

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
v. : Criminal No.: 11-  
CHUL-HOE CHOI : Title 18, United States Code,  
Sections 1028, 1028A, 1349,  
and 2

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT ONE  
(Unlawfully Producing an Identity Document)

Introduction

1. At all times relevant to this Information:
  - a. Defendant CHUL-HOE CHOI, a resident of Little Ferry, New Jersey, was the principal of For Your Joy, LLC (hereinafter "For Your Joy") and Nora Universal, LLC (hereinafter "Nora Universal"), wholly fictitious companies.
  - b. Co-Conspirator S.H.P., an individual not named as a defendant herein, operated a criminal enterprise in Bergen County, New Jersey (hereinafter the "Criminal Enterprise") that engaged in identity theft and various types of fraud.

## Overview of the Criminal Enterprise

2. The Criminal Enterprise fraudulently obtained and sold social security cards to customers. These social security cards began with the prefix "586," which prefix the United States government typically used on social security cards issued to individuals, usually from China, who worked in American territories. The Criminal Enterprise and the customer then used the "586" social security cards either to obtain a genuine but fraudulently issued driver's license or produce a counterfeit driver's license (hereinafter collectively the "Fraudulent Identity").

3. After providing the Fraudulent Identity to the customer, the Criminal Enterprise engaged in the fraudulent "build up" of the credit score associated with that identity. This "credit build up" was accomplished by taking the Fraudulent Identity and attaching it to other co-conspirators' credit card accounts. By attaching the Fraudulent Identity to these credit card accounts, the Fraudulent Identity obtained a perfect or near perfect credit score. The Criminal Enterprise charged the customer a fee of between approximately \$5,000 and \$7,000 for the Fraudulent Identity and the corresponding credit build up.

4. Thereafter, the Criminal Enterprise directed, coached, and assisted the customer to use the Fraudulent Identity to open bank accounts and apply for loans and credit cards. The

Criminal Enterprise and the customer then profited by using the fraudulently obtained credit cards to obtain merchandise, money, and other things of value.

5. To obtain cash from the fraudulently obtained credit cards, the Criminal Enterprise charged or "swiped" these 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 Collusive Merchants or members of the Criminal Enterprise and shared among the various co-conspirators.

6. On or about January 12, 2009, defendant CHUL-HOE CHOI and other members of the Criminal Enterprise traveled from Bergen County, New Jersey to Chicago, Illinois. Thereafter, defendant CHUL-HOE CHOI used and presented to the Illinois Department of Vehicle Services (hereinafter "IDVS") a "586" social security number in the name of an individual with the initials "X.J.G.," an actual person, a fictitious Chinese passport in the name of X.J.G., and other false documents, thereby causing the IDVS to produce and issue an Illinois driver's license to defendant CHUL-HOE CHOI in the name of X.J.G. (hereinafter the "X.J.G Identity"). Thereafter, defendant CHUL-HOE CHOI returned to Bergen County, New Jersey with this fraudulently obtained Illinois driver's license.

7. Beginning in or about January 2009, defendant CHUL-HOE CHOI used the X.J.G Identity to apply for and obtain credit cards from various banks and stores. Thereafter, defendant CHUL-HOE CHOI used these fraudulently obtained credit cards to obtain in excess of \$70,000 in merchandise and cash.

The Charge

8. On or about January 12, 2009, in Bergen County, in the District of New Jersey and elsewhere, defendant

CHUL-HOE CHOI

knowingly and without lawful authority produced, and caused to be produced, an identification document, namely, an Illinois driver's license issued by the Illinois Department of Vehicle Services, as described in Paragraph 6 of Count One of this Information, in and affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1028(a)(1), 1028(b)(1)(A)(ii), and 1028(c)(3)(A) and Section 2.

COUNT TWO  
(Aggravated Identity Theft)

1. The allegations set forth in Paragraphs 1 through 7 of Count One of this Information are hereby realleged as if fully set forth herein.

The Charge

2. From in or about January 2009 through in or about July 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant

CHUL-HOE CHOI

knowingly transferred, possessed, and used, without lawful authority, the means of identification of another person, namely, X.J.G, during and in relation to violations of federal law, namely, credit card fraud (18 U.S.C. § 1029) and fraud relating to social security cards and numbers (42 U.S.C. § 408).

In violation of Title 18, United States Code, Section 1028A and Section 2.

COUNT THREE  
(Conspiracy to Commit Wire Fraud)

1. The allegations set forth in Paragraphs 1 through 7 of Count One of this Information are hereby realleged as if fully set forth herein.

2. At all times relevant to Count Three of this Information:

a. Various financial institutions and retail stores issued card cards to consumers (hereinafter the "Corporate Victims").

b. Defendant CHUL-HOE CHOI was a Collusive Merchant for the Criminal Enterprise.

The Conspiracy

3. From in or about January 2009 through in or about July 2010, in Bergen County, in the District of New Jersey, and elsewhere, defendant

CHUL-HOE CHOI

knowingly and intentionally conspired and agreed with S.H.P. and others to devise a scheme and artifice to defraud the Corporate Victims, and to obtain money and property, by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice to defraud, to transmit and cause to be transmitted, by means of wire communication in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, contrary to Title 18, United States Code, Section 1343.

Object of the Conspiracy

4. The object of the conspiracy was for defendant CHUL-HOE CHOI, Co-Conspirator S.H.P., and their co-conspirators to enrich themselves by fraudulently obtaining in excess of \$600,000 from the Corporate Victims to which they were not entitled.

Manner and Means of the Conspiracy

5. It was part of the conspiracy that defendant CHUL-HOE CHOI, using the X.J.G Identity, established merchant bank accounts at two financial institutions for For Your Joy and Nora Universal, two fictitious companies that neither sold products nor provided any services. After opening these merchant accounts, defendant CHUL-HOE CHOI received credit card machines to make and process credit card purchases.

6. It was further part of the conspiracy that Co-Conspirator S.H.P. and other members of the Criminal Enterprise provided fraudulently obtained credit cards and credit card numbers to defendant CHUL-HOE CHOI. These credit cards were obtained by the Criminal Enterprise, as described in Paragraphs 2 through 4 above of Count One of this Information.

7. It was further part of the conspiracy that defendant CHUL-HOE CHOI charged these fraudulently obtained credit cards through his merchant bank accounts with For Your Joy and Nora Universal.

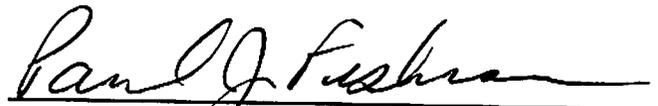
8. It was further part of the conspiracy that, after funds from these fraudulent credit card transactions were electronically wired and deposited into his merchant bank accounts with For Your Joy and Nora Universal, defendant CHUL-HOE CHOI withdrew cash from these accounts and issued checks drawn on these accounts to himself and his co-conspirators, including Co-Conspirator S.H.P.

9. In furtherance of the conspiracy and to effect the unlawful object thereof, defendant CHUL-HOE CHOI and his co-conspirators committed and caused to be committed the following acts:

a. On or about May 18, 2009, in Bergen County, New Jersey, defendant CHUL-HOE CHOI made an electronic credit card charge through For Your Joy, in the approximate amount of \$4,810, with a fraudulently obtained Bank of America credit card.

b. On or about June 19, 2009, in Bergen County, New Jersey, defendant CHUL-HOE CHOI made an electronic credit card charge through For Your Joy, in the approximate amount of \$5,625, with a fraudulently obtained Bloomingdale's credit card.

All in violation of Title 18, United States Code, Section 1349.

  
PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: \_\_\_\_\_

**United States District Court  
District of New Jersey**

**UNITED STATES OF AMERICA**

**v.**

**CHUL-HOE CHOI**

**INFORMATION FOR**

**Title 18, United States Code, Sections 1028, 1028A, 1349, and 2**

**PAUL J. FISHMAN**  
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