

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.  
v. : Criminal No.: 11-  
: Title 18, United States Code,  
JUNG-SOOK KO, : Sections 371, 1028A, and 2  
a/k/a "Grace Lim"

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

(Conspiracy to Unlawfully Produce Identification Documents and to Commit Credit Card Fraud)

Introduction

1. At all times relevant to this Information:

a. Defendant JUNG-SOOK KO, a/k/a "Grace Lim," was a resident of Ridgefield, New Jersey.

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 January 2009 through on or about September 15, 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant

JUNG-SOOK KO,  
a/k/a "Grace Lim,"

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

(a) unlawfully producing identification documents, 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 JUNG-SOOK KO, a/k/a "Grace Lim," and her co-conspirators to unlawfully enrich themselves by: (a) unlawfully producing Fraudulent Identities; and (b) using the Fraudulent Identities to obtain credit 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 JUNG-SOOK KO, a/k/a "Grace Lim," purchased and obtained from Co-Conspirator S.H.P. a "586" social security cards in the name of an individual with the initials H.J., an actual person (hereinafter the "H.J. Identity").

8. It was further part of the conspiracy that defendant JUNG-SOOK KO, a/k/a "Grace Lim," used the H.J. Identity to obtain a genuine but fraudulently issued identification card and a driver's license, both in the name of H.J.

9. It was further part of the conspiracy that the Criminal Enterprise fraudulently "built-up" the credit score related to the H.J. Identity.

10. It was further part of the conspiracy that defendant JUNG-SOOK KO, a/k/a "Grace Lim," used the H.J. Identity to open bank accounts and obtain loans and credit cards in those identities. In total, defendant JUNG-SOOK KO, a/k/a "Grace Lim," and her co-conspirators caused losses in excess of \$120,000 to various banks, lenders, and credit card companies as a result of their scheme.

Overt Acts

11. In furtherance of the conspiracy and in order to effect the objects thereof, defendant JUNG-SOOK KO, a/k/a "Grace Lim," and her co-conspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. On or about January 20, 2009, defendant JUNG-SOOK KO, a/k/a "Grace Lim," traveled from Bergen County, New Jersey to Illinois and obtained an identification card in the name of H.J. from the Illinois Department of Vehicle Services.

b. On or about January 20, 2009, defendant JUNG-SOOK KO, a/k/a "Grace Lim," traveled from Bergen County, New Jersey to Illinois and obtained a driver's license in the name of H.J. from the Illinois Department of Vehicle Services.

c. In or around February 2010, defendant JUNG-SOOK KO, a/k/a "Grace Lim," used the H.J. Identity to apply for and obtain credit cards from Macy's, Bloomingdale's, Saks Fifth Avenue, Nordstrom, Citibank, Chase, Bank of America, and HSBC.

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

COUNT TWO  
(Aggravated Identity Theft)

1. The allegations set forth in Paragraphs 1 through 4 and Paragraphs 6 through 11 of Count One of this Information are hereby realleged as if fully set forth herein.

The Charge

2. From in or around January 2009 through on or about September 15, 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant

JUNG-SOOK KO,  
a/k/a "Grace Lim,"

knowingly transferred, possessed, and used, without lawful authority, the means of identification of another person, namely, H.J., during and in relation to violations of federal law, namely, unlawfully producing identification documents (18 U.S.C. § 1028(a)(1)) and credit card fraud (18 U.S.C. § 1029).

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

  
\_\_\_\_\_  
PAUL J. FISHMAN  
United States Attorney

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

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

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UNITED STATES OF AMERICA

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JUNG-SOOK KO,  
a/k/a "Grace Lim"

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**INFORMATION FOR**

Title 18, United States Code, Sections 371, 1028A, and 2

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**PAUL J. FISHMAN**  
*U.S. ATTORNEY NEWARK, NEW JERSEY*

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