

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No.
	:	
LUIS RODRIGUEZ	:	18 U.S.C. § 1349
	:	

I N F O R M A T I O N

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

a. Public Services Electric and Gas ("PSE&G"), a subsidiary of Public Service Enterprise Group, supplied electric services to its customers, and monitored the electric services through meters located at its customers' residences or places of business (the "PSE&G Meters"). PSE&G mailed statements and bills to its customers using the United States Postal Service.

b. PSE&G Meters were configured to monitor the total usage of electric service by PSE&G customers. PSE&G Meters were sealed with special locking mechanisms and servicing them required custom tools (the "PSE&G Tools"). A tamperproof tag was clipped to each PSE&G Meter to assist efforts by PSE&G to detect tampered meters (the "Anti-Tampering Tag"). The Anti-Tampering Tag did not prevent tampering, but rather provided evidence that someone had tampered with the PSE&G Meters. Only authorized

electricians were permitted to service or in any way alter or adjust PSE&G Meters.

### **The Conspiracy**

2. From in or about February 1998 to in or about February 2006, in the District of New Jersey and elsewhere, defendant

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did knowingly and intentionally conspire with others to devise a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations and promises, which scheme and artifice was in substance and in part as set forth below, and for the purpose of executing such scheme and artifice or attempting to do so, caused to be placed in post offices and authorized depositories for mail matter, matters and things to be sent and delivered by the United States Postal Service, contrary to 18 U.S.C. § 1341.

### **The Object of the Conspiracy**

3. The object of the conspiracy was to fraudulently reduce the electric usage monitored by PSE&G Meters located at the residence and business locations of certain PSE&G customers and thereby reduce the amount PSE&G billed those customers.

**Manner and Means of the Conspiracy**

4. As part of the conspiracy, defendant RODRIGUEZ, would obtain the PSE&G Tools required to open the PSE&G Meters.

5. As further part of the conspiracy, defendant RODRIGUEZ would agree with certain PSE&G customers to use his PSE&G Tools to open the PSE&G boxes at their residences or business locations.

6. As further part of the conspiracy, defendant RODRIGUEZ received cash from certain customers in return for his tampering with their PSE&G Meters.

7. As further part of the conspiracy, defendant RODRIGUEZ would use his PSE&G Tools to tamper with the PSE&G Meters of the customers and subsequently re-attach the Anti-Tampering Tag to the meter in an attempt to make it appear that he had not tampered with the PSE&G Meters.

8. As further part of the conspiracy, the tampered PSE&G Meters would register less electrical use than was actually used, causing PSE&G to subsequently mail erroneous statements and bills to the customers charging significantly less for the electrical use than was owed PSE&G.

9. As further part of the conspiracy, PSE&G under-billed the customers more than \$2 million.

In violation of Title 18, United States Code, Section 1349.

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CHRISTOPHER J. CHRISTIE  
United States Attorney