

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

RICHARD MELTZ, :
a/k/a "Rick," :

SUPERSEDING INFORMATION

S5 12 Cr. 847 (PGG)

Defendant. :

- - - - - X

COUNT ONE

The United States Attorney charges:

1. From at least in or about the spring of 2011, up to and including in or about January 2013, in the Southern District of New York and elsewhere, RICHARD MELTZ, a/k/a "Rick," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1201.

2. It was a part and an object of the conspiracy that RICHARD MELTZ, a/k/a "Rick," the defendant, and others known and unknown, would unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise, a specific woman ("Victim-1"), and use a means, facility, and instrumentality of interstate commerce in

committing and in furtherance of the commission of the kidnapping, in violation of Title 18, United States Code, Section 1201.

Overt Act

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. In or about September 2012, Richard Meltz, a/k/a "Rick," the defendant, and a co-conspirator not named herein discussed kidnapping Victim-1.

(Title 18, United States Code, Section 371.)

COUNT TWO

The United States Attorney further charges:

4. From at least in or about January 2013, up to and including on or about April 15, 2013, in the Southern District of New York and elsewhere, RICHARD MELTZ, a/k/a "Rick," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1201.

5. It was a part and an object of the conspiracy that RICHARD MELTZ, a/k/a "Rick," the defendant, and others known and unknown, would unlawfully seize, confine, inveigle,

decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise, a female agent of the Federal Bureau of Investigation working in a undercover capacity ("Victim-2"), and use a means, facility, and instrumentality of interstate commerce in committing and in furtherance of the commission of the kidnaping, in violation of Title 18, United States Code, Section 1201.

Overt Act

6. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about March 10, 2013, RICHARD MELTZ, a/k/a "Rick," the defendant, and a co-conspirator not named herein, discussed kidnaping Victim-2 and, in connection with that kidnaping, discussed how to subdue Victim-2 and how to secure a weapon for that purpose.

(Title 18, United States Code, Section 371.)



PREET BHARARA *mb*
United States Attorney

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(18 U.S.C. § 371.)

PREET BHARARA
United States Attorney.
