

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
v.	:	Criminal Number: 12-
HONG G. CHO	:	Title 18, United States Code, Section 1349

I N F O R M A T I O N

(Conspiracy to Commit Bank Fraud)

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

Background

1. At times relevant to this Information:

The Defendant and Other Parties

a. Defendant HONG G. CHO was a resident of Bergen County, New Jersey and the principal of JJ Auto Accessories (hereinafter "JJ Auto Accessories"), a wholly fictitious company.

b. Co-Conspirator C.O.K., an individual not named as a defendant herein, was a loan broker and the principal of CB Development Company (hereinafter "CB Development"), a wholly fictitious company.

c. Each bank referenced in this Information was a "financial institution," as that term is defined in Title 18, United States Code, Section 20.

The Conspiracy

2. From in or around mid-2007 through in or around late 2007, in Bergen County, in the District of New Jersey and elsewhere, defendant

HONG G. CHO

knowingly and intentionally conspired and agreed with Co-Conspirator C.O.K. and others to execute a scheme and artifice to defraud financial institutions, and to obtain money, funds, or assets owned by and under the custody and control thereof, by means of false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

Object of the Conspiracy

3. The object of the conspiracy was for defendant HONG G. CHO, Co-Conspirator C.O.K., and their co-conspirators to enrich themselves by fraudulently obtaining in excess of \$200,000 in lines of credit and commercial loans to which they were not entitled.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendant HONG G. CHO and Co-Conspirator C.O.K. applied for lines of credit and commercial loans on behalf of JJ Auto Accessories, a fictitious company.

5. It was further part of the conspiracy that defendant HONG G. CHO and Co-Conspirator C.O.K. prepared and submitted to financial institutions false loan applications and fabricated

bank statements and financial records, federal income tax returns, and other documents.

6. It was further part of the conspiracy that defendant HONG G. CHO used the proceeds of the fraudulently obtained lines of credit and commercial loans for personal expenses.

7. In furtherance of the conspiracy and to effect the unlawful object thereof, defendant HONG G. CHO and his co-conspirators committed and caused to be committed the following acts:

a. In and about March 2007, defendant HONG G. CHO caused a loan application, on behalf of JJ Auto Accessories, to be submitted to TD Bank, located in Bergen County, New Jersey. This loan application falsely stated that defendant HONG G. CHO's wife owned the business, and that the business' income in 2006 was \$419,016. Based on defendant HONG G. CHO's false representations, TD Bank issued a commercial loan in the approximate amount of \$50,000.

b. In and around March 2007, defendant HONG G. CHO caused a loan application, on behalf of JJ Auto Accessories, to be submitted to PNC Bank, located in Bergen County, New Jersey. This loan application falsely stated that defendant HONG G. CHO's wife owned the business, and that the business' annual sales in 2006 had been \$700,000. Based on defendant HONG G. CHO's false representations, PNC Bank issued a commercial loan in the approximate amount of \$50,000.

c. . In or around May 2007, defendant HONG G. CHO fraudulently obtained a \$15,000 commercial loan from Citibank, located in Bergen County, New Jersey.

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.

HONG G. CHO

INFORMATION FOR

Title 18, United States Code, Section 1349

PAUL J. FISHMAN

U.S. ATTORNEY NEWARK, NEW JERSEY

ANTHONY MOSCATO

ASSISTANT U.S. ATTORNEY

NEWARK, NEW JERSEY

973-645-2752
