

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
JAMES SEPULVEDA, a/k/a "Cat Man Jim"	:	VIOLATIONS:
	:	18 U.S.C. § 371 (conspiracy to commit interstate transportation of stolen property - 1 count)
	:	18 U.S.C. § 2314 (interstate transportation of stolen property - 4 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. From at least on or about January 20, 2011 and continuing through at least on or about June 22, 2011, in the Eastern District of Pennsylvania and elsewhere, defendant

**JAMES SEPULVEDA,
a/k/a "Cat Man Jim,"**

conspired and agreed, with others known and unknown to the United States Attorney, to commit an offense against the United States, that is, to unlawfully transport in interstate commerce goods and merchandise worth more than \$5,000 which he knew were stolen, in violation of Title 18, United States Code, Section 2314.

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant JAMES SEPULVEDA, working with others known and

unknown to the United States Attorney, stole catalytic converters from more than 100 cars in Pennsylvania, New Jersey, Delaware and Maryland, causing losses of more than \$100,000.

3. Defendant JAMES SEPULVEDA, working with others known and unknown to the United States Attorney, went to industrial parking lots in Pennsylvania, New Jersey, Delaware and Maryland at night, cut catalytic converters from the target vehicles, took the stolen catalytic converters to Delaware, and then transported the stolen catalytic converters into Pennsylvania for sale. SEPULVEDA and others also stole catalytic converters from parking lots at train stations and “park and ride” lots in Pennsylvania, New Jersey, Delaware and Maryland during daytime hours, and transported the stolen catalytic converters directly to Pennsylvania for sale.

4. Defendant JAMES SEPULVEDA and others used a variety of cars to drive to the areas where the target vehicles were parked, and used a reciprocating saw to cut the catalytic converters from the parked vehicles. Defendant SEPULVEDA generally cut the converters from the exhaust systems while another co-conspirator acted as a lookout.

5. Defendant JAMES SEPULVEDA and others sold all the stolen catalytic converters at a scrap yard located in Philadelphia, Pennsylvania in exchange for cash.

6. Defendant JAMES SEPULVEDA and others used the proceeds from the stolen catalytic converters to buy heroin and other items.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, defendant JAMES SEPULVEDA and others known and unknown to the United States Attorney, committed the following overt acts, among others, in the Eastern District of Pennsylvania and

elsewhere:

1. On diverse dates between January 4, 2011 and June 22, 2011, defendant JAMES SEPULVEDA and others stole catalytic converters from vehicles in Pennsylvania, New Jersey, Delaware and Maryland, and sold the stolen catalytic converters at a scrap yard located in Philadelphia, Pennsylvania.

2. On or about the following dates, defendant JAMES SEPULVEDA and others worked together to steal catalytic converters from vehicles parked at the following locations, knowing the same to have been stolen, converted, or taken by fraud:

#	Date	Location	Stolen Property
a.	Between February 18-February 24, 2011	Crocodile Café 950 W. Valley Road Tredyffrin Township Chester County Pennsylvania	Catalytic converters valued at approximately \$5,217.17
b.	Between February 17-February 24, 2011	Snyders of Hanover 909 Camaro Run W. Goshen Township Chester County Pennsylvania	Catalytic converters valued at approximately \$5,248.41
c.	Between April 6-April 7, 2011	Snyders of Hanover 909 Camaro Run W. Goshen Township Chester County Pennsylvania	Catalytic converters valued at approximately \$6,502.33.
d.	Between April 8 - April 11, 2011	New Line Communications 823 Lincoln Avenue W. Goshen Township Chester County Pennsylvania	Catalytic converters valued at approximately \$6,540.79

3. After committing each of the thefts listed above, defendant JAMES SEPULVEDA and others took the stolen items from Pennsylvania to Delaware, and the

following day transported the stolen property to the scrap yard in Philadelphia, Pennsylvania, where, knowing the same to have been stolen, converted, and taken by fraud, defendant SEPULVEDA received cash for the stolen property.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH FIVE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about the following dates, each set of dates constituting a separate count, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JAMES SEPULVEDA,
a/k/a “Cat Man Jim,”**

unlawfully transported in interstate commerce from Pennsylvania to Delaware, and then back to Philadelphia, Pennsylvania, goods and merchandise with a value of \$5,000 or more, that is, catalytic converters, and aided and abetted the transportation of such goods and merchandise, knowing the same to have been stolen, converted, and taken by fraud:

Count	Date	Location	Stolen Property
2	Between February 18-February 24, 2011	from Tredyffrin Township, Chester County, PA, to Delaware to Philadelphia, PA	Catalytic converters valued at approximately \$5,217.17
3.	Between February 17-February 24, 2011	from W. Goshen Township Chester County, PA, to Delaware to Philadelphia, PA	Catalytic converters valued at approximately \$5,248.41
4	Between April 6-April 7, 2011	from W. Goshen Township Chester County, PA, to Delaware to Philadelphia, PA	Catalytic converters valued at approximately \$6,502.33.
5	Between April 8 - April 11, 2011	from W. Goshen Township Chester County, PA, to Delaware to Philadelphia, PA	Catalytic converters valued at approximately \$6,540.79

All in violation of Title 18, United States Code, Sections 2314 and 2.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 371, and 2314, set forth in this information, defendant

**JAMES SEPULVEDA,
a/k/a “Cat Man Jim,”**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses.

2. If any of the property subject to forfeiture, 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 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,
United States Code, Section 981(a)(1)(C).

ZANE DAVID MEMEGER
UNITED STATES ATTORNEY