

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 14-
 :
 MARIUS COTIGA : 18 U.S.C. § 1349

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:

1. At all times relevant to this Information:
 - a. Defendant MARIUS COTIGA ("COTIGA") was a citizen of Romania and resided in Queens, New York.
 - b. Constantin Ginga, 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

MARIUS COTIGA

did knowingly and intentionally conspire and agree with Constantin Ginga, and 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 COTIGA, Ginga, 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 bank ATMs and bank ATM vestibule doors. These "skimming" devices

captured and recorded information contained in the magnetic strip of customers' ATM cards.

5. It was further part of the conspiracy that the co-conspirators installed pinhole cameras, concealed within overlay plates designed to blend in with the banks' existing ATM components, onto bank ATMs. These pinhole cameras were capable of recording the keystrokes of bank customers as they entered their Personal Identification Numbers ("PINs") during ATM transactions.

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

7. It was further part of the conspiracy that the co-conspirators, including COTIGA and Ginga, used the Counterfeit ATM Cards to make unauthorized ATM withdrawals from customer bank accounts.

SPECIFIC TRANSACTIONS

8. On or about December 17, 2012, COTIGA and Ginga 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.

9. From in or about November 2012 through on or about January 13, 2013, COTIGA, Ginga, and others used Counterfeit ATM Cards to

fraudulently obtain approximately \$985,000 from Citibank ATMs in New Jersey, New York, and Connecticut.

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

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



PAUL J. FISHMAN
United States Attorney

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INFORMATION FOR

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