

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No.: 16-
SUNG HO MO, : Title 18, United States Code,
a/k/a "Douglas Mo" : Sections 1349

INFORMATION
(Conspiracy to Commit Bank 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 Sung Ho Mo, a/k/a "Douglas Mo," was a resident of Totowa, New Jersey, and self-employed as a broker of residential loans and home equity lines of credit.
 - b. An individual not named as a defendant herein was a co-conspirator (hereinafter "Co-Conspirator One").
 - c. An individual not named as a defendant herein was a co-conspirator (hereinafter "Co-Conspirator Two"). Co-Conspirator Two was self-employed as a tax preparer.
 - d. Each bank referred to herein was a "financial institution," as that term is defined in Title 18, United States Code, Section 20.

The Conspiracy

2. From in or about mid-2005 through in or about January 2014, in Bergen County, in the District of New Jersey, and elsewhere, defendant

SUNG HO MO,
a/k/a "Douglas Mo,"

knowingly and intentionally conspired and agreed with Co-Conspirator One, Co-Conspirator Two, and others to execute a scheme and artifice to defraud financial institutions, and to obtain money, funds, and assets owned by and under the custody and control thereof, by means of false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

Object of the Conspiracy

4. The object of the conspiracy was for defendant Sung Ho Mo and his co-conspirators to fraudulently obtain approximately \$1.3 million in home equity lines of credit (hereinafter "HELOC Loans") from banks.

Manner and Means of the Conspiracy

5. It was part of the conspiracy that defendant Sung Ho Mo and Co-Conspirator One applied for HELOC Loans by falsely representing, among other things, their income to the banks. Defendant Sung Ho Mo and Co-Conspirator One applied for multiple HELOC Loans from various banks at the same time, a practice known as "shotgun loans," thus thwarting the banks' efforts to learn of security interests held by other banks and inducing each bank to issue their respective loan.

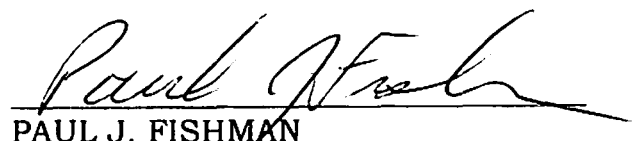
6. It was further part of the conspiracy that Co-Conspirator Two, at defendant Sung Ho Mo's direction, created false and fraudulent documents, including federal income tax returns, Forms W-2, and pay stubs.

7. It was further part of the conspiracy that defendant Sung Ho Mo submitted these false and fraudulent documents to the banks to induce them into issuing the HELOC Loans.

8. It was further part of the conspiracy that after defendant Sung Ho Mo and Co-Conspirator One received the HELOC Loans, they used the proceeds for their own use and benefit. Thereafter, defendant Sung Ho Mo failed to repay the loans, resulting in approximately \$1.3 million in financial losses to the banks.

9. It was further part of the conspiracy that defendant Sung Ho Mo and Co-Conspirator Two also fraudulently obtained HELOC Loans for others.

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


PAUL J. FISHMAN
United States Attorney

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UNITED STATES OF AMERICA

v.

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a/k/a "Douglas Mo"

INFORMATION FOR

Title 18, United States Code, Section 1349

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