

UNITED STATES DISTRICT COURT
for the
District of New Jersey

ORIGINAL FILED
MAY 22 2026
CLERK, U.S. DISTRICT COURT - DNJ

United States of America
v.
So Yong Suh

Case No. 26-mj-4031

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 29, 2023 in the county of Camden in the
District of New Jersey, the defendant(s) violated:

<i>Code Section</i>	<i>Description of Offenses</i>
18 USC 1001	False Statements
	See Attachment A

This criminal complaint is based on these facts:

See Attachment B.

Continued on the attached sheet.

Andrew Miller

Complainant's signature

SA Andrew Miller, HSI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

telephone (specify reliable electronic means).

Date: 05/22/2026

Matthew J. Skahill

Judge's signature

City and state: Camden, New Jersey

Hon. Matthew J. Skahill, USMJ

Printed name and title

CONTENTS APPROVED
UNITED STATES ATTORNEY

Joseph McFarlane

By:

JOSEPH MCFARLANE
Assistant U.S. Attorney

Date: May 22, 2026

ATTACHMENT B

AFFIDAVIT

I, Andrew Miller, a Special Agent of Homeland Security Investigations (“HSI”) have knowledge of the following facts based on my own investigation and upon conversations with other individuals involved in this investigation. I have not included all of the facts known to me in this affidavit, just those facts which I believe necessary to establish probable cause. Where I assert that an event occurred on a particular date, I am asserting the event occurred on or about the date alleged. Where the contents of statements and conversations of others are set forth in this Affidavit, they are set forth in substance and in part, except where otherwise indicated:

BACKGROUND

Citizenship/Naturalization

1. A United States citizen is a native of the United States, a person naturalized in the United States, or a person who derived citizenship (from one or both parents); and who owes allegiance to the United States and is entitled to its full rights, privileges, and protection.

2. An alien is any person not a citizen or national of the United States. This includes immigrants (e.g., lawful permanent residents) and non-immigrants (e.g., individuals who are admitted to the United States for a temporary duration, such as a student, a visitor, or a temporary worker).

3. A lawful permanent resident (“LPR”) is an alien who has been conferred permanent resident status in the United States (colloquially known as a Green Card holder). An Alien Registration Receipt Card (also known as a Green Card) is issued to lawful permanent residents as evidence of their status.

Upon meeting the statutory prerequisites for naturalization, an LPR may apply to become a naturalized United States citizen.

4. U.S. Citizenship and Immigration Services (“USCIS”) is an agency within the Department of Homeland Security and is responsible for adjudicating applications for immigration benefits, including applications for naturalization. Immigration Services Officers (“ISOs”) are employees of USCIS.

Naturalization Procedures

5. An alien, who is an LPR, wishing to become a naturalized United States citizen must submit an application, Form N-400, Application for Naturalization, to the USCIS.

6. The N-400 is submitted under penalty of perjury. It contains, *inter alia*, the following questions (emphasis in original):

- a. Have you **EVER** been arrested, cited, or detained by any law enforcement officer (including an immigration official or any official of the U.S. armed forces) for any reason?
- b. Have you **EVER** been charged with committing, attempting to commit, or assisting in committing a crime or offense?
- c. Have you **EVER** been convicted of a crime or offense?
- d. Have you **EVER** given any U.S. Government officials **any** information or documentation that was false, fraudulent, or misleading?

7. At the end of the application, the following certification appears:

I certify, under penalty of perjury under the laws of the United States of America, that this application, and the evidence submitted with it are all true and correct.

8. After the alien submits the N-400 application, it is reviewed and an interview is conducted by an ISO, who determines the alien's qualifications for naturalization. The interview is conducted under oath, subject to the penalty of perjury. The ISO reviews with the alien each response the alien made in response to the questions contained in the N-400 application. The alien is permitted to amend her responses to the questions if anything has changed between the time the application was completed and the date of the interview. At the end of the interview the alien again signs the application in the presence of the ISO.

The Defendant

9. On April 6, 1974, the defendant, SO YONG SUH, a citizen of South Korea, was admitted into the United States and granted legal permanent residence. She was ten years old at the time.

The Defendant's Criminal History

10. On February 2, 2009, the defendant, SO YONG SUH, was arrested by the Evesham Township Police Department and charged in Burlington County Superior Court with Bad Checks, in violation of N.J. Rev. Stat. Ann. 2C:21-5(c)(2), a felony of the third degree. Court records show this matter was disposed of by a diversion program. The charge was ultimately dismissed, and the defendant received an aggregate sentence on December 7, 2009 of a \$150 fine.

11. On March 26, 2010, the defendant, SO YONG SUH, was arrested by the Fort Lauderdale Police Department and charged with Petit Theft, a second degree misdemeanor. She received a fine of \$50.

12. On December 23, 2015, the defendant, SO YONG SUH, was arrested by the Moorestown Township Police Department and charged with Shoplifting/Take Merchandise without Paying in violation of N.J. 2C:20-11(b)(1), which is a misdemeanor offense. She was convicted in Moorestown Township Municipal Court of the offense and, on April 6, 2016, was sentenced to 10 days of community service and fined \$1,155.

13. On December 29, 2015, the defendant, SO YONG SUH, was arrested by the Cherry Hill Township Police Department and charged with Shoplifting in violation of N.J. 2C:20-11(c)(3), a misdemeanor offense. She was convicted in the Municipal Court of Cherry Hill, New Jersey. On March 9, 2016, she was assessed a \$650 fine.

The Defendant's Bankruptcy Proceedings

14. The defendant, SO YONG SUH, filed for Chapter 13 bankruptcy protection on April 10, 2017 in the United States Bankruptcy Court in Camden. One of the questions on the bankruptcy proceeding asked whether the applicant was a party to any lawsuit. The defendant, SO YONG SUH, failed to disclose that she was the plaintiff in a pending personal injury lawsuit involving a motor vehicle accident. The defendant, SO YONG SUH, likewise failed to disclose this lawsuit in an amended bankruptcy filing and at a Meeting of Creditors held on June 22, 2017.

15. The defendant, SO YONG SUH, settled the personal injury lawsuit on March 18, 2018 in the amount of \$250,000. She failed to disclose this settlement in her bankruptcy proceedings.

16. Due to the defendant's failure to disclose the lawsuit and settlement, the Chapter 13 Standing Trustee sought and obtained dismissal of the bankruptcy proceedings. On January 15, 2020, the Court entered an order discharging the bankruptcy petition and closing the case.

The Defendant's Citizenship Application and Interview

17. On August 29, 2023, the defendant, SO YONG SUH, submitted Form N-400, Application for Naturalization, with USCIS. The defendant falsely answered "No" to the following questions:

- a. Have you **EVER** been arrested, cited, or detained by any law enforcement officer (including an immigration official or any official of the U.S. armed forces) for any reason?
- b. Have you **EVER** been charged with committing, attempting to commit, or assisting in committing a crime or offense?
- c. Have you **EVER** been convicted of a crime or offense?
- d. Have you **EVER** given any U.S. Government officials **any** information or documentation that was false, fraudulent, or misleading?

18. These answers were knowingly false due to the defendant's criminal and bankruptcy history discussed above.

19. On October 30, 2024, the defendant, SO YONG SUH, appeared at the USCIS office in Mount Laurel, New Jersey and was interviewed by an ISO regarding her eligibility for citizenship and her Form N-400. Prior to the commencement of the interview, the ISO placed the defendant, SO YONG SUH, under oath.

20. During the interview, and while under oath, the defendant, SO YONG SUH, affirmed her answers in her Form N-400 Application, including the "No" answers to the questions listed above in paragraph 17.

21. During the interview, the defendant, SO YONG SUH, was given the opportunity to correct any information on her Form N-400 Application. She declined to make any corrections and swore under penalty of perjury that her answers were true and correct. She then signed the application in the presence of the ISO.

Andrew Miller

Andrew Miller
Special Agent, HSI

Pursuant to Fed. R. Crim. P. 4.1, SA Miller was sworn and attested to the contents of this affidavit in support of the complaint and arrest warrant for Defendant So Yong Suh



HON. MATTHEW J. SKAHILL
United States Magistrate Judge

Date: May 22, 2026