

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

UNITED STATES OF AMERICA	:	Criminal No. 22-
	:	
v.	:	18 U.S.C. § 371
	:	
RANDI BARR	:	
	:	

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 Interstate Transportation of Stolen Property)

From on or about December 2, 2016 to on or about March 20, 2019, in the District of New Jersey and elsewhere, the defendant,

RANDI BARR,

did knowingly and intentionally conspire and agree with and others to transport in interstate and foreign commerce goods, wares, merchandise, securities and money, the value of which was at least \$5,000, knowing the same to have been stolen, contrary to Title 18, United States Code, Section 2314.

GOAL OF THE CONSPIRACY

The goal of the conspiracy was to burglarize the residences of certain Asian small business owners residing in New Jersey, New York, Pennsylvania, and Delaware of large sums of money, valuable jewelry, and other items, and then transport the stolen goods in interstate commerce, including to BARR's District of New Jersey residence and to the Eastern District of Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy and to effect its unlawful object, the following overt acts, among others, were committed in the District of New Jersey and elsewhere:

1. From on or about December 2, 2016 to on or about March 20, 2019, BARR and co-conspirators identified individuals of Asian descent, by performing reconnaissance on residences in heavily populated Asian and Asian-American communities and conducting surveillance of individuals of Asian descent at their respective businesses, typically Asian restaurants.

2. From on or about December 2, 2016 to on or about March 20, 2019, after learning the patterns of the victims, BARR and co-conspirators burglarized their residences at times when the victims were unlikely to be present, including as detailed below.

3. On or about September 1, 2018, BARR and co-conspirators burglarized the home of Victim-1 in Middlesex County, New Jersey ("Home-1"), stealing approximately \$1,000 in property.

4. On or about October 23, 2018, BARR and co-conspirators burglarized the home of Victim-2 in Middlesex County, New Jersey ("Home-2"), stealing approximately \$55,600 in property.

5. On or about November 20, 2018, BARR and co-conspirators burglarized the home of Victim-3 in Bergen County, New Jersey ("Home-3"), stealing approximately \$11,700 in property.

6. On or about December 1, 2018, BARR and co-conspirators burglarized the home of Victim-4 in Monmouth County, New Jersey ("Home-4"), stealing approximately \$20,200 in property.

7. On or about December 1, 2018, BARR and co-conspirators burglarized the home of Victim-5 in Monmouth County, New Jersey ("Home-5"), stealing approximately \$7,800 in property.

8. On or about December 1, 2018, BARR and co-conspirators burglarized the home of Victim-6 in Somerset County, New Jersey ("Home-6") stealing approximately \$320 in property.

9. On or about January 17, 2019, BARR and co-conspirators burglarized the home of Victim-7 in Camden County, New Jersey ("Home-7") stealing approximately \$6,295 in property.

10. On or about February 10, 2019, BARR and co-conspirators burglarized the home of Victim-8 in Monmouth County, New Jersey ("Home-8"), stealing approximately \$15,000 in property.

11. On or about February 14, 2019, BARR and co-conspirators burglarized home of Victim-9 in Middlesex County, New Jersey ("Home-9"), stealing approximately \$5,635 in property.

12. On or about March 4, 2019, BARR and co-conspirators burglarized the home of Victim-10 in Middlesex County, New Jersey ("Home-10"), stealing approximately \$150 in property.

13. On or about March 4, 2019, BARR and co-conspirators burglarized the home of Victim-11 in Bergen County, New Jersey ("Home-11"), stealing approximately \$1,300 in property.

14. On or about March 12, 2019, BARR and co-conspirators burglarized the home of Victim-12 in Bergen County, New Jersey ("Home-12"), stealing approximately \$110 in property.

15. On or about March 13, 2019, BARR and co-conspirators burglarized the home of Victim-13 in Bergen County, New Jersey ("Home-13"), stealing approximately \$2,500 in property.

16. On or about March 20, 2019, BARR and co-conspirators attempted to burglarize the home of Victim-11 in Monmouth County New Jersey, ("Home-14"), before law enforcement intervened.

17. From on or about December 2, 2016 to on or about March 20, 2019, following each of the aforementioned completed burglaries, BARR and co-conspirators transported certain of the property stolen from the residences referenced in this Information in interstate commerce, including from the District of New Jersey to the Eastern District of Pennsylvania.

All in violation of Title 18, United States Code, Section 371.


FORFEITURE ALLEGATION

1. The United States hereby gives notice to the defendant that, upon his conviction of the offense alleged in this Information, the United States will seek forfeiture, in accordance with 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense and all property traceable to such property.

2. If by any act or omission of the defendant any of the property subject to forfeiture described above:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated to 28 U.S.C. § 2461(c), to seek forfeiture of any other property of such defendant up to the value of the above-described forfeitable property.



PHILIP R. SELLINGER
United States Attorney