

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
: :
v. : Crim. No. 14-
: :
BOGDAN RADU : 18 U.S.C. § 1349
: 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 BOGDAN RADU ("RADU") was a citizen of Romania and resided in Queens, New York.
 - b. Ioan Leusca, a co-conspirator who is not named as a defendant herein, was a citizen of Romania and resided in Queens, New York.
 - c. Dezso Gyapias, a co-conspirator who is not named as a defendant herein, was a citizen of Romania and resided in Queens, New York.
 - d. M.V., a co-conspirator who is not named as a defendant herein, was a citizen of Romania and resided in Queens, New York.

e. Constantin Ginga, a co-conspirator who is not named as a defendant herein, was a citizen of Romania and resided in Queens, New York.

f. M.C., a co-conspirator who is not named as a defendant herein, was a citizen of Romania and resided in Queens, New York.

g. C.P., a co-conspirator who is not named as a defendant herein, was a citizen of Romania and resided in Queens, New York.

h. E.R., a co-conspirator who is not named as a defendant herein, was a citizen of Romania and resided in Queens, New York.

i. F.A., a co-conspirator who is not named as a defendant herein, was a citizen of Romania and resided in Queens, New York.

j. Wells Fargo, Citibank, and TD Bank were federally insured financial institutions as that term is defined by Title 18, United States Code, Section 20.

THE CONSPIRACY

2. From in or about April 2012 through on or about July 12, 2013, in Bergen, Essex, Union, Passaic, Morris, Monmouth, Middlesex, and Ocean Counties, in the District of New Jersey, and elsewhere, defendant

BOGDAN RADU

did knowingly and intentionally conspire and agree with Ioan Leusca, Dezso Gyapias, M.V., Constantin Ginga, M.C., C.P., E.R., F.A., and others to devise a scheme and artifice to defraud financial

institutions, namely Wells Fargo, Citibank, and TD Bank, and to obtain money and property owned by, and under the custody and control of, Wells Fargo, Citibank, and TD Bank, 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 RADU, Ioan Leusca, Dezso Gyapias, M.V., Constantin Ginga, M.C., C.P., E.R., F.A., 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 defendant RADU designed "skimming" devices for installation onto the card reader interfaces of bank ATMs and bank ATM vestibule doors. The "skimming" devices captured and recorded information contained in the magnetic strip of customers' ATM cards.

5. It was further part of the conspiracy that defendant RADU designed pinhole camera panels. The pinhole camera panels contained pinhole cameras that were concealed within overlay plates designed to blend in with the banks' existing ATM components. The 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 M.V. paid RADU for RADU's "skimming" devices and pinhole cameras. M.V. then recruited individuals, such as Ioan Leusca, Dezso Gyapias, M.V., Constantin Ginga, M.C., C.P., E.R., F.A., and others to participate in the scheme. M.V. and RADU taught these individuals how to install the "skimming" devices and pinhole cameras on bank ATMs.

7. It was further part of the conspiracy that the co-conspirators recruited by M.V. installed RADU's "skimming" devices onto the card reader interfaces of bank ATMs and bank ATM vestibule doors. In addition, the co-conspirators installed RADU's pinhole camera panels onto bank ATMs.

8. It was further part of the conspiracy that the RADU, M.V., and others then transferred the stolen customer account data and customer PIN numbers onto blank ATM cards, thereby creating counterfeit ATM cards ("Counterfeit ATM Cards").

9. It was a further part of the conspiracy that the co-conspirators used the Counterfeit ATM Cards to make unauthorized ATM withdrawals of millions of dollars from customer bank accounts.

10. Wells Fargo, Citibank, and TD Bank suffered total losses of approximately \$5 million.

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

COUNT TWO
(Aggravated Identity Theft)

On or about September 21, 2012, in the District of New Jersey,
and elsewhere, defendant

BOGDAN RADU

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 "Victim 1" 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, Section
1028A(a)(1) and Title 18, United States Code, Section 2.



PAUL J. FISHMAN
United States Attorney