

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Criminal No. 20-
	:	
v.	:	18 U.S.C. §§ 659 and 2
	:	
JOEL CRUZ	:	<b><u>INFORMATION</u></b>

The defendant having waived in open court prosecution by Indictment, and having waived any defenses in open court based upon the statute of limitations, the United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

a. Defendant Joel Cruz (“CRUZ”) was a resident of New Jersey. CRUZ was employed by Company 1, and was assigned to work at a warehouse located in Dayton, New Jersey (“the Warehouse”).

b. The Treasury Executive Office for Asset Forfeiture (“TEOAF”) was a federal agency responsible for administering the Treasury Forfeiture Fund, and was the recipient of non-tax forfeitures made by, among other agencies, Customs and Border Protection (“CBP”). TEOAF stored property seized by CBP at the Warehouse.

c. Company 1 was a civilian company that contracted with TEOAF to, among other things, provide property management and disposition services at the Warehouse. These services included, the receipt, possession, custody, management, and disposition of seized, blocked, or forfeited property. At times, Company 1 contracted with third parties, including Company 2 to provide temporary contractors to work at the Warehouse.

d. On or about November 21, 2014, CBP seized approximately 14 boxes, containing approximately 628 iPhones, from Boston Logan International Airport. All 14 boxes were shipped from the United States, and were *en route* to Dubai, United Arab Emirates.

e. After their seizure, the 14 boxes were consolidated into 6 containers, each containing a unique shipping code (the "Seized Boxes") and were shipped and delivered to the Warehouse.

f. On or about January 2, 2015, a Company 1 employee accepted delivery of the Seized Boxes and logged the Seized Boxes into an internal tracking system known as DMS.

g. On or about January 9, 2015, CRUZ scanned the location of the Seized Boxes inside the Warehouse into the DMS system.

h. Between on or about January 9, 2015 and on or about February 2, 2015, CRUZ, aided and abetted at times by L.R., a Company 2 employee, stole approximately 292 iPhones with an approximate value of \$218,372 ("Stolen iPhones") from the Seized Boxes.

2. Between on or about January 9, 2015 and on or about February 2, 2015, in the County of Middlesex, in the District of New Jersey and elsewhere, defendant

**JOEL CRUZ**

did knowingly embezzle, steal, and unlawfully take, carry away, and conceal from the Warehouse, with intent to convert to his own use, the Stolen iPhones, which were valued at \$1,000 and more, and were moving in and were part of

and constituted an interstate and foreign shipment of freight, express, and other property.

In violation of Title 18, United States Code, Section 659 and Section 2.

*Craig Carpenito*  
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CRAIG CARPENITO  
United States Attorney

CASE NUMBER: 20-

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**INFORMATION FOR**

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**Craig Carpenito**  
*UNITED STATES ATTORNEY*  
*NEWARK, NEW JERSEY*

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LESLIE F. SCHWARTZ  
*ASSISTANT U.S. ATTORNEY*  
*(973) 645-3986*

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