

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No.: 11-
JUNG-HYUCK SEO : Title 18, United States Code,
Sections 371, 1028A, 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 an Identification Document and to Commit Credit Card Fraud)

Introduction

1. At all times relevant to this Information:
 - a. Defendant JUNG-HYUCK SEO was a resident of Palisades Park, New Jersey and the registered agent of Erin's Skin Supply, Inc. (hereinafter "Erin's Skin Supply"), a purported beauty supply business located in Palisades Park, 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 genuine but fraudulently issued driver's licenses or produce counterfeit driver's licenses (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 mid-2008 through on or about September 15, 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant

JUNG-HYUCK SEO

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

(a) unlawfully producing an identification document, 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-HYUCK SEO and his co-conspirators to unlawfully enrich themselves by: (a) unlawfully producing a Fraudulent Identity; and (b) using the Fraudulent Identity 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-HYUCK SEO purchased and obtained from Co-Conspirator S.H.P. a "586" social security card in the name of an individual with the initials X.Z., an actual person.

8. It was further part of the conspiracy that defendant JUNG-HYUCK SEO used the "586" social security number, issued to X.Z., to obtain a genuine but fraudulently issued identification card (hereinafter the "X.Z. Identity").

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

10. It was further part of the conspiracy that defendant JUNG-HYUCK SEO and members of the Criminal Enterprise used the X.Z. Identity to open bank accounts and apply for and obtain credit cards. In total, the Criminal Enterprise and defendant JUNG-HYUCK SEO caused losses in excess of \$336,000 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-HYUCK SEO 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 October 27, 2008, defendant JUNG-HYUCK SEO obtained an identification card from the Illinois Department of Vehicle Services in the name of X.Z.

b. In or around January 2009, defendant JUNG-HYUCK SEO used the X.Z. Identity to apply for credit cards issued by Chase Bank.

c. In or around April 2009, defendant JUNG-HYUCK SEO used the X.Z. Identity to apply for credit cards issued by Bloomingdale's.

d. In or around May 2010, in Bergen County, New Jersey, defendant JUNG-HYUCK SEO used the X.Z. Identity to open a business checking account at PNC bank for Erin's Skin Supply.

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.

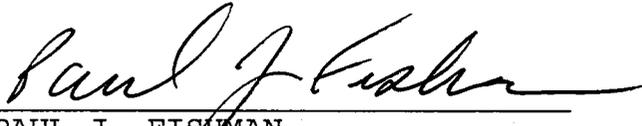
The Charge

2. From in or around mid-2008 through on or about September 15, 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant

JUNG-HYUCK SEO

knowingly transferred, possessed, and used, without lawful authority, the means of identification of another person, namely, X.Z., during and in relation to violations of federal law, namely, unlawfully producing an identification document (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

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INFORMATION FOR

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

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