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U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
EAST. DIV. COLUMBUS

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

HYUN DONG JO,

Defendant.

*Judge Burgess*  
CRIMINAL NO. *2:21-cr-5*

INFORMATION

18 U.S.C. § 1343

The United States of America, acting through its attorneys, charges that during the period covered by this Information:

1. The Defense Logistics Agency contracts to obtain hazardous waste removal, disposal, and related services for United States Army, Navy, Marine, and Air Force installations located in the Republic of Korea (collectively "U.S. Forces Korea"). The Defense Logistics Agency entered into contract SP4530-15D-0001, effective December 26, 2014, to obtain such hazardous waste services for U.S. Forces Korea.

2. The Defense Finance and Accounting Service ("DFAS") is the financial and accounting organization for the United States Department of Defense located in Columbus, Ohio. DFAS issued all payments under contract SP4530-15D-0001.

3. **HYUN DONG JO** ("defendant") is a citizen of the Republic of Korea ("Korea"). Defendant **HYUN DONG JO** executed contract SP4530-15D-0001 with the Defense Logistics Agency, and was designated the Contract Manager.

4. Contract SP4530-15D-0001 required, in section 3.2, that: "Sampling and analysis services ordered by the government must conform to United States Environmental Protection

Agency (USEPA) or equivalent Korean standards. All analyses must be performed by a laboratory that can document its ability to meet [U.S. Environmental Protection Agency] or equivalent Korean standards.” The Department of Defense ordered numerous laboratory analytical reports under this contract provision during the life of contract SP4530-15D-0001.

5. Beginning on an exact date unknown, but at least by in or around February 2015, and continuing through at least June 2018 (the “relevant period”), defendant **HYUN DONG JO**, acting with intent to defraud, knowingly and intentionally devised, executed and participated in a scheme to defraud the U.S. Department of Defense of money, by means of materially false and fraudulent representations.

6. In furtherance of that scheme, and in response to the Department of Defense’s requests for laboratory analytical testing, defendant **HYUN DONG JO** submitted hundreds of forged laboratory analytical reports to the Department of Defense. These forged laboratory analytical reports did not accurately reflect reports that had been issued by a laboratory. Indeed, in many cases, the forged laboratory analytical reports submitted by defendant **HYUN DONG JO** falsely represented that laboratory testing had been performed on samples taken from U.S. Forces Korea installations when no such testing occurred. These false representations were material to the Department of Defense.

7. In executing his scheme to defraud, defendant **HYUN DONG JO** used the wires, and caused use of the wires. Defendant **HYUN DONG JO** submitted hundreds of the forged laboratory analytical reports to the Department of Defense by wire transmission—specifically, by email. Defendant **HYUN DONG JO** also submitted invoices seeking payment for the forged laboratory analytical reports and related services by wire transmission—specifically, by email. For example, on January 3, 2018, defendant **HYUN DONG JO** sent an email to the Defense

Logistics Agency attaching hundreds of forged laboratory analytical reports and an invoice seeking payment for these laboratory analytical reports and related transportation service.

8. Defendant **HYUN DONG JO**'s submission of this and other invoices for laboratory analytics and related services caused DFAS, located in the Southern District of Ohio, to wire money in interstate and foreign commerce to a bank account located in Korea.

9. The acts described above occurred in the Southern District of Ohio and elsewhere during the relevant period.

**ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE, SECTION 1343.**

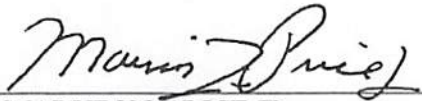
Dated: 1/15/21, 2021



MAKAN DELRAHIM  
Assistant Attorney General



RICHARD A. POWERS  
Deputy Assistant Attorney General



MARVIN N. PRICE JR.  
Director of Criminal Enforcement



JAMES J. FREDRICKS  
Chief, Washington Criminal II Section



MEGAN S. LEWIS  
Assistant Chief, Washington Criminal II  
Section



KATHERINE H. STELLA  
MELANIE KREBS-PILOTTI  
JULIA MALONEY

Antitrust Division  
U.S. Department of Justice

Trial Attorneys  
Antitrust Division  
U.S. Department of Justice  
450 5<sup>th</sup> St N.W.  
Washington DC 20530  
Tel: 202-705-8266  
katherine.stella@usdoj.gov

DAVID DEVILLERS  
U.S. Attorney, Southern District of Ohio



BRENDA SHOEMAKER  
Assistant United States Attorney  
United States Attorney's Office  
Southern District of Ohio