

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No. 11-
TAJ ELLIOT : 18 U.S.C. § 371,
18 U.S.C. § 2119(1),
: 18 U.S.C. § 924(c)(1)(A),
18 U.S.C. § 2

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:

Count One
(Conspiracy to Commit Carjacking)

At all times relevant to this Information:

1. A.G. was an authorized user of a 2004 burgundy, four-door Nissan Maxima (hereinafter "the Maxima"), which was manufactured outside the state of New Jersey and bore a vehicle identification number ending in 4196.

2. From in and around November 2010 to in and around February 2011, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

TAJ ELLIOT,

and co-conspirators not named herein ("the co-conspirators") did knowingly and intentionally conspire and agree with each other and others to commit an offense against the United States, namely, to take from the person and presence of another, by

force, violence and intimidation, with intent to cause death and serious bodily harm, motor vehicles that had been transported, shipped and received in interstate commerce, contrary to Title 18, United States Code, Section 2119(1).

Objects of the Conspiracy

3. It was an object of the conspiracy for defendant TAJ ELLIOT and the co-conspirators to profit from taking vehicles by force, violence and intimidation and re-selling them and/or using them to carjack other vehicles.

4. It was a further object of the conspiracy for defendant TAJ ELLIOT and the co-conspirators to benefit from unlawfully taking personal items from carjacked vehicles.

Manner and Means of the Conspiracy

5. It was part of the conspiracy that defendant TAJ ELLIOT and others planned to carjack multiple cars at gunpoint.

6. It was further part of the conspiracy that defendant TAJ ELLIOT and others carried and brandished firearms while carjacking vehicles.

Overt Acts

7. In furtherance of the conspiracy, and to achieve the objects thereof, on or about January 10, 2011, defendant TAJ ELLIOT and others committed and caused to be committed the following overt acts, among others, in the District of New Jersey:

a. Defendant TAJ ELLIOT and others approached A.G., who was standing near the Maxima in and around the vicinity of Park Avenue, in Newark, New Jersey, and at gunpoint, ordered A.G. to surrender the keys to the Maxima and other personal items.

b. After A.G. surrendered the keys to the Maxima and other personal items, defendant TAJ ELLIOT and the co-conspirators took the Maxima and sped away.

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

Count Two
(Carjacking)

1. Paragraphs 1 and 3 through 7 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about January 10, 2011, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

TAJ ELLIOT,

and co-conspirators not named herein did knowingly and with the intent to cause death and serious bodily harm, take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce, namely, a 2004 burgundy, four-door Nissan Maxima, with a vehicle identification number ending in 4196, from the person and presence of another, namely, A.G., by force and violence and by intimidation.

In violation of Title 18, United States Code, Section 2119(1) and Section 2.

Count Three

(Use of a Firearm in Furtherance of a Crime of Violence)

1. Paragraphs 1 and 3 through 7 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about January 10, 2011, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

TAJ ELLIOT,

and co-conspirators not named herein, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, specifically the carjacking set forth in Count Two of this Information, did knowingly use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i) and (ii) and Section 2.



PAUL J. FISHMAN
United States Attorney

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v.

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INFORMATION FOR

18 U.S.C. § 371; 18 U.S.C. §§ 2119(1) and 2; 18 U.S.C. § 924(c)(1)(A) and 18 U.S.C. § 2

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