

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

: INDICTMENT

-v.-

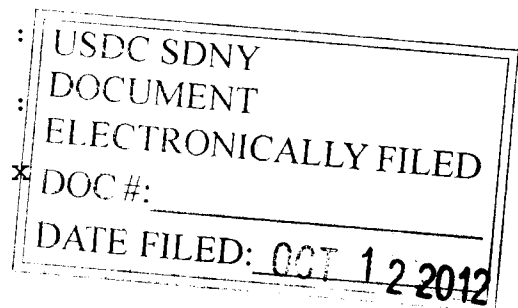
CHRISTIE HWANG,
JAE HYUNG RO,
a/k/a "Jason Ro,"
ROMERO JOHNSON, and
LOIS POWELL,"

Defendants.

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COUNT ONE

12 Cr.
12 CRIM 781



The Grand Jury charges:

1. From in or about January 2011 through in or about November 2011, in the Southern District of New York and elsewhere, CHRISTIE HWANG and JAE HYUNG RO, a/k/a "Jason Ro," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit offenses against the United States, to wit, visa fraud, in violation of Title 18, United States Code, Section 1546.

2. It was a part and an object of the conspiracy that CHRISTIE HWANG and JAE HYUNG RO, a/k/a "Jason Ro," the defendants, and others known and unknown, would and did knowingly utter, use, attempt to use, possess, obtain and receive an immigrant and nonimmigrant visa, permit, border crossing card, and other document prescribed by statute and

regulation for entry into and as evidence of authorized stay and employment in the United States, knowing it to have been procured by fraud and unlawfully obtained.

OVERT ACTS

3. In furtherance of said conspiracy and to effect its illegal object, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. Between April 2011 and November 2011, CHRISTIE HWANG, the defendant, made several phone calls to the director of an arts school in Manhattan.

b. In or about January 2011, JAE HYUNG RO, the defendant, made a phone call to the director of an arts school in Manhattan.

(Title 18, United States Code, Section 371.)

COUNT TWO

The Grand Jury further charges:

4. From in or about 2008 through in or about March 2011, in the Southern District of New York and elsewhere, CHRISTIE HWANG, ROMERO JOHNSON and LOIS POWELL, the defendants, and others known and unknown, willfully and knowingly did conspire, combine, confederate and agree together and with others to commit offenses against the United States, to wit, to violate Title 18, United States Code, Sections 666(a)(1)(B) and 666(a)(2).

5. It was a part and object of that conspiracy that ROMERO JOHNSON and LOIS POWELL, the defendants, would and did corruptly solicit and demand for the benefit of a person, and accept or agree to accept, a thing of value from a person, to wit, CHRISTIE HWANG, the defendant, intending for JOHNSON and POWELL, agents of a local government, to be influenced and rewarded in connection with a business, transaction, or series of transactions of such organization, government, and agency, to wit, the New York City Workforce Investment Board, involving a thing of value of \$5,000 and more, while the New York City Workforce Investment Board was in receipt of, in any one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance and other form of federal assistance, in violation of Title 18, United States Code, Section 666(a)(1)(B).

6. It was further a part and object of that conspiracy that CHRISTIE HWANG, the defendant, would and did corruptly give, offer, and agree to give a thing of value to persons, to wit, ROMERO JOHNSON and LOIS POWELL, the defendants, with intent to influence and reward an agent or organization of a local government, and an agency thereof, to wit, the New York City Workforce Investment Board, in connection with a business, transaction, and series of transactions of such organization, government, and agency involving a thing of value of \$5,000 and

more, while New York City Workforce Investment Board was in receipt of, in any one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance and other form of federal assistance, in violation of Title 18, United States Code, Section 666(a)(2).

Overt Acts

7. In furtherance of said conspiracy and to effect its illegal objects, the following overt acts, among others, were committed in the Southern District of New York:

a. Between 2008 and March 2011, CHRISTIE HWANG, the defendant, gave cash payments to an intermediary to give to ROMERO JOHNSON and LOIS POWELL, the defendants.

b. Between 2008 and March 2011, JOHNSON and POWELL accepted cash payments from an employee of a school located in Manhattan.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

6. As a result of committing the offenses alleged in Counts One and Two of this Indictment, CHRISTIE HWANG, JAE HYUNG RO, a/k/a "Jason Ro," ROMERO JOHNSON, and LOIS POWELL, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A) and (B), any property constituting or derived from proceeds obtained directly or indirectly as a

result of the said violations, including but not limited to a sum of United States currency representing the amount of proceeds obtained directly or indirectly as a result of the violations.

Substitute Asset Provision

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

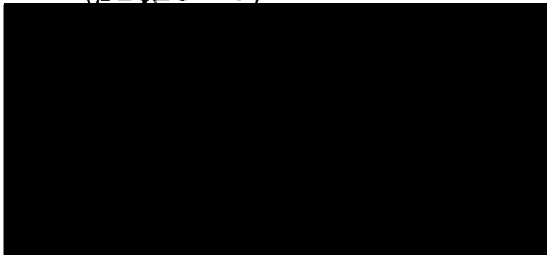
(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982, 1029 and 1343.)



Handwritten signature of Preet Bharara in black ink.

PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v -

CHRISTIE HWANG,
JAE HYUNG RO, a/k/a "JASON RO,"
ROMERO JOHNSON,
LOIS POWELL,

Defendants.

INDICTMENT

12 Cr.

(18 U.S.C. § 371)

PREET BHARARA
United States Attorney.

A TRUE BILL

son.

10/12/12
MB

Indictment filed with arrest
warrant as to defendant Lois Powell
Case assigned to Judge Forrest... 10/12/12
for all purposes.