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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

HONG JIN YOON (02)  
a.k.a. "Jay Yoon"

NO. 3:24-CR-00377-S

Supersedes Information filed September 10,  
2024, adding Defendant Hong Jin Yoon

**SUPERSEDING INFORMATION**

The United States Attorney charges:

At all times material to this Information:

Introduction

1. **Hong Jin Yoon**, also known as "**Jay Yoon**" was a resident of Denver, Colorado.
2. Individual A was a resident of Aurora, Colorado.
3. USPS Employee A was a resident of Aurora, Colorado and Centennial, Colorado. At all relevant times, USPS Employee A was a Senior Network Operations Analyst for United States Postal Service (USPS). USPS Employee A is related to Individual A.
4. USPS Employee B was a resident of Aurora, Colorado. At all relevant times, USPS Employee B was a Network Specialist for USPS.

5. JY Logistics LLC (“JY Logistics”) was a company based in Denver, Colorado providing shipping and trucking services. **Hong Yoon** started JY Logistics in approximately August 2020.

Count One

Conspiracy to Commit Honest Services Wire Fraud  
(Violation of 18 U.S.C. § 371 (18 U.S.C. §§ 1343 and 1346))

6. Beginning in or about June 2020 and continuing through in or about April 2021, in the Dallas Division of the Northern District of Texas and elsewhere, Defendant **Hong Jin Yoon, a.k.a. “Jay Yoon,”** along with USPS Employee A, USPS Employee B, and Individual A, and other individuals known and unknown to the United States Attorney, did unlawfully, voluntarily, intentionally, and knowingly conspire, combine, confederate, and agree together and with each other to pay bribes to USPS Employee A and USPS Employee B intending USPS Employee A and USPS Employee B to be influenced and rewarded in connection with the awarding of USPS service contracts, in violation of 18 U.S.C. §§ 1343 and 1346, all in violation of 18 U.S.C. § 371.

**Object of the Conspiracy**

7. It was the purpose and object of the conspiracy for USPS Employee A and USPS Employee B to solicit and receive bribes from **Hong Yoon** in exchange for USPS Employee A and USPS Employee B influencing the USPS to award service contracts to a shipping company owned and operated by **Hong Yoon**.

8. It was further the purpose and object of the conspiracy to conceal the kickback payments from **Hong Yoon** to USPS Employee A by directing those payments through a company owned by Individual A.

**Manner and Means of the Conspiracy**

9. The defendants sought to accomplish the objects of the conspiracy through the following manner and means, among others:

10. In approximately June 2020, **Hong Yoon** conspired with USPS Employee A and USPS Employee B to have the USPS officials help JY Logistics obtain a USPS contract in exchange for USPS Employee A and USPS Employee B receiving proceeds of the contract.

11. In approximately November 2020, USPS awarded contract 800AC to JY Logistics to provide shipping services during peak emergency season from December 1, 2020 through December 31, 2020.

12. From approximately January 2021 through March 2021, USPS paid JY Logistics approximately \$1,632,549.94 for services provided under contract 800AC. These payments were transmitted via interstate wire transfer from USPS's St. Louis, Missouri bank account to J.Y. Logistics' Wells Fargo Denver, Colorado account ending in 8887.

13. On approximately March 1, 2021, **Hong Yoon**, at the direction of USPS Employee B, paid an associate of USPS Employee B approximately \$295,275 for the benefit of USPS Employee B.

14. On approximately April 7, 2021, **Hong Yoon**, at the direction of USPS Employee A, paid Individual A approximately \$295,275, for the benefit of USPS Employee A.

**Overt Acts**

15. In furtherance of the conspiracy and to effect the objects thereof, the defendants and their coconspirators committed or caused to be committed the following overt acts:

16. On or about April 7, 2021, **Hong Yoon** knowingly transmitted or caused to be transmitted by means of wire and radio communication in interstate commerce, certain writings, signs, signals, pictures and sounds, to wit a transfer via check from in the amount of \$295,275.00 from J.Y. Logistics' Wells Fargo Denver, Colorado account ending in 8887 to Individual A's JP Morgan Chase Aurora, Colorado account ending in 9091 via interstate financial institution servers.

All in violation of 18 U.S.C. § 371.

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