

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 16-
 :
 CHUNHUA JIN : 18 U.S.C. § 1349
 :

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:

Relevant Persons and Entities

1. At all times relevant to this Information:
 - a. Defendant CHUNHUA JIN was a resident of New Jersey and elsewhere.
 - b. Co-Conspirator-1 was a resident of New Jersey and elsewhere, who participated in the conspiracy described herein with the defendant.
 - c. Co-Conspirator-2 was a resident of New Jersey and elsewhere, who participated in the conspiracy described herein with the defendant.
 - d. Bank-1 was a bank authorized to do business in the State of New Jersey and elsewhere, whose deposits were insured by the Federal Deposit Insurance Corporation. As such, Bank-1 was a “financial institution” as that term is defined in Title 18, United States Code, Section 20.

The Conspiracy

2. From on or about July 21, 2014, to in or about April 2015, in Middlesex County, Morris County, and Atlantic County, in the District of New Jersey, and elsewhere, defendant

CHUNHUA JIN

did knowingly and intentionally conspire and agree with others, including Co-Conspirator-1 and Co-Conspirator-2, to execute a scheme and artifice to defraud financial institutions, including Bank-1, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of those financial institutions, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

Object of the Conspiracy

3. The object of the conspiracy was for defendant CHUNHUA JIN and her co-conspirators to enrich themselves by opening bank accounts under false names, depositing fake checks into those bank accounts, and then withdrawing funds from those accounts before the fake checks were discovered.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendant CHUNHUA JIN and others opened accounts at banks, such as Bank-1, in the names of non-existent businesses (the "Fraud Accounts"), and made small deposits and withdrawals to make the Fraud Accounts appear legitimate.

5. It was further part of the conspiracy that after some

apparently legitimate activity, CHUNHUA JIN and others would deposit fake checks into the Fraud Accounts for large dollar amounts.

6. It was further part of the conspiracy that, after depositing the fake checks in the Fraud Accounts, defendant CHUNHUA JIN and others would withdraw as much money as possible from the Fraud Accounts before the banks realized that the checks were fraudulent and blocked further withdrawals from these accounts.

7. It was further part of the conspiracy that, using the manner and means described herein, defendant CHUNHUA JIN and others obtained at least approximately \$1,727,056.42 from the victim banks, including Bank-1.

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

FORFEITURE ALLEGATION

1. As a result of committing the offenses in violation of 18 U.S.C. § 1349 alleged in this Information, defendant CHUNHUA JIN shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), any and all property constituting or derived from proceeds obtained directly or indirectly as a result of the violation of such offenses, including but not limited to \$1,727,056.42 in United States currency.

2. 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 party;
- (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 divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described above.



PAUL J. FISHMAN
United States Attorney

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v.

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INFORMATION FOR
18 U.S.C. § 1349

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