
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : CRIMINAL COMPLAINT

v. :

YOUNG-KYU PARK, : Mag No. 12-7168 (CLW)
a/k/a "Oscar,"
a/k/a "Anthony Bak,"
SOONG-YOUNG PARK,
HANNA PARK,
HYEUN-JIN PARK,
a/k/a "Sharine,"
YANG-GON KIM,
a/k/a "David,"
JONG-HYEK PARK,
a/k/a "Sean,"
KI-SOK KIM,
a/k/a "Ken,"
JOON-SANG LEE,
BOO PARK,
a/k/a "Peter,"
HUONG K. SHIN,
a/k/a "Michael,"
HO-MAN LEE,
SAMUEL H. PARK,
JONG-HO KIM,
KAE-WON JHO,
a/k/a "Erica,"
YOUNG-BAE GU,
HAI-SOK CHO,
YONG-HAE KIM,
a/k/a "Mr. Bae,"
SUNG-KUM CHOI,
a/k/a "Sam,"
a/k/a "Thomas Bae,"
a/k/a "Young-Guk Choi,"
JONG-HYUK PARK,
a/k/a "Alex,"
SUNG-HEE BAE,
a/k/a "Tina,"
MARTIN TREJO, and
a/k/a "Marty,"
KARINE MICHMICHIAN

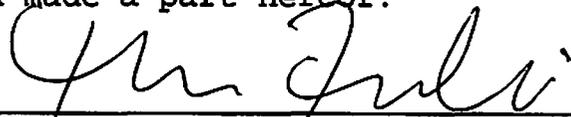
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

SEE ATTACHMENT A

I further state that I am a Special Agent, and that this complaint is based on the following facts:

SEE ATTACHMENT B

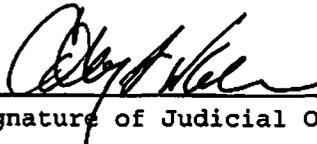
continued on the attached page and made a part hereof.



Theresa M. Fanelli, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
on June 20, 2012, at Newark, New Jersey

HONORABLE CATHY L. WALDOR
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Count One (Conspiracy to Produce Identification Documents
and False Identification Documents)

From in or around September 2010 through on or about the date of this Criminal Complaint, in Bergen County, in the District of New Jersey and elsewhere, defendants

YOUNG-KYU PARK,
a/k/a "Oscar,"
a/k/a "Anthony Bak,"
SOONG-YOUNG PARK,
HANNA PARK,
HYEUN-JIN PARK,
a/k/a "Sharine,"
YANG-GON KIM,
a/k/a "David,"
JONG-HYEK PARK,
a/k/a "Sean,"
KI-SOK KIM,
a/k/a "Ken,"
JOON-SANG LEE,
BOO PARK,
a/k/a "Peter,"
HUONG K. SHIN,
a/k/a "Michael,"
HO-MAN LEE,
SAMUEL H. PARK,
JONG-HO KIM,
KAE-WON JHO,
a/k/a "Erica,"
YOUNG-BAE GU,
HAI-SOK CHO,
YONG-HAE KIM,
a/k/a "Mr. Bae,"
SUNG-KUM CHOI,
a/k/a "Sam,"
a/k/a "Thomas Bae,"
a/k/a "Young-Guk Choi,"
JONG-HYUK PARK,
a/k/a "Alex,"
SUNG-HEE BAE, and
a/k/a "Tina,"

knowingly and intentionally conspired and agreed with each other and others to produce, without lawful authority, identification documents, namely, genuine but fraudulently issued driver's

licenses, and false identification documents, namely, altered and counterfeit Korean passports, in and affecting interstate and foreign commerce, as described in Attachment B below of this Criminal Complaint, contrary to Title 18, United States Code, Sections 1028(a)(1), 1028(b)(1), and 1028(c)(3)(A), in violation of Title 18, United States Code, Section 1028(f).

Count Two (Conspiracy to Steal Government Property and to Transport Stolen Property in Interstate Commerce)

From in or around September 2010 through in or around February 2012, in Bergen County, in the District of New Jersey and elsewhere, defendants

YOUNG-KYU PARK,
a/k/a "Oscar,"
a/k/a "Anthony Bak,"
MARTIN TREJO,
a/k/a "Marty," and
KARINE MICHMICHIAN

knowingly and intentionally conspired and agreed with each other and others to commit offenses against the United States, namely:

(a) embezzling, stealing, purloining, and converting to their use and the use of others, including individuals in New Jersey, and without authority, selling, conveying, and disposing of a record and thing of value of the United States or of any department or agency thereof, and any property made or being made under contract for the United States and any department or agency thereof, namely Forms I-797, Notice of Action, with a value exceeding \$1,000, contrary to Title 18, United States Code, Section 641; and

(b) transporting and causing to be transported in interstate commerce stolen goods, wares, and merchandise having a value of \$5,000 or more, knowing that the goods, wares, and merchandise had been stolen, converted, and taken by fraud, in violation of Title 18, United States Code, Section 2314; and

(c) receiving, possessing, concealing, storing, selling, and disposing goods, wares and merchandise of the value of \$5,000 or more, which have crossed a state after being stolen, unlawfully converted and taken, knowing the same to have been stolen, unlawfully converted and taken, in violation of Title 18 United States Code, Section 2315.

In furtherance of the conspiracy and to effect its unlawful objects, the above-listed defendants and their co-conspirators committed and caused to be committed the overt acts, among others, in the District of New Jersey and elsewhere, as set forth in Attachment B of the Criminal Complaint.

In violation of Title 18, United States Code, Section 371

Count Three (Conspiracy to Commit Money Laundering)

From in or around September 2010 through on or about June 26, 2012, in Bergen County, in the District of New Jersey and elsewhere, defendants

YOUNG-KYU PARK,
a/k/a "Oscar,"
a/k/a "Anthony Bak,"
SOONG-YOUNG PARK,
HANNA PARK,
HYEUN-JIN PARK,
a/k/a "Sharine,"
BOO PARK,
a/k/a "Peter,"
HO-MAN LEE, and
YOUNG-BAE GU

knowingly conspired and agreed with each other and others to conduct financial transactions affecting interstate commerce, which financial transactions involved the proceeds of specified unlawful activity, namely, violations of Title 18, United States Code, Section 1028, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, contrary to Title 18, United States Code, Section 1956(a)(1)(B)(i), in violation of Title 18, United States Code, Section 1956(h).

ATTACHMENT B

I, Theresa M. Fanelli, am a Special Agent with the Federal Bureau of Investigation. I have knowledge of the facts set forth herein through my personal participation in this investigation and through oral and written reports from other federal agents or other law enforcement officers. Where statements of others are set forth herein, including statements that were intercepted or consensually recorded, these statements are related in substance and in part. Furthermore, these conversations, unless otherwise indicated, occurred in the Korean language, and Your Affiant has reviewed and relied on the translations of these conversations. Since this Criminal Complaint is being submitted for a limited purpose, I have not set forth every fact that I know or other law enforcement officers know concerning this investigation. I have only set forth those facts that I believe are sufficient to show probable cause exists to believe that the defendants have committed the offenses set forth in Attachment A. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

The Defendants and Other Parties

1. At all times relevant to this Criminal Complaint:

a. Defendant Young-Kyu Park, a/k/a "Oscar," and "Anthony Bak," (hereinafter "Young-Kyu Park") was a resident of Fort Lee, New Jersey until in or around April 2011. In or around April 2011, defendant Young-Kyu Park moved to Los Angeles, California and has maintained his domicile in that state since that time. Defendant Young-Kyu Park was the leader of a criminal enterprise (hereinafter the "Park Criminal Enterprise") that operated in New Jersey, Los Angeles, California, Las Vegas, Nevada, Georgia, Virginia, and elsewhere. This criminal enterprise provided a suite of illegal services to individuals who were illegally residing in the United States (hereinafter the "Customer" or "Customers"). These illegal services included fraudulently obtaining driver's licenses for the Customers and fraudulently obtaining certain visas, such as investor (E-2 visas) and student visas (F-1 visas). At various times, defendant Young-Kyu Park operated out of several offices, including the following: (1) an office in Palisades Park, New Jersey under the name "Iron Trading Corp." and "EWIC" [East-West Immigration Corporation] (hereinafter the "Young-Kyu Park Palisades Park Office"); (2) an office in Fort Lee, New Jersey under the name, "Iron Trading Corp" (hereinafter the "Young-Kyu Park Fort Lee Office"); and (3) an office in Las Vegas, Nevada

under the name "J&S Legal Corp." (hereinafter the "Young-Kyu Park Las Vegas Office").

b. Defendant Soong-Young Park (hereinafter "Soong-Young Park") was the wife of defendant Young-Kyu Park and a resident of Los Angeles, California. Defendant Soong-Young Park was a member of the Park Criminal Enterprise who conducted and directed financial transactions on behalf of the Park Criminal Enterprise to conceal the criminal nature of the funds and to promote the continuation of the enterprise. Furthermore, defendant Soong-Young Park facilitated the receipt and delivery of altered and counterfeit documents. Defendant Soong-Young Park controlled and was the sole signatory on the following bank accounts: (1) a Bank of America personal checking account (hereinafter the "Soong-Young Park Bank of America Account"); (2) a Wells Fargo personal checking account (hereinafter the "Soong-Young Park Wells Fargo Account"); and (3) a Chase personal checking account (hereinafter the "Soong-Young Park Chase Account").

c. Defendant Hanna Park (hereinafter "Hanna Park") was the daughter of defendants Young-Kyu Park and Soong-Young Park who was a resident of Los Angeles, California. Defendant Hanna Park was a member of the Park Criminal Enterprise who conducted and directed financial transactions on behalf of the Park Criminal Enterprise to conceal the criminal nature of the funds and to promote the continuation of the enterprise. Furthermore, defendant Hanna Park facilitated the receipt and delivery of altered and counterfeit documents. Defendant Hanna Park controlled and was the sole signatory on the following bank accounts: (1) one Wells Fargo personal checking account (hereinafter the "Hanna Park Wells Fargo Checking Account"); (2) one Wells Fargo savings account (hereinafter the "Hanna Park Wells Fargo Savings Account"); and (3) two Citibank personal checking accounts (hereinafter the "First Hanna Park Citibank Account" and the "Second Hanna Park Citibank Account") and one Citibank personal savings account (hereinafter the "Third Hanna Park Citibank Account").

d. Defendant Hyeun-Jin Park, a/k/a "Sharine," (hereinafter "Hyeun-Jin Park") was the girlfriend of defendant Young-Kyu Park and formerly a resident of Fort Lee, New Jersey. In or around August 2011, defendant Hyeun-Jin Park moved to Las Vegas, Nevada and has maintained her domicile in that state since that time. Defendant Hyeun-Jin Park was a member of the Park Criminal Enterprise who assisted Customers and escorted them to state agencies to fraudulently obtain driver's licenses; obtained cash payments from Customers in exchange for the fraudulent

documents needed to obtain the driver's licenses; fielded phone calls from Customers; received and delivered altered and counterfeit documents to and from other co-conspirators related to the driver's license scheme; and conducted financial transactions on behalf of the Park Criminal Enterprise to conceal the criminal nature of the funds and to promote the continuation of the enterprise. Defendant Hyeun-Jin Park controlled and was the sole signatory on the following bank accounts: (1) a Bank of America personal checking account (hereinafter the "Hyeun-Jin Park Bank of America Account"); and (2) a Chase personal checking account (hereinafter the "Hyeun-Jin Park Chase Account").

e. Defendant Yang-Gon Kim, a/k/a "David," (hereinafter "Yang-Gon Kim") was a resident of Los Angeles, California. Defendant Yang-Gon Kim was a member of the Park Criminal Enterprise who altered, counterfeited, and created documents, such as bank statements.

f. Defendant Jong-Hyek Park, a/k/a "Sean," (hereinafter "Jong-Hyek Park") was defendant Young-Kyu Park's nephew and a resident of Oak Hills, California and later Las Vegas, Nevada. Defendant Jong-Hyek Park was a member of the Park Criminal Enterprise who altered, counterfeited, and created documents, such as bank statements. Defendant Jong-Hyek Park operated out of the Young-Kyu Park Las Vegas Office.

g. Defendant Ki-Sok Kim, a/k/a "Ken," (hereinafter "Ki-Sok Kim") was a resident of Tenafly, New Jersey. Defendant Ki-Sok Kim was a member of the Park Criminal Enterprise who assisted Customers and escorted them to state agencies to fraudulently obtain driver's licenses; obtained cash payments from Customers in exchange for the fraudulent documents needed to obtain the driver's licenses; received and delivered altered and counterfeit documents to and from other co-conspirators related to the driver's license scheme; and conducted financial transactions on behalf of the Park Criminal Enterprise to conceal the criminal nature of the funds and to promote the continuation of the enterprise.

h. Defendant Joon-Sang Lee (hereinafter "Joon-Sang Lee") was a resident of New York and formerly a resident of New Jersey. Defendant Joon-Sang Lee was a member of the Park Criminal Enterprise who handled and managed Customers seeking to fraudulently obtain driver's licenses and immigrations status, such as E-2 visa status.

i. Defendant Boo Park, a/k/a "Peter," (hereinafter "Boo Park") was a resident of Cliffside Park, New Jersey.

Defendant Boo Park was a member of the Park Criminal Enterprise who assisted Customers and escorted them to state agencies to fraudulently obtain driver's licenses; obtained cash payments from Customers in exchange for the fraudulent documents needed to obtain the driver's licenses; received and delivered altered and counterfeit documents to and from other co-conspirators related to the driver's license scheme; and conducted financial transactions on behalf of the Park Criminal Enterprise to conceal the criminal nature of the funds and to promote the continuation of the enterprise.

j. Defendant Huong K. Shin, a/k/a "Michael," (hereinafter "Huong K. Shin") was a resident of Palisades Park, New Jersey. Defendant Huong K. Shin was a member of the Park Criminal Enterprise who assisted Customers and escorted them to state agencies to fraudulently obtain driver's licenses; obtained cash payments from Customers in exchange for the fraudulent documents needed to obtain the driver's licenses; received and delivered altered and counterfeit documents to and from other co-conspirators related to the driver's license scheme; and conducted financial transactions on behalf of the Park Criminal Enterprise to conceal the criminal nature of the funds and to promote the continuation of the enterprise.

k. Defendant Ho-Man Lee (hereinafter "Ho-Man Lee") was a resident of Alexandria, Virginia. Defendant Ho-Man Lee was a member of the Park Criminal Enterprise who assisted Customers and escorted them to state agencies to fraudulently obtain driver's licenses; obtained cash payments from Customers in exchange for the fraudulent documents needed to obtain the driver's licenses; received and delivered altered and counterfeit documents to and from other co-conspirators related to the driver's license scheme; and conducted financial transactions on behalf of the Park Criminal Enterprise to conceal the criminal nature of the funds and to promote the continuation of the enterprise.

l. Defendant Samuel H. Park (hereinafter "Samuel H. Park") was a resident of Duluth, Georgia. Defendant Samuel H. Park was a member of the Park Criminal Enterprise who assisted Customers in fraudulently obtaining driver's licenses and obtained cash payments from Customers; received and delivered altered and counterfeit documents to and from other co-conspirators; and conducted financial transactions on behalf of the Park Criminal Enterprise to conceal the criminal nature of the funds and to promote the continuation of the enterprise.

m. Defendant Jong-Ho Kim (hereinafter "Jong-Ho Kim") was a resident of Annandale, Virginia. Defendant Jong-Ho Kim was a member of the Park Criminal Enterprise who assisted Customers and escorted them to state agencies to fraudulently obtain driver's licenses; obtained cash payments from Customers in exchange for the fraudulent documents needed to obtain the driver's licenses; and received and delivered altered and counterfeit documents to and from other co-conspirators related to driver's license scheme.

n. Kae-Won Jho, a/k/a "Erica," (hereinafter "Kae-Won Jho") was a resident of Duluth, Georgia. Defendant Kae-Won Jho was a member of the Park Criminal Enterprise who assisted Customers with fraudulently obtaining driver's licenses; obtained cash payments from Customers in exchange for the fraudulent documents needed to obtain the driver's licenses; received and delivered altered and counterfeit documents to and from other co-conspirators related to driver's license scheme; and conducted financial transactions on behalf of the Park Criminal Enterprise to conceal the criminal nature of the funds and to promote the continuation of the enterprise.

o. Defendant Young-Bae Gu (hereinafter "Young-Bae Gu") was a resident of Henderson, Nevada. Defendant Young-Bae Gu was a member of the Park Criminal Enterprise who assisted Customers and escorted them to state agencies to fraudulently obtain driver's licenses; obtained cash payments from Customers in exchange for the fraudulent documents needed to obtain the driver's licenses; received and delivered altered and counterfeit documents to and from other co-conspirators related to the driver's license scheme; and conducted financial transactions on behalf of the Park Criminal Enterprise to conceal the criminal nature of the funds and to promote the continuation of the enterprise.

p. Defendant Hai-Sok Cho (hereinafter "Hai-Sok Cho") was a resident of Leonia, New Jersey. Defendant Hai-Sok Cho was a broker who conspired with members of the Park Criminal Enterprise to fraudulently obtain driver's licenses on behalf of Customers.

q. Defendant Yong-Hae Kim, a/k/a "Mr. Bae," (hereinafter "Yong-Hae Kim") was a resident of Palisades Park, New Jersey. Defendant Yong-Hae Kim was a broker who conspired with members of the Park Criminal Enterprise to fraudulently obtain driver's licenses on behalf of Customers.

r. Sung-Kum Choi, a/k/a "Sam," "Thomas Bae," and "Young-Guk Choi," (hereinafter "Sung-Kum Choi") was a resident of Fort Lee, New Jersey. Defendant Sung-Kum Choi was a broker who recruited and fraudulently obtained driver's licenses for customers of his own for a fee. Defendant Sung-Kum Choi and his cohorts obtained and purchased fraudulently obtained Forms I-797 from the Park Criminal Enterprise, which forms defendant Sung-Kum Choi and his cohorts then used to fraudulently obtain driver's licenses on behalf of their own customers.

s. Defendant Jong-Hyuk Park, a/k/a "Alex," (hereinafter "Jong-Hyuk Park") was a resident of Fort Lee, New Jersey and a relative of Sung-Kum Choi. Defendant Jong-Hyuk Park was an associate of defendant Sung-Kum Choi who assisted Customers and escorted them to state agencies to fraudulently obtain driver's licenses. Defendant Jong-Hyuk Park also obtained cash payments from customers in exchange for the fraudulent documents needed to obtain the driver's licenses and received and delivered altered and counterfeit documents to and from others related to the driver's license scheme.

t. Defendant Sung-Hee Bae, a/k/a "Tina," (hereinafter "Sung-Hee Bae") was a resident of Ridgefield, New Jersey. Defendant Sung-Hee Bae was an associate of defendant Sung-Kum Choi who assisted others and escorted them to state agencies to fraudulently obtain driver's licenses. Defendant Sung-Hee Bae also obtained cash payments from customers in exchange for the fraudulent documents needed to obtain the driver's licenses and received and delivered altered and counterfeit documents to and from others related to the driver's license scheme.

u. Defendant Martin Trejo, a/k/a "Marty," (hereinafter "Martin Trejo") was a resident of Rialto, California and was employed as a contractor by the United States Citizenship and Immigration Services (hereinafter "USCIS") at the Western Forms Center, located in Montclair, California, as a material document handler. The Western Forms Center was the largest warehouse storage facility for immigration forms in the United States. Defendant Martin Trejo stole and fraudulently obtained certain immigration forms from the Western Forms Center and sold the forms, through an intermediary, namely, defendant Karine Michmichian (see below), to the Park Criminal Enterprise. The Park Criminal Enterprise, in turn, sold these fraudulently obtained immigration documents to the Customers, who used these fraudulently obtained Forms I-797, together with other fraudulent documents, to unlawfully obtain driver's licenses.

v. Defendant Karine Michmichian (hereinafter "Karine Michmichian") was a resident of Los Angeles, California. Defendant Karine Michmichian was the intermediary who obtained stolen and fraudulently obtained immigration documents from defendant Martin Trejo and then sold the stolen forms to the Park Criminal Enterprise. Defendant Young-Kyu Park and his co-conspirators then transported these stolen forms to various states, including New Jersey, where they were used in furtherance of the Park Criminal Enterprise's driver's license scheme.

Other Parties

w. An individual was cooperating with law enforcement (hereinafter "Cooperating Witness One").

x. An individual was cooperating with law enforcement (hereinafter "Cooperating Witness Two").

y. An individual was cooperating with law enforcement (hereinafter "Cooperating Witness Three").

Interception of Wire Communications-The Wire Taps

z. During this investigation, at various times, federal agents applied for and obtained Court ordered authorization to intercept wire communications occurring over the following telephone facilities:

(1) a cellular telephone used by defendant Young-Kyu Park with a number ending in 8154 (hereinafter the "First Young-Kyu Park Target Facility"); and

(2) a cellular telephone used by defendant Young-Kyu Park with a number ending in 6611 (hereinafter the "Second Young-Kyu Park Target Facility").

The Search Warrants

aa. During this investigation, federal agents applied for and obtained Court ordered authorization to search for and seize the following:

(1) emails and related documents from a Gmail account belonging to defendant Young-Kyu Park under his alias "Anthony Bak" (hereinafter the "First Young-Kyu Park Email Account");

(2) emails and related documents from a Yahoo! account belonging to defendant Young-Kyu Park under his alias "Anthony" (hereinafter the "Second Young-Kyu Park Email Account");

(3) emails and related documents from a Yahoo! account belonging to defendant Young-Kyu Park under his alias "Oscar Park" (hereinafter the "Third Young-Kyu Park Email Account");

(4) text messages and related documents from a cellular telephone used by defendant Karine Michmichian and ending in 3496 (hereinafter the "Karine Michmichian Target Facility"); and

(5) text messages and related documents from the First Young-Kyu Park Target Facility and the Second Young-Kyu Park Target Facility.

Overview of the Criminal Enterprise

2. To enrich themselves and further the goals and aims of the Park Criminal Enterprise, defendant Young-Kyu Park and his co-conspirators engaged in the following schemes:

a. Fraudulent Driver's License Scheme. The Park Criminal Enterprise fraudulently obtained genuinely issued driver's licenses, issued by New Jersey, New York, Virginia, Nevada, and elsewhere, on behalf of the Customers. To fraudulently obtain these genuinely issued driver's licenses, defendant Young-Kyu Park and his co-conspirators obtained, created, and counterfeited a variety of documents that they then sold to the Customers to allow them to fraudulently obtain driver's licenses. As part of the scheme, defendant Young-Kyu Park and his co-conspirators purchased genuine United States immigration documents that had been stolen by defendant Martin Trejo, a federal government contract employee. Thereafter, the Park Criminal Enterprise falsified these immigration documents, altered and counterfeited other immigration documents, such as passports, and created and provided to the Customers other fictitious document, such as fictitious utility bills and bank statements. The Park Criminal Enterprise maintained a network of co-conspirators in New Jersey, Nevada, Georgia, and Virginia that met with the Customers, provided them with the fraudulent documents in exchange for cash, and then escorted the Customers to various state agencies that issued driver's license. The Customers referred in this Criminal Complaint had no lawful immigration status in the United States or were otherwise each

ineligible to obtain driver's licenses. These Customers typically paid the Park Criminal Enterprise a fee of approximately \$3,000 to \$4,500 for the enterprise's unlawful services.

b. E-2 Visa Scheme. For a fee of approximately \$10,000, the Park Criminal Enterprise fraudulently obtained E-2 visas (a visa that allowed a foreign national to enter and work in the United States as an investor) by creating fictitious companies and the supporting documents necessary to file a petition for the visa with the USCIS.

Cooperating Witness One

3. As part of this investigation, law enforcement officers debriefed Cooperating Witness One. Cooperating Witness One reported the following information:

a. Defendant Young-Kyu Park and his co-conspirators fraudulently obtained driver's licenses in various states for Customers, and virtually all of defendant Young-Kyu Park's "business" was illegal in nature. Defendant Young-Kyu Park placed advertisements in Korean newspapers wherein defendant Young-Kyu Park stated he could obtain driver's licenses and provide other immigration services. To obtain the driver's licenses, defendant Young-Kyu Park and his co-conspirators obtained information and documents from the Customers, such as Korean passports or a Korean citizen number, Forms I-94 [a United States immigration document issued to visitors to the United States who hold a valid U.S. visa that records the arrival and departure information of the visitor], documents to verify the Customer's address, if available, and a social security number, if available. The Customers did not have legal immigration status in the United States and therefore could not lawfully obtain driver's licenses in New Jersey. Cooperating Witness One reported that defendant Young-Kyu Park charged each Customer a fee of between approximately \$3,000 and \$4,500 cash to obtain driver's licenses in New Jersey and elsewhere.

b. Defendant Young-Kyu Park obtained, manufactured, and provided to Customers a variety of fraudulent, counterfeited, and altered documents to allow the Customer to deceive state agencies and induce them to issue driver's licenses to the illegal alien Customers. For example, where a Customer could not legitimately meet the 6-point requirement to obtain a New Jersey driver's license, defendant Young-Kyu Park obtained authentic but

fraudulently obtained Forms I-797¹ for the Customers. Defendant Young-Kyu Park and his co-conspirators then entered the Customers' real data into the Forms I-797. Furthermore, the Customers then used the Forms I-797, along with other documentation, to fraudulently obtain New Jersey driver's licenses.

c. In or around late October 2010, defendant Young-Kyu Park approached Cooperating Witness One and requested him/her to assist defendant Young-Kyu Park's Customers. Defendant Young-Kyu Park directed Cooperating Witness One to advertise in a local Korean newspaper with the name "New Jersey Drivers Licenses." Defendant Young-Kyu Park advised Cooperating Witness One to use his/her own phone number in the advertisement (hereinafter the "Cooperating Witness One Facility").

4. As requested by defendant Young-Kyu Park and under the supervision and direction of the Federal Bureau of Investigation, in or around early November 2010, Cooperating Witness One placed an advertisement in a Korean newspaper, advertising defendant Young-Kyu Park's services under the name "New Jersey Driver's License" [sic] and listing the Cooperating Witness One Facility. The advertisement ran from on or about November 12, 2010 to on or

1. A Form I-797 is used by USCIS, a division of the Department of Homeland Security, to communicate with customers or convey an immigration benefit. State agencies that issue driver's licenses rely on Forms I-797 to verify the authenticity of the applicant's foreign passport and to verify the applicant's lawful presence in the United States. The Form I-797 is a government document and is property of the United States. USCIS uses numerous types of Form I-797, including the following: (a) Form I-797 is issued when an immigration application or petition is approved; (b) Form I-797A is issued to an applicant as a replacement Form I-94 (an Arrival and Departure Record used by both USCIS and U.S. Customs and Border Protection (hereinafter "CBP")) to track visitors to the United States traveling on non-immigrant visas); (c) Form I-797B is issued for approval of an alien worker petition; (d) Form I-797C is issued to communicate receipt of payments, rejection of applications, transfer of files, fingerprint biometric, interviews and re-scheduled appointments, and to re-open cases; (e) Form I-797D is issued with benefit cards, such as Employment Authorization Documents and Permanent Residence Cards (commonly known as "green cards"); (f) Form I-797E is issued to request evidence; and (g) Form I-797F, Transportation Letter, is issued overseas to allow applicants to travel to the United States. The Forms I-797 are not accessible by civilians, and these forms are only accessible by employees of the United States government. These forms are not permitted to be sold to civilians. The Form I-797 is not a form that is filled out by the customer.

about February 15, 2011. After placing this advertisement, Cooperating Witness One began receiving calls from potential customers with "immigration" and "driver's licenses" issues who sought defendant Young-Kyu Park's services. After the Customer called, Cooperating Witness One stated that he/she collected information from the Customer, determined which services the Customer needed, and then communicated this information to defendant Young-Kyu Park, who then manufactured or obtained the needed documents for the Customers and made the arrangements necessary to deliver the requested services to the Customers. According to Cooperating Witness One, the Customers usually only communicated directly with Cooperating Witness One, who acted as a middleman between the Customers and defendant Young-Kyu Park. Cooperating Witness One also reported that defendant Young-Kyu Park frequently sent Customers to Cooperating Witness One so that he/she could handle the logistics of the Customers' cases and accompany the Customers to an office of the New Jersey Motor Vehicle Commission (hereinafter the "NJMVC").

5. Customer S.K.

a. On or about November 23, 2010, an individual with the initials S.K. (hereinafter "Customer S.K.") contacted Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, Customer S.K. requested to meet with Cooperating Witness One. Later that day, Cooperating Witness One met Customer S.K. in Fort Lee, New Jersey. During this consensually recorded meeting (audio and video), Customer S.K. stated that he needed to change the expiration date on his passport and needed supporting documents so that he could obtain a driver's license.

b. On or about December 8, 2010, Customer S.K. contacted Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, Cooperating Witness One advised Customer S.K. to bring his social security card and his old passport with the visa attached. Customer S.K. asked which documents would be provided to him for obtaining his driver's license and whether or not he should be worried about being caught by the NJMVC. Cooperating Witness One told Customer S.K. not to worry. Later that day, Cooperating Witness One met Customer S.K. in Fort Lee, New Jersey. During this consensually recorded meeting (audio and video), Customer C.K. provided Cooperating Witness One with the requested documents.

c. On or about December 8, 2010, at the Young-Kyu Park Fort Lee Office, Cooperating Witness One provided defendant Young-Kyu Park with Customer S.K.'s documents for his "passport job." This meeting was consensually recorded (audio and video).

d. On or about December 9, 2010, Cooperating Witness One met defendant Young-Kyu Park at the Young-Kyu Park Fort Lee Office. This meeting was consensually recorded (audio). During this meeting, Cooperating Witness One retrieved from defendant Young-Kyu Park an altered and fraudulently obtained Form I-797 in Customer S.K.'s name and S.K.'s passport that had been altered with a new expiration date. During the meeting, defendant Young-Kyu Park reviewed the altered passport and stated, in substance and in part, "you will need to charge \$300 more. I do not keep the stamp at home. Why would I keep it at home? Under the recent circumstances, my heart trembles when I go get the stamp" Your Affiant believes that during this consensually recorded conversation defendant Young-Kyu Park was referring to a consular seal that he uses to alter the expiration dates on his Customers' passports.

e. On or about December 9, 2010, Cooperating Witness One met Customer S.K. This meeting was consensually recorded (audio and video). During this meeting, Cooperating Witness One delivered to Customer S.K. the fraudulent documents that defendant Young-Kyu Park had altered, as described above. Later that day, defendant Young-Kyu Park called Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, defendant Young-Kyu Park asked if Cooperating Witness One was on his/her way to the Wayne, New Jersey NJMVC office. Cooperating Witness One stated that he/she was taking the customer to the NJMVC. Defendant Young-Kyu Park advised Cooperating Witness One to tell Customer S.K. that he needed to memorize the business name, business address, home phone number, and occupation that were provided on the manufactured documents. Thereafter, on that same date, Customer S.K. entered the Wayne, New Jersey NJMVC office and, using the manufactured documents that he had obtained from defendant Young-Kyu Park, fraudulently obtained a New Jersey driver's license. Customer S.K. then gave Cooperating Witness One approximately \$2,500 in cash for the manufactured documents that defendant Young-Kyu Park had prepared.

f. On or about December 9, 2010, defendant Young-Kyu Park called Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, Cooperating Witness One told defendant Young-Kyu Park that the job was done. Defendant Young-Kyu Park asked if "they" [the

NJMVC] asked many questions. Cooperating Witness One replied that the NJMVC took Customer S.K.'s documents to the back office and asked Customer S.K. for his social security number again. On or about the same date, during a consensually recorded meeting, Cooperating Witness One gave defendant Young-Kyu Park approximately \$2,500 Cooperating Witness One had received from Customer S.K.

g. After Cooperating Witness One obtained the altered Form I-797 from defendant Young-Kyu Park, as described above, law enforcement officers obtained a copy of the document from Cooperating Witness One. Your Affiant has reviewed this Form I-797, which form contains a receipt number (a unique number that corresponds to an individual person). Your Affiant knows that the receipt number on this Form I-797 corresponds to another individual from India who has a different date of birth than Customer S.K., who is from South Korea. Customer S.K. entered the United States legally on January 30, 1993 as an F-1 student and stayed in the United States past the visa's expiration date. He is currently residing in the United States illegally.

6. Customer H.L.

a. On or about December 10, 2010, an individual contacted Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, the individual sought to obtain a driver's license for another individual with the initials H.L. (hereinafter "Customer H.L."). The individual stated that Customer H.L. was ordered deported, and she was afraid to fly. The caller further explained that Customer H.L. had a valid driver's license from Washington, but would like a New Jersey driver's license. Cooperating Witness One explained that Customer H.L. needed to provide a copy of Customer H.L.'s passport, H.L.'s Washington license, and a valid New Jersey address. Cooperating Witness One further advised the caller that the cost for the service would be approximately \$3,000, and that a deposit of approximately \$1,000 would be required.

b. On or about December 11, 2010, Confidential Informant One obtained the requested documents from Customer H.L.

c. On or about December 15, 2010, during a consensually recorded meeting, Cooperating Witness One delivered a copy of Customer H.L.'s passport, her Washington state license, and a New Jersey address to defendant Defendant Young-Kyu Park so he could prepare the Form I-797 and a counterfeit bank statement

for Customer H.L. Your Affiant knows that the bank statement was necessary to establish Customer H.L.'s residency in New Jersey.

d. On or about December 16, 2010, during a consensually recorded meeting, Cooperating Witness One picked up an altered and fraudulently obtained Form I-797 and bank statement, both in H.L.'s name, from defendant Young-Kyu Park. Later that day, Cooperating Witness One drove Customer H.L. to a NJMVC, where she used these fraudulent documents to obtain a New Jersey driver's license. On or about the same date, Customer H.L. gave Cooperating Witness One approximately \$2,000 for the fraudulent documents and the driver's license. Later that same day, during a consensually recorded meeting, Cooperating Witness One gave defendant Young-Kyu Park approximately \$2,000 for the documents that he manufactured and provided for Customer H.L.

e. After Cooperating Witness One obtained the altered Form I-797 from defendant Young-Kyu Park, as described above, law enforcement officers obtained a copy of the document from Cooperating Witness One. Your Affiant has reviewed this Form I-797, which form contains a receipt number. Your Affiant knows that the receipt number on this Form I-797 corresponds to another individual from India who has a different date of birth than Customer H.L., who is from South Korea. Customer H.L. is from South Korea and was ordered deported from the United States (Blaine, Washington) on January 6, 2010 and is currently residing in the United States illegally.

7. Customer W.O.Y.

a. On or about December 21, 2010, an individual with the initials W.O.Y. (hereinafter "Customer W.O.Y.") contacted Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, Customer W.O.Y. stated that she wanted to obtain fraudulent documents to apply for and obtain a New Jersey driver's license.

b. On or about December 28, 2010, during a consensually recorded meeting between Cooperating Witness One and Customer W.O.Y., Customer W.O.Y. gave approximately \$1,000 in cash to Cooperating Witness One for a falsified Form I-797. Customer W.O.Y. also provided Cooperating Witness One with a copy of a bank statement and a copy of Customer W.O.Y.'s Korean passport. Later that day, during a consensually recorded meeting, Cooperating Witness One provided Customer W.O.Y.'s documents and approximately \$1,000 in cash to defendant Young-Kyu Park.

c. On or about December 29, 2010, Cooperating Witness One called defendant Young-Kyu Park over the Cooperating Witness One Facility. During this consensually recorded conversation, defendant Young-Kyu Park told Cooperating Witness One to "come by at 1:30," and that "it's ready. I'll leave it on the desk [at the Young-Kyu Park Fort Lee Office]. Take it. I'll write [W.O.Y.'s name]. I'll leave it on top with the name [W.O.Y.'s name] on it. So take it." On or about the same date, Cooperating Witness One picked up the falsified documents for Customer W.O.Y. from the Young-Kyu Park Fort Lee Office. Cooperating Witness One retrieved an altered and fraudulently obtained Form I-797 in W.O.Y.'s name, a copy of which form Cooperating Witness One provided to law enforcement before Cooperating Witness One provided it to Customer W.O.Y.

d. On or about January 4, 2011, Customer W.O.Y. obtained a New Jersey driver's license using the falsified document provided by defendant Young-Kyu Park. On or about that same date, customer W.O.Y. gave Cooperating Witness One approximately \$1,500 in cash for the services provided by defendant Young-Kyu Park. Later that day, Cooperating Witness One spoke to defendant Young-Kyu Park over the Cooperating Witness One Facility. During this consensually recorded conversation, defendant Young-Kyu Park asked "[i]s everything all right? What happened with the last DL case?" Cooperating Witness One replied, "Yes, we got it done today." Defendant Young-Kyu Park then asked Cooperating Witness One, "Have you gotten any other calls for new cases?" and Cooperating Witness One responded "No, not really." Defendant Young-Kyu Park mentioned that he planned to hire another person to work in the office with him, but stated that he did not want the new employee to know about his NJMVC business.

e. On or about January 5, 2011, during a consensually recorded meeting, Cooperating Witness One gave defendant Young-Kyu Park approximately \$1,500 from Customer W.O.Y. and returned the original Form I-797 that Customer W.O.Y. had used to obtain a driver's license back to defendant Young-Kyu Park for destruction.

f. After Cooperating Witness One obtained the altered Form I-797 from defendant Young-Kyu Park, as described above, law enforcement officers obtained a copy of the document from Cooperating Witness One. Your Affiant has reviewed this Form I-797, which form contains a receipt number. Your Affiant knows that the receipt number on this Form I-797 corresponds to an individual from India who has a different date of birth than Customer W.O.Y., who is from South Korea. Customer W.O.Y.

entered the United States on March 10, 2005 on a B-1 business visa. Customer W.O.Y. stayed in the United States past the expiration date on her visa. She is currently in the United States illegally.

Defendants Soong-Young Park, Hanna Park, & Yang-Gon Kim

8. On or about March 29, 2011, over the First Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Soong-Young Park. During this intercepted conversation, defendant Young-Kyu Park stated, in substance and in part, "I also have two cases [driver's license Customers] tomorrow." Later during the conversation, defendant Young-Kyu Park stated, in substance and in part, "Anyway, I have several cases so I will prepare the documents and have the guy go there with it. If I make this running like this, I think I will do it just until June, if it runs good just like now."

9. On or about March 30, 2011, over the First Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Soong-Young Park. During this intercepted conversation, the following conversation ensued, in substance and in part [YKP = Young-Kyu Park and Soong-Young Park = SYP]:

SYP: Yes, honey.

YKP: Uhh. I completed work for two people.

SYP: Oh, you did?

YKP: Seven, it is seven, and where should I deposit [the money]?

SYP: Oh, seven? Hmm.

YKP: Deposit in the Citibank. I did it into Citibank yesterday, right?

SYP: Hold it with you. . . . Why don't you deposit it next month? You don't know about Wells Fargo [account], right?

* * * *

SYP: Deposit in the Chase bank.

YKP: Wells Fargo?

SYP: There is Wells Fargo, deposit in the Chase bank. That is fine.

YKP: Should I divide into Chase and Wells Fargo?

SYP: No, deposit \$7,000 in the Chase bank. It is fine there. There was no problem at the Chase bank.

YKP: I did it a few days ago, ok, I got it.

SYP: You should move around here and there [cash deposits], go to different place.

YKP: Ok, I see it. Wells Fargo. I will deposit in the Chase bank. To deposit cash. . . . I have to think about it. Ok, I won't do it in the Citibank but deposit in the Chase bank.

SYP: Ok, that is good.

10. On or about March 30, 2011, over the First Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Soong-Young Park. During this intercepted conversation, defendant Young-Kyu Park stated that he had deposited approximately \$7,000 into a Chase account. Defendant Soong-Young Park advised defendant Young-Kyu Park to make the next deposit into a Wells Fargo account.

11. On or about April 2, 2011, a law enforcement officer observed defendant Young-Kyu Park with a Customer at the NJMVC office in Newark, New Jersey. Approximately one hour later, over the First Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Soong-Young Park. During this intercepted conversation, defendant Young-Kyu Park stated that he intended to deposit approximately \$3,000 and asked defendant Soong-Young Park into which account he should deposit the money. Defendant Soong-Young Park instructed defendant Young-Kyu Park to deposit the money into a Bank of America account because Citibank is "strict."

12. On or about April 2, 2011, over the First Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Soong-Young Park. During this intercepted conversation, defendant Young-Kyu Park asked if she had read the article in the newspaper. Defendant Young-Kyu Park explained, in substance and in part, that a broker was arrested in California or New Mexico and the investigation is being expanded to New York and Georgia. Defendant Young-Kyu Park stated that the situation was serious and wondered if he should stop his driver's license scheme. Young-Kyu Park stated advertising his services in newspapers was risky, and Soong-Young Park agreed.

13. Defendant Young-Kyu Park's Hasty Departure from New Jersey: Customers H.B. & I.L.

a. In or around April 2011, two of defendant Young-Kyu Park's customers were arrested when they attempted to obtain driver's licenses through the use of fraudulent documents. Thereafter, defendant Young-Kyu Park left New Jersey and then traveled to the West Coast, where he continued to operate the Park Criminal Enterprise. Defendant Young-Kyu Park used several brokers to fraudulently obtain driver's licenses for Customers in

New Jersey. To ensure that the criminal enterprise continued in New Jersey, defendant Young-Kyu Park gave blank Forms I-797 to Cooperating Witness One.

b. On or about March 31, 2011, at the NJMVC office in North Bergen, New Jersey, an individual with the initials I.L. (hereinafter "Customer I.L.") was escorted into the office by defendant Young-Kyu Park. After entering the NJMVC office, Customer I.L. presented a counterfeit Korean passport and an altered Form I-797. Thereafter, Customer I.L. was arrested. The passport and the Form I-797 were analyzed by a law enforcement laboratory. The passport was determined to be genuinely issued but altered, and the Form I-797 in the name of Customer I.L. was determined to be a genuine form but altered.

c. On or about April 14, 2011, a law enforcement officer observed and video recorded defendant Young-Kyu Park meet and escort an individual with the initials H.B. (hereinafter "Customer H.B.") to a NJMVC office in North Bergen, New Jersey. After Customer H.B. entered the NJMVC office, she provided certain documents to NJMVC officials. Thereafter, over the First Young-Kyu Park Target Facility, Customer H.B. called defendant Young-Kyu Park. During this intercepted conversation, Customer H.B. stated that a supervisor was examining her passport and discussing things with other NJMVC employees. Approximately fifteen minutes later, defendant Young-Kyu Park called Cooperating Witness One, stating he was worried because it was taking too long and did not feel comfortable. At approximately 9:51 a.m., defendant Young-Kyu Park called Customer H.B. During this intercepted conversation, Customer H.B. advised that she had been arrested. At approximately 10:09 a.m., during a subsequent phone conversation with defendant Young-Kyu Park, Customer H.B. stated that she would not implicate defendant Young-Kyu Park.

d. On or about April 14, 2011, defendant Young-Kyu Park met Cooperating Witness One and defendant Ki-Sok Kim in Ridgely, New Jersey. A law enforcement officer observed and video recorded this meeting. In addition, Cooperating Witness One consensually recorded (audio) this meeting. During this consensually recorded conversation, they discussed the arrest of Customer H.B. and defendant Young-Kyu Park discussed his need to leave the area.

e. On or about April 15, 2011, over the First Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Soong-Young Park. During this intercepted conversation, defendant Young-Kyu Park asked defendant Soong-Young Park if she had seen the Internet that morning, and he was

informing her so she would not worry. Defendant Young-Kyu Park explained that the online article concerned two individuals who had been arrested trying to use immigration documents to obtain driver's licenses. Defendant Young-Kyu Park told defendant Soong-Young Park that he knew the woman [Customer H.B.] but not the man [Customer I.L.]. Defendant Young-Kyu Park stated that Director Kim [defendant Ki-Sok Kim] would hire an attorney for Customer H.B.

f. On or about April 18, 2011, defendant Young-Kyu Park spoke with Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, defendant Young-Kyu Park stated that defendant Ki-Sok Kim had the documents [according to Cooperating Witness One, the "documents" defendant Young-Kyu Park was referring to were blank Forms I-797 that they used to fraudulently obtain driver's licenses]. Defendant Young-Kyu Park also stated that Cooperating Witness One could use defendant Young-Kyu Park's computer to make the documents [the Forms I-797].

g. On or about April 22, 2011, Cooperating Witness One met defendant Ki-Sok Kim in Fort Lee, New Jersey. According to Cooperating Witness One, defendant Ki-Sok Kim gave Cooperating Witness One a hand-drawn map of an apartment located in Palisades Park, New Jersey. Defendant Ki-Sok Kim controlled a portion of the apartment. According to Cooperating Witness One, defendant Ki-Sok Kim stated that the documents, namely, the blank Forms I-797, were located inside this residence. Later that day, Cooperating Witness One entered that location, wearing a recording device (audio and video). After entering the apartment, Cooperating Witness One located a blue bag that contained, among other things, approximately 26 blank Forms I-797A and multiple stamps (used to fraudulently extend passports). Thereafter, Cooperating Witness One provided the contents of the bag to law enforcement officers, who inventoried and photographed these items. According to Cooperating Witness One, on or about April 14, 2011, because of the arrest of Customer H.B., defendant Young-Kyu Park moved out of New Jersey but directed Cooperating Witness One and defendant Ki-Sok Kim to continue the scheme using the Forms I-797 that Cooperating Witness One had recovered from the apartment that defendant Ki-Sok Kim controlled.

h. On or about July 3, 2011, defendant Young-Kyu Park returned to New Jersey and, thereafter, a law enforcement officer observed and video recorded him at an airport in New York and later in the area of Fort Lee, New Jersey. On or about July 7, 2011, at defendant Young-Kyu Park's direction, Cooperating Witness One retrieved a briefcase from another individual and

brought the briefcase to defendant Young-Kyu Park in Fort Lee, New Jersey. According to Cooperating Witness One, in his/her presence, defendant Young-Kyu Park opened the briefcase and removed approximately 250 blank Forms I-797. According to Cooperating Witness One, defendant Young-Kyu Park took approximately 200 blank Forms I-797 and shipped them, via Federal Express, to a relative in Los Angeles, California (hereinafter the "Relative"). A law enforcement officer observed and video recorded defendant Young-Kyu Park and Cooperating Witness One travel to a Federal Express office in Palisades Park, New Jersey.

14. On or about September 9, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Soong-Young Park. During this intercepted conversation, defendant Young-Kyu Park stated, in substance and in part, that defendant Boo Park would visit defendant Young-Kyu Park in Los Angeles, California. Defendant Young-Kyu Park stated that defendant Boo Park would be bringing documents to make passports. Defendant Young-Kyu Park further stated that Cooperating Witness One intended to install a new font on defendant Young-Kyu Park's computer, located in defendant Young-Kyu Park's apartment in Las Vegas, Nevada. According to Cooperating Witness One, the font was installed to allow defendant Young-Kyu Park to use the computer to alter Forms I-797.

15. On or about September 17, 2011, over the Second Young-Kyu Park Target Facility, defendant Soong-Young Park called defendant Young-Kyu Park. During this intercepted conversation, defendant Young-Kyu Park stated, in substance and in part, that the DMVs in Nevada are extremely easy, the documents are just for show, and the personnel are friendly. Defendant Young-Kyu Park stated if he lowered his price [for fraudulently providing driver's licenses], advertised in Nevada, and obtained approximately twenty or thirty customers, then he wanted to use defendants Jong-Hyek Park and Yang-Gon Kim to work for him in Las Vegas, Nevada. Defendant Young-Kyu Park added that he wanted to expand into Virginia. Defendant Young-Kyu Park remarked that he was losing customers because his price was too high. In addition, defendant Young-Kyu Park stated that he met a DMV broker in Las Vegas, Nevada, later determined to be defendant Young-Bae Gu, who was willing to work with him.

16. On or about September 17, 2011, over the Second Young-Kyu Park Target Facility, defendant Yang-Gon Kim called defendant Young-Kyu Park. During this intercepted conversation, defendant Young-Kyu Park instructed defendant Yang-Gon Kim to place more advertisements in newspapers [to recruit Customer who were

otherwise unable to lawfully obtain driver's licenses]. Defendant Yang-Gon Kim commented that he was posting Internet ads. Defendant Young-Kyu Park stated that the job of obtaining driver's licenses for others was very easy because the people there [in Las Vegas, Nevada] were very friendly. Defendant Young-Kyu Park lamented that he wished he could bring Customers from California to Nevada by lowering the price. Defendant Young-Kyu Park stated that four places [Nevada Department of Motor Vehicle offices] existed in Las Vegas, Nevada where Customers could obtain driver's licenses. Defendant Young-Kyu Park reported that he had spoken with another driver's license broker, and defendant Young-Kyu Park had concluded that a price of approximately \$3,500 to \$4,000 for a driver's license was too high, and, if defendant Young-Kyu Park lowered his price to approximately \$2,000 or \$2,500, he could obtain more Customers. Defendant Yang-Gon Kim asked if defendant Young-Kyu Park wanted him to call the newspapers to place advertisements himself. Defendant Young-Kyu Park stated that he wanted defendant Yang-Gon Kim to make documents for certain driver's license cases.

17. On or about September 20, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Soong-Young Park. During this intercepted conversation, defendant Young-Kyu Park stated, in substance and in part, that a passport would be delivered to their California home on September 21, 2011. Defendant Young-Kyu Park instructed defendant Soong-Young Park to take possession of the package, and she stated that she understood his instruction. As part of this investigation, the Federal Bureau of Investigation obtained records from Federal Express based on a federal Grand Jury subpoena. The Federal Express records reveal that on or about September 20, 2011, "Peter Park," [who is known by Your Affiant to be defendant Boo Park] shipped a Federal Express envelope from New Jersey to "Soong Park" [known by Your Affiant to be defendant Soong-Young Park] at her residence in Los Angeles, California. The envelope was delivered on or about September 21, 2011.

18. On or about September 22, 2011, over the Second Young-Kyu Park Target Facility, defendant Soong-Young Park called defendant Young-Kyu Park. During this intercepted conversation, defendant Soong-Young Park stated, in substance and in part, that she had received a package from New Jersey. Defendant Young-Kyu Park instructed defendant Soong-Young Park to keep the package at the house. Defendant Young-Kyu Park then advised her that he took one customer this morning for \$1,500 and learned that he could obtain a three or four year driver's license. Defendant Young-Kyu Park further stated he planned to travel to Los Angeles, California the following day.

19. On or about October 14, 2011, over the Cooperating Witness One Facility, defendant Young-Kyu Park and Cooperating Witness One had a conversation. During this intercepted conversation, defendant Young-Kyu Park stated, in substance and in part, that it was easier for him to work in Las Vegas, Nevada because, although his wife [defendant Soong-Young Park] knows what he is doing, defendant Young-Kyu Park felt awkward fielding customer calls in front of his wife in California.

20. Customer S.W.K.

a. On or about November 3, 2011, defendant Young-Kyu Park sent an email from the Third Young-Kyu Park Email Account to defendant Yang-Gon Kim. Defendant Young-Kyu Park copied defendant Jong-Hyek Park on the email. The email's subject line stated, "passport pickup." In this email, defendant Young-Kyu Park stated, "And Yang-Gon a week later (I will telephone) when you get passport (original) passport copy one photo \$400 cash from your aunt [defendant Soong-Young Park] as soon as you get it deliver it to [a co-conspirator] however pay the cash upon receipt [after the co-conspirator altered the passport]. I will tell [the co-conspirator] that my nephew [defendant Yang-Gon Kim] will deliver it."

b. On or about November 4, 2011, over the Second Young-Kyu Park Target Facility, defendant Soong-Young Park called defendant Young-Kyu Park. During this intercepted conversation, defendant Soong-Young Park stated, in substance and in part, that approximately \$500 had been deposited into a Bank of America account. Defendant Soong-Young Park further stated that she had received two checks in the mail, each for \$500, and a copy of a person's passport. Defendant Young-Kyu Park instructed defendant Soong-Young Park to have defendant Hanna Park scan a copy of the passport and two photographs and email the documents to defendant Young-Kyu Park. Defendant Soong-Young Park added that a copy of a U.S. visa was also in the package. Defendant Young-Kyu Park asked how the documents were organized, and defendant Soong-Young Park replied that one page from the passport copy was stapled to the copy of the U.S. visa. Defendant Young-Kyu Park then instructed defendant Soong-Young Park to have defendant Hanna Park scan and email the passport and U.S. visa to him. Defendant Young-Kyu Park stated that he had previously sent an email to defendant Hanna Park regarding this matter. Defendant Young-Kyu Park instructed defendant Soong-Young Park to issue a \$400 check to a newspaper for an advertisement. Defendant Soong-Young Park stated that she remembered sending a \$350 check to the newspaper in the past. Defendant Young-Kyu Park instructed defendant Soong-Young Park to write "New Jersey driver's license

advertisement" on the check; however, he then corrected himself and instructed her to write "Nevada driver's license" on the check.

c. On or about November 4, 2011, defendant Hanna Park emailed scanned documents to defendant Young-Kyu Park, which documents were received in the Third Young-Kyu Park Email Account. The email's subject line stated, "scanned docs." The scanned documents attached to the email included the following:

(1) a photocopy of the biographical page and photograph of a Korean passport in the name of an individual with the initials S.W.K. (hereinafter "Customer S.W.K."); and

(2) a photocopy of a U.S. visa in the name of Customer S.W.K.

d. On or about November 9, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Yang-Gon Kim. During this intercepted call, the following conversation ensued, in substance and in part [YKP = defendant Young-Kyu Park and YGK = Yang-Gon Kim]:

YKP: Hey, Yang-Gon.

YGK: Yes.

YKP: Did you see the email that I sent you about delivering the passport to [another co-conspirator]?

YGK: Yes.

YKP: Get the passport from your aunt [defendant Soong-Young Park] today-

YGK: Ah, yes.

YKP: Receive the passport and \$400 but just pass on the passport-

YGK: Yes.

YKP: [The co-conspirator] says that he can do it now-he called- . . . I said it needs to be passed on to [the co-conspirator], right?

YGK: Yes-yes.

YKP: Get that passport from your aunt [defendant Soong-Young Park] and receive the passport and \$400 and-pass on the passport and picture(s)-

YGK: Yes.

YKP: It's okay to give the money after it's done.

YGK: Yes.

YKP: If you deliver it today, he'll probably have the passport done for you around tomorrow.

YGK: Yes.

YKP: Give me a call when you receive the passport.
I'll tell you where to send it.
YGK: Ah, yes. I understand.
YKP: I called your aunt [defendant Soong-Young Park]
but she's not picking up-might be at the sauna.
YGK: She already asked about it.
YKP: I was going to have your aunt [defendant Soong-
Young Park] send it but he said he couldn't do the
job at that time-that's why I didn't pass it on to
him.
YGK: Yeah-yeah.
YKP: If your aunt [defendant Soong-Young Park] is at
the sauna-go in the house and just get the
passport . . . pass on the passport. . . . When
she does-either to you or me-then I'll tell her to
deliver the passport today so-I gave you [the
other co-conspirator's] number, right?
YGK: Yeah-at that time-you wrote it in an email.
YKP: If you don't know, you can just ask me. Do it for
me because your aunt [defendant Soong-Young Park].
. . . She's coming to Las Vegas tomorrow.
YGK: Ah, is that right. . . .

e. On or about November 12, 2011, defendant Young-Kyu Park sent an email from the Third Young-Kyu Park Email Account to Cooperating Witness One. The email's subject line stated, "[Customer S.W.K. and Customer S.W.K.'s son's case]." In this email, defendant Young-Kyu Park directed Cooperating Witness One to meet Customer S.W.K. at a location in Leonia, New Jersey on November 15, 2011 and to escort the Customer to a NJMVC office on November 16, 2012. Defendant Young-Kyu Park indicated that Customer S.W.K.'s passport was sent from Los Angeles, California to New Jersey and scheduled to arrive on November 15, 2011. In red font, defendant Young-Kyu Park typed: "Passport is for use only never give to that person [i.e., Customer S.W.K.]. As soon as finished using must send to LA." Defendant Young-Kyu Park directed Cooperating Witness One to send the passport, after the driver's license was obtained, to his wife, defendant Soong-Young Park at their Los Angeles, California residence by Federal Express.

f. On or about November 15, 2011, Federal Express delivered an envelope, sent by "David Kim" [defendant Yang-Gon Kim] in Los Angeles, California, to ITC [Iron Trading Corp.] at the Young-Kyu Park Fort Lee Office. Later that day, Cooperating Witness One retrieved the envelope from defendant Ki-Sok Kim at the Young-Kyu Park Fort Lee Office. This meeting was consensually recorded (audio and video). Cooperating Witness One

provided the Federal Express envelope and the contents of the envelope to law enforcement. The envelope included a photocopy of an unaltered Korean passport with an expiration date of October 29, 1998 in the name of Customer S.W.K. and a counterfeit Korean passport in the name of Customer S.W.K. with expiration date of September 19, 2017. The envelope was taken into evidence and photographs were made of the photocopy of the unaltered Korean passport and the counterfeit Korean passport in the name of Customer S.W.K.

g. On or about November 16, 2011, Cooperating Witness One escorted Customer S.W.K. to a NJMVC office in Somerville, New Jersey, where he obtained a New Jersey driver's license. Customer S.W.K. then paid Cooperating Witness One approximately \$3,000 in cash. Thereafter, at the direction of defendant Young-Kyu Park, Cooperating Witness One deposited approximately \$2,500 into the Hyeun-Jin Park Chase Account.

h. On or about November 16, 2011, at the direction of defendant Young-Kyu Park, Cooperating Witness One sent, by Federal Express, the counterfeit Korean passport in the name of Customer S.W.K. to defendant Soong-Young Park.

21. Customer R.S.K.

a. On or about November 1, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Ki-Sok Kim. During this intercepted conversation, defendant Young-Kyu Park advised defendant Ki-Sok Kim that he would receive a passport on Thursday, November 3, 2011. Defendant Young-Kyu Park stated that the passport needed to be extended [*i.e.*, altered] to permit the customer, an individual with the initials R.S.K. (hereinafter "Customer R.S.K."), to obtain a Virginia driver's license.

b. On or about November 3, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Ki-Sok Kim. During this intercepted conversation, defendant Ki-Sok Kim informed defendant Young-Kyu Park that a UPS parcel had arrived approximately thirty minutes earlier. Defendant Ki-Sok Kim also reported that the passport and the \$500 money order arrived together. Defendant Young-Kyu Park asked defendant Ki-Sok Kim to scan the front page and the extension page of the passport and email it to defendant Young-Kyu Park. Defendant Young-Kyu Park then directed defendant Ki-Sok Kim to provide the documents, including the passport, to Cooperating Witness One because he/she had the extension stamps [used by

defendant Young-Kyu Park and his co-conspirators to fraudulently alter passports].

c. On or about November 3, 2011, defendant Ki-Sok Kim sent an email to defendant Young-Kyu Park, which email was received in the First Young-Kyu Park Email Account. The email's subject line stated, "[R.S.K.] passport." In the email, defendant Ki-Sok Kim wrote: "Sending [you] the scan. (Made the deposit). K. Kim." The email contained three attachments consisting of a Korean passport in the name of Customer R.S.K. The first attachment was page two of the passport containing Customer R.S.K.'s biographical data and photograph). The second attachment was pages four and five of the passport (blank), and the third attachment was pages six and seven of the passport (blank).

d. On or about November 3, 2011, defendant Young-Kyu Park sent an email from the Third Young-Kyu Park Email Account to Cooperating Witness One. In this email, defendant Young-Kyu Park stated the following, in substance and in part: "Not sure if [you] have received [Customer R.S.K.'s] passport from Director Kim [defendant Ki-Sok Kim]. Must receive the passport and extend it. When extending passport . . . [sic] set the period to 11/3/2011-11/2/2016 . . . [sic] issue date should be 11/2/2011." Later in the same email, defendant Young-Kyu Park directed Cooperating Witness One to send the passport, via Federal Express, to Homan Lee [defendant Ho-Man Lee] at [defendant Ho-Man Lee's address in Alexandria, Virginia]. On the same date, defendant Young-Kyu Park sent an email from the Third Young-Kyu Park Email Account to defendant Ho-Man Lee. In this email, defendant Young-Kyu Park stated the following, in substance and in part: "Master Lee. Passport extension for [Customer R.S.K.] who will do the DL on 28th day [of November, 2011] [it] should arrive at Master Lee's house from New Jersey middle of next week. When [you] get it please bring it to [Customer R.S.K.] on the 28th. [You] can give the passport to [Customer R.S.K.] since it belongs to [him]."

e. On or about November 4, 2011, over the Cooperating Witness One Facility, defendant Ki-Sok Kim called Cooperating Witness One. During this consensually recorded conversation, defendant Ki-Sok Kim stated that defendant Young-Kyu Park had instructed defendant Ki-Sok Kim to forward a passport to Cooperating Witness One. Later that day, Cooperating Witness One met defendant Ki-Sok Kim in Leonia, New Jersey. During this consensually recorded meeting (audio and video), defendant Ki-Sok Kim gave Cooperating Witness One a Korean passport in the name of Customer R.S.K. Later that day, Cooperating Witness One

presented the passport in the name of Customer R.S.K. to a law enforcement officer, who photographed the document as received by defendant Ki-Sok Kim. Cooperating Witness One then altered the passport, as previously directed by defendant Young-Kyu Park, and again presented it to a law enforcement officer, who photographed the altered document. Thereafter, Cooperating Witness One sent the passport, via Federal Express, to defendant Ho-Man Lee in Virginia.

f. On or about November 15, 2011, over the Second Young-Kyu Park Target Facility, defendant Hanna Park called defendant Young-Kyu Park. During this intercepted conversation, defendant Young-Kyu Park stated, in substance and in part, "I got the email. Only two sheets arrived?" Defendant Hanna Park confirmed that she received two sheets. Defendant Young-Kyu Park then asked about the Bank of America deposits, and defendant Hanna Park confirmed a \$500 deposit on November 14, 2011 and a \$3,000 deposit on November 15, 2011. She also reported that the balance in the account at the time was approximately \$17,188. Defendant Hanna Park, who could be heard typing on a keyboard, also confirmed previous deposits of approximately \$2,000, \$3,800, and \$2,700.

g. On or about November 15, 2011, defendant Hanna Park emailed scanned documents to defendant Young-Kyu Park, which documents were received in the Third Young-Kyu Park Email Account. The email's subject line stated, "document scanned." The scanned documents attached to the email included the following: (1) a photocopy of a Korean passport biographical page with photograph for Customer R.S.K.; (2) a Tennessee driver's license in the name of Customer R.S.K.; (3) a U.S. visa in the name of Customer R.S.K.; and (4) a Form I-797 in the name of Customer R.S.K.

h. In or around late November 2011, Customer R.S.K. obtained a driver's license issued by the Commonwealth of Virginia.

22. On or about December 6, 2011, defendant Hanna Park sent an email to defendant Young-Kyu Park, which email was received in the Third Young-Kyu Park Email Account. The email's subject line stated, "passport," and contained three attachments of a passport issued to an individual with the initials N.I.K. (hereinafter "Customer N.I.K."). Customer N.I.K. obtained a New Jersey driver's license on or about December 12, 2011 at a NJMVC office in Newark, New Jersey.

23. On or about December 14, 2011, defendant Young-Kyu Park sent an email from the Third Young-Kyu Park Email Account to defendant Hanna Park. In this email, defendant Young-Kyu Park stated the following in substance and in part: "By next week Daddy will deposit about \$30,000 to mom's account . . . [sic] Going forward, [I] plan on depositing into your account. Therefore, send Daddy all of your checking account info [in English]. Bank name. Account number. Account hold [in English] [holder] name. Account hold [in English] [holder] address. State [in English] bank account opened. Send telephone number. And what's the current balance on savings and checking account. Daddy's thought is by next February will deposit about \$200-\$300,000 into your account . . . [sic] After that for two to three months we'll deposit about \$300-\$400,000 to mom's account [to] buy the house cash. Until then [I] hope the LA house and the Bayside house [New York] are problem free." Later in the email, defendant Young-Kyu Park stated the following, in substance and in part: "Early January next year [I will] go to Vegas again to open an office with Jong-Hyek [defendant Jong-Hyek Park] and [another individual]. Jong-Hyek and [the other individual] will do paralegal [in English] work. [This office will do] legal [in English] immigration work and after getting permit for Nevada DMV [in English] license plan. Registration service with Americans, Hispanics, and Korean people. Daddy will give advice from the side"

24. On or about December 28, 2011, defendant Hanna Park sent an email, in response to defendant Young-Kyu Park's email referred to above, to defendant Young-Kyu Park, which email was received in the Third Young-Kyu Park Email Account. The email's subject line stated, "bank acct." In this email, defendant Hanna Park stated the following, in substance and in part [in English]:

Hanna Park

Citibank checking [First Hanna Park Citibank Account]
opened in New York, NY
Routing # [redacted]
Acct # [redacted]

Citibank checking [Second Hanna Park Citibank Account]
opened in Los Angeles, California
Routing # [redacted]
Acct # [redacted]

Wells Fargo checking [Hanna Park Wells Fargo
Checking Account]
opened in CA
Routing # [redacted]
Acct # [redacted]

25. On or about February 3, 2012, defendant Young-Kyu Park sent an email from the Third Young-Kyu Park Email Account to Cooperating Witness One. The email's subject line stated, "new bank account." The email stated the following, in substance and in part: "Going forward please deposit to the below account (to Citibank and a Wells Fargo [sic]). After making the deposit send me a text message on which account the deposit was made to." Defendant Young-Kyu Park included in the email to Cooperating Witness One the bank account information provided by defendant Hanna Park to defendant Young-Kyu Park, as described above.

26. At various times in or around March 2012, Cooperating Witness One met with a law enforcement officer and provided the officer with deposit slips corresponding to cash deposits that he/she had made into various bank accounts at defendant Young-Kyu Park's direction. According to Cooperating Witness One, all of the cash that he/she deposited into these accounts was obtained from Customers of the Park Criminal Enterprise related to the driver's license scheme. These deposit records were taken into evidence and reveal the following:

Approximate Date	Amount	Account
February 28, 2012	\$2,200	Hanna Park Wells Fargo Checking Account
February 29, 2012	\$2,600	Hanna Park Wells Fargo Checking Account
March 6, 2012	\$3,000	Hanna Park Wells Fargo Checking Account
March 12, 2012	\$3,500	Second Hanna Park Citibank Account
March 13, 2012	\$3,500	Hanna Park Wells Fargo Checking Account

Defendant Hyeun-Jin Park

27. According to Cooperating Witness One, defendant Hyeun-Jin Park is defendant Young-Kyu Park's girlfriend, who assists Customers with fraudulently obtaining driver's licenses.

28. **Customer Y.Z.**

a. On or about February 15, 2011, an individual with the initials Y.Z. (hereinafter "Customer Y.Z.") was arrested at the NJMVC office in Wayne, New Jersey after she attempted to obtain a driver's license with an altered passport. According to Cooperating Witness One, Customer Y.Z. was a customer of defendant Young-Kyu Park.

b. On or about February 15, 2011, Customer Y.Z. and defendant Hyeun-Jin Park were apprehended and transported to an office of the United States Immigration and Customs Enforcement-Enforcement and Removal (hereinafter "ICE-ER") in Newark, New Jersey. During an interview with the ICE-ER officers, defendant Hyeun-Jin Park stated that she was present at the Wayne, New Jersey NJMVC office with Customer Y.Z. only to act as an interpreter. Thereafter, federal officers released defendant Hyeun-Jin Park and instructed her to return with proof of lawful status in the United States.

c. On or about February 15, 2011, defendant Young-Kyu Park and Cooperating Witness One spoke over the Cooperating Witness One Facility. During this consensually recorded conversation, Young-Kyu Park stated, in substance and in part, that he had sent defendant Hyeun-Jin Park to a DMV with a customer to obtain a driver's license, and the customer had been arrested. Defendant Young-Kyu Park also stated that defendant Hyeun-Jin Park had been detained but was released. Defendant Young-Kyu Park also stated that immigration officers instructed defendant Hyeun-Jin Park to return to confirm her own status in the country. Defendant Young-Kyu Park stated that he only extended the customer's passport and did not closely examine it. Defendant Young-Kyu Park remarked that he was unsure if the customer had a fake passport made. Defendant Young-Kyu Park also advised that the customer's bail would be approximately \$5,000.

29. **Customer J.I.Y.**

a. On or about August 5, 2011, defendant Young-Kyu Park and Cooperating Witness One spoke over the Cooperating Witness One Facility. During the consensually recorded conversation, defendant Young-Kyu Park instructed Cooperating

Witness One to meet a customer and make a document [a reference to a Form I-797, according to Cooperating Witness One]. Defendant Young-Kyu Park then told Cooperating Witness One to make the document [i.e., the Form I-797], give it to defendant Hyeun-Jin Park, and then to meet the Customer with defendant Hyeun-Jin Park that same day. Defendant Young-Kyu Park instructed Cooperating Witness One to tell the Customer that defendant Hyeun-Jin Park worked for him (defendant Young-Kyu Park) and that she would escort the customer to the NJMVC office in Newark, New Jersey. Defendant Young-Kyu Park then told Cooperating Witness One to meet the Customer near a Burger King in Fort Lee, New Jersey.

b. On or about August 5, 2011, Cooperating Witness One called an individual with the initials J.I.Y. (hereinafter "Customer J.I.Y.") over the Cooperating Witness One Facility. During this consensually recorded conversation, Customer J.I.Y. stated that he had arrived. Cooperating Witness One told Customer J.I.Y. that a female wearing a black shirt was waiting for him, referring to defendant Hyeun-Jin Park, according to Cooperating Witness One. Customer J.I.Y. stated he met the woman. Thereafter, defendant Hyeun-Jin Park escorted Customer J.I.Y. to a NJMVC office in Newark, New Jersey.

c. On or about August 8, 2011, Cooperating Witness One met defendant Hyeun-Jin Park in Fort Lee, New Jersey. This meeting was consensually recorded. According to Cooperating Witness One, during this meeting, defendant Hyeun-Jin Park gave Cooperating Witness One a Form I-797 in the name of Customer J.I.Y. Cooperating Witness One commented that the Form I-797 that he/she had received from defendant Hyeun-Jin Park appeared off-centered. Defendant Hyeun-Jin Park agreed.

d. According to Cooperating Witness One, defendant Hyeun-Jin Park escorted Customer J.I.Y. into a NJMVC; however, the customer was unable to obtain a driver's license.

30. Customer M.Y.K.

a. On or about August 19, 2011, defendant Hyeun-Jin Park sent an email to defendant Young-Kyu Park, which email was received in the Third Young-Kyu Park Email Account. The email's subject line contained a customer's name and phone number (hereinafter "Customer M.Y.K."). In this email, defendant Hyeun-Jin Park wrote the following: "NJ renew [in English]. Expiration 7/20, have social. Received three year DL before. . . ."

b. On or about August 23, 2011, at the direction of defendant Young-Kyu Park, Cooperating Witness One escorted Customer M.Y.K. to a NJMVC office in Newark, New Jersey, where she obtained a New Jersey driver's license using a fraudulently obtained Form I-797.

31. Customer C.H.K.

a. On or about August 22, 2011, defendant Hyeun-Jin Park sent an email to defendant Young-Kyu Park, which email was received in the Third Young-Kyu Park Email Account. The email's subject line contained a customer's name, phone number, and the word "transfer" (hereinafter "Customer C.H.K."). In this email, defendant Hyeun-Jin Park wrote the following: "1. Presently possess Texas [driver's license]. 2, [sic] Live in California, can come to Vegas."

b. According to records from the Nevada Department of Motor Vehicles (hereinafter "Nevada DMV"), Customer C.H.K. obtained a Nevada driver's license on or about December 20, 2011.

c. On or about December 27, 2011, defendant Young-Kyu Park sent an email to himself from the Second Young-Kyu Park Email Account to the Second Young-Kyu Park Email Account. This email's subject line stated, "WAC 97" [a reference to a Form I-797] and contained three attachments of three different Forms I-797 for three customers, including Customer C.H.K. Based on the investigation, Your Affiant knows these Forms I-797 were fraudulent.

32. The Nevada Driver's License Scheme:

a. According to Cooperating Witness One, on or about August 9, 2011, defendant Hyeun-Jin Park moved to Las Vegas, Nevada, where she resided in an apartment with defendant Young-Kyu Park.

b. Beginning in or around August 2011, defendant Young-Kyu Park placed advertisements in Korean newspapers. The advertisement stated the following: "Nevada driver's license (Possible even without social [security card]) New: 1. For people getting driver's license in United States for first time. 2. For people who have long expired United States driver's license Renew and transfer [in English] (same day): NV [in English] For people with NV driver's license or out of state driver's license [a phone number ending 5579 was listed] (hereinafter the "Nevada Advertisement Facility")."

c. On or about August 29, 2011, defendant Young-Kyu Park, using the Second Young-Kyu Park Target Facility, called defendant Hyeun-Jin Park on the Nevada Advertisement Facility. During this intercepted conversation, defendant Hyeun-Jin Park stated that she was receiving many calls from individuals comparing Las Vegas with Seattle. Your Affiant believes that defendant Hyeun-Jin Park was referring to customers who were shopping around for fraudulently obtained driver's license and other immigration services.

d. On or about August 31, 2011, defendant Hyeun-Jin Park, using the Nevada Advertisement Facility, called defendant Young-Kyu Park on the Second Young-Kyu Park Target Facility. During this intercepted conversation, defendant Hyeun-Jin Park explained some of the driver's license regulations for Nevada. Defendant Young-Kyu Park stated they just started their driver's license business in Las Vegas, Nevada, and they needed to check and learn the rules for obtaining driver's licenses.

e. On or about September 3, 2011, defendant Young-Kyu Park, using the Second Young-Kyu Park Target Facility, called defendant Hyeun-Jin Park on the Nevada Advertisement Facility. During this intercepted conversation, defendant Young-Kyu Park asked her if Cooperating Witness One had called her. Defendant Young-Kyu Park stated that he had instructed Cooperating Witness One to deposit approximately \$4,000, and Cooperating Witness One planned to deposit the money into a Bank of America account. Defendant Hyeun-Jin Park responded that a Chase Bank was closer to her. According to records from Chase Bank, on or about September 6, 2011, a \$4,000 cash deposit was posted to the Hyeun-Jin Park Chase Account. According to Cooperating Witness One, he/she made this deposit at the direction of defendant Young-Kyu Park, and Cooperating Witness One provided the deposit to federal agents.

Defendant Jong-Hyek Park

33. On or about September 6, 2011, over the Second Young-Kyu Park Target Facility, defendant Jong-Hyek Park called Young-Kyu Park. During this intercepted conversation, defendant Jong-Hyek Park asked if he could start working for defendant Young-Kyu Park right away, and defendant Young-Kyu Park replied yes. Defendant Young-Kyu Park stated that he planned to commence his business in November 2011, but he had many things to prepare in advance of starting the business. Defendant Jong-Hyek Park stated he wanted to start working for defendant Young-Kyu Park immediately.

34. On or about September 7, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Jong-Hyek Park. During this intercepted conversation, defendant Young-Kyu Park stated that he wanted to finish what they talked about the day before. Defendant Young-Kyu Park further stated that New Jersey driver's licenses were working out the best for him, and, in Nevada, many individuals traveled to Seattle, Washington to obtain driver's licenses there because they can obtain them for only \$800. Defendant Young-Kyu Park noted that he generally charged customers approximately \$2,500 to \$3,000 for a driver's license. Defendant Young-Kyu Park added that if he advertises, then he believed he would obtain additional customers in Nevada. Defendant Young-Kyu Park also discussed his driver's license business in Virginia, stating he used a person called Master Lee [defendant Ho-Man Lee], a broker. In regard to New Jersey driver's license cases, defendant Young-Kyu Park advised that he left the person [Cooperating Witness One] some papers [Forms I-797] so that he could make the documents himself. Defendant Young-Kyu Park added that the person in New Jersey [Cooperating Witness One] was coming to Las Vegas, Nevada later that week. In addition, defendant Young-Kyu Park told defendant Jong-Hyek Park that he (defendant Young-Kyu Park) had to return to Los Angeles, California the following week to assist a customer obtain a driver's license and passport, and he had to find someone to do the job. Defendant Young-Kyu Park also noted that the customer wanted to acquire an E-2 visa. Later during the conversation, defendant Jong-Hyek Park stated that he was ready to start working for defendant Young-Kyu Park right away, and that was why he called the day before. Defendant Young-Kyu Park stated he would help defendant Jong-Hyek Park with his living expenses.

35. On or about September 6, 2011, over the Second Young-Kyu Park Target Facility, defendant Jong-Hyek Park called Young-Kyu Park. During this intercepted conversation, defendant Jong-Hyek Park asked how defendant Young-Kyu Park wanted to make a bank statement. Defendant Young-Kyu Park instructed defendant Jong-Hyek Park to use a certain computer program [that could be used to create, alter, and manipulate documents] and change [i.e., alter] the name on the original statement. Defendant Young-Kyu Park stated that it was better to have a multiple page bank statement that should reflect different balances. Defendant Young-Kyu Park stated that when he had made a bank statement a long time ago, it was made by color printing the form, and it was the same way [method] that they had used to make Forms I-797. Defendant Young-Kyu Park stated that he, defendant Jong-Hyek Park, and Yang-Gon Kim would meet on or about September 25, 2011, and defendant Young-Kyu Park would show them how to work with

Forms I-797. Defendant Young-Kyu Park further instructed defendant Jong-Hyek Park to provide a bank account number so defendant Young-Kyu Park could deposit money for defendant Jong-Hyek Park.

36. On or about November 3, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Jong-Hyek Park. During this intercepted conversation, defendant Young-Kyu Park stated that he awakes everyday at 5:00 a.m. during the week because he receives a call at approximately 5:30 a.m. from New Jersey, and that he is doing approximately twenty cases per week in three places. Defendant Young-Kyu Park stated he reduced his fee for driver's licenses in Las Vegas, Nevada to \$2,000. He further added that he charged approximately \$3,500 for a driver's license in New Jersey and approximately \$3,000 for a driver's license in Virginia. Later during the conversation, defendant Young-Kyu Park asked if defendant Jong-Hyek Park could create another template of a bank statement, and defendant Jong-Hyek Park replied that he would bring one to show defendant Young-Kyu Park. Defendant Jong-Hyek Park asked if defendant Young-Kyu Park could find him some originals of the bar-coded document [a reference to bar codes on Forms I-797 and bank statements].

37. Customer J.L.L.

a. On or about March 6, 2012, defendant Young-Kyu Park, using the First Young-Kyu Park Email Account, sent an email to Cooperating Witness One. The email's subject line stated, "progress list." In this email, defendant Young-Kyu Park directed Cooperating Witness One to meet an individual with the initials J.L.L. (hereinafter "Customer J.L.L.") and to obtain the customer's passport and social security number. Defendant Young-Kyu Park advised that Customer J.L.L. would be charged approximately \$3,500 (with a \$500 down payment). Defendant Young-Kyu Park added that Customer J.L.L., who lived in Pennsylvania, would use a friend's address in New Jersey to obtain a New Jersey driver's license.

b. On or about March 7, 2012, defendant Young-Kyu Park, using the First Young-Kyu Park Email Account, sent an email to defendant Jong-Hyek Park. The email's subject line contained a customer's name [Customer J.L.L.] and "B/S [bank statement, in English] laser print." The email contained six attachments (a six page Wells Fargo bank statement) in the name of Customer J.L.L. Your Affiant believes that a bank statement was needed for Customer J.L.L. to fraudulently establish her residency in New Jersey to obtain a New Jersey driver's license.

c. On or about March 13, 2012, according to records from the NJMVC and Cooperating Witness One, Customer J.L.L obtained a New Jersey driver's license using a fraudulent Form I-797 and a counterfeit Wells Fargo bank statement.

38. Customer C.S.L.

a. On or about March 7, 2012, defendant Young-Kyu Park, using the First Young-Kyu Park Email Account, sent an email to Cooperating Witness One. The email's subject line stated, "progress list and change of schedule." In this email, defendant Young-Kyu Park directed Cooperating Witness One to meet an individual with the initials C.S.L. (hereinafter "Customer C.S.L.") and provide the customer with instructions to go to a Korean restaurant in Virginia on March 14, 2012. Defendant Young-Kyu Park stated Customer C.S.L. would be charged approximately \$3,500 (with a \$500 down payment). Defendant Young-Kyu Park noted that the customer had a Tennessee driver's license that would expire in several days and had an expired passport. Defendant Young-Kyu Park added that the passport would be extended [i.e., altered] and would be sent to defendant Jong-Ho Kim, along with a bank statement.

b. On or about March 9, 2012, defendant Young-Kyu Park, using the First Young-Kyu Park Email Account, sent an email to Jong-Hyek Park. The email's subject line stated, "B/S laser print" [bank statement, in English]. The email contained six attachments (a six page Wells Fargo bank statement) in the name of Customer C.S.L. Your Affiant believes that a bank statement was needed for Customer C.S.L. to fraudulently establish his residency in Virginia to obtain a Virginia driver's license.

c. On or after March 9, 2012, according to records from the Virginia Department of Motor Vehicles, Customer C.S.L. obtained a Virginia driver's license.

Defendants Ki-Sok Kim and Joon-Sang Lee

39. According to Cooperating Witness One, defendant Ki-Sok Kim is a close associate of defendant Young-Kyu Park who worked with him in the Young-Kyu Park Fort Lee Office and engaged in a variety of schemes, including driver's license schemes and immigration schemes.

40. According to Cooperating Witness One, defendant Joon-Sang Lee is an employee of defendant Young-Kyu Park and has known defendant Young-Kyu Park for several years.

41. Customer S.K.L.

a. On or about March 30, 2011, over the First Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Ki-Sok Kim. During this intercepted conversation, defendant Young-Kyu Park instructed defendant Ki-Sok Kim to give a social security card, a copy of a passport and driver's license, and telephone number all belonging to an individual with the initials S.K.L. (hereinafter "Customer S.K.L.") to defendant Joon-Sang Lee. Defendant Young-Kyu Park stated that he was going to a NJMVC office on Saturday [April 2, 2011] and would do the preparation [of the documents for Customer S.K.L.'s driver's license] the following day. Defendant Ki-Sok Kim advised defendant Young-Kyu Park that Customer S.K.L. would also go to the NJMVC office on Saturday. Defendant Ki-Sok Kim also added that he would put all the original documents, including the social security card, in a sealed envelope and send it to defendant Young-Kyu Park via defendant Joon-Sang Lee.

b. On or about March 30, 2011, over the First Young-Kyu Park Target Facility, defendant Joon-Sang Lee called defendant Young-Kyu Park. During this intercepted conversation, defendant Young-Kyu Park asked defendant Joon-Sang Lee if he could bring him (defendant Young-Kyu Park) the documents from defendant Ki-Sok Kim.

c. On or about April 2, 2011, a law enforcement officer observed and video recorded Customer S.K.L. exit the NJMVC office in Newark, New Jersey and enter a vehicle driven by defendant Young-Kyu Park. According to records from the NJMVC, on or about April 2, 2011, Customer S.K.L. was issued a New Jersey driver's license.

42. On or about April 15, 2011, over the First Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Joon-Sang Lee. During this intercepted conversation, they discussed Customers who sought false documents to obtain immigration status [in addition to the driver's license scheme, the Park Criminal Enterprise also helped non-United States citizens obtain favorable immigration actions through false and fictitious documents]. Defendant Joon-Sang Lee stated that he was "making the bank balance." Defendant Young-Kyu Park asked if someone came by, and defendant Joon-Sang Lee stated that the Customer visited. Defendant Young-Kyu Park instructed defendant Joon-Sang Lee to charge the Customer approximately \$200, and defendant Joon-Sang Lee stated that he took \$200. Defendant Young-Kyu Park then asked if defendant Joon-Sang Lee had taken care of an immigration Customer's "new tax documents?," and

defendant Joon-Sang Lee replied that he had. Defendant Young-Kyu Park then stated: "Visa-in regard to the thing, the document of the person getting the visa in Korea-I can tell Director Kim [defendant Ki-Sok Kim] to do it and [have him] go see a CPA and ask [the CPA] to do it." Defendant Joon-Sang Lee agreed. Later that day, over the First Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Joon-Sang Lee. During this intercepted conversation, defendant Young-Kyu Park told defendant Joon-Sang Lee that with regard to an immigration Customer, defendant Joon-Sang Lee should make a Korean bank account balance and send it today. Defendant Young-Kyu Park stated that the student's Form I-20 had expired on April 10th, and he would not get paid if things did not go through. Defendant Young-Kyu Park then restated that the immigration Customer's Form I-20 needed to be transferred to a certain university. Defendant Young-Kyu Park then instructed defendant Joon-Sang Lee to prepare a bank balance, as proof of a bank balance could be used in lieu of a bank statement. Later that day, over the First Young-Kyu Park Target Facility, defendant Joon-Sang Lee called defendant Young-Kyu Park. During this intercepted conversation, defendant Joon-Sang Lee asked about "\$10,000 to \$15,000 in the bank statement." Defendant Young-Kyu Park told defendant Joon-Sang Lee to put down \$18,250, or a similar figure. Defendant Joon-Sang Lee asked whether he should make it Woori Bank or Kook-min Bank. Defendant Young-Kyu Park replied that it did not matter.

43. Customer G.W.L.

a. On or about October 7, 2011, defendant Young-Kyu Park sent an email from his Third Young-Kyu Park Email Account to defendant Ki-Sok Kim. The email's subject line referred to an individual with the initials G.W.L. (hereinafter "Customer G.W.L."). In the email, defendant Young-Kyu Park wrote, "Director Kim. Here is [Customer G.W.L.'s] DL [in English] case. This customer needs to go to MV on 10/11 (Tuesday) but because [Cooperating Witness One] has a different customer on 10/11 meet the customer on 10/10 (Monday) get the documents and must get the documents from [Cooperating Witness One] on 10/10. . . . The day you meet [Customer G.W.L.]: 10/10 (Monday) 7:00 p.m. [in English] will meet at Leonia Dunkin Donuts. Person must bring: 1. passport . . . [sic] 2. NJ [in English] driver's license. 3. social card. 4. debit card . . . [sic] 5. statement. . . . Fee is \$3,500 and will collect \$500 deposit on the day you collect the documents."

b. On or about October 10, 2011, defendant Ki-Sok Kim replied to defendant Young-Kyu Park's email, which email was received in the Third Young-Kyu Park Email Account. In this email, defendant Ki-Sok Kim stated that he planned to assist three customers obtain driver's licenses, including Customer G.W.L.

c. According to records from the NJMVC, on or about October 11, 2011, Customer G.W.L. was issued a New Jersey driver's license.

44. Customer G.J.K.

a. On or about October 7, 2011 defendant Young-Kyu Park sent an email from his Third Young-Kyu Park Email Account to Cooperating Witness One. The email's subject line referred to an individual with the initials G.J.K. (hereinafter "Customer G.J.K."). In this email, defendant Young-Kyu Park directed Cooperating Witness One to meet Customer G.J.K. in Leonia, New Jersey on or about October 12, 2011 to collect a passport ("old and new"), I-94, a denial letter from the Social Security Administration, a debit card, and a bank statement. Furthermore, in the email, defendant Young-Kyu Park directed Cooperating Witness One to escort Customer G.J.K. to a NJMVC office on or about October 13, 2011.

b. On or about October 10, 2011, defendant Ki-Sok Kim replied to defendant Young-Kyu Park's email, which email was received in the Third Young-Kyu Park Email Account. In this email, defendant Ki-Sok Kim stated that he planned to assist three customers obtain driver's licenses, including Customer G.J.K.

c. On or about October 12, 2011, Cooperating Witness One spoke with defendant Ki-Sok Kim over the Cooperating Witness One Facility. During this consensually recorded conversation, defendant Ki-Sok Kim stated that he had the documents and would deliver them to Cooperating Witness One. Later that day, Cooperating Witness One spoke with defendant Young-Kyu Park over the Cooperating Witness One Facility. During this consensually recorded conversation, Cooperating Witness One stated that he/she had obtained the documents from "Director Kim" [defendant Ki-Sok Kim].

d. According to Cooperating Witness One, defendant Ki-Sok Kim brought two passports to Cooperating Witness One in the name of Customer G.J.K. and another customer. According to Cooperating Witness One, at the direction of defendant Young-Kyu

Park, he/she made a Form I-797 in the name of Customer G.J.K. Cooperating Witness One had received blank Forms I-797 from defendant Young-Kyu Park.

e. On or about October 13, 2011, Cooperating Witness One met defendant Ki-Sok Kim in Leonia, New Jersey. A law enforcement officer conducted surveillance and video recorded this meeting. According to Cooperating Witness One, during this meeting, he/she handed defendant Ki-Sok Kim an altered Form I-797 in the name of Customer G.J.K. and the customer's passport. Thereafter, a law enforcement officer conducted surveillance and video recorded defendant Ki-Sok Kim escort Customer G.J.K. into and out of the NJMVC office in Newark, New Jersey.

f. According to records from the NJMVC, on or about October 13, 2011 Customer G.J.K. was issued a New Jersey driver's license.

Defendant Boo Park

45. Customer I.P.

a. On or about September 8, 2011, over the Second Young-Kyu Park Target Facility, defendant Boo Park called defendant Young-Kyu Park. During this intercepted conversation, defendant Boo Park asked how long it took to do a passport [*i.e.*, to alter or produce a fraudulent passport]. Defendant Boo Park stated that defendant Young-Kyu Park had previously helped his cousin, an individual with the initials I.P. (Customer I.P.) and his wife obtain driver's licenses in Seattle, Washington. Defendant Boo Park stated that Customer I.P. had an expired passport. Defendant Young-Kyu Park explained that when the passport has no room for extension stamps, then they rip out the page and attach a page from another passport. Defendant Boo Park then asked about another method of counterfeiting passports, namely, borrowing another person's passport and replacing the picture. Defendant Young-Kyu Park noted that he knew someone in Los Angeles, California who could make passports. Later during the conversation, defendant Young-Kyu Park told defendant Boo Park to bring Customer I.P.'s passport to him (defendant Young-Kyu Park). Defendant Boo Park stated that he had approximately six to seven driver's license cases, and he would bring all the money and driver's license documents (*i.e.*, passports, etc.) when defendant Young-Kyu Park met defendant Boo Park. [During this intercepted conversation, defendant Young-Kyu Park was in Las Vegas, Nevada, and, as described below, defendant Boo Park was planning to travel to Los Angeles, California to meet defendant Young-Kyu Park there on or about September 12, 2011]. Defendant

Young-Kyu Park instructed defendant Boo Park not to bring the passports through the airport on his person but rather place the documents in his checked luggage. Defendant Boo Park stated that he reserved a ticket for September 12, 2011. Defendant Young-Kyu Park stated that he would obtain a plane ticket, traveling from Las Vegas, Nevada to Los Angeles, California on September 12, 2011. Defendant Boo Park stated he would call or email defendant Young-Kyu Park after he collected all the money and things.

b. On or about September 12, 2011, over the Second Young-Kyu Park Target Facility, defendant Boo Park called defendant Young-Kyu Park. During this intercepted conversation, the following conversation ensued, in substance and in part [YKP = defendant Young-Kyu Park and BP = defendant Boo Park]:

BP: Sir?
YKP: Yes.
BP: . . . Says he's going to do a passport.
YKP: Who?
BP: [Customer I.P.] [Customer I.P.]
KP: [Customer I.P.?], the old person?
BP: Yes, he's going to do a passport-he also thinks it'll be safer than shipping it.
YKP: Uh, okay. So he's going to pay \$1,000 and get it done.
BP: Yes. So, in your opinion, you're saying that it looks more clean, right?
YKP: That's true.
BP: So I told the person.
YKP: Okay, then I'll give [the person] \$1,000 to get it done so give it to me tomorrow.
BP: Yes.
YKP: Give it [to me] tomorrow and one more-the person-
BP: I'm planning to call him/her around the time when I see you.
YKP: Okay, all right, okay.
BP: Yes, yes.
YKP: Mm-mm.

c. On or about September 12, 2011, a law enforcement officer observed and video recorded defendants Young-Kyu Park and Boo Park meeting at a hotel in Los Angeles, California. Before the meeting, defendant Young-Kyu Park was observed arriving at the hotel empty handed. Several minutes later, defendants Young-Kyu Park and Boo Park were observed and video recorded in the hotel lobby, and defendant Young-Kyu Park had a Federal Express envelope in his possession. Later that day, defendant Young-Kyu

Park met a co-conspirator whom, based this investigation, Your Affiant knows to be an individual who alters and counterfeits passports (hereinafter "Co-Conspirator One") and was observed and video recorded providing a Federal Express envelope to Co-Conspirator One.

d. On or about September 13, 2011, at approximately 4:35 p.m. (PST), a law enforcement officer observed and video recorded defendant Young-Kyu Park meeting with Co-Conspirator One in Los Angeles, California. Defendant Young-Kyu Park was observed and video recorded in a car driven by defendant Yang-Gon Kim. Thereafter, defendant Young-Kyu Park exited the car driven by defendant Yang-Gon Kim and entered a car driven by Co-Conspirator One.

e. On or about September 13, 2011, at approximately 4:41 p.m. (PST), over the Second Young-Kyu Park Target Facility, defendant Boo Park called defendant Young-Kyu Park. During this intercepted conversation, defendant Young-Kyu Park stated, "I'm on my way to the hotel. [I] picked up the passport." Defendant Young-Kyu Park stated, "If I leave now, it should be okay to leave the passport in the car." Defendant Young-Kyu Park stated he would take defendant Boo Park out for sashimi and then bring him back to the hotel. They agreed to meet in approximately fifteen minutes.

f. On or about September 14, 2011, over the Second Young-Kyu Park Target Facility, defendant Boo Park called defendant Young-Kyu Park. During this intercepted conversation, defendant Boo Park stated that he had arrived back [in New Jersey] without any trouble. Defendant Young-Kyu Park stated that it takes only two days to bring a customer to a NJMVC office; however, if they agreed to work together to obtain driver's licenses for others, it would take extra time to send and receive documents [i.e., the fraudulently obtained Forms I-797 from defendant Young-Kyu Park on the West Coast and defendant Boo Park in New Jersey]. Defendant Young-Kyu Park stated that they get approximately \$500 or \$1,000 at the time they pick up documents, and it was not good to be seen by many people, so it was better to complete cases quickly and then forget about it. Defendant Boo Park stated he would meet Customer I.P. and then return the passport, which had been altered, back to defendant Young-Kyu Park. Lastly, defendant Boo Park asked about obtaining an E-2 visa where the individual did not have a social security number. Defendant Young-Kyu Park replied that he had no problem handling such cases.

g. On or about September 14, 2011, over the Second Young-Kyu Park Target Facility, defendant Boo Park called defendant Young-Kyu Park. During this intercepted conversation, defendant Boo Park called from a NJMVC office and stated that Customer I.P. was standing in line. Defendant Boo Park then asked Young-Kyu Park to email him the address where the passport could be sent.

h. According to records from the NJMVC, on or about September 14, 2011, Customer I.P. was issued a New Jersey driver's license at a NJMVC office in Newark, New Jersey.

46. Customers J.Y.Y. and Y.J.H.

a. On or about March 24, 2012, defendant Young-Kyu Park sent an email to himself from the First Young-Kyu Park Email Account to the same account. The email's subject line was "Peter boo park case." In this email, defendant Young-Kyu Park listed the names and corresponding dates of customers defendant Boo Park had handled, including an individual with the initials J.Y.Y. on October 24, 2011 (hereinafter "Customer J.Y.Y.") and an individual with the initials Y.J.H. on November 3, 2011 (hereinafter "Customer Y.J.H."):

b. Customer J.Y.Y.

(1) On or about October 24, 2011, a law enforcement officer observed and video recorded Customer J.Y.Y. meeting defendant Boo Park in Fort Lee, New Jersey. Thereafter, defendant Boo Park and Customer J.Y.Y. were observed and video recorded at a NJMVC office in Somerville, New Jersey. On or about October 24, 2011, over the Second Young-Kyu Park Target Facility, defendant Boo Park called defendant Young-Kyu Park. During this intercepted conversation, defendant Boo Park stated that he was in New Jersey, and the person [Customer J.Y.Y.] had been in there [in the NJMVC office] for a long time. Defendant Young-Kyu Park asked if defendant Boo Park had educated the person, and defendant Boo Park replied that he had educated [i.e., prepared] the Customer.

(2) Later that day, over the Second Young-Kyu Park Target Facility, defendant Boo Park again called defendant Young-Kyu Park. During this intercepted conversation, defendant Boo Park stated that he had just deposited the money. Defendant Boo Park added that it took a long time [at the NJMVC office] because an error had occurred in inputting the social security number, and a supervisor had to come and fix it. Defendant Young-Kyu Park stated that his advertisements have been a mess,

but had been fixed, and he now expects more customers. Defendant Young-Kyu Park then asked about the bank statement that he had made for Customer J.Y.Y., and defendant Boo Park stated that the statement was good. Defendant Boo Park then remarked that he was waiting inside the NJMVC office while the customer obtained the driver's license, and defendant Young-Kyu Park instructed defendant Boo Park that he should ordinarily not go into the NJMVC office. Defendant Boo Park stated that he had received cash from the customer and deposited in a Chase bank account.

(3) According to records from Chase Bank, on or about October 24, 2011, approximately \$3,000 in cash was deposited into the Soong-Young Park Chase Account.

(4) According to records from the NJMVC, on or about October 24, 2011, Customer J.Y.Y. was issued a New Jersey driver's license at a NJMVC office in Newark, New Jersey.

c. Customer Y.J.H.

(1) On or about October 31, 2011, over the Second Young-Kyu Park Target Facility, defendant Boo Park called defendant Young-Kyu Park. During this intercepted conversation, defendant Young-Kyu Park stated that he had just sent defendant Boo Park a text message concerning Customer Y.J.H., who wanted to obtain a driver's license on Saturday. Defendant Boo Park stated that he preferred meeting the customer that day or the next. Defendant Young-Kyu Park directed defendant Boo Park to give the customer a call thirty minutes in advance and to collect \$500 as a deposit.

(2) Later that day, on or about October 31, 2011, a law enforcement officer observed and video recorded defendant Boo Park meet Customer Y.J.H. in Fort Lee, New Jersey.

(3) Later that day, on or about October 31, 2011, defendant Boo Park sent an email to defendant Young-Kyu Park, which email was received in the First Young-Kyu Park Email Account. In this email, defendant Boo Park included Customer Y.J.H.'s name, address, date of birth, and her I-94 number. On or about November 1, 2011, defendant Young-Kyu Park responded to the email, stating, "Please take a look at [your] schedule" and attached to the email was an attachment, whose file name was "NJPeter [in English] case." The attachment included information concerning nine customers, including Customer Y.J.H., who was to be taken to a NJMVC office on November 3, 2011.

(4) On or about November 1, 2011, defendant Young-Kyu Park sent an email from the First Young-Kyu Park Email Account to defendant Boo Park. In this email, defendant Young-Kyu Park wrote, "Make the deposit into any one of the below bank accounts[,] whatever is more convenient." Defendant Young-Kyu Park listed the following bank accounts in the email:

Chase Bank (opened in New Jersey) [Soong-Young Park Chase Account]
Bank routing number[:] [redacted]
Bank account number[:] [redacted]
Name: Soong Park [defendant Soong-Young Park]

Bank name: Bank of America (opened in New Jersey) [Soong-Young Park Bank of America Account]
Bank account number: [redacted]
Name: Soong Y. Park [defendant Soong-Young Park]
[address redacted]

Wells Fargo (opened in California) [the Soong-Young Park Wells Fargo Account]
Account holder name: Soong Park [defendant Soong-Young Park]
Routing number: [redacted]
International Wire Transfer Wire: [redacted]
Account Number: [redacted]

(5) On or about November 3, 2011, over the Second Young-Kyu Park Target Facility, defendant Boo Park called defendant Young-Kyu Park. During this intercepted conversation, defendant Boo Park stated that the Customer had gotten a flat tire at the NJMVC office, and he would deposit approximately \$2,900 for defendant Young-Kyu Park. Defendant Boo Park stated that he would deposit approximately \$3,100 the next day. Defendant Young-Kyu Park stated he would email defendant Boo Park and advise him which account-Chase or Bank of America-to make the deposit.

(6) According to records from Chase Bank, between on or about November 4, 2011 (Friday) and November 7, 2011 (Monday), approximately \$3,000 in cash and a \$100 money order (total deposit of approximately \$3,100) was deposited into the Soong-Young Park Chase Account.

(7) On or about November 3, 2011, a law enforcement officer observed and video recorded defendant Boo Park and Customer Y.J.H. at a NJMVC office in Newark, New Jersey.

(8) According to records from the NJMVC, on or about November 3, 2011, Customer Y.J.H. was issued a New Jersey driver's license.

Defendant Huong K. Shin

47. On or about August 17, 2011, defendant Hyeun-Jin Park sent an email to defendant Young-Kyu Park, which email was received in the Third Young-Kyu Park Email Account. The email's subject line stated "New Jersey, customer phone." [At this time, defendant Hyeun-Jin Park was physically located in Las Vegas, Nevada]. In this email, defendant Hyeun-Jin Park gave defendant Young-Kyu Park the phone number of defendant Huong K. Shin.

48. On or about August 30, 2011, defendant Young-Kyu Park sent an email from the First Young-Kyu Park Email Account to defendant Boo Park. The email's subject line was "document sent." In this email, defendant Young-Kyu Park wrote, "Boo Park. Documents sent today by fed ex, will send overnight [in English]. [You] will get it tomorrow. Also sent [defendant] Huong K. Shin. [I have] done this person from long time ago. Huong K. Shin ([phone number redacted]). Please deliver it to him. [I] gave him your name and he said he knows you. He's a taxi driver."

49. On or about August 30, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Boo Park. During this intercepted conversation, defendant Boo Park stated that he had received defendant Young-Kyu Park's email and understood defendant Young-Kyu Park's instructions. Defendant Boo Park stated defendant Huong K. Shin was a cab driver that used to work for defendant Boo Park. Defendant Young-Kyu Park stated he agreed to charge defendant Huong K. Shin approximately \$3,000 for a driver's license.

50. According to records from the Washington State Department of Licensing, on or about September 2, 2011, defendant Huong K. Shin was issued a Washington State driver's license. To obtain this driver's license, defendant Huong K. Shin falsely represented himself to be a resident of Washington State.

51. On or about September 7, 2011, over the Second Young-Kyu Park Target Facility, defendant Boo Park called defendant Young-Kyu Park. During this intercepted conversation, defendant Young-Kyu Park stated that he had spoken with defendant Huong K. Shin. Defendant Young-Kyu Park stated that defendant Huong K. Shin had purchased a plane ticket to Seattle, Washington and had decided to obtain a driver's license in that state

because it was cheaper. Defendant Young-Kyu Park stated that defendant Huong K. Shin was having some financial difficulties.

52. Customer H.K.C.

a. On or about February 25, 2012, defendant Young-Kyu Park sent an email from the First Young-Kyu Park Email Account to defendant Huong K. Shin. In the email, defendant Young-Kyu Park wrote, "Mr. Huong K. Shin. Took me a while to find your phone number which I had forgotten. Anyway, regarding the work I mentioned on the phone, [I have] agreed to work with you[.] I hope we trust and understand each other. This is the customer [you] are to meet on Saturday (3/3). Name is [an individual with the initials H.K.C. (hereinafter "Customer H.K.C."]."

b. On or about February 25, 2012, defendant Young-Kyu Park sent an email from the First Young-Kyu Park Email Account to defendant Huong K. Shin. The email's subject line stated, "progress list." In this email, defendant Young-Kyu Park wrote, "Mr. [in English] Shin. [I have] attached the progress list. Going forward [I] will email you in this manner. If you have questions email me."

c. On or about March 3, 2012, defendant Huong K. Shin sent several emails to defendant Young-Kyu Park, which emails were received in the First Young-Kyu Park Email Account. In these emails, defendant Huong K. Shin attached several documents, including a Form I-94, a New Jersey driver's license, and Korean passport, all in Customer H.K.C.'s name.

d. According to records from the NJMVC, on or about March 9, 2012, Customer H.K.C. was issued a New Jersey driver's license.

e. On or about March 12, 2012, defendant Young-Kyu Park sent an email to himself from the First Young-Kyu Park Email Account to the Second Young-Kyu Park Email Account. The email's subject line stated, "NJ Mr. Shin Case." In the email, defendant Young-Kyu Park listed four customers' names, the date they obtained driver's licenses, and the amount that they had paid. These customers included Customer H.K.C. and an individual with the initials M.S.C. (hereinafter "Customer M.S.C.").

53. Customer M.S.C.

a. On or about February 29, 2012, defendant Young-Kyu Park sent an email from the First Young-Kyu Park Email Account to defendant Huong K. Shin. In this email, defendant Young-Kyu Park wrote, "Mr. Huong K. Shin. Progress list is attach [sic] [in English]. So please refer to the attached progress list. [I am] sending you the deposit bank accounts so please deposit at a convenient location. Account holder name is the same." Defendant Young-Kyu Park then listed information related to the First Hanna Park Citibank Account, the Second Hanna Park Citibank Account, and the Hanna Park Wells Fargo Checking Account.

b. On or about February 29, 2012, defendant Young-Kyu Park sent an email from the First Young-Kyu Park Email Account to defendant Huong K. Shin. In this email, defendant Young-Kyu Park provided instructions to defendant Huong K. Shin on how to send documents via Federal Express. In addition, defendant Young-Kyu Park directed defendant Huong K. Shin to meet Customer M.S.C. at her residence in Edison, New Jersey to pick up certain documents, including her passport, Form I-94, driver's license, and utility bill or bank statement.

c. On or about March 1, 2012, defendant Huong K. Shin sent approximately seven emails to defendant Young-Kyu Park over the span of approximately four minutes, which emails were received in the First Young-Kyu Park Email Account. In these emails, defendant Huong K. Shin attached photographs of Customer M.S.C.'s passport, Form I-94, driver's license, and utility bill.

d. According to records from the NJMVC, on or about March 5, 2012, Customer M.S.C. was issued a New Jersey driver's license.

Defendants Ho-Man Lee and Samuel H. Park

54. On or about September 22, 2011, over the Second Young-Kyu Park Target Facility, defendant Ho-Man Lee called defendant Young-Kyu Park. During this intercepted conversation, defendant Young-Kyu Park stated that he advertised in New Jersey. Furthermore, defendant Young-Kyu Park stated that he had a nephew [defendant Yang-Gon Kim] who was running a website company in Los Angeles, California, and defendant Young-Kyu Park had asked his nephew to take over the advertisement related work for him. Defendant Young-Kyu Park stated that he planned to go to Virginia in two weeks and stay at a hotel near defendant Ho-Man Lee's residence. Defendant Ho-Man Lee stated that he was living near Fairfax, Virginia and offered to help defendant Young-Kyu

Park find a hotel. Defendant Young-Kyu Park stated that he planned to stay in Virginia for about three weeks. Defendant Young-Kyu Park advised that he could help Virginia customers while he stays there. Defendant Ho-Man Lee stated that he has a friend who can make bank statements. Defendant Young-Kyu Park replied that he knows how to make bank statements look real.

55. On or about November 2, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Ho-Man Lee. During this intercepted conversation, defendant Young-Kyu Park stated that two individuals from Georgia, led by the owner of a driving school in Georgia, will meet defendant Ho-Man Lee in Virginia on Thursday, November 3, 2011. Defendant Young-Kyu Park advised that the fee in this case was approximately \$2,500 per person. Young-Kyu Park stated that he usually charged \$3,000 and wanted to charge \$4,000. Defendant Ho-Man Lee stated that it would be possible to take care of approximately five to ten cases [i.e., obtaining driver's licenses on behalf of Customers] per day in Virginia. Defendant Young-Kyu Park advised that he was not be able to do many cases in New Jersey because the applicant has to wait in line for two or three hours. As such, defendant Young-Kyu Park concluded that two cases a day are enough for a day in New Jersey.

56. Customers M.H.K. and J.E.S.

a. On or about October 31, 2011, defendant Samuel H. Park sent an email to defendant Young-Kyu Park, which email was received in Second Young-Kyu Park Email Account. In this email, defendant Samuel H. Park attached several documents, including a Korean passport, a Tennessee driver's license, a U.S. visa, and an I-94, all in the name of an individual with the initials M.H.K. (hereinafter "Customer M.H.K."), and U.S. visa and an I-94, all in the name of an individual with the initials J.E.S. (hereinafter "Customer J.E.S.").

b. On or about November 3, 2011, defendant Samuel H. Park sent an email to defendant Young-Kyu Park, which email was received in Second Young-Kyu Park Email Account. In this email defendant Samuel H. Park referred to Customer J.E.S. and listed an address in Virginia for Customer J.E.S.

c. On or about November 4, 2011, defendant Young-Kyu Park sent an email from the Second Young-Kyu Park Email Account to defendant Samuel H. Park. In this email, defendant Young-Kyu Park confirmed the meeting location, time, and the documents that Customer M.H.K. and Customer J.E.S. need to bring to the meeting. Defendant Young-Kyu Park then asked defendant Samuel H. Park for

Virginia addresses that the Customers would use to obtain the driver's licenses. The next day, on or about November 5, 2011, defendant Samuel H. Park sent an email to defendant Young-Kyu Park, which email was received in Second Young-Kyu Park Email Account. In this email, defendant Samuel H. Park provided defendant Young-Kyu Park with two addresses for Customer M.H.K. and Customer J.E.S.

d. On or about November 8, 2011, defendant Young-Kyu Park sent an email from the Third Young-Kyu Park Email Account to defendant Ho-Man Lee. In this email, defendant Young-Kyu Park told defendant Ho-Man Lee that the documents [Forms I-797 and banks statements] have been sent, and defendant Ho-Man Lee would receive the documents the following day. In addition, defendant Young-Kyu Park told defendant Ho-Man Lee to meet Customer M.H.K. and Customer J.E.S. on November 10, 2011. Defendant Young-Kyu Park further instructed defendant Ho-Man Lee to take two customers to different DMVs because they had identical bank statements.

e. On or about November 10, 2011, at approximately 9:04 a.m. (EST), over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Ho-Man Lee. During this intercepted conversation, defendant Young-Kyu Park stated he had overslept and that people from Atlanta, Georgia had been waiting since 7:00 a.m. Young-Kyu Park reported that the appointment was at 10:00 a.m., but he did not realize the guy sent him an email trying to change it to 9:00 a.m.

f. On or about November 10, 2011, over the Second Young-Kyu Park Target Facility, defendant Ho-Man Lee called defendant Young-Kyu Park. During this intercepted conversation, defendant Ho-Man Lee stated that a Georgia broker [defendant Samuel H. Park] had brought two customers from Georgia. Defendant Ho-Man Lee stated that it was very hard to work this way. According to defendant Ho-Man Lee, the broker [defendant Samuel H. Park] demanded that defendant Ho-Man Lee talk only to him [defendant Samuel H. Park]. Defendant Young-Kyu Park stated he would call defendant Samuel H. Park. Defendant Young-Kyu Park then asked if a customer had entered the DMV office. Defendant Ho-Man Lee told defendant Young-Kyu Park to only send customers in the future, not brokers.

g. On or about November 10, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Ho-Man Lee. During this intercepted conversation, defendant Samuel H. Park got on the phone and stated that he had told Customer J.E.S. to have the money ready a week ago, but she

did not have it. Defendant Samuel H. Park asked if defendant Young-Kyu Park would accept a check as payment for his services, and he replied, "no."

h. On or about November 10, 2011, a law enforcement officer observed and video recorded Samuel H. Park, Ho-Man Lee, Customer M.H.K., and Customer J.E.S. at a DMV in Virginia.

i. On or about November 10, 2011, defendant Young-Kyu Park sent an email from the Third Young-Kyu Park Email Account to defendant Ho-Man Lee. In this email, defendant Young-Kyu Park directed defendant Ho-Man Lee to deposit approximately \$4,000 for Customers J.E.S. and M.H.K. into the Hyeun-Jin Park Bank of America Account.

j. According to records from Bank of America, on or about November 10, 2011, the following deposits were made into the Hyeun-Jin Park Bank of America Account:

- (1) a \$1,500 cash deposit;
- (2) a \$2,000 cash deposit; and
- (3) a check, drawn on the account of Customer M.H.K., in the amount of \$2,500.

k. According to records from the Virginia Department of Motor Vehicles, it issued driver's licenses to Customer M.H.K. and Customer J.E.S. in or around mid-November 2011.

57. According to records from defendant Young-Kyu Park's emails, defendant Ho-Man Lee had escorted and helped approximately sixty Customers fraudulently obtain driver's licenses.

Defendant Jong-Ho Kim

58. According to records from the Virginia DMV, the Virginia Department of Motor Vehicles issued a driver's license to defendant Jong-Ho Kim in or around December 2011. Defendant Jong-Ho Kim fraudulently obtained this driver's license through defendants Young-Kyu Park and Ho-Man Lee. Thereafter, defendant Jong-Ho Kim became a member of the Park Criminal Enterprise who helped and escorted other customers to obtain driver's licenses.

59. On or about November 28, 2011, defendant Jong-Ho Kim sent an email to defendant Young-Kyu Park, which email was received in the First Young-Kyu Park Email Account. In this email, defendant Jong-Ho Kim provided his phone number and asked to speak with defendant Young-Kyu Park concerning driver's license issues. Later that day, from the same email account, defendant Young-Kyu Park replied, stating, "Mr. Jong-Ho Kim. As we spoke about on the phone scan and send [me] a copy of [your] passport and the extension page so that [I] can tell you whether [your] passport can be extended. It's because without passport extension [getting] a driver's license is not possible. If [you] send it [the passport] [I] will check it and email [you] the place to send [your] passport. If passport extension is possible, it will cost \$500."

60. On or about November 29, 2011, defendant Jong-Ho Kim sent an email to defendant Young-Kyu Park, which email was received in the First Young-Kyu Park Email Account. In this email, defendant Jong-Ho Kim stated, "please check and call." The email had several documents attached to it, including defendant Jong-Ho Kim's passport (with his picture) and the passport's extension page. Later that day, from the same email account, defendant Young-Kyu Park replied, instructing defendant Jong-Ho Kim to send his passport to defendant Hyeun-Jin Park in Las Vegas, Nevada. Defendant Young-Kyu Park "blind copied" defendant Ho-Man Lee on this email.

61. On or about March 12, 2012, defendant Jong-Ho Kim sent an email to defendant Young-Kyu Park, which email was received in the Second Young-Kyu Park Email Account. In this email, defendant Jong-Ho Kim wrote that an individual with the initials K.G.K. (hereinafter "Customer K.G.K.") did not have a utility bill. The email contained four attachments, including a Pennsylvania driver's license, a United States visa, and a Korean passport, all in the name of Customer K.G.K.

62. On or about March 30, 2012, defendant Young-Kyu Park sent an email to himself from the First Young-Kyu Park Email Account to the same account. This email's subject line stated, "Virginia Jong-Ho Kim Case." In this email, defendant Young-Kyu Park listed approximately fifteen Customers that defendant Jong-Ho Kim had escorted and helped to fraudulently obtain driver's licenses. In the email, defendant Young-Kyu Park named each Customer, how much money the Customer had paid for the driver's license, and the date when the driver's license was issued to the Customer.

Defendant Kae-Won Jho

63. On or about November 30, 2011, defendant Young-Kyu Park sent an email from the First Young-Kyu Park Email Account to defendant Kae-Won Jho. The email's subject line stated the following: "Regulations for NJ[,] VA[,] and NV DMV." In this email, defendant Young-Kyu Park explained, in detail, how he and his co-conspirators fraudulently obtained driver's licenses for customers for a fee. Defendant Young-Kyu Park wrote the following:

Erica, working with you even without [your husband] . . .
. . . Ok, since we are business partners now, [I] will say things in a less formal way. About VA DL . . . [sic] documents needed: 1. passport 2. passport with visa (not a must but if possessed then need to bring) 3. I-94 (not a must but if possessed then need to bring) 4. U.S. driver's license 5. statement with Virginia address or utility [bill] (if do not possess should bring address of somebody they know however we will prepare statement. If they don't even have address then we'll charge \$150 (fed ex included) to provide. About the fee . . . [sic] 3 years \$3,000 5 years \$4,000 (case of a new driver's license \$500).

Thereafter, defendant Young-Kyu Park also explained how he assisted customers with obtaining driver's licenses in other states, including New Jersey and Nevada. Defendant Young-Kyu Park stated, "[I] will pay \$200 per case. [I] know you are having a difficult time but since this is just the start work hard and let's fight [negotiate] later. . . . And if customers or brokers ask you [about your husband] or if you are working with me (Oscar[,] Anthony[,] or Tom), deny it and say you don't know [me]. Tell me what name you are going to use? . . . [sic] (Tell everybody that you are doing this business by yourself). . . . Say there are people working in New Jersey and Nevada (Las Vegas). . . . OK, end of class." Defendant Young-Kyu Park then forwarded this email to defendant Jong-Hyek Park and instructed him to read the email.

64. On or about December 28, 2011, defendant Kae-Won Jho sent an email to defendant Young-Kyu Park, which email was received in the First Young-Kyu Park Email Account. In this email, defendant Kae-Won Jho provided her address and name.

65. Customer Y.S.O.

a. On or about November 30, 2011, defendant Kae-Won Jho sent an email to defendant Young-Kyu Park, which email was received in the First Young-Kyu Park Email Account. In this email, defendant Kae-Won Jho provided information on an individual with the initials Y.S.O. (hereinafter "Customer Y.S.O.") and included an attachment consisting of a Korean passport and Washington State driver's license (with photograph) of Customer Y.S.O.

b. On or about December 1, 2011, defendant Young-Kyu Park sent an email from the First Young-Kyu Park Email Account to defendant Ho-Man Lee. In this email, defendant Young-Kyu Park wrote, "[Customer Y.S.O.] will arrive at McDonalds [located in Virginia] on Monday December 5th. The person who introduced this customer is the wife of an old friend of mine who is young Erica [defendant Kae-Won Jho] lives in Atlanta, Georgia, is a citizen, husband used to go back and forth to China . . . [sic] long time ago, he did jump [alien smuggling across the border] for a long time." Later that day, defendant Young-Kyu Park sent an email from the First Young-Kyu Park Email Account to defendant Ho-Man Lee. In this email, defendant Young-Kyu Park attached a document with the filename "VA [in English] case." This attachment contained information on approximately eleven Customers seeking driver's licenses in Virginia, including Customer Y.S.O.

c. According to records from the Virginia Department of Motor Vehicles, it issued a driver's license to Customer Y.S.O. in or around December 2011.

66. According to records from defendant Young-Kyu Park's emails, defendant Kae-Won Jho assisted and facilitated approximately fifteen customers with fraudulently obtaining driver's licenses in Virginia.

Defendant Young-Bae Gu

67. On or about September 17, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Young-Bae Gu. During this intercepted conversation, defendant Young-Kyu Park stated that he wanted to discuss advertisements. Defendant Young-Kyu Park stated that he had advertisements running in the Las Vegas Times, three Korean newspapers in Los Angeles, California, the Korea Times, the Korea Daily, and Sports Seoul. Defendant Young-Kyu Park asked defendant Young-Bae Gu what other Las Vegas newspaper he would

recommend to run advertisements. Defendant Young-Bae Gu mentioned a website and Koreana News. Defendant Young-Kyu Park stated he would run an advertisement in the Koreana News. Thereafter, defendant Young-Bae Gu asked about the documents requirement for an overstayed Korean, and defendant Young-Kyu Park replied that a person who entered the United States with a visa would need a passport with the visa and a Form I-94; a person who entered on a visa-exemption needed a passport and I-94; and a person who had sneaked in to the United States needed a passport. Defendant Young-Kyu Park reported that if he could stop people from taking their cases [i.e., obtaining driver's licenses] to Seattle, Washington, then they can do 300 to 500 cases per month. Defendant Young-Kyu Park asked defendant Young-Bae Gu to place an advertisement some place good so that they could work together, and defendant Young-Bae Gu stated he would place a driver's license advertisement on a website. Defendant Young-Kyu Park added that they could charge \$2,000 to \$2,500. Defendant Young-Kyu Park remarked that the only negative side of obtaining driver's licenses in Las Vegas, Nevada is taking the test in English. According to defendant Young-Kyu Park, the customers would need to prepare for the test before coming to Las Vegas, Nevada.

68. On or about September 17, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Young-Bae Gu. During this intercepted conversation, defendant Young-Bae Gu stated he had been asked by a customer, whose passport was soon to expire, if it was possible to renew a driver's license. Defendant Young-Kyu Park stated that he needed to know if the customer could renew the passport alone, or would they need to assist the customer in renewing the passport. Defendant Young-Kyu Park stated that he charged an extra \$1,000 for his passport renewing service. Defendant Young-Bae Gu stated that he would ask the customer. Defendant Young-Kyu Park and Young-Bae Gu remarked that the DMV office in Las Vegas, Nevada did not carefully check documents.

69. On or about September 26, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Young-Bae Gu. During this intercepted conversation, defendant Young-Bae Gu asked if defendant Young-Kyu Park had returned to Las Vegas, Nevada, and defendant Young-Kyu Park replied that he had returned. Defendant Young-Kyu Park advised defendant Young-Bae Gu to refrain from handling cases from brokers because, according to defendant Young-Kyu Park, these brokers were stupid because they used fake documents, and they would get caught. Defendant Young-Bae Gu stated that he received an inquiry from a customer who lived approximately three hours away.

70. Customer J.H.B.

a. On or about September 22, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Young-Bae Gu. During this intercepted conversation, defendant Young-Kyu Park asked about an individual with the initials J.H.B. (hereinafter "Customer J.H.B."). Defendant Young-Bae Gu stated he would call Customer J.H.B.

b. On or about September 27, 2011, defendant Young-Kyu Park sent an email to himself from the Second Young-Kyu Park Email Account to the same account. The email's subject line was "WAC H4 [in English]." The email contained a completed template of a Form I-797 in the name of Customer J.H.B. Based on the investigation, including information from Cooperating Witness One, Your Affiant knows that defendant Young-Kyu Park uses certain computer software to create a Form I-797 template. Defendant Young-Kyu Park then obtains a genuine blank Form I-797, places it in a printer, and then prints the Form I-797 template onto the blank Form I-797.

c. On or about October 18, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Young-Bae Gu. During this intercepted conversation, defendant Young-Kyu Park asked if defendant Young-Bae Gu had received the \$2,000. Defendant Young-Bae Gu replied that he had received the money, would keep approximately \$300, and then deposit the \$1,700 into defendant Soong-Young Park's Bank of America account. According to records from Bank of America, on or about October 18, 2011, a \$1,700 cash deposit was made into the Soong-Young Park Bank of America Account

d. According to records from the Nevada DMV, it issued a driver's license to Customer J.H.B. in or around mid-November 2011.

71. Customer J.R.L.

a. On or about December 13, 2011, defendant Young-Bae Gu sent an email to defendant Young-Kyu Park, which email was received in the First Young-Kyu Park Email Account. The email's subject line was "FW [forward]: scan doc [in English]." In this email, defendant Young-Bae Gu stated, "Sending [you] document." The email contained an attachment, consisting of a one page scanned copy of a Korean passport (with photograph), Form I-94, and a North Carolina driver's license for Customer J.R.L.

b. According to records from the Nevada DMV, it issued a driver's license to Customer J.R.L. in or around December 2011.

Defendant Hai-Sok Cho

72. On or about April 9, 2011, a law enforcement officer observed and video recorded defendant Young-Kyu Park and defendant Hai-Sok Cho leaving a golf course in Bergen County, New Jersey. Thereafter, they were observed and video recorded entering a restaurant in Palisades Park, New Jersey.

73. On or about April 11, 2011, Cooperating Witness One called defendant Hai-Sok Cho over the Cooperating Witness One Facility. During this consensually recorded conversation, defendant Hai-Sok Cho advised Cooperating Witness One about two customers. First, defendant Hai-Sok Cho stated that he had a customer with a Pennsylvania driver's license who lived in New Jersey but did not have a social security card. Second, defendant Hai-Sok Cho discussed a Customer who had a New Jersey driver's license and a social security card but no passport. Defendant Hai-Sok Cho stated that this second Customer, who was approximately thirty years of age, came to the United States at the age of twelve or thirteen. Cooperating Witness One stated that it would be difficult to help the second Customer unless a passport was made for the person. Cooperating Witness One then explained which documents defendant Hai-Sok Cho needed to process the work for the first Customer. Defendant Hai-Sok Cho asked Cooperating Witness One to find out about obtaining a passport for the second Customer.

74. On or about April 29, 2011, defendant Hai-Sok Cho called Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, defendant Hai-Sok Cho stated that he was concerned after seeing the news article [see above concerning the arrest of Customer H.B.] and asked if everything was okay. Cooperating Witness One replied it was. Defendant Hai-Sok Cho then asked if he could proceed with the case that they had previously discussed. Cooperating Witness One asked if defendant Hai-Sok Cho had taken care of the passport and other matters, and defendant Hai-Sok Cho replied that he had. Cooperating Witness One advised defendant Hai-Sok Cho to call when he was ready.

75. On or about April 29, 2011, defendant Hai-Sok Cho called Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, the following conversation ensued, in substance and in part [CW1 = Cooperating Witness One and HSC = defendant Hai-Sok Cho]:

HSC: And, I want to see you. I have something to say.
CW1: Yes.
HSC: [Sigh]
CW1: Uhh.
HSC: If you have the time, it'd be good if you can stop
by my office and have a cup of tea.
CW1: Well, I'm having a meal right now-
HSC: Sometime, later on-
CW1: Yes.
HSC: By any chance, did you just talk to President
Park [defendant Young-Kyu Park].
CW1: Yes.
HSC: Went to L.A. and-
CW1: Yes-yes.
HSC: Have something to inform [you] about President
Park [defendant Young-Kyu Park].
CW1: All right. Well-I'd be seeing you tomorrow at the
latest so-
HSC: Right. We can talk after [UI] documents.
CW1: Yes. Let's meet as soon as the [documents] are
ready, today or tomorrow.
HSC: Do that-go on with your meal.
CW1: Yes, all right. Bye.

76. Customer J.H.H.

a. On or about May 2, 2011, Cooperating Witness One went to defendant Hai-Sok Cho's office in Palisades Park, New Jersey. During this consensually recorded meeting, defendant Hai-Sok Cho gave Cooperating Witness One several documents related to an individual with the initials J.H.H. (hereinafter "Customer J.H.H."), including a copy of a Korean passport, Forms I-94, a telephone bill, and a Pennsylvania driver's license, all in the name of Customer J.H.H. In addition, according to Cooperating Witness One, defendant Hai-Sok Cho gave Cooperating Witness One approximately \$500 as a deposit. After this meeting, Cooperating Witness One provided these documents to law enforcement, and the documents were photographed.

b. On or about May 4, 2011, a law enforcement officer observed and video recorded Customer J.H.H. and Cooperating Witness One entering a NJMVC office in Newark, New Jersey. Later that day, Cooperating Witness One met defendant Hai-Sok Cho at his office in Palisades Park, New Jersey. During this consensually recorded meeting (audio and video), Cooperating Witness One gave approximately \$800 in cash to defendant Hai-Sok Cho as payment from Customer J.H.H. for obtaining the driver's license. According to Cooperating Witness One, the \$800 cash payment to defendant Hai-Sok Cho represented his cut for

referring Customer J.H.H. to defendant Young-Kyu Park and Cooperating Witness One.

c. According to records from the NJMVC, it issued a driver's license to Customer J.H.H. on or about May 4, 2011.

77. On or about July 20, 2011, defendant Hai-Sok Cho called Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, the following conversation ensued, in substance and in part [CW1 = Cooperating Witness One and HSC = defendant Hai-Sok Cho]:

CW1: Hello.

HSC: Hello. . . . Aren't you doing any jobs lately?

CW1: Lately? I restarted doing things. Not many, just little by little I am doing it. . . . I am abstaining from cases without a social as much as possible. Because getting a social letter is awkward and going and doing it [with or for a social letter] is too. So, lately, there are cases when no second look is called for, you know.

HSC: Right.

CW1: I am working such cases.

HSC: Right. You don't want to do risky jobs.

CW1: So, if there is a social number and an out-of-state license, all the better if it's a New Jersey license.

HSC: Um.

CW1: Has a document to prove the address. And, if there's the visa document attached which was used when first entered the U.S.

HSC: Even if that one is an old one?

CW1: Yes-yes. Of course. If has a valid passport. Then, there is no problem.

HSC: For such a case, how much do you charge?

CW1: The thing you mentioned may be The Texas license you mentioned may be a little awkward.

HSC: I guess it won't be possible. Because it is without the thing.

CW1: Yes-yes.

HSC: Because there is no social. Apart from that, if there is a case with such conditions you mentioned, how much would you charge?

CW1: Lately, I wanted to raise the price, but will do it after some consideration. [The charge] is same as before.

HSC: How much?

CW1: \$3,500.

HSC: Then, how much will be the wholesale price? Huh?
CW1: That will be as you've done before, you keep around \$1,000.
HSC: Yes.
CW1: Yes, from \$3,500. I guess that will be how it will go.
HSC: You mean that I would collect \$3,500 and keep around \$1,000?
CW1: Yes-yes. I guess you may deduct \$1,000 from \$3,500.
HSC: I will. I know several people who are under such conditions. I couldn't get it touch with you, I thought it couldn't be done, so I didn't try. Now I got it.
CW1: For a while, I didn't do it for a while. [laugh]
HSC: Um. I got it. I will contact you again.
CW1: Yes-yes.
HSC: Yes.

Defendant Yong-Hae Kim

78. On or about December 6, 2010, defendant Yong-Hae Kim called Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, defendant Yong-Hae Kim stated that he was referred to Cooperating Witness One by defendant Young-Kyu Park. Defendant Yong-Hae Kim further stated that he had a driver's license customer and was having difficulty contacting the customer. Defendant Yong-Hae Kim stated that he had heard that they [he and the customer] had a 2:00 p.m. appointment at a NJMVC office. Defendant Yong-Hae Kim asked if Cooperating Witness One had the customer's documents necessary to obtain the driver's license, and Cooperating Witness One replied that defendant Young-Kyu Park told Cooperating Witness One where the documents were located. Later that day, defendant Yong-Hae Kim called Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, defendant Yong-Hae Kim stated that he was calling about the work that defendant Young-Kyu Park was doing for defendant Yong-Hae Kim. Defendant Yong-Hae Kim stated that the driver's license test was located in Newark, New Jersey. Defendant Yong-Hae Kim stated that the customer was coming from Pennsylvania and the appointment was at 2:00 p.m.

79. Customer H.J.P.

a. On or about December 7, 2010, defendant Yong-Hae Kim called Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, defendant Yong-Hae Kim stated that the customer was in Palisades Park, New Jersey.

b. According to Cooperating Witness One, he/she escorted this customer to the NJMVC office in Newark, New Jersey. On or about December 7, 2010, near the NJMVC office in Newark, New Jersey, a law enforcement officer observed and video recorded Cooperating Witness One and the customer, later identified as an individual with the initials H.J.P. (hereinafter "Customer H.J.P.") enter and exit the NJMVC office.

c. According to records from the NJMVC, it issued a New Jersey identification card to Customer H.J.P. on or about May 7, 2011. Furthermore, according to records from the NJMVC, Customer H.J.P. provided an address in Palisades Park, New Jersey. This address corresponds to defendant Yong-Hae Kim's residence. In addition, Cooperating Witness One provided law enforcement with a copy of the Form I-797 that Customer H.J.P. presented to the NJMVC office. The address listed on the Form I-797 also corresponds to defendant Yong-Hae Kim's residence.

d. On or about January 2, 2012, defendant Young-Kyu Park sent an email from the First Young-Kyu Park Email Account to Customer H.J.P.'s uncle. Defendant Young-Kyu Park "blind copied" defendant Ho-Man Lee on this email. In this email, defendant Young-Kyu Park confirmed an appointment in Virginia for Customer H.J.P. to meet with defendant Ho-Man Lee to obtain a driver's license. Defendant Young-Kyu Park stated, "Last time through President Bae [defendant Yong-Hae Kim] in New Jersey she [Customer H.J.P.] failed the driver's test and gave up and wasted money."

e. According to records from the Virginia Department of Motor Vehicles, Customer H.J.P. obtained a Virginia driver's license in or around January 2012.

80. The Undercover Purchase of a Counterfeit Passport

a. In or around September 2010, Cooperating Witness Three was arrested by the Federal Bureau of Investigation for his/her involvement in a scheme to use fraudulently obtained identities to commit fraud. Cooperating Witness Three used a fraudulently obtained identity that belonged to a real person (hereinafter the "Fraudulent Identity").

b. On or about July 18, 2011, during a consensually recorded conversation, defendant Yong-Hae Kim and Cooperating Witness Three agreed to meet to discuss the purchase of documents. They agreed to meet in Palisades Park, New Jersey later that day. Cooperating Witness Three informed defendant Yong-Hae Kim that he/she had a picture and \$5,000 in cash ready for a passport. Defendant Yong-Hae Kim asked how many passports Cooperating Witness Three sought to purchase, and Cooperating Witness Three stated it was for one person.

c. On or about July 18, 2011, in Palisades Park, New Jersey, Cooperating Witness Three met defendant Yong-Hae Kim. This meeting was consensually recorded (audio and video). During this meeting, defendant Yong-Hae Kim commented that defendant Young-Kyu Park was not the only person who did driver's licenses, and defendant Yong-Hae Kim remarked that Oscar [defendant Young-Kyu Park] was an "SOB" because he asked for full payment in cash at the time the customer applied for the driver's license. Defendant Yong-Hae Kim relayed a conversation that he had with defendant Young-Kyu Park to Cooperating Witness Three: "You SOB. You make it for two and half [years] while others make it for three and a half [years]." Cooperating Witness Three then asked defendant Yong-Hae Kim if he was obtaining driver's licenses through another broker, and he stated that he was still obtaining driver's licenses through defendant Young-Kyu Park by sending him information. Defendant Yong-Hae Kim stated that defendant Young-Kyu Park was in Los Angeles, California, but has a "front man" in New Jersey. Thereafter, defendant Yong-Hae Kim asked Cooperating Witness Three if he/she wanted a passport made. Cooperating Witness Three stated that he/she sought a passport of a United States citizen instead of a driver's license [as described below, however, defendant Yong-Hae Kim provided Cooperating Witness Three with a Korean passport]. Defendant Yong-Hae Kim asked for the person's picture, biographical information, and a down payment. Thereafter, Cooperating Witness Three gave defendant Yong-Hae Kim passport photographs (of Cooperating Witness Three), information belonging to the Fraudulent Identity, and \$5,000 in cash.

d. On or about August 8, 2011, Cooperating Witness Three met defendant Yong-Hae Kim in Palisades Park, New Jersey. During this consensually recorded conversation, defendant Yong-Hae Kim gave Cooperating Witness Three a Korean passport in the name of the Fraudulent Identity. Cooperating Witness Three gave defendant Yong-Hae Kim approximately \$3,000 in cash.

Defendants Sung-Kum Choi, Jong-Hyuk Park, and Sung-Hee Bae

81. According to Cooperating Witness Two, in or around April 2011, he/she met defendant Jong-Hyuk Park on a Korean social networking website. According to Cooperating Witness Two, after meeting through the website, they met in person. According to Cooperating Witness Two, defendant Jong-Hyuk Park stated that he had come to the United States at the request of his older cousin, defendant Sung-Kum Choi, a driver's license and immigration broker in New Jersey. Furthermore, according to Cooperating Witness Two, defendant Jong-Hyuk Park stated that he worked for defendant Sung-Kum Choi, who obtains driver's licenses and E-2 visas for his customers, using fraudulent supporting documents, including fraudulent Forms I-797. According to Cooperating Witness Two, defendant Jong-Hyuk Park reported that they used these fraudulently obtained Forms I-797 to obtain driver's licenses. In addition, according to Cooperating Witness Two, defendant Jong-Hyuk Park stated that they created other documents, such as bank statements, to obtain driver's licenses. During this meeting, according to Cooperating Witness Two, defendant Jong-Hyuk Park reported that they charge approximately \$3,500 for a driver's license and approximately \$10,000 for an E-2 visa. Furthermore, defendant Jong-Hyuk Park stated that they use a third party to create phony tax returns needed for the E-2 visa scheme. According to Cooperating Witness Two, defendant Jong-Hyuk Park asked Cooperating Witness Two to join the scheme. Cooperating Witness Two also reported that a Korean female, named "Tina" [defendant Sung-Hee Bae] was a member of the scheme. Cooperating Witness Two further advised that defendant Jong-Hyuk Park stated that Sung-Kum Choi's document maker and document supplier was "Oscar Park" [defendant Young-Kyu Park]. During the meeting, according to Cooperating Witness Two, defendant Jong-Hyuk Park stated that Oscar Park had a long working history with defendant Sung-Kum Choi. Defendant Jong-Hyuk Park told Cooperating Witness Two that "Oscar Park" previously reused forms [Forms I-797] by erasing and retyping the information; however, "Oscar Park" had a supply of 200 new forms [Forms I-797] that he was using for "DL" customers. According to Cooperating Witness Two, defendant Jong-Hyuk Park stated that "Oscar Park" sought to sell approximately 200 forms [Forms I-797] to Sung-Kum Choi for

approximately \$200 each, but Sung-Kum Choi did not purchase the forms.

82. On or about September 22, 2011, over the Second Young-Kyu Park Target Facility, defendant Sung-Kum Choi called defendant Young-Kyu Park. During this intercepted conversation, defendant Sung-Kum Choi stated that he visited all driving schools this morning, and he felt he and defendant Young-Kyu Park should be very careful. Defendant Young-Kyu Park commented that they should run the business for only three to six months, and that he posts advertisements only for three months and then stops. Defendant Sung-Kum Choi stated that he is a very careful guy and that defendant Young-Kyu Park should be wary, then they would both be safe. Defendant Young-Kyu Park noted that he did not foresee a big problem for now. Defendant Young-Kyu Park further noted that he has two guys whom he pays \$500 per case.

83. Customer M.H.L.

a. On or about September 12, 2011, defendant Sung-Kum Choi sent an email to defendant Young-Kyu Park, which email was received in the First Young-Kyu Park Email Account. The email's subject line stated, "This is New Jersey." In this email, defendant Sung-Kum Choi wrote, "This is driver's license case . . . [sic] President sending it with letter." The email contained approximately seven attachments all pertaining to an individual with the initials M.H.L. (hereinafter "Customer M.H.L."). The attachments included a Korean passport (with photograph), a U.S. visa, Pennsylvania driver's license, bank statement, and Form I-94, all in the name of Customer M.H.L., and a Form I-797 in the name of Customer M.H.L.'s husband.

b. On or about September 13, 2011, over the Second Young-Kyu Park Target Facility, defendant Sung-Kum Choi called defendant Young-Kyu Park. During this intercepted conversation, defendant Young-Kyu Park stated that he was on a business trip for about ten days. Defendant Young-Kyu Park stated that he opened his gmail account [the First Young-Kyu Park Email Account] that morning and saw something concerning Customer M.H.L. Defendant Sung-Kum Choi stated he had sent that email with the attached letters. Young-Kyu Park stated he would do it today [a Forms I-797] and send it back to defendant Sung-Kum Choi via express mail. Defendant Young-Kyu Park stated that he would have to do an E-2 classification on the Form I-797 if the person did not have a social security number and H-1 visa. According to Sung-Kum Choi, Customer M.H.L. did not have a social security number. Defendant Young-Kyu Park stated that he told [his people] not to give discounts to customer in New Jersey; however,

defendant Young-Kyu Park said it was okay to give Customers in Las Vegas, Nevada a break because the process was easier there. Defendant Sung-Kum Choi asked defendant Young-Kyu Park to do ten cases for \$1,200, and defendant Young-Kyu Park agreed. Later that day, during a subsequent intercepted conversation, Sung-Kum Choi stated that he had sent the address information to defendant Young-Kyu Park by email and asked him to check it. Sung-Kum Choi stated that he would send all seven cases that day, Sung-Kum Choi added that he had seven or eight cases currently and would take at least thirty to forty cases a month. Defendant Young-Kyu Park stated he would process all the cases at once.

84. Customer H.S.K.

a. On or about October 25, 2011, an individual with the initials H.S.K. (hereinafter "Customer H.S.K.") was arrested at the NJMVC office in Paterson, New Jersey with fraudulent documents in her possession, including a fraudulent Form I-797. Later that day, Cooperating Witness Two stated that he/she received information from both Jong-Hyuk Park and Sung-Hee Bae that their customer, Customer H.S.K., had been arrested. Later that day, Cooperating Witness Two met defendants Jong-Hyuk Park and Sung-Hee Bae in Fort Lee, New Jersey. During this consensually recorded meeting (audio), which was also observed and video recorded by a law enforcement officer, Cooperating Witness Two remarked that defendant Sung-Hee Bae looked much better because earlier in the day she was pale with fear. Defendant Sung-Hee Bae stated that she has been unable to eat all day because she was concerned about the situation. Cooperating Witness Two then asked what happened and confirmed with defendants Jong-Hyuk Park and Sung-Hee Bae that Customer H.S.K. had been arrested. Defendant Jong-Hyuk Park stated that he believed that Customer H.S.K. must have provided information to law enforcement. Defendant Sung-Hee Bae stated that she was concerned because Customer H.S.K. had defendant Sung-Hee Bae's cellular telephone number. Defendant Sung-Hee Bae asked if she would be arrested if Customer H.S.K. disclosed defendant Sung-Hee Bae's phone number.

85. Customers J.S.Y. and J.K.L.

a. On or about October 27, 2011, defendant Sung-Kum Choi sent an email to defendant Young-Kyu Park, which email was received in the First Young-Kyu Park Email Account. The email's subject line was "This is President Choi's office." In this email, defendant Sung-Kum Choi wrote, "This is the scan." The attachments included a hand-written note from defendant Sung-Kum Choi to defendant Young-Kyu Park that provided information

related to two individuals with the initials J.S.Y. and J.K.L. (hereinafter "Customer J.S.Y." and "Customer J.K.L.," respectively). One attachment included a scanned copy of J.S.Y.'s Korean passport, New Jersey driver's license, business card, bank statement, and another attachment included a scanned copy of Customer J.K.L.'s Washington State driver's license, social security card, business card, utility bill, I-94, Korean passport, and U.S. visa.

b. On or about October 28, 2011, over the Second Young-Kyu Park Target Facility, defendant Sung-Kum Choi called defendant Young-Kyu Park. During this intercepted conversation, defendant Sung-Kum Choi stated that he took two customers, Customer J.S.Y. and Customer J.K.L., to a NJMVC office in Lodi, New Jersey. Defendant Young-Kyu Park commented that the NJMVC offices in Somerville and Oakland, New Jersey were quicker for customers who were renewing their driver's licenses.

c. On or about October 28, 2011, a law enforcement officer observed and video recorded defendant Sung-Kum Choi exit an apartment building located in Palisades Park, New Jersey and enter a mini-van. Thereafter, defendants Sung-Kum Choi traveled to a Federal Express mail drop facility in Palisades Park, New Jersey, where defendant Sung-Kum Choi was observed and video recorded exiting the location with documents in his hand. The law enforcement officer then observed defendant Sung-Kum Choi meet Customer J.S.Y. at a location in Palisades Park, New Jersey. Later that afternoon, a law enforcement officer observed and video recorded defendant Sung-Kum Choi at the NJMVC office located in Lodi, New Jersey. Specifically, the law enforcement officer observed and video recorded Customer J.S.Y. exiting this NJMVC office with documents in his hand and then departing the area. Later that day, a law enforcement observed and video recorded Customer J.K.L. exiting the NJMVC office located in Lodi, New Jersey with documents in his hand and then meeting defendant Sung-Kum Choi in the parking lot.

d. On or about October 28, 2011, over the Second Young-Kyu Park Target Facility, defendant Young-Kyu Park called defendant Sung-Kum Choi. During this intercepted conversation, defendant Young-Kyu Park advised defendant Sung-Kum Choi to never go to the NJMVC offices in North Bergen and Wayne, New Jersey. Defendant Young-Kyu Park added that if the customer had a social security number, then the Customer should be sent to the NJMVC office in Oakland, New Jersey with shorter lines. Finally, defendant Young-Kyu Park noted that the NJMVC office in Lodi, New Jersey was a good location for those without social security numbers and for new applicants [not renewals]. Defendant Sung-

Kum Choi stated that he has his employees drive him to various NJMVC offices. Defendant Young-Kyu Park told defendant Sung-Kum Choi not to enter NJMVC offices with customers but rather educate them well.

e. According to records from the NJMVC, it issued driver's licenses to Customer J.S.Y. and Customer J.K.L. on or about October 28, 2011.

86. Customer T.H.L.

a. According to Cooperating Witness Two, on or about November 7, 2011, he/she and defendant Jong-Hyuk Park met an individual with the initials T.H.L. (hereinafter "Customer T.H.L."). According to Cooperating Witness Two, during this meeting defendant Jong-Hyuk Park collected documents from Customer T.H.L., including a Korean passport, New Jersey driver's license, social security card, a telephone bill, Form I-94, and a U.S. visa for Customer T.H.L. The following day, Cooperating Witness Two provided a copy of these documents to law enforcement.

b. On or about November 14, 2011, defendant Sung-Kum Choi sent an email to defendant Young-Kyu Park, which email was received in the First Young-Kyu Park Email Account. The email's subject line stated, "NJ DL." In this email, defendant Sung-Kum Choi wrote, "President. Hope you had a golden holiday. Sending you three cases." Defendant Sung-Kum Choi then provided the names of three individuals, including Customer T.H.L. In addition, defendant Sung-Kum Choi attached approximately seven documents to the email, including a Korean passport, New Jersey driver's license, social security card, a telephone bill, Form I-94, and a U.S. visa for customer T.H.L. (i.e., a scanned copy of the same documents referred to above).

c. On or about November 18, 2011, Cooperating Witness Two informed law enforcement that he/she and defendant Jong-Hyuk Park would be escorting Customer T.H.L. to a NJMVC office in Somerville, New Jersey. Thereafter, a law enforcement officer near the NJMVC office in Somerville, New Jersey observed and video recorded defendant Jong-Hyuk Park and Cooperating Witness Two escorting Customer T.H.L. into the NJMVC office. According to Cooperating Witness Two, the NJMVC office in Somerville, New Jersey refused to issue the driver's license because the agency could not confirm the receipt on the Forms I-797. Therefore, according to Cooperating Witness Two, they traveled directly to another NJMVC office and, at this office, Customer T.H.L. obtained the driver's license.

d. According to records from the NJMVC, it issued a driver's license to Customer T.H.L. on or about November 18, 2011.

87. Customer K.S.W.

a. On or about November 2, 2011, defendant Sung-Kum Choi sent an email to defendant Young-Kyu Park, which email was received in the First Young-Kyu Park Email Account. In this email, defendant Sung-Kum Choi provided information related to an individual with the initials K.S.W. (hereinafter "Customer K.S.W."). This email contained three attachments, consisting of a scanned copy of a Korean passport, a Tennessee driver's license, and a U.S. visa for Customer K.S.W.

b. On or about November 5, 2011, in Palisades Park, New Jersey, a law enforcement officer observed and video recorded defendant Sung-Hee Bae driving a car and departing a parking lot under defendant Sung-Kum Choi's residence. Defendant Sung-Kum Choi was in the vehicle. Defendant Sung-Hee Bae, with defendant Sung-Kum Choi in the backseat, were observed and video recorded picking up Customer K.S.W. in Palisades Park, New Jersey and then driving this Customer to the NJMVC office in Oakland, New Jersey.

c. According to records from the NJMVC, it issued driver's licenses to Customer K.S.W. on or about November 9, 2011.

88. On or about December 1, 2011, in Palisades Park, New Jersey, Cooperating Witness Two met with defendants Sung-Kum Choi and Jong-Hyuk Park. During this meeting, according to Cooperating Witness Two, defendant Sung-Kum Choi entered a nearby Federal Express mail drop store and retrieved a Federal Express envelope. According to Cooperating Witness Two, defendant Sung-Kum Choi opened the envelope in Cooperating Witness Two's presence, and Cooperating Witness Two observed five Forms I-797. According to Cooperating Witness Two, three of the forms were for Jong-Hyuk Park, one form was for defendant Sung-Kum Choi, and one form was for defendant Sung-Hee Bae. After removing the forms, according to Cooperating Witness Two, defendant Sung-Kum Choi ripped the Federal Express envelope and gave it to Cooperating Witness Two to discard. Instead, Cooperating Witness Two gave the ripped Federal Express envelope to a law enforcement officer. The sender was listed as "HJ Krap" [Hyeun-Jin Park with the last named spelled backwards].

89. On or about March 25, 2012, defendant Young-Kyu Park sent an email to himself from the First Young-Kyu Park Email Account to the same account. The subject line of this email was "President Choi [defendant Sung-Kum Choi] case." In this email, defendant Young-Kyu Park listed approximately forty Customers.

The Park Criminal Enterprise's Source of Fraudulently Obtained Forms I-797: Defendants Martin Trejo and Karine Michmichian

90. Defendant Martin Trejo, a USCIS contract employee, works at the Western Forms Center in Montclair, California. The Western Forms Center is the largest warehouse storage facility for immigration forms in the United States, including Forms I-797. According to records from the United States Department of Homeland Security, Office of Inspector General, defendant Martin Trejo's title is a "Material Handler" and his duties and responsibilities include shipping, receiving, storage, and inventory of USCIS forms. Your Affiant's investigation has revealed that, at the direction of defendant Karine Michmichian and in exchange for money, defendant Martin Trejo steals and fraudulently obtains Forms I-797 and then provides them to defendant Karine Michmichian or others acting at her direction. Thereafter, defendant Karine Michmichian sells and provides the stolen and fraudulently obtained Forms I-797 to defendant Young-Kyu Park and other members of the Park Criminal Enterprise. The Park Criminal Enterprise, as described herein, then alters the Forms I-797 and provides them to Customers to allow them to fraudulently obtain driver's licenses:

91. In early-mid December 2011, the Office of the Inspector General (hereinafter "OIG") for the U.S. Government Printing Office (hereinafter "GPO") provided information regarding the procurement, contract, and shipping of Forms I-797, Notice of Action. The GPO is responsible for printing various government forms, including Forms I-797 and variants. The GPO does not manufacture the forms directly, but contracts the production of these forms to private vendors outside of government facilities. The GPO-OIG reported that Forms I-797 were recently manufactured by two vendors. On or about December 9, 2008, the United States contracted a company in Pennsylvania to manufacture one million Forms I-797. The contract specified that these forms were to be sent to the Western Forms Center. On or about May 12, 2010, the United States contracted with a second company in Pennsylvania to manufacture one million Forms I-797. The contract specified that these forms were to be sent to the Western Forms Center.

92. The September 2010 Transaction

a. According to Cooperating Witness One, in or around late August 2010, defendant Young-Kyu Park stated that he was running low on Forms I-797 that he used as part of the driver's license scheme. According to Cooperating Witness One, defendant Young-Kyu Park reported that these Forms I-797 were genuine and not counterfeit forms; that is, they had been fraudulently obtained. According to Cooperating Witness One, defendant Young-Kyu Park stated that he had known the "female" for approximately ten years, and she had told defendant Young-Kyu Park that she could obtain Forms I-797 in large batches. According to Cooperating Witness One, in or around September 2010, defendant Young-Kyu Park stated that he had contacted the "female," his source for the Forms I-797. Furthermore, according to Cooperating Witness One, defendant Young-Kyu Park advised he and the "female" were negotiating an order of at least 200 Forms I-797 in or around August-September 2010 time frame. Cooperating Witness One's information is corroborated by the telephone records described below:

(1) On or about September 9, 2010, according to telephone records from the First Young Kyu Park Facility and a cellular telephone used by defendant Karine Michmichian (hereinafter the "Michmichian Facility"), the First Young Kyu Park Facility contacted the Michmichian Facility at approximately 7:36 p.m., 7:37 p.m., and 10:37 p.m. (PST).

(2) On or about September 10, 2010, according to telephone records from the First Young Kyu Park Facility, at approximately 2:01 p.m. (PST), the Michmichian Facility contacted the First Young Kyu Park Facility. Immediately after this call, according to telephone records from the Michmichian Facility, at approximately 2:04 p.m. (PST), the Michmichian Facility contacted a cellular telephone used by defendant Martin Trejo (hereinafter the "First Trejo Facility"). Immediately after this call to the First Trejo Facility, at approximately 2:08 p.m. (PST), the Michmichian Facility again contacted the First Young Kyu Park Facility. Later that day, at approximately 3:44 p.m. (PST), the Michmichian Facility called the First Trejo Facility. Immediately after this call, the Michmichian Facility called the First Young Kyu Park Facility at approximately 3:51 p.m. Later that same day, at approximately 5:02 p.m., 5:08 p.m., and 6:52 p.m., the Michmichian Facility contacted the First Young Kyu Park Facility.

(3) According to Cooperating Witness One, defendant Young-Kyu Park often uses the Relative as a translator to communicate with English-speaking individuals. According to telephone records from the Michmichian Facility, on or about September 13, 2010, the Michmichian Facility was in repeated contact with a cellular telephone used by the Relative (hereinafter the "Relative Facility") and the First Trejo Facility.

(4) On or about September 14, 2010, at approximately 11:17 a.m. (PST), the Michmichian Facility called the First Trejo Facility. At approximately 11:19 a.m. (PST), the Michmichian Facility called a telephone used by the Relative, and the Relative then called the Michmichian Facility at 11:21 a.m. (PST). At approximately 12:01 p.m. (PST), the Michmichian Facility called the First Trejo Facility. At 12:17 p.m. (PST), the First Trejo Facility contacted the Michmichian Facility. At approximately 1:00 p.m. (PST), the Michmichian Facility called the Relative Facility.

b. On or about September 15, 2010, according to Confidential Informant One, Young Kyu Park received a Federal Express package from a local delivery mail store in Palisades Park, New Jersey that contained approximately 200 Forms I-797. According to records from Federal Express, on or about September 14, 2010, the Relative, in California, sent a package, via overnight delivery, to defendant Young-Kyu Park, under his alias "Oscar Park."

93. The January-February 2012 Transactions

a. On or about May 9, 2011, over the Cooperating Witness One Facility, Cooperating Witness One received a call from defendant Young-Kyu Park. During this consensually recorded conversation, defendant Young-Kyu Park discussed a recent meeting that he had with the "female." During this consensually recorded conversation, the following conversation ensued, in substance and in part [YKP = defendant Young-Kyu Park and CW1 = Cooperating Witness One]:

YKP: Well-I met with the American person [believed by Your Affiant to be Karine Michmichian].

CW1: Yes.

YKP: I was going to call you if we had trouble communicating.

CW1: Yes.

YKP: I was going to talk with the speaker phone on.

CW1: Yes.
YKP: But the conversation ended well-the person understood what I said and the conversation ended well.
CW1: Yes-yes, good.

* * * *

YKP: So, she said she'll look into it by this week and . . . get back to me. I asked how she did the Social Security and . . . she said she only had the name, date of birth, and names of the parents. . . then, they make it and give it to you with the envelope.

CW1: It's real, right?

YKP: It's probably real since you're doing by giving person's information.

CW1: Yeah.

YKP: I don't know. She said she's going to look into it. She wouldn't lie.

CW1: Yeah.

YKP: I asked for several things when I met with her. We talked for a couple of hours and I came back. . . I did. I don't know-I tried not to meet her if possible but-because a long time ago, I got help from her for many people-

CW1: Yeah.

YKP: By any chance, later [UI]. I met her because I was desperate. I was going to meet her last week but couldn't-she said she had time this Monday so we met. . . . We met but I don't know-Not sure if it'll go well-I should get a response. I gave an offer so she'll call and say she can or cannot do it. And we also talked about marriage visa. . . .

b. According to records from the Michmichian Facility, on or about December 17, 2011, at approximately 8:52 a.m. and 8:54 a.m. (PST), defendant Young-Kyu Park used the First Young Kyu Park Facility to contact the Michmichian Facility; however, these calls were not picked up. On or about December 17, 2011, at 10:05 a.m. (PST), the Michmichian Facility attempted to contact defendant Young-Kyu Park over the First Young Kyu Park Facility. On or about December 19, 2011, at approximately 6:50 a.m. (PST), Young Kyu Park, using the First Young Kyu Park Facility, contacted the Michmichian Facility. At approximately 9:10 a.m. and 10:35 a.m. (PST), the First Young Kyu Park Facility contacted the Michmichian Facility. At approximately 11:15 a.m. (PST), the Michmichian Facility contacted the First Young Kyu

Park Facility. At approximately 11:16 a.m. (PST), the First Young Kyu Park Facility contacted the Michmichian Facility (approximately 1:12 minutes in duration). From approximately 11:18 a.m. to approximately 11:33 a.m. (PST), the Michmichian Facility called the First Trejo Facility approximately eight times. At approximately 11:23 a.m. (PST), the Michmichian Facility sent a text message to the Trejo Facility. At approximately 11:33 a.m., the First Trejo Facility sent a text message to the Michmichian Facility. At approximately 11:40 a.m. (PST), the Michmichian Facility contacted the First Young Kyu Park Facility (approximately 3:47 minutes in duration). At approximately 11:47 a.m., the Michmichian Facility sent a third text message to the First Trejo Facility.

c. On or about December 19, 2011, defendant Young-Kyu Park called Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, defendant Young-Kyu Park stated that he was working on a new scheme. As part of this scheme, defendant Young-Kyu Park explained that he planned to obtain and use a different version of the Form I-797C so his customers could falsely claim to be state residents and thus obtain substantial in-state tuition breaks. Defendant Young-Kyu Park explained that he could falsify these forms and sell them to customers, who in turn could present them to universities as proof of in-state residency. The customers, defendant Young-Kyu Park added, could then receive a tuition break from the universities. Defendant Young-Kyu Park discussed how he now needed the services of the "female," as he planned to order Forms I-797, versions A, B, and C. Defendant Young-Kyu Park stated that he had been using Forms I-797B, the form used by individuals in the process of obtaining green cards. Defendant Young-Kyu Park then stated the following, in substance and in part [YKP = defendant Young-Kyu Park and CW1 = Cooperating Witness One]:

YKP: So, I looked for this person [Your Affiant believes defendant Young-Kyu Park was referring to defendant Karine Michmichian] and I need the documents [forms] . . . but the documents are different. The documents, the documents for green card in progress cases are called 797B. They are. . . . Ours are 797C, you know. The forms are different. Because [the documents for] green card in progress [cases] don't have a line for cut at the bottom. . . . And the color is different. They are in yellowish color. . . . Green cards are different. . . They give a form letter to the person whose application is in receipt. I find

many states give such a letter. So, the one of the reasons I open an office for [defendant Jong-Hyek Park] is that. Of course the DMV thing is there too. . . . This is a thing that requires a lot of calls with schools, so . . . with the boys, and decided to make it and do it. . . . But the schools require original documents. They require to bring original documents, and they take a copy and do it. . . . Once, I found an old one, washed it and used it, but it looked so obvious [fake]. . . . So I wanted to order the original [forms] and tried to contact the person who supplies originals. My calls didn't go through. But succeeded once. (emphasis added) Succeeded. And [the person] said [she] would look for them and they might cost more.

CW1: Yes.

YKP: But, I am in need. . . . I have been snug till now, but I am under pressure now. Because I have to make the documents very shortly. . . . Yesterday and the day before, Saturday and Sunday, my calls were not picked up. A message was received late last night, but I couldn't call back because it was too late.

CW1: To the woman?

YKP: Um. Because I returned at 8 o'clock from the mountain.

CW1: Yes.

YKP: I returned at 8 o'clock. . . . So, anyway, to get those, I have been calling since this morning but they are not picked up. When I talked, [she said] they are available but they might cost more. . . . she will ask about them . . . will ask me to bring the money. . . . Since there are [UI] and I may need to send the money.

d. According to records from the Michmichian Facility, on or about December 20, 2011, the Michmichian Facility called the First Young Kyu Park Facility at 12:09 a.m. (PST) (duration approximately one minute).

e. On or about December 21, 2011, at approximately 11:03 a.m. (EST), Cooperating Witness One received a call from defendant Young-Kyu Park. During this consensually recorded conversation, the following conversation ensued, in substance and in part [YKP = defendant Young-Kyu Park and CW1 = Cooperating Witness One]:

YKP: And then I haven't got the communication yet for the documents. Ugh. I haven't. I haven't got a call. Today. A message. Last night. I found a message received. To me. So, I have to call back shortly. . . . Anyway. That is the situation. So, then, I still have some of the other documents . . . some of them . . . [short pause] . . . the school registration thing, the in-state tuition thing, you know. . . [short pause] Hello?

CW1: If the person sent you a message, I guess the person would take your call. I wonder why?

YKP: Nah. I found it was received late last night. When I woke up this morning. . . the call was . . . I came home very late last night . . . the call was . . . So I have to call back. But I . . . the documents are not a problem. I told you about 797B, which is for getting in-state tuition. I told you it's a little different, you remember?

CW1: Yes-yes. That is the problem now. . . .

YKP: That matter is killing me now. Shit. It is supposed to be submitted soon. So, whatever is happening, since I am returning there [California] on 23rd, so I will try to solve it as quick as possible. Just keep that in mind. But since it doesn't matter with what we are doing. . . . Just know that. Because I still have some of them. Um?

CW1: I've got it.

f. According to records from the Michmichian Facility, on or about December 21, 2011, at approximately 2:24 p.m. (PST), the First Young Kyu Park Facility called the Michmichian Facility (duration 1:35 minutes). At approximately 2:29 p.m. (PST), the Michmichian Facility called the First Young Kyu Park Facility (duration 2:29 minutes). At approximately 2:37 p.m. (PST), the First Young Kyu Park Facility called the Michmichian Facility (duration 1:36 minutes).

g. On or about December 21, 2011, at approximately 8:04 p.m. (EST), Cooperating Witness One called defendant Young-Kyu Park over the Cooperating Witness Facility. During this consensually recorded conversation, the following conversation ensued, in substance and in part [YKP = defendant Young-Kyu Park and CW1 = Cooperating Witness One]:

YKP: I contacted [the person] todayI contacted I got the response. [The person] gave me the response. I asked for 50 sheets of school registration thing and 100 sheets only [of other thing]. This person told me that it should be exactly like what we did before . . . that response was received. And so, I told I would contact about the matter in early January [2012].

CW1: Yes.

YKP: And I asked for 10 sheets of school registration for now at any price [the person] wants, so it was agreed to get them on Monday. [This meeting was later changed to after the New Year].

CW1: Um.

YKP: Um. So, I think the deal will go though. Because, the money is, about \$100,000 is at stake, and do you think the person would walk away? [UI] after getting the promise, [UI], I guess [the person] will make calls about it. We agreed to talk on Monday [short pause] since I am out for dinner, I will call again later.

CW1: Yes, I see.

YKP: Okay. Um. Later.

CW1: Yes-yes.

h. On or about December 23, 2011, Cooperating Witness One called defendant Young-Kyu Park over the Cooperating Witness One Facility. During this consensually recorded conversation, Cooperating Witness One asked if the "the thing" [a reference to the purchase of the Forms I-797] was going well. Defendant Young-Kyu Park asked if Cooperating Witness One meant "the document" and stated they had made an agreement to contact each other early next year regarding the documents. Defendant Young-Kyu Park stated he was asked to take the same amount as he did before, and Defendant Young-Kyu Park stated that he thought there would be many Customers in Nevada because doing it in Seattle had become difficult. Defendant Young-Kyu Park stated that he asked the person to supply 100 plus sheets and stated that he made three [meaning \$300,000] during the last two months, paid back \$200,000, and paid \$100,000 to Korea. Defendant Young-Kyu Park stated that the person [believed by Your Affiant to be defendant Karine Michmichian] asked for \$200,000. Defendant Young-Kyu Park further stated that he told the person that he would need twenty or thirty sheets of the school thing, six sheets at first, and the person agreed to give them-free of charge, in return for doing the other, as before. [Your Affiant submits that defendant Young-Kyu Park requested approximately twenty or thirty of the Forms I-797 variants to try the tuition scheme, and defendant Karine Michmichian agreed to give him approximately six samples

of these forms for free, with the understanding that the bulk purchase would follow]. Defendant Young-Kyu Park wondered who were the sources of these forms, and he speculated it could be a custodian in the office. Cooperating Witness One then asked if the money was ready, and defendant Young-Kyu Park replied that he had \$100,000 ready, and thinks he would get approximately 100 sheets, maybe a little more for that, but he would need \$200,000 if he wants to do as the person demands.

i. On or about December 24, 2011, at approximately 9:53 a.m. (EST), Cooperating Witness One called defendant Young-Kyu Park. During this consensually recorded conversation, the following conversation ensued, in substance and in part [YKP = defendant Young-Kyu Park and CW1 = Cooperating Witness One]:

CW1: Will you keep staying in Nevada?

YKP: Um, I will be. On 27th I will go to L.A.

CW1: Ah, you go around 27th?

YKP: I will go to LA on 27th and stay there until January 5th, January 6th. Stay until January 6th. . . . And return here.

j. On or about December 24, 2011, at approximately 11:47 a.m. (EST), Cooperating Witness One received a call from defendant Young-Kyu Park. During this consensually recorded conversation, the following conversation ensued, in substance and in part [YKP = defendant Young-Kyu Park and CW1 = Cooperating Witness One]:

YKP: The, the, I have, by now, 38, about 40 documents now. [defendant Young-Kyu Park had approximately 38 to 40 I-797A/B remaining]. . . . If, by any chance . . . I will do it anyway. . . . In January, I will do it . . . 100 sheets or more . . . I plan to do it once more at least. Because . . . I got to think that I will do it until February or March . . . will do it until March. . . . So, early January, after the holidays, if it happens, I think there will be bunches [of customers] coming. In fact, in Virginia, if a person like me or you go there and stay. . . .

* * * *

CW1: President When do you plan to make the purchase?

YKP: Umm. I am going to . . . next week . . . not next week, in early January, will do it. That's what I will do . . . so

k. On or about December 26, 2011, at approximately 12:25 p.m. (EST), defendant Young-Kyu Park called Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, the following conversation ensued, in substance and in part [YKP = defendant Young-Kyu Park and CW1 = Cooperating Witness One]:

CW1: If by any chance . . . when you make the purchase . . . if you need . . . inform me again. I may be able to do it by then.

YKP: January, January, anyway, what's that, around next week, I am going to . . . because of the tuition thing. . . . Even though I may need to pay more, I plan to do it for now. Because, they accept original documents only. . . . That, they need to file it. I heard they may submit it by January 9th. . . . So after submitting it, I am going to see. For now, I am going to try. Because if I start it, since I am going to try it for 50 sheets. . . . If it doesn't succeed, they will be just useless trash. . . . So, for now, I want just several sheets. Even though I may need to pay a little more. I said I just want to try it, I don't know if this will be accepted or not. . . . After trying it like that, and if it succeeds, I will, for a bundle. . . I will run them. For once more.

CW1: I wonder if they'd give them like that?

YKP: Well, I am going to try to suggest like that. Early next week. I told, Sean [Jong-Hyuk Park] told them so.

CW1: Yes.

YKP: [Defendant Jong-Hyuk Park said] My father needs 'B' rather than those. There are 797C and B, you know. . . . What is submitted is B. . . . When I say I will try several and do it . . . because I am not asking a lot. . . . I think she will agree to it. And also because the guy is not in such a relation with me.

CW1: Yes.

YKP: I have been dealing . . . in such a nice manner.

CW1: I think it's lucky if she agrees to do so.

YKP: So after trying it, I will run them. Since I will run them just once more.

1. On or about December 27, 2011, the Michmichian Facility communicated with a cellular telephone issued by the United States government to defendant Martin Trejo (hereinafter the Second Trejo Facility) through a series of text messages, as summarized below:

Approximate Time	From	To	Text
9:09 a.m. (PST)	Michmichian Facility	Second Trejo Facility	"Marty I'll c u [see you] at 12.1d [sic] for lunch"
9:11 a.m. (PST)	Second Trejo Facility	Michmichian Facility	"Ok. With the \$ right?"
9:11 a.m. (PST)	Michmichian Facility	Second Trejo Facility	"Yes"
9:12 a.m. (PST)	Second Trejo Facility	Michmichian Facility	"Ok"
12:34 p.m. (PST)	Michmichian Facility	Second Trejo Facility	"Almost there"

m. On or about December 28, 2011, defendant Young-Kyu Park called Cooperating Witness One over the Cooperating Witness One Facility. During this consensually recorded conversation, the following conversation ensued, in substance and in part [YKP = defendant Young-Kyu Park and CW1 = Cooperating Witness One]:

YKP: Just last night. I told you that I accepted 6 persons [customers] from Virginia.

CW1: Yes? Are you saying that you received the money?

YKP: I mean, six person, from Virginia, while doing the driver licenses, aren't you talking about the students, in-state tuition thing?

CW1: Yes, that's right. Ahh, you mean you took them, cases?

YKP: Um. Six persons. I received the money also.

CW1: Yes-yes.

YKP: At first, I thought I could just give a copy, but they [the schools] require originals.

CW1: Yes.

YKP: So it became a problem. So it comes to that I need to prepare them. . . . I asked [someone] to supply 6 sheets only for now, saying that I have 6 people I agreed to do it. So today or tomorrow. But one fortunate thing is that they may submit it to school by January 9th.

* * * *

YKP: So, I will know only after I meet [someone] today or tomorrow. I told you yesterday that I would . . .

n. On or about January 2, 2012, defendant Young-Kyu Park sent an email from the Second Young-Kyu Park Email Account to Cooperating Witness One. In this email, defendant Young-Kyu Park wrote the following:

Note that we [previously] used [I-797] A [and] B. There is a C but A is for "Primary" [English] approved person, B is for "Dependent" [English] approved person, C is a receipt for all immigration documents, or acts as the "petition" [English] sent to the attorney, permanent legal status receipt sent to the customer, or approved person document. However, we started out using only the A, then in the middle used B. This is because they said it was hard to get the A, but both A and B have the tear line and can both be used without any problems, which is why we just used [them both]. But C does not have the tear line and cannot be used for the same purposes as A or B. . . . If you have some extra money that will not burden you then I wish for you to deposit \$20,000 by this Friday. If you can do this, it will be better to deposit with a check rather than cash. It is okay if you cannot do this [deposit money]. This time I talked it over with my wife and agreed to do it once again. Whatever I am short I will [make up] by using a few months of my daughter's money. I should be helping you out, but if you can give me the \$20,000 that I am asking of you, then I will send you 11 sheets that you can [resell] to someone you know or use it personally to help yourself. Do not misunderstand my mentioning the documents because the reason I am telling you about the documents is because I think you probably have personal cases of your own. So I desire to provide you with at least that benefit. If the job finishes before you are able to use all of it [the forms] then I will be sure to return [the money] to you. As stated in the beginning, if you have some extra money but spent it somewhere else or need to spend it somewhere else, then that is okay and do not feel burdened. If you have it [the money for me] then

I wish to get it by Friday. I will diligently get [more] cases and contact you.

o. According to Cooperating Witness One, defendant Young-Kyu Park obtained additional Forms I-797. On or about February 2, 2012, at approximately 8:03 p.m. (PST), defendant Young-Kyu Park used another cellular telephone (hereinafter the "Third Young-Kyu Park Facility") to make an outgoing call to the Michmichian Facility. This call was approximately two minutes in duration. On the same day, at approximately 8:07 p.m. (PST), the Michmichian Facility sent the following text message to the Second Trejo Facility: "Need 200 (A) call me asap, please, valentines is coming." [Your Affiant believes that "200 (A)" was a reference to Forms I-797A]. On that same day, at approximately 8:38 p.m. (PST), the Michmichian Facility sent the following text message to the Second Trejo Facility: "Dude please call" On the same date, at approximately 9:17 p.m., the Third Young-Kyu Park Facility contacted the Michmichian Facility. On this same date, at approximately 10:13 p.m. (PST), the Michmichian Facility sent a text message to the Second Trejo Facility: "Call me please."

p. On or about February 3, 2012, at approximately 10:03 a.m (PST), the Michmichian Facility sent a text message to the Second Trejo Facility, stating "Dude cme [come] on what's up marty." Later that day, at approximately 10:33 a.m. (PST), the Third Young-Kyu Park Facility attempted to contact the Michmichian Facility. Approximately two minutes later, at approximately 10:35 a.m. (PST), the Michmichian Facility sent two separate text messages to the Second Trejo Facility: first, "Marty can u call me please I need 200 of the A asap," [a reference to 200 Forms I-797A]; and second, "Answer ur [your] phone please its Friday so I can meet u [you] tomorrow." On this same date, at approximately 10:48 a.m. (PST), a call attempt was made from the Michmichian Facility to the Second Trejo Facility, and a text message was sent from the Michmichian Facility to the Second Trejo Facility at approximately 10:48 a.m. (PST), stating, "Dude come on call me please." Later that day, at approximately 1:11 p.m. (PST) the Michmichian Facility attempted to make a call to the Second Trejo Facility, and at approximately 1:28 p.m. (PST) the Michmichian Facility made an outgoing call to the Second Trejo Facility (approximately 1:21 minutes in duration).

q. On or about February 4, 2012, at approximately 9:47 a.m. (PST), an unanswered call was placed by the Second Trejo Facility to the Michmichian Facility. At approximately 10:07 a.m., the Michmichian Facility sent a text message to the Second Trejo Facility, seeking to meet. At approximately 10:31 a.m. (PST), the Michmichian Facility placed a call (approximately

1:01 minutes in duration call) to the First Trejo Facility. At approximately 10:32 a.m. (PST), the Michmichian Facility sent a text message to the Second Trejo Facility, stating "Is 12 afternoon good for u," and at approximately 10:44 a.m. (PST), the Michmichian Facility placed a call (approximately 1:11 minutes in duration) to the Second Trejo Facility.

r. On or about February 5, 2012, at approximately 8:46 p.m. (PST), the Third Young-Kyu Park Facility made an outgoing call to the to the Michmichian Facility (approximately 2:58 minutes in duration).

s. On or about February 6, 2012, the Michmichian Facility sent a text message to the Second Trejo Facility, stating, "I need to go get the \$ from him and head to u [you]." On the same day, at approximately 11:02 a.m. (PST), the Second Trejo Facility sent a text message to the Michmichian Facility, stating "ok c u at 12:30 same plc." Later that day, at approximately 11:22 a.m. (PST), the Michmichian Facility contacted the Third Young-Kyu Park Facility (approximately 1:07 minutes in duration) and at 11:39 a.m. (PST). Thereafter, at approximately 11:43 a.m. (PST), the Michmichian Facility sent a text message to the Second Trejo Facility, stating, "Waiting for him to get me the \$ so I can leave, the original guy is out of town and this douchebag is sick, so let me put it together for u [you]." On or about 11:50 a.m. (PST), the Michmichian Facility sent a text message to the Second Trejo Facility, stating, "The original guy was ready to c [see] me Saturday but we didn't have the right one, he left to nj Sunday and this guy who I need to meet is sick in bed." In a subsequent text message at 11:50 a.m. (PST) from the Michmichian Facility to the Second Trejo Facility, defendant Karine Michmichian wrote: "And took some meds can't go to the bank." One minute later, she again texted the Second Trejo Facility, "Its all good but I'm waiting to pick up ur [your] money." Later that day, at approximately 1:07 p.m. (PST), the Michmichian Facility sent a text message to the Second Trejo Facility, stating "Can u get me one or two (B)." [a reference to Forms I-797B].

t. According to Cooperating Witness One, defendant Young-Kyu Park stated that defendant Jong-Hyuck Park had picked up the Forms I-797 while defendant Jong-Hyuck Park was in the Los Angeles area.

Financial Transactions Conducted by the Park Criminal Enterprise

94. From on or about February 9, 2011 to on or about February 12, 2012, approximately \$138,350 in cash deposits were made into the Soong-Young Park Bank of America Account. At the direction of defendant Young-Kyu Park, Cooperating Witness One made several cash deposits into this account, which deposits, according to Cooperating Witness One, represented the proceeds of the driver's license scheme from New Jersey Customers. These deposits, made in New Jersey, include the following:

Approximate Post Date of Deposit	Type of Transaction	Approximate Amount
September 1, 2011	Cash	\$3,000
October 3, 2011	Cash	\$3,000
November 14, 2011	Cash	\$2,000
November 15, 2011	Cash	\$3,000
December 7, 2011	Cash	\$8,900
December 30, 2011	Cash	\$3,000
January 23, 2012	Cash	\$2,900
Total		\$25,800

95. After the cash deposits described above were made into the Soong-Young Park Bank of America Account, the following financial transactions were made with this account:

a. On or about September 2, 2011, approximately five cash withdrawals, totaling approximately \$5,622, were made at a casino in California.

b. On or about October 3 and 4, 2011, approximately three cash withdrawals, totaling approximately \$3,000, were made at two casinos in Las Vegas, Nevada.

c. On or about November 18, 2011, approximately one cash withdrawal, totaling approximately \$5,000, was made at a bank in Las Vegas, Nevada.

d. On or about December 9, 2011, a check, in the approximate amount of \$8,000 was issued and drawn against the Soong-Young Park Bank of America Account.

e. On or about January 3, 2012, approximately one cash withdrawal, totaling approximately \$9,300, was made at a casino in California. On the same day, approximately one cash withdrawal, totaling approximately \$1,000, was made at another casino in California.