instrumentality of an offense and is thus subject to immediate seizure as such--or whether it serves as a mere repository for evidence of a criminal offense. Another determining factor is whether, as a repository for evidence, a particular device can be more readily, quickly, and thus less intrusively analyzed off site, with due consideration given to preserving the integrity of the evidence. This, in turn, is often dependent upon the amount of data and number of discrete files or file areas that must be analyzed, and this is frequently dependent upon the particular type of computer hardware involved.

250. As explained above, law enforcement agents expect to find at the Search Residences, identified in paragraph 3 above and in attachment A-1 through A-4, one or more "micro" or "personal" computers, which are used either as instrumentalities of criminal offenses or as storage devices for possible evidence of criminal offenses. These computers are likely to be standing alone

or joined through a series of connected computers called a "network." Computers recognized in the computer trade as "micro" or "personal" computers share the characteristic that they are often small devices, often capable of being stored on or in a single desk or station. While the storage capabilities of such devices vary, micro or personal computers are more often designed to facilitate usage by a single individual. Because of these characteristics, physical removal of micro or personal computers is often the more practical alternative, and is often less intrusive than requiring federal agents to remain at the premises for the amount of time reasonably required to review, analyze, and copy pertinent data. Thus a presumption exists that such computers will be seized and subsequently processed by a qualified computer specialist in a laboratory setting for reasons set forth above.

251. Based upon my knowledge, training, and experience, and the experience of other law enforcement personnel, I know that searches and seizures of evidence from computers taken from the subject premises commonly require agents to seize most or all of a computer system's input/output peripheral devices for a qualified computer expert to accurately retrieve the system's data in a laboratory or other controlled environment. Therefore, in those instances where computers are removed from the subject premises, and in order to fully retrieve data from a computer system, investigators must seize all magnetic storage devices as well as the central processing units (CPUs) and applicable keyboards and monitors which are an integral part of the processing unit.<sup>141</sup> If, after inspecting the input/output devices, system software, and pertinent computer-related documentation

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<sup>141</sup> The peripheral devices that allow users to enter or retrieve data from the storage devices vary widely in their compatibility with other hardware and software. Many system storage devices require particular input/output (or "I/O") devices in order to read the data on the system. It is important that the analyst be able to properly re-configure the system as it now operates in order to accurately retrieve the evidence listed above. In addition, the analyst needs all the system software (operating systems or interfaces, and hardware drivers) and any applications software which may have been used to create the data (whether stored on hard drives or on external media), as well as all related instruction manuals or other documentation. Without these items, it may be difficult to recreate the computer environment in which the seized data was created. This is important both for thorough analysis and for establishing the ultimate integrity of the seized data.

it becomes apparent that these items are no longer necessary to retrieve and preserve the data evidence, such materials and/or equipment will be returned within a reasonable time.

252. Representatives of the FBI specially trained in computer evidence recovery will supervise the retrieval of digitally based evidence from the computers and premises located at the Search Residences, identified in paragraph 3 above and attachments A-1 through A-4. Based upon the nature of the alleged criminal activity, it is common for incriminating evidence of computer fraud and abuse to be secreted or deleted on a subject's computer system. In an effort to minimize the level of intrusion and inconvenience an attempt will be made to make a physical image (digital copy) of the digitally stored information on any computers located at the premises. If these on-site efforts to obtain an image of the computers fail, the computers will be removed to the offices of the FBI and/or the offices of the Regional Computer Forensic Laboratory ("RCFL") where it will be imaged and returned in a timely manner.

253. Based upon my training and experience, as well as that of other Special Agents of the FBI, I believe that it is likely that a contemporaneous analysis of diskettes, backup tapes and other computer data storage media will be impractical and extremely time-consuming. For that reason, it will be necessary to seize such items so as to facilitate an off-site analysis to locate evidence authorized to be seized by this search warrant. Such procedure will also minimize the disruption to the residents of the Search Residences. Thus, I request authorization to remove such items for off-site analysis to locate evidence authorized to be seized by the search warrant. The digital storage media (floppy diskettes, removable disk drives, CD-ROM disks, backup tapes) will be removed to the offices of the FBI for imaging/analysis and will be returned to the owner as soon as possible.

254. This warrant does not authorize the "seizure" of computers and related media within the meaning of Rule 41(c) of the Federal Rules of Criminal Procedure. Rather this warrant

authorizes the removal of computers and related media so that they may be searched in a secure environment. The search shall be conducted pursuant to the following protocol:

With respect to the search of any computers or electronic storage devices seized from the Search Residences identified in Attachments A-1 through A-4 hereto, the search procedure of electronic data contained in any such computer may include the following techniques (the following is a non-exclusive list, and the government may use other procedures that, like those listed below, minimize the review of information not within the list of items to be seized as set forth herein):

- a. examination of all the data contained in such computer hardware, computer software, and/or memory storage devices to determine whether that data falls within the items to be seized as set forth herein;
- b. searching for and attempting to recover any deleted, hidden, or encrypted data to determine whether that data falls within the list of items to be seized as set forth herein (any data that is encrypted and unreadable will not be returned unless law enforcement personnel have determined that the data is not (1) an instrumentality of the offenses, (2) a fruit of the criminal activity, (3) contraband, (4) otherwise unlawfully possessed, or (5) evidence of the offenses specified above);
- c. surveying various file directories and the individual files they contain to determine whether they include data falling within the list of items to be seized as set forth herein;
- d. opening or reading portions of files in order to determine whether their contents fall within the items to be seized as set forth herein;
- e. scanning storage areas to discover data falling within the list of items to be seized as set forth herein, to possibly recover any such recently deleted data, and to search for and recover deliberately hidden files falling within the list of items to be seized; and/or
- f. performing key word searches through all electronic storage areas to determine whether occurrences of language contained in such storage areas exist that are likely to appear in the evidence described in Attachment B.

The government will return any computers or electronic storage devices seized from the residence described in Attachment B hereto within 30 days of the seizure thereof, unless contraband is found on the seized computer and/or electronic storage device.

FURTHER AFFIANT SAYETH NOT.

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David A. Patch  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed before me  
on this \_\_\_\_\_ day of February, 2009.

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Michael T. Mason  
Magistrate Judge  
United States District Court