

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 10-  
 :  
 v. : 18 U.S.C. § 1951(a)  
 :  
 LUIS MORALES : 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 that:

Conspiracy to Obstruct Interstate  
Commerce by Armed Robbery

1. At all times relevant to this Information, defendant Luis Morales ("defendant MORALES") was a resident of the State of New York with experience driving commercial trucks.

2. At all times relevant to this Information, In Style USA, Inc., a distributor of various perfumes and fragrances, was a corporation that operated and maintained a warehouse located in Carlstadt, New Jersey (hereinafter, "the Storage Facility"). In Style USA used the Storage Facility for, among other purposes, storage of various types of perfumes and fragrances that were sold at an In Style USA site located in Manhattan.

3. From in or about December 2009 to in or about February 2010, defendant MORALES agreed and conspired with Alan A. Bannout ("A. BANNOUT"), four uncharged co-conspirators ("co-conspirators #1 through #4"), Gabriel Vargas ("VARGAS"), Anselmo Jimenes, a/k/a "Ansemo Jimenes" ("JIMENES"), and others, including three

members of the New York City Police Department ("NYPD"), Kelvin L. Jones, a/k/a "Mike Smith" ("JONES"), Richard LeBlanca ("LeBLANCA") and Brian Checo ("CHECO"), and one former member of the NYPD, Orlando Garcia ("GARCIA"), to commit an armed robbery of the Storage Facility, and thereafter did endeavor to carry out the armed robbery, of the Storage Facility, targeting in excess of \$500,000 worth of perfume. Aspects of this criminal conduct included, but were not limited to, the following:

a. Approximately one week prior to the armed robbery of the Storage Facility, A. BANNOUT, co-conspirator #1 and VARGAS drove to the Storage Facility to surveil the area in preparation for the robbery.

b. On or about February 8, 2010, defendant MORALES was contacted by VARGAS to participate in the robbery of the Storage Facility in exchange for approximately \$2,500. Among other things, VARGAS enlisted defendant MORALES to drive one of the trucks that were going to be used to remove the merchandise to be stolen from the Storage Facility.

c. On or about February 9, 2010, defendant MORALES met A. BANNOUT, JIMENES, VARGAS, and co-conspirators #1 and #3 at a truck rental facility located in Brooklyn, New York (hereinafter, "the NY Truck Rental Facility"). There, VARGAS paid approximately \$1,600 cash given to him by co-conspirator #1 to rent approximately four box trucks for the transport of the

merchandise to be stolen from the Storage Facility. At the NY Truck Rental Facility, VARGAS provided the rental representative with identifying information from VARGAS's driver's license, and thereafter defendant MORALES, VARGAS, A. BANNOUT and co-conspirator #3 each drove one of the four trucks away from the NY Truck Rental Facility. In the truck that VARGAS drove, there were approximately fifteen (15) day laborers (the "Day Laborers") who were hired by JIMENES to assist with the removal of the stolen merchandise.

d. On or about the same date, LeBLANCA, JONES, CHECO, GARCIA and co-conspirator #4 went to a truck rental facility located in Jersey City, New Jersey (hereinafter, "the NJ Truck Rental Facility"), where two box trucks were rented for the transport of the merchandise to be stolen from the Storage Facility. At the NJ Truck Rental Facility, LeBLANCA, at JONES's request, paid for one of the two rental trucks with LeBLANCA's ATM debit card and GARCIA paid for the second rental truck using his credit card. Thereafter, LeBLANCA and CHECO each drove one of the rental trucks and followed JONES to the Storage Facility.

e. Defendant MORALES, VARGAS, A. BANNOUT, and co-conspirator #3 drove the trucks to a motel located in Jersey City, New Jersey (hereinafter, the "Motel"). Co-conspirator #1 met them at the Motel. Once at the Motel, JIMENES paid for three motel rooms with money provided to him by co-conspirator #1. The

Day Laborers were directed to wait in those rooms.

f. After leaving the Motel, defendant MORALES met with co-conspirators #1, #2 and #3, A. BANNOUT, and VARGAS, at a nearby restaurant to discuss and plan the robbery. Specifically, it was discussed at this meeting that "police officers" were going to use guns to hold the employees of In Style USA hostage while the Day Laborers loaded the merchandise from the Storage Facility into the rental trucks, which were to be driven away from the Storage Facility by defendant MORALES and VARGAS and parked on the street at a nearby pre-determined location.

g. After the meeting at the restaurant, VARGAS picked up JIMENES and the Day Laborers from the Motel and drove them to the Storage Facility. Defendant MORALES drove another rental truck to the Storage Facility.

h. At approximately 6:00 p.m., on or about February 9, 2010, JONES and CHECO, followed shortly thereafter by LeBLANCA, GARCIA and co-conspirator #4, entered the Storage Facility office while brandishing firearms (some police-issued weapons) and displaying NYPD-issued badges. After encountering approximately eleven (11) company employees (hereinafter, collectively referred to as "the Victims"), JONES, CHECO, LeBLANCA, GARCIA and co-conspirator #4 restrained the Victims, tying their hands behind their backs with plastic ties, and holding them hostage.

i. As the Victims were held in the Storage Facility

office, defendant MORALES, VARGAS, JIMENES, co-conspirator #3 and others directed the Day Laborers to load hundreds of boxes of perfume from the Storage Facility onto the rental trucks that were on site.

j. Once a rental truck was filled with merchandise, VARGAS drove that truck away from the Storage Facility and parked it at a nearby pre-determined location with the keys inside. The trucks were to be retrieved by A. BANNOUT and other co-conspirators who would then drive the trucks to a nearby parking lot.

k. Up to four trucks filled with stolen merchandise were driven away from the Storage Facility and parked at a nearby location. While the remaining two rental trucks were being loaded with stolen merchandise, members of the Carlstadt police arrived at the Storage Facility and arrested defendant MORALES and JIMENES.

l. Later that evening, on or about February 9, 2010, VARGAS, A. BANNOUT, co-conspirator #1, JONES, LeBLANCA, CHECO and GARCIA met in a location in New York City in order to concoct a plan to conceal their involvement in the robbery in light of law enforcement's arrest of some of the remaining conspirators, including defendant MORALES and JIMENES, at the Storage Facility.

m. Approximately one week after the robbery, A. BANNOUT drove VARGAS to a parking lot in New Jersey where three

rental trucks with the merchandise stolen from the Storage Facility had been parked since the day after the robbery. One at a time, VARGAS then drove the trucks, following A. BANNOUT, to a storage facility in Staten Island, New York where the stolen merchandise was unloaded by different day laborers and placed in a storage unit at that facility.

4. From in or about December 2009 to in or about February 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant

LUIS MORALES

did knowingly and willfully conspire with A. BANNOUT, co-conspirators #1 through #4, VARGAS, JIMENES, JONES, LeBLANCA, CHECO, GARCIA and others known and unknown, to obstruct, delay and affect commerce and the movement of articles and commodities in commerce by robbery.

In violation of Title 18, United States Code, Section 1951(a).

  
PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 10-

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District of New Jersey

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UNITED STATES OF AMERICA

v.

LUIS MORALES

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**INFORMATION**

**18 U.S.C. § 1951(a)**

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PAUL J. FISHMAN  
*U.S. ATTORNEY NEWARK, NEW JERSEY*

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ERIC T. KANEFISKY  
CHRISTOPHER J. GRAMICCIONI  
*ASSISTANT U.S. ATTORNEYS  
NEWARK, NEW JERSEY  
(973) 645-2700*

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