

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Criminal No. 23-
 :
 v. : 18 U.S.C. § 371
 :
 KEVIN JACKSON :
 :

INFORMATION

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

From on or about December 2, 2016 through on or about March 20, 2019, in the District of New Jersey and elsewhere, the defendant,

KEVIN JACKSON,

did knowingly and intentionally conspire and agree with and others to transport in interstate and foreign commerce goods, wares, merchandise, securities and money, the value of which was at least \$5,000, knowing the same to have been stolen, contrary to Title 18, United States Code, Section 2314.

GOAL OF THE CONSPIRACY

The goal of the conspiracy was to burglarize the residences of certain Asian small business owners residing in New Jersey, New York, Pennsylvania, and Delaware, steal large sums of money, valuable jewelry, and other items, and then transport the stolen goods in interstate commerce, including to the District of New Jersey and to the Eastern District of Pennsylvania, in order to sell them.

OVERT ACTS

In furtherance of the conspiracy and to achieve its unlawful object, the following overt acts, among others, were committed in the District of New Jersey and elsewhere:

1. From on or about December 2, 2016 through on or about March 20, 2019, JACKSON and his co-conspirators identified individuals of Asian descent, by performing reconnaissance on residences in heavily populated Asian and Asian-American communities and conducting surveillance of individuals of Asian descent at their respective businesses, typically Asian restaurants.

2. From on or about December 2, 2016 through on or about March 20, 2019, after learning the victims' patterns, JACKSON and his co-conspirators burglarized their residences at times when the victims were unlikely to be present, including as detailed below.

a. On or about December 15, 2018, JACKSON and his co-conspirators burglarized the home of Victim-1 in Middlesex County, New Jersey ("Home-1"), stealing approximately \$57,790 in property.

b. On or about December 22, 2018, JACKSON and his co-conspirators burglarized the home of Victim-2 in Union County, New Jersey ("Home-2"), stealing approximately \$12,950 in property.

- c. On or about January 3, 2019, JACKSON and his co-conspirators burglarized the home of Victim-3 in Middlesex County, New Jersey (“Home-3”), stealing approximately \$2,000 in property.
- d. On or about January 4, 2019, JACKSON and his co-conspirators burglarized the home of Victim-4 in Somerset County, New Jersey (“Home-4”), stealing approximately \$320 in property.
- e. On or about January 19, 2019, JACKSON and his co-conspirators burglarized the home of Victim-5 in Camden County, New Jersey (“Home-5”), stealing approximately \$58,150 in property.
- f. On or about January 26, 2019, JACKSON and his co-conspirators burglarized the home of Victim-6 in Camden County, New Jersey (“Home-6”), stealing approximately \$24,000 in property.
- g. On or about February 9, 2019, JACKSON and his co-conspirators burglarized the home of Victim-7 in Middlesex County, New Jersey (“Home-7”), stealing approximately \$1,350 in property.
- h. On or about February 28, 2019, JACKSON and his co-conspirators burglarized the home of Victim-8 in Union County, New Jersey (“Home-8”), stealing approximately \$130,000 in property.

- i. On or about March 2, 2019, JACKSON and his co-conspirators burglarized the home of Victim-9 in Union County, New Jersey (“Home-9”), stealing approximately \$5,610 in property.
- j. On or about March 5, 2019, JACKSON and his co-conspirators burglarized the home of Victim-9 in Middlesex County, New Jersey (“Home-9”), stealing approximately \$2,416 in property.

3. From on or about December 2, 2016 through on or about March 20, 2019, following each of the aforementioned completed burglaries, JACKSON and his co-conspirators transported certain items of the property stolen from the residences referenced in this Information in interstate commerce, including from the District of New Jersey to the Eastern District of Pennsylvania.

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


FORFEITURE ALLEGATION

1. The United States hereby gives notice to the defendant that, upon conviction of the offense alleged in this Information, the United States will seek forfeiture, in accordance with 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense and all property traceable to such property.

2. If by any act or omission of the defendant any of the property subject to forfeiture described above:

- 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 21 U.S.C. § 853(p), as incorporated to 28 U.S.C. § 2461(c), to seek forfeiture of any other property of such defendant up to the value of the above-described forfeitable property.


PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: 23-_____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

KEVIN JACKSON

INFORMATION FOR

18 U.S.C. § 371

PHILIP R. SELLINGER

*UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY*

DONG JOO LEE
*ASSISTANT U.S. ATTORNEY
NEWARK, NJ
973-297-4388*
