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CENTRAL DISTRICT
LOS ANGELES SUPERIOR COURT

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FILED

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

12
13 **PEOPLE OF THE STATE OF
CALIFORNIA,**

14 Plaintiff,

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16 v.

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18 **01 JONG MIN JU aka JOON
(DOB: 7/17/1964),**
19
20 **02 IRENE PARK aka INMYUNG PARK
aka ANGIE JUN
(DOB: 5/12/1956),**

21
22 Defendants.

Case No. **BA464689**

**FELONY COMPLAINT
FOR ARREST WARRANTS**

23
24 The Attorney General of the State of California accuses the above-named Defendants of the
25 following offenses, which are connected to each other in their commission:

26 **COUNT 1**

27 On or about and between August 1, 2012 and March 16, 2016, in the County of Los
28 Angeles, the crime of CONSPIRACY in violation of PENAL CODE SECTION 182(a)(1), a

1 Felony, was committed by JONG MIN JU and IRENE PARK, who did unlawfully conspire
2 together with another person and persons to commit the crime of: FILING FALSE OR FORGED
3 INSTRUMENT, a Felony, in violation of Penal Code section 115(a); that pursuant to and for the
4 purposes of carrying out the objectives and purposes of the aforesaid conspiracy, the following
5 overt acts were committed:

6 OVERT ACT – 1

7 On or about October 1, 2015, in the County of Los Angeles, IRENE PARK filled out a
8 Division of Labor Standards Enforcement Form DLSE 810 (Application For Garment
9 Registration) for a garment company called Daebakna, Inc. using a false name instead of the
10 applicant's true name.

11 OVERT ACT – 2

12 On or about July 30, 2014, in the County of Los Angeles, IRENE PARK filled out a
13 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
14 Registration) for a garment company called SMP Apparel, Inc. using a false name instead of the
15 applicant's true name.

16 OVERT ACT – 3

17 On or about December 2, 2014, in the County of Los Angeles, IRENE PARK filled out a
18 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
19 Registration) for a garment company called CH Plus, Inc. using a false name instead of the
20 applicant's true name.

21 OVERT ACT – 4

22 On or about April 6, 2015, in the County of Los Angeles, IRENE PARK filled out a
23 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
24 Registration) for a garment company called K-9 Fashion, Inc. using a false name instead of the
25 applicant's true name.

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1 OVERT ACT – 5

2 On or about May 27, 2014, in the County of Los Angeles, IRENE PARK filled out a
3 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
4 Registration) for a garment company called Mei Apparel, Inc. using a false name instead of the
5 applicant's true name.

6 OVERT ACT – 6

7 On or about January 26, 2015, in the County of Los Angeles, IRENE PARK filled out a
8 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
9 Registration) for a garment company called Refresh Apparel, Inc. using a false name instead of
10 the applicant's true name.

11 OVERT ACT – 7

12 On or about October 9, 2015, in the County of Los Angeles, IRENE PARK filled out a
13 Division of Labor Standards Enforcement Form DLSE 810 (Application For Garment
14 Registration) for a garment company called Star Moda, Inc. using a false name instead of the
15 applicant's true name.

16 OVERT ACT – 8

17 On or about October 10, 2015, in the County of Los Angeles, IRENE PARK filled out a
18 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
19 Registration) for a garment company called H.I.B., Inc. using a false name instead of the
20 applicant's true name.

21 OVERT ACT – 9

22 On or about January 25, 2016, in the County of Los Angeles, IRENE PARK filled out a
23 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
24 Registration) for a garment company called Daekil, Inc. using a false name instead of the
25 applicant's true name.

26 OVERT ACT – 10

27 On or about January 27, 2016, in the County of Los Angeles, IRENE PARK filled out a
28 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment

1 Registration) for a garment company called YD Apparel, Inc. using a false name instead of the
2 applicant's true name.

3 OVERT ACT – 11

4 On or about August 8, 2014, in the County of Los Angeles, IRENE PARK filled out a
5 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
6 Registration) for a garment company called Ella Fashion, Inc. using a false name instead of the
7 applicant's true name.

8 OVERT ACT – 12

9 On or about August 1, 2012, in the County of Los Angeles, IRENE PARK filled out a
10 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
11 Registration) for a garment company called Joy 2040, Inc. using a false name instead of the
12 applicant's true name.

13 OVERT ACT – 13

14 On or about September 18, 2015, in the County of Los Angeles, IRENE PARK filled out a
15 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
16 Registration) for a garment company called Manike, Inc. using a false name instead of the
17 applicant's true name.

18 OVERT ACT – 14

19 On or about December 8, 2014, in the County of Los Angeles, IRENE PARK filled out a
20 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
21 Registration) for a garment company called Mason Hill, Inc. using a false name instead of the
22 applicant's true name.

23 OVERT ACT – 15

24 On or about May 26, 2015, in the County of Los Angeles, IRENE PARK filled out a
25 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
26 Registration) for a garment company called HJL Apparel, Inc. using a false name instead of the
27 applicant's true name.

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OVERT ACT – 16

On or about October 19, 2015, in the County of Los Angeles, IRENE PARK filled out a Division of Labor Standards Enforcement Form DLSE-810 (Application for Garment Registration) for a company called Hanmaum, Inc. using a false name instead of the applicant's true name.

OVERT ACT – 17

On or about October 7, 2013, in the County of Los Angeles, IRENE PARK filled out a Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment Registration) for a garment company called JT Fashion, Inc. using a false name instead of the applicant's true name.

OVERT ACT – 18

On or about March 13, 2013, in the County of Los Angeles, IRENE PARK filled out a Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment Registration) for a garment company called ENA, Inc. using a false name instead of the applicant's true name.

OVERT ACT – 19

On or about October 31, 2014, in the County of Los Angeles, IRENE PARK filled out a Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment Registration) for a garment company called Daeho, Inc. using a false name instead of the applicant's true name.

OVERT ACT – 20

On or about January 27, 2015, in the County of Los Angeles, IRENE PARK filled out a Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment Registration) for a garment company called Ye Design, Inc. using a false name instead of the applicant's true name.

OVERT ACT – 21

On or about February 4, 2015, in the County of Los Angeles, IRENE PARK filled out a Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment

1 Registration) for a garment company called Koko Design, Inc. using a false name instead of the
2 applicant's true name.

3 OVERT ACT – 22

4 On or about November 17, 2015, in the County of Los Angeles, IRENE PARK filled out a
5 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
6 Registration) for a garment company called SG Collection, Inc. using a false name instead of the
7 applicant's true name.

8 OVERT ACT – 23

9 On or about July 17, 2015, in the County of Los Angeles, IRENE PARK filled out a
10 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
11 Registration) for a garment company called Byulnara, Inc. using a false name instead of the
12 applicant's true name.

13 OVERT ACT – 24

14 On or about July 24, 2015, in the County of Los Angeles, IRENE PARK filled out a
15 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
16 Registration) for a garment company called Mini Clover, Inc. using a false name instead of the
17 applicant's true name.

18 OVERT ACT – 25

19 On or about October 13, 2015, in the County of Los Angeles, IRENE PARK filled out a
20 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
21 Registration) for a garment company called Nov. 2, Inc. using a false name instead of the
22 applicant's true name.

23 OVERT ACT – 26

24 On or about July 10, 2015, in the County of Los Angeles, IRENE PARK filled out a
25 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
26 Registration) for a garment company called Jay Dot, Inc. using a false name instead of the
27 applicant's true name.

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1 OVERT ACT – 27

2 On or about March 27, 2015, in the County of Los Angeles, IRENE PARK filled out a
3 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
4 Registration) for a garment company called Hyoja, Inc. using a false name instead of the
5 applicant's true name.

6 OVERT ACT – 28

7 On or about December 21, 2015, in the County of Los Angeles, IRENE PARK filled out a
8 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
9 Registration) for a garment company called Red Hong Kong, Inc. using a false name instead of
10 the applicant's true name.

11 OVERT ACT – 29

12 On or about February 13, 2016, in the County of Los Angeles, IRENE PARK filled out a
13 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
14 Registration) for a garment company called Suri Fashion, Inc. using a false name instead of the
15 applicant's true name.

16 OVERT ACT – 30

17 On or about February 4, 2016, in the County of Los Angeles, IRENE PARK filled out a
18 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
19 Registration) for a garment company called D&P Fashion, Inc. using a false name instead of the
20 applicant's true name.

21 OVERT ACT – 31

22 On or about March 26, 2014, in the County of Los Angeles, IRENE PARK filled out a
23 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
24 Registration) for a garment company called Narara Fashion, Inc. using a false name instead of the
25 applicant's true name.

26 OVERT ACT – 32

27 On or about December 28, 2015, in the County of Los Angeles, IRENE PARK filled out a
28 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment

1 Registration) for a garment company called Bora Design, Inc. using a false name instead of the
2 applicant's true name.

3 OVERT ACT – 33

4 On or about January 21, 2015, in the County of Los Angeles, IRENE PARK filled out a
5 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
6 Registration) for a garment company called Doorri Family, Inc. using a false name instead of the
7 applicant's true name.

8 OVERT ACT – 34

9 On or about February 2, 2016, in the County of Los Angeles, IRENE PARK filled out a
10 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
11 Registration) for a garment company called Ju Apparel, Inc. using a false name instead of the
12 applicant's true name.

13 OVERT ACT – 35

14 On or about October 26, 2015, in the County of Los Angeles, IRENE PARK filled out a
15 Division of Labor Standards Enforcement Form DLSE 810 (Application for Garment
16 Registration) for a garment company called J&R Apparel, Inc. using a false name instead of the
17 applicant's true name.

18 **COUNT 2 (Daebakna, Inc.)**

19 On or about October 1, 2015, in the County of Los Angeles, the crime of FILING FALSE
20 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
21 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
22 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
23 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
24 registered, and recorded in a public office within this state, which instrument, if genuine, might be
25 filed, registered, and recorded under a law of this state or the United States.

26 **COUNT 3 (SMP Apparel, Inc.)**

27 On or about July 30, 2014, in the County of Los Angeles, the crime of FILING FALSE OR
28 FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was committed by

1 JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and offer a false
2 and forged instrument, to wit: a Division of Labor Standards Enforcement Form DLSE 810,
3 Application For Registration – Garment Manufacturing Industry; to be filed, registered, and
4 recorded in a public office within this state, which instrument, if genuine, might be filed,
5 registered, and recorded under a law of this state or the United States.

6 **COUNT 4 (CH Plus, Inc.)**

7 On or about December 2, 2014, in the County of Los Angeles, the crime of FILING FALSE
8 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
9 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
10 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
11 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
12 registered, and recorded in a public office within this state, which instrument, if genuine, might be
13 filed, registered, and recorded under a law of this state or the United States.

14 **COUNT 5 (K-9 Fashion, Inc.)**

15 On or about April 6, 2015, in the County of Los Angeles, the crime of FILING FALSE OR
16 FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was committed by
17 JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and offer a false
18 and forged instrument, to wit: a Division of Labor Standards Enforcement Form DLSE 810,
19 Application For Registration – Garment Manufacturing Industry; to be filed, registered, and
20 recorded in a public office within this state, which instrument, if genuine, might be filed,
21 registered, and recorded under a law of this state or the United States.

22 **COUNT 6 (Mei Apparel, Inc.)**

23 On or about May 27, 2014, in the County of Los Angeles, the crime of FILING FALSE OR
24 FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was committed by
25 JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and offer a false
26 and forged instrument, to wit: a Division of Labor Standards Enforcement Form DLSE 810,
27 Application For Registration – Garment Manufacturing Industry; to be filed, registered, and
28

1 recorded in a public office within this state, which instrument, if genuine, might be filed,
2 registered, and recorded under a law of this state or the United States.

3 **COUNT 7 (Refresh Apparel, Inc.)**

4 On or about January 26, 2015, in the County of Los Angeles, the crime of FILING FALSE
5 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
6 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
7 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
8 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
9 registered, and recorded in a public office within this state, which instrument, if genuine, might be
10 filed, registered, and recorded under a law of this state or the United States.

11 **COUNT 8 (Star Moda, Inc.)**

12 On or about October 9, 2015, in the County of Los Angeles, the crime of FILING FALSE
13 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
14 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
15 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
16 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
17 registered, and recorded in a public office within this state, which instrument, if genuine, might be
18 filed, registered, and recorded under a law of this state or the United States.

19 **COUNT 9 (H.I.B., Inc.)**

20 On or about October 10, 2015, in the County of Los Angeles, the crime of FILING FALSE
21 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
22 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
23 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
24 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
25 registered, and recorded in a public office within this state, which instrument, if genuine, might be
26 filed, registered, and recorded under a law of this state or the United States.

1 **COUNT 10 (Daekil, Inc.)**

2 On or about January 25, 2016, in the County of Los Angeles, the crime of FILING FALSE
3 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
4 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
5 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
6 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
7 registered, and recorded in a public office within this state, which instrument, if genuine, might be
8 filed, registered, and recorded under a law of this state or the United States.

9 **COUNT 11 (Daekil, Inc.)**

10 On or about March 9, 2016, in the County of Los Angeles, the crime of USING A FALSE
11 REGISTRATION CARD, LICENSE, LICENSE PLATE, PERMIT OR EVIDENCE OF
12 VEHICLE OWNERSHIP in violation of Vehicle Code section 4463(a)(1), a Felony, was
13 committed by JONG MIN JU, who with the intent to prejudice, damage and/or defraud, caused
14 and/or permitted to be displayed a counterfeit license.

15 **COUNT 12 (YD Apparel, Inc.)**

16 On or about January 27, 2016, in the County of Los Angeles, the crime of FILING FALSE
17 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
18 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
19 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
20 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
21 registered, and recorded in a public office within this state, which instrument, if genuine, might be
22 filed, registered, and recorded under a law of this state or the United States.

23 **COUNT 13 (YD Apparel, Inc.)**

24 On or about February 24, 2016, in the County of Los Angeles, the crime of USING A
25 FALSE REGISTRATION CARD, LICENSE, LICENSE PLATE, PERMIT OR EVIDENCE OF
26 VEHICLE OWNERSHIP in violation of Vehicle Code section 4463(a)(1), a Felony, was
27 committed by JONG MIN JU, who with the intent to prejudice, damage and/or defraud, caused
28 and/or permitted to be displayed, a counterfeit license.

1 **COUNT 14 (Ella Fashion, Inc.)**

2 On or about August 8, 2014, in the County of Los Angeles, the crime of FILING FALSE
3 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
4 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
5 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
6 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
7 registered, and recorded in a public office within this state, which instrument, if genuine, might be
8 filed, registered, and recorded under a law of this state or the United States.

9 **COUNT 15 (Joy 2040, Inc.)**

10 On or about August 1, 2012, in the County of Los Angeles, the crime of FILING FALSE
11 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
12 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
13 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
14 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
15 registered, and recorded in a public office within this state, which instrument, if genuine, might be
16 filed, registered, and recorded under a law of this state or the United States.

17 **COUNT 16 (Manike, Inc.)**

18 On or about September 18, 2015, in the County of Los Angeles, the crime of FILING
19 FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
20 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
21 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
22 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
23 registered, and recorded in a public office within this state, which instrument, if genuine, might be
24 filed, registered, and recorded under a law of this state or the United States.

25 **COUNT 17 (Mason Hill, Inc.)**

26 On or about December 8, 2014, in the County of Los Angeles, the crime of FILING FALSE
27 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
28 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and

1 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
2 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
3 registered, and recorded in a public office within this state, which instrument, if genuine, might be
4 filed, registered, and recorded under a law of this state or the United States.

5 **COUNT 18 (HJL Apparel, Inc.)**

6 On or about May 26, 2015, in the County of Los Angeles, the crime of FILING FALSE OR
7 FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was committed by
8 JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and offer a false
9 and forged instrument, to wit: a Division of Labor Standards Enforcement Form DLSE 810,
10 Application For Registration – Garment Manufacturing Industry; to be filed, registered, and
11 recorded in a public office within this state, which instrument, if genuine, might be filed,
12 registered, and recorded under a law of this state or the United States.

13 **COUNT 19 (Hanmaum, Inc.)**

14 On or about October 19, 2015, in the County of Los Angeles, the crime of FILING FALSE
15 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
16 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
17 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
18 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
19 registered, and recorded in a public office within this state, which instrument, if genuine, might be
20 filed, registered, and recorded under a law of this state or the United States.

21 **COUNT 20 (JT Fashion, Inc.)**

22 On or about October 7, 2013, in the County of Los Angeles, the crime of FILING FALSE
23 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
24 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
25 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
26 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
27 registered, and recorded in a public office within this state, which instrument, if genuine, might be
28 filed, registered, and recorded under a law of this state or the United States.

1 **COUNT 21 (ENA Fashion, Inc.)**

2 On or about March 13, 2013, in the County of Los Angeles, the crime of FILING FALSE
3 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
4 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
5 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
6 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
7 registered, and recorded in a public office within this state, which instrument, if genuine, might be
8 filed, registered, and recorded under a law of this state or the United States.

9 **COUNT 22 (Daeho, Inc.)**

10 On or about October 31, 2014, in the County of Los Angeles, the crime of FILING FALSE
11 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
12 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
13 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
14 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
15 registered, and recorded in a public office within this state, which instrument, if genuine, might be
16 filed, registered, and recorded under a law of this state or the United States.

17 **COUNT 23 (Ye Design, Inc.)**

18 On or about January 27, 2015, in the County of Los Angeles, the crime of FILING FALSE
19 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
20 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
21 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
22 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
23 registered, and recorded in a public office within this state, which instrument, if genuine, might be
24 filed, registered, and recorded under a law of this state or the United States.

25 **COUNT 24 (Koko Design, Inc.)**

26 On or about February 4, 2015, in the County of Los Angeles, the crime of FILING FALSE
27 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
28 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and

1 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
2 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
3 registered, and recorded in a public office within this state, which instrument, if genuine, might be
4 filed, registered, and recorded under a law of this state or the United States.

5 **COUNT 25 (SG Apparel/Collection, Inc.)**

6 On or about November 17, 2015, in the County of Los Angeles, the crime of FILING
7 FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
8 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
9 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
10 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
11 registered, and recorded in a public office within this state, which instrument, if genuine, might be
12 filed, registered, and recorded under a law of this state or the United States.

13 **COUNT 26 (Byulnara, Inc.)**

14 On or about July 17, 2015, in the County of Los Angeles, the crime of FILING FALSE OR
15 FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was committed by
16 JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and offer a false
17 and forged instrument, to wit: a Division of Labor Standards Enforcement Form DLSE 810,
18 Application For Registration – Garment Manufacturing Industry; to be filed, registered, and
19 recorded in a public office within this state, which instrument, if genuine, might be filed,
20 registered, and recorded under a law of this state or the United States.

21 **COUNT 27 (Mini Clover, Inc.)**

22 On or about July 24, 2015, in the County of Los Angeles, the crime of FILING FALSE OR
23 FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was committed by
24 JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and offer a false
25 and forged instrument, to wit: a Division of Labor Standards Enforcement Form DLSE 810,
26 Application For Registration – Garment Manufacturing Industry; to be filed, registered, and
27 recorded in a public office within this state, which instrument, if genuine, might be filed,
28 registered, and recorded under a law of this state or the United States.

1 **COUNT 28 (Nov 2, Inc.)**

2 On or about October 13, 2015, in the County of Los Angeles, the crime of FILING FALSE
3 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
4 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
5 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
6 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
7 registered, and recorded in a public office within this state, which instrument, if genuine, might be
8 filed, registered, and recorded under a law of this state or the United States.

9 **COUNT 29 (Jay Dot, Inc.)**

10 On or about July 10, 2015, in the County of Los Angeles, the crime of FILING FALSE OR
11 FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was committed by
12 JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and offer a false
13 and forged instrument, to wit: a Division of Labor Standards Enforcement Form DLSE 810,
14 Application For Registration – Garment Manufacturing Industry; to be filed, registered, and
15 recorded in a public office within this state, which instrument, if genuine, might be filed,
16 registered, and recorded under a law of this state or the United States.

17 **COUNT 30 (Hyoja, Inc.)**

18 On or about March 27, 2015, in the County of Los Angeles, the crime of FILING FALSE
19 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
20 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
21 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
22 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
23 registered, and recorded in a public office within this state, which instrument, if genuine, might be
24 filed, registered, and recorded under a law of this state or the United States.

25 **COUNT 31 (Red Hongkong, Inc.)**

26 On or about December 21, 2015, in the County of Los Angeles, the crime of FILING
27 FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
28 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and

1 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
2 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
3 registered, and recorded in a public office within this state, which instrument, if genuine, might be
4 filed, registered, and recorded under a law of this state or the United States.

5 **COUNT 32 (Suri Fashion, Inc.)**

6 On or about February 13, 2016, in the County of Los Angeles, the crime of FILING FALSE
7 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
8 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
9 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
10 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
11 registered, and recorded in a public office within this state, which instrument, if genuine, might be
12 filed, registered, and recorded under a law of this state or the United States.

13 **COUNT 33 (D&P Apparel, Inc.)**

14 On or about February 4, 2016, in the County of Los Angeles, the crime of FILING FALSE
15 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
16 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
17 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
18 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
19 registered, and recorded in a public office within this state, which instrument, if genuine, might be
20 filed, registered, and recorded under a law of this state or the United States.

21 **COUNT 34 (Narara Fashion, Inc.)**

22 On or about March 26, 2014, in the County of Los Angeles, the crime of FILING FALSE
23 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
24 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
25 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
26 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
27 registered, and recorded in a public office within this state, which instrument, if genuine, might be
28 filed, registered, and recorded under a law of this state or the United States.

1 **COUNT 35 (Bora Design, Inc.)**

2 On or about December 28, 2015, in the County of Los Angeles, the crime of FILING
3 FALSE OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
4 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
5 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
6 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
7 registered, and recorded in a public office within this state, which instrument, if genuine, might be
8 filed, registered, and recorded under a law of this state or the United States.

9 **COUNT 36 (Doori Family, Inc.)**

10 On or about January 21, 2015, in the County of Los Angeles, the crime of FILING FALSE
11 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
12 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
13 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
14 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
15 registered, and recorded in a public office within this state, which instrument, if genuine, might be
16 filed, registered, and recorded under a law of this state or the United States.

17 **COUNT 37 (Ju Apparel, Inc.)**

18 On or about February 2, 2016, in the County of Los Angeles, the crime of FILING FALSE
19 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
20 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
21 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
22 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
23 registered, and recorded in a public office within this state, which instrument, if genuine, might be
24 filed, registered, and recorded under a law of this state or the United States.

25 **COUNT 38 (Ju Apparel, Inc.)**

26 On or about February 24, 2016, in the County of Los Angeles, the crime of USING A
27 FALSE REGISTRATION CARD, LICENSE, LICENSE PLATE, PERMIT OR EVIDENCE OF
28 VEHICLE OWNERSHIP in violation of Vehicle Code section 4463(a)(1), a Felony, was

1 committed by JONG MIN JU, who with the intent to prejudice, damage and/or defraud, caused
2 and/or permitted to be displayed, a counterfeit license.

3 **COUNT 39 (J&R Apparel, Inc.)**

4 On or about October 26, 2015, in the County of Los Angeles, the crime of FILING FALSE
5 OR FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was
6 committed by JONG MIN JU and IRENE PARK, who did unlawfully and knowingly procure and
7 offer a false and forged instrument, to wit: a Division of Labor Standards Enforcement Form
8 DLSE 810, Application For Registration – Garment Manufacturing Industry; to be filed,
9 registered, and recorded in a public office within this state, which instrument, if genuine, might be
10 filed, registered, and recorded under a law of this state or the United States.

11 **COUNT 40 (Claro Collection, Inc.)**

12 On or about June 30, 2011, in the County of Los Angeles, the crime of FILING FALSE OR
13 FORGED INSTRUMENT in violation of Penal Code section 115(a), a Felony, was committed by
14 JONG MIN JU, who did unlawfully and knowingly procure and offer a false and forged
15 instrument, to wit: a Division of Labor Standards Enforcement Form DLSE 810, Application For
16 Registration – Garment Manufacturing Industry; to be filed, registered, and recorded in a public
17 office within this state, which instrument, if genuine, might be filed, registered, and recorded
18 under a law of this state or the United States.

19 **COUNT 41 (Claro Collection, Inc.)**

20 On or about June 30, 2011, in the County of Los Angeles, the crime of IDENTITY THEFT
21 in violation of Penal Code Section 530.5(a), a Felony, was committed by JONG MIN JU, who did
22 willfully and unlawfully obtain personal identifying information of Doo Nam Cha and used that
23 information for an unlawful purpose and to obtain credit, goods, services, real property, and
24 medical information without the consent of Doo Nam Cha.

25 **TOLLING OF THE STATUTE OF LIMITATIONS**

26 It is further alleged that the above violations are offenses described in Penal Code section
27 803.5 (Violations Of Section 115 or 530.5 With Respect To When Limitation Of Time
28 Commences To Run) and Penal Code section 803(c) (Statute of Limitations Tolloed), and were not

1 discovered any earlier than February 17, 2015, and that no victim of said violations and no law
2 enforcement agency chargeable with the investigation and prosecution had actual or constructive
3 knowledge of said violations prior to said date.

4 More specifically, the California Division of Labor Standards Enforcement (DLSE) first
5 learned that a false name had been used on a garment registration application for a company
6 called Claro Collection, Inc., after the agency received a letter dated February 17, 2015, from a
7 person named Doo Nam Cha (Cha) complaining that Cha had received a labor citation from the
8 DLSE for violating state labor laws while operating Claro Collection, Inc., which Cha did not
9 own. A review of DLSE records revealed that a garment application had been submitted for
10 Claro Collection, Inc., using Cha's name and identifiers, including date of birth, address, and
11 California Driver License (CDL) number, without Cha's knowledge or consent. A copy of a
12 fraudulent CDL with Cha's identifiers was attached to the application.

13 In April 2015, Eduardo Martinez (Martinez), an investigator from DLSE, learned that the
14 actual garment contractor of Claro Collection, Inc., had purchased the garment registration with
15 the false name Doo Nam Cha from a person named "Joon" for a fee of \$5,000. Joon was later
16 identified as Defendant Jong Min Ju (Ju).

17 Martinez interviewed other garment contractors and learned that they too had purchased
18 garment registrations from "Joon" and from his co-conspirator Defendant Irene Park (Park) aka
19 Angie Jun, who worked at the Korean American Garment Industry Association (KAGIA).

20 The statute of limitations for filing a false document, Penal Code section 115, and identity
21 theft, Penal Code section 530.5(a), are both four years from the date of discovery. The letter from
22 Doo Nam Cha, that triggered this investigation, was not received by the DLSE until after
23 February 17, 2015. Therefore, the statute of limitations for the false filing and identity theft
24 violations pertaining to Claro Collection, Inc. (Counts 40 and 41), would not have started until
25 February 17, 2015, and does not expire until February 17, 2019. All of the other false filing
26 counts in this complaint were discovered after that date from interviews with garment contractors
27 and from reviewing evidence obtained from search warrants executed in March and June of 2016.

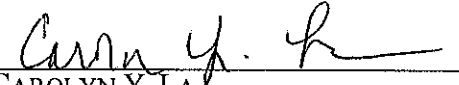
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DECLARATION

I declare under penalty of perjury that the foregoing is true and correct. Executed this 11th day of February, 2019, at Los Angeles, California.

XAVIER BECERRA
Attorney General of California

By: 
CAROLYN Y. LA
Deputy Attorney General
Attorneys for the People of the State of California

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NOTICE TO DEFENDANTS AND ATTORNEYS

Pursuant to Penal Code section 1054.5(b), the People of the State of California hereby informally request that defense counsel provide discovery to the People as required by Penal Code section 1054.3.

NOTICE TO ATTORNEYS

Any materials accompanying this complaint or provided by the People in this case may contain information about witnesses. Such information is subject to Penal Code section 1054.2, which provides, "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

1 SUPERIOR COURT OF CALIFORNIA

2 COUNTY OF LOS ANGELES

3
4 WARRANT OF ARREST

5
6 The People of the State of California to any peace officer of said State:

7 Proof by declaration under penalty of perjury having been made this day to me by
8 Investigator Eduardo Martinez of the California Division of Labor Standards Enforcement, and as
9 described in the accompanying felony complaint, I find there is probable cause to believe that the
10 following crimes have been committed by JONG MIN JU: conspiracy in violation of Penal Code
11 section 182(a)(1); filing a false instrument in violation of Penal Code section 115(a); using a false
12 license in violation of Vehicle Code section 4463(a)(1); and identity theft in violation of Penal
13 Code section 530.5(a).

14 Therefore, you are commanded to arrest JONG MIN JU, and to bring said Defendant before
15 any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the
16 California Penal Code.

17
18 Defendant is to be admitted to bail in the sum of \$ 1,405,000.00.

19 Dated: 2-11-19

20 Time Issued: 11:51 (am/pm)



Alison M. Estrada

JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles
Alison M. Estrada

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**SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES**

WARRANT OF ARREST

The People of the State of California to any peace officer of said State:

Proof by declaration under penalty of perjury having been made this day to me by Investigator Eduardo Martinez of the California Division of Labor Standards Enforcement, and as described in the accompanying felony complaint, I find there is probable cause to believe that the following crimes have been committed by IRENE PARK: conspiracy in violation of Penal Code section 182(a)(1); and filing a false instrument in violation of Penal Code section 115(a).

Therefore, you are commanded to arrest IRENE PARK, and to bring said Defendant before any magistrate in Los Angeles County pursuant to Sections 821, 825, 826, and 848 of the California Penal Code.

Defendant is to be admitted to bail in the sum of \$ 1,260,000.00.

Dated: 2.11.19

Time Issued: 11:51 (am/pm)



Alison M. Estrada
JUDGE OF THE SUPERIOR COURT
State of California, County of Los Angeles
Alison M. Estrada

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Defendant	DOB	CII	DMV	Bail Requested
Jong Min Ju	07/17/1964		A8027254	\$1,405,000.00
Irene Park	05/12/1956		C6876666	\$1,260,000.00
Investigating Agency	California Division of Labor Standards Enforcement			
Investigating Officer	Eduardo Martinez			
Phone No.	(213) 494-8180			
Prelim Estimate	3 days			

Order Holding To Answer – Felony Complaint (P.C. § 872)

It appearing to me that the offenses in the complaint have been committed and there is sufficient cause to believe the Defendant guilty thereof, I order that the Defendant be held to answer for the following:

(Strike out or add as applicable)

Defendant	Count No.	Charge	Range	Special Allegation	Allegation Effect
Jong Min Ju	1	PC 182(a)(1)	16-2-3		
Irene Park	1	PC 182(a)(1)	16-2-3		
Jong Min Ju	2	PC 115(a)	16-2-3		
Irene Park	2	PC 115(a)	16-2-3		
Jong Min Ju	3	PC 115(a)	16-2-3		
Irene Park	3	PC 115(a)	16-2-3		
Jong Min Ju	4	PC 115(a)	16-2-3		
Irene Park	4	PC 115(a)	16-2-3		
Jong Min Ju	5	PC 115(a)	16-2-3		
Irene Park	5	PC 115(a)	16-2-3		
Jong Min Ju	6	PC 115(a)	16-2-3		
Irene Park	6	PC 115(a)	16-2-3		
Jong Min Ju	7	PC 115(a)	16-2-3		
Irene Park	7	PC 115(a)	16-2-3		
Jong Min Ju	8	PC 115(a)	16-2-3		
Irene Park	8	PC 115(a)	16-2-3		
Jong Min Ju	9	PC 115(a)	16-2-3		
Irene Park	9	PC 115(a)	16-2-3		
Jong Min Ju	10	PC 115(a)	16-2-3		
Irene Park	10	PC 115(a)	16-2-3		
Jong Min Ju	11	VC 4463(a)(1)	16-2-3		
Jong Min Ju	12	PC 115(a)	16-2-3		
Irene Park	12	PC 115(a)	16-2-3		
Jong Min Ju	13	VC 4463(a)(1)	16-2-3		
Jong Min Ju	14	PC 115(a)	16-2-3		
Irene Park	14	PC 115(a)	16-2-3		
Jong Min Ju	15	PC 115(a)	16-2-3		
Irene Park	15	PC 115(a)	16-2-3		
Jong Min Ju	16	PC 115(a)	16-2-3		
Irene Park	16	PC 115(a)	16-2-3		
Jong Min Ju	17	PC 115(a)	16-2-3		

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Defendant	Count No.	Charge	Range	Special Allegation	Allegation Effect
Irene Park	17	PC 115(a)	16-2-3		
Jong Min Ju	18	PC 115(a)	16-2-3		
Irene Park	18	PC 115(a)	16-2-3		
Jong Min Ju	19	PC 115(a)	16-2-3		
Irene Park	19	PC 115(a)	16-2-3		
Jong Min Ju	20	PC 115(a)	16-2-3		
Irene Park	20	PC 115(a)	16-2-3		
Jong Min Ju	21	PC 115(a)	16-2-3		
Irene Park	21	PC 115(a)	16-2-3		
Jong Min Ju	22	PC 115(a)	16-2-3		
Irene Park	22	PC 115(a)	16-2-3		
Jong Min Ju	23	PC 115(a)	16-2-3		
Irene Park	23	PC 115(a)	16-2-3		
Jong Min Ju	24	PC 115(a)	16-2-3		
Irene Park	24	PC 115(a)	16-2-3		
Jong Min Ju	25	PC 115(a)	16-2-3		
Irene Park	25	PC 115(a)	16-2-3		
Jong Min Ju	26	PC 115(a)	16-2-3		
Irene Park	26	PC 115(a)	16-2-3		
Jong Min Ju	27	PC 115(a)	16-2-3		
Irene Park	27	PC 115(a)	16-2-3		
Jong Min Ju	28	PC 115(a)	16-2-3		
Irene Park	28	PC 115(a)	16-2-3		
Jong Min Ju	29	PC 115(a)	16-2-3		
Irene Park	29	PC 115(a)	16-2-3		
Jong Min Ju	30	PC 115(a)	16-2-3		
Irene Park	30	PC 115(a)	16-2-3		
Jong Min Ju	31	PC 115(a)	16-2-3		
Irene Park	31	PC 115(a)	16-2-3		
Jong Min Ju	32	PC 115(a)	16-2-3		
Irene Park	32	PC 115(a)	16-2-3		
Jong Min Ju	33	PC 115(a)	16-2-3		
Irene Park	33	PC 115(a)	16-2-3		
Jong Min Ju	34	PC 115(a)	16-2-3		
Irene Park	34	PC 115(a)	16-2-3		
Jong Min Ju	35	PC 115(a)	16-2-3		
Irene Park	35	PC 115(a)	16-2-3		
Jong Min Ju	36	PC 115(a)	16-2-3		

Defendant	Count No.	Charge	Range	Special Allegation	Allegation Effect
Irene Park	36	PC 115(a)	16-2-3		
Jong Min Ju	37	PC 115(a)	16-2-3		
Irene Park	37	PC 115(a)	16-2-3		
Jong Min Ju	38	VC 4463(a)(1)	16-2-3		
Jong Min Ju	39	PC 115(a)	16-2-3		
Irene Park	39	PC 115(a)	16-2-3		
Jong Min Ju	40	PC 115(a)	16-2-3		
Jong Min Ju	41	PC 530.5(a)	16-2-3		

I ORDER that the Defendants named below be held to answer for the above-described offenses and allegations and be admitted to bail in the sum of:

Jong Min Ju \$ _____

Irene Park \$ _____

And that said Defendants be committed to the custody of the Sheriff until such bail is given. The date of Felony arraignment is set for:

_____ in Department _____ at _____ a.m.
Date

Magistrate Date
Superior Court of California