

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
v. : Criminal No.: 11-  
JONG-KWAN HONG : Title 18, United States Code,  
Section 371

I N F O R M A T I O N

(Conspiracy to Unlawfully Produce a False Identification  
Document and to Commit Credit Card Fraud)

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

Introduction

1. At all times relevant to this Information:
  - a. Defendant JONG-KWAN HONG was a resident of Westbury, New York.
  - 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.

The Conspiracy

5. From in or around September 2007 through on or about September 15, 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant

JONG-KWAN HONG

knowingly and intentionally conspired and agreed with S.H.P. and others to commit offenses against the United States, namely:

(a) unlawfully producing a false identification document in and affecting interstate commerce, contrary to Title 18, United States Code, Sections 1028(a)(1) and 1028(c)(3)(A); and

(b) using, with intent to defraud, one or more unauthorized access devices during a one year period for the purpose of obtaining things of value of \$1,000 or more, contrary to Title 18, United States Code, Section 1029(a)(2).

Objects of the Conspiracy

6. The objects of the conspiracy were for defendant JONG-KWAN HONG and his co-conspirators to unlawfully enrich themselves by: (a) unlawfully producing a counterfeit driver's license; and (b) using a counterfeit driver's license to obtain credits cards for the purpose of obtaining merchandise, money, and other things of value to which they were not entitled.

Manner and Means of the Conspiracy

7. It was part of the conspiracy that defendant JONG-KWAN HONG purchased and obtained from Co-Conspirator S.H.P. a "586" social security card in the name of an individual with the initials D.L. and a corresponding counterfeit driver's license, purportedly issued by the State of Nevada (hereinafter the "D.L. Identity").

8. It was further part of the conspiracy that the Criminal Enterprise fraudulently "built-up" the credit score related to D.L. Identity.

9. It was further part of the conspiracy that defendant JONG-KWAN HONG and members of the Criminal Enterprise used the D.L. Identity to fraudulently open bank accounts and obtain credit cards. In total, the Criminal Enterprise and defendant JONG-KWAN HONG caused losses in excess of \$28,000 to various banks, lenders, and credit card companies as a result of their scheme.

Overt Acts

10. In furtherance of the conspiracy and in order to effect the objects thereof, defendant JONG-KWAN HONG and his co-conspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. In or about September 2009, defendant JONG-KWAN HONG obtained a counterfeit driver's license, purportedly issued by the State of Nevada, from Co-Conspirator S.H.P.

b. On or about December 21, 2009, Co-Conspirator S.H.P. directed defendant JONG-KWAN HONG to apply for credit cards using the D.L. Identity.

c. On or about December 21, 2009, defendant JONG-KWAN HONG, using the D.L. Identity, applied for credit cards at a financial institution in Bergen County, New Jersey.

All in violation of Title 18, United States Code, Section 371.

  
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PAUL J. FISHMAN  
United States Attorney

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

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**INFORMATION FOR**

**Title 18, United States Code, Section 371**

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**PAUL J. FISHMAN**

*U.S. ATTORNEY NEWARK, NEW JERSEY*

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