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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : CRIMINAL COMPLAINT  
v. :  
SANG-HYUN PARK, et al. : Mag No. 10-4147 (CCC)

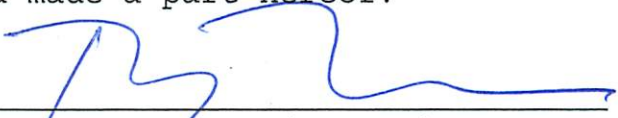
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

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 September 15, 2010, at Newark, New Jersey

HONORABLE CLAIRE C. CECCHI  
UNITED STATES MAGISTRATE JUDGE

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

ATTACHMENT A

Count One (Conspiracy)

From in or about June 2006 through on or about the date of this Criminal Complaint, in Bergen County, in the District of New Jersey and elsewhere, defendants

Known Name	Alias(es)
Sang-Hyun Park	"Jimmy," "Jianfang Jiang," and "Zhen Li"
Hyun-Jin LNU [last name unknown]	"Hai Hua Xu"
Dong-Il Kim	"Cai Juan Zhang," and "Zhankun Liu"
Sung-Sil Joh	"Jenny," and "Zhanhong Fan"
Joong-Hyun Jung	
Osung Kwon	"Xiaoling Zhang"
Jin LNU	"Jin," "Zhaofang Chen," and "Jianxin Jiang"
Min-Soo Son	"Chris"
Young-Hee Ju	"Stephanie," and "Mingji Piao,"
Hyo-Il Song	"Daniel," "Yan Hua Wei," "Haizhe Pei," "Minghao Li," and "Dongyun Zhou"
Dong-Won Kim	"Andy Kim," "Guangying Zhang," "Huaying Lu," and "Wei Yun Zhong"

Known Name	Alias(es)
Seung-Ho Noh	"Peter," "Mr. Park," "Zhong Z. Yin," "Chae Yoon Lim," and "Zhiqing Zhang"
Matthew J. Kang	"Jun-Yong Kang"
Rita S. Kim	"Rita Han"
Hyon-Suk Chung	"Clara"
Young-Woo Ji	"Fei Chen"
Sang-Kyu Seo	
Hyun-Yop Sung	"Shanji Li"
FNU [first name unknown] LNU#1	"Mr. Choi," and "Xijun Gu"
Hyeon-U Kim	"Deshang Zhang," and "Xiurong Xu"
Edward M. Ha	
Jong-Hoon Kim	"John," "Zhengshu An," "Ruiping Chen," and "Chun Shi Huang"
Chi-Won Jeon	"Xianzi Luo," and "Fengling Jin"
Jung-Hyuck Seo	"Xiaoqin Zhang"
Jong-Kwan Hong	"Dongshu Li"
In-Sook Lee	"Susan," and "Ping Fang"
Sung-Rok Joh	"Zhang Li"
Jung-Bong Lee	"Hong Guo Cui," and "Wei Xiang Lu"
Hye-Won Jung	"Meihong He"
Son-Hee Chong	"Mingshun Yuan"
In-Suk Joo	"Danhua Wang"

Known Name	Alias(es)
Byung Jang	"Pyung-Hak Jang," and "Xue Hui Shi"
Amy Yang	"Sung-Cha Yang," "Yulan Qian" and "Amy Pitts"
Song-Ja Park	"Run Hong Liu"
Min-Jun Kwon	"Kwon Yi"
Jung-Sook Ko	"Grace S. Lim," and "Haishun Jin"
Myung-Kyun Ko	"Longnan Cui"
Yoon-Hee Park	"Yun-Hee Park," "Zhangqi Zhang," and "Xiaofang Zhu"
Alex S. Lee	"Yicun Zhu," and "Yun Hu"
Kyung-Ki Kim	"Yuting Zhao"

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

- (1) producing without lawful authority identification documents and false identification documents, in and affecting interstate and foreign commerce, contrary to Title 18, United States Code, Section 1028(a)(1) and (c)(3)(A);
- (2) knowingly transferring, possessing, and using, without lawful authority, a means of identification of another person with intent to commit and in connection with unlawful activity that constitutes a violation of federal law, including credit card fraud (18 U.S.C. § 1029), mail fraud (18 U.S.C. § 1341), wire fraud (18 U.S.C. § 1343), bank fraud (18 U.S.C. § 1344), and buying and selling social security cards and numbers (42 U.S.C. § 408), in and affecting interstate and foreign commerce, contrary to Title 18, United States Code, Section 1028(a)(7);

- (3) buying and selling social security cards for the purpose of obtaining things of value, contrary to Title 42, United States Code, Section 408(a)(7)(C); and
- (4) with intent to defraud, trafficking in and using one or more unauthorized access devices during any one-year period, and by such conduct obtaining things of value aggregating \$1,000 or more during that period, contrary to Title 18, United States Code, Section 1029(a)(2).

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 Paragraphs 50 through 114 below of Attachment B.

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

**Count Two (Aggravated Identity Theft)**

From in or about January 2009 through in or about October 2009, in Bergen County, in the District of New Jersey and elsewhere, defendants

Sang-Hyun Park,  
a/k/a  
"Jimmy,"  
"Jianfang Jiang," and  
"Zhen Li," and

Hyun-Jin LNU,  
a/k/a  
"Hai Hua Xu,"

during and in relation to violations of federal law, namely, credit card fraud (18 U.S.C. § 1029), mail fraud (18 U.S.C. § 1341), wire fraud (18 U.S.C. § 1343), bank fraud (18 U.S.C. § 1344), and fraud relating to social security cards and numbers (42 U.S.C. § 408), knowingly transferred, possessed, and used, without lawful authority, the means of identification of another person, namely, Y.L., as described below in Attachment B, in violation of Title 18, United States Code, Section 1028A and Section 2.

**Count Three (Aggravated Identity Theft)**

From in or about January 2009 through in or about July 2009,  
in Bergen County, in the District of New Jersey and elsewhere,  
defendant

Young-Hee Ju,  
a/k/a  
"Stephanie" and  
"Mingji Piao,"

during and in relation to violations of federal law, namely,  
credit card fraud (18 U.S.C. § 1029), mail fraud (18 U.S.C. §  
1341), wire fraud (18 U.S.C. § 1343), and fraud relating to  
social security cards and numbers (42 U.S.C. § 408), knowingly  
transferred, possessed, and used, without lawful authority, the  
means of identification of another person, namely, Mingji Piao,  
as described below in Attachment B, in violation of Title 18,  
United States Code, Section 1028A and Section 2.

**Count Four (Aggravated Identity Theft)**

In or about February 2009, in Bergen County, in the District of New Jersey and elsewhere, defendant

Hyo-Il Song,  
a/k/a  
Daniel,"  
"Yan Hua Wei,"  
"Haizhe Pei,"  
"Minghao Li," and  
"Dongyun Zhou,"

during and in relation to violations of federal law, namely, credit card fraud (18 U.S.C. § 1029), mail fraud (18 U.S.C. § 1341), wire fraud (18 U.S.C. § 1343), and fraud relating to social security cards and numbers (42 U.S.C. § 408), knowingly transferred, possessed, and used, without lawful authority, the means of identification of another person, namely, Minghao Li, as described below in Attachment B, in violation of Title 18, United States Code, Section 1028A and Section 2.

**Count Five (Aggravated Identity Theft)**

From in or about August 2009 through in or about October 2009, in Bergen County, in the District of New Jersey and elsewhere, defendant

Dong-Won Kim,  
a/k/a  
Andy Kim,"  
"Guangying Zhang,"  
"Huaying Lu," and  
"Wei Yun Zhong"

during and in relation to violations of federal law, namely, credit card fraud (18 U.S.C. § 1029), mail fraud (18 U.S.C. § 1341), wire fraud (18 U.S.C. § 1343), and fraud relating to social security cards and numbers (42 U.S.C. § 408), knowingly transferred, possessed, and used, without lawful authority, the means of identification of another person, namely, Guangying Zhang, as described below in Attachment B, in violation of Title 18, United States Code, Section 1028A and Section 2.



**Count Six (Conspiracy to Commit Wire Fraud)**

From in or about October 2009 through in or about December 2009, in Bergen County, in the District of New Jersey and elsewhere, defendants

Sang-Hyun Park,  
a/k/a  
"Jimmy,"  
"Jianfang Jiang," and  
"Zhen Li,"

Hyun-Jin LNU,  
a/k/a  
"Hai Hua Xu,"

Min-Soo Son,  
a/k/a "Chris," and

Sang-Kyu Seo

knowingly and willfully conspired and agreed with each other and others to devise a scheme and artifice to defraud the credit card companies referred to in Paragraph 72 below of Attachment B, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and to do so by means of interstate wire communications, as described in Paragraph 72 below of Attachment B, contrary to Title 18, United States Code, Section 1343, in violation of Title 18, United States Code, Section 1349.

**Count Seven (Conspiracy to Commit Wire Fraud)**

In or about January 2010, in Bergen County, in the District of New Jersey and elsewhere, defendants

Sang-Hyun Park,  
a/k/a  
"Jimmy,"  
"Jianfang Jiang,"  
"Zhen Li,"

Hyun-Jin LNU,  
a/k/a  
"Hai Hua Xu,"

Jong-Hoon Kim,  
a/k/a  
"John,"  
"Zhengshu An,"  
"Ruiping Chen,"  
"Chun Shi Huang," and

Hag-Sang Jang

knowingly and willfully conspired and agreed with each other and others to devise a scheme and artifice to defraud the credit card companies referred to in Paragraph 89 below of Attachment B, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and to do so by means of interstate wire communications, as described in Paragraph 89 below of Attachment B, contrary to Title 18, United States Code, Section 1343, in violation of Title 18, United States Code, Section 1349.

**Count Eight (Conspiracy to Commit Wire Fraud)**

From in or about April 2010 through in or about May 2010, in Bergen County, in the District of New Jersey and elsewhere, defendants

Sang-Hyun Park,  
a/k/a  
"Jimmy,"  
"Jianfang Jiang," and  
"Zhen Li,"

Hyun-Jin LNU,  
a/k/a  
"Hai Hua Xu,"

Osung Kwon,  
a/k/a "Xiaoling Zhang,"

Yong Kim Lee, and

Hi-Joo Yang

knowingly and willfully conspired and agreed with each other and others to devise a scheme and artifice to defraud the credit card companies referred to in Paragraph 94 below of Attachment B, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and to do so by means of interstate wire communications, as described in Paragraph 94 below of Attachment B, contrary to Title 18, United States Code, Section 1343, in violation of Title 18, United States Code, Section 1349.

**Count Nine (Money Laundering)**

From on or about June 2009 through on or about July 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant Sang-Hyun Park, a/k/a "Jimmy," "Jianfang Jiang," and "Zhen Li," knowingly conducted and attempted to conduct financial transactions affecting interstate commerce and foreign, as more fully set forth in Paragraph 105 below of Attachment B, involving the proceeds of specified unlawful activity, namely, credit card fraud (18 U.S.C. § 1029), mail fraud (18 U.S.C. § 1341), wire fraud (18 U.S.C. § 1343), and bank fraud (18 U.S.C. § 1344), knowing that the financial transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity, and knowing that the property involved in the financial transactions represented proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and Section 2.

**Count Ten (Fraudulent Use of Identity Documents and Authentication Features to Defraud the United States)**

From in or about January 2010 through October 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant Sang-Hyun Park, a/k/a "Jimmy," "Jianfang Jiang," and "Zhen Li," knowingly possessed identifications documents, false identification documents, and authentication features, including social security numbers, to electrically file and transmit, cause to be electrically filed and transmitted, and to obtain fraudulent tax refunds from the United States to which he was not entitled, as described in Paragraphs 110 through 113 below of Attachment B, to defraud the United States, namely, the Internal Revenue Service, in violation of Title 18, United States Code, Section 1028(a)(4) and Section 2.

## 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**

At all times relevant to this Criminal Complaint:

1. Defendant Sang-Hyun Park, a/k/a "Jimmy," "Jianfang Jiang," and "Zhen Li," a resident of Palisades Park, New Jersey, was the leader of a criminal enterprise that operated in northern New Jersey and elsewhere.

a. Defendant Sang-Hyun Park operated out of several offices at the following locations: Brinkeroff Avenue, Palisades Park, New Jersey (hereinafter the "Brinkeroff Office"), Broad Avenue, Palisades Park, New Jersey (hereinafter the "Broad Office"), Bergen Boulevard, Palisades Park, New Jersey (hereinafter the "Bergen Boulevard Office"), and Bergen Turnpike, Ridgefield Park, New Jersey (hereinafter the "Bergen Turnpike Office"). Defendant Sang-Hyun Park and his co-conspirators often moved offices to avoid detection by law enforcement. Defendant Sang-Hyun Park was also the principal or owner/operator of several fictitious shell companies, including Samsung Consulting/Top Consulting (hereinafter "Samsung Consulting"), Moja Trading Inc. (hereinafter "Moja"), Cocoxu Corporation (hereinafter "Cocoxu"), Li Nail Plus, Inc., d/b/a "Li Nails" and "Nails Plus" (hereinafter "Li Nail"), Ameth Thread Trading, Inc. (hereinafter "Ameth Thread"), and Mono Corporation (hereinafter "Mono Corp."). Defendant Sang-Hyun Park registered his company, Li Nail, in the name of Zhen Li, a fraudulently obtained

identity belonging to another person, as described below. Defendant Sang-Hyun Park established and used these companies for the sole purpose of committing fraud.

b. To further the goals and aims of the criminal enterprise, defendant Sang-Hyun Park conspired with: (i) individuals employed by or associated with him who engaged in acts in furtherance of the criminal enterprise; (ii) "customers" who paid defendant Sang-Hyun Park and his co-conspirators for identity documents and who enriched themselves by engaging in identity fraud, credit card fraud, bank fraud, and tax fraud, among other crimes; (iii) brokers, suppliers, and manufacturers of identity documents, such as social security cards, immigration documents, and genuine and counterfeit driver's licenses; (iv) individuals who fraudulently increased the credit scores associated with fraudulently obtained identities that Sang-Hyun Park's sold and provided to his "customers"; and (v) collusive merchants who charged or "swiped" fraudulently acquired credit cards for the purpose of defrauding banks and credit card companies or who "fenced" or purchased merchandise, knowing the same to have been purchased through the fraud (hereinafter collectively the "Park Criminal Enterprise").

#### **Employees and Associates of Defendant Sang-Hyun Park**

2. Defendant Hyun-Jin LNU, a/k/a "Hai Hua Xu," was a resident of Ridgefield, New Jersey and was "second in command" of the criminal enterprise. Defendant Hyun-Jin LNU, a/k/a "Hai Hua Xu," is the registered agent of Cocoxu. In addition, defendant Hyun-Jun LNU, using the Chinese name Hai Hua Xu, obtained a Certificate of Trade Name from Bergen County, New Jersey for Citi Apparel Distributor and opened two business accounts at Wachovia Bank in the name of Citi Apparel Distributor and Citi Fashion Wholesale, all of which were fictitious shell companies used to commit fraud. (See Attachment C for photographs of Hyun-Jin LNU).

3. Defendant Dong-Il Kim, a/k/a "Cai Juan Zhang" and "Zhankun Liu," was a resident of Ridgefield Park, New Jersey and an employee of defendant Sang-Hyun Park.

4. Defendant Sung-Sil Joh, a/k/a "Jenny" and "Zhanhong Fan," was a resident of Palisades Park, New Jersey. Defendant Sung-Sil Joh was the owner/operator and registered agent of Cello Hair, Inc., d/b/a Cello Hair Design, a hair salon business located in Palisades Park, New Jersey (hereinafter "Cello Hair").

5. Defendant Joong-Hyun Jung, was a resident of

Palisades Park, New Jersey and an employee of defendant Sang-Hyun Park.

6. Defendant Osung Kwon, a/k/a "Xiaoling Zhang," was a resident of Palisades Park, New Jersey and an employee of defendant Sang-Hyun Park. Osung Kwon, using the name "Xiaoling Zhang," was the registered agent of USA Apparel, Inc. (hereinafter "USA Apparel"), a fictitious shell company.

7. Defendant Jin LNU, a/k/a "Jin," "Zhaofang Chen," and "Jianxin Jiang," was a resident of Flushing, New York. (See Attachment D for photographs of defendant Jin LNU).

8. Defendant Min-Soo Son, a/k/a "Chris," was a resident of Ridgefield, New Jersey.

#### **The Document Brokers**

9. Defendant Young-Hee Ju, a/k/a "Stephanie" and "Mingji Piao," was a resident of Closter, New Jersey and the owner/operator of My Fair Lady, a nail salon located in Montvale, New Jersey, and Blooming Nails 7, a nail salon located in Chestnut Ridge, New York.

10. Defendant Hyo-Il Song, a/k/a "Daniel," "Yan Hua Wei," "Haizhe Pei," "Minghao Li," and "Dongyun Zhou," was a resident of Fort Lee, New Jersey. Defendant Hyo-Il Song was the principal of 153 Samsung DC, Inc. (hereinafter "153 Samsung DC") and 90 You & Me Corporation (hereinafter "90 You and Me").

11. Defendant Dong-Won Kim, a/k/a "Andy Kim," "Guangying Zhang," "Huaying Lu," and "Wei Yun Zhong," was a resident of Flushing, New York.

12. Defendant Seung-Ho Noh, a/k/a "Peter" "Mr. Park," "Zhong Z. Yin," "Chae Yoon Lim," and "Zhiqing Zhang," was a resident Oakland Gardens, New York.

#### **The Credit Build Up Teams**

13. Defendant Matthew J. Kang, a/k/a "Jun-Yong Kang," was a resident of Englewood Cliffs, New Jersey and the principal of Summit Advisors Group, LLP, a purported financial advisory business located in Englewood Cliffs, New Jersey.

14. Defendant Rita S. Kim, a/k/a "Rita Han," was a resident of Fort Lee, New Jersey and the owner/operator of Shin Yong Consulting, LLC, d/b/a Shin Hwa Consulting (hereinafter "Shin

Hwa"), a purported financial consulting business located in Palisades Park, New Jersey.

15. Defendant Hyon-Suk Chung, a/k/a "Clara," was a resident of North Bergen, New Jersey and the owner/operator of Shin Hwa.

16. Defendant Young-Woo Ji, a/k/a "Fei Chen," is a resident of Bayside, New York.

### **The Collusive Merchants**

17. Defendant Sang-Kyu Seo was a resident of Palisades Park, New Jersey and the principal and owner/operator of Hang Jin Yi, Inc., d/b/a Hwangini, a room salon located in North Bergen, New Jersey. At this room salon, customers, primarily men, paid money for alcohol and the company of females.

18. Defendant Hyun-Yop Sung, a/k/a "Shanji Li," was a resident of Carlstadt, New Jersey.

19. Defendant FNU LNU#1, a/k/a "Mr. Choi" and "Xijun Gu" was a resident of Little Ferry, New Jersey and the owner/operator of For Your Joy, LLC (hereinafter "For Your Joy"), a purported wholesale business located in Palisades Park, New Jersey. (See Attachment E for a photograph of defendant FNU LNU#1).

20. Defendant Hyeon-U Kim, a/k/a "Deshang Zhang" and "Xiurong Xu," was a resident of Flushing, New York and the owner/operator of Sunny Enterprise, a store front located in Flushing, New York.

21. Defendant Edward M. Ha was a resident of River Edge, New Jersey and a certified public accountant with an office located in Ridgefield, New Jersey.

22. Defendant Jong-Hoon Kim, a/k/a "John," "Zhengshu An," "Ruiping Chen," and "Chun Shi Huang," was a resident of Ridgefield, New Jersey and the owner/operator and principal of Red Coco International, Inc. (hereinafter "Red Coco Int'l"), a purported wholesale seafood and grocery supply business located in Ridgefield, New Jersey.



## The Customers

23. Defendant Chi-Won Jeon, a/k/a "Xianzi Luo" and "Fengling Jin," was a resident of Leonia, New Jersey.

24. Defendant Jung-Hyuck Seo, a/k/a "Xiaoqin Zhang," was a resident of Palisades Park, New Jersey and the registered agent of Erin's Skin Supply, Inc. (hereinafter "Erin's Skin Supply"), a purported beauty supply business located in Palisades Park, New Jersey.

25. Defendant Jong-Kwan Hong, a/k/a "Dongshu Li," was a resident of Westbury, New Jersey.

26. Defendant In-Sook Lee, a/k/a "Susan" and "Ping Fang," was a resident of Palisades Park, New Jersey and employed at defendant Sang-Hyun Park's business, Li Nail, d/b/a "Nails Plus," in Hopatcong, New Jersey.

27. Defendant Sung-Rok Joh, a/k/a "Zhang Li," was a resident of Palisades Park, New Jersey and the brother of defendant Sung-Sil Joh (see Paragraph 4 above).

28. Defendant Jung-Bong Lee, a/k/a "Hong Guo Cui" and "Wei Xiang Lu," was a resident of Palisades Park, New Jersey and the principal of Star 72 Jewelry Incorporated and Lu 72 Fashion, Inc.

29. Defendant Hye-Won Jung, a/k/a "Meihong He," was a resident of Palisades Park, New Jersey and employed at defendant Sang-Hyun Park's business, Li Nail, d/b/a "Nails Plus," in Hopatcong, New Jersey.

30. Defendant Son-Hee Chong, a/k/a "Mingshun Yuan," was a resident of Palisades Park, New Jersey.

31. Defendant In-Suk Joo, a/k/a "Danhua Wang," was a resident of Clark, New Jersey.

32. Defendant Byung Jang, a/k/a "Pyung-Hak Jang" and "Xue Hui Shi," was a resident of Fort Lee, New Jersey and the reported owner/operator of Yuri Beauty Salon.

33. Defendant Amy Yang, a/k/a "Sung-Cha Yang," "Yulan Qian" and "Amy Pitts," was a resident of Palisades Park, New Jersey and the wife of defendant Sang-Kyu Seo (see Paragraph 17 above).

34. Defendant Song-Ja Park, a/k/a "Run Hong Liu," was a resident of Ridgefield, New Jersey.

35. Defendant Min-Jun Kwon, a/k/a "Kwon Yi," was a resident of Ridgefield, New Jersey and the son of defendant Song-Ja Park.

36. Defendant Hag-Sang Jang was a resident of Palisades Park, New Jersey and the owner and operator of H and S Construction Company (hereinafter "H and S Construction"), in Palisades Park, New Jersey.

37. Defendant Jung-Sook Ko, a/k/a "Grace S. Lim" and "Haishun Jin," was a resident of Ridgefield, New Jersey.

38. Defendant Myung-Kyun Ko, a/k/a "Longnan Cui," was a resident of Leonia, New Jersey. New M&K Global, Inc., a business incorporated in New Jersey, was formed by an individual using the name Longnan Cui, a fraudulently obtained identity belonging to another person, and purportedly operated out of a residence in Ridgefield, New Jersey belonging to defendant Myung-Kyun Ko's sister, defendant Jung-Sook Ko (see Paragraph 37 above).

39. Defendant Yoon-Hee Park, a/k/a "Yun-Hee Park," "Zhangqi Zhang," and "Xiaofang Zhu," was a resident of Flushing, New York.

40. Defendant Alex S. Lee, a/k/a "Yicun Zhu" and "Yun Hu," was a resident of Palisades Park, New Jersey.

41. Defendant Yong Kim Lee, a/k/a "Yong Kim," was a resident of Linden, New Jersey.

42. Defendant Hi-Joo Yang was a resident of Forest Hills, New York.

43. Defendant Kyung-Ki Kim, a/k/a "Yuting Zhao," was a resident of Edison, New Jersey.

44. Other Parties

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

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

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

d. An individual was cooperating with law enforcement (hereinafter "Cooperating Witness Four").

e. A co-conspirator, not named as a defendant herein, was a resident of Bergen County, New Jersey (hereinafter "Co-Conspirator One").

f. An individual was a federal agent acting in an undercover capacity (hereinafter "Undercover Agent").

Interception of Wire Communications-The Wire Taps

45. 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:

a. a cellular telephone used by defendant Sang H. Park with phone number ending 4629 (hereinafter "First Park Target Facility");

b. a cellular telephone used by defendant Sang H. Park with phone number ending 2579 (hereinafter "Second Park Target Facility"); and

c. a cellular telephone used by defendant Young-Hee Ju with phone number ending 7792 (hereinafter "Ju Target Facility").

## Overview of the Criminal Enterprise

46. Defendant Sang-Hyun Park advertised in local Korean newspapers and represented that he and his co-conspirators could obtain driver's licenses, credit cards, and money for their customers, virtually all of whom were of Korean descent.

### 47. Identity Theft and Use of Identity Documents

a. The Park Criminal Enterprise fraudulently obtained, brokered, and sold social security cards, social security numbers, and other identity documents to customers for a fee of between approximately \$5,000 and \$7,000. Generally, these social security cards began with the prefix "586." These social security cards were issued by the United States to individuals, usually from China, who were employed in American territories, such as American Samoa, Guam, the Phillipines, and Saipan. As part of the fee, the Park Criminal Enterprise used these "586" social security cards and numbers (corresponding to Chinese names) to either: (a) obtain and produce genuinely issued driver's licenses, identification cards, and other identity documents from various states; or (b) manufacture counterfeit driver's licenses and other counterfeit identity documents. These genuinely issued or counterfeit documents were obtained through other brokers. The Park Criminal Enterprise obtained out-of-state driver's licenses and identification cards to exploit perceived weaknesses in those states' issuing procedures and to make it more difficult for bank employees in New Jersey to detect fraud and counterfeit documents.

### 48. The Credit Build Up

a. After brokering, obtaining, selling, and providing these identity packages (i.e., social security card or number and genuine or counterfeit driver's license) to the customers, the Park Criminal Enterprise engaged in the fraudulent build up of the credit scores associated with the 586 identities.

b. This "credit build up" was accomplished by taking the Chinese name and the corresponding 586 social security (i.e., the Chinese identity) and attaching that identity, as an authorized user, to various individual's credit card accounts. The individuals involved in "credit build up" were members of or co-conspirators with the Park Criminal Enterprise, and they received a fee for their "service," knowing that the credit build up was for the purpose of committing fraud.

c. By attaching the Chinese identity to their credit card accounts, these credit build up teams artificially increased the credit score associated with the Chinese identities to between 700 and 800. In reality, the individuals who provided this "credit build up" service for the Park Criminal Enterprise's customers neither knew the actual person in whose name the build up was being conducted (i.e., the Chinese identity) nor, in virtually every instance, the customer (i.e., the Korean individual using the identity). Furthermore, to deceive credit reporting agencies, credit card companies, banks, and lenders, the credit build up teams knowingly made false statements concerning the residency of these fraudulently obtained Chinese identities.

d. The credit scores were 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. The main purpose of building these credit scores was to profit by committing identity theft and financial fraud, as further described below.

#### 49. The Various Schemes to Defraud

a. After the customer's credit build up was completed, the Park Criminal Enterprise instructed, coached, and conspired with its customers to use the fraudulent identities with perfect or near perfect credit scores to open and obtain bank accounts, check books, credit cards (including store credit cards from merchants), debit cards, lines of credit, and loans, including loans guaranteed by the United States Small Business Administration. The Park Criminal Enterprise often dispatched its employees and associates to accompany its customers into banks and retail stores for the purpose of opening accounts, applying for credit cards, and using these fraudulently obtained credit cards to purchase merchandise.

b. Thereafter, the Park Criminal Enterprise and its co-conspirators, including its customers, enriched themselves through the following schemes:

##### "Bust Out" Schemes

###### c. "The First Round":

i. "Kkang." The Park Criminal Enterprise obtained cash from the fraudulently obtained credit cards through the practice of "kkang," a slang Korean phrase referring to the use of collusive merchants to obtain cash by charging or

"swiping" fraudulently obtained credit cards. The Park Criminal Enterprise charged or "swiped" the credit cards on credit card machines possessed by wholly fictitious shell companies or other merchants (hereinafter "Collusive Merchants"). After the money from these charges was transmitted into bank accounts corresponding to these credit card machines and/or collusive merchants, the cash was withdrawn by the Park Criminal Enterprise and its co-conspirators. For processing these credit card transactions-i.e., "kkang," the Collusive Merchants received a fee (i.e., a "kkang fee").

ii. Purchase of Merchandise. The Park Criminal Enterprise also used, and directed its customers to use, the fraudulently obtained credit cards and retail credit (i.e., store credit) to purchase at retail stores various goods, including liquor, clothes, jewelry, sunglasses, handbags, and makeup, among other things, which merchandise was sold to "fences" (i.e., individual engage in the business of buying and selling stolen or fraudulently obtained goods) or retained for personal use.

d. "Second Round Bust Out." After making these "first round" charges, the Park Criminal Enterprise then made payments, either by telephone or by check, toward the charges made during the "first round." These payments were almost always drawn against bank accounts opened with Chinese identities with corresponding 586 social security numbers, and, in virtually every instance, the payments were made with insufficient funds, resulting in the payments being returned. After the credit card companies received these payments, but before the payments were determined to be fraudulent, the credit card companies credited the accounts, thereby allowing additional charges to be made on these fraudulently obtained credit cards. Thereafter, the Park Criminal Enterprise and its co-conspirators made additional charges on these credit cards, in much the same manner as described during the "first round." The Park Criminal Enterprise referred to this part of the fraud as the "second round." Ultimately, the charges from the first round and second round were not paid, resulting in significant losses to the victim credit card companies.

e. "Personal Bust Out." At times and for a fee, the Park Criminal Enterprise "busted out" credit cards and lines of credit belonging to customers in their own name.

### **Bank, Loan, and Tax Fraud**

f. Check-Kiting/"Check Jobs." The Park Criminal Enterprise defrauded banks by engaging in check-kiting. Members of the Park Criminal Enterprise deposited checks with insufficient funds into bank accounts opened with Chinese identities and corresponding 586 social security numbers. After depositing these checks, they withdrew and attempted to withdraw money from these accounts before the banks discovered the fraud.

g. Cars. The Park Criminal Enterprise and its co-conspirators used the fraudulently obtained Chinese identities and corresponding 586 social security numbers to obtain loans and leases for high-end cars. After obtaining these cars, they used these cars for their personal use and enjoyment and/or sold and attempted to sell these cars.

h. Tax Fraud. The Park Criminal Enterprise used the fraudulently obtained Chinese identities and corresponding 586 social security numbers to defraud the United States by, among other ways, electronically filing false and fictitious tax returns with the Internal Revenue Service and claiming and receiving tax refunds based on these false and fictitious returns.

## **The Investigation of the Park Criminal Enterprise**

### **The Brokers: Trafficking in Social Security Cards**

50. In furtherance of the scheme, the Park Criminal Enterprise obtained, brokered, and sold to its customers genuine social security cards or numbers issued to actual persons. For example:

a. On or about September 17, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Dong-Won Kim. During this intercepted conversation, defendant Dong-Won Kim asked if any person wanted to "do a New York license." Defendant Sang-Hyun Park asked, "Under what kind of conditions," and defendant Dong-Won Kim replied, "No, without any conditions. For example, any kid who has 586 [social security number], or someone who had an old New York license but died, or 'I have nothing, but want to get a license. . . .'" Defendant Sang-Hyun Park asked, "It's

possible with people who had old license and died?" Defendant Dong-Won Kim replied, "Yes, it's possible." Defendant Sang-Hyun Park then stated, "I see. Let's meet in person to talk about that."

b. On or about September 17, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Young-Hee Ju. During this call, defendant Sang-Hyun Park asked, "How is your business these days?," and defendant Young-Hee Ju replied, "We have the nail shop and are busy doing visas and driver's licenses." Later during the conversation, defendant Young-Hee Ju asked, "[W]hat are you doing these days?," and defendant Sang-Hyun Park replied, "I do everything, this and that, driver's licenses . . . ."

c. On or about September 24, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from a yet to be identified Korean-speaking male and prospective customer ("Customer"). The following discussion ensued, in substance and in part:

Park: Yes, yes. Do you know [Dong-Il Kim]?  
Customer: Yes, I'm calling with big brother [defendant Dong-Il Kim's] introduction.  
Park: Yes, yes. Okay. I called you after I got a call.  
Customer: Yes, yes. I called with [defendant Dong-Il Kim's] reference because I wanted to ask you something.  
Park: Yes, yes. But you want to buy a social and do a build-up?  
Customer: Yes, I wanted to do something as big brother [defendant Dong-Il Kim] did.  
Park: Ah, okay. . . . you are making it, this, because of money, right?  
Customer: Right, I'm making it to make money.  
Park: Okay. Then do a social first, make an ID and do a build-up and do those.  
Customer: Then, how long does it take?  
Park: About three months.

\* \* \* \*

Park: Yes. It costs \$7,000 each every time you do it.  
Customer: **Well, if it works each time it comes, it'll be worth investing, as I see it.** (emphasis added).



\* \* \* \*

Park: First of all, if you want to do it, [you] have to make a social and then take a picture and give it to us, we make you either an ID or a passport.

Customer: Yes.

Park: And then, start a build-up and when . . . finished, later, apply for a card and a loan as you open an account at the bank.

Customer: Ah, really? . . . [H]ow much do I need to give you in the beginning?

Park: I get it all at once because all the fees go to . . . [do the] build up.

Customer: Ah, I have to give you all \$7,000 at once?

Park: Yes, and later we help you and the commission we get is 8% of the money coming out.

Customer: Ah, there's another 8% on the money coming out.

Park: Yes, yes.

Customer: Ah, really?

Park: And we don't take any of the fees in the beginning up to a build up because we buy a social and make an ID as well as a build up, we request it [through] build up business people.

Customer: Yes, yes.

Park: So, the money we get later is a fee since [we do] the work.

Customer: Ah, yes. The fee, do I give you or do you take it out of [the money] coming out?

Park: What? No, I get it out of the money coming out.

Customer: Right? Yes, yes.

Park: You have to give it to me [Laughs].

d. On or about September 30, 2009, at approximately 2:37 p.m., over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Matthew J. Kang. During this intercepted conversation, they discussed meeting later that day. Defendant Sang-Hyun Park stated, "All the social number [sic], I brought all the social card [sic]." Defendant Matthew J. Kang replied, "Yes, yes, yes. Okay." They agreed to meet at 4:30 p.m. that day.

e. On or about September 30, 2009, at approximately 4:46 p.m., a law enforcement officer was conducting surveillance near the Bergen Boulevard Office. During this surveillance, the

law enforcement officer observed and video recorded defendant Matthew J. Kang exit his black, BMW SUV with a brief case and enter the building in which the Bergen Boulevard Office is located.

f. On or about September 30, 2009, at 5:25 p.m., over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Matthew J. Kang. During this intercepted conversation, defendant Matthew J. Kang asked, "So, for checking accounts, I can open Bank of America and Citi, right?" Sang-Hyun Park responded, "No, and if all of their [social security numbers] start with 5 [586], and TD, PNC are okay. Open about six or seven accounts."

g. On or about October 16, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Dong-Won Kim. During the conversation, defendant Dong-Won Kim asked, "You need a card, don't you. . . . social?" Defendant Sang-Hyun Park replied that he needed three, and defendant Dong-Won Kim responded that "they came in today." Defendant Dong-Won Kim stated that he purchased the social security cards for \$800 each "so you can give me \$800 or \$900. . . ." Defendant Dong-Won Kim stated he would send the social security cards to Los Angeles if defendant Sang-Hyun Park could not confirm his need for them. Defendant Sang-Hyun Park stated, "I will give you a call right after I confirm."

h. On or about October 16, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Matthew J. Kang. During the conversation, defendant Sang-Hyun Park said, "Mr. Matthew . . . [the person said] the social [security cards] came. . . . That's why I called to confirm to do it accurately." Defendant Matthew J. Kang asked, "So, three, three of them came then?" Sang-Hyun Park confirmed that three social security cards had arrived. Defendant Sang-Hyun Park stated, "I have to pay for the social[s] first. . . ." Defendant Matthew J. Kang replied, "Well, I got Stephanie's [defendant Young-Hee Ju] thing and brought it with me." Defendant Matthew J. Kang stated, "I have the money now," and defendant Sang-Hyun Park responded, "You don't have to give it [the money] to me today. You can give it tomorrow . . . or Monday."

i. On or about October 16, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Dong-Won Kim. During the conversation, Sang-Hyun Park ordered three social security cards from defendant Dong-Won Kim. Defendant Sang-Hyun Park stated, "Yes, three has

been [sic] confirmed. [Born 19]70s, males . . . . Doesn't matter if [born in] 75, 76, 72. . . ."

j. On or about October 19, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Matthew J. Kang. During this intercepted conversation, defendant Matthew J. Kang stated, "One person . . . two people will start immediately and I was supposed to receive it today but I haven't received it yet." Defendant Sang-Hyun Park asked, "Social?" Defendant Matthew J. Kang stated, "I received it along with ID."

k. On or about December 19, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Dong-Won Kim. During this intercepted conversation, defendant Dong-Won Kim asked, "[Y]ou know the guy . . . who goes to Chicago from Flushing [New York], right? . . . . [Y]ou know [the individual] who did the social and license for ID jobs in the past. A Korean-American. . . . Yeah. He got caught. . . . the FBI came and arrested him." Defendant Dong-Won Kim stated that this individual was the main supplier of social security cards. Defendant Sang-Hyun Park sighed and replied, "I guess it'll be hard to get the social [sic] from now on." Defendant Dong-Won Kim then asked, "From whom do you get the California ones [driver's licenses]? I used to get California ones from these guys, you know, making license and ID." Defendant Sang-Hyun Park replied, "I ask Daniel for that now" [defendant Hyo-Il Song]. Defendant Sang-Hyun Park further advised, "So Daniel, as a middleman, does it for me for \$500 plus some express charge. . . . Since he's close by, I ask him to make it when he does his." In addition, defendant Sang-Hyun Park stated, "I used to do it with [a] passport and Nevada ID. . . . [b]ut I think you'd better make passport these days because one of my clients in Flushing had problem opening Citibank using Nevada ID." [As described below, defendant Sang-Hyun Park and his co-conspirators obtain and sell counterfeit Nevada driver's licenses]. Later during the conversation, defendant Sang-Hyun Park stated the following:

[W]e went to the bank with the California ID [provided by defendant Hyo-Il Song] to test it. We had no problem. . . . No problem at all. . . . Ones from Nevada [driver's licenses] there is no problem with ones from Nevada too, but the price is expensive [meaning counterfeit Nevada driver's licenses could be used to open bank accounts but were expensive to obtain from the counterfeiter]. Yeah, and Mr. Noh [defendant Seung-Ho Noh] is not known exactly for keeping

promises. You're told it'll be a week . . . .  
[g]ranted he's not the one who does it, but [Mr. Noh]  
takes too much time and makes us worried. . . . [A]nd  
he doesn't do a clean job.

l. On or about December 23, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Dong-Won Kim. During this intercepted conversation, defendant Sang-Hyun Park asked, "That Saipan, from where the driver's license was issued? Was it from Saipan?" Defendant Dong-Won Kim replied, "Yes, yes, yes. No Chicago." "Oh, from Illinois. . . . I guess it's not a good idea to carry around Illinois driver's license[s] these days, huh?" defendant Sang-Hyun Park asked. Defendant Dong-Won Kim replied, "No good, no good at all." Defendant Sang-Hyun Park noted, "whether it's real or fake," and defendant Dong-Won Kim replied, "right, right. . . . [n]o good. But that person got the original [social security card] by working in Saipan, in order to be able to apply for the social, the permanent residency here." Later in the conversation, defendant Dong-Won Kim remarked that he was "going back and forth to Chicago." [see Paragraph 67 below wherein defendant Dong-Won Kim, using 586 social security numbers, obtained approximately four driver's licenses/identification documents from Illinois].

m. On or about April 26, 2010, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Dong-Won Kim. During this intercepted conversation, defendant Sang-Hyun Park asked defendant Dong-Won Kim for two social security cards for customers born in the 1960s. Defendant Dong-Won Kim replied, "Yes, I will ask [him]." Defendant Dong-Won Kim then asked, "[C]an you do Citi. . . . bust [it]?" Defendant Sang-Hyun Park replied that such credit cards were the most difficult to defraud. Defendant Dong-Won Kim asked, "[H]ow about Chase, how do you do it after busting it?," and defendant Sang-Hyun Park replied, "Purchase items and then sell them."

n. On or about April 29, 2010, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Dong-Won Kim. During this intercepted conversation, defendant Dong-Won Kim stated that he purchased a social security card for \$1,000 corresponding to a birth year of 1968. Defendant Sang-Hyun Park instructed defendant Dong-Won Kim to bring the social security card to defendant Sang-Hyun Park, adding that he would pass on the cost of the social security card to the customer.

**Fraudulently Obtained Driver's Licenses and Identity Cards**

51. On or about the dates set forth below, in furtherance of its criminal aims and goals, the Park Criminal Enterprise, using fraudulently obtained 586 social security cards and other false documents, obtained and produced the following genuinely issued but fraudulently obtained identity documents from the Illinois Department of Motor Vehicles ("IDMV"), the Pennsylvania Department of Transportation (hereinafter "PennDOT"), the Tennessee Department of Motor Vehicles (hereinafter "TDMV"), and the California Department of Motor Vehicles ("CDMV"), as follows:

Approximate Date	Defendant	Chinese Name/SSN	Type	Issuing Authority
June 22, 2006	Seung-Ho Noh	Zhong Z. Yin 586	driver's license (with photograph)	IDMV
September 7, 2006	Hyeon-U Kim	Deshang Zhang 586	identification card (with photograph)	IDMV
March 22, 2007	Young-Hee Ju	Mingji Piao 586	driver's license (with photograph)	IDMV
May 21, 2007	Yoon-Hee Park	Zhangqi Zhang 586	identification card (with photograph)	IDMV
June 26, 2007	Hyun-Yop Sung	Shanji Li 586	driver's license (with photograph)	IDMV
July 10, 2007	Hyo-Il Song	Yan Hua Wei 586	driver's license (with photograph)	IDMV
September 25, 2007	Chi-Won Jeon	Xianzi Luo 586	driver's license (with photograph)	IDMV
February 8, 2008	Seung-Ho Noh	Chae Yoon Lim 586	driver's license (with photograph)	IDMV

Approximate Date	Defendant	Chinese Name/SSN	Type	Issuing Authority
February 25, 2008	Sang H. Park	Jianfang Jiang 586	identification card (with photograph)	IDMV
February 25, 2008	Dong-Il Kim	Zhankun Liu 586	driver's license (with photograph)	IDMV
February 25, 2008	Young-Woo Ji	Fei Chen 586	driver's license (with photograph)	IDMV
February 25, 2008	In-Sook Lee	Ping Fang 586	identification card (with photograph)	IDMV
April 9, 2008	Hyeon-U Kim	Xiurong Xu 586	driver's license (with photograph)	PennDOT
April 21, 2008	Myung-Kyun Ko	Longnan Cui 586	identification card (with photograph)	IDMV
April 24, 2008	Seung-Ho Noh	Zhiqing Zhang	identification card (with photograph)	IDMV
April 28, 2008	Jong-Hoon Kim	Zhengshu An 586	identification card (with photograph)	IDMV
April 28, 2008	Jong-Hoon Kim	Ruiping Chen 586	identification card (with photograph)	IDMV
May 12, 2008	Sang-Hyun Park	Zhen Li 586	identification card (with photograph)	IDMV
June 9, 2008	Dong-Won Kim	Guangying Zhang 586	identification card (with photograph)	IDMV

Approximate Date	Defendant	Chinese Name/SSN	Type	Issuing Authority
June 17, 2008	Hyo-Il Song	Haizhe Pei 586	identification card (with photograph)	IDMV
June 19, 2008	Dong-Won Kim	Guangying Zhang 586	driver's license (with photograph)	IDMV
June 30, 2008	Dong-Won Kim	Huaying Lu 586	driver's license (with photograph)	IDMV
July 21, 2008	Jin LNU	Zhaofang Chen 586	identification card (with photograph)	IDMV
July 21, 2008	Jin LNU	Jianxin Jiang 586	identification card (with photograph)	IDMV
July 22, 2008	Jin LNU	Zhaofang Chen 586	driver's license (with photograph)	IDMV
September 4, 2008	Alex S. Lee	Yun Hu 586	driver's license (with photograph)	PennDot
September 19, 2008	Chi-Won Jeon	Fengling Jin 586	driver's license (with photograph)	PennDOT
October 7, 2008	Jong-Hoon Kim	Zhengshu An 586	driver's license (with photograph)	IDMV
October 20, 2008	Yoon-Hee Park	Xiaofang Zhu	identification card (with photograph)	IDMV

Approximate Date	Defendant	Chinese Name/SSN	Type	Issuing Authority
October 27, 2008	Sung-Sil Joh	Zhanhong Fan 586	identification card (with photograph)	IDMV
October 27, 2008	Sung-Rok Joh	Li Zhang 586	identification card (with photograph)	IDMV
October 27, 2008	Jung-Hyuck Seo	Xiaoqin Zhang 586	identification card (with photograph)	IDMV
November 11, 2008	Jong-Hoon Kim	Chun Shi Huang 586	identification card (with photograph)	IDMV
November 17, 2008	Jung-Bong Lee	Hong Guo Cui 586	identification card (with photograph)	IDMV
November 17, 2008	Jung-Bong Lee	Hong Guo Cui 586	driver's license (with photograph)	IDMV
December 30, 2008	Hyo-Il Song	Minghao Li 586	driver's license (with photograph)	TDMV
January 12, 2009	Hyun-Jin LNU LNU	Hai Hua Xu 586	identification card (with photograph)	IDMV
January 12, 2009	Dong-Won Kim	Wei Yun Zhong 586	driver's license (with photograph)	IDMV
January 12, 2009	FNU LNU#1	Xijun Gu 598	driver's license (with photograph)	IDMV



Approximate Date	Defendant	Chinese Name/SSN	Type	Issuing Authority
January 20, 2009	Jung-Sook Ko, a/k/a "Grace Lim"	Haishun Jin 586	identification card (with photograph)	IDMV
January 20, 2009	Jung-Sook Ko, a/k/a "Grace Lim"	Haishun Jin 586	driver's license (with photograph)	IDMV
January 20, 2009	Jung-Bong Lee	Wei Xiang Lu 586	driver's license (with photograph)	PennDOT
March 6, 2009	Hyo-Il Song	Dongyun Zhou 586	driver's license (with photograph)	PennDOT
January 26, 2010	Dong-Il Kim	Cai Juan Zhang 586	driver's license (with photograph)	CDMV

a. Each social security number referred to above was not issued by the United States to the referenced defendant.

b. According to Cooperating Witness Four, he/she drove defendant Hyo-Il Song to Tennessee so defendant Hyo-Il Song could obtain a Tennessee driver's license using a Chinese alias.

## Trafficking and Use of Counterfeit Identity Documents

52. As described below, the Park Criminal Enterprise obtains and sells counterfeit driver's licenses, including counterfeit driver's license purporting to be issued by Nevada, California, New York, and other states.

a. Defendant Sang-Hyun Park stated, over the First Park Facility, that defendant Seung-Ho Noh provides counterfeit Nevada driver's licenses (see Paragraph 50k above).

b. On or about September 30, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Seung-Ho Noh. During this intercepted conversation, defendant Sang-Hyun Park stated, "A customer came and I thought ID came [for this customer] but it hasn't. When did you say it's coming this week? Which day?" Defendant Seung-Ho Noh replied, "It will come this weekend or next Monday, I think. . . . It's because it takes two weeks, and I took it last Saturday."

c. On or about September 30, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Seung-Ho Noh. During this intercepted conversation, defendant Sang-Hyun Park stated, "And another problem is that the name on one of the three IDs you gave me last time was wrong. . . . so I told [the customer] to bring the picture again, and I make a copy of the thing I gave you, president, and made copies of the things I gave these people . . . it's the same but the name is different . . . . got the date of birth, social all the same but got the name wrong." Defendant Seung-Ho Noh replied "Ah," and defendant Sang-Hyun Park stated, "Yes, so when you come, you can re-do just that." Based on this conversation and other information set forth in this Criminal Complaint, Your Affiant believes that defendant Seung-Ho Noh produces, transfers, and provides defendant Sang-Hyun Park with identity documents, including counterfeit driver's licenses, among other things, which fraudulently obtained and counterfeit documents the Park Criminal Enterprise and its co-conspirators use for the purpose of committing fraud.

d. On or about November 4, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Seung-Ho Noh. During this intercepted conversation, defendant Sang-Hyun Park stated, "There's another person who needs an ID . . . . [but] if it keeps getting delayed, it's too difficult for a middleman like me." Defendant Seung-Ho Noh asked, "How many people?," and defendant Sang-Hyun Park

replied, "There are two people getting ready right now . . . . [b]ut I think there will be more in the future." When defendant Sang-Hyun Park asked why it took so long to obtain the identifications, defendant Seung-Ho Noh replied, "They say it's because it's connected to a plane somehow but . . . . I heard it takes long because [they] cross over like that and it's made over there and brought back."

e. On or about November 10, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Seung-Ho Noh. During this intercepted conversation, defendant Seung-Ho Noh stated that he was en route to defendant Sang-Hyun Park's office and would arrive in approximately twenty minutes. Defendant Sang-Hyun Park instructed defendant Seung-Ho Noh to hurry because defendant Sang-Hyun Park had a "client waiting for ID."

f. On or about November 12, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Seung-Ho Noh. During this intercepted conversation, defendant Seung-Ho Noh asked, "Do you have any IDs to do or not?" Defendant Sang-Hyun Park replied, "[I] do but I couldn't give it to you because people [sic] didn't bring me the money." When defendant Seung-Ho Noh asked how many identifications were needed, defendant Sang-Hyun Park replied, "Two. I have to do two."

g. On or about April 21, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Matthew J. Kang. During this intercepted conversation, the following discussion ensued, in substance and in part:

Park: In my opinion, we have so many problems here . . . we are having such a hard time because we are doing it with the out of state IDs. . . That's why the department stores and banks are requesting supplemental documents. I don't think there will be as many problems as what we now have if we do it with locally issued IDs, New York or New Jersey. At least they won't tell us to send them something to verify the address. . . . Because we are doing it with IDs issued in Las Vegas, Illinois, or California the banks seem to be concerned about the authenticity of the IDs.

Kang: Right, right, the fakes.

h. On or about May 5, 2010, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Hyun-Yop Sung. During this intercepted conversation, defendant Hyun-Yop Sung stated that he met "Daniel" [defendant Hyo-Il Song], and they [defendants Hyun-Yop Sung and Hyo-Il Song] discussed the quality of counterfeit California and New Jersey driver's licenses. Defendant Hyun-Yop Sung stated: "The quality and everything else on the inside were exactly same but . . . the one made in California . . . . It was made much better than that. . . . They made the picture exactly same and good but the color tone for this has a little bit of a fake look. The tone of the color of the one I made is a little darker, darker than the actual New Jersey license. So, I will get the picture from President Daniel [defendant Hyo-Il Song] . . . . And tell him to give me time, then I will make better one even though it takes time, about three weeks. I am going to get the picture and make another one again that has a good color tone, though I am not sure I will make [a] New York one and [a] New Jersey one." Later during the conversation, defendant Hyun-Yop Sung told defendant Sang-Hyun Park, "And, about the credit card and check job [check-kiting] . . . . I am expecting to get them around Friday this week . . . . It is one for more than \$50,000, so when I get them this week, I will put them together and give them to you this Saturday or Sunday."

**Use of Fraudulently Obtained Identities to Commit Fraud—Customers of the Park Criminal Enterprise**

**53. Cooperating Witness One—First Chinese Identity**

a. On or about January 20, 2009, Cooperating Witness One placed a consensually recorded telephone call to defendant Sang-Hyun Park. Cooperating Witness One obtained defendant Sang-Hyun Park's phone number from an advertisement in a Korean newspaper. During this conversation, Cooperating Witness One asked defendant Sang-Hyun Park about obtaining a driver's license, and defendant Sang-Hyun Park responded that "we get like ten customers per day." Defendant Sang-Hyun Park stated that in exchange for \$3,500, he would arrange a trip for Cooperating Witness One to acquire a driver's license. Defendant Sang-Hyun Park stated that the money was needed to "buy the social [security card] here." During this conversation, defendant Sang-Hyun Park stated that Cooperating Witness One would travel to Chicago, Illinois with a "team."

b. On or about January 21, 2009, a law enforcement officer observed and photographed defendants Sang-Hyun Park, Hyo-Il Song, and FNU LNU#1, a/k/a "Mr. Choi" and "Xijun Gu," walking into the Brinkerhoff Office.

c. On or about January 26, 2009, Cooperating Witness One met Sang-Hyun Park at the Brinkerhoff Office. During this consensually recorded meeting (audio and video), Cooperating Witness One handed \$3,500 in cash to defendant Sang-Hyun Park, who handed the cash to defendant Hyun-Jin LNU to count. Later during the meeting, defendant Sang-Hyun Park explained that Cooperating Witness One would travel to Chicago with a "team" and would thereafter return to New Jersey with a driver's license and photo identification. During this meeting, defendant Hyun-Jin LNU acknowledged that she had also traveled to Chicago, Illinois to obtain a driver's license (see Paragraph 51 above and Paragraph 58 below). Cooperating Witness One then advised defendant Sang-Hyun Park that he/she wanted the driver's license to make money. Defendant Sang-Hyun Park replied that it would take approximately two months to build the credit score before Cooperating Witness One could use the driver's license to obtain credit cards. In addition, defendant Sang-Hyun Park stated that he would charge Cooperating Witness One approximately \$2,500 up front to build up the credit score related to the identity and the remainder of the fee would be paid after the credit build up was completed. During this meeting, defendant Hyo-Il Song was present and inside the office.

d. On or about February 1, 2009, law enforcement officers in New Jersey observed Cooperating Witness One meet defendant Sang-Hyun Park outside the Brinkerhoff Office. Cooperating Witness One then departed in a car with an unknown co-conspirator. Thereafter, the next day, in Illinois, law enforcement officers observed Cooperating Witness One meet with various, unknown co-conspirators. Thereafter, Cooperating Witness One was observed entering an IDMV facility. According to Cooperating Witness One, when he/she arrived in Illinois, an unknown individual gave him/her a social security card beginning with the prefix 586 in another person's name with the initials "Y.L.", a corresponding Chinese passport in the same name, and a letter falsely representing that Y.L. was a resident of Illinois. Cooperating Witness One, an individual of Korean descent, then used these documents in the name of Y.L., a Chinese name, to procure an Illinois driver's license and an Illinois picture identity card in the name Y.L. (hereinafter collectively the "Y.L. Identity"). After traveling back to New Jersey, Cooperating Witness One gave the 586 social security card in the name of Y.L. and the corresponding driver's license and picture

identity card to federal agents. The Chinese passport, according to Cooperating Witness One, was retained by an unknown co-conspirator.

e. Your Affiant and other agents have reviewed the social security card that Cooperating Witness One obtained in Illinois, the purchase of which social security card was brokered by defendants Sang-Hyun Park and Hyun-Jin LNU. This social security card begins with the prefix 586.

f. On or about February 23, 2009, at the Broad Office, during a consensually recorded meeting (audio and video), Cooperating Witness One paid defendant Sang-Hyun Park \$2,500 as a partial payment for the build up of the credit score related to the Y.L. Identity. During this meeting, Cooperating Witness One agreed to pay \$1,500 to defendant Sang-Hyun Park, the remaining balance for the credit build up, in about one and a half months.

g. After Cooperating Witness One obtained the Y.L. Identity documents through defendant Sang-Hyun Park and his co-conspirators, defendant Sang-Hyun Park directed Cooperating Witness One to open a Citibank checking account and obtain a cellular phone using the Y.L. Identity. On or about February 25, 2009, Cooperating Witness One telephonically called defendant Sang-Hyun Park. During this consensually recorded call, defendant Sang-Hyun Park asked if Cooperating Witness One had opened the Citibank account and obtained the phone. During this call, defendant Sang-Hyun Park told Cooperating Witness One to not apply for a credit card at Citibank because the Y.L. Identity had no credit. Defendant Sang-Hyun Park stated that Cooperating Witness One would obtain a credit card "after build up . . . . [and we] want to get a loan from [the bank] later on." Defendant Sang-Hyun Park stated that it would take approximately two months to complete the build up of the credit score associated with the Y.L. Identity. Later during the conversation, Cooperating Witness One stated that he wanted to "get the most money out," and defendant Sang-Hyun Park replied, "If we get the maximum amount out, that's good for me too, for the both of us. So let's do that."

h. On or about April 27, 2009, at the Bergen Boulevard Office, Cooperating Witness One met defendants Sang-Hyun Park and Hyun-Jin LNU. During this consensually recorded meeting (audio and video), defendant Sang-Hyun Park told Cooperating Witness One that the credit build related to the Y.L. Identity had been completed with a near perfect credit score. Thereafter, defendant Sang-Hyun Park explained how the build up of credit scores worked. Defendant Sang-Hyun Park explained that

the individuals who do "build up" attach or "plant" his customer's identity to other individuals' credit, as an authorized user, thereby making the customer's credit score the same as the primary account holder. As part of this process, defendant Sang-Hyun Park explained that the customer would then assume the address of the primary account holder [thereby establishing an address history for the customers, lending validity to the individual's bogus identity]. Later during the meeting, Cooperating Witness One paid defendant Sang-Hyun Park approximately \$1,500 in cash for the completion of the build of credit related to the Y.L. Identity.

i. Cooperating Witness Three, who was arrested and is being prosecuted in another district, was interviewed by law enforcement officers and admitted that he/she increased the credit score of the Y.L. Identity by attaching the Y.L. Identity, as an authorized user, to his/her Citibank and Bank of America credit cards. Furthermore, Cooperating Witness Three stated that he/she received a list of approximately ten to fifteen names, which included the Y.L. Identity, from defendant Hyun-Yop Sung, and Cooperating Witness Three added each name to his/her credit cards as authorized users. Cooperating Witness Three further stated that he/she was doing "credit build up" on the side to make extra money. According to Cooperating Witness Three, he/she neither knew nor met any of the individuals on the list and that he/she knew that it was illegal and was fraud for individuals of Korean ancestry to use identity documents belonging to individuals of Chinese descent.

j. According to records from a credit reporting agency, the Y.L. Identity (i.e., social security number and name) was attached to the Citibank and Bank of America credit card accounts of Cooperating Witness Three. By attaching the Y.L. Identity to his/her credit cards as an authorized user, Cooperating Witness Three caused the credit score related to the Y.L. Identity to be increased.

k. On or about May 5, 2009, at the Broad Office, Cooperating Witness One met defendant Sang-Hyun Park. During this consensually recorded meeting (audio and video), defendant Sang-Hyun Park directed Cooperating Witness One to go to Citibank to apply for a line of credit; PNC Bank to open a checking account and apply for a credit card, Chase Bank to apply for a credit card; and TD Bank to apply for a credit card. Thereafter, defendant Sang-Hyun Park explained to Cooperating Witness One how the scheme operated. Defendant Sang-Hyun Park stated that cash could be withdrawn from lines of credit and that money could be obtained from credit cards through the practice of "kkang" [a

Korean slang describing the use of collusive merchants to "bust out" credit cards, for a fee, to obtain cash].

l. On or about May 29, 2009, Cooperating Witness One entered the Broad Office. During this consensually recorded meeting (audio and video), Cooperating Witness One provided defendant Sang-Hyun Park with a PNC credit card in the name of the Y.L. Identity. Thereafter, defendant Sang-Hyun Park used this credit card to make a \$100 charge through Cocoxu, a shell company used and controlled by defendant Sang-Hyun Park. Your Affiant believes that this charge was made to test whether or not this credit card had been activated. According to Cooperating Witness One, he/she purchased neither goods nor services from or through this company. Defendant Sang-Hyun Park provided Cooperating Witness One with a Cocoxu receipt, dated May 29, 2009, in the amount of \$100, which receipt Cooperating Witness One immediately provided to law enforcement.

m. On or about June 4, 2009, at the Bergen Boulevard Office, Cooperating Witness One met defendant Sang-Hyun Park. During this consensually recorded meeting (audio and video), defendant Sang-Hyun Park explained how the "kkang" or "bust out" scheme worked. Defendant Sang-Hyun Park explained that Cooperating Witness One would charge up to the credit limit on each credit card. Defendant Sang-Hyun Park stated that Cooperating Witness One would keep the money obtained through busting out the credit cards this first time, *i.e.*, the "first round." Defendant Sang-Hyun Park further explained that defendant Sang-Hyun Park would then make some payments on the maxed out credit cards [for the purpose of keeping the account in good standing] and then attempt to take out extra money for a second time, *i.e.*, "the second round." Defendant Sang-Hyun Park further explained that the credit cards would be "busted out" by charging (or "swiping") the cards through credit card machines. Your Affiant knows that, as part of this "bust out scheme," the Park Criminal Enterprise makes charges on credit cards, usually at or near the credit limit on the credit card, and thereafter submits a payment (check or telephone payment) for those charges with insufficient funds. After the credit card company receives the payment but before the payment is determined to be fraudulent (*i.e.*, the "float" period), the credit card company credits the 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 intention of paying for any of these charges.



n. At defendant Sang-Hyun Park's direction, Cooperating Witness One used the fraudulently acquired driver's license in the name of Y.L. with a corresponding 586 social security card, to open checking accounts at TD Bank, PNC Bank, Citibank, and Chase Bank; to obtain a line of credit from Citibank; and to apply for and obtain credit cards from Macy's, Bloomingdales, Saks Fifth Avenue, Nordstrom, and Home Depot.

o. On or about June 4, 2009, defendant Sung-Sil Joh accompanied Cooperating Witness One to a TD Bank in Fairview, New Jersey for the purpose of opening a checking account using the Y.L. Identity. After entering the bank, Cooperating Witness One and defendant Sung-Sil Joh spoke with a bank employee concerning opening the account. The meeting at the bank with Cooperating Witness One, defendant Sung-Sil Joh, and the bank employee was recorded (audio and video). During the meeting and in defendant Sung-Sil Joh's presence, Cooperating Witness One provided the fraudulently obtained driver's license in the name of Y.L. to the bank employee for the purpose of applying for a credit card. When the bank employee asked Cooperating Witness One where he/she was from, he replied, consistent with his false identity, that he/she was from China. Thereafter, defendant Sung-Sil Joh, in the Korean language, told Cooperating Witness One that he/she was "answering well" and that if he was in doubt about any of the answers, that he/she should consult with her. While the bank employee was completing the on-line credit card application, defendant Sung-Sil Joh, again in the Korean language, advised Cooperating Witness One that he/she could use the credit card at the market where he worked. When Cooperating Witness One replied that he/she would be unable to use the credit card at that market because they knew his true identity, defendant Sung-Sil Joh replied that he/she could falsely state that the identity belonged to a friend. Defendant Sung-Sil Joh then advised Cooperating Witness One that he/she should not be nervous and that if he had a problem at the bank, that he/she should request a lawyer and not say "needless things" to the police or to police interpreters because the police could use the statements against him/her in court. Through this TD Bank account, approximately five bad checks, totaling approximately \$24,000 were deposited and later returned for insufficient funds, and approximately \$4,200 in cash was withdrawn in furtherance of a check-kiting scheme.

p. On or about June 4, 2009, after defendant Sung-Sil Joh and Cooperating Witness One returned from TD Bank, they went to the Bergen Boulevard Office. Thereafter, from the Bergen Boulevard Office, defendant Jung-Bong Lee drove defendant Hyun-Jin LNU, and Cooperating Witness One, and a yet to be identified

Korean female to Citibank in Totowa, New Jersey. After arriving at the bank, defendant Hyun-Jin LNU escorted the unknown female into the bank while Cooperating Witness One remained in the car with defendant Jung-Bong Lee.

q. On or about June 8, 2009, a convenience check, in the amount of \$4,500 and drawn against a PNC credit card account in the name of Y.L., was deposited into an account at Citibank in the name of Limin Sun, a Chinese name with a corresponding 586 social security number and a residential address previously used by defendant Sang-Hyun Park.

r. On or about June 15, 2009, Cooperating Witness One met defendants Sang-Hyun Park and Hyun-Jin LNU at the Bergen Boulevard Office. During this consensually recorded meeting (audio and video), defendant Sang-Hyun Park gave Cooperating Witness One approximately \$3,825 in cash and stated that the cash represented Cooperating Witness One's 85% profit from the scheme. Defendant Sang-Hyun Park referred to the remaining 15% as his commission. Defendant Sang-Hyun Park told Cooperating Witness One that to "make the big money" he/she needed to continue to make small purchases on the credit cards. Immediately after this meeting, Cooperating Witness One gave the \$3,825 in cash to federal agents.

s. On or about July 22, 2009, Cooperating Witness One met defendants Sang-Hyun Park and Hyun-Jin LNU at the Bergen Boulevard Office. Defendant Byung Jang was present in the Bergen Boulevard Office. During this consensually recorded meeting (audio and video), defendant Sang-Hyun Park told Cooperating Witness One that to make money on a Chase credit card, they had to purchase merchandise and then resell it. Therefore, defendant Sang-Hyun Park stated that Cooperating Witness One needed to make time to shop. Defendant Byung Jang added that retail stores were becoming increasingly cautious about certain charges. Later during the conversation, defendant Byung Jang stated that he intended to establish a new business once he received a lump sum from a bust out scheme. Defendants Sang-Hyun Park, Hyun-Jin LNU, and Byung Jang suggested that Cooperating Witness One go to retail stores, like Nordstrom, Best Buy, and Home Depot, to apply for credit cards. Defendant Sang-Hyun Park then gave Cooperating Witness One approximately \$4,300. In addition, defendants Sang-Hyun Park and Hyun-Jin LNU gave Cooperating Witness One handwritten documents, reflecting the accounts opened using the Y.L. Identity, the corresponding maximum credit limits for each credit card, and the breakdown of the cash due to Cooperating Witness One resulting from defendant Sang-Hyun Park's busting out of credit cards. Immediately after this meeting, Cooperating

Witness One gave the \$4,300 in cash and documents to federal agents.

t. On or about August 31, 2009, a telephone payment was made for the Y.L. Macy's Visa account in the amount of \$2,914.95. On or about September 3, 2009, this payment was returned because of insufficient funds. In addition, on or about August 31, 2009, a telephone payment was made for the Y.L. Bloomingdale's Visa account in the amount of \$2,900. On or about September 8, 2009, this payment was returned because of insufficient funds. Your Affiant believes that these facts are consistent with "busting out" credit cards, as defendant Sang-Hyun Park had explained to Cooperating Witness One.

u. At various times after Cooperating Witness One received credit cards obtained with the Y.L. Identity, he/she provided the credit cards to defendant Sang-Hyun Park. The following table sets forth some of the fraudulent charges made or caused to be made by defendant Sang-Hyun Park and his co-conspirators with the fraudulently acquired Y.L. Identity credit cards, among others:

Date	Type of Credit Card	Amount	Description
June 8, 2009	PNC Visa	\$4,500	Convenience check cashed at PNC Bank
June 22, 2009	PNC Visa	\$850	Charge through Cocoxu
June 26, 2009	Macy's Visa	\$1,790	Charge through Erins Supply.
June 26, 2009	Bloomingdales Visa	\$1,350	Charge through Cocoxu
June 29, 2009	Macy's Visa	\$300	Charge through Cocoxu
July 6, 2009	Bloomingdales Visa	\$780	Charge through Li Nails Plus.
July 31, 2009	Chase Visa	\$7,053.52	Charge through a liquor store in Palisades Park, New Jersey.
August 1, 2009	Chase Visa	\$1,500	Charge through "Hang Jin Yi" [defendant Sang-Kyu Seo's room salon]

Date	Type of Credit Card	Amount	Description
August 20, 2009	PNC Visa	\$1,000	Charge through "Hwangini" [defendant Sang-Kyu Seo's room salon]
September 2, 2009	Macy's Visa	\$2,896.81	Charge through Li Nails Plus.
September 2, 2009	Bloomingdale's Visa	\$2,815.79	Charge through Erins Supply.
September 3, 2009	Macy's Visa	\$100	Charge through New M and K Global
September 3, 2009	Bloomingdale's Visa	\$50	Charge through New M and K Global

The above charges were not made for the purchase of goods or services but rather to "bust out" (i.e., "kkang") the credit cards obtained by Cooperating Witness One, at defendant Sang-Hyun Park's direction, using the fraudulently obtained Y.L. Identity. Furthermore, according to records from each credit card company referred to in the above table, the charges were not paid, resulting in a loss to each company.

v. On or about September 5, 2009, defendants Hyun-Jin LNU and Dong-Il Kim entered a liquor store in Hackensack, New Jersey and purchased fives cases of Johnnie Walker Black and one case of Johnnie Walker Blue, costing approximately \$3,170.77. Law enforcement officers obtained and reviewed a security video from this liquor store that shows defendant Dong-Il Kim handing a credit card to the merchant and signing a receipt. Records obtained during this investigation have revealed that this purchase was made using a Chase credit card in the name of Y.L., the identity purchased by Cooperating Witness One from defendant Sang-Hyun Park and his co-conspirators, as described above. Furthermore, the receipt contains a number and date of birth corresponding to the number and date of birth on the Illinois identification card obtained by Cooperating Witness One in the name of Y.L.

w. Defendant Sang-Kyu Seo is the owner and operator of Hang Jin Yi, Inc., d/b/a Hwangini. On or about September 8, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Sang-Kyu Seo. During this intercepted conversation, defendant Sang-Hyun Park stated, "I bought the liquor." Defendant Sang-Kyu Seo replied, "How much? Okay, I got it." Defendant Sang-Hyun Park replied, "Black, one, two, three, four, about five. Five or four boxes. And one box of blue, blue." (see Paragraph 53v above, wherein defendants Hyun-Jin LNU and Dong-Il Kim used a fraudulently acquired credit card, obtained using the fictitious identity of Cooperating Witness One, to purchase fives cases of Johnnie Walker Black and one case of Johnnie Walker Blue).

x. On or about September 8, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Sang-Kyu Seo. During this intercepted conversation, defendant Sang-Kyu Seo stated, "Bring the liquor to the store later, five [boxes] of black and one box of blue." Later during the conversation, defendant Sang-Kyu Seo asked, "Is the work for my little one going well?" Defendant Sang-Hyun Park replied, "ID will arrive tomorrow or not later than the day after. . . ."

y. On or about September 8, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Sang-Kyu Seo. During this intercepted conversation, the following discussion ensued, in substance and in part:

Park: Big brother, I can't go. I'll send Dong Il [defendant Dong-Il Kim].  
Seo: Oh.  
Park: Black five box[es] and blue one box.  
Seo: Yeah, I know.  
Park: So, it's \$1,980.  
Seo: Why is it \$1,980, man?

\* \* \* \*

Park: I got \$2,500 for twelve bottles last time. . .  
. . I got \$2,160 for three boxes of Johnny Blue. You gave me \$4,660, big brother.  
Seo: Ah.  
Park: That's true. It's still 40% cheaper, according to my calculation. . . .

z. On or about September 25, 2009, Cooperating Witness One met defendants Sang-Hyun Park and Hyun-Jin LNU at the Broad Office. During this consensually recorded meeting (audio and video), defendant Sang-Hyun Park told defendant Hyun-Jin LNU to pay Cooperating Witness One approximately \$7,283. Defendant Sang-Hyun Park stated that this cash represented Cooperating Witness One's share from the bust out scheme. Thereafter, defendant Hyun-Jin LNU gave Cooperating Witness One approximately \$7,283 in cash. Immediately after the meeting, Cooperating Witness One provided the \$7,283 in cash to federal agents.

aa. On or about October 23, 2009, a federal income tax refund in the amount of \$6,987 was electronically transmitted into the Y.L. Identity's Citibank Account. This account was opened by Cooperating Witness One at defendant Sang-Hyun Park's direction, and defendants Sang-Hyun Park and Hyun-Jin LNU controlled and had access to this account because, among other ways, defendant Hyun-Jin LNU establish on-line banking for this account. The 2008 federal income tax return associated with this refund was electronically filed on or about October 14, 2009 in the name of "Shunyu Li" with a corresponding 586 social security number and with reported address in Palisades Park, New Jersey. A Form W-2 in the name of Shunyu Li was electronically submitted in support of the tax return. The Form W-2 claimed that Shunyu Li was employed by a casino in Atlantic City, New Jersey; however, according to this casino, no individual by that name with that social security number was employed by the casino. Accordingly, Your Affiant believes that both the tax return and Form W-2 in the name of Shunyu Li are fraudulent. Approximately three days after the \$6,987 return was credited into the account, a check in the amount of \$7,000, drawn on this account, was made payable in the name of "Li Zhang" a Chinese identity used by defendant Sung-Rok Joh.

54. Cooperating Witness One-Second Chinese Identity

a. On or about January 23, 2010, Cooperating Witness One met defendants Sang-Hyun Park and Hyun-Jin LNU at the Bergen Turnpike Office. During this consensually recorded meeting (audio and video), Cooperating Witness One stated that he/she wanted to make more money, and defendant Sang-Hyun Park replied, "You want to do it again?" Defendant Sang-Hyun Park stated that they could make approximately \$50,000. When Cooperating Witness One asked how much he/she would be required to pay up front, defendant Sang-Hyun Park said it would cost approximately \$7,000. Defendant Sang-Hyun Park explained that it was more difficult to carry out the scheme because it was becoming more difficult to obtain social security cards, especially 586 social security

cards. When Sang-Hyun Park asked Cooperating Witness One if he/she still had the Chinese 586 social security card [referring to the Y.L. Identity], Cooperating Witness One stated that he/she had discarded it. Sang-Hyun Park replied, "No big deal, it's finished anyway. It's very difficult to get a new one." Defendant Sang-Hyun Park explained that he could no longer send his customers to Illinois to obtain driver's licenses because the IDMV had revoked numerous driver's licenses after learning that the addresses used to obtain those licenses were false. Defendant Sang-Hyun Park then explained that they could make money using a United States identification "so we go forge the ID." Defendant Sang-Hyun Park stated that the banks would accept counterfeit driver's licenses. When the Cooperating Witness One expressed concern about getting caught, defendant Sang-Hyun Park stated, "It has very low risk. Simply put, with a picture, this is how we do it." At this point in the conversation, defendant Sang-Hyun Park showed Cooperating Witness One a sample of a previous customer's documents (which documents were captured on the video recording): a social security card [number not recognizable on the video recording], a California driver's license, and a green card. Cooperating Witness One asked for a discount (\$6,000 instead of \$7,000), but defendant Sang-Hyun Park replied that he could not give a discount because he would not make any money. Defendant Sang-Hyun Park advised Cooperating Witness One it would take approximately one week to make the identification, and the credit build up would take approximately one month. Defendant Sang-Hyun Park explained that Cooperating Witness One needed to provide two photographs, and that Cooperating Witness One would receive a California driver's license.

b. On or about April 10, 2010, Cooperating Witness One met defendants Sang-Hyun Park and Hyun-Jin LNU at the Bergen Turnpike Office. During this consensually recorded meeting (audio and video), defendant Sang-Hyun Park stated that Cooperating Witness One would receive a fake California driver's license and a social security card. Defendant Sang-Hyun Park acknowledged that the social security card was real. Defendant Sang-Hyun Park then directed defendant Hyun-Jin LNU to take Cooperating Witness One's pictures and his/her money. Thereafter, Hyun-Jin LNU took \$7,000 in cash from Cooperating Witness One and counted it.

c. On or about May 8, 2010, Cooperating Witness One met defendants Sang-Hyun Park and Hyun-Jin LNU at the Bergen Turnpike Office. During this consensually recorded meeting (audio and video), Cooperating Witness One received a counterfeit California driver's license and a 586 social security card in the

name of an individual with the initials "J.Z." (hereinafter the "J.Z. Identity"). Defendant Sang-Hyun Park advised Cooperating Witness One that the counterfeit driver's license could only be used to open bank accounts (i.e., that Cooperating Witness One should not use it to drive). Later during the meeting, defendant Hyun-Jin LNU gave Cooperating Witness One a "post it" note with a phone number and instructed Cooperating Witness One to call her if Cooperating Witness One had any questions.

d. On or about August 3, 2010, Cooperating Witness One returned a telephone call to defendant Hyun-Jin LNU that she made to Cooperating Witness One several days before. During this consensually recorded conversation, defendant Hyun-Jin LNU said that the credit build up was completed and that Cooperating Witness One needed to start going to the banks with them to open accounts.

e. On or about August 19, 2010, defendant Hyun-Jin LNU called Cooperating Witness One. During this consensually recorded phone call, defendant Hyun-Jin LNU stated that the build up of credit related to the J.Z. Identity had been completed, and that it was time to open bank accounts.

#### **55. Cooperating Witness Two**

a. On or about March 17, 2009, Cooperating Witness Two called defendant Sang-Hyun Park. During this consensually recorded telephone call, Cooperating Witness Two told Sang-Hyun Park that he/she was an illegal alien, having remained in the United States after his/her tourist visa had expired. Defendant Sang-Hyun Park stated that he would have a person specializing in obtaining driver's licenses return Cooperating Witness Two's call. Cooperating Witness Two asked if defendant Sang-Hyun Park was in charge, and he stated he was "in charge of loans."

b. On or about March 18, 2009, Cooperating Witness Two called defendant Sang-Hyun Park and again asked him about obtaining a driver's license. Defendant Sang-Hyun Park asked Cooperating Witness Two if he/she had a social security number. Cooperating Witness Two replied that he/she did not have a social security number. During a subsequent call on the same day, defendant Sang-Hyun Park stated that he would have another person contact Cooperating Witness Two to assist him/her obtain a driver's license.



c. Later that day, over the Ju Facility, defendant Young-Hee Ju called Cooperating Witness Two. During this consensually recorded conversation, defendant Young-Hee Ju stated that she had contacted Cooperating Witness Two at defendant Sang-Hyun Park's request. After Cooperating Witness Two inquired about obtaining a driver's license, defendant Young-Hee Ju stated it would cost Cooperating Witness Two approximately \$3,500 plus air fare.

d. On or about March 25, 2009, Cooperating Witness Two, under the supervision and direction of law enforcement officers, met defendant Young-Hee Ju at a location in Palisades Park, New Jersey. During this consensually recorded meeting (audio and video), defendant Young-Hee Ju stated, among other things, that it would cost Cooperating Witness Two approximately \$4,000 for a driver's license and social security card and another \$2,500 to establish and build credit using these fraudulently acquired identity documents.

e. On or about April 8, 2009, Cooperating Witness Two met defendant Young-Hee Ju at a location in Palisades Park, New Jersey. During this consensually recorded meeting (audio and video), defendant Young-Hee Ju stated that Cooperating Witness Two would be required to pay approximately \$2,000 as a deposit for a social security card. Cooperating Witness Two then handed defendant Young-Hee Ju approximately \$2,000 in cash, and defendant Young-Hee Ju gave Cooperating Witness Two a social security card beginning with the prefix 586 corresponding to a Chinese name with the initials Y.F.Z. (hereinafter the "Y.F.Z. Identity"). In addition, defendant Young-Hee Ju explained that Cooperating Witness Two needed to provide two passport photographs. Defendant Young-Hee Ju also told Cooperating Witness Two that he/she would be required to pay an additional \$2,500 to build the credit score related to the Y.F.Z. Identity, which process would take approximately two months. Defendant Young-Hee Ju then explained how the credit build up would work:

Think of it like this. You have [your] own [real] social [security]. Think of it [the Y.F.Z. Identity] like it's [your] social. With [your] social, it has been built up with time [referring to credit score], but with this, it needs to be built up quickly. So, it needs to be paired as joint account holder with others of 800 [credit] scores. Then they will set up joint accounts with three accounts and charge \$2,500, \$800 [per] account. And if [the Y.F.Z. Identity is] paired with three [accounts], then the [credit] score becomes 790. Then once you apply for credit cards, they will

pull out all [the money]. [They will] withdraw everything. . . .

\* \* \* \*

Have to raise the [credit] score. It's \$2,500, but this place [the credit build up team] is cheap and [they] definitely raise [your credit] score. . . . Then once the score is about to be released, then [you can] go get an ID and right into the bank. Understand now?

f. On or about May 14, 2009, defendant Young-Hee Ju and Cooperating Witness Two met in Palisades Park, New Jersey. During this consensually recorded meeting (audio and video) Cooperating Witness Two gave defendant Young-Hee Ju approximately \$2,500 in cash to pay for the first phase of the credit build up. During this meeting, defendant Young-Hee Ju stated that she was just a "gofer" for the credit build up process, and that the individuals who provide the credit build up service always charge "our" customers \$2,500. As described below, defendant Matthew J. Kang did the credit build up for Cooperating Witness Two's Chinese identity.

g. On or about July 21, 2009, Cooperating Witness Two met defendant Young-Hee Ju at a location in Bergen County, New Jersey. During this consensually recorded meeting (audio and video), Cooperating Witness Two gave defendant Young-Hee Ju approximately \$1,500 in cash and two passport photographs for the purchase of a Chinese passport.

h. On or about July 21, 2009, over the Ju Facility, defendant Young-Hee Ju made an outgoing telephone call to defendant Sang-Hyun Park. During this intercepted conversation, defendant Young-Hee Ju stated, "Yes. Yes. It's me." Sang-Hyun Park responded, "Oh, yes. How are you?" Young-Hee Ju then stated, "I received the photos and things from someone who wishes to get a passport." Defendant Sang-Hyun Park asked, "A Chinese passport?," and defendant Young-Hee Ju said "Yes." Sang-Hyun Park then told Young-Hee Ju to bring it to him in the evening. During a subsequent intercepted conversation later that day, they discussed an individual arrested in another district. Defendant Sang-Hyun Park stated "[t]he problem started when he [arrestee] was involved with people who make driver licenses in [another state]" but the arrest was "completely unrelated to this side here." Defendant Young-Hee Ju then remarked that "people were concerned. That's why I wanted to talk." Defendant Sang-Hyun Park responded, "People over there got caught. . . . [n]ot here. . . ." Defendant Sang-Hyun Park and defendant Young-Hee Ju then

discussed "the person who applied for the passport [referring to Cooperating Witness Two]." Defendant Sang-Hyun Park stated he needed an address to send the passport to [Cooperating Witness Two] via federal express. Defendant Young-Hee Ju stated that she received \$1,500 from "the person [Cooperating Witness Two]." Defendant Sang-Hyun Park said that \$1,000 is what he pays to "the person who does it [creates the passport]." Defendant Sang-Hyun Park told defendant Young-Hee Ju to get a photograph and asked for \$100 on top of the \$1,000 fee.

i. On or about September 17, 2009, Cooperating Witness Two met defendant Sang-Hyun Park at the Broad Office. During this consensually recorded meeting (audio and video), defendant Sang-Hyun Park gave Cooperating Witness Two a counterfeit Nevada driver's license in the name of Y.F.Z., which name corresponds to a 586 social security number issued to an individual with the name Y.F.Z.

j. On or about September 17, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Young-Hee Ju. During this intercepted conversation, Cooperating Witness Two was present in defendant Sang-Hyun Park's Broad Office. During this intercepted conversation, defendant Sang-Hyun Park stated, "I gave [Cooperating Witness Two] the ID and [he/she] made it sound like the build up is completed. So I wanted to open it and discuss it. . . . [but] [w]hen I opened it [checked the credit history], there is nothing." Defendant Young-Hee Ju replied, "I will talk to [Cooperating Witness Two]." Thereafter, defendant Sang-Hyun Park placed Cooperating Witness Two on the phone, and defendant Young-Hee Ju stated, "ID is finished. One thing is missing from the build up. Ask Mr. Park [defendant Sang-Hyun Park]. The build up is becoming difficult." Cooperating Witness Two asked, "Who is going to do mine [the build up associated with the fraudulently purchased identity]?" Defendant Young-Hee Ju replied, "There is someone who can do it here. There is someone who sells it. It's selling my credit." Cooperating Witness Two then asked, "I asked for money and making card because I need money quickly." Defendant Young-Hee Ju stated, "We'll explain that after this comes out. But the score isn't ready." Later during the conversation, defendant Young-Hee Ju informed defendant Sang-Hyun Park that the build up of credit related to the identity purchased by Cooperating Witness Two was being completed by Shin-hwa [a company owned and operated by defendants Rita S. Kim and Hyon-Suk Chung; see Paragraph 103 below], and that the build up was not successful and had to be re-done. Defendant Young-Hee Ju stated, "We only work with them [defendants Rita S. Kim and Hyon-Suk Chung]. But it didn't work.

They have work backed up. So they said to wait." Defendant Sang-Hyun Park replied that he would explain the situation to Cooperating Witness Two. Defendant Sang-Hyun Park then stated, "And let's meet. I have a loan that works." Based on this conversation (as intercepted over the First Park Facility and as consensually recorded (audio and video) by Cooperating Witness Two, Your Affiant believes that defendants Sang-Hyun Park and Young-Hee Ju agreed to provide a fraudulently obtained identification to Cooperating Witness Two but that defendant Young-Hee Ju would use a separate team [defendants Rita S. Kim and Hyon-Suk Chung] to build the credit related to this fraudulently obtained identity.

k. On or about October 22, 2009, Cooperating Witness Two met defendant Sang-Hyun Park at the Bergen Turnpike Office. During this consensually recorded meeting (audio and video), defendant Sang-Hyun Park stated that the build up of the credit score associated with the Y.F.Z. Identity was not correctly completed because the address on the credit report had not been verified and therefore the build up needed to be re-done.

l. On November 5, 2009, Cooperating Witness Two met defendant Sang-Hyun Park at the Bergen Turnpike Office. During this consensually recorded meeting (audio and video), defendant Sang-Hyun Park gave Cooperating Witness Two a fictitious PSE&G utility bill with a fictitious address, which fraudulent document was created by Hyun-Jin LNU on a computer. Thereafter, defendant Sang-Hyun Park advised Cooperating Witness Two to open a Citibank Gold Plus account, using the Y.F.Z. Identity, and to place approximately \$500 in the account. Defendant Sang-Hyun Park provided Cooperating Witness Two with the information he/she would need to open this account, including fictitious employment information and income (\$55,000). This fictitious information was provided to Cooperating Witness Two on a piece of paper that was written by Hyun-Jin LNU and then provided to law enforcement by Cooperating Witness Two.

56. The Undercover Operation

a. On or about May 7, 2010, the Undercover Agent, posing as a potential customer, met with defendants Sang-Hyun Park, Hyun-Jin LNU, and Dong-Il Kim at the Bergen Turnpike Office. During this consensually recorded meeting (audio), the Undercover Agent stated that he/she had heard that he/she could make money through defendant Sang-Hyun Park. Defendant Sang-Hyun Park then explained how the scheme worked:

What we do here is, there are those who come here legally but don't live here and go back . . . . We mostly do this with Chinese people's [sic]. . . . [Undercover Agent: "So it's not going to be a Korean name?"] Right, so if I can show you a sample [defendant Sang-Hyun Park then showed him/her numerous driver's licenses, as samples, from other customers]. . . . **This social is not fake. It's real. . . . It's real but this person isn't here. . . . That's important . . . . If we use someone else's [social] here, it becomes stealing, right?. . . . But this one, the person went back to his country. . . .** (emphasis added).

Later in the conversation, defendant Sang-Hyun Park stated that the price for a real driver's license was approximately \$3,000 and this price was not negotiable because he did not make the driver's license himself. Defendant Sang H. Park advised the Undercover Agent not to drive with the counterfeit driver's license because the counterfeit driver's license could not be given to the police. Rather, defendant Sang H. Park explained that the purpose of the counterfeit driver's license was to open bank accounts. Defendant Sang-Hyun Park recounted that in the past an average customer who invested \$7,000 to \$10,000 got back approximately \$100,000; however, currently, his customers are having trouble obtaining \$50,000 because of the economy and because the banks are unpredictable. Defendant Sang-Hyun Park further stated he uses kkang to obtain money, whereby he requests others to swipe credit cards and pays them a kkang fee.

Later during this conversation with the Undercover Agent, defendant Sang-Hyun Park directed defendant Dong-Il Kim to show his driver's licenses to the Undercover Agent. According to the Undercover Agent, defendant Dong-Il Kim opened his wallet and took out two California driver's licenses. Defendant Sang-Hyun Park told the Undercover Agent that one driver's license was real and one was fake. Defendant Sang-Hyun Park then asked the

Undercover Agent for two passport photographs (to make a counterfeit driver's license) and \$7,000 in cash.

b. Thereafter, defendant Sang-Hyun Park directed the Undercover Agent to sit down with defendant Hyun-Jin LNU. Defendant Sang-Hyun Park said to Hyun-Jin LNU: "Make a file, get [the Undercover Agent's] real name, contact number, and take \$7,000 cash." The Undercover Agent then handed defendant Hyun-Jin LNU approximately \$7,000 in cash. In exchange, defendant Hyun-Jin LNU provided the Undercover Agent with a receipt for \$7,000 that stated: "This is a confirmation that [Undercover Agent's assumed name] gave \$7,000 payment, dated 5/7/10" and signed "Jay" [defendant Hyun Jin LNU].

c. In or about July 14, 2010, the Undercover Agent met defendant Hyun-Jin LNU at a location in Bergen County, New Jersey. During this consensually recorded meeting (audio), defendant Hyun-Jin LNU showed the Undercover Agent a counterfeit New York driver's license in the name of "D.M.L.," in a Chinese name (that was later determined to correspond to a 586 social security number). Defendant Hyun-Jin LNU gave the Undercover Agent a business card to a phone company and instructed the Undercover Agent to obtain a cellular phone in the name of D.M.L. In addition, defendant Hyun-Jin LNU stated that they started the build up of credit related to this name, and she expected the build up of credit to be completed by mid-August 2010. Thereafter, defendant Hyun-Jin LNU advised the Undercover Agent that he/she would need to open bank accounts with the false identity, telling the Undercover Agent that he/she "needed to forget your [real] name." Defendant Hyun-Jin LNU stated that "these people [referring to past customers] have done it before so [defendant Hyun-Jin LNU and co-conspirators] have a sense about which places they will be able to pull money out of." Defendant Hyun-Jin LNU further advised the Undercover Agent after he/she obtained money through the scheme that defendant Hyun-Jin LNU would take back the identity documents from the Undercover Agent and destroy them. Defendant Hyun-Jin LNU then told the Undercover Agent: "Listen, you gave me \$7,000 . . . . for that, build up, social, and driver's license are all included. . . . If you get unlucky and get caught somewhere, the easiest thing to do at that time is . . . . [to] just say that a Chinese person in [] Chinatown . . . . say you went to visit Chinatown and met someone and that person gave it to you."

57. Paragraphs 58 through 113 set forth each defendant's participation with or in the Park Criminal Enterprise to use fraudulently obtained identity documents or counterfeit identity documents to commit fraud.

58. Defendant Hyun-Jin LNU

a. As described in Paragraph 51 above, defendant Hyun Jin LNU, using the Chinese name Hai Hua Xu and a corresponding 586 social security number, obtained an identification card in that name from the IDMV.

b. From in or about April 2009 through October 2009, defendant Hyun-Jin LNU, using the Chinese identity Hai Hua Xu, a corresponding 586 social security number, the fraudulently obtained Illinois identification card, and her prior actual address, applied for and received credit cards from Bank of America, Chase, Citibank, Bloomingdale's, Macy's, and Saks Fifth Avenue (HSBC). Thereafter, these fraudulently obtained credit cards were used to make some the following charges ("kkang"), among others:

Date of Charge	Credit Card	Amount	Description
April 28, 2009	Macy's	\$2,756.83	Li Nails Plus (a company controlled by defendant Sang-Hyun Park)
April 30, 2009	Bloomingdale's	\$3,250.63	Li Nails Plus (a company controlled by defendant Sang-Hyun Park)
May 12, 2009	Macy's	\$4,789	Mono Corp. (a company controlled by defendant Sang-Hyun Park)

c. The charges on the Macy's credit card were not paid, resulting in a loss of approximately \$8,000. The charges on the Bloomingdale's credit card were not paid, resulting in a loss of approximately \$5,600. The charges on the HSBC Saks Fifth Avenue credit card were not paid, resulting in a loss of approximately \$12,000.

59. Defendant Dong-Il Kim

a. As described in Paragraph 51 above, defendant Dong il Kim, using the Chinese name Zhankun Liu and a corresponding 586 social security number, fraudulently obtained a driver's license in that name from the IDMV. Defendant Dong-Il Kim, using the Chinese name Cai Juan Zhang and a corresponding 586 social security number, fraudulently obtained a driver's license in that name from the CDMV.

b. Beginning in or about November 2009, defendant Dong-Il Kim, using the Chinese name Zhankun Liu, a corresponding 586 social security number, and the fraudulently obtained Illinois driver's license that he had obtained, applied for and obtained credit cards issued by TD Bank, Bloomingdale's and Citibank in the name of Zhankun Liu. Thereafter, these fraudulently acquired credit card were used to make the following fraudulent charges ("kkang"), among others:

Date of Charge	Credit Card	Amount	Description
November 24, 2009	Citibank	\$5,000	cash advance
November 25, 2009	Citibank	\$700	Hwangini (a company owned and controlled by Sang-Kyu Seo)
December 2, 2009	Citibank	\$2,685	Erins Supply
December 5, 2009	Citibank	\$1,890	New M and K Global
December 6, 2009	Citibank	\$1,000	Hwangini (a company owned and controlled by Sang-Kyu Seo)
December 9, 2009	TD Bank	\$1,520	New M and K Global
December 10, 2009	TD Bank	\$1,310	Sunny Enterprise (a company owned and controlled by Defendant Hyeon-U Kim)
January 6, 2010	TD Bank	\$500	Hwangini (a company owned and controlled by Sang-Kyu Seo)



Date of Charge	Credit Card	Amount	Description
January 22, 2010	TD Bank	\$1,896.97	Li Nails Plus (a company controlled by defendant Sang-Hyun Park)

**60. Defendant Sung-Sil Joh**

a. As described in Paragraph 51 above, defendant Sung-Sil Joh, using the Chinese name Zhanhong Fan and a corresponding 586 social security number, fraudulently obtained an identification card in that name from the IDMV.

b. In or about April 10, 2009, an individual using the Chinese name Zhanhong Fan and a corresponding 586 social security number applied for and obtained Visa credit cards issued by Bloomingdale's and Macy's. Based on this investigation, Your Affiant believes that defendant Sung-Sil Joh is the individual who obtained these credit cards using the Chinese name Zhanhong Fan with the corresponding 586 social security number. Thereafter, these fraudulently acquired credit cards were used to make the following fraudulent credit card charges (both "kkang" and purchases at retail stores):

Date of Charge/ Credit Card	Amount	Description
April 10, 2009 Bloomingdale's	\$3,909.59	Li Nails Plus (a company controlled by defendant Sang-Hyun Park)
April 17, 2009 Macy's	\$3,520.67	Li Nails Plus (a company controlled by defendant Sang-Hyun Park)
May 1, 2009 Bloomingdale's (store credit)	\$6,800	diamond jewelry
June 19, 2009 Bloomingdale's	\$5,625	For Your Joy (a company owned and controlled by FNU LNU#1, a/k/a "FNU Choi," "Xijun Gu")
June 19, 2009 Bloomingdale's	\$500	New M and K Global

Date of Charge/ Credit Card	Amount	Description
June 20, 2009 Macy's	\$3,250.79	Erins Supply (a company owned and controlled by defendant Jung-Hyuck Seo and an employee of defendant Sung-Sil Joh)
June 20, 2009 Macy's	\$2,500	Cocoxu Corp. (defendant Sang-Hyun Park's company)

c. According to Macy's, the above charges and others were not paid, resulting in a loss of approximately \$12,500. According to Bloomingdale's, the above charges and others were not paid, resulting in a loss of approximately \$25,000.

d. On or about June 17, 2009, a telephone payment, in the amount of \$2,760.62, was made against the Bloomingdale's store credit card issued in the name of defendant Sung-Sil Joh's Chinese identity Zhanhong Fan with a corresponding 586 social security number. On or about June 19, 2009, this credit card was used to purchase a Louis Vuitton item in the amount \$1,670 and a Ferragamo item for \$452 at a Bloomingdale's store in New York. On or about June 24, 2009, the \$2,760.62 telephone payment was returned for insufficient funds.

61. Joong-Hyun Jung (see Paragraphs 72m, 84e, and 96).
62. Osung Kwon (see Paragraphs 81i, 84d, 85q, 94q, 95a, and 96).
63. Defendant Jin LNU

#### Use of Fraudulently Obtained Identity Document

a. As described in Paragraph 51 above, defendant Jin LNU, using the Chinese name Zhaofang Chen and a corresponding 586 social security number, fraudulently obtained an identification card and a driver's license in that name from the IDMV. Defendant Jin LNU Lee, using the Chinese name Jianxin Jiang and a corresponding 586 social security number, fraudulently obtained an identification card in that name from the IDMV.

b. In or about December 2008, according to records from Chase Manhattan Bank, TD Bank, Target and National Bank, defendant Jin LNU, using the Chinese name of Zhaofang Chen, a corresponding 586 social security number, and the fraudulently obtained Illinois driver's license that he had obtained, applied for and received credit cards from these credit card companies. Numerous charges were made on each credit card but were not paid, resulting in a loss of approximately \$5,000.

### The Check-Kiting Scheme

c. On or about November 4, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Seung-Ho Noh. During this intercepted conversation, they discussed check-kiting:

Noh: I was going to do a few bank[s] for someone .  
. . . PNC is asking for a passport to open an account.

Park: Yes.

Noh: You said to open like five, right?

Park: Which banks did you open so far?

Noh: Citi . . . . TD. . . . Chase. . . . BOA. . .  
. Then, that's four. The other place can be any place like maybe HSBC?

Park: Yes. HSBC is okay, big brother. . . . When I tried recently, my customer just started one . . . . [the customer] was able to take out \$20,000 from BOA.

Noh: Oh, really?

Park: Yes. It looks like [we] can get about \$15,000 to \$20,000 per bank.

Noh: Oh, [I] just need to do checking and savings, right?

Park: Yes, and the corporate [account] too.

\* \* \* \*

Park: If [I] take out \$20,000, I give \$10,000 to the customer and take \$10,000 as a processing fee.

\* \* \* \*

Noh: How much do you usually get from one bank?  
If you open it like . . . . about \$20,000?

Park: In my opinion, there shouldn't be a problem taking out about \$20,000 from one bank. . . .  
. [f]rom each account.  
Noh: Then . . . if one person can take . . . about \$50,000.  
Park: Our method is a little different from other brokers.  
Noh: Oh, really?  
Park: Yes, that's why [we] are able to take out a lot. The others [brokers] can take out about \$8,000 , but that's about it.

d. On or about August 4, 2009, according to records from Capital One Bank and photographs from the bank's surveillance video, defendant Jin LNU entered a bank branch in Flushing, New York and opened a checking account in the name of Zhaofang Chen, a Chinese name, using a genuine but fraudulently obtained Illinois driver's license in that name, and a corresponding 586 social security number. In addition, according to bank records, defendant Jin LNU also opened a checking account at the Bank of America in the name of Zhaofang Chen.

e. On or about September 10, 2009, in furtherance of a check-kiting scheme, a \$500 check, drawn on the Bank of America checking account of Zhaofang Chen (an identity obtained and used by defendant Jin LNU), was deposited into a bank account, in the name of Deshang Zhang (an identity obtained and used by defendant Hyeon-U Kim), at Flushing Savings Bank, Flushing, New York. (see Paragraph 63f below for transactions between the Desang Zhang and an account in the Y.L. Identity).

f. On or about September 22, 2009, in furtherance of a check-kiting scheme, defendant Jin LNU caused three checks, each in the amount of \$1,000, payable to Y.L. [the Chinese identity purchased by Cooperating Witness One from defendant Sang-Hyun Park], and drawn on the Flushing Savings Account of Deshang Zhang [defendant Hyeon-U Kim], to be deposited into three different bank accounts opened in the name of Y.L.

g. On or about September 24, 2009, in furtherance of a check-kiting scheme, a check, drawn on the Capital One Bank account of Zhaofang Chen and in the amount of \$4,200, was deposited into a bank account in the name of Y.L. [Cooperating Witness One]. This check was returned for insufficient funds.

h. On or about September 25, 2009, a check, drawn on the Capital One Bank account of Zhaofang Chen [a Chinese identity used by defendant Jin LNU] and in the amount of \$5,200, was

deposited into a bank account in the name of Y.L. [Cooperating Witness One]. This check was returned for insufficient funds.

i. On or about September 25, 2009, over the First Park Facility, defendant Sang-Hyun Park received in incoming telephone call from defendant Jin LNU. During this intercepted conversation, they discussed kiting checks through accounts opened in the name of Y.L. [Cooperating Witness One]. The following discussion ensued, in substance and in part:

Jin LNU: There is some sort of a problem with [Y.L. account]. . . . There is some problem with [Y.L.].

Park: Why?

Jin LNU: Well, it keeps getting pending [meaning money cannot be withdrawn from the account].

Park: Oh, what does internet banking show?

Jin LNU: Oh, it says \$900 is available. And \$4,200 is in pending. \$4,300 is in pending.

Park: Is that so? Then since tomorrow is Saturday. Does it change on a Saturday?

Jin LNU: Yes. The problem is how many days the check stays alive [i.e., a reference to the "float"]. So later, big brother, [deposit] one more check. (emphasis added).

Park: Um.

Jin LNU: There is one for \$5,200 and \$5200.

\* \* \* \*

Park: It is \$5,600 for the 26th.

Jin LNU: Yes. . . . Yes, yes. It doesn't matter if you switch them before depositing. Deposit it today, big brother. Once the money is collected, they will go around anyways. And I have to meet this guy and go to the bank. It worked for this guy. . . . And this guy [Cooperating Witness One], I will call him and meet him.

Park: Okay.

j. On or about September 25, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Jin LNU. During this intercepted conversation, the following discussion ensued, in substance and in part:

Jin LNU: Let me ask you something. . . . [Cooperating Witness One's Chinese identity, Y.L.'s] PNC Bank.  
Park: Who, which?  
Jin LNU: [Y.L.'s] PNC Bank.  
Park: Yes.  
Jin LNU: The money should be available as cash in one or two days . . . . [b]ut when I checked at the bank, the person who did the deposit . . . . I think a woman did it. [She] didn't sign the [deposit slip]. And the money is tied, now. We have to unlock it.

\* \* \* \*

Jin LNU: Yes, yes, so, now I can't check up, big brother. [Cooperating Witness One] . . . has to go and confirm it or phone in and unlock it. . . .  
Park: Then, who deposited it? Was it [defendant Dong-Il Kim]?  
Jin LNU: Is there a woman? The hand writing was a woman's.  
Park: The hand writing, Hyun-Jin LNU [defendant Hyun-Jin LNU] wrote it on the deposit slip.

64. **Min-Soo Son** (see Paragraphs 72c and 95b).

65. **Defendant Young-Hee Ju**

a. As described in Paragraph 51 above, defendant Young-Hee Ju, using the Chinese name Mingji Piao and a corresponding 586 social security number, fraudulently obtained a driver's license in that name from the IDMV.

b. Beginning in or about December 2007, defendant Young-Hee Ju, using the Chinese name Mingji Piao, a corresponding 586 social number, and the fraudulently obtained Illinois driver's license that she had obtained, applied for and obtained credit cards from Bloomingdale's, GE Money Bank/The Gap, Lexus Financial Savings, and Washington Mutual, among others.

c. From in or about December 2007 through in or about August 2009, defendant Young-Hee Ju, using a Bloomingdale's credit card in the name of Mingji Piao, made numerous purchases with this card, including clothes, jewelry, make up, sunglasses, and gift cards. These charges, among others, were not paid, resulting in a total loss of approximately \$1,600.

d. In total, Washington Mutual reported a total loss of approximately \$36,000, resulting from unpaid charges on the credit card obtained by defendant Young-Hee Ju in the name of Mingji Piao.

e. On or about January 20, 2009, according to records from Toyota Motor Credit Corporation, defendant Young-Hee Ju applied for and received a car loan in Bergen County, New Jersey, in the approximate amount of \$40,593, from Toyota Motor Credit Corporation to purchase a black, 2009 Lexus SUV. On the application, defendant Young-Hee Ju represented that her name was Mingji Piao with a corresponding 586 social security number. She listed her employer as Jung Skin Productions. Furthermore, on this application, defendant Young-Hee Ju used her actual Fort Lee, New Jersey address and her actual phone number (**which number was the Ju Target Facility**). This loan went into default within two months on the purchase of the car. According to records from Toyota Motor Credit Corporation, the company repossessed the car.

f. On or about March 25, 2009, in Palisades Park, New Jersey, federal agents observed defendant Young-Hee Ju meet with Cooperating Witness Two. During this meeting, defendant Young-Hee Ju arrived in a black, 2009 Lexus SUV.

g. On or about July 27, 2009, over the Ju Target Facility, a representative from Toyota Motor Credit Corporation called defendant Young-Hee Ju concerning the black, 2009 Lexus SUV. During this intercepted conversation, the following discussion (in English) ensued, in substance and in part:

Company: Hello, I'm looking for Ming Pia [Mingji Piao].  
Ju: No, you got a wrong number now.  
Company: Is this Ming Piao?  
Ju: No.

\* \* \* \*

Company: Okay, this is not Ming Piao?  
Ju: No.  
Company: Is this Jung Skin Productions?  
Ju: Yes, Jung Productions, yes.  
Company: Yeah?  
Ju: Yes.  
Company: Okay, so, you drive a Lexus, right?  
Ju: No, Oh, no, no, no. She's not home now.

\* \* \* \*

66. Defendant Hyo-Il Song

a. As described in Paragraph 51 above, defendant Hyo Il Song, using the Chinese names Yan Hua Wei (IDMV), Minghao Li (TDMV), and Dongyun Zhou (PennDOT) and corresponding 586 social security numbers, fraudulently obtained driver's licenses in those names. In addition, defendant Hyo-Il Song, using the Chinese name Haizhe Pei and a corresponding 586 social security number, fraudulently obtained an identification card in that name from the IDMV.

b. In or about July 2007, defendant Hyo-Il Song, using the Chinese name identity Yan Hua Wei, a corresponding 586 social security number, and the fraudulently obtained Illinois driver's license that he had obtained, applied for and received credit cards from Bank of America (three credit cards), Chase Bank, HSBC, PNC Bank, and Target National Bank.

c. On or about September 6, 2007, defendant Hyo Il Song, using the identity Yan Hua Wei and a corresponding 586 social security number, obtained a cash advance, in the approximate amount of \$10,000, by issuing himself a Bank of America convenience check charged to the Yan Hua Wei Bank of America credit card. This charge and other charges were not paid, resulting in a loss of approximately \$25,000.

d. On or about July 22, 2008, defendant Hyo Il Song, using the identity Yan Hua Wei and a corresponding 586 social security number, made and caused to be made a check payment, in the approximate amount of \$3,900, to the Target National Bank credit card. On or about July 23, 2008, defendants Hyo-Il Song and Sang-Hyun Park, fraudulently charged approximately \$3,685 to the Target National Bank credit card in the name of Yan Hua Wei through Ameth Thread. On or about July 29, 2008, defendants Hyo-Il Song and Sang-Hyun Park, fraudulently charged approximately \$3,590 to the Target National Bank credit card in the name of Yan Hua Wei through Mono Corp. These charges and other charges were not paid, resulting in a loss of approximately \$11,500 on this credit card.

e. On or about February 4, 2009, according to records from Toyota Motor Credit Corporation, defendant Hyo-Il Song, applied for and received a car loan in Westchester County, New York, in the approximate amount of \$55,285 from Toyota Motor Credit Corporation to purchase a grey, 2008 Lexus sedan. In or about early March 2009, a law enforcement officer observed and video recorded defendant Hyo-Il Song driving the same 2008 gray Lexus sedan, bearing a New York license plate. Furthermore,



according to records from the New York Department of Motor Vehicles, this car was registered in the name of Minghao Li. This same 2008 gray Lexus sedan was observed parked in the driveway of defendant Hyo-Il Song's residence in Palisades Park, New Jersey. According to records from the finance company, the loan defaulted. Before this loan defaulted, according to records from the finance company, two payments were received: (1) a check, drawn on the account of 90 You & Me, in the amount of \$948.94; and (2) a check, drawn on the account of 90 You & Me, in the amount of \$948.94. Defendant Hyo-Il Song controlled the bank account of 90 You and Me. This car was repossessed.

f. Beginning in or about early May 2009, defendant Hyo-Il Song, using the Chinese name Haizhe Pei and a corresponding 586 social security number, applied for and received credit cards from HSBC Saks Fifth Avenue, HSBC Neiman Marcus, Nordstrom, Macy's, and Bloomingdale's.

g. In or about early March 2009, a law enforcement officer observed and video recorded defendant Hyo-Il Song driving a 2005 Lexus SUV with a New Jersey license plate. According to records from the New Jersey Department of Motor Vehicles, this car was registered in the name of Haizhe Pei. Furthermore, this same car was observed parked in the driveway of defendant Hyo-Il Song's residence in Palisades Park, New Jersey.

h. On or about October 1, 2009, the HSBC Saks Fifth Avenue credit card defendant Hyo-Il Song obtained using the Haizhe Pei identity was used to purchase a \$12,350.48 watch from a Saks Fifth Avenue retail store, in Bergen County, New Jersey. HSBC Saks Fifth Avenue never received payment for this purchase and, in total, sustained approximately \$16,000 in loss on this credit card.

i. On or about March 9, 2010, defendant Hyo-Il Song, using the Chinese name Dongyun Zhou and a corresponding 586 social security number, made a check, payable to Bloomingdale's Visa, in the approximate amount of \$4,390. On or about March 10, 2010, a charge in the amount of approximately \$4,650 was made at 90 You and Me, defendant Hyo-Il Song's company. The check payment in the amount of \$4,390 was later returned for insufficient funds.

j. As described in Paragraph 107 below, defendant Hyo-Il Song was a collusive merchant.

67. Defendant Dong-Won Kim

a. As described in Paragraph 51 above, defendant Dong W. Kim, using the Chinese names Guangying Zhang, Huaying Lu, and Wei Yun Zhong and corresponding 586 social security numbers, fraudulently obtained one identification card and three driver's licenses in those names from the IDMV.

b. On or about August 29, 2008, according to records from Toyota Motor Credit Corporation, defendant Dong-Won Kim, applied for and received a car lease in Westchester County, New York, in the approximate amount of \$46,000 (the value of the car) from Toyota Motor Credit Corporation to lease a black, 2008 Lexus SUV. On the application, defendant Dong-Won Kim represented that his name was Guangying Zhang with a corresponding 586 social security number. Furthermore, on this application, defendant Dong-Won Kim used his actual New York address and provide an HSBC credit card in the name of Guangying Zhang and a Chase bank statement in the same name. This lease went into default in or about January 2009. According to records from Toyota Motor Credit Corporation, it has been unable to repossess this vehicle because it cannot be located.

c. On or about September 8, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Dong-Won Kim. During this intercepted conversation, the following discussion ensued, in substance and in part:

Park: Did you sell the car. The Lexus?  
Kim: No, not yet.  
Park: Why? Did you decide not to give it to that guy?  
Kim: It's not that. They were going to give only \$1,500.  
Park: . . . . They will give you up to 15% of the vehicle's market value.  
Kim: Without anything? . . . . There is nothing, I am telling you. . . . Expired registration, no insurance, no title.  
Park: Needs to go to China, China. . . . The bastard in Dallas. The dude collects whole bunch of cars and sends them to China.

\* \* \* \*

Park: He went around Georgia, Dallas, Texas and now he is in LA [Los Angeles]. He is the one who

could get a driver's license without the test at \$5,000. I did that once in the past. He does a lot of stuff going all over the country. He knows a lot of sources. . . . There are a ton of people who can't make car payments in LA, right?

Kim: Right.

Park: There are lots cars [sic] like that in New York and [he] asked to collect them. Will give up to 15% . . . .[f]or \$40,000, it's a good amount. It's better than giving [the car] away at \$1,500-\$2,000.

Kim: Right.

Park: We will get together when he comes.

d. In or about August 2008, defendant Dong-Won Kim, using the Chinese name Guangying Zhang and a corresponding 586 social security number, applied for and obtained credit cards from American Express, Chase Bank (three credit cards), Citibank, Bloomingdale's, Macy's, and HSBC Bank.

e. On or about September 25, 2008, defendant Dong W. Kim, using a Bloomindale's credit card in the name of Guangying Zhang, purchased, and caused to be purchased, Louis Vuitton merchandise in the approximate amount of \$750. On or about October 7, 2008, defendant Dong-Won Kim, using a Macy's credit card in the name of Guangying Zhang, purchased, and caused to be purchased, Ferragamo merchandise in the approximate amount of \$1,430. These charge were not paid.

f. On or about October 22, 2008, a check, in the amount of \$10,400, was transmitted to HSBC credit card for payment of charges on the credit account of Guangying Zhang. On or about October 27, 2008, this payment was returned for insufficient funds. Before this payment was returned for insufficient funds, the following fraudulent charges were made on this credit card:

g. On or about October 24, 2008, defendants Dong W. Kim and Sang-Hyun Park fraudulently charged approximately \$5,325 to an HSBC credit card in the name of Guangying Zhang through Mono Corp. (a company controlled by defendant Sang-Hyun Park).

h. On or about October 25, 2008, defendants Dong W. Kim and Sang-Hyun Park fraudulently charged approximately \$2,920 to an HSBC credit card in the name of Guangying Zhang through Ameth Thread a company controlled by defendant Sang-Hyun Park).

i. In addition, as described in Paragraph 50 above, defendant Dong-Won Kim was a broker of 586 social security cards and driver's licenses.

68. **Defendant Seung-Ho Noh** (defendant Seung-Ho Noh was a broker of 586 social security cards, counterfeit driver's licenses, and used these 586 social security numbers to commit a variety of frauds, including "check jobs" (check-kiting) and "tax work" (tax fraud)).

69. **Defendant Matthew J. Kang** (as described in Paragraphs 13 above and 102 below, defendant Matthew J. Kang conspired with the Park Criminal Enterprise and others to fraudulently build credit scores for the purpose of committing fraud).

70. **Defendants Rita S. Kim and Hyon-Suk Chung** (as described in Paragraph 103 below, defendants Rita S. Kim and Hyon-Suk Chung conspired with the Park Criminal Enterprise and others to fraudulently build credit scores for the purpose of committing fraud),

71. **Defendant Young-Woo Ji** (as described in Paragraphs 81 and 104 below, defendant Young-Woo Ji conspired with the Park Criminal Enterprise and others to fraudulently build credit scores for the purpose of committing fraud).

72. **Defendants Sang-Kyu Seo and Amy Yang**

a. On or about September 21, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Sang-Kyu Seo (the husband of defendant Amy Yang). During this intercepted conversation, the following discussion ensued, in substance and in part:

Park: Why did you call, big brother?  
Seo: What is the status?  
Park: First, your wife's, what is it, BOA was opened? [defendant Sang-Kyu Seo's wife is defendant Amy Yang, a/k/a "Yulan Qian" and "Amy Pitts"]  
Seo: Um, um.

Park: So we have to wait until build up is done. Build up was started so [we] just need to wait until it's done.

Seo: Mm-mm.

Park: And then, when the debit card arrives, the debit card becomes a second ID, so you take that to the [bank] and open an account. . . . The reason for that is [that bank] doesn't approve cards or loans right after you open a bank account. You need transaction history. . . . That's why, since it takes a month or two for the build up, so during that period [we] are opening the account and getting it ready.

Seo: Mm-mm.

b. On or about October 3, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Sang-Kyu Seo. During this intercepted conversation, they discussed "busting out" defendant Sang-Kyu Seo's personal and business credit cards:

Park: What about business cards?

Seo: In the case of business cards, they also almost full [charged to the maximum credit amount]. I have three \$12,000 one[s]. At first, they gave me \$20,000 but reduced to \$12,000. . . . Corporate ones are also full.

\* \* \* \*

Park: Then, if you are considering doing it, we can do it only once for Chase. What it means. . . we can take out up to the limit.

Seo: Yes, yes.

Park: Yes. In the case of Chase, to make cash, we have to purchase merchandise and resell them [sic].

Seo: Uh, it means I have to buy something with it?

Park: Yes. You have to buy something because if we swipe [i.e., charge] the card with merchant, to be frank, to make cash, or after I check [the] statement and if it is okay, you can take cash out from the casino.

Seo: Yes, yes.

\* \* \* \*

Seo: Is it legitimate?  
Park: Yes, there is no problem. Yes, I am doing it because there is no problem. But, you have to expect your credit score will be dropped.  
Seo: Of course. . . .  
Park: You know it. If you don't pay for the debt, the score becomes bad.  
Seo: That's right. Anyhow, it was already dropped.

\* \* \* \*

Park: And then, you don't have to worry about if someone will come from a bank.  
Seo: Yes, yes. Anyway, later . . . . I will declare Chapter 7 or Chapter 13 bankruptcy.

c. In furtherance of the scheme to "bust out" defendant Sang-Kyu Seo's personal credit cards, on or about December 18, 2009, defendant Min-Soo Son entered a Bank of America branch in Fort Lee, New Jersey and made a payment, in the form of a check drawn on the account of Erins Skin Care, Inc., in the amount of \$18,462, toward defendant Sang-Kyu Seo's Bank of America credit card. On or about December 21, 2009, this check was returned for insufficient funds. On or about December 18, 2009, the Bank of America received a telephone inquiry, from a phone number used by defendant Sang-Hyun Park, checking on the status of defendant Sang-Kyu Seo's Bank of America credit card.

d. The Bank of America reported a loss of approximately \$75,000 on this credit card. Furthermore, according to Bank of America, a second credit card issued to defendant Sang-Kyu Seo resulted in a loss of approximately \$11,500. Before the credit card was "busted out," a fraudulent charge, in the approximate amount of \$4,899, was made on this credit card to Li Nails Plus.

e. On or about December 22, 2009, according to records from HSBC Bank, defendant Sang-Kyu Seo maintained a business line of credit in the name of Pier 7 Corporation. On or about December 22, 2009, this line of credit had been drawn down to a \$0 available balance. On that day, in Los Angeles, California, a \$47,000 check was deposited into the Pier 7 Corporation line of credit account belonging to defendant Sang-Kyu Seo thereby increasing the available credit to approximately \$47,000. This check was later returned for insufficient funds.

f. On or about December 24, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Sang-Kyu Seo. During this intercepted conversation, defendant Sang-Kyu Seo stated that he took out approximately \$20,000 in cash from an HSBC checking account. Defendant Sang-Kyu Seo then advised that the balance, of approximately \$27,000, was transferred to a checking account.

g. On or about December 24, 2009, defendant Sang Kyu Seo issued a check, drawn on this Pier 7 Corporation line of credit, in the amount of \$27,000 and deposited it into a HSBC business checking account in his name.

h. On or about December 24, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Sang-Kyu Seo. The following conversation ensued, in substance and in part:

Park: Well, now the problem is you took out the money from the bank because you deposited a check you received from somebody and the check [funds] has become available.

Seo: Yes, yes.

Park: The bank employee was not stupid to give you the money when there was no money available in the account, was he/she?

Seo: Uh, uh, uh.

Park: Therefore, what you should do is this: You are the party that received the money, big bro. Right?

Seo: That is right.

Park: Yes, you received the money and because the money was cleared at the bank, and "I" [sic] confirmed with the bank in the morning and took out the money. . . . [s]o, frankly speaking between us, when we speak openly between us, it is not that we deposited a check that will bounce. . . .

i. On or about December 29, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Sang-Kyu Seo. During this intercepted conversation, defendant Sang-Hyun Park asked if defendant Sang-Kyu Seo if he was coming to defendant Sang-Hyun Park's office to give him his fee. Defendant Sang-Kyu Seo stated, "I told you to wait two, three days for that." Defendant Sang-Hyun Park responded, "What's there to wait? Those [co-conspirators] in LA are going crazy over it [their fee]."

j. On or about December 31, 2009 and on or about January 5, 2010, defendant Sang-Kyu Seo issued two checks, to Citi Apparel, in the approximate amounts of \$4,950 and \$4,800, respectively. These two checks were endorsed by defendant Hyun-Jin LNU (using the name Hai Hua Xu) and deposited into the Citi Apparel account.

k. In total, defendants Sang-Kyu Seo and his co-conspirators fraudulently obtained in excess of \$100,000 by "busting out" business and personal credits cards and lines of credit.

l. From in or about February 2010 through in or about April 2010, defendant Amy Yang, using the identity Yulan Qian and a corresponding 586 social security number, obtained approximately two credit cards from Target National Bank and Chase Bank, resulting in a loss of approximately \$3,000. In addition, defendant Amy Yang "busted out" credit cards in her name through defendant Sang-Hyun Park and his co-conspirators, resulting in losses totaling approximately \$120,000 to several credit card companies.

m. On or about June 30, 2010, according to records from Valley National Bank and photographs from the bank's surveillance video, defendant Amy Yang [defendant Sang-Kyu Seo's wife] entered a Valley National Bank in Bergen County and opened an account in the name of Yulan Qian, a Chinese name, a counterfeit Nevada driver's license, and a corresponding 586 social security number (which social security number was not issued to defendant Amy Yang by the United States). Furthermore, photographs from the bank's surveillance video reveals that defendant Joong-Hyun Jung accompanied defendant Amy Yang into the bank. On the application to open the account, defendant Amy Yang, using the name Yulan Qian, listed her actual home address in Palisades Park, New Jersey (where a law enforcement officer, while conducting surveillance, observed defendant Amy Yang enter and exit).

n. As described in Paragraph 53u above, defendant Sang-Kyu Seo was a collusive merchant.



73. Defendant Hyun-Yop Sung

a. As described in Paragraph 51 above, defendant Hyun-Yop Sung, using the Chinese name Shanji Li and a corresponding 586 social security number, fraudulently obtained a driver's license in that name from the IDMV.

b. Beginning in or about March 2009, according to records from PNC, Chase Bank, Capital One, and credit reporting agency, defendant Hyun-Yop Sung, using the Chinese name Shanji Li, a corresponding 586 social security number, the fraudulently obtained Illinois driver's license he had obtained, and an address belonging to defendant Hyun-Yop Sung in Carlstadt, New Jersey, applied for and received several credit cards in the name of Shanji Li.

c. Numerous charges were made on the credit cards issued in the name of Shanji Li that were not paid, resulting in a loss of approximately \$30,000.

74. Defendant FNU LNU#1, a/k/a "Mr. Choi" and "Xijun Gu"

a. As described in Paragraph 51 above, defendant FNU LNU#1, using the Chinese name Xijun Gu and a corresponding 586 social security number, fraudulently obtained a driver's license in that name from the IDMV.

b. In or about March 2009, according to records from various credit card companies and a credit reporting agency, defendant FNU LNU#1, using the Chinese name Xijun Gu, a corresponding 586 social security number, the fraudulently obtained Illinois driver's license that he had obtained, and an address belonging to defendant FNU LNU#1, applied for and received approximately 9 credit cards from Bank of America, Macy's, Bloomingdale's, Saks Fifth Avenue, Nordstrom, Target National Bank, and GE Money Bank. Numerous charges were made on each credit card but were not paid, resulting in a loss of approximately \$30,000.

c. On or about September 8, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant FNU LNU#1, a/k/a "Mr. Choi" and "Xijun Gu." During this intercepted conversation, defendant FNU LNU#1 complained about extensive delays concerning another customer's credit build up. Defendant Sang-Hyun Park responded that the credit build ups being done by Shin Hwa [defendants Rita S. Kim and Hyon-Suk Chung] are being delayed "not just yours, but mine also." Furthermore during this conversation, defendant Sang-Hyun

Park stated, "I also after giving it to President Daniel [Hyo-Il Song] before, in the middle . . . so you and I are in the same situation. . . . In Cheng Yu Ma's case [see Paragraphs 84e, 89h, and 96 below], the address is not verified so we cannot do any work." Later during that conversation, defendant Sang-Hyun Park stated that he verified the address for Cheng Yu Ma through a credit report agency, and he planned to make two credit cards with this information. Defendant FNU LNU#1 stated, "Exactly."

d. On or about September 11, 2009, a Target National Bank credit card issued in the name of Xijun Gu was charged by Star 72 Jewelry in the amount of approximately \$2,739.

e. On or about September 14, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant FNU LNU#1, a/k/a "Mr. Choi" and "Xijun Gu." During this intercepted conversation, defendant FNU LNU#1 stated that a representative of Citibank told him that the merchant "was a bad merchant," to which defendant Sang-Hyun Park replied, "With Citi you can never use our [credit card] machine. . . . the reason is they have the old record of our second work [the second round of "bust outs"], you see? So, you need to wait at least six months before you do the swipe. . . . You should remember, with Citi, when you do the swipe one after another the cardholder as well as the merchant get in trouble." Defendant FNU LNU#1 replied, "And the company gets on the black list." Later in the conversation, defendant FNU LNU#1 stated that after building credit that one could take approximately \$30,000 from the bank and added: "It never failed. We always got money from the bank."

f. On or about September 23, 2009, a Bloomingdale's credit card issued in the name of Xijun Gu was charged by Star 72 Jewelry in the amount of approximately \$3,865. On or about October 10, 2009, this same credit card was charged by Lu 72 Fashion, Inc. in the amount of approximately \$4,190. On or about October 14, 2009, this same card was charged by Cocoxu in the amount of approximately \$200. On or about October 8, 2009, a telephone payment in the amount of approximately \$4,214 was made toward this credit card. On or about October 16, 2009, this payment was returned for insufficient funds.

g. On or about October 13, 2009, according to records from Nordstrom and phone records, a telephone inquiry (not on either the First Park Facility or the Second Park Facility) from a telephone used by defendant Sang-Hyun Park was made to Nordstrom, checking on available credit related to the credit card account of Xijun Gu.

h. On or about April 14, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant FNU LNU#1, a/k/a "Mr. Choi" and "Xijun Gu." During this intercepted conversation, defendant Sang-Hyun Park asked, "Were you making passports with a local [driver's license]?" and defendant FNU LNU#1 replied, "I have been [making] any one of the fifty-one [sic] states, whatever they ordered." Defendant Sang-Hyun Park then asked, "Were you replicating a passport book?" and defendant FNU LNU#1 replied, "Yes, I even replicate the bar code on the back so when you swipe it the number would show up." Defendant Sang-Hyun Park asked, "Also ID?" Defendant FNU LNU#1 replied, "Yes, yes . . . . New Jersey ID, it looks so real not even a cop can tell." Defendant FNU LNU#1 stated he was no longer making identifications. Later during the conversation, defendant FNU LNU#1 stated that he has "many Korean social [security cards]." When defendant Sang-Hyun Park asked if these social security cards were for sale, defendant FNU LNU#1 replied, "I have quite a few Koreans [social security cards]. My successors will sell and manage them. I just want to keep one or two to do the build up once a year for my own."

i. As described in Paragraph 109 below, defendant FNU LNU#1 was a collusive merchant.

75. **Defendant Hyeon-U Kim**

a. As described in Paragraph 51 above, defendant Hyeon-U Kim, using the Chinese name Deshang Zhang and a corresponding 586 social security number, fraudulently obtained an identification card in that name from the IDMV. Defendant Hyeon-U Kim, using the Chinese name Xiurong Xu and a corresponding 586 social security number, fraudulently obtained a driver's license in that name from PennDOT.

b. Beginning in or about April 2007, defendant Hyeon-U Kim, using the Chinese name Deshang Zhang, a corresponding 586 social security number, and the fraudulently obtained Illinois driver's license that he obtained, applied for and received several credit cards from Chase Bank and HSBC Bank.

c. Numerous charges were made on these credit cards and others. For example, from on or about January 9, 2008 though January 10, 2008, a Chase credit card was used to obtain approximately \$15,000 in gift cards from various stores in New Jersey. The charges and others on these credit cards were not paid, resulting in a loss of approximately \$50,000.

d. Beginning in or about April 2008 ,defendant Hyeon-U Kim, using the Chinese name Xiurong Xu, a corresponding 586 social security number, and the fraudulently obtained Pennsylvania driver's license that he obtained, applied for and received several credit cards from Chase Bank, Capital One, HSBC Bank/Best Buy, and Macy's. Based on this investigation, Your Affiant believes that defendant Hyeon-U Kim is the individual who obtained these credit cards using the Chinese name Xiurong Xu with the corresponding 586 social security number.

e. Numerous charges were made on each credit card. The charges on these credit cards were not paid, resulting in a loss of approximately \$8,000.

f. As described in Paragraph 106 below, defendant Hyeon-U Kim was a collusive merchant.

76. **Defendant Edward M. Ha** (as described below in Paragraph 108, defendant Edward M. Ha was a collusive merchant).

77. **Defendant Jong-Hoon Kim**

a. As described in Paragraph 51 above, defendant Jong-Hoon Kim, using the Chinese name Zhengshu An and a corresponding 586 social security number, fraudulently obtained an identification card and a driver's license in that name from the IDMV. In addition, defendant Defendant Jong-Hoon Kim, using the Chinese names Ruiping Chen and Chun Shi Huang and corresponding social security numbers, fraudulently obtained identification cards in those name from the IDMV.

b. On or about May 19, 2009, defendant Jong-Hoon Kim, using the Chinese identity Zhengshu An and a corresponding 586 social security number, applied for and received a credit card machine under the business name Red Coco Int'l from a merchant bank. On this application, defendant Jong-Hoon Kim reported that this company was engaged on the business of wholesale seafood and grocery distribution; he listed the business' credit card sales as \$30,000 per month; and he used his actual address, an apartment in Ridgely Park, New Jersey. During this investigation, a law enforcement officer conducting surveillance near this premises, observed and video recorded defendant Jong-Hoon Kim exiting this apartment. Furthermore, on this application, defendant Jong-Hoon Kim provided checking account information, namely, a TD Bank account in the name Red Coco Int'l, so the proceeds of credit card transactions could be deposited into this account.

c. During this investigation, it was determined that defendant Jong-Hoon Kim applied for and received additional credit card machines from other merchant banks.

d. On or about September 28, 2009, over the First Park Facility, defendant Jong-Hoon Kim. During this intercepted conversation, the following discussion ensued, in substance and in part:

Kim: Someone wants to do a card. How should I do this? What items do you need?  
Park: Same as before. . . . Write down all the information. And license copy and social and the rest, card and statement.

\* \* \* \*

Kim: How many percent?  
Park: It is 50. 50 to the customer.  
Kim: So after discount, the cash given is 50, right?  
Park: Yes, yes. 50. Yes.  
Kim: . . . . In the half and half, you and I will share, right?  
Park: Yes, yes. It's the same. Nothing changed, big brother. Okay?

e. On or about November 6, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Jong-Hoon Kim. During this intercepted conversation, the following discussion ensued, in substance and in part:

Kim: Anyway, I heard that you are doing some of the 586 work these days.  
Park: Oh. [Laughs]. 586?  
Kim: Well, you change the license[s], there was a such thing since a long time ago. Can you do it fine?  
Park: What thing, what thing?  
Kim: You know there is a thing like opening a 586 account and pull out. . . .  
Park: [cutting off Kim] Oh, you mean the check work? [a reference to kiting checks to commit bank fraud].  
Kim: Yeah  
Park: Oh. That, I am doing that steadily. . . . . I am still doing that. . . .

\* \* \* \*

Kim: . . . . I sure, sure you have a lot of [5]86s  
you have already done.  
Park: With that, I pulled \$20,000 out per account.  
Kim: Wow, you did well!  
Park: Yes, I am doing that . . . quietly. I don't  
let others know.

\* \* \* \*

Kim: If you get \$20,000, how much do you take?  
You probably take half off [of] \$20,000, do  
you?  
Park: Yes, we charge 50%.  
Kim: That's not bad. Hey, can I use [the] 586  
that I have? You know I have some too.  
Park: I can't do yours because we have too many.  
Kim: Why?  
Park: You think about it? How many do you think we  
opened altogether per each social number  
[sic] for people who have 586? We opened at  
least three to four [accounts]. . . . The  
time it takes for us to open is not just one  
or two days, but it takes one month. . . .  
[T]o do the work and pull money. . . . So, if  
several tens of people, not just one or two,  
bring it, it amount[s] to 30 [accounts] of  
them when we do three for each person even  
for 10 people. . . . Besides, you have to  
open so many bank books too. . . . Then, when  
we have to manage them one month on our side,  
we need so many people. . . . One person can  
manage only three to four accounts. . . . I  
have to have tens of employees to do that. .  
. .

\* \* \* \*

Park: [B]ut if you have 586 customer, give them to  
me for social or something.  
Kim: . . . . I can give you the social number  
[sic] and bank account that is opened then. .  
. . How much does that get paid? Does it get  
paid about \$10,000?  
Park: For that too, I get about \$7,000 and  
customers can take about \$3,000 per one  
social number [sic].  
Kim: Oh, for each one?  
Park: Yes.

e. In addition, as described in Paragraph 89 below, defendant Jong-Hoon Kim conspired with defendants Sang-Hyun Park, Hag-Sang Jang, and others to "bust out" Hag-Sang Jang's personal and business credit cards.

78. **Defendant Chi-Won Jeon**

a. As described in Paragraph 51 above, defendant Chi Won Jeon, using the Chinese name Xianzi Luo and a corresponding 586 social security number, fraudulently obtained a driver's license in that name from the IDMV. Defendant Chi-Won Jeon, using the Chinese name Fengling Jin and a corresponding 586 social security number, fraudulently obtained a driver's license in that name from the IDMV.

b. Beginning in or about October 2007, defendant Chi Won Jeon, using the Chinese name Xianzi Luo, a corresponding 586 social security number, and the fraudulently obtained Illinois driver's license that she had obtained, applied for and received lines of credit from Citibank (three lines of credit) and credit cards from Macy's, Bloomingdale's, Citibank, Chase Bank, HSBC Bank, Neiman Marcus, Saks Fifth Avenue, and Target National Bank. Numerous charges were made on these credit cards that were not paid, resulting in a loss of approximately \$65,000.

c. In or about November 2008, defendant Chi-Won Jeon, using the Chinese name Fengling Jin, a corresponding 586 social security number, the fraudulently obtained Pennsylvania driver's license that she had obtained, and her actual address (as reflected on her New Jersey driver's license issued in her real name), applied for and received credit cards issued by Chase Bank, PNC Bank, Citibank, Macy's (Visa credit card and store credit), and Bloomingdale's.

d. According to records from Macy's, a Macy's store credit card account, in the name of Fengling Jin, was used to purchase the following items:

Date of Transaction	Amount	Item Purchased
January 3, 2009	\$870	diamond earrings
January 3, 2009	\$730	Louis Vutton item
January 8, 2009	\$9,077	diamonds
February 20, 2009	\$400	electronic gift cards
February 20, 2009	\$200	Chanel make up

e. According to records from Macy's, on or about on or about February 18, 2009, a check payment in the amount of \$1,319.21 was made against this account. On or about March 4, 2009, this payment was returned because of insufficient funds. The charges on this credit card were not paid, resulting in a loss of approximately \$15,000.

f. According to records from Macy's, on or about February 23, 2009, a charge, in the amount of approximately \$20, was made on the Macy's Visa credit card in the name of Fengling Jin. The listed merchant for this charge is 90 You & Me Corporation, a collusive merchant controlled by defendant Hyo-Il Song. This charge was a "test charge" to determine whether or not the credit card was still active so additional charges (i.e., "bust outs") could be made.

g. According to bank and credit card company records, multiple charges were made on the credit cards in the name of Fengling Jin. According to these records, these charges were not paid, resulting in a loss of approximately \$31,000.

h. On or about September 22, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Chi-Won Jeon. During this intercepted conversation, defendant Chi-Won Jeon stated, "I was referred by Stephanie [defendant Young-Hee Ju] so I called. I think I saw you once before. . . . Well, I wanted to go visit you today about doing a loan."

79. **Defendant Jung-Hyuck Seo**

a. As described in Paragraph 51 above, defendant Jung-Hyuck Seo, using the Chinese name Xiaoqin Zhang and a corresponding 586 social security numbers, fraudulently obtained an identification card in that name from the IDMV.

b. Beginning in or about January 2009, defendant Jung-Hyuck Seo, using the Chinese name Xiaoqin Zhang, a corresponding 586 social security number, and the fraudulently obtained Illinois identification card that he had obtained, applied for and received credit cards from Chase Bank, Bloomingdale's, Macy's, HSBC Bank/Best Buy, HSBC Bank, and PNC Bank.



c. Thereafter, these fraudulently obtained credit cards were used to make the following charges, among others:

Date of Charge	Credit Card	Amount	Description
February 20, 2009	PNC	\$7,000	convenience check
April 29, 2009	PNC	\$2,000	convenience check
May 24, 2009	Bloomingdale's	\$274	clothes
July 23, 2009	Macy's	\$896	clothes

These charge were not paid and others were not paid, resulting on a loss of approximately \$22,000.

d. Beginning in or about early 2008, an individual using the Chinese name Xiaoqin Zhang, an Illinois identification, and a corresponding 586 social security number, opened a personal checking account and a business checking account in the name of Erin's Skin Supply at Washington Mutual (now Chase Bank). According to records from the Erin's Skin Supply account, in December of 2009, the account had a balance of less than \$100. Thereafter, approximately nine checks, totaling approximately \$84,000 were drawn on this account to others. The bank did not release the funds. On the Xiaoqin Zhang personal account, approximately six checks, totaling approximately \$46,500 were drawn on this account. The bank did not release the funds. During this investigation, a law enforcement officer conducted surveillance near Cello Hair, located in Palisades Park, New Jersey and observed and video-recorded: (i) a sign for "Erin's Meridian Skincare" above the rear entrance of Cello Hair (which address was used on the bank records to open the Erin's Skim Supply business account); and (ii) defendant Jung-Hyuck Seo inside Cello Hair on numerous occasions, where he is employed as a hair stylist. In addition, defendant Sung-Sil Joh was also observed and video-recorded inside Cello Hair.

80. Defendant Jong-Kwan Hong

a. On or about September 9, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Jong-Kwan Hong. During this intercepted conversation, defendant Jong-Kwan Hong asked, "Do you have any good news", and defendant Sang-Hyun Park replied, "I gave you both ID and social number [sic]." "Yes, I have both. . . . And then I opened at both banks," replied defendant Jong-Kwan Hong. Defendant Sang-Hyun Park then directed defendant Jong-Kwan Hong to deposit money into the accounts and use the money [to create a transaction history to give the illusion that the account is legitimate].

b. On or about September 14, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Jong-Kwan Hong. During this intercepted conversation, defendant Jong-Kwan Hong asked about applying for and obtaining credit cards. Defendant Sang-Hyun Park replied, "I am working on the build up. Build up should be complete. . . . I will be the first one to get the conformation. Just wait, please." Defendant Jong-Kwan Hong complained, "It's been over two months," and defendant Sang-Hyun Park replied, "Lately, it takes about three months."

c. On or about September 18, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Jong-Kwan Hong. During this intercepted conversation, defendant Jong-Kwan Hong stated, "I got [the] Bank of America's check book." "Bring all of them together later when you come to see me," replied defendant Sang-Hyun Park. Defendant Jong-Kwan Hong then stated, "For now, I got the check books from both. And I got all the debit cards."

d. On or about October 23, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Jong-Kwan Hong. During this intercepted conversation, defendant Sang-Hyun Park stated, "They say yours [sic] will be finally finished by November 15." [a reference to the build up following credit associated with the Chinese alias he obtained from defendant Sang-Hyun Park]. Later during the conversation, defendant Jong-Kwan Hong asked, "And, have you started that about which President Na [a co-conspirator] talked, when I went to have a haircut." Defendant Sang-Hyun Park replied, "Now, I've begun the build up" Defendant Sang-Hyun Park stated that he just received a Nevada identification for [a co-conspirator].

e. On or about November 11, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Jong-Kwan Hong. During this intercepted conversation, defendant Jong-Kwan Hong stated that he received papers from two credit reporting agencies. Defendant Sang-Hyun Park explained that the papers related to the address verification [necessary for the credit build up to establish the veracity of the individual's credit history]. Defendant Sang-Hyun Park instructed defendant Jong-Kwan Hong to bring the documents to defendant Sang-Hyun Park. Later during the conversation, they agreed that defendant Jong-Kwan Hong would go to defendant Sang-Hyun Park's office on or about November 16, 2009.

f. On or about November 16, 2009, a law enforcement officer conducting surveillance near defendant Sang-Hyun Park's Bergen Turnpike Office observed and video recorded a silver Lexus, registered to female with the last same last name and address as defendant Jong-Kwan Hong, entering and exiting a parking adjacent to the Bergen Turnpike Office.

g. Beginning in or about December 2009, defendant Jong-Kwan Hong, using the Chinese name Dongshu Li and a corresponding 586 social security number, applied for and obtained six credit cards in the name of Dongshu Li. Numerous charges were made on each credit card but were not paid, resulting in a total loss of approximately \$9,600.

h. On or about December 21, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Jong-Kwan Hong. During this intercepted conversation, defendant Sang-Hyun Park instructed defendant Jong-Kwan Hong to go to defendant Sang-Hyun Park's office to begin applying for credit cards.

i. Later that day, according to records from Target National Bank, an application for a credit card was made in the name of Dongshu Li with a corresponding 586 social security number, a counterfeit Nevada driver's license, and a reported address in Westbury, New York belonging to defendant Jong-Kwan Hong. In addition, the phone number supplied on the application is the same telephone number that defendant Jong-Kwan Hong used to communicate with defendant Sang-Hyun Park over the First Park Facility. According to the Nevada Department of Motor Vehicles, the Nevada driver's license number listed on the application does not exist.

j. According to records from Macy's/Bloomingtondale Fraud Department, on or about April 7, 2010, a charge of \$60 was attempted but declined on a credit card issued in the name of Dongshu Li with a corresponding 586 social security number.

l. On or about April 8, 2010, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Jong-Kwan Hong. During this intercepted conversation, defendant Jong-Kwan Hong complained that he attempted to use a Bloomingdale's credit card to make a \$60 purchase, but the transaction was denied.

81. **Defendant In-Sook Lee**

a. As described in Paragraph 51 above, defendant In Sook Lee, using the Chinese name Ping Fang and a corresponding 586 social security number, fraudulently obtained an identification card in that name from the IDMV.

b. On or about February 23, 2009, while at the Broad Office, during a consensually recorded meeting (audio and video) with Cooperating Witness One, defendant Sang-Hyun Park was on the phone with a person referred to as "Young Woo." Based on records from a telephone company, this phone number is used by defendant Young-Woo Ji. During the conversation, in which only defendant Sang-Hyun Park's portion of the call is recorded (by Cooperating Witness One), defendant Park asked, "If [defendant Young-Woo Ji] had received a call from In-Sook [defendant In-Sook Lee] . . . . I told [her] to send all of them to you. When you receive them . . . . So I am telling you to help that kid [defendant In-Sook Lee] for that . . . . If the man calls you, make an effort to help with that kid's thing?"

c. According to records from the United States Postal Service, on or about September 15, 2009, an individual, using the name Ping Fang, a corresponding 586 social security number, and a genuinely issued Illinois driver's license in that name, established a post office box at a mail drop facility in Palisades Park, New Jersey. The telephone number listed on the application for the mail drop is the same telephone number defendant In-Sook Lee used to communicate with defendant Sang-Hyun Park over the First Park Facility, as described below.

d. On or about October 20, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant In-Sook Lee. During this intercepted conversation, defendant Sang-Hyun Park stated that he had spoken with defendant Young-Woo Ji, and they discussed moving her

address from a post office box to another address in anticipation of the completion of her credit build up. Defendant Sang-Hyun Park further stated, "And, also there was one I made before [for you], right? . . . . Have to do that quickly too, open the bank account."

e. On or about January 6, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant In-Sook Lee. During this intercepted conversation, defendant In-Sook Lee asked defendant Sang-Hyun Park for the name of the owner of Li Nails. Defendant Sang-Hyun Park replied Zhen Li, a male. [As described in Paragraph 51 above, defendant Sang-Hyun Park obtained a Illinois identification card using the Chinese name of Zhen Li and a corresponding 586 social security number. Defendant Sang-Hyun Park incorporated or caused to be incorporated Li Nails using the fraudulently obtained identity Zhen Li].

f. On or about January 6, 2010, over the Second Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Young-Woo Ji. During this intercepted phone call, defendant Young-Woo Ji stated, "Please have Hyun-Jin LNU [defendant Hyun-Jin LNU] make a deposit of \$500 into my account [later that day, during a subsequent conversation, defendant Young-Woo Ji identified this account as ZZ Entertainment]." Later during the conversation, defendant Sang-Hyun Park asked, "How is In Sook's thing going [defendant In-Sook Lee]?" Defendant Young-Woo Ji replied, "In Sook's?. . . . I have not run In Sook's, but her's [sic] will be done well. . . . It will be done . . . soon. . . . So please don't give me stress with In Sook's."

g. On or about April 24, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant In-Sook Lee. During this intercepted conversation, defendant In-Sook Lee stated, "Big Sister Hyun-Jin LNU is not answering the phone . . . I have to work on Monday of next week. Can I come over next Tuesday [April 27, 2010]." Defendant Sang-Hyun Park replied, "I will talk to them."

h. According to records from GE Money Bank/Wal-Mart, on or about or about April 27, 2010, an individual using the Chinese name Ping Fang, the fraudulently obtained Illinois identification, and a corresponding 586 social security number, applied for and received a credit card from GE Money Bank/Wal-Mart. On or about May 11, 2010, this credit card was charged by Cocoxu in the amount of approximately \$710.62. This charge,

together with other charges, was not paid, resulting in a total loss of approximately \$1,000.

i. On or about May 25, 2010, according to records from TD Bank and photographs from the bank's surveillance video, defendant In-Sook Lee entered a bank branch in Bergen County, New Jersey and opened a checking account in the name of Ping Fang, a Chinese name, using an Illinois driver's license in that name, and a corresponding 586 social security number (which social security number was not issued to defendant In-Sook Lee by the United States). Furthermore, photographs from the bank's surveillance video reveals that defendant Osung Kwon accompanied defendant In-Sook Lee into the bank. After opening this account, defendant In-Sook Lee applied for and received a TD Bank credit card in the name of Ping Fang with a corresponding 586 social security number.

## 82. Defendant Sung-Rok Joh

a. As described in Paragraph 51 above, defendant Sung-Rok Joh, using the Chinese name Zhang Li and a corresponding 586 social security number, fraudulently obtained an identification card in that name from the IDMV.

b. Beginning in or about April 2009, according to records from Macy's, GE Money Bank/Brooks Brothers, GE Money Bank/PC Richard, Sears, Home Depot, and HSBC/Saks Fifth Avenue, an individual using the Chinese name Zhang Li, a corresponding 586 social security number, and a fraudulently obtained Illinois identification card that he had obtained, applied for and received several credit cards in the name of Zhang Li. Based on this investigation, Your Affiant believes that defendant Sung-Rok Joh is the individual who obtained this credit card using the Chinese name Zhang Li with the corresponding 586 social security number. Numerous charges were made on these credit cards that were not paid, resulting in a loss of approximately \$24,000.

## 83. Defendant Jung-Bong Lee

a. As described in Paragraph 51 above, defendant Jung Bong Lee, using the Chinese name Hong Guo Cui and a corresponding 586 social security number, fraudulently obtained an identification card and a driver's license in that name from the IDMV. Defendant Jung Bong Lee, using the Chinese name Wei Xiang Lu and a corresponding 586 social security number, fraudulently obtained a driver's license in that name from the PennDOT.

b. On or about September 17, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Jung-Bong Lee. During this intercepted conversation, defendant Jung-Bong Lee stated, "There was no call about the build up." Defendant Sang-Hyun Park responded, "It seems that the build up isn't done yet." Defendant Sang-Hyun Park asked if defendant Jung-Bong Lee had opened bank accounts, and defendant Jung-Bong Lee replied that he opened a Bank of America account. Later during this conversation, defendant Jung-Bong Lee stated, "That's why I'm now . . . the reason for applying for a BOA security card is that there's the matter with doing the second round . . . ." Defendant Jung-Bong Lee stated that he would be satisfied if he could obtain approximately \$30,000 from the bank.

c. According to records from various credit card companies and a credit reporting agency, in or about July 2009, defendant Jung-Bong Lee, using the Chinese name Wei Xiang Lu, a corresponding 586 social security number, the fraudulently obtained Pennsylvania driver's license (with photograph) that he obtained, a Citibank credit card in the name of Wei Xiang Lu, and an address used by him, applied for and obtained a Capital One credit card. In addition, during this period, defendant Jung-Bong Lee, using the same fraudulently obtained Chinese identity, applied for and obtained approximately eleven other credit cards from Citibank, Bloomingdale's, Macy's, HSBC Bank, HSBC Bank/Nieman Marcus, and PNC Bank, among others. The following table sets forth some of the fraudulent charges made on credit cards obtained in the name of Wei Xiang Lu, among others:

Date	Type of Credit Card	Amount	Description
May 21, 2009	Citibank	\$940	Charge through a co-conspirator-financial consulting service ( <u>i.e.</u> , "kkang")
August 7, 2009	HSBC Bank/Nieman Marcus	\$990	Gucci handbag
August 7, 2009	HSBC Bank/Nieman Marcus	\$420	Cristalle Eau Verte Perform

d. These charges and other were made on these credit cards obtained in the name of Wei Xiang Lu. These charges were not paid, resulting in loss of approximately \$44,000.

e. According to records from various credit card companies and a credit reporting agency, beginning in or about February 2009, defendant Jung-Bong Lee, using the Chinese name Hong Guo Cui, a corresponding 586 social security number, and the fraudulently obtained Illinois driver's license that he had obtained, applied for and obtained credit cards from Chase Bank, Macy's, and HSBC Bank/Saks Fifth Avenue and other credit card companies. Based on this investigation, Your Affiant believes that defendant Jung-Bong Lee is the individual who obtained these credit cards using the Chinese name Hong Guo Cui with a corresponding 586 social security number.

f. The following table sets forth some of the fraudulent charges made on credit cards obtained in the name of Hong Guo Cui, among others:

Date	Type of Credit Card	Amount	Description
April 22, 2009	Chase Bank	\$1,250	Wooden Furs
May 18, 2009	HSBC Bank/Saks Fifth Avenue	\$4,000	Polo Ralph Lauren
May 26, 2009	HSBC Bank/Saks Fifth Avenue	\$11,122	Cartier Watch
May 27, 2009	HSBC Bank/Saks Fifth Avenue	\$716	Louis Vuitton leather goods
May 27, 2009	HSBC Bank/Saks Fifth Avenue	\$835	Gucci fashion shoes

g. These charges and other were made on these credit cards obtained in the name of Hong Guo Cui. These charges were not paid, resulting in loss of approximately \$55,000.



84. Defendant Hye-Won Jung

a. On or about September 8, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Hye-Won Jung. During this intercepted conversation, defendant Hye-Won Jung asked about a passport that arrived. Defendant Sang-Hyun Park responded, "Your passport? [I/we] need to get it ready. Build up isn't complete yet. First, need to open bank account and then do it. . . . Let me do the work here [first] and [we] can do it one at a time, okay?" Defendant Hye-Won Jung then asked, "[W]e're not doing the car?" Defendant Sang-Hyun Park replied, "What about the car? Need to buy a car but [you] can't buy it in your name because your credit fell to 500. . . . You can't do anything with your credit." They agreed to meet later that night.

b. On or about September 15, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Hye-Won Jung. During this intercepted conversation, defendant Sang-Hyun Park asked, "Did you hear from Hyun-Jin LNU [defendant Hyun-Jin LNU]? The card is missing. . . . I instructed Hyun-Jin LNU to put up the Chinese name on the mailbox on her way home." Defendant Hye-Won Jung replied, "Well, all the mail did come." Later during the conversation, defendant Sang-Hyun Park instructed defendant Hye-Won Jung to "go to the bank tomorrow . . . . You need to re-apply for the debit card tomorrow. Wait, Hyun-Jin LNU already applied so you only have to pick [it] up. Also, one more. Bring all the money, stock and cash."

c. On or about September 24, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Hye-Won Jung using a phone number from Li Nail, d/b/a "Nails Plus," in Hopatcong, New Jersey. During this intercepted conversation, defendant Sang-Hyun Park asked if a call from Citibank was received at the store looking for Mingyu Jin [A Chinese name with a corresponding 586 social security number]. According to a credit reporting agency, Mingyu Jin was reportedly employed by Nail Plus. Moreover, numerous credit cards were obtained in this name and corresponding social security number. In total, approximately \$16,000 in loss is associated with these credit cards]. Defendant Hye-Won Jung replied that no such call was received. Defendant Sang-Hyun Park stated, "[W]hen [the call] comes say [Mingyu Jin is] out regardless and give me a call and get the number. You know what I am saying?. . . . You know the name [Mingyu Jin], if they ask [if that person] works, tell them correct [*i.e.*, yes] that person works [at the store] and . . . ask them to leave a message. . . .

[d]on't make a mistake." Defendant Hye-Won Jung replied, "I got it." Defendant Sang-Hyun Park again reminded defendant Hye-Won Jung "[s]o [if] a call for [Mingyu Jin] comes, answer it well. . . . Got it?" Defendant Hye-Won Jung replied, "It's a third time [sic] telling me the same thing." Defendant Sang-Hyun Park continued: "So, tell [the] employee[s] [at the salon], you don't have to say who [Mingyu Jin] is but if they look for that person, educate the [employees] to say [Mingyu Jin is] not there. . . ." Later during the conversation, the following discussion ensued:

Park: Yeah, your passport you, did with?  
Jung: Is that all prepared?  
Park: No, a build up is still being done but open an account in advance and have to use the money coming and going. . . .

d. On or about June 2, 2010, according to records from Valley National Bank and photographs from the bank's surveillance video, defendant Hye-Won Jung entered a bank branch in Bergen County, New Jersey and opened an account in the name of Meihong He, a Chinese name, using a counterfeit California driver's license and a corresponding 586 social security number (which social security number was not issued to defendant Hye-Won Jung by the United States). Furthermore, photographs from the bank's surveillance video reveals that defendant Osung Kwon accompanied defendant Hye-Won Jung into the bank. On the application to open the account, defendant Hye-Won Jung, using the name Meihong He, listed her employment as Moja Trading, a company controlled by defendant Sang-Hyun Park.

e. On or about June 23, 2010, according to records from Valley National Bank and photographs from the bank's surveillance video, defendant Joong-Hyun Jung entered a Valley National Bank in Bergen County, New Jersey and deposited a check in the amount of \$3,500, drawn on the account of "Cheng Yu Ma" [a Chinese identity with a corresponding 586 social security number], into the account in the name of Meihong He [the Chinese identity used by defendant Hye-Won Jung]. This check was returned for insufficient funds.

f. From in or about March 2010 through in or about July 2010, defendant Hye-Won Jung, using the identity Meihong He and a corresponding 586 social security number, obtained approximately ten credit cards and lines of credit from various credit card companies and retail stores. These charges were not paid, resulting in a total loss of approximately \$8,000.

85. Defendants Son-Hee Chong and In-Suk Joo

a. On or about September 14, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant In-Suk Joo. During this intercepted conversation, defendant In-Suk Joo stated that she had previously gone to his office and asked about "the Chinese credit." Defendant In-Suk Joo further asked, "I told my friend that I needed money. How much is it?" Defendant Sang-Hyun Park replied, "Which one exactly? Did you call about the driver's license?" Defendant In-Suk Joo stated that she wanted the driver's license and "the Chinese credit." Defendant Sang-Hyun Park advised defendant In-Suk Joo that "[t]otally, it costs \$7,000."

b. On or about September 15, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant In-Suk Joo. During this intercepted conversation, defendant In-Suk Joo stated, "I came over yesterday, do you remember? Three ladies? . . . Can we meet at 8:00 this evening." Defendant Sang-Hyun Park agreed to meet her and asked if everything was prepared. Defendant In-Suk Joo stated, "Yes, I will do it."

c. After the call referred to in Paragraph 29b above, on or about September 15, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Son-Hee Chong. During this intercepted conversation, defendant Son-Hee Chong stated, "You met two others earlier and you met me yesterday for the first time, right?" Defendant Sang-Hyun Park acknowledged meeting her. Defendant Son-Hee Chong then confirmed that she and the two others would meet defendant Sang-Hyun Park later that night.

d. On or about September 15, 2009, a law enforcement officer was conducting surveillance near the Broad Office. During this surveillance, the law enforcement officer observed three older Korean females exit defendant Sang-Hyun Park's building and enter a black Lexus.

e. On or about September 15, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Dong-Won Kim. During this intercepted conversation, defendant Sang-Hyun Park asked if defendant Dong-Won Kim found "out about the social." Defendant Dong-Won Kim replied that he was waiting for a phone call. Defendant Sang-Hyun Park then stated that he needed four social security cards. Defendant Dong-Won Kim asked, "[w]hat birth

year?," and defendant Sang-Hyun Park stated that it should be for a female of about 50 years of age. Sang-Hyun Park asked defendant Dong-Won Kim to rush the request.

f. On or about September 16, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Dong-Won Kim. During this intercepted conversation, defendant Dong-Won Kim stated that he had no social security cards for birth years in the 1960s. Defendant Sang-Hyun Park stated, "These people are too old to pass as the 7s [individuals born in the 1970s]. . . . [T]hese are middle aged woman, almost in their late 50s. . . . It's a nail shop lady through an introduction from someone. . . . I got all the money yesterday." Defendant Son-Hee Chong was observed by a law enforcement officer operating a nail saloon.

g. On or about September 17, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant In-Suk Joo. During this intercepted conversation, defendant In-Suk Joo identified herself as "Mrs. Joo who went there before." Defendant Sang-Hyun Park asked, "Why are you not bringing the picture, picture, picture?" Defendant In-Suk Joo said that she had to take the picture. Defendant Sang-Hyun Park stressed that she needed to bring him the picture immediately so that he "could work on the ID." Defendant In-Suk Joo asked if he was able to obtain a social security number corresponding to her age. Defendant Sang-Hyun Park replied, "I can't give the exact one . . . . the only way is to make it younger, born in the 60s." [see Paragraphs 85n, 85o, and 85p below relating to a 586 social security number used by defendant In-Suk Joo].

h. On or about September 23, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant In-Suk Joo. During this intercepted conversation, defendant In-Suk Joo stated, "Our ID case . . . did it get filed? Don't you need the address?" Defendant Sang-Hyun Park replied, "The address is not included . . . . The ID is from another state. Another state. . . . When it comes, there is a lot to prepare."

i. On or about September 30, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant In-Suk Joo. During this intercepted conversation, they discussed a remaining payment of approximately \$9,000.

j. On or about September 30, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Son-Hee Chong. During this intercepted conversation, defendant Son-Hee Chong confirmed giving a photograph to defendant Sang-Hyun Park. Defendant Sang-Hyun Park stated, "The ID should come this weekend. . . . When will you pay the balance." "I already gave you for the two. . . . Gave you \$14,000," defendant Son-Hee Chong replied. Defendant Sang-Hyun Park stated, "You gave me some out of \$21,000 that time. And you said you didn't have the rest and ask for my understanding. . . ." She replied, "I gave you \$12,000 that time," and defendant Sang-Hyun Park replied, "Yes, you gave me \$12,000." Later during the conversation, defendant Sang-Hyun Park stated, "I requested [the] ID on [September 22, 2009] for Chong Son-Hee [defendant Son-Hee Chong]." Defendant Sang-Hyun Park advised her that it would take approximately two to three months to complete the build up, and he would "make Nevada driver's license."

k. On or about October 16, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Dong-Won Kim. During the conversation, Sang-Hyun Park ordered three social security cards from defendant Dong-Won Kim. Defendant Sang-Hyun Park stated, "Yes, three has been [sic] confirmed. [Born 19]70s, males . . . . Doesn't matter if [born in] 75, 76, 72. . . ."

l. On or about October 19, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant In-Suk Joo. During this intercepted conversation, defendant Sang-Hyun Park stated, " I called you because . . . . I was trying to do build up but the address . . . . I realized I hadn't received your address. . . . You can use your home address. I doesn't matter." Thereafter, defendant In-Suk Joo provided her actual home address in Clark, New Jersey to defendant Sang-Hyun Park over the phone. The address she provided to defendant Sang-Hyun Park corresponding the address on her genuinely issued New Jersey driver's license.

m. On or about November 9, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant In-Suk Joo. During this intercepted conversation, defendant In-Suk Joo asked for a status, and defendant Sang-Hyun Park replied, "Build up is in process so you need to wait . . . . Which person were you among the three?" She replied, "In-Suk Joo, Joo! . . . . Chong [defendant Son-Hee Chong] [came before me]." Defendant Sang-Hyun Park advised her to be prepared to open bank accounts in the following weeks.

n. In or about April 2010, according to records from Chase Bank, Citibank, and a credit reporting agency, an individual using the Chinese name Danhua Wang, a corresponding 586 social security card (related to a 1961 birth year), a counterfeit Nevada driver's license, and defendant In-Suk Joo's address in Clark, New Jersey, applied for and received credit cards from Chase Bank, Citibank, Bloomingdale's, and GE Money Bank/Walmart. Based on this investigation, Your Affiant believes that defendant In-Suk Joo is the individual who obtained these credit cards using the Chinese name Danhua Wang with the corresponding 586 social security number.

o. The following table sets forth some of the fraudulent charges made on credit cards obtained in the name of Danhua Wang ("kkang"):

Date	Type of Credit Card	Amount	Description
May 4, 2010	Chase	\$520	Charge through Li Nails Plus
May 6, 2010	Chase	\$3,659	Charge through Cocoxu

p. Numerous charges were made on credit cards issued in the name of Danhua Wang that were not paid, resulting in a loss of approximately \$10,000.

q. On or about June 28, 2010, according to records from Valley National Bank and photographs from the bank's surveillance video, defendant Son-Hee Chong entered a Valley National Bank in Bergen County and opened an account in the name of Mingshun Yuan, a Chinese name, a corresponding 586 social security number (which social security number was not issued to defendant Son-Hee Chong by the United States), a counterfeit Nevada driver's license, (a copy of which was retained by the bank and bears a photograph of defendant Son-Hee Chong), and a corresponding 586 social security number. Furthermore, photographs from the bank's surveillance video reveals that defendant Osung Kwon accompanied defendant Son-Hee Chong into the bank. On the application to open the account, defendant Son-Hee Chong, using the name Mingshun Yuan, listed her actual home address in Palisades Park, New Jersey (where a law enforcement officer, while conducting surveillance, observed defendant Son-Hee Chong enter and exit). The bank, however, immediately closed the account.

86. Defendant Byung Jang

a. On or about September 21, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Byung Jang. During this intercepted conversation, the following discussion ensued:

Park: Hello?  
Jang: Hello?  
Park: Yes, big brother, it's me.  
Jang: Yes, you called.  
Park: Didn't [you] have a 586 [social security card] in the past?  
Jang: 586? I did.  
Park: But that is now, is it still alive in the bank?  
Jang: That, I don't know if it's still alive in the bank or not. There's no ID, no ID.  
Park: No ID?  
Jang: Yes. No ID for 586.  
Park: So, you did it without ID or any?  
Jang: There wasn't any, at the time, [I] made a passport and gave it to [a co-conspirator] and finished. . . . [Co-conspirator] and I went there to make a license. . . . I had it and then [I] [threw it away].  
Park: What was it that [you] made licenses at that time?  
Jang: At that time, when we went, [I] passed the [driver] license but when [I] had to go for a driving test, [I] didn't go but instead [I] just got \$30,000 or something at the bank and quit. Extracted a credit card. And then [I] withdrew without doing anything. It's probably still alive in Wachovia and such but the problem is the passport, because there's no passport, there's no ID.  
Park: You didn't have a copy of ID, anything at that time?  
Jang: Right, I gave them all without making copies.  
Park: And, you made a license or something with me last time, lousy one [counterfeit].  
Jang: That, that was a TD Bank.  
Park: What was it?  
Jang: TD Bank, no that, that's my original, that is. That's of course a [fake?], we made it to bust out on a Citibank. . . . There's no ID for that, either.

Park: There's no ID, you said?  
Jang: Yes, how can a lousy one go around? That I made it through [Co-conspirator] for \$800, . . . did it but didn't work out at the end  
Park: Ah, so?  
Jang: Yeah. So, leave it or use it with a bill later, you have to think about it later. After some time passes. There's a loan I got from Citibank but it failed while trying to do.  
Park: So, the problem is that there are no IDs at all, right?

\* \* \* \*

Park: 586. . . .  
Jang: Yes, same with 586 and other things are the same and I didn't request lots of checks, that sort of things do exist.

\* \* \* \*

Park: Did you have that lousy ID [counterfeit] that you made?  
Jang: Which one?  
Park: The lousy one you made at that time?  
Jang: The lousy one, I cut it off.  
Park: You cut it off.  
Jang: Yeah, if I keep it, that's anyway, it's too lousy and why would I keep it when it's too inadequate. It's completely inadequate.

\* \* \* \*

Park: What was it about, that passport was made for?  
Jang: Citibank, Citibank.  
Park: The name, the name. What was the name?  
Jang: An that's P, Byung Jang but it's P, Pyung Jang.  
Park: Ah, the one with a Korean name?  
Jang: Yeah, it's Pyung Jang. It starts with 137 because it's mine. Ah, that came from Los Angeles, too.  
Park: What came from LA?  
Jang: That TD Bank thing.  
Park: There was only TD Bank one with that name, and not any other account?



Jang: Right, I didn't even make other accounts. I had a few cards, Capitol, Bank of America and a few.

b. Beginning in or about November 2008, defendant Byung Jang, using the Chinese name Xue Hui Shi and a corresponding 586 social security number, applied for and received credit cards issued by Bank of America, Chase Bank, HSBC Saks Fifth Avenue, PNC Bank, and Citibank. According to records Bank of America, HSBC Saks Fifth Avenue, and PNC Bank, defendant Byung Jang applied for these credit cards and listed his actual Fort Lee, New Jersey address. Furthermore, according to records from Toyota Motor Credit Corporation, on or about September 8, 2009, defendant Byung Jang applied for and received a car loan in Bergen County, New Jersey, in the approximate amount of \$22,500, from Toyota Motor Credit Corporation to purchase a black, 2010 Toyota Camry. On the application, defendant Byung Jang represented he was the owner of Yuri Beauty Salon, Closter, New Jersey with a reported income of \$5,000 per month.

c. According to records from PNC Bank, a PNC Bank Visa credit card, in the name of Xue Hui Shi, was charged through "Yuri Hair Salon." These charges, among others, were not paid, resulting in a loss of approximately \$9,400.

87. **Defendant Amy Yang** (see Paragraphs 51 and 72 above).

88. **Defendants Song-Ja Park and Min-Jun Kwon**

a. On or about January 23, 2010, over the Second Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Min-Jun Kwon. During the intercepted conversation, the following discussion ensued, in substance and in part:

Kwon: Yes, president.  
Park: I heard everything went well.  
Kwon: Yes. I just picked up the mails.  
Park: Yes.  
Kwon: The Target card [with] the same address.  
Park: It came?  
Kwon: Yes. The address and.  
Park: It came with the card, right?  
Kwon: Yes, yes. It came with the card.  
Park: . . . Then please bring us the Macy [card] and the temporary card, so we could find out how much it/they worth over the phone on Monday.

Kwon: Brother Dong-il [defendant Dong-Il Kim] has it.  
 Park: Huh?  
 Kwon: Brother Dong-il has it.  
 Park: Dong-il? He said he doesn't have it.  
 Kwon: Huh?  
 Park: Ask your mother [defendant Song-Ja Park]. The temporary card, one that got approved.  
 Kwon: Which card? [My mother] told me she gave it to brother Dong-il [defendant Dong-Il Kim].  
 Park: Macy's. . . . Dong-il says he never got it. . . . Okay, see if you have it. Ask your mother [Song-Ja Park].

b. On or about January 23, 2010, over the Second Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Min-Jun Kwon. During the intercepted conversation, the following discussion ensued, in substance and in part:

Park: Yes, Kwon.  
 Kwon: Yes, but we don't have it here.  
 Park: What do mean? Just a moment, I will let you talk to Dong-il [defendant Dong-Il Kim].  
 Kwon: Yes.  
 Park: [To defendant Dong-Il Kim]. He said he doesn't have it.  
 Kim: Hello?  
 Kwon: Yes, big brother.  
 Kim: Ask [defendant Song-Ja Park] to look inside the shopping bag, again I, the mailing. . . .  
 Kwon: Yes, yes.  
 Kim: I just brought [the mail] with me. . . . Two IDs and address for verification...

c. In or about January 2010, Target National Bank issued a credit card in the name of Run Hong Liu.

d. In or about January 2010, Macy's issued a credit card in the name of Run Hong Liu, resulting in a loss of approximately \$3,000.

e. In or about January 2010, Bloomingdale's issued a credit card in the name of Run Hong Liu, resulting in a loss of approximately \$3,000.

f. On or about February 4, 2010, according to records from Chase Manhattan Bank and photographs from the bank's surveillance video and law enforcement surveillance, defendant Song-Ja Park entered a bank branch in Bergen County, New Jersey and opened a checking account in the name of Run Hong Liu, a Chinese name, using a counterfeit California driver's license, and a corresponding 586 social security number (which social security number was not issued to defendant Song-Ja Park by the United States). In addition to opening this account, defendant Song-Ja Park also obtained a debit card in the name of Run Hong Liu from this bank. Photographs from the bank's surveillance video reveals that defendant Dong-Il Kim accompanied defendant Song-Ja Park into the bank.

g. On or about February 4, 2010, federal agents were conducting surveillance near defendant Sang-Hyun Park's Bergen Turnpike Office. These federal agents observed a car registered to defendant Min-Jun Kwon depart the Bergen Turnpike Office. The federal agents followed this car to the Chase Manhattan Bank. Thereafter, this surveillance team took a series of photographs showing defendants Dong-Il Kim and Song-Ja Park departing the bank and entering defendant Min-Jun Kwon's car.

h. In or about March 2010, Citibank issued a credit card in the name of Run Hong Liu, resulting in a loss of approximately \$2,000.

i. On or about April 2, 2010, a charge, in the approximate amount of \$20, was made on a debit card issued to the Run Hong Liu at Cello Hair, a company owned and operated by defendant Sung-Sil Joh.

j. In or about April 2010, Chase Bank issued a credit card in the name of Run Hong Liu. On or about April 20, 2010, a charge, in the approximate amount of \$3,735, was made on this credit card at a liquor store in Bergen County, New Jersey. The charges on this card were not paid, resulting in a loss of approximately \$4,000.

89. Defendant Hag-Sang Jang

a. On or about January 13, 2010, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Jong-Hoon Kim. During this intercepted conversation, defendant Sang-Hyun Park stated that he received a call from a prospective customer who wanted to bust out his credit cards. Defendant Sang-Hyun Park provided the prospective customer's last name, telephone number, and location of residence to defendant Jong-Hoon Kim and asked him to "give [the prospective customer] a consultation?" Defendant Sang-Hyun Park stated that the customer had at least six credit cards and "it seems like his remaining limit is more than enough[,] [and] [h]e wants me to get the readjustment, and he wants me to take out the cash from them. . . . If he wants to get the readjustment, that means, he said he can't make payments at all. . . . So he called me to take the cash out." Based on this information, together with other information, Your Affiant believes that defendant Sang-Hyun Park was referring to defendant Hag-Sang Jang.

b. On or about January 14, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Jong-Hoon Kim. During this intercepted conversation, defendant Sang-Hyun Park asked if he had spoken with the "old man" [defendant Hag-Sang Jang]. Defendant Jong-Hoon Kim replied, "I just did. Gosh. I had to talk to him for two hours." Defendant Jong-Hoon Kim added, "There is a good amount" [of credit remaining on the credit cards]. Defendant Jong-Hoon Kim also advised defendant Sang-Hyun Park that defendant Hag-Sang Jang sought a consultation from another local broker in the area.

c. On or about January 16, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Jong-Hoon Kim. During this intercepted conversation, defendant Jong-Hoon Kim stated, "The gentlemen [defendant Hag-Sang Jang] came by my office here. It looks like available cash for the first round amounts anywhere from \$20,000 to \$23,000. . . . If you are okay with me bringing him here, we can go do the first round now. And the remaining job can be done in my office. . . . Defendant Sang-Hyun Park replied, "Okay."

d. On or about January 16, 2010, a law enforcement officer was conducting surveillance near defendant Jong-Hoon Kim's office in Ridgefield, New Jersey. During this surveillance, the law enforcement officer observed and video recorded a car, registered to defendant Hag-Sang Jang, in a parking lot adjacent to Jong-Hoon Kim's office building.

Thereafter, a car, registered to a company affiliated with defendant Jong-Hoon Kim, was observed leaving the building, and defendants Jong-Hoon Kim and Hag-Sang Jang were observed in this car. The law enforcement officer followed this car, containing the two aforementioned defendants, to the Bergen Turnpike Office.

e. On or about January 16, 2010, at approximately 11:12 a.m., over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Jong-Hoon Kim. During this intercepted conversation, defendant Jong-Hoon Kim stated, "Open the door, please."

f. On or about January 16, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Jong-Hoon Kim. During this intercepted conversation, defendant Sang-Hyun Park asked, "So how much worth did you buy?" Defendant Jong-Hoon Kim replied that he purchased \$2,500 worth of an unidentified product.

g. On or about January 16, 2010, the following credit card charges were made on credit cards issued to defendant Hag-Sang Jang or his business, H and S Construction:

Credit Card	Merchant	Approximate Amount
Visa (company)	Red Coco Int'l	\$3,000
Visa (company)	New M and K Global	\$3,210
Visa (company)	153 Samsung DC	\$1,500
Bank of America (personal)	Li Nails Plus	\$3,389
US Bank#1 (personal)	Liaison Inc. [a company allegedly headquartered in New York]	\$3,450
US Bank#2 (personal)	The Shop at Riverside, Hackensack, New Jersey	\$3,017
US Bank#2 (personal)	Saks Fifth Avenue, Hackensack, New Jersey	\$1,100

h. On or about January 28, 2010, according to records from Bank of America and photographs from the bank's surveillance video, defendant Hyun-Jin LNU entered a bank branch in Bergen County, New Jersey and made a payment in the form of a check to the Bank of America credit card (personal) belonging to defendant Hag S. Jang in the amount of \$8,700. This check was drawn on the Citibank account of Cheng Yu Ma [a Chinese name with a corresponding 586 social security number]. This check was returned for insufficient funds.

i. According to PNC Bank, the charges on credit cards issued to defendant were not paid, resulting in a loss of approximately \$23,000.

j. According to U.S. Bank, the charges on credit cards issued to defendant were not paid, resulting in a loss of approximately \$23,000.

90. **Defendant Jung-Sook Ko**

a. As described in Paragraph 51 above, defendant Jung Sook Ko, using the Chinese name Haishun Jin and a corresponding 586 social security number, fraudulently obtained an identification card and a driver's license in that name from the IDMV.

b. On or about January 8, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Jung-Sook Ko. During this intercepted conversation, defendant Jung-Sook Ko asked, "Isn't time to do mine now?" Defendant Sang-Hyun Park replied, Yes, I should. I am too busy these days." Defendant Jung-Sook Ko replied, "Now it has been more than one year. . . . Please bear that in mind. And there are lots of mail [sic] for Big Brother [defendant Myung-Kyun Ko, a/k/a "Longnan Cui," is defendant Jung-Sook Ko's brother] so give me a call. I will [give the mail to you]."

c. Beginning in about February 2010, according to records from Macy's, Bloomingdale's, Saks Fifth Avenue, Nordstrom, Citibank, Chase, Bank of America, and HSBC Bank, defendant Jung-Sook Ko, using the Chinese name Haishun Jin, a corresponding 586 social security number, and the fraudulently obtained Illinois driver's license that she had obtained, applied for and received approximately eight credit cards. Numerous charges were made on these credit cards that were not paid, resulting in a loss of approximately \$18,000.

d. On or about March 17, 2010, according to records from Valley National Bank and a photograph from the bank's surveillance video, defendants Hyun-Jin LNU and Jung-Sook Ko entered a branch in Fort Lee, New Jersey, and opened an account in the name of Haishun Jin with a corresponding 586 social security number.

91. **Defendant Myung-Kyun Ko**

a. As described in Paragraph 51 above, defendant Myung-Kyun Ko, using the Chinese name Longnan Cui and a corresponding 586 social security number, fraudulently obtained an identification card in that name from the IDMV.

b. Beginning in or about September 2008, Myung-Kyun Ko, using the Chinese name Longnan Cui, a corresponding 586 social security number, the fraudulently obtained Illinois identification card that he obtained, and an address belonging to defendant Myung-Kyun Ko, applied for and obtained credit cards from Chase Bank, and Macy's and other credit card companies.

c. The following table sets forth some of the fraudulent charges made on credit cards obtained in the name of Longnan Cui, among others:

Date	Type of Credit Card	Amount	Description
October 16, 2008	Chase	\$2,780	Charge through Ameth Thread (a company controlled by defendant Sang-Hyun Park)
May 14, 2009	Bank of America	\$4,780	Charge through ZI Int'l (a company controlled a co-conspirator)
May 16, 2009	Chase	\$3,693	Saks Fifth Avenue for merchandise
May 16, 2009	Chase	\$1,000	Abercrombie and Fitch
May 18, 2009	Bank of America	\$4,810	Charge through For Your Joy (a company controlled by FNU LNU#1, a/k/a "Mr. Choi" and "Xijun Gu")

d. The above charges and others were made on these credit cards but were not paid, resulting in a loss of approximately \$90,000.

92. **Defendant Yoon-Hee Park**

a. As described in Paragraph 51 above, defendant Yoon-Hee Park, using the Chinese name Zhangqi Zhang and a corresponding 586 social security number, fraudulently obtained an identification card in that name from the IDMV. He also fraudulently obtained an identification card in the name of Xiaofang Zhu from IDMV.

b. Beginning in or about June 2007, defendant Yoon-Hee Park, using the Chinese name Zhangqi Zhang, a corresponding 586 social security number, and the fraudulently obtained Illinois identification card that he had obtained, applied for and obtain a credit card from Best Buy. In addition, defendant Yoon-Hee Park, using the same Chinese name and 586 social security number, applied for and obtained credit cards from Chase (three), Citibank (five lines of credit), and Macy's. Numerous charges were made on these credit cards that were not paid, resulting in a total loss of approximately \$86,000.

c. On or about February 24, 2010, New York, defendants Seung-Ho Noh and Yoon-Hee Park entered a Citibank branch in Nassau County, New York. After they entered the bank, defendant Yoon-Hee Park, accompanied by defendant Seung-Ho Noh, attempted to open a business checking account in the name of "Yunny Enterprise" with an address corresponding to Sunny Enterprise, a store front located in Flushing, New York which business is used as a front to bust out credit cards. To open this business account, defendant Yoon-Hee Park provided the bank with a counterfeit New York State driver's license and social security card. While defendant Yoon-Hee Park was completing the forms to open the account, the bank contacted law enforcement.

d. Defendant Yoon-Hee Park, after being advised of his Miranda rights, told the police officers, in substance and in part, he purchased a driver's license from a "Chinese guy" for approximately \$500.

e. After obtaining defendant Seung-Ho Noh's consent, police officers his searched his car and seized to following items: (1) two checkbooks in the name of C.S.H. with an address in Ridgefield, New Jersey; (2) a fraudulently obtained Illinois driver's license in the name C.M.S., which name corresponds to a 586 social security number; (3) a MasterCard credit card in the



name of C.M.S.; (4) a genuinely issued New Jersey driver's license belonging to defendant Hag-Sang Jang; (5) an application form containing defendant Hag-Sang Jang's personal information, including his address in Palisades Park, New Jersey, date of birth, and business information, specifically, KNC Trading, Inc. with an address in Oakland Gardens, New York, and a tax identification number with the last four digits 4064; (6) a genuinely issued New York driver's license in the name of B.H.L. with a corresponding genuinely issued social security card in the same name; (7) an Illinois driver's license in the name of Y.W.; and (8) a notebook containing numerous handwritten entries pertaining to names with corresponding 586 social security numbers, addresses, bank account numbers, email address and passwords.

f. In addition to the items seized above, defendant Seung-Ho Noh, after being advised of his Miranda rights, made the following statements, in substance and in part, to the police officers: (1) the notebook [see Paragraph 37e above] belonged to him; and (2) he used checks from the checkbooks in the name of C.S.H. to issue checks to himself, and he knew that the account did not belong to him.

g. On or about April 27, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Seung-Ho Noh. During this intercepted conversation, they discussed defendant Seung-Ho Noh's arrest. The following ensued, in substance and in part:

Park: Yes.  
Noh: Hello?  
Park: Yes.  
Noh: Yes, eh. How are you? This is Mr. Noh. . .  
. It's Mr. Noh. Ha ha, you forgot, forgot my  
last name. Ha ha ha ha.

\* \* \* \*

Park: At that time, I heard the rumor, something  
bad happened to you.  
Noh: Ah. I just went together to open a bank  
account.  
Park: What happened actually?  
Noh: Ah. Someone I knew. I wasn't really close  
with him but I wanted to open and *do some*  
[sic] *check job*. (emphasis added). So we  
went to open some bank accounts.  
Park: Yeah.

Noh: It was no problem with Chase since I knew the bank.

Park: Yeah.

Noh: Then we decided to go to Citi, but when we were going to go to the Citibank, to the Korea, the area, the Korean, he has done some job in that area with 586 already [Your Affiant believes that defendant Seung-Ho Noh and defendant Yoon-Hee Park decided against opening the account at a Citibank because defendant Yoon-Hee Park had already defrauded that bank using a fraudulently obtained 586 identity].

Park: Ah.

Noh: So we went to . . . [Nassau County].

Park: Yeah, yeah.

Noh: But that man [defendant Yoon-Hee Park], I knew he had an original licence. . . . [f]rom Pennsylvania.

Park: Yeah.

Noh: But when he popped out a license, he pulled out a New York one that **looked like a obvious fake one**. (emphasis added).

Park: The New York one?

Noh: Yeah, yeah. The New York one that was made, I mean.

Park: Aha, the New York one **that was made here**, you mean? (emphasis added).

Noh: Yeah, yeah. He pulled out the fake one. Not the Pennsylvania one but the fake one.

Park: Umm.

Noh: And then the bank teller was asking the social number, why the social card looked like a blue print, [a] blue print [a reference to being counterfeit].

Park: Yeah, yeah.

Noh: He pulled that one out. **At that moment, I knew I was screwed**. (emphasis added). I asked him why he pulled that one out and why he even carried that. I asked him if he had a legitimate one. He said that he just used it.

Park: Yeah.

Noh: At that moment, the police caught up on us.

Park: Umm.

Noh: So we were all arrested.

\* \* \* \*

Noh: You know that man [defendant Yoon-Hee Park] has made much money with the 586 going through Citibank.  
Park: Going through Citi?  
Noh: Yeah, yeah, going through Citibank.  
Park: Ah.  
Noh: So we went to the Citibank. But . . . that area is . . . well known for its very strong police force in New York.

\* \* \* \*

Noh: So that, I, at that time, had some documents in my car. What it was that I had some documents to do some tax work.  
Park: Yeah.

\* \* \* \*

Noh: From my documents, they found his documents about taxes and the 586 social numbers. All those were in my briefcase. That was the problem. I had a chance to get out but when they search my car, they found them in my briefcase. So I was arrested together [sic] because they asked me what those [documents] were.

h. Law enforcement have reviewed defendant Seung-Ho Noh's notebook. The notebook contained approximately 60 handwritten entries of Chinese names with corresponding 586 social security numbers. In furtherance of the Park Criminal Enterprise, defendant Seung-Ho Noh and his co-conspirators used these fraudulently obtained 586 social security numbers to file fraudulent tax returns and obtain tax refunds from the Internal Revenue Service in 2008 and 2009, seeking approximately \$500,000 in refunds.

i. On or about December 30, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Seung-Ho Noh. During this intercepted conversation, the following discussion ensued, in substance and in part:

Noh: Can I buy gift cards from Abercrombie [a reference to Abercrombie and Fitch, retail clothing store]?

Park: Yes, you can.  
Noh: Ah, then can I use it although the card was issued not too long ago?

\* \* \* \*

Park: But, it's hard for me to do if you make \$1,000 or \$2,000, you should do more than \$5,000.  
Noh: Man, I can only do up to \$2,000.  
Park: Then, why are you trying to shop at Abercrombie?

\* \* \* \*

Park: You can do k Kang.  
Noh: Where?  
Park: Bring it over here, I will do it for you.  
Noh: Ah, then can it be done for 20%?  
Park: Yes, that's better, if you are not doing the big amount.  
Noh: Oh, I got it.  
Park: Bring in over. I will do it for you.

j. Later that day, during a subsequent telephone call over the First Target Facility, defendant Seung-Ho Noh asked, "[I]f I bring it tomorrow, can you get me some money? I am rather desperate for money." Defendant Sang-Hyun Park replied, "Oooh. That won't work. Money should come in before I give you the cut." Defendant Sang-Hyun Park stated that it would take approximately three days for the money to come in [from the merchant bank associated with defendant Sang-Hyun Park's credit card machines].

k. On or about December 31, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Seung-Ho Noh. During this intercepted conversation, defendant Seung-Ho Noh stated, "[I] swiped the Discover card earlier . . . I got the bill already. . . it was \$80 something, can I bust it now or not yet?" Defendant Sang-Hyun Park replied, "Yes, you can. . . ."

93. Defendant Alex S. Lee

a. On or about February 27, 2010, defendant Alex S. Lee entered a Saks Fifth Avenue store in Bergen County, New Jersey and opened a line of credit account with that store using a counterfeit California driver's license in the name of Yicun Zhu, a corresponding 586 social security number, and Macy's Visa credit card in the name of Yicun Zhu. After opening this line of credit in the name of Yican Zhu, defendant Alex S. Lee purchased approximately \$2,875.50 in merchandise from the store, including a Louis Vuitton bag (\$1,410), Louis Vuitton belt (\$575), and a Louis Vuitton wallet (\$740). After placing this merchandise in his car, defendant Alex S. Lee returned to the store and attempted to open a second line of credit in the name of Yun Hu, using a Pennsylvania driver's license (see Paragraph 51 above), a corresponding 586 social security number, and a Citibank credit card in the name of Yun Hu. Thereafter, store personnel approached defendant Alex S. Lee, he fled the store, and was detained. After local police arrested defendant Alex S. Lee, the following items were found on his person: (a) documents related to two TD Bank accounts opened in the name of Yicun Zhu and Yun Hu; (b) documents related to a Citibank account opened in the name of Yicun Zhu; (c) documents related to a checking account at Wachovia opened in the name of Yun Hu; (d) documents related to a checking account at Chase opened in the name of Yun Hu; (e) a genuinely issued but fraudulently obtained Pennsylvania driver's license in the name of Yun Hu; (f) a counterfeit California driver's license in the name of Yicun Zhu; (g) a Macy's credit card in the name of Yicun Zhu; (h) a Citibank credit card in the name of Yun Hu; and (i) a receipt from PC Richard and Son, located in Bergen County, New Jersey, for the purchase of a \$2,049.97 flat screen television purchased using the name Yicun Zhu (defendant Alex S. Lee used the Yican Zhu identity to obtain a charge account at PC Richard and Son, which charge account was used to purchase the flat screen television).

b. On or about February 27, 2010, defendant Alex S. Lee, in a written statement to police, admitted that he used false information to fraudulently open an account at Saks Fifth Avenue and thereafter purchased merchandise using this fraudulently opened account.

c. In total, defendant Alex S. Lee caused in excess of \$40,000 in losses to credit card companies and retail stores through his use of the fraudulent identities and the "bust out" of the credit cards obtained with those fraudulently obtained identities.

d. As described in Paragraph 102 below, defendant Matthew J. Kang did the credit build up for both Chinese identities possessed and used by defendant Alex S. Lee.

94. **Defendants Yong Kim Lee and Hi-Joo Yang**

a. On or about October 3, 2009, at approximately 12:17 p.m., a law enforcement officer conducting surveillance near the Bergen Turnpike Office observed and video recorded defendants Seung-Ho Noh and Yong Kim Lee exit a car, driven by another person, and enter a driveway leading to the Bergen Turnpike Office.

b. On or about October 3, 2009, at approximately 11:28 a.m., over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Seung-Ho Noh. During this intercepted conversation, defendant Seung-Ho Noh asked for directions to defendant Sang-Hyun Park's Bergen Turnpike Office. Defendant Hyun-Jin LNU told defendant Seung-Ho Noh that the "woman [the customer accompanying defendant Seung-Ho Noh] has the address."

c. On or about April 15, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Yong Kim Lee. During this intercepted conversation, defendant Yong Kim Lee stated she wanted to introduce a customer to defendant Sang-Hyun Park. They agreed to meet on April 22, 2010. During this conversation, defendant Yong Kim Lee stated the customer is filing for bankruptcy and "[the customer] has been making payments on the cards but they are all maxed out." Defendant Sang-Hyun Park replied, "Bring them to me. . . . Bring the cards, I will help [the customer]."

d. On or about April 22, 2010, law enforcement officers were conducting surveillance near the Bergen Turnpike Office. The officers observed a car registered to defendant Hi-Joo Yang pull into the Bergen Turnpike Office's adjacent parking lot with two occupants in the car (one male and one female). After approximately 50 minutes, the car departed, was followed to Linden, New Jersey, and defendant Yong Kim Lee was photographed exiting the car.

e. On or about April 27, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Hi-Joo Yang. During this conversation, defendant Hi-Joo Yang reminded defendant Sang-Hyun Park that they had met on April 22, 2010 with defendant Yong Kim Lee.

f. On or about April 28, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Yong Kim Lee. During this conversation, defendant Yong Kim Lee stated, "You know Deacon Yang [defendant Hi-Joo Yang] . . . . about doing the bank, he is concerned about someone knocking [on] his door, nothing like that would happen, right?" Defendant Sang-Hyun Park replied, "Nothing like that would ever happen." Defendant Yong Kim Lee then stated, "I recommended to him that it would be better to just do it promptly than borrowing money just to make payments. Anyway, he is going to come see me tomorrow to open another bank account." Defendant Sang-Hyun Park stated that he [defendant Hi-Joo Yang] called yesterday.

g. On or about April 30, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Yong Kim Lee. Defendant Yong Kim Lee stated that defendant Hi-Joo Yang "is withdrawing cash from whatever is left over from the credit . . . . so I told him that Mr. Jimmy Park is honest because unlike other [schemers] who would take out [money] without keeping him [Hi-Joo Yang] in the loop. By the way, the Deacon [Hi-Joo Yang] is not himself at the movement . . . . [chuckles] because he is concerned about committing sins before God [chuckles]."

h. According to records from Bank of America, on or about May 1, 2010, a Bank of America credit card issued on the name of defendant Hi-Joo Yang was used to obtain a \$3,000 cash advance.

i. According to records from Chase Bank, on or about May 1, 2010, in Whitestone, New York, a Chase Bank credit card issued on the name of defendant Hi-Joo Yang was used to obtain a \$1,300 cash advance.

j. According to records from Chase Bank, on or about May 1, 2010, a Chase Bank credit card issued on the name of defendant Hi-Joo Yang was used to obtain \$500 through a cash advance (ATM) on a second Chase Bank credit card.

k. On or about May 1, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Yong Kim Lee. During this conversation, defendant Yong Kim Lee stated that she had received all of the documents and the card from defendant Hi-Joo Yang, and she agreed to mail these items to defendant Sang-Hyun Park at the Bergen Turnpike Office. On or about May 4, 2010, over the First Park

Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Yong Kim Lee and confirmed his receipt of the documents.

l. On or about May 4, 2010, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Hi-Joo Yang. During this conversation, defendant Hyun-Jin LNU stated, "I have some question for you . . . among your Chase cards . . . . Circuit City Reward . . . . the card . . . . what's the limit on that card?" Defendant Hi-Joo Yang replied, "It has \$6,900."

m. On or about May 4, 2010, according to records from Bank of America, a check payment was made in the amount of \$6,800 toward defendant Hi-Joo Yang's Bank of America account. On or about May 6, 2010, a check payment was made in the amount of \$2,000 toward defendant Hi-Joo Yang's Bank of America account. These payment were returned for insufficient funds.

n. From on or about May 7 through May 10, 2010, according to records from Chase Bank, multiple telephone and online payments were made toward defendant Hi-Joo Yang's Chase Bank credit card accounts, including payments in the approximate amounts of \$4,200, \$2,300, \$2,000, \$1,000, and \$5,400. All of these payment were returned for insufficient funds.

o. On or about May 8, 2010, the following credit card charges were made against several Chase credit cards issued to defendant Hi-Joo Yang:

Merchant	Approximate Amount
Cocoxu	\$782
A liquor store in Palisades Park , New Jersey ( <u>see</u> Paragraph 41q below) Charge made on or about May 8, 2010	\$2,246
A liquor store in Fort Lee, New Jersey	\$3,735

p. In total, in or about May 2010, numerous charges were made against several credit cards issued to defendant Hi-Joo Yang. These charges were not paid, resulting in a total loss of approximately \$50,000.



q. On or about May 8, 2010, a law enforcement officer was conducting surveillance near a liquor store in Palisades Park, New Jersey. During this surveillance, the law enforcement officer observed and video recorded defendant Hyun-Jin LNU exit the liquor store with six cases of Johnny Walker whiskey (being carried by a store employee). Thereafter, defendant Osung Kwon was observed and video recorded loading the six cases of liquor into a black Mercedes-Benz SUV. The law enforcement officer then followed defendants Hyun-Jin LNU and Osung Kwon drive back to the Bergen Turnpike Office.

95. **Defendant Kyung-Ki Kim**

a. On or about July 8, 2010, defendant Kyung-Ki Kim entered Valley National Bank, in Fort Lee, New Jersey, and attempted to open a checking account using a counterfeit California driver's license in the name of Yuting Zhao with a corresponding 586 social security number. The bank contacted the local police, who questioned defendant Kyung-Ki Kim and told him that the driver's license was counterfeit. Thereafter, he admitted that his real name was Kyung K. Kim and that he paid \$1,500 for the counterfeit California driver's license. Defendant Kyung-Ki Kim further admitted that he drove to the bank, and his car was parked nearby. Thereafter, police officers approached the car and observed an individual, later identified as defendant Osung Kwon, sleeping in the car. When police asked defendant Osung Kwon for his identification, he provided the officers with defendant Kyung-Ki Kim's New Jersey driver's license and then falsely claimed that the driver's license belonged to him. Thereafter, police searched defendant Osung Kwon's wallet and found a New Jersey driver's license and a Chase Visa debit card, both in the name of another person. Later, during a video taped interview of defendant Kyung-Ki Kim by law enforcement, he admitted that he purchased the counterfeit driver's license from defendant Sang-Hyun Park.

b. In addition, the investigation has revealed that defendant Kyung-Ki Kim "busted out" credit cards in his own name, through the assistance of defendants Sang-Hyun Park and Min-Soo Son, and other co-conspirators. Defendant Kyung-Ki Kim applied for and received credit cards from various banks, credit card companies, and retail stores, including Bank of America, Capital One Bank, Chase, Macy's, Kohls, Home Depot, and Nordstrom, among others. After obtaining these credit cards, defendant Kyung-Ki Kim made charges on credit card. On or about December 18, 2009, according to bank records and a photograph from Bank of America's surveillance video, defendant Min-Soo Son entered a Bank of America branch in Englewood, New Jersey and made a payment, in

the form of a check drawn on the account of Erins Skin Care, Inc., in the amount of \$7,825, toward defendant Kyung-Ki Kim's Bank of America credit card. On or about December 24, 2009, this check was returned for insufficient funds. After the bank credited this payment but before it was returned because of insufficient funds, defendant Kyung-Ki Kim's Bank of America credit card was used to make numerous charges, including charges Li Nails Plus (on or about December 19, 2009 in the amount of approximately \$5,121.94) and New M&K Global (December 21, 2009 in the amount of \$2,520.24). In total, defendant Kyung-Ki Kim and his co-conspirators obtained approximately \$45,000 from the credit cards referred to above by "busting out" these credit cards.

96. Bank Fraud—Check-Kiting (i.e., "Check Jobs")

a. In addition to committing credit card fraud, as described above, the Park Criminal Enterprise and its co-conspirators use the fraudulently obtained identities and identity documents, including counterfeited identities, to commit bank fraud to enrich themselves and their co-conspirators. In furtherance of this scheme, the Park Criminal Enterprise opened checking accounts and to obtained checkbooks in Chinese names with corresponding 586 social security numbers (hereinafter "586 Accounts"). Thereafter, the Park Criminal Enterprise and its co-conspirators deposited and attempted to deposit checks, drawn on 586 Accounts, into other 586 Accounts. These checks were drawn against accounts with non-existent funds. After depositing these fraudulent checks, the Park Criminal Enterprise and its co-conspirators withdrew and attempted to withdraw cash from these 586 Accounts before the bank discovered the checks to be fraudulent. The following paragraphs provide example where the Park Criminal Enterprise and its co-conspirators committed and attempted to commit bank fraud through kiting checks:

Approximate Date	Description
July 24, 2009	Defendant Hyun-Jin LNU opened and caused to be opened a business checking account at Wachovia Bank, Rutherford, New Jersey, in the name Citi Apparel Distributor, using the name "Hai Hua Xu," a corresponding 586 social security number, the identification card she obtained through the IDMV, a tax identification number (the same 586 social security number corresponding to Hai Hua Xu), and her previous address.

Approximate Date	Description
January 4, 2010	According to bank records and a photograph from the bank's surveillance video, defendant Hyun-Jin LNU deposited a check, drawn on a account belonging to Limin Sun (a name corresponding to a 586 social security number), in the amount of approximately \$4,920 and payable to Citi Fashion, which check was deposited into the Citi Fashion Wholesale Account. This \$4,920 was returned for insufficient funds.
January 4, 2010	According to bank records and a photograph from the bank's surveillance video, defendant Hyun-Jin LNU cashed a check, drawn on the Citi Fashion Wholesale Account, in the amount of \$2,400 and made payable to "cash."
January 5, 2010	According to bank records and a photograph from the bank's surveillance video, defendant Hyun-Jin LNU deposited a check, drawn on a account belonging to Limin Sun (a name corresponding to a 586 social security number), in the amount of approximately \$3,000 and payable to Citi Fashion, which check was deposited into the Citi Fashion Wholesale Account. This \$3,000 check was returned for insufficient funds.
January 5, 2010	According to bank records and a photograph from the bank's surveillance video, defendant Hyun-Jin LNU cashed two check, both drawn on the Citi Fashion Wholesale Account, in the amounts of \$3,000 and \$1,500 and both made payable to "cash." In total, through this check-kiting scheme, defendant Hyun-Jin LNU defrauded Wachovia Bank, causing a loss of approximately \$6,900.

Approximate Date	Description
March 8, 2010	<p>According to bank records and photographs from Chase Bank, Ridgefield, New Jersey, defendant Osung Kwon opened a business checking account in the name of USA Apparel using the name "Xiaoling Zhang," a corresponding 586 social security number, a counterfeit Nevada driver's license, and defendant Osung Kwon's home address. According to records from Immigration and Customs Enforcement (hereinafter "ICE"), defendant Osung Kwon is an illegal alien who entered the United States from the Republic of Korea and was never issued a social security number.</p>
April 29, 2010	<p>According to records from Bank of America and a photograph from the bank's surveillance video, defendant Joong-Hyun Jung entered a Bank of America branch in Leonia, New Jersey and, deposited a check from USA Apparel (see Paragraph directly above, dated March 8, 2010, regarding this account), in the amount of \$6,291.55, into a business account belonging to a co-conspirator in Los Angeles, California. According to records from the Bank of America, this account, at the time of the transaction, was overdrawn by approximately \$5,100.</p>
May 6, 2010	<p>Defendant Joong-Hyun Jung entered a Chase Bank branch in Ridgefield, New Jersey and, according to bank records and a photograph from the bank's surveillance video, deposited a check drawn on a company registered to a Chinese name with a corresponding 586 social security number, in the amount of \$7,690.70, into a business account belonging to USA Apparel Inc.</p>

Approximate Date	Description
June 25, 2010	According to records from Valley National Bank and a photograph from the bank's surveillance video, defendant Osung Kwon entered a Valley National Bank in Bergen County, New Jersey and deposited a check in the amount of \$6,000, drawn on the account of "Cheng Yu Ma," into the account in the name of Meihong He [defendant Hye-Won Jun's Chinese alias]. This check was returned for insufficient funds.

**The Credit Build Up Teams**

97. Your Affiant's investigation has revealed that the ability of the Park Criminal Enterprise to commit credit card fraud, bank fraud, and other financial frauds is directly tied to the individuals and entities who build the credit scores of the fraudulently acquired Chinese identities (see Paragraph 48 for an explaining of how the build up was accomplish). As part of this process and to ensure its success, the individuals who build credit scores make false statements and representations to credit reporting agencies and others. For example, to establish an address history for the fraudulently obtained Chinese identities and corresponding 586 social security number, an essential element of the credit build up, the individuals involved in credit build up knowingly made false statements concerning the residency of these identities.

98. After the Chinese identity is attached to the primary account (i.e., the individual's credit card account who is engaged in the credit build up), the credit card company issued a credit card, in the name of the Chinese identity, to the address provided by the primary account holder. These credit cards, however, are not used.

99. After the credit score related to the Chinese identity had been increased, the individual involved in the build up removed these identities from their primary account to prevent the primary account from being negatively effected by the impending "bust out" activity.

100. By attaching these identities to their credit card accounts, the individuals involved in the credit build up caused the credit scores associated with these fraudulently obtained Chinese identities to be artificially and fraudulently increased

for the purpose of committing financial fraud, including bank and credit card fraud.

101. On or about September 16, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from an unknown co-conspirator. During this intercepted conversation, the unknown co-conspirator asked, "Then, president, can't you rush the build up guys?" Defendant Sang-Hyun Park replied that the build up was finished but pending an address verification. The unknown co-conspirator asked, "[D]on't the build up people do changing of the address as well?," and Sang-Hyun Park stated that he was using a different build up person "because those [last build up] guys took too long." Later, the unknown co-conspirator acknowledged that Saks Fifth Avenue approved the card but Nordstrom denied the application. Defendant Sang-Hyun Park advised the unknown co-conspirator that the "reason was that Saks took Equifax, so the address was correct and that's why they gave you a card but in the case of Nordstrom, [the store] accepts [uses] Experian and when [the store] looked at Experian, the address didn't match." The unknown co-conspirator asked Sang-Hyun Park if he could "rush" the build up of the credit score by offering more money. Defendant Sang-Hyun Park replied, "Of course, we have to do it quickly [b]ut I have to get that done, too, so I can get my 50%."

102. **Defendant Matthew J. Kang**

a. On or about September 14, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Matthew J. Kang. During this intercepted conversation, defendant Sang-Hyun Park asked defendant Matthew J. Kang "[c]an you take any 586 customers?" Defendant Matthew J. Kang replied, "Well, I think, should we wait until [the customer] gets through?," and defendant Sang-Hyun Park agreed. Defendant Matthew J. Kang then asked defendant Sang-Hyun Park if "they prepare[d] the IDs at that end, yet?," and Sang-Hyun Park replied, "[I was told] the IDs will come this Friday."

b. On or about September 23, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Matthew J. Kang. During this intercepted conversation, defendant Sang-Hyun Park stated, "I have to go to Macy's and a few other places. Aren't you gonna do the banks?" Defendant Matthew J. Kang replied, "I did one at Citi . . . . [t]he others didn't look so good so I intentionally didn't do them." Defendant Sang-Hyun Park then asked for the password and identification for a customer's credit report.

c. On or about November 4, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Matthew J. Kang. During this intercepted phone conversation, the following discussion ensued, in substance and in part:

Kang: Yes, President Park. How are you?  
Park: Yes, Mr. Kang.  
Kang: You've been busy. Yes, yes. I'm calling to see if you got the IDs and stuff.  
Park: I just talked to [the person] and [the person] said it's coming on Saturday.  
Kang: Saturday?  
Park: Yes.  
Kang: I see . . . . Call me.  
Park: Yes.  
Kang: And, you, you said it's hard to bust out the Chase cards, right?  
Park: No, it doesn't matter. . . . [I]t doesn't matter but [they do] chargeback so [you] need to buy a merchandise and resell it.  
Kang: Ah!  
Park: It's hard to get it out from Chase. Of course cash advance, it wouldn't matter if the limit for cash and purchase are the same.  
Kang: Yes, yes.  
Park: However, if the limit is \$5,000 . . . . cash, cash is like \$1,500, then the rest has to be done through buying merchandise.  
Kang: Mm-mm.  
Park: [I]'m saying you can't swipe on our machine.  
Kang: Ah, to buy merchandise the person needs to go around him/herself and make the purchase.  
Park: Right, right.

d. On or about April 14, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from Matthew J. Kang. During this intercepted conversation, the following discussion ensued, in substance and in part:

Park: *I have something that I have to build up.*  
(emphasis added).  
Kang: Oh. I see.  
Park: I told you about it last week.  
Kang: Yes. . . .

\* \* \* \*

Park: Also, 3 or 4 customers of ours got theirs [accounts] closed. They don't own cards. I looked at their files and they had problems with their accounts with another major bank, Citibank, or they didn't make payments for their cards.

Kang: It seems that way.

Park: So I think the computer networks of Citi and BoA may be collaborating. Or as you said BoA reviews their own files of the customers and if they are deeply in debt or-

Kang: As I understand it, banks don't share detailed information of customers but the credit report is open to all. It seems that they review it . . . . They collaborate with credit report companies and exchange information rapidly. I don't understand it but it seems that's what they do. Anyway, that's it. Hahaha.

Park: Then I will later today-

Kang: Please call me later.

Park: I sold all the liquor for the lady and I'll summarize the task for you. *When should I give you the build up tasks for 4 people?* (emphasis added).

Kang: The earlier the better.

Park: Okay. This week.

\* \* \* \*

Kang: You took almost \$14,000 out for the lady . . . that she can take home?

Park: What I bought the liquor with?

Kang: **Yes. You took a lot out.** [a reference to fraudulently obtained money](emphasis added).

Park: We took a lot out.

Kang: Yes.

Park: I will give you a clean account for that.

Kang: Okay. Do what you have to do.

Park: I will call you back.

Kang: Okay. Thank you.

Park: Okay.

e. On or about April 14, 2010, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Matthew J. Kang. During this intercepted conversation, defendant Sang-Hyun Park stated, "I got them all ready. I finished putting together the ladies. . . . [They] have



charged about \$26,000 at that time." Defendant Matthew J. Kang replied, "I thought so." [Based on this conversation, Your Affiant believes that defendant Sang-Hyun Park was referring to money, specifically \$26,000, that had been obtained through "busting out" credit cards]. Defendant Sang-Hyun Park then stated, "So, I owe you \$13,000 something," and defendant Matthew J. Kang replied, "Yes." They agreed to meet later that day at a coffee shop next to Cello Hair.

f. On or about April 14, 2010, a law enforcement officer was conducting surveillance near Cello Hair, in Palisades Park, New Jersey. During this surveillance, the law enforcement officer observed and video recorded defendant Matthew J. Kang meeting with defendant Hyun-Jin LNU in a coffee shop next to Cello Hair.

g. During this investigation, federal agents obtained records from American Express, Citibank, and credit reporting agencies pertaining to credit card accounts belonging to defendant Matthew J. Kang (using the name "Matthew J. Kang"). These records reveal that beginning in or about July 2007 defendant Matthew J. Kang has attached at least 70 individuals to his credit card accounts as authorized users. The vast majority of the names attached to defendant Matthew J. Kang's accounts are Chinese names with corresponding 586 social security numbers. These Chinese names were removed from his credit card accounts before the credit cards were used to commit fraud, as follows:

Chinese Name/ SSN	Real Identity	Remarks
"J.Z."  586	Cooperating Witness One	Cooperating Witness One purchased a 586 social security card and counterfeit California driver's license in the name of "J.Z." from defendants Sang-Hyun Park and Hyun-Jin LNU on or about May 8, 2010.

Chinese Name/ SSN	Real Identity	Remarks
"D.M.L." 586	Undercover Agent	The Undercover Agent purchased a 586 social security card and counterfeit California driver's licenses in the name of "D.M.L." from defendants Sang-Hyun Park and Hyun-Jin LNU.
Yulan Qian 586	Defendant Amy Yang	Defendant Amy Yang used this fraudulent identity (Yulan Qian), together with a counterfeit Nevada driver's license and corresponding 586 social security number, to open an account at Valley National Bank. She also used this fraudulently obtained identity to obtain approximately two credit cards.
Yuting Zhao 586	Defendant Kyung-Ki Kim	Defendant Kyung K. Kim told police officers that he paid defendant Sang-Hyun Park \$1,500 for a counterfeit California driver's license with a corresponding 586 social security number in the name of Yuting Zhao. Defendant Kyung K. Kim was arrested as he attempted to open a bank account using this fraudulently obtained identity.
Fei Chen 586	Defendant Young-Woo Ji	Defendant Young Woo Ji obtained a driver's license from the IDMV using a 586 social security number not issued to him.

Chinese Name/ SSN	Real Identity	Remarks
Yicun Zhu  586	Alex S. Lee	Defendant Alex S. Lee used this fraudulent identity (Yican Zhu), a corresponding 586 social security number, and a counterfeit California driver's license, to open a line of credit at Saks Fifth Avenue, in Bergen County, New Jersey. In addition, defendant Alex S. Lee used this fraudulent identity to obtain a charge account at PC Richard and Son, which credit card was used to purchase a flat screen television.
Yun Hu  586	Alex S. Lee	Defendant Alex S. Lee attempted used this fraudulent identity (Yun Hu), together with a fraudulently obtained Pennsylvania driver's license and corresponding 586 social security number, to open a line of credit at Saks Fifth Avenue, in Bergen County, New Jersey.
Meihong He  586	Defendant Hye-Won Jung	Defendant Hye-Won Jung used this fraudulent identity (Meihong He) and a corresponding 586 social security number, to obtain approximately ten credit cards and lines of credit from various credit card companies and retail stores. These charges were not paid, resulting in a total loss of approximately \$8,000.

Chinese Name/ SSN	Real Identity	Remarks
Run Hong Liu  586	Defendant Song-Ja Park	Defendant Song-Ja Park, used this fraudulent identity (Run Hong Liu), a corresponding 586 social security number, and a counterfeit Nevada driver's license, to open an account at Chase Manhattan Bank, in Bergen County, New Jersey.

103. **Defendant Rita S. Kim and Hyon-Suk Chung**

a. During this investigation, federal agents obtained records from American Express, Citibank, and credit reporting agencies pertaining to credit card accounts belonging to defendants Rita S. Kim and Hyon-Suk Chung, owner/operators of Shin Yong Consulting, LLC, d/b/a Shin Hwa Consulting. These records reveal that beginning in or about July 2008, defendants Rita S. Kim and Hyon-Suk Chung have attached at least 65 individuals to their credit card accounts as authorized users. The vast majority of the names attached to their accounts are Chinese names with corresponding 586 social security numbers. These Chinese names were removed from their credit card accounts before the credit cards were used to commit fraud, as follows

Chinese Name/ SSN	Real Identity	Remarks
"Y.L."	Cooperating Witness One	Cooperating Witness One purchased a 586 social security card then use it to obtain an Illinois driver's license.
"Y.F.Z."  586	Cooperating Witness Two	Cooperating Witness Two purchased a 586 social security card and counterfeit Nevada driver's license in the name of "Y.F.Z." from defendants Sang-Hyun Park, Hyun-Jin LNU, and Young-Hee Ju.

Chinese Name/ SSN	Real Identity	Remarks
Zhankun Liu 586	Dong-Il Kim	Defendant Dong-Il Kim obtained a driver's license from the IDMV using a 586 social security number not issued to him in the name of Zhankun Liu.
Qing Yun Wang 586	unknown	In or about July 2009, the Qing Yun Wang identity was attached to defendant Hyon-Suk Chung's Citibank credit card as an authorized user.
Dongshu Li 586	Jong-Kwan Hong	Defendant Jong-Kwan Hong used the Chinese name Dongshu Li, a corresponding 586 social security number not issued to him, and a counterfeit Nevada driver's license to open accounts and obtain credit cards.
Dongshu Li 586	Jong-Kwan Hong	In or about mid-2009, the Dongshu Li identity was attached to defendant Rita S. Kim's Citibank credit card as an authorized user.
Wei Yun Zhong 586	Dong-Won Kim	Defendant Dong-Won Kim obtained a driver's license from the IDMV using a 586 social security number not issued to him in the name of Wei Yun Zhong.  In or about mid-2009, the Wei Yun Zhong identity was attached to defendant Rita S. Kim's Citibank credit card as an authorized user.

Chinese Name/ SSN	Real Identity	Remarks
Cheng Yu Ma  586	unknown	This Chinese identity was used to commit a variety of frauds (see Paragraphs 84e, 89h, and 96 above).  In or about mid-2009, the Cheng Yu Ma identity was attached to defendant Rita S. Kim's Citibank credit card as an authorized user.

104. Defendant Young-Woo Ji

a. As described above in Paragraphs 8, defendant Young-Woo Ji conspired with defendant Sang-Hyun Park to do the credit build up for defendant In-Sook Lee's Chinese identity, Ping Fang.

b. On or about October 3, 2009, over the First Park Facility, defendant Sang-Hyun Park spoke with defendant Hyun-Jin LNU (using another co-conspirator's cellular telephone). During this intercepted conversation, defendants Sang-Hyun Park and Hyun-Jin LNU discussed the status of credit build ups/address verifications being worked on by defendant Young-Woo Ji. Defendant Sang-Hyun Park instructed her to not inquire into a customer's credit history because it lowers the credit score. Defendant Sang-Hyun Park stated, "The rest should be done like you said. He [defendant Young-Woo Ji] treated the money that was given like this: [defendant Yong Kim Lee and another customer] . . . are \$500 and \$500, so it's \$1,00 total, but he [defendant Young-Woo Ji] settled with \$800 sent that time. . . ." Later during the conversation, defendant Sang-Hyun Park stated, "I heard [defendant Young-Woo Ji] asked you to send some document over . . . . bill and . . . in order to put the address of himself, he needs [the] bill and a bank payment. . . . Once he [defendant Young-Woo Ji] can verify the address and finish the build up, that address will show up [on the customer credit report]. . . . About the two build up [sic] that went into [defendant Young-Woo Ji] in order for those to [appear on the customer's credit report] he needs two proof[s] of residence." Defendant Hyun-Jin LNU acknowledged that she understood.

### The Collusive Merchants—"Kkang"

a. In furtherance of the scheme, the Park Criminal Enterprise and its co-conspirators use credit card machines to obtain money by charging or "swiping" the fraudulently obtained credit cards. To carry out the scheme, the collusive merchant enters into a contract with a Merchant Bank (often referred to as Acquiring Bank) and sets up an account with the Merchant/ Acquiring Bank. This account allows all approved credit card transactions conducted by the collusive merchant to be processed and deposited into the collusive merchant's bank account, and then, transferred into the collusive merchant's business banking account. On a daily basis, the Merchant/ Acquiring Bank will receive all authorized credit card transactions from the collusive merchant and settle (obtain payment) from the respective credit cards entities. Thereafter, the Merchant/ Acquiring Bank deposits the proceeds into the collusive merchant's bank account.

b. As part of the scheme, the Collusive Merchants often change merchants and routinely change the names of their entities to avoid detection and scrutiny by law enforcement.

#### 105. Defendant Sang-Hyun Park

a. On or about September 9, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to a co-conspirator (a Korean-speaking male). During this intercepted conversation, the unknown male stated "you know the card you worked on for "round two" [a reference to busting out credit cards], to swipe it, how much processing fee do you take . . . [r]ound two, that the merchant swipes?" Defendant Sang-Hyun Park responded: "I charge 20% kkang fee. . . . It is 20% no matter what, if it's swiping the card." The unknown male then stated to call him "if there is anything good" because he wanted to make some money. Defendant Sang-Hyun Park questioned the unknown male about how he uses credit cards, and the unknown male stated, "I don't do it on the [credit card] machine. I spin [sic] it . . . . I take out the cash that I can take out. And I buy [gift cards]."

b. During this investigation, federal agents have reviewed the bank accounts of Cocoxu and Li Nails. Defendant Sang-Hyun Park opened these accounts and is the authorized signatory on these accounts. These records reveal that the vast majority of deposits into these accounts originates from credit card transactions—i.e., credit card charges or "swipes" made through credit card machines. In total, from in or about June

2009 through in or about July 2010, approximately \$880,000 was collectively deposited into these two accounts. After this money was deposited into these accounts, the vast majority of the money was either withdrawn by checks (payable to cash) or transferred through wire transactions. The following chart sets forth some of these wire transactions, among others:

Date of Wire Transaction	From	To	Amount	Remarks
June 16, 2009	Cocoxu	bank in Seoul, South Korea	\$6,000	Payment
July 22, 2009	Cocoxu	bank in Seoul, South Korea	\$1,300	Gift
July 22, 2009	Cocoxu	bank in Seoul, South Korea	\$2,000	Gift
August 19, 2009	Cocoxu	bank in Seoul, South Korea	\$2,500	Gift
August 24, 2009	Cocoxu	bank in Seoul, South Korea	\$1,700	Gift
September 8, 2009	Cocoxu	bank in Seoul, South Korea	\$4,000	Gift
November 9, 2009	Cocoxu	bank in Seoul, South Korea	\$9,000	Payment
December 10, 2009	Cocoxu	bank in Seoul, South Korea	\$5,500	Gift
March 3, 2010	Cocoxu	bank in Seoul, South Korea	\$7,000	Purchase of Merchandise
July 1, 2010	Li Nails	bank in Seoul, South Korea	\$1,000	None

**106. Defendant Hyeon-U Kim and Sunny Enterprises**

a. On or about September 14, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing phone call to defendant Hyeon-U Kim. During this intercepted conversation, defendant Sang-Hyun Park asked how much of a credit card charge "Sunny Enterprises swipe at one time?" Defendant Hyeon-U Kim stated, "I don't think it's good to swipe too much, maybe \$2,000," and they agreed to swipe \$2,300. Defendant Sang-Hyun Park said "we will send the invoice when we are told. It



will be nice to get the money." Defendant Sang-Hyun Park concluded the call by stating he would call back defendant Hyeon-U Kim after he swiped the card.

b. As described above, a fraudulently obtained credit card in the Y.L. Identity [Cooperating Witness One] was charged to Sunny Enterprises.

**107. Defendant Hyo-Il Song—153 Samsung DC and 90 You and Me**

a. 153 Samsung DC, Inc. was incorporated in New Jersey under the name Haizhe Pei, an identity used by defendant Hyo-Il Song.

b. On or about December 21, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Hyo-Il Song. During this intercepted conversation, defendant Sang-Hyun Park stated that he needed to "swipe the card one more time for about \$5,000. . . . That's the remaining available balance." Defendant Hyo-Il Song stated that he would go to defendant Sang-Hyun Park's location, and defendant Sang-Hyun Park stated, "If possible, I want to swipe it on your equipment. . . . We don't need to make other people make money."

c. On or about December 23, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Dong-Won Kim. During this intercepted conversation, defendant Dong-Won Kim stated, "I am on my way. I am just . . . crossing the George Washington Bridge." After defendant Dong-Won Kim stated that the amount on the card was in excess of \$11,000, defendant Sang-Hyun Park suggested, "I am short of equipment and have to use President Daniel's equipment to swipe [defendant Hyo-Il Song]. . . . Shall I tell Daniel to bring the equipment here?" Defendant Dong-Won Kim replied, "Yes, do that. And, if you need equipment, take one of mine. I have one that can swipe up to \$2,000." During a subsequent intercepted phone call between defendants Sang-Hyun Park and Dong-Won Kim later that day, defendant Sang-Hyun Park stated that he swiped "\$5,012," and "I swiped it on Daniel's equipment." During yet another intercepted phone call between defendants Sang-Hyun Park and Dong-Won Kim later that day, defendant Sang-Hyun Park stated, "\$4,897 was swiped at Li Nail shop. . . . [A]nd \$5,012 was swiped at You and Me. . . . [and \$1,210 was swiped at Erins Skin Supply]."

d. On or about December 24, 2009, over the First Park Facility, while off the hook and placing a call to defendant Dong-Won Kim, defendant Sang-Hyun Park was intercepted making the

following statements to unknown individuals: "You need to be on the move, too. From \$40,000, \$50,000, about \$27,000 is left. So both of you go and since it's about \$14,000, okay? Just ID . . . take 586 one, not the personal one."

e. On or about April 12, 2010, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Hyo-Il Song, a/k/a "Daniel." The following intercepted conversation ensued, in substance and in part:

Park: Hello.  
Song: How are you, Mr. President? This is Daniel.  
Park: Yes, Mr. President, yes.  
Song: The Amex card, can we run it for \$5,000?  
Park: Amex, \$5,000.  
Song: What?  
Park: Mr. President, no machine can run an Amex card for \$5,000 with one swipe.  
Song: Haha. Is that so?  
Park: Yes.  
Song: Can it be done in two swipes?  
Park: In two swipes? Give me a minute. Just a minute. Please wait a minute.  
Song: Okay.  
Park: Yes, sir. It is possible to do it in two swipes.  
Song: Is that right? When can I bring it over? Now?  
Park: That's fine. Okay.  
Song: I'm coming over now.  
Park: Okay  
Song: Okay.

Your Affiant believes that during this conversation, defendants Sang-Hyun Park and Hyo-Il Song were discussing "busting out" (*i.e.*, "swiping") an American Express credit card. During the investigation, it was determined that defendant Sang-Hyun Park maintains credit card machines at his offices for the purpose of fraudulently charging fraudulently acquired credit cards.

e. According to financial records related to "90 You and Me," approximately \$78,000 in deposits were made into this entity's account.

108. Defendant Edward M. Ha

a. On or about October 2, 2009, over the First Park Facility, defendant Sang-Hyun Park received an incoming telephone call from defendant Matthew J. Kang. During this intercepted conversation, defendant Matthew J. Kang stated that a card was swiped for \$1,700 at an "accountant's office . . . . 730 Grand Ave., it's Ridgefield, Ridgefield. . . . the [customer] is saying in way that it was a tax payment, for a payment."

b. On or about March 28, 2010, a law enforcement officer conducted surveillance at 730 Grand Avenue, Ridgefield, New Jersey. This surveillance revealed that defendant Edward M. Ha, a certified public accountant, maintains a suite at this location.

c. On or about November 11, 2009, over the First Park Facility, defendant Sang-Hyun Park made an outgoing telephone call to defendant Matthew J. Kang. During this intercepted conversation, defendant Sang-Hyun Park placed defendant Hyun-Jin LNU on the phone, and she spoke with defendant Matthew J. Kang. Defendant Hyun-Jin LNU stated, "Earlier, you included one additional person . . . . Chunyu An . . . . You didn't give this person's credit card information." Defendant Matthew J. Kang then provided the information.

d. According to records from Macy's/Bloomingdale's, at least two credit cards were issued to an individual using the name Chunyu An, a 586 social security number, an Nevada driver's license [later determined to be counterfeit], and an address belonging to defendant Matthew J. Kang. According to these records, these two credit card were used to conduct the following transactions:

Date	Amount	Transaction Information
January 5, 2010	\$2,000	Edward M. Ha, CPA
January 20, 2010	\$7,000	Edward M. Ha, CPA
January 20, 2010	\$5,500	Edward M. Ha, CPA

e. According to records from Macy's/Bloomingdale's, the following charges were made on other credit cards associated with Chinese names, corresponding 586 social security numbers, and counterfeit Nevada driver's licenses, through defendant Edward M. Ha's business:

Date	Amount	Transaction Information
October 30, 2009	\$6,000	Edward M. Ha, CPA
January 11, 2010	\$3,000	Edward M. Ha, CPA
January 11, 2010	\$2,500	Edward M. Ha, CPA
January 11, 2010	\$3,500	Edward M. Ha, CPA
January 21, 2010	\$7,300	Edward M. Ha, CPA

f. According to records from Citibank, the following charges were made on other credit cards associated with Chinese names, corresponding 586 social security numbers, and counterfeit Nevada driver's licenses, through defendant Edward M. Ha's business (except as described below):

Date	Amount	Transaction Information
September 25, 2009	\$20,000	Edward M. Ha, CPA
October 5, 2009	\$4,800	Edward M. Ha, CPA
October 16, 2009	\$8,500	Edward M. Ha, CPA (corresponding to a credit card issued to defendant Hyo-Il Song, which credit card was "busted out")

g. According to records from TD Bank, the following charges were made TD Bank credit cards issued to Chinese names and corresponding 586 social security number, as follows:

Date	Amount	Transaction Information
February 9, 2010	\$2,500	Edward M. Ha, CPA
February 17, 2010	\$8,500	Edward M. Ha, CPA
March 3, 2010	\$5,000	Edward M. Ha, CPA

h. All of the credit cards used to conduct the transactions described above at defendant Edward H. Ha's business were "busted out."

i. Based on the above, Your Affiant submits that defendant Edward M. Ha is a collusive merchant who used his accounting business' credit card machine to engage in "kkang."

**109. FNU LNU#1 (a/k/a "Xijun Gu")**

a. According to records from a merchant bank, defendant FNU LNU#1, using the Chinese name Xijun Gu, a corresponding 586 social number, and a business address (i.e., the Bergen Boulevard Office) formerly used by defendant FNU LNU#1 and defendant Sang Hyun-Park (as determined by surveillance), applied for and obtained a merchant bank account in the name of "For Your Joy." On this application, defendant FNU LNU#1 represented that his business was a clothing wholesale business located at the Bergen Boulevard Office. Cooperating Witness One entered this office on several occasions and never observed any evidence of a clothing business. Furthermore, according to these records, defendant FNU LNU#1 used Cocoxu (defendant Sang-Hyun Park's shell company) as a reference.

b. According to financial records related to "For Your Joy," from in or about April 2009 through in or about March 2010, approximately \$363,000 in deposits were made into this entity's account.

**The Scheme to Defraud the United States-Internal Revenue Service**

110. On or about April 8, 2010, a Form 1040 EZ, Individual Income Tax Return, was electronically filed with the Internal Revenue Service in the name of Jian F. Jiang, with a corresponding 586 social security number. This name and social security number were used by defendant Sang-Hyun Park to obtain an Illinois identification card, as described in Paragraph 51 above. This return claimed a tax refund of approximately \$3,258. The electronically filed return was accompanied by a Form W-2, claiming that Jian F Jiang was employed by Ameth Thread, located in Palisades Park, New Jersey, a company incorporated by defendant Sang-Hyun Park. Furthermore, federal agents traced the Internet Provider address (hereinafter "IP address") related to this return, and, according to the Service Provider, the subscriber of that IP address was defendant Sang-Hyun Park, using an address of an apartment in Flushing, New York (hereinafter the "Flushing Address"). The Internal Revenue Service determined that the return was filed from the Flushing Address. The Internal Revenue Service did not pay this refund. Furthermore, According to the Internal Revenue Service, in 2010, several other Forms 1040 EZ were electronically filed or transmitted from the Flushing Address, using same IP address traceable to defendant Sang-Hyun Park. Each return claimed a refund and was filed with a name corresponding to a 586 social security number, as follows:

Approximate Date Return Filed	Name and SSN on Return	Defendant Associated with Identity	Amount Claimed/Received	Purported Employer
March 6, 2010	Zhanhong Fan 586 SSN	Sung-Sil Joh	\$1,904 \$1,829.19	Big Buy Enterprise, Inc., Little Ferry, NJ
April 8, 2010	Ping Fang 586 SSN	In-Sook Lee	\$2,996 \$2,996	Image Nail Spa, Inc., Cliffside Park, NJ
April 8, 2010	Hong Y. Xu 586 SSN	unknown	\$3,258 \$0	500 Joker Billiard LLC, Palisades Park, NJ

Approximate Date Return Filed	Name and SSN on Return	Defendant Associated with Identity	Amount Claimed/Received	Purported Employer
April 13, 2010	Guizhen Guo 586 SSN	unknown	\$3,616 \$0	Blue Star Meat Corp., Bronx, NY
April 13, 2010	Shan J. Jin 586 SSN	unknown	\$3,473 \$0	Blue Star Meat Corp., Bronx, NY

111. According to financial records pertaining to the above-referenced electronically filed tax returns, the purported tax payer elected to have the refunds electronically deposited into prepaid card accounts, which accounts are similar to gift cards. These prepaid card accounts were mailed to addresses located in New York different that the address reported on the tax return.

112. According to the Internal Revenue Service, in 2010, several other Forms 1040 EZ were electronically filed or transmitted to the Internal Revenue Service. Each return claimed a refund and was filed with a name corresponding to a 586 social security number, as follows:

Approximate Date Return Filed	Name and SSN on Return	Defendant Associated with Identity	Amount Claimed/Received	Purported Employer
January 21, 2010	Longnan Cui 586 SSN	Myung-Kyun Ko	\$9,404 \$0	Jasper Enterprises, Long Island City, NY
January 22, 2010	Zhen S. An (Zhengshu An) 586 SSN	Jong-Hoon Kim	\$8,300 \$0	Harrahs Entertainment, Inc.
January 27, 2010	Mingyu Jin 586 SSN	Sang-Hyun Park and Hye-Won Jung	\$9,625 \$0	MGM Mirage, Las Vegas, NV

Approximate Date Return Filed	Name and SSN on Return	Defendant Associated with Identity	Amount Claimed/Received	Purported Employer
February 2, 2010	Zhaofang Chen  586 SSN	Jin LNU, a/k/a "Jin"	\$8,931 \$0	Dover Downs Gaming Entertainment, Dover, DE
February 3, 2010	Wei Xiang Lu 586 SSN	Jung-Bong Lee	\$8,985 \$8,985	Eastman Kodak, Rochester, NY
February 11, 2010	Zhankun Liu  586 SSN	Dong-Il Kim	\$6,040 \$0	Home Depot, Atlanta, GE
February 18, 2010	Shanji Li	Hyun-Yop Sung	\$8,944 \$0	Mohegan Tribal Gaming Authority, Uncasville, CT
February 19, 2010	Ming H. Li  586 SSN	Hyo-Il Song	\$9,916 \$0	Signal Enterprise Corp., Valley Stream, New York
March 26, 2010 (Tax return e-filed from an IP address located at an address in Bayside, New York used by defendant Young Woo Jo, a/k/a "Fei Chen")	Cheng Y. Ma	unknown	\$3,303 \$3,303	Ameth Thread, Palisades Park, NJ



Approximate Date Return Filed	Name and SSN on Return	Defendant Associated with Identity	Amount Claimed/Received	Purported Employer
April 10, 2010  (Tax return e-filed from an IP address located at an address in Bayside, New York used by defendant Young Woo Jo, a/k/a "Fei Chen")	Haishun Jin  586 SSN	Jung-Sook Ko, a/k/a "Grace S. Lim"	\$3,303 \$0	Ameth Thread, Palisades Park, NJ
April 23, 2010	Xianzi Luo	Chi-Won Jeon	\$8,331 \$0	n/a

113. According to the Internal Revenue Service, in 2008, several Forms 1040 EZ were electronically filed or transmitted to the Internal Revenue Service. Each return claimed a refund and was filed with a name corresponding to a 586 social security number, as follows:

Approximate Date Return Filed	Name and SSN on Return	Defendant Associated with Identity	Amount Claimed/Received	Purported Employer
October 7, 2009	Zhanhong Fan  586 SSN	Sung-Sil Joh	\$6,937 \$6,937	Trump Entertainment Resort, Atlantic City, NJ
October 11, 2009	Guizhen Guo  586 SSN	unknown	\$9,314 \$9,314	New Simbal Corp., Bronx, NY

Approximate Date Return Filed	Name and SSN on Return	Defendant Associated with Identity	Amount Claimed/Received	Purported Employer
October 15, 2009	Shanji Li  586 SSN	Hyun-Yop Sung	\$8,967 \$8,967	Mohegan Tribal Gaming Authority, Uncasville, CT

**Conclusion**

114. In total, the Park Criminal Enterprise and its co-conspirators caused millions of dollars in financial losses to the United States and banks, credit card companies, lenders, and others.