

SUPERIOR COURT OF N.J.  
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**SUPERIOR COURT  
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SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - CRIMINAL

State Grand Jury

Number SGJ575-09-6

Superior Court 09-06-00120-S

Docket Number

STATE OF NEW JERSEY )

v. )

INDICTMENT

YU JANE CHEN )

also known as )

YU TANG )

also known as )

HAILIN YANG )

YI FENG REID )

also known as )

PENNY REID )

GEORGE LIU )

and )

JI GANG CHEN )

also known as )

DAVID CHEN )

The Grand Jurors of and for the State of New Jersey, upon  
their oaths, present that:

COUNT ONE

(Conspiracy - Second Degree)

YU JANE CHEN

YI FENG REID

GEORGE LIU

and

JI GANG CHEN

between on or about October 5, 2004, and on or about January 24, 2008, at the Borough of Closter, in the County of Bergen, at the Borough of Highland Park and at the Township of Edison, both in the in the County of Middlesex, at the City of New York, in the State of New York, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, with the purpose of promoting or facilitating the crimes of theft by deception, theft of identity, and financial facilitation of criminal activity (money laundering), did agree together that:

A. One or more of them would engage in conduct which would constitute the aforesaid crimes or an attempt or solicitation to commit such crimes; or

B. One or more of them would aid in the planning, attempt solicitation or commission of said crimes, that is:

1. Theft by Deception, in that they would purposely obtain the property of others by deception, in an amount of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:20-4;

2. Theft of Identity, in that they would purposely obtain certain personal identifying information pertaining to others and did use that information in order to assume the identity of and represent themselves as another person, without that person's authorization and with the purpose to fraudulently obtain a pecuniary benefit in an amount of \$75,000 or more, contrary to

the provisions of N.J.S.A. 2C:21-17a(4);

3. Money laundering, in that they would knowingly engage in transactions in property known to be derived from criminal activity, knowing that the transactions were designed in whole or in part to conceal or disguise the nature, location, source, ownership or control of the property derived from the criminal activity, in an amount of \$75,000 or more, contrary to the provisions of N.J.S.A. 2C:21-25b(2) (a);

All in violation of the provisions of N.J.S.A. 2C:5-2, and against the peace of this State, the government and dignity of the same.

COUNT TWO

(Theft by Deception - Second Degree)

YU JANE CHEN

YI FENG REID

and

GEORGE LIU

between on or about October 5, 2004, and on or about January 25, 2005, at the Borough of Closter, in the County of Bergen, at the City of New York, in the State of New York, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another by deception in an amount of \$75,000 or more; that is, the said YU JANE CHEN, YI FENG REID, and GEORGE LIU did purposely obtain \$314,000 by creating or reinforcing a false impression as to the financial condition and identity of L.L. on mortgage applications, and signed the name of L.L. on mortgage and closing documents in order to obtain a \$214,000 home equity line of credit from JPMorgan Chase Bank and a \$100,000 mortgage from GreenPoint Mortgage;

WHEREAS IN TRUTH AND IN FACT, as the said YU JANE CHEN, YI FENG REID, and GEORGE LIU well knew, the representations made regarding the financial condition and identity included on the mortgage applications, and the signatures of L.L. on the mortgages and closing documents were false, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(4), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT THREE

(Theft of Identity - Second Degree)

YU JANE CHEN

YI FENG REID

and

GEORGE LIU

between on or about October 5, 2004 and January 25, 2005, at the Borough of Closter, in the County of Bergen, at the City of New York, in the State of New York, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did obtain certain personal identifying information pertaining to another person and did use that information in order to assume the identity of and represent himself or herself as another person, without that person's authorization and with the purpose to fraudulently obtain or attempt to obtain a pecuniary benefit; that is, the said YU JANE CHEN, YI FENG REID, and GEORGE LIU did obtain certain personal identifying information pertaining to L.L., namely, her name, address, social security number, and date of birth, and did use this information in order to assume the identity of and represent themselves as L.L., without authorization, and with the purpose to obtain a \$214,000 home equity line of credit from JPMorgan Chase Bank and a \$100,000 mortgage from GreenPoint Mortgage in the name of L.L., contrary to the provisions of N.J.S.A. 2C:21-17a(4) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FOUR

(Theft by Deception - Second Degree)

YU JANE CHEN

YI FENG REID

and

JI GANG CHEN

between on or about December 28, 2004, and on or about January 31, 2006, at the Borough of Closter, in the County of Bergen, at the City of New York, in the State of New York, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another by deception in an amount of \$75,000 or more; that is, the said YU JANE CHEN, YI FENG REID, and JI GANG CHEN did purposely obtain \$348,500 by creating or reinforcing a false impression as to the financial condition and identity of M.H.S. on mortgage applications, and signed the name of M.H.S. on mortgage and closing documents in order to obtain a \$158,000 mortgage and \$80,000 mortgage from PNC Bank, a \$100,000 mortgage from National City Bank, and a \$98,500 mortgage from Option One Mortgage;

WHEREAS IN TRUTH AND IN FACT, as the said YU JANE CHEN, YI FENG REID, and JI GANG CHEN well knew, the representations made regarding the financial condition and identity included on the mortgage applications, and the signatures of M.H.S. on the mortgage and closing documents were false, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(4), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT FIVE

(Theft of Identity - Second Degree)

YU JANE CHEN

YI FENG REID

and

JI GANG CHEN

between on or about December 28, 2004, and on or about January 31, 2006, at the Borough of Closter, in the County of Bergen, at the City of New York, in the State of New York, at the city of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did obtain certain personal identifying information pertaining to another person and did use that information in order to assume the identity of and represent himself or herself as another person, without that person's authorization and with the purpose to fraudulently obtain or attempt to obtain a pecuniary benefit; that is, the said YU JANE CHEN, YI FENG REID, and JI GANG CHEN did obtain certain personal identifying information pertaining to M.H.S., namely, her name, address, social security number, and date of birth and did use this information in order to assume the identity of and represent themselves as M.H.S., without authorization, and with the purpose to obtain a \$158,000 and a \$80,000 mortgage from PNC Bank, a \$100,000 mortgage from National City Bank, and a \$98,500 mortgage from Option One Mortgage in the name of M.H.S., contrary to the provisions of N.J.S.A. 2C:21-17a(4) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SIX

(Theft by Deception - Second Degree)

YU JANE CHEN

and

YI FENG REID

between on or about September 16, 2004, and on or about May 27, 2005, at the Borough of Closter, in the County of Bergen, at the City of New York, in the State of New York, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another by deception in an amount of \$75,000 or more; that is, the said YU JANE CHEN and YI FENG REID did purposely obtain \$100,000 by creating or reinforcing false impression as to the identity of M.C. and M.C. trading as Formosa Associates on the mortgage application and note, and a false individual acknowledgment on the mortgage in order to obtain a \$100,000 mortgage from PNC Bank;

WHEREAS IN TRUTH AND IN FACT, as the said YU JANE CHEN and YI FENG REID well knew, the representations made regarding M.C. and M.C. trading as Formosa Associates were false and the individual acknowledgment on the mortgage signed by a notary public was false, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(4); and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT SEVEN

(Theft by Deception - Third Degree)

YU JANE CHEN

and

YI FENG REID

between on or about June 15, 2004, and on or about April 26, 2005, at the Borough of Closter, in the County of Bergen, at the Borough of Highland Park, in the County of Middlesex, at the City of New York, in the State of New York, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another by deception in excess of \$500; that is, the said YU JANE CHEN and YI FENG REID did purposely obtain \$35,446.45 by creating or reinforcing a false impression they had the authority to use credit cards and checks issued by MBNA America and Fleet Bank in the name of M.K.L.;

WHEREAS IN TRUTH AND IN FACT, as the said YU JANE CHEN and YI FENG REID well knew, the use of credit cards and checks issued in the name of M.K.L. were not authorized, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(4), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT EIGHT

(Theft of Identity - Third Degree)

YU JANE CHEN

and

YI FENG REID

between on or about June 15, 2004, and on or about April 26, 2005, at the Borough of Closter, in the County of Bergen, at the Borough of Highland Park, in the County of Middlesex, at the City of New York, in the State of New York, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did obtain certain personal identifying information pertaining to another person and did use that information in order to assume the identity of and represent themselves as another person, without that person's authorization and with the purpose to fraudulently obtain or attempt to obtain a pecuniary benefit; that is, the said YU JANE CHEN and YI FENG REID did obtain certain personal identifying information pertaining to M.K.L., namely, his name, address, social security number, and date of birth and did use this information in order to obtain credit cards issued by MBNA America and Fleet Bank in the name of M.K.L. and assume the identity of and represent themselves as M.K.L., without authorization, and with the purpose to obtain a \$35,446.45 benefit by using credit cards and checks issued by MBNA America and Fleet Bank in the name of M.K.L., contrary to the provisions of N.J.S.A. 2C:21-17a(4) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT NINE

(Theft by Deception - Third Degree)

YU JANE CHEN

and

YI FENG REID

between on or about November 5, 2004, and on or about June 9, 2007, at the Borough of Closter, in the County of Bergen, at the City of New York, in the State of New York, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another by deception in an amount in excess of \$500; that is, the said YU JANE CHEN and YI FENG REID did purposely obtain \$28,959.91 by creating or reinforcing a false impression that they had the authority to use credit cards and checks issued by Wells Fargo Card Services, Independence Community Bank, and PNC in the names of S.A. and W.L.;

WHEREAS IN TRUTH AND IN FACT, as the said YU JANE CHEN and YI FENG REID well knew, the use of credit cards and checks issued in the names of S.A. and W.L. were not authorized, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(4), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TEN

(Theft of Identity - Third Degree)

YU JANE CHEN

and

YI FENG REID

between on or about November 5, 2004, and on or about June 9, 2007, at the Borough of Closter, in the County of Bergen, at the City of New York, in the State of New York, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did obtain certain personal identifying information pertaining to another person and did use that information in order to assume the identity of and represent themselves as another person, without that person's authorization and with the purpose to fraudulently obtain or attempt to obtain a pecuniary benefit; that is, the said YU JANE CHEN and YI FENG REID did obtain certain personal identifying information pertaining to S.A. and W.L., namely, W.L.'s name, address, social security number, date of birth, and a S.A. invoice, and did use this information in order to obtain credit cards issued by Wells Fargo Card Services, Independence Community Bank, and PNC in the name of S.A. and W.L. and assume the identity of and represent themselves as S.A. and W.L., without authorization, and with the purpose to obtain a \$28,959.91 benefit by using credit cards issued by Wells Fargo Card Services, Independence Community Bank, and PNC in the name of S.A. and W.L., contrary to the provisions of N.J.S.A. 2C:21-17a(4) and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT ELEVEN

(Theft by Deception - Second Degree)

YU JANE CHEN

and

YI FENG REID

between on or about December 26, 2006, and on or about January 24, 2008, at the Borough of Closter, in the County of Bergen, at the Township of Edison, in the County of Middlesex, at the City of New York, in the State of New York, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another by deception in an amount of \$75,000 or more; that is, the said YU JANE CHEN and YI FENG REID did purposely obtain \$200,000 by creating or reinforcing false impression as to the financial condition and identity of F.H.W. on a line of credit and credit card applications, and signed the name of F.H.W. and Yong Ji Associates on loan documents in order to obtain a \$200,000 line of credit from Wachovia Bank, Citizens Bank and PNC;

WHEREAS IN TRUTH AND IN FACT, as the said YU JANE CHEN and YI FENG REID well knew, the representations made regarding the financial condition and identity included on the line of credit and credit card applications were false, and the signatures of F.H.W. on the line of credit and credit card documents were fraudulent, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(4), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

COUNT TWELVE

(Theft of Identity - Second Degree)

YU JANE CHEN

and

YI FENG REID

between on or about December 26, 2006, and on or about January 24, 2008, at the Borough of Closter, in the County of Bergen, at the Township of Edison, in the County of Middlesex, at the City of New York, in the State of New York, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did obtain certain personal identifying information pertaining to another person and did use that information in order to assume the identity of and represent themselves as another person, without that person's authorization and with the purpose to fraudulently obtain or attempt to obtain a pecuniary benefit; that is, the said YU JANE CHEN and YI FENG REID did obtain certain personal identifying information pertaining to F.H.W., namely, his name, address, social security number, and date of birth and did use this information in order to obtain lines of credit and a credit card issued by Wachovia Bank, Citizens Bank, and PNC in the name of F.H.W. and Yong Ji Associates, and assume the identity of and represent themselves as F.H.W., without authorization, and with the purpose to obtain a \$200,000 benefit by using checks and a credit card issued by Wachovia Bank, Citizens Bank and PNC in the name of F.H.W. and Yong Ji Associates, contrary to the provisions of N.J.S.A. 2C:21-17a(4) and N.J.S.A. 2C:2-6, and against the peace of this State, the government

and dignity of the same.

COUNT THIRTEEN

(Theft by Deception - Second Degree)

YU JANE CHEN

and

YI FENG REID

between on or about March 6, 2007, and on or about August 24, 2007, at the Borough of Closter, in the County of Bergen, at the City of Philadelphia, in the Commonwealth of Pennsylvania, elsewhere, and within the jurisdiction of this Court, did purposely obtain the property of another by deception in an amount of \$75,000 or more; that is, the said YU JANE CHEN and YI FENG REID did purposely obtain \$75,000 by creating or reinforcing false impression as to the financial condition and identity of H.W.T. on the lines of credit applications, and signed the name of H.W.T. doing business as The Wu's Associates on loan documents in order to obtain a \$25,000 and a \$50,000 line of credit and from Wachovia Bank;

WHEREAS IN TRUTH AND IN FACT, as the said YU JANE CHEN and YI FENG REID well knew, the representations made regarding the financial condition and identity included on the line of credit applications, and the signatures of H.W.T. doing business as The Wu's Associates on the lines of credit documents were false, contrary to the provisions of N.J.S.A. 2C:20-4, N.J.S.A. 2C:20-2b(4), and N.J.S.A. 2C:2-6, and against the peace of this State, the government and dignity of the same.

