

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : INFORMATION

-v- : 14 Cr.

CHEON PARK, :

Defendant. :

- - - - -x

COUNT ONE

The United States Attorney charges:

1. From at least in or about 2005 up to and including in or about 2013, in the Southern District of New York and elsewhere, CHEON PARK, the defendant, knowingly and willfully, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to do, did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and did deposit and cause to be deposited a matter and thing to be sent and delivered by a private and commercial interstate carrier, and did take and receive therefrom, such matter and thing, and did cause to be delivered by mail and such carrier according to the direction thereon, and at the place at which it was directed to be delivered by the person to whom it was addressed, such matter and thing, and aided and abetted such conduct, to wit, using the mail, PARK falsely

represented to, among other entities, the New York State Education Department ("NYSED"), the New York City Department of Education ("NYCDOE"), and the New York State Comptroller: (1) the amount of compensation certain individuals were purportedly paid by Bilingual Seit & Preschool, Inc. ("Bilingual SEIT"), a company that PARK owned and operated; and (2) the amount and type of work certain individuals purportedly performed for Bilingual SEIT, in order to fraudulently increase the amount of public funds that Bilingual SEIT and PARK received from, among others, the NYSED and NYCDOE for special education services and preschool programs provided to New York City children three to five years of age with physical, emotional, and/or developmental difficulties.

(Title 18, United States Code, Sections 1341 and 2.)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Information, CHEON PARK, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the said offense, including, but not limited to, a sum of money equal to at least \$1,924,318.00 in United States currency in that such sum in aggregate constitutes the amount of proceeds traceable to the commission of the offense.

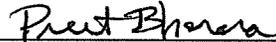
Substitute Asset Provision

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

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) 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 981 and 982, and Title 28, United States Code, Section 2461.)



PREET BHARARA
United States Attorney