ORIGINAL

FILED IN OPEN COURT
U.S.D.C. Atlanta

JUL 14 2020

James N. Hatten, Clerk
By: Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

*v.*

YUN JAE MOON

Criminal Indictment

No. 1 20-CR-258

**UNDER SEAL**

THE GRAND JURY CHARGES THAT:

**Count One**
*False Statements in Application for United States Passport*
**(18 U.S.C. § 1542)**

On or about August 9, 2010, in the Northern District of Georgia, the defendant, YUN JAE MOON, willfully and knowingly made a false statement in an Application for a United States Passport, Form DS-11, with intent to induce and secure the issuance of a passport under the authority of the United States, for his own use, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, in that the defendant stated in said application that he was a United States citizen and his place of birth was Cairo, Georgia, when, as he then well knew, these statements were false, in violation of Title 18, United States Code, Section 1542.

**Forfeiture**

Upon conviction of the offense alleged in Count One of this Indictment, the defendant, YUN JAE MOON, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(6):

(a) any conveyance, including any vessel, vehicle, or aircraft, used in the commission of the offense; and

(b) any property, real or personal, that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense, and any property that was used to facilitate, or was intended to be used to facilitate, the commission of the offense, including but not limited to the following:

(1) MONEY JUDGMENT: A sum of money in United States currency representing the amount of proceeds obtained as a result of each offense, or conspiracy to commit such offense, for which the defendant is convicted.

If any of the above described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL

FOREPERSON

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