

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No.: 11-
IN-SOOK LEE : 18 U.S.C. § 371

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 IN-SOOK LEE was a resident of Bergen County, 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 February 2008 through on or about September 15, 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant

IN-SOOK LEE

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 IN-SOOK LEE and her co-conspirators to unlawfully enrich themselves by: (a) unlawfully producing Fraudulent Identities; and (b) using the Fraudulent Identities 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 IN-SOOK LEE purchased and obtained from Co-Conspirator S.H.P. a "586" social security card in the name of an individual with the initials P.F. who was an actual person.

8. It was further part of the conspiracy that defendant IN-SOOK LEE used the P.F. identity to obtain genuine but fraudulently issued driver's licenses.

9. It was further part of the conspiracy that the Criminal Enterprise fraudulently "built-up" the credit score related to the P.F. identity.

10. It was further part of the conspiracy that defendant IN-SOOK LEE and members of the Criminal Enterprise used the P.F. identity to open bank accounts and obtain loans and credit cards in those identities.

Overt Acts


11. In furtherance of the conspiracy and in order to effect the objects thereof, defendant IN-SOOK LEE 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 February 25, 2008, defendant IN-SOOK LEE obtained a driver's license from the Illinois Department of Vehicle Services in the name of P.F.

b. In or around April 2010, defendant IN-SOOK LEE applied for and obtained a credit card from Walmart under the name P.F.

c. Between in or around April 2010 and in or around June 2010, defendant IN-SOOK LEE charged approximately \$1,000 to a Walmart credit card in the name P.F.

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



PAUL J. FISHMAN
United States Attorney

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INFORMATION FOR

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