

1 XAVIER BECERRA
Attorney General of California
2 MICHAEL L. NEWMAN
Senior Assistant Attorney General
3 SATOSHI YANAI
Supervising Deputy Attorney General
4 CAROLYN Y. LA
Deputy Attorney General
5 State Bar No. 162945
300 South Spring Street, Suite 1702
6 Los Angeles, CA 90013
Telephone: (213) 269-6415
7 Fax: (213) 897-7605
E-mail: Carolyn.La@doj.ca.gov
8 *Attorneys for the People of the State of California*

FILED
2019 FEB 11 AM 11:58
CRIMINAL DIVISION
LOS ANGELES SUPERIOR COURT

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF LOS ANGELES

13 **PEOPLE OF THE STATE OF
14 CALIFORNIA,**

15 Plaintiff,

16 v.

18 **01 JONG MIN JU aka JOON
19 (DOB: 7/17/1964),**

20 **02 IRENE PARK aka INMYUNG PARK
21 aka ANGIE JUN
(DOB: 5/12/1956),**

22 Defendants.
23

Case No. **BA444689**

**DECLARATION OF EDUARDO
MARTINEZ IN SUPPORT OF ARREST
WARRANTS**

24 I, Eduardo Martinez, am currently employed as an Investigator in the Criminal
25 Investigation Unit at the California Division of Labor Standards Enforcement (DLSE) and have
26 been so employed throughout this investigation. Pursuant to my employment, I have completed
27 680 hours of California Peace Officer Standards and Training (POST) certified instruction in the
28 Specialized Investigators Basic Academy presented by Golden West College on December 5,

1 2014. I also completed 478 hours of POST certified instruction in Module II & Module III of the
2 Basic Peace Officer Academy presented by Ventura College on June 4, 2011. I hold a Bachelor
3 of Science Degree in Criminal Justice from California State University, Long Beach.

4 I was previously employed as a Deputy Labor Commissioner at the DLSE-Bureau of Field
5 Enforcement for 13 years. During my employment as a Deputy Labor Commissioner, I held
6 investigative assignments in the Targeted Industries Partnership Program, Low Wage Industries
7 Task Force, and the Economic & Employment Enforcement Coalition. These programs were
8 designed to focus enforcement on those employers committing flagrant labor law violations or
9 operating in the underground economy.

10 Underground Economy is a term that refers to those individuals and businesses that deal in
11 cash and/or use other schemes to conceal their activities and their true tax liability from
12 government licensing, regulatory and/or taxing agencies.

13 The following information is either personally known to me or known from the statements
14 of witnesses and/or written reports provided by investigators and agents from the California
15 Department of Justice, the California Department of Motor Vehicles, the Los Angeles County
16 District Attorney's Office, and the DLSE.

17 **California's Garment Registration Laws**

18 In California, the DLSE licenses and regulates the garment manufacturing industry. All
19 garment manufacturers and contractors are required to register with the DLSE (Labor Code, §
20 2675.) Failure to register is a misdemeanor. (Labor Code, § 2676.) To obtain a garment
21 registration, garment contractors must (1) fill out an application,¹ (2) pay a fee, and (3) pass an
22 exam that covers basic labor and health and safety laws.

23 **Background**

24 Since 2012 and until March 16, 2016, the date search warrants were first executed in this
25 investigation, Jong Min Ju (Ju) aka Joon and Irene Park (Park) aka Inmyung Park and Angie Jun
26 ran a garment registration scam to deceive the DLSE into issuing registrations to garment

27 _____
28 ¹ The garment application requires the applicant to include his social security and driver's
license numbers, and to attach a copy of his driver's license card to the application.

1 contractors who (1) used false names and identifiers such as California driver's license numbers,
2 and (2) did not take the mandatory garment exams.

3 By word of mouth, garment contractors hired Ju or Park if they wanted to obtain a
4 fraudulent garment registration, meaning a registration that contained a false name. Ju known as
5 "Joon" among Korean-American garment contractors was a "broker," someone who could
6 provide garment registrations through illegal means. Park was known as "Angie Jun" in the
7 garment community; she worked as the sole employee at the Korean American Garment Industry
8 Association (KAGIA), a trade association for garment contractors from 1999 until March 16,
9 2016. Many of the contractors who hired Ju and Park could not register under their actual names
10 due to past labor violations, tax liens, or judgments; others used false names because Ju told them
11 that they could avoid liability for future labor violations if they obtained registrations through
12 him. The registration scam worked as follows:

- 13 • Garment contractors would contact Ju or Park to obtain a garment registration using a
14 false name.
- 15 • Ju provided copies of social security cards and California driver's licenses (CDLs) or
16 California identification cards (CIDs) to be used on the garment registration applications.
17 In most instances, Ju provided copies of the cards directly to the garment contractors upon
18 receipt of \$2,000 to \$2,500, usually half the fee that he charged the garment contractors.
19 In other instances, he provided copies of the identification cards to Park.
- 20 • The garment contractors would bring copies of the social security cards and CDLs or
21 CIDs to Park so that she could fill out and submit the garment applications using the false
22 information.
- 23 • Park would submit a DLSE form titled "Declaration And Authorization To Release
24 Information" for the garment applications that she filled out, permitting the DLSE to
25 release information and communicate with Park in regards to these applications.
- 26 • On the garment applications, Park would write down KAGIA's address, 1830 W. Olympic
27 Blvd., Los Angeles, CA 90006, as the address for DLSE to mail the "Authorization For
28 Examination" letters (exam notices) instead of the applicants' business or residential
addresses. Prior to November 2016, exam takers were required to bring the original exam
notices (which were embossed) to the exams and show them to the exam proctors.
- After Park received the exam notices from the DLSE, Park passed them on to Ju.
- Ju would hire exam takers to take the garment exams on behalf of the actual garment
contractors. He would meet with the exam takers the night before or the morning of the
exams and provide them with fraudulent identification cards and the original exam notices
to present to the exam proctors at the DLSE.

- 1 • After Park received the letters from the DLSE notifying the applicants that they had
2 passed the garment exam, Park would notify Ju. Ju would then collect the balance of his
3 registration fee, usually \$2,000 to \$2,500, from the garment contractors. Ju would use the
4 proceeds to pay the exam takers, name lenders (if he hired a name lender), himself, and
5 Park.

6 Identity Theft Complaint

7 This investigation began in 2015 with an identity theft complaint. On April 1, 2015, I
8 interviewed a person named Doo Nam Cha (Cha), who had complained to the DLSE that she had
9 received a labor citation for violating state labor laws while allegedly operating a garment
10 company called Claro Collection, Inc (Claro). Cha, however, said that she had no connection to a
11 company called Claro. Cha said that her name had been used on the garment application without
12 her knowledge. Cha filed a police report with the Los Angeles City Police Department alleging
13 that she was a victim of identity theft. A review of Claro's garment application revealed that
14 Cha's name, CDL number, and address had been used on the Claro garment application. But
15 instead of attaching a copy of Cha's actual CDL to the garment application, the applicant attached
16 a copy of a fraudulent CDL that had Cha's identifiers but a different photograph. Cha is female
17 while the copy of the attached fraudulent CDL had a male photo affixed to it.²

18 I interviewed the actual garment contractor for Claro, Sun Ho Kim (Kim), on the same day
19 that I spoke to Cha. Kim told me that a broker whose name he pronounced as "Joon" obtained
20 the garment registration for him using a false name in 2011. Kim said that for a fee of \$5,000,
21 Joon agreed to set up a corporation and to obtain a garment registration for Claro. Kim told me
22 that Joon provided this registration service to many garment contractors. On February 27, 2017, I
23 showed a photo of Ju to Kim, and he identified him as Joon.

24 ² On a later date, I found a copy of the fraudulent Doo Nam Cha CDL that had been
25 attached to the Claro garment application and a copy of the exam notice for Claro at a public
26 storage locker used by Ju. The Claro garment application was one of the few applications that I
27 had reviewed which had not been filed and submitted by Park. Park began submitting a high
28 volume of garment applications with Ju starting in 2012. The Claro Collection application was
submitted in 2011. Although Park did not submit the Claro application, I found copies of two
fraudulent CDLs with the names "Chin Hur" and "Mi Ra Ko" at Park's residence. The photos
affixed to these fraudulent licenses appeared to be that of the same person as the person in the
counterfeit Doo Nam Cha CDL.

1 Interview Of Garment Contractor For Joy 2040, Inc. And Ella Fashion, Inc.

2 One week after my interview with Cha and Kim, I interviewed another garment contractor
3 named Young Yoon Hong (Hong), who told me that she too had hired a person named Joon to
4 obtain garment registrations for her without the use of her actual name.³ Hong had used Joon's
5 registration service since 2009. The last two registrations were for companies called Joy 2040,
6 Inc. (Joy) and Ella Fashion, Inc. (Ella). These fraudulent registrations cost \$5,000 each, and Hong
7 paid cash for them in \$2,500 installment payments. Hong said that Joon is assisted by a person
8 named Angie Jun, who works at KAGIA, located at 1830 W. Olympic Blvd. in Los Angeles.⁴
9 Hong made a cash payment of \$2,500 to Angie Jun as partial payment for the Ella garment
10 registration in November 2014. On June 10, 2015, I had a follow-up interview with Hong and
11 she provided Angie Jun's business card with the KAGIA logo.

12 I reviewed the garment applications for Joy and Ella. Park had submitted both the Joy and
13 Ella garment applications.⁵ Park had written down KAGIA's address, as the exam notice mailing
14 address, instead of the actual garment owners' business or residential addresses. On the day of
15 the actual exams, the exam takers for both Joy and Ella wrote down the wrong names of the
16 companies that they were taking the exams for. Under "name of business," the exam taker for
17 Joy wrote "Jason's" and the exam taker for Ella wrote "Pacific Shores, Inc." Under "business
18 address/ home address," both exam takers wrote down KAGIA's address, 1830 W. Olympic
19 Blvd., L.A. 90006.⁶

20 On a later date, I found a copy of the exam notice for Joy that was mailed to KAGIA's
21 address, and a copy of a CDL with the name "Dae Jong Sang" at a public storage locker used by
22 Ju. The name Dae Jong Sang had been used on the Joy application. The copy of the Dae Jong

23 _____
24 ³ On a later date, I found Hong's phone number listed under "contacts" in Ju's cellphone.

25 ⁴ Park told me that she uses the name "Angie Jun" when I interviewed her on October 19,
26 2016.

27 ⁵ The Joy application was submitted via fax to the DLSE. The fax cover sheet for the
28 application had KAGIA's logo and Park's name as the sender. The Ella application was mailed
in an envelope with KAGIA's logo and preprinted address, and sent with a "Declaration And
Authorization To Release Information" authorizing Park to receive all communications from
DLSE pertaining to the garment application.

⁶ These paid exam takers did not know the names or addresses of the garment companies
because that information was not on the exam authorization letters.

1 Sang CDL matched the one attached to the Joy application. Next to the CDL, was a post-it with
2 the name "Miss Hong" written in Korean and the amount \$2,000. I also found a post-it with the
3 name "Young Yo Jo" with a date of birth and social security number. The name "Young Yo Jo"
4 was used on the Ella application. The social security number on the post-it matched the social
5 security number used on the Ella application.

6 Interview Of Other Garment Contractors

7 In addition to the contractor for Joy and Ella, I interviewed several other garment
8 contractors from April 2015 to October 2017. Nine of them told me that they had purchased
9 fraudulent garment registrations through Ju or Park, paying mostly in cash. These nine garment
10 contractors were the actual garment contractors for the following thirteen companies: Daebakna,
11 Inc., SMP Apparel, Inc. (same owner as Daebakna), K-9 Fashion, Inc., Mei Apparel, Inc. (same
12 owner as K-9), Star Moda, Inc., Manike, Inc., Mason Hill, Inc. (same owner as Manike),
13 Hanmaum, Inc., JT Fashion, Inc. (same owner as Hanmaum), Ena Fashion, Inc., Daeho Fashion,
14 Inc., Ye Design, Inc., and Koko Design, Inc.

15 None of these thirteen garment applications had the actual garment contractors' names on
16 the applications. Instead, these applications contained false names and were all filled out and
17 submitted by Park.⁷ The nine garment contractors associated with these companies all admitted
18 that they did not take the mandatory garment exams.

19 A review of DLSE documents show that all thirteen exam notices were sent to KAGIA's
20 address. On the exam sheets where the exam takers are required to write the name of their
21 business, the exam takers either left blank the name of the business or wrote down the wrong
22 names. Six of the false names and identifiers that were used for these thirteen garment
23 applications were found on post-its or on papers containing lists of names at a public storage
24
25
26

27 ⁷ Park submitted "Declaration and Authorization To Release Information" forms to the
28 DLSE with these garment applications.

1 locker used by Ju;⁸ photos of four of the identification cards that were attached to the garment
2 applications were found on Ju's cellphone.⁹

3 The garment contractors further told me that Ju has many customers in the garment
4 industry. Ju had pitched his garment registration service by telling garment contractors that they
5 could avoid paying for government issued fines and penalties for future labor violations if they
6 purchased garment registrations through him.

7 **Review Of Garment Applications Submitted By Defendant Park**

8 From January 1, 2015 to July 17, 2015, Park as an employee of KAGIA, had submitted 59
9 garment registration applications. Of the 59 applications, 28 had names and CDL or CID
10 numbers that did not match DMV records or had CDL or CID numbers that did not exist. I knew
11 from interviewing the garment contractors for Joy 2040, Ella Fashion, and Manike, that even if
12 the names, CDL numbers, and other personal identifiers matched DMV records, the names on the
13 applications could be false because they were not the names of the actual garment contractors.

14 A review of the garment exams for the 35 applications that I selected for this investigation
15 reveal that none of the exam takers knew the names of the companies that they were taking the
16 exams for and supposedly owned. Under "name of business," they either wrote the wrong name
17 or did not write down any name.

18 **Defendant Ju Admitted That He Obtained Garment Registrations Using False Names**

19 On March 16, 2016, investigators from the California Department of Justice and the DLSE
20 executed search warrants at KAGIA and at Park's residence. On the same day, I interviewed Ju
21 at his residence with Scott Paik, a senior investigator from the Los Angeles County District
22 Attorney's Office, and Armando Fraga, a contract investigator from the California Department of
23 Justice.

24 Ju admitted that for the past few years, he and an individual from KAGIA had obtained
25 garment registrations for contractors using false names. Although he did not want to provide the

26 _____
27 ⁸ The six names were Hexian Jia (SMP Apparel), Lianhua Cui (Daeho Fashion), Canyu
28 Ye (Ye Design), Lianji Li (Koko Design), Yahong Zhu (Mason Hill), and Yugin Lin (K-9
Fashion).

⁹ The four garment companies were Daebakna, Star Moda, Hanmaum, and Manike.

1 name of the co-conspirator from KAGIA, when I showed Ju a photograph of Park, Ju positively
2 identified her as the person from KAGIA who helped him with these fraudulent garment
3 registrations. Ju said that he personally knew some of these contractors. He became acquainted
4 with others through Park. He said that most contractors would contact Park first since she works
5 at KAGIA. After the contractors tell Park that they want to register without using their actual
6 names, Park contacts Ju to inform him that these contractors need names/identities for their
7 garment applications. While Ju found names/identities for use on the applications, he said that
8 Park handled all the paperwork for these fraudulent garment applications.

9 Ju said that the garment contractors usually paid \$4,000 to \$5,000 for these fraudulent
10 garment registrations. Ju used both Chinese and Korean names on the garment applications, but
11 usually charged \$1,000 more if a Korean name was used on the application. Using a Korean
12 name cost more because they were obtained from a "name lender," someone who lends his name
13 and identifiers such as his birthdate and CDL number for a fee. The Chinese names were not
14 purchased from name lenders. Therefore, the name and identifiers such as date of birth, CDL
15 number, and other identifiers did not always match.

16 Sometimes the name lender was also the exam taker; other times, Ju hired someone else to
17 take the garment exam. Ju usually met with these paid exam takers the day before or the morning
18 of the garment exam to provide them with the exam notices and fraudulent CDLs or CIDs to
19 present to the exam proctors. Park requested that the exam notices be mailed to KAGIA. By
20 having the exam notices mailed to KAGIA, Park was able to give the exam notices to Ju. Ju then
21 gave the notices to the paid exam takers. When I told Ju that he was observed going in and out of
22 the KAGIA office, Ju said that he went to KAGIA to pick up the exam notices from Park. Ju said
23 that he usually paid the exam takers \$500 upon their passing the exam. He said that he was
24 alerted by Park when they passed the exams. Park learned when they passed because she
25 received the congratulation letters from the DLSE.

26 In addition to paying the exam taker with the \$4,000 to \$5,000 payment that he received
27 from the real garment contractors, Ju used the proceeds to pay the name lender (if he used one)
28 and to pay himself and to pay Park.

1 these images were associated with identification cards that had been submitted with garment
2 applications by Park.

3 Photos of the CDLs found on the phones were texted to different individuals. Based on the
4 content of the texts, it appears that many of the photos were sent to paid exam takers. For
5 example, images of the fraudulent CDL that was attached to the Daebakna application, were sent
6 via text to a person Ju identified on his phone as "Mr. Yang" the day before the exam taker took
7 the garment exam for Daebakna. An image of the CDL attached to the Hanmaum application was
8 sent via text to another person the day before the exam taker took the exam for Hanmaum.

9 **Statement Of Defendant Park**

10 After the execution of the search warrants, Park contacted me through her attorney
11 Christine Ham, and said that she wanted to talk to me. On October 19, 2016, I interviewed Park
12 at her attorney Christine Ham's office along with Scott Paik, a senior investigator from the Los
13 Angeles County District Attorney's Office, and Armando Fraga, a contract investigator from the
14 California Department of Justice. Park said that she started using the name "Angie Jun" after she
15 had married.

16 Park denied any wrongdoing and said that she did not know a person named Joon. When I
17 showed Park photos of Ju and told her that we had seen him entering and exiting KAGIA's office,
18 she said that the person in the photo had been at the KAGIA office to drop off documents, but she
19 insisted that she did not know his name.

20 I told Park that the garment applications that she filled out contained false names and
21 identifiers. When I asked her if she ever signed the garment applications herself, Park said that
22 all the garment contractors came in person to KAGIA to sign the garment applications in her
23 presence. She said that only one applicant did not sign his name in her presence; the application
24 was for Daebakna.¹⁰

25 The actual garment contractor for Daebakna, Jung Soo Lee, told us that in addition to the
26 Daebakna registration, he had purchased another fraudulent garment registration from Ju for a

27 _____
28 ¹⁰ In a search warrant, I had specifically mentioned that a fraudulent CDL with the name Samuel Yoo had been used on a garment application for a company called Daebakna.

1 company called SMP Apparel, Inc. (SMP). I reviewed the SMP garment application, and learned
2 that Park had filled out and submitted the SMP application as well. Park used the false name,
3 "Hexian Jia" on the SMP application. A copy of a CDL with the name Hexian Jia was attached
4 to the SMP application. After checking with DMV, I learned that the CDL number did not exist
5 and that the attached CDL was fraudulent. A copy of this fraudulent CDL was found at Park's
6 residence. In addition, I found two California Secretary of State (SOS) documents at Park's
7 house for SMP. An SOS document file stamped August 14, 2014 had the name Hexian Jia. The
8 other SOS document for SMP Apparel file stamped October 22, 2014 had the name of the actual
9 garment contractor, Jung Soo Lee.

10 I found the name Hexian Jia on a list of names at Ju's storage locker. Next to the names
11 were dates of births and social security numbers. Many of these names and identifiers were the
12 same as those found on garment applications filed by Park. The exam notices for Daebakna and
13 SMP were both mailed to KAGIA.

14 An image of the CDL that Park submitted with the Daebakna application was found on Ju's
15 cellphone.

16 **Park's Statements Contradicted By Garment Contractors And Documents**

17 Park's statements are contradicted by the statements of the garment contractors and Ju. The
18 contractors had told me that they did not fill out or sign the applications. Further, many of the
19 names listed on the applications were not actual people. When the names and CDL numbers of
20 the garment applicants were checked on Cal-Photo, many of the names and numbers did not
21 match or exist.¹¹ Of the 35 garment applications submitted by Park that were selected for this
22 investigation, 27 applications contained CDLs or CIDs with information that do not match DMV
23 records or contained CDL or CID numbers that do not exist.

24 **Statement Of Garment Contractor For K-9 Apparel, Inc. And Mei Apparel, Inc.**

25 One of the garment contractors whom I interviewed, Meliton Mendez (Mendez), said that
26 he was the garment contractor for the companies Mei Apparel, Inc. (Mei) and K-9 Fashion, Inc.

27 ¹¹ Cal-Photo is a law enforcement database used to access California Department of Motor
28 Vehicle (DMV) records.

1 (K-9); both applications had been filled out and submitted by Park.¹² For the Mei application,
2 Park had used the false name "Meishun Jin"; for the K-9 application, Park had used the false
3 name "Yugin Lin." Mendez said that an acquaintance had told him to go see Park at KAGIA if
4 he wanted to obtain a garment registration without the use of his real name. After Mendez met
5 with Park, Park made arrangements for him to meet Ju at a 7-11 store to pick up the identification
6 cards for use on the garment application. Mendez received copies of a social security card and
7 CDL from Ju, and he then gave these copies to Park. Both exam notices for Mei and K-9 were
8 mailed to KAGIA.

9 Mendez said that he did not take the garment exams for either the Mei or K-9 registrations.
10 The DLSE records show that three attempts were made to pass the garment exam for K-9. On the
11 first two attempts, the exam taker failed. Evidence supports that on the third attempt, Ju sent a
12 different person to take the exam. The CDL presented on the third attempt while still bearing the
13 name "Yugin Lin" and same identifiers, had a different photo affixed to it, and the photo was that
14 of a different person.¹³ In addition to the different photo, the exam taker on the third attempt
15 misspelled his name, writing "Yujin" instead of "Yugin." And the handwriting on the exam sheet
16 for the third attempt is different from the handwriting on the first two attempts. Both versions of
17 the fraudulent CDLs with the name Yugin Lin were found at Joon's public storage locker.

18 On the exam sheets, the exam takers for both K-9 (on all three attempts) and Mei left blank,
19 "name of business." Also on all of the exam sheets for K-9 and Mei, under "business
20 address/home address," the exam takers wrote "1830 W. Olympic Blvd." which is KAGIA's
21 address. Because the name of the business and business address were not written on the garment
22 authorization letters, these paid exam takers could not write down the names of the business or
23 business address. They wrote down the address to where the examination letters were sent, which
24 was KAGIA's address.

25 ¹² Mendez referred to Park as Angie. When shown a photo of Park, Mendez identified her
26 as Angie. When shown a photo of Ju, Mendez identified him as Joon. Park submitted
27 a "Declaration And Authorization To Release Information" for both the K-9 and Mei
28 garment applications.

¹³ The same photo was also used on a different CDL with the name Heaping Sun. A copy
of the Heaping Sun CDL (also fraudulent) was submitted with another garment application for a
company called Refresh Apparel, Inc. This application was also submitted by Park.

1 **Statement Of Name Lender For Daekil, Inc.**

2 In addition to the garment contractors, I also interviewed a name lender whose name and
3 identifiers were used by Ju and Park on the garment application for a company called Daekil.
4 The name lender had also agreed to take the garment exam for additional money, but she failed
5 the test on February 17, 2016. Ju had to hire another person to take the exam on March 9, 2016.
6 Ju provided the second exam taker with a fraudulent version of the name lender's CDL. The
7 name lender's statements are supported by images and texts found on Ju's cellphone. On January
8 14, 2016, the name lender texted a photo of her CDL and in another text sent her social security
9 number to Ju. On March 4, 2016, Ju sent the name lender's CDL via text to an individual
10 described as SooAh on Ju's cellphone. There are 244 text exchanges between the name lender
11 and Ju. In most of the texts, Ju and the name lender discuss the latter taking the exam and lending
12 her driver's license.

13 **Statements Of Paid Exam Takers For Suri Fashion, Inc. And D&P Apparel, Inc.**

14 Criminal investigators from the California Department of Motor Vehicles (DMV) arrested
15 and interviewed two paid exam takers on March 16, 2016 who were involved in Ju and Park's
16 registration scam. Ju had hired one of the exam takers to take the garment exam for Suri Fashion,
17 Inc. (Suri) and the other exam taker to take the exam for D&P Apparel, Inc. (D&P). The exam
18 taker for Suri, Mun Young Song ("Song") presented a fraudulent CDL with the name Zeng
19 Fanrong, and said that Ju¹⁴ had asked him to take the garment exam for someone else and
20 provided him with the CDL and exam notice. A few months after Song received his citation from
21 DMV for presenting a fraudulent CDL, I found several images of the fraudulent CDL with the
22 name Zeng Fanrong that Song had presented on the day of the garment exam on Ju's cellphone.
23 In addition, I saw that there were 213 text messages exchanged between Ju and Song.

24 The exam taker for D&P Apparel, Yong Kim ("Kim"), presented a fraudulent CID with the
25 name Huiling Li, and said that she met with an unidentified person the morning of the garment
26 exam and received a copy of the fraudulent identification card to present to the exam proctor.
27 Months later after obtaining a search warrant to search evidence from Ju's cellphones, I saw that

28 ¹⁴ Song referred to Ju as "Joon" during his interview with the DMV investigator.

1 Ju and Kim had exchanged 57 text messages with each other. Cellphone evidence also showed
2 that one week before Kim took the garment exam, Ju had sent her an image of a CID bearing the
3 name Huiling Li. The image was identical to the CID that Kim had presented to the exam proctor
4 on March 16, 2016. Ju also sent Kim an image of the exam authorization letter which had the
5 address of the exam location.

6 Both the Suri and D&P garment applications were filled out by Park. Park submitted a
7 "Declaration And Authorization To Release Information" to DLSE for both applications. The
8 photo used on the identification card for D&P, is the same photo used on the identification card
9 for another garment application for a company called Narara Fashion, Inc. (Narara). The Narara
10 garment application was also filled out and submitted by Park. A color copy of the CDL and
11 social security card attached to the Narara application were found at Park's residence. A color
12 copy of the same social security card was also found at Ju's storage locker.

13 Selection Of 35 Garment Companies

14 After reviewing more than 100 suspicious garment applications that were submitted by
15 Park, I selected thirty-five companies for this investigation. The thirty-five companies are:

16 (1) Daebakna, Inc., (2) SMP Apparel, Inc., (3) CH Plus, Inc., (4) K-9 Fashion, Inc. (5) Mei
17 Apparel, Inc., (6) Refresh Apparel, Inc., (7) Star Moda, Inc., (8) H.I.B., Inc., (9) Daekil, Inc., (10)
18 YD Apparel, Inc., (11) Ella Fashion, Inc., (12) Joy 2040, Inc., (13) Manike, Inc., (14) Mason Hill,
19 Inc., (15) HJL, Inc., (16) Hanmaum, Inc., (17) JT Fashion, Inc., (18) Ena Fashion, Inc., (19)
20 Daeho Fashion, Inc., (20) Ye Design, Inc., (21) Koko Design, Inc., (22) SG Fashion, Inc., (23)
21 Byulnara, Inc., (24) Mini Clover, Inc., (25) Nov 2, Inc., (26) Jay Dot, Inc., (27) Hyoja, Inc., (28)
22 Red Hong Kong, Inc., (29) Suri Fashion, Inc., (30) D&P Apparel, Inc., (31) Narara Fashion, Inc.,
23 (32) Bora Design, Inc., (33) Doori Fashion, Inc., (34) Ju Apparel, Inc., and (35) J&R Apparel,
24 Inc. The thirty-five garment applications have the following in common:

- 25 • All of these applications were filled out and submitted by Park. Many of the names and
26 identifiers for these applications were found in some form in Ju's public storage locker or
27 on his cellphones.
- 28 • Under "name of business," the exam takers either wrote down the wrong name or left the
space blank.

- 33 of the exam notices were mailed to KAGIA's address at 1830 W. Olympic Blvd., Los Angeles, California, 90006.
- 27 of the California driver licenses attached to the garment applications were found to be fraudulent. Either the CDL or CID number did not exist or the name did not match with the card number.
- 8 of the names used on the applications belonged to name lenders. I confirmed that they were name lenders by interviewing six of the actual garment contractors connected to the applications and one of the name lenders. The other name lender I discovered by reviewing texts between Ju and the name lender. The texts were found on Ju's cellphone.
- 11 images of identification cards attached to the garment applications were found on Ju's phone.
- The same photos (but different names) were used on applications for Daebakna and CH Plus, SMP Apparel and OREN, Refresh Apparel and K-9 Fashion, and D&P Apparel and Narara Fashion

Penal Code § 182(a)(1) – Conspiracy To File False Instrument (Garment Applications)

Penal Code section 182, subdivision (a), subsection (1) provides that if two or more persons conspire to commit any crime, they are guilty of a felony.

Ju and Park conspired together to file false documents with the DLSE, a state agency, by using false names and identifiers on garment applications in violation of Penal Code section 115(a). Many of these applicants admitted that they could not use their actual names due to past financial, tax and/or labor violations that disqualified them.

Penal Code § 115(a) – Filing A False Instrument (Garment Applications)

Penal Code Section 115, subdivision (a) provides:

Every person who knowingly procures or offers any false or forged instrument to be filed, registered, or recorded in any public office within this state, which instrument, if genuine, might be filed, registered, or recorded under any law of this state or the United States, is guilty of a felony.

Park submitted garment applications using false information (names and identifiers such as CDLs) provided by Ju. These applications were filed with the DLSE, a state agency. The garment registration information is kept on the DLSE's database; part of the information is also made available to the public on the internet. By filing applications with false information, the

1 integrity of the garment registry was compromised, and violators of state labor laws were able to
2 obtain garment registrations and avoid liability.

3 **Vehicle Code § 4463(a)(1) – Using A Counterfeit License To Defraud**

4 Vehicle Code section 4463, subdivision (a) provides in part as follows:

5 A person who, with intent to prejudice, damage, or defraud, commits any of the
6 following acts is guilty of a felony: 1) alters, forges, counterfeits, or falsifies . . .[a]
7 license . . . or with fraudulent intent displays or causes or permits to be displayed or
8 have in his or her possession a blank, incomplete, canceled, suspended, revoked,
9 altered, forged, counterfeit, or false. . . license. . .

10 The exam takers hired by Ju presented fraudulent California driver licenses to the exam
11 proctors on the dates of the garment exams. Those fraudulent licenses were provided by Ju. The
12 DLSE had photocopied all of the identification cards presented by the exam takers. A review of
13 the copies of the identification cards reveal that many of the licenses presented for the garment
14 exams were fraudulent.

15 **Penal Code § 530.5(a) – Identity Theft**

16 Penal Code section 530.5, subdivision (a) provides in part as follows:

17 Every person who willfully obtains personal identifying information, as defined in
18 subdivision (b) of Section 530.55, of another person, and uses that information for any
19 unlawful purpose . . . without the consent of that person, is guilty of a public offense . . .

20 Ju used Doo Nam Cha's name, date of birth, address, and California Driver License number
21 without her permission to unlawfully obtain a garment registration on behalf of another individual
22 who did not qualify for a garment registration.

23 **Conclusion**

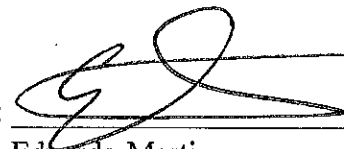
24 Our investigation has revealed that from 2012 through 2016, Ju and Park conspired to
25 submit and did submit at least 35 garment applications with false names and information. The
26 names on the applications were not the names of the actual garment contractors. Instead, the
27 names belonged to "name lenders" or were a combination of different names and identifiers
28 (CDL and social security numbers) that did not belong to actual individuals. In addition to
supplying the false names and identifiers for use on the garment applications, Ju hired exam

1 takers and provided them with fraudulent CDLs and CIDs to present to exam proctors at the
2 DLSE. Ju also used another person's name and other personal identifiers without her permission
3 to unlawfully obtain a garment registration.

4 Based on my training and experience, and based on the facts of this case, there is probable
5 cause to believe that Ju and Park violated Penal Code §§ 182(a)(1) and 115(a), and that Ju
6 violated Vehicle Code § 4463(a)(1) and Penal Code § 530.5(a). Therefore, I respectfully request
7 that arrest warrants be issued for Jong Min Ju and Inmyung Park.¹⁵

8 I declare under penalty of perjury that the foregoing is true and correct.

9
10 Date: 2/11/19

11 Declarant: 
12 Eduardo Martinez
13 Investigator

14
15
16
17
18
19
20
21
22
23
24
25
26
27 ¹⁵ In addition to this arrest warrant, I have requested that arrest warrants be issued for
28 Defendant Jong Min Ju in two other related cases. These two other cases stem from Ju's hiring of
paid exam takers who presented fraudulent identification cards on March 16, 2016. Ju is charged
with conspiring to present a fraudulent identification card in both complaints.