

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

: Hon.

v.

: Criminal No.

LACHEZAR LAZAROV

: 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, LACHEZAR LAZAROV, having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

COUNT 1

Conspiracy to Commit Bank Fraud

1. At all times relevant to this Information, defendant LACHEZAR LAZAROV resided in Queens, New York.

2. At all times relevant to this Information, Valley National Bank (the "Victim Bank"), was a federally insured financial institution as that term is defined by 18 U.S.C. § 20.

The Scheme to Defraud

3. From on or about September 12, 2008, to in or about October 2008, defendant

LACHEZAR LAZAROV

did knowingly and intentionally conspire and agree with others to devise a scheme and artifice to defraud and to obtain money and property from the Victim 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

4. It was the object of the conspiracy for defendant LACHEZAR LAZAROV and others to enrich themselves by installing devices on ATM machines that acquired users' account information, and, thereafter, by using this account information to create new ATM cards to withdraw funds from these accounts.

Means and Methods of the Conspiracy

5. It was part of the conspiracy that identity information contained in the magnetic strip of an ATM card relating to the Victim Bank's customers and their accounts were read and recorded by an electronic device ("skimmer") inserted into the ATM, along with a pinhole camera that recorded the Victim Bank's customers' keystrokes when they entered their personal identification number ("PIN").

6. It was a further part of the conspiracy that the identity and PIN information were then transferred and loaded onto blank debit/ATM cards ("counterfeit ATM cards").

7. It was a further part of the conspiracy that the newly created counterfeit ATM cards, as described in the preceding paragraph, were then used to make unauthorized withdrawals from the skimmed accounts at the Victim Bank.

Specific Transactions

8. Between on or about September 12, 2008 and on or about

September 13, 2008, defendant **LACHEZAR LAZAROV**, along with two additional conspirators, Viktor Kafalov, who was formerly charged with this offense; and "C2," who is not charged in this Information, installed a number of electronic devices on ATMs at the Victim Bank's branches in Nutley and Belleville, New Jersey, which were capable of recording bank customer information encoded on credit and debit cards (the "Card Skimmers"). In addition, defendant **LACHEZAR LAZAROV**, along with Viktor Kafalov, installed cameras on the Victim Bank's ATMs that were capable of recording the keystrokes of Victim Bank customers as the customers entered Personal Identification Numbers ("PINs") during ATM transactions.

9. Between on or about September 13, 2008 and on or about September 28, 2008, defendant **LACHEZAR LAZAROV**, along with Viktor Kafalov and C2, used the card skimmers to obtain account information for approximately 348 accounts belonging to Victim Bank customers who used the ATMs in Nutley and Belleville, New Jersey during this period (the "Stolen Account Information").

10. At various times that the skimming devices were in place, and in order to avoid detection of these devices, defendant **LACHEZAR LAZAROV**, along with Viktor Kafalov and C2, intermittently removed the skimming devices and pinhole cameras.

11. Between on or about October 19, 2008 and on or about October 22, 2008, coconspirator Viktor Kafalov, along with "C3" and "C4," coconspirators who are not charged in this Information, used counterfeit ATM cards containing the Stolen Account

Information to fraudulently obtain \$278,144 from ATMs located in Brooklyn, Queens, Manhattan, and Long Island City, New York, and Mississauga, Ontario, Canada.

12. In each of these fraudulent ATM transactions, defendant **LACHEZAR LAZAROV**'s coconspirators withdrew funds from accounts that defendant **LACHEZAR LAZAROV** had previously skimmed at the Victim Bank's branches based in Nutley and Belleville, New Jersey, including an account in the name of "J.P."

13. The Victim Bank ultimately reversed the unauthorized withdrawals from its customers' accounts, thereby assuming the loss of approximately \$278,144.

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

COUNT 2

Aggravated Identity Theft

On or about September 19, 2008, in the District of New Jersey, and elsewhere, defendant

**LACHEZAR LAZAROV**

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 "J.P.," 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 Section 2.



**PAUL J. FISHMAN**  
United States Attorney

CASE NUMBER: \_\_\_\_\_

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**INFORMATION**

**18 U.S.C. § 1349, 18 U.S.C. § 1028A &  
18 U.S.C. § 2**

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**PAUL J. FISHMAN**

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