

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

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. <u>11-715</u></b>
	:	
<b>v.</b>	:	<b>DATE FILED: <u>12/8/11</u></b>
	:	
<b>KELLY ANN LOCK</b>	:	<b>VIOLATIONS:</b>
<b>BRYAN NEIDE,</b>	:	<b>18 U.S.C. § 371 (conspiracy to</b>
<b>a/k/a “Delaware,”</b>	:	<b>commit interstate transportation of</b>
<b>a/k/a “Delaware Guys”</b>	:	<b>stolen property - 1 count)</b>
	:	<b>18 U.S.C. § 2314 (interstate</b>
	:	<b>transportation of stolen property -</b>
	:	<b>5 counts)</b>
	:	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	:	<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From at least on or about January 4, 2011 and continuing through at least on or about August 5, 2011, in the Eastern District of Pennsylvania and elsewhere, defendants

**KELLY ANN LOCK and  
BRYAN NEIDE,  
a/k/a “Delaware”  
a/k/a “Delaware Guys”**

conspired and agreed, together and with others known and unknown to the grand jury, including defendant James Sepulveda, a/k/a “Cat Man Jim,” charged elsewhere, 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 they knew were stolen, in violation of Title 18, United States Code, Section 2314.

## **MANNER AND MEANS**

It was part of the conspiracy that:

2. Defendants KELLY ANN LOCK, BRYAN NEIDE, James Sepulveda and others, known and unknown to the grand jury, stole catalytic converters from more than 100 cars in Pennsylvania, New Jersey, Delaware and Maryland, causing losses of more than \$100,000.

3. Defendants KELLY ANN LOCK, BRYAN NEIDE, James Sepulveda and others, known and unknown to the grand jury, stole catalytic converters from industrial parking lots in Pennsylvania, New Jersey, Delaware and Maryland at night, took the stolen catalytic converters to Delaware, and then transported the stolen catalytic converters into Pennsylvania for sale. Defendants KELLY ANN LOCK, BRYAN NEIDE, James Sepulveda and others, known and unknown to the grand jury, 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. Defendants KELLY ANN LOCK, BRYAN NEIDE, James Sepulveda and others, known and unknown to the grand jury, used a variety of vehicles to drive to the areas where vehicles were parked, and used a reciprocating saw to cut the catalytic converters from the parked vehicles.

5. Defendants KELLY ANN LOCK, BRYAN NEIDE, James Sepulveda and others, known and unknown to the grand jury, sold all the stolen catalytic converters at IntraGalactic Metal Recyclers, LLC, a scrap yard located at 2204 E. Somerset Street in Philadelphia, Pennsylvania in exchange for U.S. currency.

6. Defendants KELLY ANN LOCK, BRYAN NEIDE, James Sepulveda and others, known and unknown to the grand jury, 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, defendants KELLY ANN LOCK, BRYAN NEIDE, and James Sepulveda committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about the following dates, defendants KELLY ANN LOCK, BRYAN NEIDE, and James Sepulveda, as more fully set forth below, stole 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	Defendants who committed thefts
a.	Between January 14-January 17, 2011	Pittsburg Glass Works 130 Hicks Road Claymont, Delaware	Catalytic converters valued at approximately \$3,536.16	KELLY ANN LOCK BRYAN NEIDE James Sepulveda
b.	Between January 3-January 24, 2011	Party Tyme Rental 210 Carter Drive West Goshen Township Chester County, PA	Catalytic converters valued at approximately \$1,509.33	BRYAN NEIDE James Sepulveda
c.	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	KELLY ANN LOCK James Sepulveda
d.	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	KELLY ANN LOCK James Sepulveda

e.	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.	KELLY ANN LOCK James Sepulveda
f.	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	KELLY ANN LOCK BRYAN NEIDE James Sepulveda
g.	June 17, 2011	Delva Tool 1603 Industrial Hwy Cinnaminson Township Burlington County, NJ	Catalytic converters valued at approximately \$6,631.67	KELLY ANN LOCK James Sepulveda

2. After committing the thefts listed in Overt Act 1 a, b, c, d, e, and f, above, the stolen items were taken to Delaware, and transported to Philadelphia the following day, where they were sold.

3. After committing each the thefts listed in Overt Act 1 g, above, the stolen items were transported to Philadelphia, where they were sold.

4. On or about the following dates, the defendants sold catalytic converters to IntraGalactic Metal Recyclers, LLC as more fully set forth in the chart below:

	DATE	Defendant(s)
a.	January 9, 2011	BRYAN NEIDE
b.	January 14, 2011	BRYAN NEIDE
c.	January 16, 2011	BRYAN NEIDE
d.	January 23, 2011	BRYAN NEIDE
e.	January 29, 2011	BRYAN NEIDE

f.	July 22, 2011	KELLY ANN LOCK and BRYAN NEIDE
g.	July 24, 2011	BRYAN NEIDE
h.	July 25, 2011	BRYAN NEIDE
i.	July 26, 2011	KELLY ANN LOCK and BRYAN NEIDE
j.	July 31, 2011	BRYAN NEIDE
k.	August 1, 2011	KELLY ANN LOCK
l.	August 2, 2011	KELLY ANN LOCK and BRYAN NEIDE
m.	August 4, 2011	BRYAN NEIDE
n.	August 5, 2011	BRYAN NEIDE

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

**COUNTS TWO THROUGH FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the following dates, in the Eastern District of Pennsylvania, and elsewhere, defendant

**KELLY ANN LOCK**

unlawfully transported in interstate commerce from Pennsylvania to Delaware, and then back to Philadelphia, Pennsylvania, or from New Jersey to Philadelphia, 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, or taken by fraud:

Count	Date	Location	Stolen Property
2	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
3	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
4	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.
5	June 17, 2011	Delva Tool 1603 Industrial Hwy Cinnaminson Township Burlington County, NJ	Catalytic converters valued at approximately \$6,631.67

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

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the following dates, in the Eastern District of Pennsylvania, and elsewhere, defendants

**KELLY ANN LOCK and  
BRYAN NEIDE,  
a/k/a “Delaware”  
a/k/a “Delaware Guys”**

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, or taken by fraud:

Date	Location	Stolen Property
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

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



**NOTICE OF FORFEITURE**

**THE GRAND JURY 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, defendants

**KELLY ANN LOCK and  
BRYAN NEIDE,  
a/k/a “Delaware”  
a/k/a “Delaware Guys”**

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).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY**