

ATTACHMENT A

Count One (Conspiracy to Unlawfully Produce Identification Documents)

From on or about August 13, 2010 through on or about September 10, 2010, in Bergen County, in the District of New Jersey and elsewhere, defendants Yu-Je Jo, a/k/a "Richard," and Jong-Nam Kim, a/k/a "Peter," "Brian Kim," and "Yin Shan," knowingly and without lawful authority conspired and agreed with each other and others to produce identification documents, namely, a driver's license issued by the California Department of Motor Vehicles and a passport, in or affecting interstate and foreign commerce, contrary to Title 18, United States Code, Section 1028(a)(1), (b)(1), (c)(3)(A), in violation of Title 18, United States Code, Section 1028(f).

Count Two (Unlawfully Selling a Social Security Card)

On or about September 10, 2010, in Bergen County, in the District of New Jersey and elsewhere, defendants Yu-Je Jo, a/k/a "Richard," and Jong-Nam Kim, a/k/a "Peter," "Brian Kim," and "Yin Shan," for purpose of obtaining a thing of value, namely, money from another person, knowingly sold and possessed with intent to sell a social security card, as described in Attachment B, in violation of Title 42, United States Code Section 408 (a)(7)(C) and Title 18, United States Code, Section 2.

ATTACHMENT B

I, Nathan D. Kim, 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 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. Your Affiant is also fluent in the Korean language. 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.

1. At all times relevant to this Criminal Complaint:

a. Defendant Yu-Je Jo was a resident of Ridgefield, New Jersey.

b. Defendant Jong-Nam Kim was a resident of Ridgefield, New Jersey.

2. On or about August 13, 2010, a confidential informant, acting at the direction of law enforcement ("Confidential Informant"), met with defendants Yu-Je Jo and Jong-Nam Kim at a location in Palisades Park, New Jersey. This meeting was consensually recorded (audio and video) and occurred in the Korean language. During this consensually recorded meeting, defendant Jong-Nam Kim, who initially appeared at the meeting alone, explained to the Confidential Informant the process for fraudulently obtaining a driver's license using another person's social security card. Specifically, defendant Jong-Nam Kim explained that he could broker and sell the Confidential Informant a social security card in the "600" series belonging to another person.

3. Based on my participation in this investigation and related investigations, Your Affiant knows that individuals profit by obtaining, brokering, and selling genuinely issued social security cards and numbers belonging to other people. These social security cards and numbers are then used to obtain identification cards, driver's licenses, and other identity documents. These identity documents are then used to open bank accounts, apply for loans, and obtain credit cards for the purpose of committing a myriad of financial frauds.

4. During the consensually recorded meeting, defendant Jong-Nam Kim explained that it takes approximately two weeks to obtain a social security card. After obtaining the social security card, defendant Jong-Nam Kim stated that the Confidential Informant would fly to Los Angeles, California to obtain the driver's license using the social security card in another person's name (hereinafter the "Fraudulent Identity"). After obtaining the California driver's license, defendant Jong-Nam Kim explained that the credit score related to the Fraudulent Identity would be built. [Based on this investigation and related investigations, Your Affiant knows this "credit build up" is accomplished by taking the fraudulently acquired alias and corresponding social security number and attaching that identity, as an authorized user, to various co-conspirators' credit card accounts. By attaching these fraudulently obtained identities to credit card accounts, the co-conspirators fraudulently and artificially increase the credit scores associated with the identities. These credit scores are relied on by banks, credit card companies, finance companies, and lenders, among others, when deciding whether or not to issue credit or grant loans to consumers. In reality, the co-conspirators who provide this "credit build up" service neither know the actual person in whose name the build up is being conducted (i.e., the identity related to the fraudulently obtained social security card) nor, in virtually every instance, the customer (i.e., the individual using the purchased identity). The sole purpose of credit build up is to facilitate the commission of bank fraud, credit card fraud, and other crimes].

5. Later during the same meeting, defendant Jong-Nam Kim further explained that the credit build up scheme would begin whereby, for approximately two to three months, the credit score related to the Fraudulent Identity would be increased so that the Confidential Informant, using the Fraudulent Identity, could obtain credit cards.

6. Defendant Yu-Je Jo thereafter joined the meeting and explained that the Confidential Informant could, using the Fraudulent Identity, make between \$30,000 and \$40,000 from a credit card scheme; between \$25,000 and \$35,000 by obtaining a personal line of credit; and approximately \$60,000 by engaging in a check cashing scheme [which scheme Your Affiant knows to be check-kiting]. Defendant Jong-Nam Kim stated that after the credit build up, the Confidential Informant, again using the Fraudulent Identity, could expect to make between approximately \$80,000 and \$150,000 through the scheme. Defendant Jong-Nam Kim also stated that the Confidential Informant had the option of shopping in Las Vegas, whereby the Confidential Informant could purchase high-end products such as Rolex watches, Chanel products, and Louis Vuitton brand products with credit cards obtained using the Fraudulent Identity.

7. During this same meeting, defendant Yu-Je Jo advised the Confidential Informant that it would cost him/her approximately \$8,000 up front and \$7,000 later for the social security card, driver's license, and credit build up. The Confidential Informant attempted to negotiate the price, and asked whether defendant Yu-Je Jo or defendant Jong-Nam Kim determined the price for the services. Defendant Yu-Je Jo stated that he and defendant Jong-Nam Kim have different responsibilities in the scheme but that pricing generally is defendant Yu-Je Jo's responsibility. Thereafter, defendant Yu-Je Jo agreed to provide the services to the Confidential Informant for approximately \$14,000 and told the Confidential Informant that he/she would have to pay \$7,000 up front and \$7,000 after the Confidential Informant obtained the California driver's license.

8. Defendant Yu-Je Jo instructed the Confidential Informant to bring a few passport photos for their next meeting. Defendant Yu-Je Jo then told the Confidential Informant that it would take one week to ten days to obtain a forged passport. Defendant Yu-Je Jo explained that although the forger is in New Jersey, it takes some time to create the passport because many people use the same passport (i.e., the same passport is forged for different people).

9. On or about August 20, 2010, the Confidential Informant met defendants Yu-Je Jo and Jong-Nam Kim at a location in Palisades Park, New Jersey. During this consensually recorded meeting (audio and video), defendant Yu-Je Jo provided the Confidential Informant with a break down of the prices: \$4,000 for the social security card; \$1,000 for the forged passport; \$3,000 for the driver's license; and \$7,000 for the credit build

up related to the Fraudulent Identity. The Confidential Informant then gave \$4,000 in cash to defendant Yu-Je Jo, who counted the money in front of the Confidential Informant (and captured the exchange on the audio and video recording equipment). The Confidential Informant then asked defendant Jong-Nam Kim, who had briefly exited the room when the Confidential Informant provided the money to defendant Yu-Je Jo, for a receipt. Defendant Jong-Nam Kim told the Confidential Informant that he would give the Confidential Informant a receipt at their next meeting.

10. On or about August 31, 2010, the Confidential Informant met defendants Yu-Je Jo and Jong-Nam Kim and an unknown Korean-speaking female, who was introduced as another "customer," at a location in Palisades Park, New Jersey. During this consensually recorded meeting (audio and video), the Confidential Informant provided four passport photos to defendant Yu-Je Jo for the forged passport. Thereafter, the Confidential Informant, in the presence of defendant Jong-Nam Kim and the unknown female, provided defendant Yu-Je Jo with \$3,000 in cash. Defendant Yu-Je Jo counted the money twice.

11. On or about September 10, 2010, the Confidential Informant met defendants Jong-Nam Kim and Yu-Je Jo at Hwangini, a room salon located in North Bergen, New Jersey. This meeting was consensually recorded (audio). During this meeting, defendant Jong-Nam Kim left the room salon, retrieved an item from a white 2011 BMW parked in the parking lot, returned to the room salon, and handed the Confidential Informant an envelope containing a social security card. This social security card is a "600" series number and bears a Korean name (not belonging to either defendant or to the Confidential Informant). Furthermore, according to a federal law enforcement database, this social security card was genuinely issued by the United States, and it was not issued to defendants Jong-Nam Kim and Yu-Je Jo or the Confidential Informant.

12. According to records, including photographs, from the Illinois Department of Motor Vehicles, on or about September 26, 2007, defendant Jong-Nam Kim, using the Chinese name Yin Shan and a corresponding 586 social security number, applied for and obtained an Illinois identification card (with photograph) and an Illinois driver's license (with photograph) in the name of Yin Shan. The United States did not issue this social security card to defendant Jong-Nam Kim.