

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No.: 11-
IN-SUK JOO : Title 18, United States Code,
Section 371

I N F O R M A T I O N

(Conspiracy to Purchase a Social Security Card and to Unlawfully
Use a Means of Identification to Commit 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 IN-SUK JOO was a resident of Clark,
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 September 2009 through on or about September 15, 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant

IN-SUK JOO

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

(a) buying a social security card for the purpose of obtaining things of value, contrary to Title 42, United States Code, Section 408(a)(7)(C); and

(b) transferring, possessing, and using, without lawful authority, in a manner affecting interstate commerce, a means of identification of another person, namely, a social security number, with intent to commit and in connection with unlawful activity that constitutes a violation of federal law, namely, credit card fraud (18 U.S.C. § 1029), contrary to Title 18, United States Code, Sections 1028(a)(7) and 1028(c)(3)(A).

Objects of the Conspiracy

6. The objects of the conspiracy were for defendant IN-SUK JOO to: (a) purchase identity documents, including a social security card, from the Criminal Enterprise; and (b) use the identity documents to fraudulently obtain credits cards for the purpose of obtaining merchandise, money, and other things of value.

Manner and Means of the Conspiracy

7. It was part of the conspiracy that defendant IN-SUK JOO purchased a "586" social security card in the name of an individual with the initials D.W., an actual person, and a corresponding counterfeit Nevada driver's license from the Criminal Enterprise.

8. It was further part of the conspiracy that a member of the Criminal Enterprise fraudulently "built-up" the credit score related to the D.W. identity.

9. It was further part of the conspiracy that members of the Criminal Enterprise directed and assisted defendant IN-SUK JOO to use the D.W. identity to open bank accounts and obtain credit cards in that name. In total, the Criminal Enterprise and defendant IN-SUK JOO caused losses in excess of \$30,000 to various credit card companies through the scheme.

Overt Acts

10. In furtherance of the conspiracy and in order to effect the objects thereof, defendant IN-SUK JOO 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 September 14, 2009, during a telephone call with Co-Conspirator S.H.P., defendant IN-SUK JOO stated that she wanted to purchase a driver's license to obtain credit cards.

b. On or about September 17, 2009, during a telephone call with Co-Conspirator S.H.P., defendant IN-SUK JOO asked if the social security card she had purchased was available.

c. On or about September 30, 2009, during a telephone call with Co-Conspirator S.H.P., defendant IN-SUK JOO agreed to pay \$9,000 for fraudulent identity documents.

d. In or about April 2010, defendant IN-SUK JOO, using a 586 social security number belonging to D.W. and a corresponding counterfeit Nevada driver's license, applied for credit cards from Chase Bank, Citibank, Bloomingdale's, and GE Money Bank/Walmart.

e. On or about May 6, 2010, Co-Conspirator S.H.P. and defendant IN-SUK JOO, using a fraudulently obtained credit card in the name of D.W., charged approximately \$3,659 to a fictitious shell company controlled by Co-Conspirator S.H.P.

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.

IN-SUK JOO

INFORMATION FOR

Title 18, United States Code, Section 371

PAUL J. FISHMAN

U.S. ATTORNEY NEWARK, NEW JERSEY

ANTHONY MOSCATO

ASSISTANT U.S. ATTORNEY

NEWARK, NEW JERSEY

973-645-2752
