

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No.: 12-
SANG-HYUN PARK, : Title 18, United States Code,
a/k/a "Jimmy" : Sections 371, 1028A, 1349,
1956, 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

(Conspiracy to Unlawfully Produce Identity Documents
and False Identification Documents)

Introduction

1. At all times relevant to this Information:
 - a. A criminal enterprise operated in Bergen County, New Jersey and elsewhere that engaged in identity theft and financial fraud (hereinafter the "Criminal Enterprise").
 - b. Defendant SANG-HYUN PARK, a/k/a "Jimmy," a resident of Palisades Park, New Jersey, was the leader of the Criminal Enterprise. Defendant SANG-HYUN PARK, a/k/a "Jimmy," was also the principal owner and operator of several fictitious shell companies, including Samsung Consulting/Top Consulting (hereinafter "Samsung Consulting"), Moja Trading Inc. (hereinafter "Moja"), Cocoxu Corporation (hereinafter "Cocoxu"), Li Nail Plus, Inc., d/b/a "Li Nails" and "Nails Plus"

(hereinafter "Li Nails"), Ameth Thread Trading, Inc. (hereinafter "Ameth Thread"), and Mono Corporation (hereinafter "Mono Corp.").

c. Co-Conspirator H.J.Y. was the second-in-command of the Criminal Enterprise.

d. Co-Conspirator D.I.K. was a member of the Criminal Enterprise.

e. Co-Conspirator S.S.J. was a member of the Criminal Enterprise.

f. Co-Conspirator O.K. was a member of the Criminal Enterprise.

g. Co-Conspirator Y.H.J. was an illegal document broker who provided genuinely issued social security cards and counterfeit driver's licenses to the Criminal Enterprise's customers.

h. Co-Conspirator H.I.S. was an illegal document broker who obtained and sold to the Criminal Enterprise genuinely issued social security cards and counterfeit driver's licenses. Co-Conspirator H.I.S. was also the principal owner and operator of 153 Samsung DC, Inc. (hereinafter "153 Samsung DC") and 90 You & Me Corporation (hereinafter "90 You and Me"), fictitious shell companies.

i. Co-Conspirator D.W.K. was an illegal document broker who obtained and sold to the Criminal Enterprise genuinely issued social security cards.

j. Co-Conspirator S.H.N. was an illegal document broker who made and sold to the Criminal Enterprise counterfeit driver's licenses.

k. Co-Conspirator R.S.K. was a principal owner and operator of Shin Yong Consulting, LLC, d/b/a "Shin Hwa Consulting" (hereinafter "Shin Hwa"), a purported financial consulting business. Co-Conspirator R.S.K. engaged in the fraudulent "build up" of credit scores and credit histories, as described below.

l. Co-Conspirator H.S.C. was a principal owner and operator of Shin Hwa and a partner with Co-Conspirator R.S.K. Co-Conspirator H.S.C., engaged in the fraudulent "build up" of credit scores and credit histories, as described below.

m. Co-Conspirator M.J.K. engaged in the fraudulent "build up" of credit scores and credit histories, as described below.

n. Co-Conspirator Y.W.J. engaged in the fraudulent "build up" of credit scores and credit histories, as described below.

o. Financial institutions provided members of the public with banking and financial services, including establishing check and savings accounts and issuing credit and debit cards, lines of credit and loans, and various companies and retail stores issued card cards to customers (hereinafter collectively the "Corporate Victims").

Overview of the Criminal Enterprise

Fraudulently Obtaining, Selling, and Producing Genuine and Counterfeit Identity Documents

2. Defendant SANG-HYUN PARK, a/k/a "Jimmy," advertised in local Korean newspapers in Bergen County, New Jersey and elsewhere, representing that he could obtain driver's licenses, credit cards, and money for others.

3. In exchange for cash, the Criminal Enterprise fraudulently obtained and sold social security cards to customers (hereinafter "Customer" or "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 its Customers, who were primarily of Korean ethnicity, used the 586 social security cards, bearing the names of individuals of Chinese ethnicity, together with counterfeit Chinese passports and other fictitious documents, either to obtain genuine but fraudulently issued identity documents, such as identity cards and driver's licenses, or to produce counterfeit driver's licenses (hereinafter collectively the "Fraudulent Identity" or "Fraudulent Identities").

The Fraudulent Credit Build Up Phase

4. Because the Fraudulent Identities had no corresponding credit histories or credit scores, the Criminal Enterprise engaged in the fraudulent "build up" of the credit scores and the creation of bogus credit histories for these identities. This credit "build up" was accomplished by various co-conspirators of the Criminal Enterprise, referred to as "Build Up Teams." These Build Up Teams, knowing the Fraudulent Identities would be used to commit financial fraud, attached the Fraudulently Identities (e.g., Chinese names, 586 social security numbers, and dates of birth) to the Build Up Teams personal credit card accounts, or the credit card accounts of others, such as family members and friends. By attaching the Fraudulent Identities to these credit card accounts, the Build Up Teams fraudulently established credit histories and obtained perfect or near perfect credit scores for the Fraudulent Identities. As part of this build up process, the Build Up Teams made false representations to companies issuing credit cards, such as providing false addresses for the Fraudulent Identities. The Corporate Victims relied on these credit histories and scores when deciding whether or not to issue credit cards, loans, or other forms of credit to prospective applicants and to ensure the bona fides of the applicants.

5. The Criminal Enterprise charged Customers a fee of between approximately \$5,000 and \$7,000 for each Fraudulent Identity and corresponding credit build up, and the Criminal Enterprise paid cash to the Build Up Teams for each Fraudulent Identity attached to a credit card account.

Credit Card Bust-Out ("Kkang") and Bank Fraud ("Check Jobs")

6. After providing the Customer with a Fraudulent Identity with a perfect or near perfect credit score, the Criminal Enterprise directed, coached, and assisted the Customers to use the Fraudulent Identities to open bank accounts (hereinafter the "Fraudulent Bank Accounts") and to apply for credit cards, loans, and other forms of financing for the purpose of committing fraud.

Credit Card Bust Out ("Kkang")

7. To obtain cash, the Criminal Enterprise charged or "swiped" the fraudulently obtained credit cards through credit card terminals possessed by wholly fictitious shell companies or other merchants (hereinafter "Collusive Merchants"). After the funds from these charges were electronically wired into bank accounts controlled by the Collusive Merchants, the cash was withdrawn and shared among the various co-conspirators, including the Customers. In other instances, members of the Criminal Enterprise, together with the Customers, used the fraudulently obtained credit cards to purchase high-end merchandise and to obtain gift cards. After making these credit card charges, the

Criminal Enterprise used the Fraudulent Bank Accounts to make payments toward these credit card charges. These payments, however, were sham payments made with insufficient funds. After the Corporate Victims received these payments but before discovering the fraudulent nature of the payments, the Corporate Victims credited the credit card accounts, thereby allowing members of the Criminal Enterprise to make additional charges on these fraudulently obtained credit cards. Members of the Criminal Enterprise referred to this practice as "kkang."

Bank Fraud ("Check Jobs")

8. The Criminal Enterprise also profited through bank fraud. Members of the Criminal Enterprise wrote hundreds of worthless checks drawn on Fraudulent Bank Accounts. These worthless checks were then negotiated at banks and mailed and given to other co-conspirators. These co-conspirators, who were often in others states with different time zones, deposited these worthless checks into other Fraudulent Bank Accounts. Thereafter, members of the Criminal Enterprise located in Bergen County, New Jersey and elsewhere, withdrew, and attempted to withdraw, money from these accounts before the banks determined that the checks were fraudulent. Members of the Criminal Enterprise referred to this practice as "check jobs."

The Conspiracy

9. From in or about June 2006 through on or about September 15, 2010, in Bergen County, in the District of New Jersey, and elsewhere, defendant

SANG-HYUN PARK,
a/k/a "Jimmy,"

knowingly and intentionally conspired and agreed with Co-Conspirator H.J.Y., Co-Conspirator D.I.K., Co-Conspirator S.S.J., Co-Conspirator O.K., Co-Conspirator Y.H.J., Co-Conspirator H.I.S., Co-Conspirator D.W.K., Co-Conspirator S.H.N., Co-Conspirator R.S.K., Co-Conspirator M.J.K., Co-Conspirator Y.W.J., and others to commit an offense against the United States, namely, unlawfully producing identification documents and false identification documents, in and affecting interstate and foreign commerce, contrary to Title 18, United States Code, Sections 1028(a)(1) and 1028(c)(3)(A).

Object of the Conspiracy

10. The object of the conspiracy was for defendant SANG-HYUN PARK, a/k/a "Jimmy," and his co-conspirators to profit by unlawfully obtaining, transferring, and producing: (a) genuine but fraudulently issued identification cards and driver's licenses from various states; and (b) counterfeit driver's licenses.

Manner and Means of the Conspiracy

11. It was part of the conspiracy that defendant SANG-HYUN PARK, a/k/a "Jimmy," recruited Customers by advertising in Korean newspapers.

12. It was further part of the conspiracy that SANG-HYUN PARK, a/k/a "Jimmy," obtained and sold 586 social security cards to Customers, which social security cards defendant obtained from other co-conspirators, including Co-Conspirator Y.H.J., Co-Conspirator H.I.S., Co-Conspirator D.W.K., Co-Conspirator S.H.N., and others.

13. It was further part of the conspiracy that members of the Criminal Enterprise, at the direction of defendant SANG-HYUN PARK, a/k/a "Jimmy," escorted hundreds of Customers to various states, including Illinois, Pennsylvania, and Tennessee, to fraudulently obtain identification cards and driver's licenses by using the 586 social security cards and other fraudulent documents, such as altered Chinese passports.

14. It was further part of the conspiracy that defendant SANG-HYUN PARK, a/k/a "Jimmy," procured from various fraudulent document makers, including Co-Conspirator S.H.N., counterfeit driver's licenses and sold them to the Customers.

Overt Acts

15. In furtherance of the conspiracy and in order to effect the object thereof, defendant SANG-HYUN PARK, a/k/a "Jimmy," 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. On or about February 25, 2008, defendant SANG-HYUN PARK, a/k/a "Jimmy," using a 586 social security number belonging to a person with the initials J.J., an actual person, traveled from Bergen County, New Jersey to Illinois and fraudulently obtained an Illinois identification card in the name of J.J. (hereinafter the "J.J Identity").

b. On or about October 27, 2008, Co-Conspirator D.W.K. escorted Co-Conspirator S.S.J. from Bergen County, New Jersey to Chicago, Illinois for the purpose of fraudulently obtaining an identification card.

c. On or about January 26, 2009, in Bergen County, New Jersey, defendant SANG-HYUN PARK, a/k/a "Jimmy," received approximately \$3,500 in cash from a person whom he believed to be a Customer for the purchase of a 586 social security card and an Illinois identification card.

d. On or about April 8, 2009, in Bergen County, New Jersey, Co-Conspirator Y.H.J. received approximately \$2,000 in cash from a person whom she believed to be a Customer for the purchase of a 586 social security card and a counterfeit passport.

e. On or about July 21, 2009, during a telephone conversation, defendant SANG-HYUN PARK, a/k/a "Jimmy," agreed to charge Co-Conspirator Y.H.J. approximately \$1,100 in exchange for a counterfeit passport for a Customer.

f. On or about September 30, 2009, during a telephone conversation, defendant SANG-HYUN PARK, a/k/a "Jimmy," requested Co-Conspirator S.H.N. to manufacture a counterfeit driver's license for a Customer.

g. On or about October 16, 2009, during a telephone conversation, defendant SANG-HYUN PARK, a/k/a "Jimmy," agreed to buy three 586 social security cards from Co-Conspirator D.W.K. for approximately \$800 each.

h. On or about October 16, 2009, during a telephone conversation, defendant SANG-HYUN PARK, a/k/a "Jimmy," discussed selling three social security cards to Co-Conspirator M.J.K.

i. On or about November 10, 2009, Co-Conspirator S.H.N. traveled from New York to Bergen County, New Jersey and gave defendant SANG-HYUN PARK, a/k/a "Jimmy," a counterfeit driver's license.

j. In or around early 2010, Co-Conspirator S.S.J. purchased a counterfeit Nevada driver's license from defendant SANG-HYUN PARK, a/k/a "Jimmy," and Co-Conspirator S.H.N.

k. On or about January 26, 2010, Co-Conspirator D.I.K., using a 586 social security number, fraudulently obtained a California driver's license.

l. On or about April 26, 2010, during a telephone conversation, defendant SANG-HYUN PARK, a/k/a "Jimmy," sought to purchase two social security cards from Co-Conspirator D.W.K.

m. On or about April 10, 2010, in Bergen County, New Jersey, defendant SANG-HYUN PARK, a/k/a "Jimmy," and Co-Conspirator H.Y.J. received approximately \$7,000 in cash from a person whom they believed to be a Customer for the purchase of a 586 social security card and a counterfeit California driver's license.

n. On or about July 14, 2010, Co-Conspirator H.J.Y. told an undercover federal agent: "Listen, you gave me \$7,000 for that, build up, social, and driver's license are all included. . . . If you get unlucky and get caught somewhere, the easiest thing to do at that time is [to] just say that a Chinese person in Chinatown say you went to visit Chinatown and met someone and that person gave it to you."

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

COUNT TWO
(Conspiracy to Commit Wire Fraud Affecting
Financial Institutions and Bank Fraud)

1. The allegations set forth in Paragraphs 1 through 8 and 10 through 15 of Count One of this Information are hereby realleged as if fully set forth herein.

2. At all times relevant to Count Two of this Information, each bank referred to herein was a "financial institution," as that term is defined in Title 18, United States Code, Section 20.

The Conspiracy

3. From in or about June 2006 through on or about September 15, 2010, in Bergen County, in the District of New Jersey, and elsewhere, defendant

SANG-HYUN PARK,
a/k/a "Jimmy,"

knowingly and intentionally conspired and agreed with Co-Conspirator H.J.Y., Co-Conspirator D.I.K., Co-Conspirator S.S.J., Co-Conspirator O.K., Co-Conspirator Y.H.J., Co-Conspirator H.I.S., Co-Conspirator D.W.K., Co-Conspirator S.H.N., Co-Conspirator R.S.K., Co-Conspirator H.S.C., Co-Conspirator M.J.K., Co-Conspirator Y.W.J., and others to:

a. 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, affecting financial institutions, contrary to Title 18, United States Code, Section 1343; and

b. execute a scheme and artifice to defraud financial institutions, and to obtain money, funds, and 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

4. The object of the conspiracy was for defendant SANG-HYUN PARK, a/k/a "Jimmy," and his co-conspirators to enrich themselves by fraudulently obtaining in excess of \$4 million from the Corporate Victims to which they were not entitled.

Manner and Means of the Conspiracy

5. It was part of the conspiracy that after the Customers obtained their Fraudulent Identities through the Criminal Enterprise, as described in Count One of this Information, defendant SANG-HYUN PARK, a/k/a "Jimmy," as the leader of the Criminal Enterprise, paid, and caused to be paid, cash to the Build Up Teams, including Co-Conspirator R.S.K., Co-Conspirator H.S.C., Co-Conspirator M.J.K., and Co-Conspirator Y.W.J., among others, to fraudulently build the credit scores and establish credit histories related to the Fraudulent Identities.

6. It was further part of the conspiracy that the Build Up Teams, using telephones and other forms of wire communications in interstate commerce, added the Fraudulent Identities, as authorized users, to their credit card accounts and the credit card accounts of other Build Up Teams.

7. It was further part of the conspiracy that defendant SANG-HYUN PARK, a/k/a "Jimmy," Co-Conspirator H.J.Y., Co-Conspirator D.I.K., Co-Conspirator S.S.J., Co-Conspirator O.K., and others directed and assisted Customers to apply for and obtain credit cards, lines of credit, and loans, including commercial and automobile loans, and to establish the Fraudulent Bank Accounts.

8. It was further part of the conspiracy that SANG-HYUN PARK, a/k/a "Jimmy," and his co-conspirators profited by engaging in khang and check jobs, as described in Paragraphs 6 through 8 above of Count One of this Information, resulting in over \$4 million in financial losses to the Corporate Victims.

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

COUNT THREE
(Aggravated Identity Theft)

1. The allegations set forth in Paragraphs 1 through 8 and 10 through 15 of Count One and Paragraphs 2 and 4 through 8 of Count Two of this Information are hereby realleged as if fully set forth herein.

2. On or about February 25, 2008, defendant SANG-HYUN PARK, a/k/a "Jimmy," used the J.J. Identity to fraudulently obtain an Illinois identification card in that name.

3. Beginning in or around January 2009, defendant SANG-HYUN PARK, a/k/a "Jimmy," in exchange for cash, sold an individual (hereinafter the "Individual"), whom he believed to be a Customer, a 586 social security card. Thereafter, on or about February 1, 2009, members of the Criminal Enterprise, at the direction of defendant SANG-HYUN PARK, a/k/a "Jimmy," escorted the Individual to Illinois and provided him with a 586 social security card in the name of an individual with initials Y.L., a real person, a corresponding altered Chinese passport, and other false documents to permit the Individual to fraudulently obtain an Illinois identification card (hereinafter the "Y.L. Identity"). Defendant SANG-HYUN PARK, a/k/a "Jimmy," then paid cash to Co-Conspirator R.S.K. and Co-Conspirator H.S.C. to fraudulently build the credit score associated with the Y.L. Identity. After completion of the credit build up process related to the Y.L. Identity, SANG-HYUN PARK, a/k/a "Jimmy,"

directed the Individual to use the Y.L. Identity to open bank accounts and to apply for and obtain credit cards. After fraudulently obtaining credit cards using the Y.L. Identity, defendant SANG-HYUN PARK, a/k/a "Jimmy," and his co-conspirators made, and caused to be made, the following fraudulent charges-i.e., khang-on these credit cards:

Approximate Date	Type of Credit Card	Amount	Description
June 8, 2009	PNC Visa	\$4,500	Convenience check cashed at PNC Bank
June 22, 2009	PNC Visa	\$850	Charge through Cocoxu, a fictitious company controlled by defendant SANG-HYUN PARK, a/k/a "Jimmy"
June 26, 2009	Macy's Visa	\$1,790	Charge through Erins Skin Supply, a fictitious company controlled by Co-Conspirator S.S.J. and another co-conspirator
June 26, 2009	Bloomingdale's Visa	\$1,350	Charge through Cocoxu, a fictitious company controlled by defendant SANG-HYUN PARK, a/k/a "Jimmy"
July 31, 2009	Chase Visa	\$7,053.52	Charge through a liquor store in Palisades Park, New Jersey
August 20, 2009	PNC Visa	\$1,000	Charge through a room salon owned by a Customer in Palisades Park, New Jersey

Approximate Date	Type of Credit Card	Amount	Description
September 2, 2009	Macy's Visa	\$2,896.81	Charge through Li Nails Plus, a fictitious company controlled by defendant SANG-HYUN PARK, a/k/a "Jimmy"
September 2, 2009	Bloomingtondale's Visa	\$2,815.79	Charge through Erins Skin Supply, a fictitious company controlled by Co-Conspirator S.S.J. and another co-conspirator
September 3, 2009	Macy's Visa	\$100	Charge through New M and K Global, a Collusive Merchant

The Charge

4. From on or about February 25, 2008 through on or about September 15, 2010, in Bergen County, in the District of New Jersey, and elsewhere, defendant

SANG-HYUN PARK,
a/k/a "Jimmy,"

knowingly transferred, possessed, and used, without lawful authority, the means of identification of other persons, namely, J.J. and Y.L., during and in relation to violations of federal law, namely, credit card fraud (18 U.S.C. § 1029), mail fraud (18 U.S.C. § 1341), wire fraud (18 U.S.C. § 1343), and bank fraud (18 U.S.C. § 1344).

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

COUNT FOUR
(Money Laundering)

1. The allegations set forth in Paragraphs 1 through 8 and 10 through 15 of Count One, Paragraphs 2 and 4 through 8 of Count Two, and Paragraphs 2 and 3 of Count Three of this Information are hereby realleged as if fully set forth herein.

2. As used in this Count, "financial transaction" has the meaning given to it in Title 18, United States Code, Section 1956(c)(4).

3. After obtaining the proceeds from "kkang" and "check jobs," as described above, defendant SANG-HYUN PARK, a/k/a "Jimmy," deposited, and caused to be deposited, the proceeds of his illegal activities into two bank accounts, with branches in Bergen County, New Jersey, that he controlled in the names of Cocoxu and Li Nails (hereinafter respectively the "Cocoxu Account" and the "Li Nails Account"). In total, from in or around June 2009 through in or around July 2010, approximately \$880,000, representing the proceeds derived from the schemes described in Counts One and Two of this Information, was deposited into these two accounts. After the proceeds of the criminal activity was deposited into these bank accounts, defendant SANG-HYUN PARK, a/k/a "Jimmy," and others at his direction, either withdrew the money by checks (payable to cash) or conducted the following wire transactions, as set forth below:

Date of Wire Transaction	From	To	Amount	Remarks
June 16, 2009	Cocoxu Account	A bank in Seoul, South Korea	\$6,000	Payment
July 22, 2009	Cocoxu Account	A bank in Seoul, South Korea	\$1,300	Gift
July 22, 2009	Cocoxu Account	A bank in Seoul, South Korea	\$2,000	Gift
August 19, 2009	Cocoxu Account	A bank in Seoul, South Korea	\$2,500	Gift
August 24, 2009	Cocoxu Account	A bank in Seoul, South Korea	\$1,700	Gift
September 8, 2009	Cocoxu Account	A bank in Seoul, South Korea	\$4,000	Gift
November 9, 2009	Cocoxu Account	A bank in Seoul, South Korea	\$9,000	Payment
December 10, 2009	Cocoxu Account	A bank in Seoul, South Korea	\$5,500	Gift
March 3, 2010	Cocoxu Account	A bank in Seoul, South Korea	\$7,000	Purchase of Merchandise
July 1, 2010	Li Nails Account	A bank in Seoul, South Korea	\$1,000	None

The Charge

4. From on or about June 16, 2009 through on or about July 1, 2010, in Bergen County, New Jersey and elsewhere, defendant

SANG-HYUN PARK,
a/k/a "Jimmy,"

knowingly conducted and attempted to conduct financial transactions affecting interstate and foreign commerce, as described in Paragraph 3 of this Count, involving the proceeds of specified unlawful activity, namely, fraud in connection with

identification documents (18 U.S.C. § 1028), credit card fraud (18 U.S.C. § 1029), mail fraud (18 U.S.C. § 1341), wire fraud (18 U.S.C. § 1343), bank fraud (18 U.S.C. § 1344), knowing that the financial transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity, and knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and Section 2.

COUNT FIVE
(Conspiracy to Defraud the United States)

1. The allegations set forth in Paragraphs 1 through 8 and 10 through 15 of Count One, Paragraphs 2 and 4 through 8 of Count Two, and Paragraphs 2 and 3 of Count Three of this Information are hereby realleged as if fully set forth herein.

The Conspiracy

2. From in or around early 2008 through on or about September 15, 2010, in Bergen County, New Jersey and elsewhere, defendant

SANG-HYUN PARK,
a/k/a "Jimmy,"

knowingly and intentionally conspired and agreed with Co-Conspirator Y.W.J., Co-Conspirator S.H.N., and others to defraud the United States by impeding, impairing, obstructing, and defeating the lawful governmental functions of the Internal Revenue Service of the Department of the Treasury, an agency of the United States, to ascertain, compute, assess, and collect income taxes.

Object of the Conspiracy

4. The object of the conspiracy was to fraudulently obtain in excess of \$182,000 in tax refunds from the Internal Revenue Service through the filing of false and fictitious tax returns and accompanying documents.

Means and Methods of the Conspiracy

5. It was part of the conspiracy that defendant SANG-HYUN PARK, a/k/a "Jimmy," and his co-conspirators created, and caused to be created, numerous federal income tax returns using 586 social security numbers belonging to other individuals, as described in Count One of this Information.

6. It was further part of the conspiracy that defendant SANG-HYUN PARK, a/k/a "Jimmy," and his co-conspirators created, and caused to be created, false Forms W-2 in support of the bogus tax returns.

7. It was further part of the conspiracy that defendant SANG-HYUN PARK, a/k/a "Jimmy," and his co-conspirators electronically filed, and caused to be filed, numerous false and fraudulent federal income tax returns with the Internal Revenue Service, claiming refunds.

8. It was further part of the conspiracy that defendant SANG-HYUN PARK, a/k/a "Jimmy," and his co-conspirators received refunds from the Internal Revenue Service, based on the false and fraudulent federal income tax returns and Forms W-2, described in Paragraphs 5 through 8 of this Count. These refunds were deposited in the Fraudulent Bank Accounts or converted into gift cards.

Overt Acts

9. In furtherance of the conspiracy and in order to effect the object thereof, defendant SANG-HYUN PARK, a/k/a "Jimmy," and his co-conspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

Overt Act	Approximate Date Return Filed	Name, Social Security Number on Return, and Description	Approximate Amount of Tax Refund
a.	October 7, 2009	Z.F. 586-xx-xxxx Fraudulent Identity used by Co-Conspirator S.S.J.	\$6,937
b.	October 7, 2009	L.Z. 586-xx-xxxx Fraudulent Identity used by Co-Conspirator S.S.J.'s brother	\$6,937
c.	October 16 2009	S.L. 586-xx-xxxx Fraudulent Identity sold by defendant SANG-HYUN PARK, a/k/a "Jimmy," to a Customer	\$8,967

Overt Act	Approximate Date Return Filed	Name, Social Security Number on Return, and Description	Approximate Amount of Tax Refund
d.	April 8, 2010	P.F. 586-xx-xxxx Fraudulent Identity used by the ex-wife of SANG-HYUN PARK, a/k/a "Jimmy"	\$2,996
e.	April 15, 2010	J.J. 586-xx-xxxx Fraudulent Identity used by defendant SANG-HYUN PARK, a/k/a "Jimmy." The Form W-2 claimed J.J. worked at Ameth Thread, a fictitious company controlled by defendant SANG-HYUN PARK, a/k/a "Jimmy"	\$3,258
f.	August 12, 2010	R.L. 586-xx-xxxx Fraudulent Identity sold by defendant SANG-HYUN PARK, a/k/a "Jimmy," to a Customer	\$9,928

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


 PAUL J. FISHMAN
 United States Attorney

CASE NUMBER: _____

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

UNITED STATES OF AMERICA

v.

**SANG-HYUN PARK,
a/k/a "Jimmy"**

INFORMATION FOR

Title 18, United States Code, Sections 371, 1028A, 1349, 1956, and 2

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