PJD/2010R01044

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
	:	Criminal No.
v.	:	
	:	18 U.S.C. § 373
	:	18 U.S.C. § 2
JAYEN I. PATEL, a/k/a "Jay Patel"	:	
	:	

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

1. Beginning in approximately September 2010, defendant Jayen I. Patel (hereinafter "defendant Patel") sought to engage others in a kidnapping plot to abduct a woman, with whom he was familiar, and the woman's minor child.

2. As part of the kidnapping plot, defendant Patel used instrumentalities of interstate and foreign commerce, including electronic-mail accounts and the Internet, to locate and communicate with an individual, whom he believed to be a white supremacist, to carry out the kidnapping plot (hereinafter "the individual").

3. During the kidnapping plot, defendant Patel would, at times, travel from his home in Pennsylvania to his place of employment in Monmouth Junction, New Jersey and to a commercial business center in Princeton, New Jersey, to facilitate communications with the individual.

4. Defendant Patel provided detailed instructions to the

individual regarding, among other things, conducting surveillance prior to executing the kidnapping, the manner and methods to be used during the approach of the victim, what to do if the victims were not compliant, and how to control both the mother victim and her minor child.

5. For example, on or about November 8, 2010, defendant Patel sent an electronic mail to the individual, stating that, after he had separated the mother and child, the kidnapper should tell the mother "look - it is NOT our intention to hurt your child but we know where you live, where she goes to school and even your relatives. AS long as you do what you're told with no questions, all will be fine." Defendant Patel later told the individual that if he brought a gun during the kidnapping, it would reinforce the "seriousness of the situation." Thereafter, on or about November 9, 2010, in an Internet instant message chat between defendant Patel and the individual, defendant Patel said that "[i]f there's trouble you put her down." Defendant Patel defined "put her down" as "knock[ing] her out if need be."

6. Defendant Patel instructed that the individual make threats against the adult victim's minor child and use physical force as methods of controlling the adult victim during the abduction.

7. Defendant Patel promised the individual that he would be paid once they were in control of the adult victim's bank

accounts.

8. Defendant Patel made repeated requests of the individual to carry out the kidnapping.

9. From in or about September 2010 through in or about November 2010, in Mercer and Middlesex Counties, in the District of New Jersey and elsewhere, defendant

Jayen I. Patel, a/k/a,
"Jay Patel"

did, with the intent that another person engage in conduct constituting a felony that has as an element the use, attempted use, or threatened use of physical force against property or against the person of another in violation of the laws of the United States, namely, kidnapping, contrary to 18 U.S.C. § 1201, and under circumstances strongly corroborative of that intent, knowingly and intentionally solicit, command, induce, and otherwise endeavor to persuade such other person to engage in such conduct.

In violation of Title 18, United States Code, Sections 373 and 2.

A TRUE BILL

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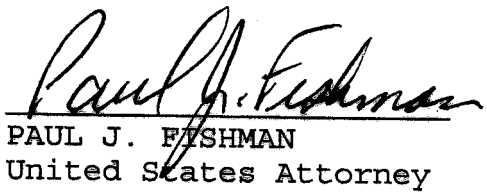
FOREPERSON



PAUL J. FISHMAN
United States Attorney