

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

JIN HORNG HONG,

Defendant.

Case No. 1:20-CR-

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

The Conspiracy

1. From on or about October 1, 2019, to on or about March 9, 2020, in the Eastern District of Virginia and elsewhere, the defendant, JIN HORNG HONG, knowingly and intentionally conspired and agreed with He Li, Shouming Sun, Yuchen Zhang, and others to commit wire fraud, contrary to Title 18, United States Code, Section 1343, by knowingly devising and intending to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by concealment of material facts, and to transmit and cause to be transmitted interstate wire communications in furtherance of the conspiracy, in violation of Title 18, United States Code, Section 1349.

The Object of the Conspiracy

2. It was the object of the conspiracy for the defendant and co-conspirators Li, Sun, and Zhang to redeem the value of gift cards that were obtained by other unidentified co-conspirators through means of materially false or fraudulent pretenses, representations, and promises.

Manner and Means of the Conspiracy

3. In order to effect the object of the conspiracy, the defendant and his co-conspirators engaged in the following conduct in the Eastern District of Virginia and elsewhere:

- a. Unidentified co-conspirators contacted victims by telephone or through social media.
- b. Unidentified co-conspirators assumed fictitious identities, including falsely claiming to be from the Internal Revenue Service, the Social Security Administration, or employees of businesses or financial institutions known to the victims, and, among others ruses, falsely told victims they were entitled to grants or refunds, or in some cases had their personal identification information compromised. In other cases, unidentified co-conspirators developed on-line relationships with victims as a means to commit the fraud and effect the object of the conspiracy.
- c. Based on false representations, unidentified co-conspirators fraudulently induced more than 500 victims to purchase gift cards, including gift cards to be redeemed at Walmart and Sam's Club stores.
- d. Unidentified co-conspirators then directed the victims to send to members of the conspiracy through wire communications the gift cards' redemption codes, which are codes used to redeem the value of the gift cards without having the physical cards.
- e. Defendant HONG and co-conspirators Li, Sun, and Zhang were provided the redemption codes and used the redemption codes obtained by fraud to purchase goods and services for their personal benefit and the benefit of their co-conspirators primarily at Walmart and Sam's Club locations. These transactions occurred in the Eastern District of Virginia and elsewhere and each transaction transmitted and caused to be transmitted interstate wire

communications in furtherance of the conspiracy.

In violation of Title 18, United States Code, Section 1349.

Respectfully submitted,

G. Zachary Terwilliger
United States Attorney

By: /s/
William Fitzpatrick
Assistant United States Attorney,
Viviana Vasiu
Special Assistant United States Attorney

Date: October 23, 2020