

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 15-
 :
 ELIEZER MEDINA : 18 U.S.C. § 371
 :

INFORMATION

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

1. From in or about November 2013 through in or about August 2014, in Bergen County, in the District of New Jersey, and elsewhere, defendant

ELIEZER MEDINA

did knowingly and intentionally conspire and agree with Jose Medina and others to commit an offense against the United States, namely, to transport, transmit, and transfer in interstate commerce goods, wares, merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen and converted, contrary to Title 18, United States Code, Section 2314.

OBJECT OF THE CONSPIRACY

2. The object of the conspiracy was for defendant ELIEZER MEDINA, co-conspirator Jose Medina, and other co-conspirators to steal money by burglarizing stores in New Jersey, New York, Pennsylvania, and elsewhere, and thereafter to transport the stolen money across state lines, to Pennsylvania, and elsewhere.

MANNER AND MEANS OF THE CONSPIRACY

3. It was a part of the conspiracy that defendant ELIEZER MEDINA, co-conspirator Jose Medina, and other co-conspirators would first target commercial stores in New Jersey, New York, Pennsylvania, and elsewhere, to burglarize.

4. It was a further part of the conspiracy that defendant ELIEZER MEDINA and other co-conspirators often would enter the target store during business hours to identify, among other things, the emergency exit door, the store's alarm system, and any interior or exterior surveillance cameras.

5. It was a further part of the conspiracy that, once the commercial stores had been targeted, defendant ELIEZER MEDINA, co-conspirator Jose Medina, and other co-conspirators would drive together to the store, usually late at night or during hours when the store was closed.

6. It was a further part of the conspiracy that defendant ELIEZER MEDINA, co-conspirator Jose Medina, and other co-conspirators, typically wearing ski masks and gloves, would then forcibly break through a door and enter the target store by using electric saws, pry-bars, and other burglar tools.

7. It was a further part of the conspiracy that defendant ELIEZER MEDINA, co-conspirator Jose Medina, and other co-conspirators, once inside the target store, would then locate the store's safe, use electric saws and other burglar tools to break into the safe, and steal the cash from the safe.

8. It was a further part of the conspiracy that defendant ELIEZER MEDINA, co-conspirator Jose Medina, and other co-conspirators would take

the cash stolen from the stores they burglarized and transport it across state lines to New York, Pennsylvania, and elsewhere, after the burglaries were completed.

OVERT ACTS

9. In furtherance of the conspiracy and to effect its unlawful object, defendant ELIEZER MEDINA and his co-conspirators committed and caused to be committed in the District of New Jersey and elsewhere the following overt acts, among others:

- a. On or about November 3, 2013, defendant ELIEZER MEDINA and others burglarized a store in Paramus, New Jersey, stealing approximately \$40,000 in cash.
- b. Following the burglary, defendant ELIEZER MEDINA and others transported the stolen cash from the burglary location in New Jersey to Pennsylvania and New York.
- c. On or about November 24, 2013, defendant ELIEZER MEDINA and others burglarized a store in Paramus, New Jersey, stealing approximately \$50,000 in cash.
- d. Following the burglary, defendant ELIEZER MEDINA and others transported the stolen cash from the burglary location in New Jersey to Pennsylvania and New York.
- e. On or about August 24, 2014, defendant ELIEZER MEDINA, co-conspirator Jose Medina, and others burglarized a store in