

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 13-
	:	
CONSTANTIN GINGA,	:	18 U.S.C. § 1349
a/k/a "Iordache Sava"	:	18 U.S.C. § 1028A
	:	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 Bank Fraud)

1. At all times relevant to this Information:
 - a. Defendant CONSTANTIN GINGA, a/k/a "Iordache Sava," ("GINGA") was a citizen of Romania and resided in Queens, New York.
 - b. M.C., a co-conspirator who is not named as a defendant herein, was a citizen of Romania and resided in Queens, New York.
 - c. Citibank was a federally insured financial institution as that term is defined by Title 18, United States Code, Section 20.

THE CONSPIRACY

2. From in or about November 2012 through on or about January 13, 2013, in Essex, Bergen, and Passaic Counties, in the District of New Jersey, and elsewhere, defendant

CONSTANTIN GINGA,
a/k/a "Iordache Sava,"

did knowingly and intentionally conspire and agree with others to devise a scheme and artifice to defraud a financial institution, namely Citibank, and to obtain money and property owned by, and under the custody and control of, Citibank, by means of materially false and fraudulent pretenses, representations and promises, contrary to Title 18, United States Code, Section 1344.

OBJECT OF THE CONSPIRACY

3. It was the object of the conspiracy for GINGA, M.C., and others to enrich themselves by installing devices on automated teller machines ("ATMs") that acquired users' account information, and, thereafter, by using this account information to create new ATM cards to withdraw funds from the compromised accounts.

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that the co-conspirators installed "skimming" devices onto the card reader interfaces of Citibank ATMs and Citibank ATM vestibule doors. These skimming devices captured and recorded the information contained in the magnetic strip of customers' ATM cards. In addition, the co-conspirators installed pinhole cameras, concealed within overlay

plates designed to blend in with Citibank's existing ATM components, onto Citibank ATMs. These pinhole cameras were capable of recording the keystrokes of Citibank customers as they entered their Personal Identification Numbers ("PINs") during ATM transactions.

5. It was a further part of the conspiracy that the co-conspirators then transferred the stolen customer data and PIN numbers onto blank debit/ATM cards, thereby creating counterfeit ATM cards ("Counterfeit ATM Cards").

6. It was a further part of the conspiracy that the co-conspirators, including GINGA and M.C., used the Counterfeit ATM Cards to make unauthorized ATM withdrawals from Citibank customer bank accounts.

SPECIFIC TRANSACTIONS

7. On or about December 17, 2012, GINGA and M.C. visited a Citibank location in Englewood, New Jersey, and used Counterfeit ATM Cards containing stolen customer account information to withdraw tens of thousands of dollars from Citibank customer accounts.

8. From in or about November 2012 through on or about January 13, 2013, GINGA, M.C., and others used Counterfeit ATM Cards to fraudulently obtain approximately \$985,000 from Citibank ATMs in New Jersey, New York, and Connecticut.

9. In each of these fraudulent ATM transactions, GINGA and his co-conspirators withdrew funds from accounts that their co-conspirators had previously skimmed at Citibank branches in New

Jersey, New York, and Connecticut, including an account of a New Jersey resident named "W.S."

10. Citibank ultimately reversed the unauthorized withdrawals from its customers' accounts, thereby assuming the loss of approximately \$985,000.

All in violation of Title 18, United States Code, Section 1349.

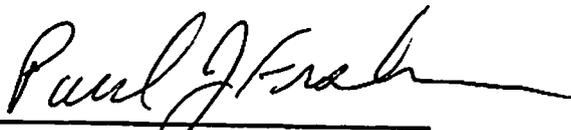
COUNT TWO
(Aggravated Identity Theft)

On or about December 30, 2012, in the District of New Jersey, and elsewhere, defendant

CONSTANTIN GINGA,
a/k/a "Iordache Sava,"

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, namely an ATM card containing the name and bank account number of an individual identified as "W.S.," during and in relation to a felony violation of a provision contained in chapter 63, United States Code, that is, conspiracy to commit bank fraud in violation of Title 18, United States Code, Section 1349, charged in Count One of this Information.

All in violation of Title 18, United States Code, Sections 1028A(a) (1) and 2.



PAUL J. FISHMAN
United States Attorney