

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal No. 11-
JEROME CONOVER : 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. S.Q. was the owner of a 1997 black, four-door Lincoln Continental (hereinafter "the Lincoln"), which was manufactured outside the state of New Jersey and bore a vehicle identification number ending in 5315.
2. J.M. was the owner of a 2004 burgundy, four-door Dodge Durango (hereinafter "the Durango"), which was manufactured outside the state of New Jersey and bore a vehicle identification number ending in 4892.

3. On or about January 12, 2011, in Essex County, in the District of New Jersey, and elsewhere, the defendant,
JEROME CONOVER,
and co-conspirators not named herein 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

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

5. It was a further object of the conspiracy for defendant JEROME CONOVER and other co-conspirators to benefit from unlawfully taking personal items from the passengers of carjacked vehicles.

Manner and Means of the Conspiracy

6. It was part of the conspiracy that defendant JEROME CONOVER and others planned to carjack multiple cars at gunpoint.

7. It was further part of the conspiracy that defendant JEROME CONOVER and others carried and brandished firearms while carjacking vehicles.

Overt Acts

8. In furtherance of the conspiracy, and to achieve the objects thereof, on or about January 12, 2011, defendant JEROME CONOVER and others committed and caused to be committed the following overt acts, among others, in the District of New Jersey:

a. Defendant JEROME CONOVER and others were driving in the Lincoln, which had been carjacked at gunpoint from S.Q. in and around the vicinity of Meeker Avenue in Newark, New Jersey, and began tailgating the Durango, forcing the Durango to pull over to the side of the road, in and around South 19th Street, Newark, New Jersey.

b. Defendant JEROME CONOVER and others then positioned the Lincoln close to the Durango in order to box in the Durango.

c. Defendant JEROME CONOVER and others then exited the Lincoln and ordered J.M. out of the Durango at gunpoint.

d. After J.M. exited the Durango, defendant JEROME CONOVER and others drove away in the Durango and abandoned the Lincoln at the site of the Durango carjacking.

e. Defendant JEROME CONOVER and others then traveled in the Durango at a high rate of speed, crashing the Durango into multiple cars.

f. One of the co-conspirators tossed a firearm as he fled from the Durango.

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

Count Two
(Carjacking)

1. Paragraphs 1, 2, and 4 through 8 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about January 12, 2011, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

JEROME CONOVER,

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 Dodge Durango, with a vehicle identification number ending in 4892, from the person and presence of another, namely, J.M., 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, 2, and 4 through 8 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about January 12, 2011, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

JEROME CONOVER,

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

CASE NUMBER: 11-_____

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

UNITED STATES OF AMERICA

v.

JEROME CONOVER

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

PAUL J. FISHMAN

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