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CENTRAL CRIMINAL COURT
LOS ANGELES SUPERIOR COURT

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

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

15 Plaintiff,

16 v.

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

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

23 Defendants.

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.

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

Identity Theft Complaint

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

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

² On a later date, I found a copy of the fraudulent Doo Nam Cha CDL that had been attached to the Claro garment application and a copy of the exam notice for Claro at a public storage locker used by Ju. The Claro garment application was one of the few applications that I had reviewed which had not been filed and submitted by Park. Park began submitting a high 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.

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

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

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

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

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

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

⁵ The Joy application was submitted via fax to the DLSE. The fax cover sheet for the 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.

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

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

Review Of Garment Applications Submitted By Defendant Park

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

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

Defendant Ju Admitted That He Obtained Garment Registrations Using False Names

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

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

⁸ The six names were Hexian Jia (SMP Apparel), Lianhua Cui (Daeho Fashion), Canyu 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 When we asked Ju how he kept track of all of these garment registrations, he told us that he
2 kept most of his paperwork at a public storage facility. Ju provided the location of the public
3 storage facility and agreed to meet us there. We drove in separate cars. On the way there, Ju
4 drove away from us, and never met us at the storage facility. I obtained a search warrant for the
5 public storage location. On a later date, I obtained a search warrant for two of Ju's cellphones.

6 Evidence From The Public Storage Locker

7 I obtained a search warrant for the public storage locker that Ju had authorized access to at
8 ExtraSpace Storage, 2800 W. Pico Blvd., Los Angeles, CA 90006 and found the following:

- 9 • 14 fraudulent CDLs and two fraudulent CIDs. The names and identifiers on these cards
10 were used on thirteen garment applications. Twelve of these applications were processed
11 by Park. I reviewed the garment exams for these twelve companies and found that none
12 of the exam takers wrote down the correct name of the garment company under "name of
13 business."
- 14 • 17 social security cards. All social security cards had numbers beginning with 586 and
15 had a date of birth handwritten on the back.
- 16 • 150+ copies of CDLs and/or CIDs.
- 17 • 80+ copies of social security cards.
- 18 • 50+ social security numbers written on separate sheets of paper. Next to copies of the
19 CDLs and social security cards, Ju had post-its which had the names of the actual garment
20 contractors, their telephone numbers, and payment amounts. Some of these post-its had
21 the words, "Ms. Jun's client" written in Korean. Usually there was a dollar amount next
22 to Ms. Jun's name.
- 23 • 110+ copies of garment exam authorization letters. Most were mailed to KAGIA's
24 address (1830 W. Olympic Blvd., Los Angeles, CA), dated from years 2012 and 2013,
25 and were stamped in red with the word "paid."
- 26 • 80+ post-its with garment registration numbers, names of individuals, telephone numbers,
27 and dollar amounts.
- 28 • In addition, there were congratulations letters from the DLSE, exam failure notification
letters, copies of passports, and California Secretary of State documents. These
documents were connected to garment applications submitted by Park.

25 Evidence from Defendant Ju's Cellphones

26 On June 17, 2016, I obtained a search warrant to search and seize evidence from two of Ju's
27 cellphones. On Ju's cellphones, I found numerous images of passport type photos and of CDLs
28 and CIDs that had been attached to garment applications submitted by Park. At least twenty of

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.

Statement Of Name Lender For Daekil, Inc.

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

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

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

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

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) Doorri 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**

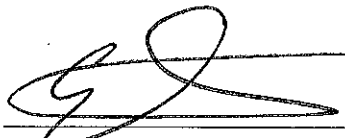
24 Our investigation has revealed that from 2012 through 2016, Ju and Park conspired to
25 submit and did submit at least 35 garment applications with false names and information. The
26 names on the applications were not the names of the actual garment contractors. Instead, the
27 names belonged to "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
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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.

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CENTRAL CRIMINAL COURT
LOS ANGELES SUPERIOR COURT

9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES
12

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

Plaintiff,

15 v.
16

17 **01 JONG MIN JU aka Joon**
(DOB: 7/17/1964),

18 **02 MUN YOUNG SONG**
19 **(DOB: 11/27/1964),**

20
21 Defendants.
22

Case No.

BA464688

DECLARATION OF EDUARDO
MARTINEZ IN SUPPORT OF ARREST
WARRANTS

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

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 (DMV), and the DLSE.

16 **California's Garment Registration Laws**

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

22 **Background**

23 Since 2012 and until March 16, 2016, the date that search warrants were first executed in
24 this investigation, Jong Min Ju ("Ju") aka Joon ran a garment registration scam to deceive the
25 DLSE into issuing registrations to garment contractors who (1) used false names and identifiers
26 such as California driver's license numbers, and (2) did not take the mandatory garment exams.
27 Ju was assisted by a person named Inmyung Park ("Park"), who worked at the Korean American
28

1 Garment Industry Association (KAGIA).¹ While Park filled out and submitted the garment
2 applications containing false information to the DLSE, Ju hired all the exam takers and provided
3 them with fraudulent California driver licenses (CDLs) or California identification cards (CIDs)
4 to present on the dates of the exams.

5 On March 16, 2016, I interviewed Ju at his residence with Scott Paik, senior investigator
6 from the Los Angeles County District Attorney's Office, and Armando Fraga, contract
7 investigator from the California Department of Justice. Ju admitted that as part of his scheme to
8 obtain garment registrations for people using false names, he hired paid exam takers to take the
9 garment exams on behalf of the real garment contractors. Ju said that he usually met with these
10 paid exam takers the day before or the morning of the garment exams to provide them with the
11 fraudulent identification cards to present to the exam proctors at the DLSE. On the day of the
12 exams, the paid exam takers would present the fraudulent CDLs or CIDs to the exam proctors,
13 pretending to be the person on the card.

14 **Song Displayed A Fraudulent CDL With The Name Zeng Fanrong**

15 On the day that I interviewed Ju, the DLSE was administering a garment registration exam
16 at 320 W. 4th Street, Los Angeles, CA 90013. When asked whether he had hired any paid exam
17 takers that particular day, Ju replied that he had hired two individuals. While we were
18 interviewing Ju, investigators from the DMV were at the DLSE exam site examining the
19 authenticity of the CDLs and CIDs presented by the exam takers. Upon examining the cards and
20 checking DMV records, the DMV investigators determined that two individuals had presented
21 fraudulent cards before taking the garment exams. The individuals were defendant Mun Young
22 Song (Song) and Yong Kim (Kim). Song presented a fraudulent CDL with the name Zeng
23 Fanrong, CDL# D1473454, and took the garment exam under the guise that he was the owner of a
24 company called Suri Fashion, Inc. DMV investigators verified that the CDL number on the card
25 that Song presented belongs to another person.

26 _____
27 ¹Ju and Park have been charged in a criminal complaint for filing thirty-five garment
28 registration applications containing false information with the DLSE in violation of Penal Code
section 115(a).

1 Kim presented a fraudulent CID with the name Huiling Li, CID# F2645244, and took the
2 garment exam under the guise that she was the owner of a company called D&P Apparel, Inc.
3 DMV investigators confirmed that the CID number on the card that Kim presented also belongs
4 to another individual.

5 Both applications for Suri Fashion, Inc. and D&P Apparel, Inc. were submitted by Park,
6 who helped Ju with his garment registration scam. Both Song and Kim were cited by DMV
7 investigators for displaying fraudulent identification cards.² Specifically, Song was cited for
8 displaying a fraudulent CDL in violation of Vehicle Code section 14610(a)(1).

9 During his interview with DMV investigator Chris Tatum, Song said that he did not know
10 Zeng Fanrong. Song said that he received the CDL with the name Zeng Fanrong and an exam
11 authorization letter from a person named "Jun" (pronounced Joon).³ The latter asked Song to
12 take the exam under the guise that he was Zeng Fanrong. Song provided his own contact number
13 as "(213) 355-4000."

14 From April 2015 to October 2017, I interviewed nine garment contractors who told me that
15 they had purchased garment registrations using false names from a person named "Joon" for a fee
16 ranging from \$4,000 to \$5,000. The contractors did not spell out Joon's name, but pronounced
17 his name as Joon. Joon promised the contractors that someone else would take the mandatory
18 garment exams on behalf of the garment contractors. I showed photos of Ju to the nine
19 contractors, and six identified Ju as Joon, the person who obtained their fraudulent garment
20 registrations.

21 //

22 //

23 _____
24 ² Kim was cited for displaying a fraudulent California Identification Card in violation of
Vehicle Code section 13400(a). She has been charged together with Ju in a separate criminal
complaint.

25 ³ Song communicated through Korean translator, Yoon Mi Jo, who is employed as a
26 deputy labor commissioner at the DLSE. According to Yoon Mi Jo, Song did not spell the name
of the person who gave him the counterfeit CDL, but said that the person's name (spelled as
27 "Jun" by investigator Tatum) was pronounced with a long "u" like "Joon." Song also did not say
whether "Jun" was the person's first or last name. DMV investigator Chris Tatum added the
28 honorific "Mr." to Jun's name in his report.

1 **Ju Kept Fraudulent IDs At A Public Storage Facility And Stored Images of Fraudulent IDs**

2 **On His Cellphones**

3 On March 16, 2016, I obtained a search warrant to search and seize evidence from a public
4 storage locker used by Ju to store documents pertaining to his garment registration scam and
5 found the following: fourteen fraudulent CDLs and two fraudulent CIDs; more than 150 copies of
6 CDLs and CIDs; and more than 110 copies of garment exam authorization letters from the DLSE.

7 A few months later, I discovered numerous images of passport type photos and CDLs and
8 CIDs on Ju's cellphones.⁴ At least twenty of these images were attached to garment applications
9 submitted by Park. In addition, I discovered that Ju had texted images of these CDLs and CIDs to
10 different individuals. Based on the content of the texts (translated from Korean to English), it
11 appears that many of the images of these identification cards were sent to paid exam takers. For
12 example, a photo of the fraudulent CID presented by Kim on March 16, 2016, was sent to her by
13 Ju on March 7, 2016, one week before the garment exam. I also found numerous images of the
14 fraudulent CDL with the name Zeng Fanrong that the DMV investigators had cited Song for
15 displaying before taking the garment exam.

16 Under Ju's contact list, I found the following number: "(213) 335-4000" with the name
17 "Song" (written in Korean) and a photograph. Although the photograph was slightly blurry, it
18 appeared to look like Song. Although the telephone number that Song provided to the DMV
19 authorities differs from the telephone number in Ju's contact list by one digit -- (213) 355-4000 as
20 compared to (213) 335-4000, I believe that the person cited by DMV is the person listed in Ju's
21 contact list. On the day Song was cited for presenting a fraudulent CDL while pretending to be
22 Zeng Fanrong, Song texted to Ju in Korean, "Is the DL that you gave me fake as well?" The
23 images of the fraudulent CDL bearing the name Zeng Fanrong on Ju's cellphone, and this text
24 from Song to Ju, further support that Ju provided Song with the fraudulent CDL bearing the name
25 Zeng Fanrong.

26
27 ⁴ On June 17, 2016, I obtained a search warrant to search and seize evidence from two of
28 Ju's cellphones.

1 In addition to that text, between November 10, 2015 to March 17, 2016, there were two
2 hundred thirteen text messages and seven images exchanged between Ju and Song. There were
3 also thirty-two phone calls between the two defendants.

4 **Song Presented a Fraudulent California Identification Card with the Name Shu Min Chen**

5 Months before Song was cited by the DMV, on December 18, 2015, a person presented a
6 CID bearing the name Shu Min Chen CID# F1883242, and took the garment exam under the
7 guise that he was the garment owner of a company called Gage Apparel, Inc. (Gage). According
8 to DMV records, no CID with that name, identification number, issuance and expiration dates
9 exists.⁵

10 I reviewed documents from the DLSE, and found a garment registration application
11 submitted under the name Shu Min Chen for a company called Gage. The application was filled
12 out and submitted by Park, Ju's assistant.

13 Months later, I reviewed evidence from Ju's cellphone and found a text dated November
14 24, 2015 sent from Ju to Song. The text contained an image of a CDL with the name "Shu Min
15 Chen."⁶ Although the words "California Driver License" cannot be seen on that image, there are
16 other images of Shu Min Chen's CDL in Ju's cellphone where the words "California Driver
17 License" are clearly visible.⁷ One of the images of Shu Min Chen's CDL had handwritten edits
18 next to it. The photo was blacked out with a marker. Although the photo was blacked out, the
19 signature on the CDL was clearly visible. The CDL expiration date was also crossed out, and a
20 handwritten date of "04-19-2020" was written next to it. The fraudulent Shu Min Chen CID
21 produced by the exam taker also had an expiration date of "04/19/2020."

22
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24
25 ⁵ According to DMV records, only one CID with the name Shu Min Chen and CID #
26 F1883242 was ever issued. That CID was issued on May 10, 2011 and expired on April 19,
27 2012. The CID with the name Shu Min Chen which was displayed on December 18, 2015, had
28 an expiration date of April 19, 2020.

⁶ The photo was sent via text to (213) 335-4000.

⁷ A copy of the CDL on the cell phone was attached to the garment application submitted
by Park.

1 I compared the handwriting on the exam sheet submitted by the exam taker who presented
2 the CID bearing the name Shu Min Chen to Song's handwriting when he took the exam under the
3 guise that he was Zeng Fanrong. The handwriting appeared to be remarkably similar.

4 I believe that Song presented the fraudulent CID bearing the name Shu Min Chen and took
5 the garment exam under the guise that he was Shu Min Chen based on the following: Ju texted a
6 photo of a CDL with the name Shu Min Chen to Song on November 24, 2015; the fraudulent CID
7 bearing the name Shu Min Chen presented by the exam taker on December 18, 2015, had the
8 expiration date of "04/19/2020," matching the date on the edited image of Shu Min Chen's CDL
9 found on Ju's cellphone; there were numerous communications between Ju and Song found on
10 Ju's cellphone; and the handwriting of the exam taker who presented the Shu Min Chen CID is
11 remarkably similar to Song's handwriting when he took the garment exam under the guise that he
12 was Zeng Fanrong.

13 **Song Presented A Fraudulent California Driver License With The Name Yingji Zheng**

14 On January 20, 2016, an exam taker presenting a fraudulent CDL with the name Yingji
15 Zheng, took the garment exam under the guise that he was the owner of a company called Red
16 Hong Kong, Inc. According to DMV records, the CDL presented with the name Yingji Zheng,
17 CDL# A6423314 does not exist. The CDL number belongs to another individual. The photo on
18 the fraudulent CDL with the name Yingji Zheng, is identical to the photo on the fraudulent CID
19 with the name Shu Min Chen. The garment application for Red Hong Kong, Inc. was submitted
20 by Park, Ju's helper.

21 I compared the handwriting on the exam sheet for Red Hong Kong, Inc. to Song's
22 handwriting when he took the garment exam under the guise that he was Zeng Fanrong. The
23 handwriting looked remarkably similar. I also noticed that the exam taker did not know the name
24 of his own company. Instead of writing Red Hong Kong, Inc., the exam taker wrote, Ying
25 Apperil, Inc. under "name of business."

26 Among the counterfeit CDLs that I had found at the public storage locker used by Ju, I
27 found a counterfeit CDL bearing the name Yingji Zheng. The identifiers on the counterfeit CDL
28

1 found at the storage locker matched the identifiers on the fraudulent CDL presented by the exam
2 taker. The photo on the cards, however, differed.

3 Based on the evidence, I believe that Song displayed the fraudulent CDL with the name
4 Yingji Zheng on January 20, 2016. The photos on the Shu Min Chen CID and Yingji Zheng CDL
5 are identical; a photo of a CDL bearing the name Shu Min Chen was sent via text to Song by Ju
6 on November 24, 2015; a counterfeit CDL with the name Yingji Zheng was found at a public
7 storage locker used by Ju. Song had to have known that the Shu Min Chen CID and Yingji
8 Zheng CDL were fraudulent because the photos on the cards were identical.

9 **Penal Code § 182(a)(1) – Conspiracy To Display A Fraudulent Identification Card**

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

12 **Vehicle Code § 13004(a)- Displaying A Fraudulent Identification Card**

13 Vehicle Code section 13004, subdivision (a), states that is unlawful for any person:

14 To display or cause or permit to be displayed or have in his possession any
15 canceled, fictitious, fraudulently altered, or fraudulently obtained identification
16 card.

17 On December 18, 2015, Ju and Song conspired to have the latter present a fraudulent CID
18 bearing the name Shu Min Chen in violation of Vehicle Code section 13004(a), so that Song
19 could unlawfully take the garment registration exam under the guise that he was Shu Min Chen.

20 **Vehicle Code § 14610(a)(1) – Displaying A Fraudulent Driver's License**

21 Vehicle Code section 14610, subdivision (a), subsection (1), states that it is
22 unlawful for any person:

23 To display or cause or permit to be displayed or have in his possession any
24 canceled, revoked, suspended, fictitious, fraudulently altered, or fraudulently
25 obtained driver's license.

26 On January 20, 2016 and March 16, 2016, Ju and Song conspired to have the latter present
27 fraudulent CDLs bearing the names Yingji Zheng and Zeng Fanrong so that Song could
28

1 unlawfully take the garment registration exam under the guise that he was Yingji Zheng and Zeng
2 Fanrong.

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
8 or have in his or her possession a blank, incomplete, canceled, suspended, revoked,
9 altered, forged, counterfeit, or false. . . license. . .


10 Song presented fraudulent CDLs with the names Yingji Zheng and Zeng Fanrong to exam
11 proctors at DLSE so that he could unlawfully take garment exams on behalf of individuals who
12 used false names on their garment applications. The fraudulent CDLs were provided by Ju. The
13 scheme by Song and Ju undermined DLSE's garment registration system which was created to
14 prevent unqualified garment contractors from obtaining garment manufacturing registrations in an
15 industry with an extremely high rate of labor violations.

16 **Conclusion**

17 Based on my training and experience, and based on the facts of this case, there is probable
18 cause to believe that Ju and Song violated Penal Code § 182(a)(1) and that Ju violated Vehicle
19 Code § 4463(a)(1). Therefore, I respectfully request that arrest warrants be issued for Jong Min Ju
20 and Mun Young Song.⁸

21
22 I declare under penalty of perjury that the foregoing is true and correct.

23
24 Date: 2/11/19

25 Declarant: 

Eduardo Martinez
Investigator

26 ⁸ In addition to this arrest warrant, I have requested that arrest warrants be issued for
27 Defendant Jong Min Ju in two other related cases. These two other cases stem from Ju's filing of
28 thirty five false garment registrations for a period of more than four years, and for conspiring with
another paid exam taker to present a fraudulent CID to deceive the DLSE.

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9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES
12

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

15 Plaintiff,

16 v.

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

19 **02 YONG KIM aka Yong Suk Kim aka**
20 **Gina Kim (DOB: 5/11/1965),**

21 Defendants.
22

Case No. **BA444487**

DECLARATION OF EDUARDO
MARTINEZ IN SUPPORT OF ARREST
WARRANTS

23
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,

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1 2014. I also completed 478 hours of POST certified instruction in Module II & Module III of the
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3 of Science Degree in Criminal Justice from California State University, Long Beach.

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

23 **Background**

24 Since 2012 and until March 16, 2016, the date that search warrants were first executed in
25 this investigation, Jong Min Ju ("Ju") aka Joon ran a garment registration scam to deceive the
26 DLSE into issuing registrations to garment contractors who (1) used false names and identifiers
27 such as California driver's license numbers, and (2) did not take the mandatory garment exams.
28 Ju was assisted by a person named Inmyung Park ("Park"), who worked at the Korean American

1 Garment Industry Association (KAGIA). While Park filled out and submitted the garment
2 applications containing false information to the DLSE, Ju hired all the exam takers and provided
3 them with fraudulent California driver licenses (CDLs) or California identification cards (CIDs)
4 to present on the dates of the exams.

5 On March 16, 2016, I interviewed Ju at his residence with Scott Paik, senior investigator
6 from the Los Angeles County District Attorney's Office, and Armando Fraga, contract
7 investigator from the California Department of Justice. Ju admitted that as part of his scheme to
8 obtain garment registrations for people using false names, he hired paid exam takers to take the
9 garment exams on behalf of the real garment contractors. Ju said that he usually met with these
10 paid exam takers the day before or the morning of the garment exams to provide them with the
11 fraudulent identification cards to present to the exam proctors at the DLSE. On the day of the
12 exams, the paid exam takers would present the fraudulent CDLs or CIDs to the exam proctors,
13 pretending to be the person on the card.

14 **Kim Displayed A Fraudulent California Identification Card With The Name Huiling Li**

15 On the day that I interviewed Ju, the DLSE was administering a garment registration exam
16 at 320 W. 4th Street, Los Angeles, CA 90013. When asked whether he had hired any paid exam
17 takers that particular day, Ju replied that he had hired two individuals.

18 While we were interviewing Ju, investigators from the DMV were at the DLSE exam site
19 examining the authenticity of the CDLs and CIDs presented by the exam takers.¹ Upon
20 examining the cards and checking DMV records, the DMV investigators determined that two
21 individuals had presented fraudulent cards before taking the garment exams. The two individuals
22 were defendant Yong Kim (Kim) and Mun Young Song (Song).

23 Kim presented a fraudulent CID with the name Huiling Li, CID# F2645244, and took the
24 garment exam under the guise that she was the owner of a company called D&P Apparel, Inc.
25 While Kim was taking the garment exam, DMV investigators determined that the CID bearing the
26

27 ¹ All exam takers are required to present an identification card on the day of the garment
28 exam.

1 name Huiling Li, CID# F2645244, was fraudulent. The CID number on the card belongs to
2 another individual.

3 Song presented a fraudulent CDL with the name Zeng Fanrong, CDL#D1473454, and took
4 the garment exam under the guise that he was the owner of a company called Suri Fashion, Inc.
5 The CDL number on the card that Song presented also belongs to another person.

6 Both applications for D&P Apparel, Inc. and Suri Fashion, Inc., were submitted by Park,
7 who helped Ju with his garment registration scam. Both Kim and Song were cited by DMV
8 investigators for displaying fraudulent identification cards.² Specifically, Kim was cited for
9 displaying a fraudulent CID in violation of Vehicle Code section 13004(a).

10 **Ju and Kim Conspired Together To Deceive The DLSE**

11 After verifying that Kim presented a fraudulent identification card, DMV Investigator
12 Christian Buado, along with two other investigators, questioned Kim about the fraudulent
13 identification card. Kim said that she was offered \$700 to take the garment exam. She said that
14 she received the identification card from an unidentified person at a McDonald's parking lot
15 earlier that morning. Kim said that she was instructed to call the unidentified person after she
16 completed the exam. Kim said that she did not know the name of this person. When asked about
17 her connection to the garment industry, Kim said that she is not involved in the garment industry
18 and did not know for whom she was taking the exam. Kim provided "(323) 483-0807" as the
19 telephone number she was instructed to contact upon completion of the exam. Kim provided her
20 own contact number as "(214) 886-5081."

21 On June 17, 2016, I obtained a search warrant for two cellular phones that belonged to Ju.
22 One of Ju's cellular phones, a black Samsung cellular phone, had the following phone number,
23 (323) 483-0807. This was same number Kim was instructed to call upon completion of the
24 garment exam.

25
26 ²Although both Kim and Song were hired by Ju to take the garment exams, there is no
27 evidence that Kim and Song knew each other. Song has been charged with Ju in a separate
28 criminal complaint for conspiring to display a fraudulent CID and CDL on more than one
occasion in violation of Penal Code section 182.

1 I reviewed Ju's black Samsung cellular phone and found Kim's number (214) 886-5081 on
2 Ju's contact list where she is identified as "Gina Kim." I looked for text messages and images
3 sent to and from Ju and Kim.

4 Between December 28, 2015 and March 16, 2016, there were fifty-seven text messages
5 exchanged between Kim and Ju, and seven images sent to and from Kim and Ju. In addition,
6 there were thirty-six calls between Kim and Ju.

7 Based on the text messages and images sent between Kim and Ju, I believe that the two
8 conspired to have Kim present a fraudulent identification card and deceive the DLSE into
9 believing that Kim was qualified and authorized to take the garment exam as a bona fide garment
10 contractor. Below is a summary of some key cellular phone communications between the two.³

- 11 • On March 4, 2016, Kim sent Ju four images of herself.
- 12 • On March 7, 2016, Ju sent Kim, an image of a California Identification Card bearing the
- 13 name Huiling Li, CID# F2645244. The image is a photo of the fraudulent identification
- 14 card that Kim presented on the day of the exam, March 16, 2016.
- 15 • On March 8, 2016, Kim sent Ju a text message asking for the address of the exam
- 16 location.
- 17 • In response later that day, Ju sent an image to Kim with the garment exam location: 320
- 18 West 4th St., Ground Floor, Junipero Serra Building, Carmel Room, Los Angeles, CA
- 19 90013.
- 20 • On March 15, 2015, Ju sent Kim a text message telling her to meet him at McDonald's at
- 21 8:20 a.m., the next morning.
- 22 • On March 16, 2016 at 8:07 a.m., Kim sent Ju a text message informing him that she had
- 23 arrived at McDonald's.
- 24 • Later that day at 11:30 a.m., after DMV investigators interviewed Kim, Kim sent Ju a text
- 25 message informing him that police stopped her after she took the garment exam. She
- 26 informs him that investigators showed a photo of Ju and that she denied knowing him.
- 27 She tells him that she told the police that she only saw him in the parking lot that morning.
- 28 • About five minutes later at 11:35 a.m., Kim sends Ju a text message telling him that she
- told investigators that she did not know his name. She informs Ju that she gave

³ This is a paraphrased translation of the Korean texts that were sent between Kim and Ju.

1 investigators his telephone number, and warns him not to answer the phone from an
2 unknown number.

- 3 • Two minutes later at 11:37 a.m., Kim sends Ju an image of her DMV citation.

4 **Penal Code § 182(a)(1) – Conspiracy To Display A Fraudulent Identification Card**

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

7 **Vehicle Code § 13004(a) - Displaying a Fraudulent Identification Card**

8 Vehicle Code section 13004, subdivision (a) states that is unlawful for any person:

9 To display or cause or permit to be displayed or have in his possession any
10 canceled, fictitious, fraudulently altered, or fraudulently obtained identification
11 card.

12 On March 16, 2016, Ju and Kim conspired to have the latter present a fraudulent CID
13 bearing the name Huiling Li to an exam proctor at the DLSE so that the latter could unlawfully
14 take the garment registration exam under the guise that Kim was a garment contractor named
15 Huiling Li. Numerous text messages between Ju and Kim corroborate that the two planned to
16 have Kim present a fraudulent CID on the day of the garment registration exam.

17 **Conclusion**

18 Based on my training and experience, and based on the facts of this case, there is probable
19 cause to believe that Ju and Kim violated Penal Code § 182(a) (1). Therefore, I respectfully
20 request that arrest warrants be issued for Jong Min Ju and Yong Kim.⁴

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

22
23 Date: 2/11/19

24 Declarant: _____

25 
Eduardo Martinez
Investigator

26 ⁴ In addition to this arrest warrant, I have requested that arrest warrants be issued for
27 Defendant Jong Min Ju in two other related cases. These two other cases stem from Ju's filing of
28 thirty five false garment registrations for a period of more than four years, and for conspiring with
another paid exam taker to present a fraudulent CDL to deceive the DLSE.