

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA, : **CIVIL ACTION**
Plaintiff, : **No. 15-CV-_____**
v. :
A LIMITED PARTNERSHIP INTEREST :
HELD IN THE NAME OF OR FOR THE :
BENEFIT OF SANG AH PARK IN THE :
PHILADELPHIA U.S. IMMIGRATION :
FUND, :
Defendant. : **JURY TRIAL DEMANDED**

COMPLAINT FOR FORFEITURE IN REM

The plaintiff, United States of America, by its attorneys, Woo S. Lee and Della Sentilles, Criminal Division, United States Department of Justice, and Zane David Memeger, United States Attorney for the Eastern District of Pennsylvania, and J. Alvin Stout, III and Joseph F. Minni, Assistant United States Attorneys, in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure, for its complaint alleges as follows:

NATURE OF THE ACTION

1. This is a civil action *in rem* to forfeit and condemn to the use and benefit of the United States of America a limited partnership interest held in the name of or for the benefit of Sang Ah Park (“Park”) in the Philadelphia U.S. Immigration Fund (the “Defendant Asset”), pursuant to 18 U.S.C. § 981(a)(1)(A) and (C).

JURISDICTION AND VENUE

2. The plaintiff brings this action *in rem* in its own right to forfeit and condemn the Defendant Asset. This Court has jurisdiction over an action commenced by the United States of America under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

3. This Court has *in rem* jurisdiction over the Defendant Asset under 28 U.S.C. § 1355(b). Upon the filing of this complaint, the plaintiff requests that this Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

4. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1) and 28 U.S.C. § 1395(b), because a civil proceeding for the forfeiture of property may be prosecuted in any district where any of the acts or omissions giving rise to the forfeiture occurred.

THE DEFENDANT IN REM

5. The Defendant Asset is a limited partnership interest held in the name of or for the benefit of Park in the Philadelphia U.S. Immigration Fund that law enforcement officials seized on or about August 22, 2014, pursuant to seizure warrant issued by this Court in Case No. 14-M-833 E. D. Pa. This fund is created and/or overseen by PIDC Regional Center, LP XXVI (“PIDC”), a Pennsylvania limited partnership. PIDC is comprised of two-hundred and one (201) limited partners and one general partner, CanAm GP XXVI, LLC, a New York corporation. The Defendant Asset is identified in PIDC’s books and records as “Partner Number 116” and is a security that matured on or about September 1, 2014, and can be converted to approximately \$500,000 in cash. The Defendant Asset currently is restrained and will remain within the jurisdiction of this Court during the pendency of this action.

BASIS FOR FORFEITURE

6. The Defendant Asset is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) as it is property that constitutes or is derived from proceeds traceable to a violation of offenses constituting specified unlawful activities, including bribery of a foreign public official (18 U.S.C. § 1956(c)(7)(B)(iv)), or a conspiracy to commit such offenses.¹

7. The Defendant Asset is also forfeitable under 18 U.S.C. § 981(a)(1)(A) which provides that property involved in a transaction or an attempted transaction in violation of 18 U.S.C. § 1957, or property traceable to such assets, is also subject to forfeiture. Section 1957 prohibits the conducting of a monetary transaction with property known to be the proceeds of unlawful activity (i.e., the proceeds of a foreign offense involving bribery of a public official) with a value greater than \$10,000.

8. The Defendant Asset is also forfeitable under 18 U.S.C. § 981(a)(1)(A) which also provides that property involved in a transaction or an attempted transaction in violation of 18 U.S.C. § 1956(a)(1)(B), or property traceable to such assets, is subject to forfeiture. Section 1956(a)(1)(B) prohibits the conducting of a financial transaction with property known to be the proceeds of unlawful activity, including the proceeds of a foreign offense involving bribery of a public official, with the intent to conceal the nature, location, source, ownership, or control of proceeds of a specified unlawful activity.

EVIDENCE SUPPORTING FORFEITURE

9. All dates are “on or about” the date listed.

10. The Defendant Asset is traceable to corruption proceeds accumulated by Chun Doo-hwan (“President Chun”), former President of the Republic of Korea (“Korea”).

¹ Bribery involving public officials, among other offenses, is prohibited in the Republic of Korea by statute, including the Act on the Aggravated Punishment of Specific Crimes. *See* Attachment A.

11. President Chun solicited and accepted more than \$200 million in bribes from Korean businesses while serving as Korea's president between 1980 and 1988. At Chun's criminal trial in Korea, the leaders of several major Korean corporations testified that while President Chun was in power, their businesses were compelled to pay millions of dollars in bribes to President Chun to (i) avoid being retaliated against by President Chun's administration for not making such payments, and (ii) receive favorable treatment from President Chun's administration in exchange for making such payments. As a result, despite earning less than approximately 20 million Korean Won ("KRW") (approximately \$20,000) per year as Korea's president, President Chun amassed an enormous cache of assets, comprised of tens of millions of dollars worth of funds in bank accounts, securities and financial instruments, collectively called a "Secret Fund," that he concealed from the Korean government.

12. President Chun and his associates then further used this Secret Fund to launder President Chun's corruption proceeds through a web of assets and bank accounts controlled by multiple shell companies and nominees, including his father-in-law General Lee Kyu Dong ("General Lee") and Korea's National Security Planning Agency acting at President Chun's direction and for his benefit. Significant portions of the bribery proceeds were converted into bearer bonds.

13. Specifically, beginning in 2000, General Lee transferred more than \$20 million in the form of bearer bonds from President Chun's Secret Fund to Chun Jae Yong ("J.Y. Chun"), President Chun's son, and Park, J.Y. Chun's current wife. J.Y. Chun and Park used these funds to open dozens of bank accounts and acquire millions of dollars worth of assets in Korea and the United States, often in the names of various nominees. One of these assets was the Defendant Asset, which Park acquired in or around August 2008. To acquire the Defendant Asset, J.Y.

Chun and Park liquidated a portion of the bearer bonds traceable to President Chun's Secret Fund.

14. On August 22, 2014, the Honorable Jacob P. Hart, United States Magistrate Judge for the Eastern District of Pennsylvania, authorized the seizure of the Defendant Asset based on probable cause to believe that it was purchased with President Chun's corruption proceeds.

A. Background

15. On December 12, 1979, President Chun orchestrated a military coup d'etat against Korea's civilian government. Foreign media reported that armed forces loyal to President Chun killed thousands of civilians who attempted to protest President Chun's seizure of power, including two thousand civilians in the City of Kwangju in May 1980.

16. Soon after seizing power, President Chun declared martial law, dissolved the Korean parliament, and ordered the drafting of a new constitution. On August 27, 1980, in an election in which President Chun was the only candidate, Korea's electoral college elected President Chun as the country's new president.

17. After holding office for more than eight years, President Chun agreed to step down as president amidst civilian protests demanding free elections erupting in Seoul and several other Korean cities.

18. Other than his official salary as a public official and a military officer, President Chun has had no other source of significant legitimate income in his lifetime.

19. President Chun was tried and convicted in 1996 by the Seoul District Court in Korea of accepting hundreds of millions of dollars worth of bribes while in office. At trial, the leaders of several major Korean corporations testified that they paid millions of dollars worth of bribes to President Chun at the "Blue House," a complex of buildings which serves as the official

residence and executive office of the Korean president. As a result, President Chun was found to have accumulated corruption proceeds totaling approximately 220 billion KRW (approximately \$220 million at the time of President Chun's conviction in 1996).

20. In addition to bribery, President Chun was also charged and convicted in 1996 of murder, leading an insurrection against the republic, conspiring to commit an insurrection, participating in an insurrection, issuing illegal troop movement orders as an Army officer, and dereliction of duty.

21. For the offenses described in paragraph 19, the Seoul District Court sentenced President Chun to death. Additionally, because of the bribery conviction, President Chun was ordered to pay approximately KRW 220 billion (approximately \$220 million) in criminal restitution. On appeal, the Korean Supreme Court affirmed the convictions, including the bribery conviction, and entered a final order of judgment against President Chun on April 17, 1997, at which time President Chun began serving his prison sentence.

22. On December 22, 1997, President Kim Young-sam, Korea's then democratically-elected president, commuted President Chun's death sentence and released him from prison. President Kim's commutation of President Chun's sentence, however, did not affect the Seoul District Court's restitution order. As of August 2013, President Chun still owed KRW 167.2 billion (approximately \$167.2 million) under the 1996 criminal restitution order. Since 1997, President Chun has refused to comply with the Seoul District Court order and has insisted that he owns less than KRW 290,000 (approximately \$290) in assets.

President Chun's Receipt of Corrupt Payments

23. As set forth below, and established at trial in Korea through the testimony of representatives of major Korean corporations, between 1980 and 1988, President Chun directly

and indirectly solicited and received at least \$217 million worth of bribes and kickbacks from major Korean corporations while serving as president in order to (i) avoid being retaliated against by the Korean government for not making such payments, and (ii) receive favorable treatment by the government in exchange for making such payments.

24. Specifically, Tables 1A through 1G detail approximately \$217 million worth of bribes and kickbacks that President Chun was convicted of receiving.

Table 1A
KRW 3 Billion (Approx. \$3 Million) in Bribes
Paid to Chun Between 1980 and 1981

<u>Date of Bribe</u>	<u>Identity of Bribe Giver</u>	<u>Bribe Amount in Won/ Equivalent in U.S. Dollars</u>	<u>Details</u>
Nov. 1980	Cho Joong-hoon Hanjin Group (Parent company of Korean Airlines)	KRW 1 Billion/ \$1 Million	Bribe Paid at the Blue House - Safety House while discussing the crash of a Korean Airlines flight near Seoul
Spring 1981	Kim Woo-choong Daewoo Group	KRW 2 Billion/ \$2 Million	Bribe Paid in President Chun's Office at the Blue House

Table 1B
KRW 8 Billion (Approx. \$8 Million) in Bribes
Paid to Chun in 1982

<u>Date of Bribe</u>	<u>Identity of Bribe Giver</u>	<u>Bribe Amount in Won/ Equivalent in U.S. Dollars</u>	<u>Details</u>
Dec. 1982	Chung Ju-yung Hyundai Group	KRW 1 Billion/ \$1 Million	Bribe Paid at the Blue House
Dec. 1982	Lee Byung-chul Samsung Group	KRW 5 Billion/ \$5 Million	Bribe Paid in President Chun's Office at the Blue House
Dec. 1982	Kim Woo-choong Daewoo Group	KRW 2 Billion/ \$2 Million	Bribe Paid in President Chun's Office at the Blue House

Table 1C
KRW 16 Billion (Approx. \$16 Million) in Bribes
Paid to Chun in 1983

Date of Bribe	Identity of Bribe Giver	Bribe Amount in Won/ Equivalent in U.S. Dollars	Details
July 1983	Kim Jung-won Hanil Group	KRW 5 Billion/ \$5 Million	Bribe Paid at the Blue House-Safety House
July 1983	Kim Yong-san Kukdong Group	KRW 2 Billion/ \$2 Million	Bribe Paid in President Chun's Office at the Blue House
Oct. 1983	Cho Joong-hoon Hanjin Group	KRW 3 Billion/ \$3 Million	Bribe Paid in President Chun's Office at the Blue House - Safety House while discussing the downing of a Korean Airlines jet over the Soviet Union in 1983
Dec. 1983	Chung Ju-yong Hyundai Group	KRW 3 Billion/ \$3 Million	Bribe Paid at the Blue House
Dec. 1983	Lee Byung-chul Samsung Group	KRW 1 Billion/ \$1 Million	Bribe Paid at the Blue House
Dec. 1983	Kim Woo-choong Daewoo Group	KRW 2 Billion/ \$2 Million	Bribe Paid in President Chun's Office at the Blue House

Table 1D
KRW 26 Billion (Approx. \$26 Million) in Bribes
Paid to Chun 1984

Date of Bribe	Identity of Bribe Giver	Bribe Amount in Won/ Equivalent in U.S. Dollars	Details
June 1984	Kim Jung-won Hanil Group	KRW 5 Billion/ \$5 Million	Bribe Paid at the Blue House - Safety House
Oct. 1984	Jang Sang-tae Dongkuk Steel	KRW 2 Billion/ \$2 Million	Bribe Paid in the Blue House
Nov. 1984	Shin Kyuk-ho Lotte Group	KRW 1 Billion/ \$1 Million	Bribe Paid at the Blue House Reception Room
Nov. 1984	Kim Suk-won Ssangyong Group	KRW 1 Billion/ \$1 Million	Bribe Paid at the Blue House - Safety House while discussing government authorization for the company to build a golf

			resort in Kangwon province
Nov. 1984	Choi Soon-young Shindongah Group	KRW 1 Billion/ \$1 Million	Bribe Paid in President Chun's Office at the Blue House
Nov. 1984	Yang Chung-mo Kukje Group	KRW 1 Billion/ \$1 Million	Bribe Paid in President Chun's Office at the Blue House
Dec. 1984	Chung Ju-yong Hyundai Group	KRW 5 Billion/ \$5 Million	Bribe Paid in the Blue House - Safety House
Dec. 1984	Lee Byung-chul Samsung Group	KRW 1 Billion/ \$1 Million	Bribe Paid in the Blue House
Dec. 1984	Choi Won-suk Dongah Group	KRW 5 Billion/ \$5 Million	Bribe Paid in the Blue House - Safety House
Dec. 1984	Kim Woo-choong Daewoo Group	KRW 2 Billion/ \$2 Million	Bribe Paid in President Chun's Office at the Blue House
Dec. 1984	Kim Seoung-youn Hanhwa Group	KRW 2 Billion/ \$2 Million	Bribe Paid in the Blue House Reception Room

Table 1E
KRW 28.5 Billion (Approx. \$28.5 Million) in Bribes
Paid to Chun in 1985

Date of Bribe	Identity of Bribe Giver	Bribe Amount in Won/ Equivalent in U.S. Dollars	Details
Jan. 1985	Cho Joong-hoon Hanjin Group	KRW 2 Billion/ \$2 Million	Bribe Paid at the Blue House - Safety House
May 1985	S.W. Kim Ssangyong Group	KRW 1 Billion/ \$1 Million	Bribe Paid in the Blue House - Safety House
June 1985	Jang Young-shin Aekyung Group	KRW 1.5 Billion/\$1.5 Billion	Bribe Paid at the Blue House while discussing government authorization to construct a golf resort in Gyeonggi province
July 1985	J.W. Kim Hanil Group	KRW 5 Billion/ \$5 Million	Bribe Paid at the Blue House - Safety House
Sept. 1985	Lee Byung-chul Samsung	KRW 2 Billion/ \$2 Million	Bribe Paid in the Blue House
Sept. 1985	Park Sung-yop Kumho Group	KRW 2 Billion/ \$2 Million	Bribe Paid in Blue House Reception Room
Nov. 1985	Jang Sang-Tae Dongkuk Steel	KRW 1 Billion/ \$1 Million	Bribe Paid in the Blue House in the Form of a Promissory Note
Dec. 1985	Lee Byung-chul	KRW 2 Billion/ \$2 Million	Bribe Paid in the Blue House

	Samsung	\$2 Million	
Dec. 1985	Choi Won-suk Dongah Group	KRW 5 Billion/ \$5 Million	Bribe Paid in the Blue House - Safety House while discussing that company's bid to build the Second Lybia Man-made River Project in Korea
Dec. 1985	Kim Woo-choong Daewoo Group	KRW 2 Billion/ \$2 Million	Bribe Paid in President Chun's Office at the Blue House
Dec. 1985	Chung Ju-yong Hyundai Group	KRW 5 Billion/ \$5 Million	Bribe Paid in the Blue House - Safety House

Table 1F
KRW 42.5 Billion (Approx. \$42.5 Million) in Bribes
Paid to Chun in 1986

Date of Bribe	Identity of Bribe Giver	Bribe Amount in Won/ Equivalent in U.S. Dollars	Details
May 1986	Jang Sang-Tae Dongkuk Steel	KRW 3 Billion/ \$3 Million	Bribe Paid at the Blue House
Sept. 1986	Lee Byung-chul Samsung Group	KRW 3 Billion/ \$3 Million	Bribe Paid in the Blue House
Sept. 1986	Shin Kyuk-ho Lotte Group	KRW 3 Billion/ \$3 Million	Bribe Paid at the Blue House Reception Room
Sept. 1986	Park Sung-yop Kumho Group	KRW 2 Billion/ \$2 Million	Bribe Paid at the Blue House Reception Room
Sept. 1986	Koo Ja-Kyung Lucky Goldstar	KRW 5 Billion/ \$5 Million	Bribe Paid in the Blue House - Safety House
Dec. 1986	Chung Ju-yong Hyundai Group	KRW 2 Billion/ \$2 Million	Bribe Paid in Blue House- Safety House
Dec. 1986	Lee Byung-chul Samsung Group	KRW 3 Billion/ \$3 Million	Bribe Paid in the Blue House
Dec. 1986	S.Y. Kim Hanwa Group	KRW 2 Billion/ \$2 Million	Bribe Paid in the Blue House Reception Room
Dec. 1986	Choi Won-suk Dongah Group	KRW 5 Billion/\$5 Million	Bribe Paid in the Blue House - Safety House while discussing environmental regulation of certain lands owned by Dongah near Incheon, Korea
Dec. 1986	Chey Jong Hun SunKyong Group	KRW 5 Billion/ \$5 Million	Bribe Paid in Blue House Reception Room

Dec. 1986	Ryu Chan-woo Poongsan Group	KRW 1 Billion/ \$1 Million	Bribe Paid in the Blue House
Dec. 1986	Jang Chi-hyuk Kohap Group	KRW 500 Million / \$500,000	Bribe Paid in the Blue House Reception Room
Dec. 1986	S. W. Kim Ssangyong Group	KRW 1 Billion/ \$1 Million	Bribe Paid in the Blue House - Safety House
Dec. 1986	Lim Chang-wook Miwon Group	KRW 7 Billion/ \$7 Million	Bribe Paid in the Blue House while discussing the Korean National Tax Service's audit of the company

Table 1G
KRW 93 Billion (Approx. \$93 Million) in Bribes
Paid to Chun in 1987

Date of Bribe	Identity of Bribe Giver	Bribe Amount in Won/ Equivalent in U.S. Dollars	Details
Jan. 1987	Shin Kyuk-ho Lotte Group	KRW 1 Billion/ \$1 Million	Bribe Paid in the Blue House Reception Room
March 1987	Cho Joon-hoon Hanjin Group	KRW 5 Billion/ \$5 Million	Bribe Paid in the Blue House while discussing the Korean National Tax Service's audit of the Hanjin Group
May 1987	Jang Chi-hyuk Kohap Group	KRW 500 Million / \$500,000	Bribe Paid in the Blue House Reception Room
June 1987	Lee Byung-chul Samsung Group	KRW 5 Billion/ \$5 Million	Bribe Paid at the Blue House
June 1987	Kim Hyun-chul Sammi Group	KRW 2 Billion/ \$2 Million	Bribe Paid in the Blue House - Safety House
July 1987	Lee Jun-young Daelim Group	KRW 2 Billion/ \$2 Million	Bribe Paid in Blue House - Safety House
Aug. 1987	S.W. Kim SSangyong Group	KRW 3 Billion/ \$3 Million	Bribe Paid in the Blue House - Safety House
Sept. 1987	Chey SunKyong Group	KRW 5 Billion/ \$5 Million	Bribe Paid in the Blue House Reception Room
Sept. 1987	S.Y. Kim Hanwa Group	KRW 3 Billion/ \$3 Million	Bribe Paid in the Blue House Reception Room
Sept. 1987	Park Kumho Group	KRW 3 Billion/ \$3 Million	Bribe Paid in the Blue House Reception Room
Sept. 1987	Cho Sook-rae	KRW 3 Billion/ \$3 Million	Bribe Paid in the Blue House

	Hyosung Group	\$3 Million	
Sept. 1987	Kim Sun-hong Kia Group	KRW 2 Billion/ \$2 Million	Bribe Paid in Chun's Office at the Blue House
Sept. 1987	Park Young-joon Chunhung Group	KRW 1 Billion/ \$1 Million	Bribe Paid in Chun's Office at the Blue House
Oct. 1987	Park Yong-gon Doosan Group	KRW 1 Billion/ \$1 Million	Bribe Paid in the Blue House Reception Room
Oct. 1987	Kim Young-san Kukdong Group	KRW 2 Billion/ \$2 Million	Bribe Paid in the Blue House
Oct. 1987	Choi Soon-young Shindongah Group	KRW 1 Billion/ \$1 Million	Bribe Paid in President Chun's Office at the Blue House
Oct. 1987	Baek Yeong-gi TongKook Group	KRW 1 Billion/ \$1 Million	Bribe Paid in the Blue House Reception Room
Oct. 1987	Choi Won-Suk Dongah Group	KRW 3 Billion/ \$3 Million	Bribe Paid in Chun's Office at the Blue House
Oct. 1987	Lee Dong Chan Kolon Group	KRW 2 Billion/ \$2 Million	Bribe Paid in the Blue House Safety House
Oct. 1987	Park Yong-hak Daenon Group	KRW 2 Billion/ \$2 Million	Bribe Paid in Chun's Office at the Blue House
Oct. 1987	Shin Kyuk-ho Lotte Group	KRW 5 Billion/ \$5 Million	Bribe Paid in the Blue House Reception Room
Oct. 1987	Koo Ja-Kyung Lucky Goldstar	KRW 5 Billion/ \$5 Million	Bribe Paid in the Blue House Safety House
Oct. 1987	Kim Woo-choong Daewoo Group	KRW 5 Billion/ \$5 Million	Bribe Paid in President Chun's Office at the Blue House
Oct. 1987	Cho Joong-hoon Hanjin Group	KRW 5 Billion/ \$5 Million	Bribe Paid in the Blue House Safety House
Oct. 1987	Chey Jong Hun Sunkyoung Group	KRW 5 Billion/ \$5 Million	Bribe Paid in the Blue House Reception Room
Nov. 1987	Shin Kyuk-ho Lotte Group	KRW 5 Billion/ \$5 Million	Bribe Paid in the Blue House Reception Room
Nov. 1987	Kim Jun-ki Dongbu Group	KRW 2 Billion/ \$2 Million	Bribe Paid in the Blue House Reception Room
Nov. 1987	Choi Moo Young Geunyoung Nongsan Group	KRW 1 Billion/ \$1 Million	Bribe Paid in Chun's Office at the Blue House
Nov. 1987	Han Young-ja Samyang Chemical	KRW 10 Billion/ \$10 Million	Bribe Paid in President Chun's Office at the Blue House
Dec. 1987	Chung Ju-yong	KRW 1 Billion/ \$1 Million	Bribe Paid in the Blue House

	Hyundai Group	\$1 Million.	
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25. The corruption payments set forth in Tables 1A through 1G were funneled into President Chun's Secret Fund, which was comprised of a portfolio of bank accounts and assets maintained in the names of various shell companies and nominees.

26. While President Chun was in office between 1980 and 1988, his Secret Fund was managed by Kim Jong Sang, the Blue House Presidential Security Office's financial secretary. Some of these funds were laundered through accounts in Korea controlled by the Korean National Security Planning Agency and opened in the names of various shell companies, including Woojoo Hongbo Company and the Taeyang Munhwa Association.

27. After leaving office in 1988, President Chun transferred millions of dollars from the Secret Fund to General Lee, his father-in-law. When President Chun was questioned by Korean prosecutors (the "Korean Prosecutor") in 2004, he explained that he "gave money to [General Lee] in 1996, because [President Chun] feared that there may be a misunderstanding and that the money may be seized later, if [he] had a lot of money while [he] was being investigated" for corruption during the 1990s.

B. Between 2000 and 2003, General Lee Transferred Approximately \$23 Million in Cash and Bearer Bonds Traceable to President Chun's Secret Fund to J.Y. Chun

28. In spite of the fact that President Chun claimed to own less than \$290 in assets in 1997, beginning in 2000, General Lee undertook a series of transactions that resulted in approximately \$23 million of President Chun's assets, mainly in the form of bearer bonds,² to be given to J.Y. Chun, the former President's son.

² Bearer bonds are unregistered financial debt securities issued by a financial institution or corporation. The bonds are redeemable in cash by the person or entity in physical possession of the unregistered note.

29. J.Y. Chun completed his undergraduate education at Georgetown University in 1988 and studied at Keio University in Japan between 1994 and 1999, where he earned a master's degree and a doctorate in economic accounting. After graduating from Keio University at the age of 38, J.Y. Chun worked between 1999 and 2000 at Daewoo Securities. Prior to 1999 when he graduated from Keio University, J.Y. Chun was a full-time student and not gainfully employed for any significant period of time.

30. Between 2000 and 2003 (the "Relevant Period"), J.Y. Chun received more than \$23 million worth of currency and bearer bonds traceable to President Chun's Secret Fund from his maternal grandfather, General Lee.

31. With the assistance of his then friend and business partner Ryu Chang-hee ("Ryu"), J.Y. Chun attempted to conceal these assets in Korea in dozens of accounts ("J.Y. Chun Fund Nominee Accounts") opened in the names of nearly two dozen different family members, friends, and associates ("J.Y. Chun Fund Nominees"), including:

1. Park Sang-ah (J.Y. Chun's second and present wife);
2. Yoon Yang-ja (Park's mother);
3. Kim Cheul-soo (Ryu's friend);
4. Ryu Bong-soo (Ryu's father);
5. Kim Gui-rye (Ryu's mother);
6. Kim Moon-ja (Ryu's aunt);
7. Kim Tae-eun (Ryu's aunt's daughter-in-law);
8. Kim Soo-chang (Ryu's friend);
9. Eom Seung-tae (Ryu's friend);
10. Kim Do-sung (Ryu's friend);
11. Oh Dong-hwan (Ryu's friend);
12. Kim Sung-hyun (Ryu's friend);
13. Kim Kang-hun (Ryu's friend);
14. Jin Sung-il (Ryu's friend);

15. Byun Joong-ho (Ryu's friend);
16. Ahn Byung-kuk (Ryu's associate);
17. Cha Tae-seon (Ryu's associate);
18. Oh Sang-jin (Ryu's associate);
19. Lee Joong-yeob (Ryu's associate);
20. Kim Won-kyung (Ryu's associate); and
21. Kwon Gi-rak (J.Y. Chun's business associate).

32. As set forth in part below, during the Relevant Period, J.Y. Chun, Ryu, and the J.Y. Chun Fund Nominees engaged in a series of transactions in which millions of dollars worth of bearer bonds traceable to President Chun's Secret Fund were redeemed and used to open multiple J.Y. Chun Fund Nominee Accounts in Korea.

33. When J.Y. Chun was questioned in 2013 by the Korean Prosecutor about the funds he maintained in these J.Y. Chun Fund Nominee Accounts, he made several statements. At times, he denied recalling the sources of the funds; but he also acknowledged that the funds in these accounts originated from "[his] father's money." Although J.Y. Chun initially claimed to the Korean Prosecutor that he "never thought of the money [in the Secret Fund Nominee Accounts] as belonging to [his] father," he later acknowledged to the Korean Prosecutor, "I always thought of [the funds in the J.Y. Chun Nominee Accounts] unconditionally as my father's money. It is true that I did as such. I am very sorry about that now."

34. Ryu, a close friend and business partner of J.Y. Chun, corroborated J.Y. Chun's admissions that the funds maintained in these Secret Fund Nominee Accounts originated from President Chun's Secret Fund. Ryu explained to the Korean Prosecutor in 2013 that the funds in these accounts were traceable to President Chun's Secret Fund and that J.Y. Chun had no source of substantial income during the Relevant Period other than his father's Secret Fund. Likewise, Ryu informed the Korean Prosecutor in 2013 that, "I heard from Kang Shin Hak that [during the

Relevant Period, J.Y. Chun] was managing former President Chun Doo Hwan's money” Kang Shin Hak, according to Ryu, was a close friend, high school classmate, and business partner of J.Y. Chun, who was familiar with J.Y. Chun's financial activities at that time.

35. **December 2000 Transaction:** In or around December 2000, J.Y. Chun received approximately KRW 7.355 billion (approximately \$7.355 million) in National Housing Corporation bearer bonds (“Housing Bonds”) from General Lee. According to Ryu, these Housing Bonds were acquired with funds traceable to President Chun's Secret Fund.³ Indeed, President Chun also admitted to the Korean Prosecutor that these Housing Bonds were acquired with his funds.

36. Soon after receiving these Housing Bonds, in or around December 19, 2000, J.Y. Chun instructed Ryu to distribute KRW 1.3 billion (approximately \$1.3 million) in cash to various J.Y. Chun Fund Nominees. Ryu distributed these funds in KRW 50 million (approximately \$50,000) increments and caused them to be deposited into twenty-six (26) different Secret Fund Nominee Accounts. Within two days of these funds being deposited, Ryu then withdrew on J.Y. Chun's behalf KRW 700 million (approximately \$700,000) of these funds in cash and returned these proceeds to J.Y. Chun's custody.

37. **June 2001 Transaction:** In June 2001, J.Y. Chun asked Ryu to find additional nominees who would be willing to redeem an additional KRW 1.5 billion (approximately \$1.5 million) in bearer bonds on his behalf. Ryu recruited fourteen individuals to redeem these bonds on J.Y. Chun's behalf. These individuals included Ryu's mother, Ryu's maternal aunt, the

³ In addition to the KRW 7.355 billion in Housing Bonds provided to J.Y. Chun by President Chun, J.Y. Chun also received an additional KRW 9.34 billion (approx. \$9.34 million) in “National Housing” bonds from General Lee. Although Korean prosecutors alleged in 2004 that these bonds were acquired with funds from President Chun's Secret Fund, the Korean Prosecutor was unable to obtain a conviction as to these additional allegations. When the Korean Prosecutor again inquired of J.Y. Chun in 2013 how these bonds were purchased by General Lee, J.Y. Chun could provide no explanation as to the source of the funds used to acquire these bonds.

daughter-in-law of Ryu's maternal aunt, former colleagues of Ryu from the military, and various friends and third parties. After Ryu distributed the bonds to these individuals in increments of between KRW 50 million (approximately \$50,000) and KRW 100 million (approximately \$100,000), these Secret Fund Nominees, in turn, redeemed the relevant bonds and provided the proceeds to Ryu, who then provided the funds to J.Y. Chun in the form of bank checks.

38. **September 2001 Transaction:** In September 2001, Ryu asked Kim Cheul-soo, a friend of his, to open a brokerage account at E-Trade (the "Nominee E-Trade Account"), a stock brokerage firm with offices in Seoul, in order to redeem and hold additional bearer bonds for J.Y. Chun. Soon after opening this account, J.Y. Chun asked Ryu to redeem a bearer bond worth KRW 4.3 billion (approximately \$4.3 million) through the Nominee E-Trade Account. J.Y. Chun, according to Ryu, waited outside and declined to enter E-Trade's offices while Ryu was inside redeeming the aforementioned bond and depositing the proceeds into an account. Later that month, Kwon Gi-rak ("Kwon"), J.Y. Chun's business associate and friend, withdrew these funds and delivered the proceeds directly to J.Y. Chun.

39. **September 10, 2001, Transaction:** Again, on September 10, 2001, J.Y. Chun asked Ryu to use the Nominee E-Trade Account to redeem an additional KRW 8.4 billion (approximately \$8.4 million) in bearer bonds. Like the last time, J.Y. Chun waited outside in his car while Ryu entered E-Trade's offices to redeem the bonds and then deposited the proceeds. Later that month, Kwon was again directed by J.Y. Chun to withdraw these funds and deliver the proceeds directly to him.

40. **March 19, 2002, Transaction:** On March 19, 2002, approximately 14 months before J.Y. Chun acquired some real property in the U.S. in Alpharetta, Georgia (the "Georgia Property"), J.Y. Chun asked that Ryu use the Nominee E-Trade account a third time to redeem a

bond with a value of KRW 1 billion (approximately \$1 million). Again, J.Y. Chun waited outside while Ryu went inside E-Trade's offices to redeem the bond and deposit the proceeds on J.Y. Chun's behalf. Later that month, Kwon again withdrew these funds and delivered the proceeds directly to J.Y. Chun.

41. In 2004, the Korean Prosecutor investigated and charged J.Y. Chun for criminal tax evasion because of his failure to report the funds he received from President Chun's Secret Fund, including approximately KRW 7.355 Billion (approximately \$7.355 million) in Housing Bonds he received in December 2000 from his grandfather General Lee. It was alleged that these Housing Bonds were purchased with funds traceable to President Chun's Secret Fund. J.Y. Chun was ultimately convicted at trial and received a suspended sentence of 30 months imprisonment for this offense.

C. J.Y. Chun Used Funds in the Secret Fund Nominee Accounts to Acquire Assets and Make Further Investments in Korea

42. Within three years of finishing school, during which time he was not employed, J.Y. Chun used the funds in the Secret Fund Nominee Accounts to acquire assets in Korea, including a home in Seoul and three townhomes in the Junart Vill complex ("Junart Units"), also in Seoul, valued at approximately \$2.6 million. J.Y. Chun also invested KRW 700 million (approximately \$700,000) in Ware Valley, Inc. ("Ware Valley"), his failed technology firm. J.Y. Chun appointed Ryu to be the firm's chief executive officer. According to Ryu, however, Ware Valley never generated a profit.

43. In attempting to conceal his acquisition of these Korean assets, J.Y. Chun held these assets in the names of nominees. For instance, in acquiring the Junart Units, J.Y. Chun instructed Ryu to title these properties in Ryu's father's name. Ryu explained to the Korean

Prosecutor in 2013 that the Junart Units were titled in his father's name because J.Y. Chun did not possess sufficient legitimate income to explain his acquisition of such assets, and J.Y. Chun wished to, in J.Y. Chun's words, "dodge suspicion."

44. In addition to the Junart Units, J.Y. Chun and Park also acquired the Georgia Property in May 2003 for \$365,000. After selling the Georgia Property in 2004 for \$403,000, J.Y. Chun used the proceeds of the Georgia Property sale in part to invest \$896,000 in equity in his acquisition of a home in Newport Beach, California, which he purchased for \$2,240,000 (the "California Property"). Both the California Property and the Georgia Property were titled in the names of two different legal trusts. The mother of J.Y. Chun's then girlfriend, Sang Ah Park, was the nominal trustee of both trusts.

D. The Defendant Asset Is Traceable to Chun's Secret Funds

45. During the same time period that J.Y. Chun received approximately \$23 million worth of funds traceable to his father's Secret Fund, J.Y. Chun opened multiple bank accounts in the United States, secretly funneling hundreds of thousands of dollars traceable to President Chun's Secret Fund into the U.S. financial system to acquire assets, including the Defendant Asset and the Georgia and California properties.

46. Specifically relating to the Defendant Asset, J.Y. Chun and Park laundered and used funds traceable to President Chun's Secret Fund, to acquire bearer bonds worth approximately \$2.1 million (the "Relevant Bearer Bonds") in Korea in 2001. J.Y. Chun and Park then liquidated the Relevant Bearer Bonds on or about July 14, 2006, and concealed the proceeds of the liquidation in the bank accounts of J.Y. Chun's two then-minor sons—Chun Woo Sung and Chun Woo Won—before using approximately \$530,000 of these proceeds to acquire the Defendant Asset from PIDC on or about April 9, 2009.

47. J.Y. Chun possessed no significant source of income other than funds traceable to President Chun's Secret Fund at the time he purchased the Relevant Bearer Bonds in 2001. Indeed, as described in Table 1 below, J.Y. Chun's income by his own admission to the Korean government was less than \$38,000 per year from 1999 through 2001, woefully less than an annual amount necessary to acquire the more than \$20 million in assets held by nominees for J.Y. Chun's benefit during the Relevant Period. Specifically, J.Y. Chun reported in his tax filings with the Korean government that he earned the following net income:

Table 1
J.Y. Chun's Reported Net Income
1999-2002

Tax Year	Amount Reported (in KRW)	Amount Reported (Approx. U.S.D. Equivalent)
1999	37,757,137	\$37,757
2000	30,034,887	\$30,034
2001	33,174,432	\$33,174
2002	24,660,760	\$24,660

48. Although J.Y. Chun owned two software companies during the Relevant Period—Ware Valley in Korea and OR Solutions in Georgia—neither firm generated any profit. Indeed, OR Solutions, according to its former chief executive officer, never generated any revenue at all and incurred substantial financial losses.

49. Similarly, according to Ware Valley's C.E.O., Ware Valley was not profitable in Korea during the Relevant Period, and J.Y. Chun's only source of available funds and income during the Relevant Period was President Chun's Secret Fund.

1. Park Acquired the Defendant Asset With Proceeds of the Relevant Bearer Bonds Purchased in 2001 Using Funds Traceable to President Chun's Secret Fund

50. Park acquired the Defendant Asset with funds traceable to J.Y. Chun's sale of the Relevant Bearer Bonds on or about July 14, 2006. The Relevant Bearer Bonds, which J.Y. Chun acquired in approximately 2001, were identified with sequential serial numbers ranging from (i) A00004701F through A00004800F; (ii) A00003641F through A00003700F; and (iii) A00004251F through A00004300F.

51. On July 14, 2006, J.Y. Chun liquidated the Relevant Bearer Bonds for KRW 2,728,504,442 (approximately \$2,728,504) at the Gangnam Branch of the Korea Securities Finance Corporation. Specifically, J.Y. Chun liquidated the below-referenced bonds:

Table 2
Value of the Relevant Bearer Bonds

Number of Bearer Bonds	Serial Number of Bearer Bonds	Individual Value of Each Bearer Bond	Approx. Combined Net Value in KRW/ U.S. Dollars
100	A00004701F – A00004800F	KRW 10 million	KRW 1,299,287,823 / \$1,299,287
60	A00003641F – A00003700F	KRW 10 million	KRW 779,572,698 / \$779,572
50	A00004251F – A00004300F	KRW 10 million	KRW 649,643,921 / \$649,643

52. On or about August 10, 2006, J.Y. Chun deposited KRW 1,000,000,000 (approximately \$1,000,000) of the monies he obtained from liquidating the Relevant Bearer Bonds into an account at Hana Bank in Korea maintained in the name of Woo Sung Chun, J.Y. Chun's then minor son. An additional KRW 1,000,000,000 (approximately \$1,000,000) from these same proceeds were deposited into another account at Hana Bank maintained in the name of Woo Won Chun, another of J.Y. Chun's then minor sons. At the time these transactions occurred, Woo Won Chun was ten (10) years old and Woo Sung Chun was twelve (12) years old.

53. On August 4, 2008, KRW 271 million (approximately \$271,000) each was transferred from the accounts of Woo Sung Chun and Woo Won Chun at Hana Bank to J.Y. Chun's account at Hana Bank. Later that same day, KRW 539,332,500 (approximately \$539,332) of these same funds were transferred to Park's bank account at Korea Exchange Bank in Korea before being deposited into PIDC's escrow account at Korea Exchange Bank pursuant to an escrow agreement entered into between PIDC and Park (the "PIDC Escrow Agreement"). The funds in the PIDC escrow account were then used to acquire the Defendant Asset.

54. Neither J.Y. Chun nor Park reported sufficient income to explain the family's acquisition and ownership of more than \$20 million in assets, including the Relevant Bearer Bonds, during the Relevant Period. J.Y. Chun was not gainfully employed and possessed no source of substantial income other than funds traceable to President Chun's Secret Fund at the time he obtained the Relevant Bearer Bonds which were liquidated and used to acquire the Defendant Asset in 2009. As is set forth below, neither did his wife, Park, in whose name the Defendant Asset is held, have sufficient income or other sources of funds to purchase the Relevant Bearer Bonds.

55. When J.Y. Chun was asked by the Korean Prosecutor in 2013 how he accumulated more than \$20 million in assets in Korea and the United States during the Relevant Period, he responded either by admitting that he received millions of dollars worth of funds from his father's Secret Fund or by contending that he could not recall. Likewise, J.Y. Chun acknowledged that he used the bank accounts of various nominees, including Park's mother, to execute international wire transfers into the United States in 2003 because he could not identify a legitimate source for his own funds.

56. Park further corroborated J.Y. Chun's representations, explaining to the Korean Prosecutor in 2013 that J.Y. Chun used a bank account in her mother's name to send funds into the United States because her husband "had no money with a source that could be shown." Park further explained: "[B]efore going to the U.S. [in 2003, J.Y. Chun] had to take money with him to buy a house and for living expenses, and [J.Y. Chun] said that if he sent money to the U.S. the source would be obvious; since [J.Y. Chun's] money had no source, in order to transfer money with a source" he used her mother's account.

57. Ryu, J.Y. Chun's former business partner, also confirmed to the Korean Prosecutor in 2013 that in 2001 (the year J.Y. Chun acquired the Relevant Bearer Bonds), "[J.Y. Chun] didn't have a particular job or income. He didn't have to borrow money from anyone since it was sufficient for him to live off of his father's Secret funds."

58. As described in Table 3 below, Park's net income is insufficient to be the source of her family's acquisition and ownership of more than \$20 million in assets, including the Relevant Bearer Bonds, during the Relevant Period. Specifically, Park reported in her tax filings with the Korean government that she earned the following net income:

Table 3
Park's Reported Net Income
1999-2002

Tax Year	Amount Reported (in KRW)	Amount Reported (Approx. U.S.D. Equivalent)
1995	24,855,449	\$24,855
1996	40,171,997	\$40,171
1997	9,581,947	\$9,581
1998	19,181,104	\$19,181
1999	17,071,243	\$17,071
2000	23,424,365	\$23,424
2001	125,708,849	\$125,708
2002	60,669,546	\$60,669

FOREIGN LAW
BASIS FOR FORFEITURE

59. Bribery of a public official is a criminal offense under Korean law, as enumerated by the Korean Criminal Code, including but not limited to Article 129 (bribery); Article 130 (bribery of third persons); Article 131 (improper action after acceptance of bribe and subsequent bribery); and Article 132 (acceptance of bribes through good offices). English translations of these provisions are set forth in Attachment A.

FIRST CLAIM FOR RELIEF

18 U.S.C. § 981(a)(1)(C)

60. Paragraphs 1 through 59 above are incorporated by reference as if fully set forth herein.

61. The Defendant Asset is property that constitutes, or is derived from, proceeds traceable to a foreign offense involving bribery of a public official (18 U.S.C. § 1956(c)(7)(B)(iv)), which is a specified unlawful activity under 18 U.S.C. §§ 1956(c)(7)(B)(iv), and a conspiracy to commit such offenses.

62. Therefore, the Defendant Asset is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

SECOND CLAIM FOR RELIEF

18 U.S.C. § 981(a)(1)(A)

63. Paragraphs 1 through 62 above are incorporated by reference as if fully set forth herein.

64. The Defendant Asset is involved in, or is traceable to property involved in, a transaction or attempted transaction in violation of section 18 U.S.C. § 1957. Specifically, the

Defendant Asset is involved in or is traceable to a monetary transaction in criminally derived property of a value greater than \$10,000, that is a foreign offense involving bribery of a public official (18 U.S.C. § 1956(c)(7)(B)(iv)).

65. Accordingly, the Defendant Asset is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A).

THIRD CLAIM FOR RELIEF

18 U.S.C. §981(a)(1)(A)

66. Paragraphs 1 through 65 above are incorporated by reference as if fully set forth herein.

67. The Defendant Asset is involved in, or is traceable to property involved in, a transaction or attempted transaction in violation of section 18 U.S.C. § 1956(a)(1)(B)(i). Specifically, the Defendant Asset is involved in or traceable to a financial transaction involving the proceeds of specified unlawful activities, that is a foreign offense involving bribery of a public official (18 U.S.C. § 1956(c)(7)(B)(iv)), and which was designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership or the control of the proceeds of the specified unlawful activities in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

68. Accordingly, the Defendant Asset is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A).

FOURTH CLAIM FOR RELIEF

18 U.S.C. §981(a)(1)(A)

69. Paragraphs 1 through 68 above are incorporated by reference as if fully set forth herein.

70. The Defendant Asset is involved in, or is traceable to property involved in, a transaction or attempted transaction in violation of section 18 U.S.C. § 1956(a)(2)(B).

Specifically, the Defendant Asset is, or is traceable to funds that were, transported, transmitted, or transferred to a place in the United States from or through a place outside the United States, knowing that the funds involved in the transportation, transmission, or transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, or transfer is designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activities, that is a foreign offense involving bribery of a public official (18 U.S.C. § 1956(c)(7)(B)(iv)).

71. Accordingly, the Defendant Asset is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A).

FIFTH CLAIM FOR RELIEF
(18 U.S.C. §981(a)(1)(A))

72. Paragraphs 1 through 71 above are incorporated by reference as if fully set forth herein.

73. The Defendant Asset is involved in, or is traceable to property involved in, a conspiracy to launder the proceeds of specified unlawful activities in violation of 18 U.S.C. § 1956(h). Specifically, the Defendant Asset is involved in, or is traceable to funds that were involved in, a conspiracy: (1) to conduct and/or attempt to conduct financial transactions which involve the proceeds of specified unlawful activities, that is (i) a foreign offense involving bribery of a public official (18 U.S.C. § 1956(c)(7)(B)(iv)), in violation of 18 U.S.C. § 1956(a)(1)(B)(i); (2) to engage and/or attempt to engage in monetary transactions in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activities, that is (i) a foreign offense involving bribery of a public official (18 U.S.C. § 1956(c)(7)(B)(iv)), in violation of 18 U.S.C. § 1957; and (3) to transport, transmit, or transfer to a place in the United States from or through a place outside the United States,

knowing that such transportation, transmission, or transfer is designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activities, that is (i) a foreign offense involving bribery of a public official (18 U.S.C. § 1956(c)(7)(B)(iv)), in violation of 18 U.S.C. § 1956(a)(2)(B)(i).

74. Accordingly, the Defendant Asset is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A).

WHEREFORE, the plaintiff, United States of America, requests:

1. The Defendant Asset be proceeded against according to the law and the rules of this Court, and that due notice be given to all the interested parties to appear and show cause why forfeiture should not be decreed.

2. The Court, for the reasons set forth herein, adjudge and decree that the Defendant Asset be forfeited to the United States of America and disposed of in accordance with existing laws, together with costs, and for such other relief as this Court deems proper and just.

Respectfully submitted,

Date: February 18, 2015.

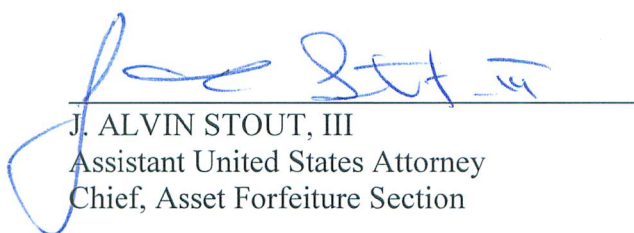
M. KENDALL DAY, ACTING CHIEF
ASSET FORFEITURE AND MONEY
LAUNDERING SECTION
Criminal Division
United States Department of Justice



DANIEL CLAMAN, Assistant Deputy Chief
WOO S. LEE, Trial Attorney
DELLA G. SENTILLES, Trial Attorney
Criminal Division
United States Department of Justice

OF COUNSEL:

ZANE DAVID MEMEGER
United States Attorney



J. ALVIN STOUT, III
Assistant United States Attorney
Chief, Asset Forfeiture Section



JOSEPH F. MINNI
Assistant United States Attorney

Attorneys for Plaintiff United States of America

Date: February 18, 2015.

VERIFICATION

GEOFFREY I. GORDON, being of legal age, verifies, and pursuant to 28 U.S.C. § 1746(2), declares and states as follows:

1. I am a special agent with Homeland Security Investigations, U.S. Department of Homeland Security, and am assigned to the investigation in this case.
2. I have reviewed the foregoing Verified Complaint for Forfeiture *in Rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.
3. The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, publicly available files and historical information, files and records compiled by the Supreme Prosecutor's Office of the Republic of Korea, the Ministry of Justice of the Republic of Korea and the Seoul Central District Prosecutor's Office, information supplied to me by other law enforcement officers, experts, and other witnesses, as well as my investigation of this case, together with others, as a special agent.

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

Executed on February 18, 2015.



GEOFFREY I. GORDON
Special Agent
Homeland Security Investigations

ATTACHMENT A

Relevant Bribery Provisions of the Korean Criminal Code

Chapter VII Crimes Concerning the Duties of Public Officials:

Article 129 (Acceptance of Bribe and Advance Acceptance)

A public official or an arbitrator who receives, demands or promises to accept a bribe in connection with his duties, shall be punished by imprisonment for not more than five years or suspension of qualifications for not more than ten years.

Article 130 (Bribe to Third Person)

A public official or an arbitrator who causes, demands or promises a bribe to be given to a third party on acceptance of an unjust solicitation in connection with his duties shall be punished by imprisonment for not more than five years or suspension of qualifications for not more than ten years.

Article 131 (Improper Action after Acceptance of Bribe and Subsequent Bribery)

- (1) If a public official or an arbitrator takes an improper action after committing the offenses under the preceding two Articles, imprisonment for a limited term of not less than one year shall be imposed.
- (2) If a public official or an arbitrator receives, demands or promises to receive a bribe, or causes, demands or promises a bribe to be given to a third party, after taking an improper action in the course of performing his duties, the punishment specified in the preceding paragraph shall be imposed.

Article 132 (Acceptance of Bribe through Good Offices)

A public official who, by taking advantage of his post, receives, demands or agrees to receive a bribe concerning the use of the good offices in connection with the affairs which belong to the functions of another public official, shall be punished by imprisonment for not more than three years or suspension of qualifications for not more than seven years.

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

United States of America

AB

(b) County of Residence of First Listed Plaintiff N/A (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) U.S. Department of Justice Criminal Division - Asset Forfeiture & Money Laundering Section 1400 New York Ave. NW, Washington D.C. 20530 Phone: 202-514-1263 Woo Lee and Della Sentilles, Trial Attorneys

DEFENDANTS

A LIMITED PARTNERSHIP INTEREST HELD IN THE NAME OF OR FOR THE BENEFIT OF SANG AH PARK IN THE PHILADELPHIA U.S. IMMIGRATION FUND

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known) N/A

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State PTF DEF
Citizen of Another State PTF DEF
Citizen or Subject of a Foreign Country PTF DEF

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Table with 5 main categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER/STATUTES. Includes various sub-categories like Personal Injury, Labor Standards, etc.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 18 U.S.C. Section 981
Brief description of cause: Civil action to forfeit property

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMANDS N/A CHECK YES only if demanded in complaint. JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

JUDGE N/A DOCKET NUMBER N/A

DATE 02/18/2015 SIGNATURE OF ATTORNEY OF RECORD [Signature] For Della G. Sentilles FEB 18 2015

FOR OFFICE USE ONLY RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

FOR THE EASTERN DISTRICT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

15 814

Address of Plaintiff: Department of Justice, Criminal Division, Asset Forfeiture and Money Laundering Section, 1400 New York Avenue NW, Washington D.C. 20530

Address of Defendant: PIDC Regional Center, LP XXCI, 1500 Market Street, 2600 Centre Square West, Philadelphia, PA 19102

Place of Accident, Incident or Transaction: Philadelphia, PA

(Use Reverse Side for Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a))

Yes No

Does this case involve multidistrict litigation possibilities?

Yes No

RELATED CASE, IF ANY:

Case Number: N/A Judge: N/A Date Terminated: N/A

Civil cases are deemed related when yes is answered to any of the following questions:

- 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?

CIVIL: (Place check in ONE CATEGORY ONLY)

A. Federal Question Cases:

- 1. Indemnity Contract, Marine Contract, and All Other Contracts
2. FELA
3. Jones Act-Personal Injury
4. Antitrust
5. Patent
6. Labor-Management Relations
7. Civil Rights
8. Habeas Corpus
9. Securities Act(s) Cases
10. Social Security Review Cases
11. All other Federal Question Cases (Please specify) Asset Forfeiture

B. Diversity Jurisdiction Cases:

- 1. Insurance Contract and Other Contracts
2. Airplane Personal Injury
3. Assault, Defamation
4. Marine Personal Injury
5. Motor Vehicle Personal Injury
6. Other Personal Injury (Please specify)
7. Products Liability
8. Products Liability - Asbestos
9. All other Diversity Cases (Please specify)

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Della Sentilles, counsel of record do hereby certify:

- Relief other than monetary damages is sought.

DATE: February 18, 2015

Handwritten signature of Della Sentilles, Attorney-at-Law

24083827 (TX) Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: February 18, 2015

Handwritten signature of Della Sentilles, Attorney-at-Law

24083827 (TX) Attorney I.D.#

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA



CASE MANAGEMENT TRACK DESIGNATION FORM

UNITED STATES OF AMERICA,

Plaintiff,

v.

A LIMITED PARTNERSHIP INTEREST HELD IN THE NAME OF OR FOR THE BENEFIT OF SANG AH PARK IN THE PHILADELPHIA U.S. IMMIGRATION FUND,

Defendant.

15

814

CIVIL ACTION NO:

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
(b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
(c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
(d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
(e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.)
(f) Standard Management – Cases that do not fall into any one of the other tracks. ()

(Handwritten signature/initials)

02/18/2014 Date

(Handwritten signature) Attorney-at-law

United States of America Attorney for

202-514-1263 Telephone

202-514-9155 FAX Number

della.sentilles@usdoj.gov E-Mail Address