

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Criminal No. 14-____
 :
 VLADIMIR SAUZERESETEO : 18 U.S.C. § 371

INFORMATION

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

Introduction

1. At certain times relevant to this Information:
 - a. Defendant VLADIMIR SAUZERESETEO ("SAUZERESETEO") resided in East Orange, New Jersey.
 - b. B.K., a co-conspirator not named as a defendant herein, was an attorney licensed to practice law in the State of New Jersey.
 - c. M.S., a co-conspirator not named as a defendant herein, was a federal pretrial detainee at the Essex County Correctional Facility ("Essex County Jail") and the Hudson County Correctional Facility. M.S. had been charged by federal criminal complaint with the illegal possession of a firearm.
 - d. The Essex County Jail was a facility in New Jersey that held federal pretrial detainees by direction of, or pursuant

to, a contract or agreement with the United States Attorney General.

e. There was a cooperating witness ("CW-1") incarcerated at the Essex County Jail.

f. There was a second cooperating witness ("CW-2") who was not incarcerated.

The Conspiracy

2. From in or about September 2013 through in or about January 2014, in Essex County, in the District of New Jersey, defendant

VLADIMIR SAUZERESETEO

did knowingly and intentionally conspire and agree with B.K., M.S., and others to commit offenses against the United States, namely providing prohibited objects to an inmate of a prison, including marijuana and tobacco, and an inmate of a prison obtaining and possessing such prohibited objects, contrary to Title 18, United States Code, Sections 1791(a) and (d)(1)(B).

Object of the Conspiracy

3. The object of the conspiracy was to smuggle contraband, including marijuana and tobacco, into the Essex County Jail.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that:

a. Defendant VLADIMIR SAUZERESETEO delivered marijuana and tobacco to B.K. for delivery to M.S. and other inmates at the Essex County Jail.

b. Defendant VLADIMIR SAUZERESETEO delivered cash payments to B.K. for B.K.'s assistance in smuggling contraband into the Essex County Jail.

c. B.K. smuggled the contraband into the Essex County Jail and used an attorney visiting room to deliver it to inmates, including M.S.

d. M.S. sold the marijuana and tobacco to other inmates at the Essex County Jail and accepted payments from those inmates via Western Union money transfers.

e. Defendant VLADIMIR SAUZERESETEO collected the Western Union money transfers sent on behalf of inmates at the Essex County Jail who ordered marijuana and tobacco from M.S.

Overt Acts

5. In furtherance of the conspiracy and in order to effect the object thereof, defendant VLADIMIR SAUZERESETEO and his co-conspirators committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. On or about January 6, 2014, defendant VLADIMIR SAUZERESETEO agreed with CW-2 to smuggle marijuana and tobacco into the Essex County Jail by paying B.K. to deliver the marijuana and tobacco to CW-1.

b. On or about January 7, 2014, M.S. spoke with B.K. on the telephone and asked B.K. to deliver marijuana to CW-1 inside the

Essex County Jail.

c. On or about January 13, 2014, defendant VLADIMIR SAUZERESETEO received \$1,650 in Western Union payments from CW-1 that he used to purchase marijuana and to pay B.K. for delivering the marijuana into the Essex County Jail.

d. On or about January 26, 2014, B.K. entered an attorney visiting room at the Essex County Jail and delivered a package containing marijuana and tobacco to CW-1.

In violation of Title 18, United States Code, Section 371.

Paul J. Fishman/rah
PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 14-

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UNITED STATES OF AMERICA

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INFORMATION FOR

18 U.S.C. § 371

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