

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	HON. ESTHER SALAS
	:	
	:	Criminal No. 17-
v.	:	
	:	
EDUARD VASILICA TICU	:	18 U.S.C. § 1349

INFORMATION

The defendant having waived in open court prosecution by indictment, the Acting United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:

a. Defendant EDUARD VASILICA TICU ("TICU") was a citizen of Romania and resided in Queens, New York.

b. Bank of America and PNC Bank were financial institutions as that term is defined by Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation.

THE CONSPIRACY

2. From in or around March 2015 through in or around July 2016, in the District of New Jersey, and elsewhere, the defendant,

EDUARD VASILICA TICU,

did knowingly and intentionally conspire and agree with others, to execute a scheme and artifice to defraud financial institutions, namely Bank of America and PNC Bank, and to obtain money and property owned by, and under the custody and control of, Bank of America and PNC 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 TICU and others to enrich themselves by withdrawing money from automated teller machines ("ATMs") using counterfeit ATM cards encoded with bank customers' account information that previously had been stolen by devices installed on the ATMs that acquired bank customers' account information and personal identification codes.

MANNER AND MEANS OF THE CONSPIRACY

4. It was part of the conspiracy that the co-conspirators installed "skimming" devices onto the card reader interfaces of bank ATMs and bank ATM vestibule doors. These "skimming" devices captured and recorded information contained in the magnetic strip of customers' ATM cards.

5. It was further part of the conspiracy that TICU and others installed pinhole cameras, concealed within overlay plates designed to blend in with the banks' existing ATM components, onto bank ATMs. These 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 the co-conspirators then transferred the stolen customer account data and customer PIN numbers onto blank ATM cards, thereby creating counterfeit ATM cards ("Counterfeit ATM Cards").

7. It was further part of the conspiracy that TICU and others used the Counterfeit ATM Cards to make unauthorized ATM withdrawals from customer bank accounts.

8. As a result of the foregoing conduct, Bank of America suffered losses that were reasonably foreseeable to TICU in the amount of approximately \$428,581.

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

FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2).

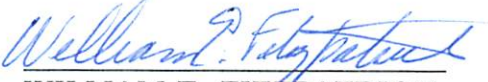
2. The United States hereby gives notice to the defendant, that upon his conviction of the offense charged in this Information, the government will seek forfeiture in accordance with Title 18, United States Code, Section 982(a)(2), which requires any person convicted of such offense to forfeit any property constituting or derived from proceeds obtained directly or indirectly as a result of such offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

- 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 Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b) (1) and Title 28, United States Code, Section 2461(c), to seek forfeiture

of any other property of such defendant up to the value of the forfeitable property described in paragraph 2.


WILLIAM E. FITZPATRICK
Acting United States Attorney

CASE NUMBER: 17-_____

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UNITED STATES OF AMERICA

v.

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INFORMATION FOR

18 U.S.C. § 1349

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