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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : CRIMINAL COMPLAINT  
v. :  
SU-CHIN LEE, : Mag No. 10-4164 (CCC)  
a/k/a "Hongying Yang"

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.

  
\_\_\_\_\_  
Heather F. Philpott, Special Agent  
Immigration and Customs  
Enforcement

Sworn to before me and subscribed in my presence,  
September 15, 2010, at Newark, New Jersey

HONORABLE CLAIRE C. CECCHI  
UNITED STATES MAGISTRATE JUDGE

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

ATTACHMENT A

**Count One (Unlawfully Producing an Identification Document)**

On or about December 10, 2008, in Bergen County, in the District of New Jersey and elsewhere, defendant Su-Chin Lee, a/k/a "Hongying Yang," knowingly and without lawful authority produced, and caused and aided in the production of, an identification document, namely, an identification card, issued by the Pennsylvania Department of Transportation, in the name of "Hongying Yang," in or affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1028(a)(1), (b)(1), (c)(3)(A), and Title 18, United States Code, Section 2.

**Count Two (Unlawful Use of a Social Security Number)**

On or about December 10, 2008, in Bergen County, in the District of New Jersey and elsewhere, defendant Su-Chin Lee, a/k/a "Hongying Yang," with intent to deceive, falsely represented a number to be the social security number assigned to her when such number was not assigned to her, for the purpose of obtaining a thing of value, namely, an identification card issued by the Commonwealth of Pennsylvania, in violation of Title 42, United States Code Section 408(a)(7)(B) and Title 18, United States Code, Section 2.

**Count Three (Access Device/Credit Card Fraud)**

From in or about January 2009 to in or about November 2009, in Bergen County, in the District of New Jersey and elsewhere, defendant Su-Chin Lee, a/k/a "Hongying Yang," with intent to defraud, used one or more unauthorized access devices during any one-year period, and by such conduct obtained things of value aggregating \$1,000 or more during that period, in violation of Title 18, United States Code, Section 1029(a)(2) and Title 18, United States Code, Section 2.

## ATTACHMENT B

I, Heather F. Philpott, am a Special Agent with Immigration and Customs Enforcement. 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, these statements are related in substance and in part. 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, defendant Su-Chin Lee, a/k/a "Hongying Yang," was a resident of Palisades Park, New Jersey.

2. On or about August 31, 2008, defendant Su-Chin Lee obtained a New Jersey driver's license (with photograph) from the New Jersey Department of Motor Vehicles. Defendant Su-Chin Lee used a social security number beginning with the digits 618 when she obtained this New Jersey driver's license. Your Affiant believes that defendant Su-Chin Lee is of Korean descent.

3. On or about December 10, 2008, defendant Su-Chin Lee, using the Chinese name "Hongying Yang," obtained an identification card (with photograph) issued by the Pennsylvania Department of Transportation (hereinafter "PennDOT") in the name of "Hongying Yang." Defendant Su-Chin Lee used a social security number corresponding with the name "Hongying Yan" and beginning with the digits "586" to obtain the identification card. This social security number was not assigned to her by the Commissioner of Social Security.

4. Your Affiant has reviewed the photograph used by defendant Su-Chin Lee to obtain her New Jersey's driver's license and compared that image with the photograph from the PennDOT identification card in the Chinese name "Hongying Yang." Your Affiant believes that the person depicted in each of these documents is the same person.

5. Beginning in or about January 2009, defendant Su-Chin Lee, using the Chinese identity "Hongying Yang" and a corresponding 586 social security number, applied for and received credit cards from Chase, Citibank, Bloomingdale's, Macy's, and PNC bank. According to records from Macy's and Bloomingdale's, the application for these credit cards reflected that the person using the name Hongying Yang provided an identification from the Commonwealth of Pennsylvania with a corresponding identification number. The identification number used on these applications corresponds to the identification number on the identification card obtained by defendant Su-Chin Lee, as described in Paragraph 3 above.

6. According to records provided by the credit card companies and a credit reporting agency, these fraudulently acquired credit cards were used to make fraudulent charges that were never paid. For instance, on or about February 4, 2009, defendant Su-Chin Lee obtained a cash advance, in the approximate amount of \$10,000, by issuing herself a Chase bank convenience check, in the name of "Hongying Yang." This convenience check was charged to a Chase credit card defendant Su-Chin Lee had obtained in the Chinese name "Hongying Yang" ("Chase Credit Card One"). On or about March 10, 2008, a payment in the amount of \$9,800 was made to Chase Credit Card One from a bank account with insufficient funds. Thereafter, from on or about March 11, 2009 to on or about March 13, 2009, defendant Su-Chin Lee purchased approximately \$9,400 worth of gift cards using Chase Credit Card One.

7. Your Affiant knows, based on my education, training, and experience, that as part of these "bust out schemes," individuals will make charges on credit cards, usually at or near the maximum credit limit on the credit card, and thereafter submit a payment for those charges with a check with insufficient funds. After the credit card receives the payment but before the check clears (i.e., the "float" period), the credit card company credits this payment against the account, thereby permitting the possessor of the credit card or credit card number to make additional charges against the account. Thereafter, the individual makes additional charges against the credit card with no intent to pay for any of these charges.

8. According to records provided by Chase credit card company, these charges were not paid and a total loss amount of approximately \$21,000 was reported for Chase Credit Card One.

9. From in or about January 2009 to November 2009, defendant Su-Chin Lee made charges on other credit cards issued in the name of Hongying Yang, including approximately \$7,000 to a second Chase credit card; approximately \$750 to a Citibank credit card; approximately \$3,000 to a Bloomingdale's credit card; approximately \$1,200 to a Macy's credit card; approximately \$7,000 to a second Macy's credit card; approximately \$20,000 to a third Macy's credit card; and approximately \$10,000 to a PNC Bank credit card. According to records provided by a credit reporting agency, these charges were not paid, resulting in a loss of approximately \$49,000.

10. In or about January 2009, defendant Su-Chin Lee, using the Chinese name "Hongying Yang" and a corresponding social security number beginning with the digits 586, applied for and obtained a line of credit for \$10,000 from Citibank. Defendant Su-Chin withdrew the full \$10,000 from Citibank using this line of credit. According to records provided by a credit reporting agency, the loan was not paid, resulting in a total loss of approximately \$10,000.