

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 11-  
: :  
v. : 18 U.S.C. §§ 371, 2113(a),  
: and § 2  
JUAN PEREZ :  
:

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)

1. At all times relevant to this Information:
  - a. the PNC Bank branch located at or around 424 Broad Street, Bloomfield, New Jersey was a "bank" within the meaning of Title 18, United States Code, Section 2113(f), whose deposits were insured by the Federal Deposit Insurance Corporation.
  - b. the PNC Bank branch located at or around 500 Route 10, Whippany, New Jersey was a "bank" within the meaning of Title 18, United States Code, Section 2113(f), whose deposits were insured by the Federal Deposit Insurance Corporation.

2. From in or around June 2010 until in or around August 2010, in Essex and Morris Counties, in the District of New Jersey, and elsewhere, defendant

JUAN PEREZ

did knowingly and intentionally conspire and agree with co-conspirator Nathaniel Barreto to commit an offense against the United States, that is, to take, by force and violence, and by intimidation, from the person or persons of bank employees, property, money and other things of value belonging to, and in the care, custody, control, management, and possession of the banks, contrary to Title 18, United States Code, Section 2113(a).

Object of the Conspiracy

3. It was the object of the conspiracy to rob banks, including, but not limited to, the PNC Bank branch located at or around 424 Broad Street, Bloomfield, New Jersey and the PNC Bank branch located at or around 500 Route 10, Whippany, New Jersey (hereinafter, collectively the "Banks").

Manner and Means of the Conspiracy

4. It was part of the conspiracy that the defendant and co-conspirator Nathaniel Barreto would rob the Banks using toy handguns that closely resembled real firearms (hereinafter, "handgun(s)").

5. It was further part of the conspiracy that the defendant and co-conspirator Nathaniel Barreto agreed that one of

them would enter the Banks wearing a mask and other clothing designed to conceal his identity, while the other co-conspirator waited in the getaway car.

6. It was further part of the conspiracy that the defendant and co-conspirator Nathaniel Barreto agreed that the co-conspirator who entered the Banks would point a handgun at the bank tellers and demand money, thereby directing the bank tellers through force, violence and threat of violence.

7. It was further part of the conspiracy that the defendant and co-conspirator Nathaniel Barreto would discard the handguns after fleeing from the Banks.

#### Overt Acts

8. In furtherance of this conspiracy and to effect its unlawful object, defendant JUAN PEREZ and co-conspirator Nathaniel Barreto committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. On or about August 9, 2010, defendant JUAN PEREZ drove co-conspirator Nathaniel Barreto to the PNC Bank branch located at 424 Broad Street, Bloomfield, New Jersey ("Bank One"), for the purpose of robbing Bank One.

b. On or about August 9, 2010, defendant JUAN PEREZ went into Bank One and scoped Bank One for customers and surveillance cameras.

c. On or about August 9, 2010, defendant JUAN PEREZ returned to the getaway car and reported his observations to co-conspirator Nathaniel Barreto

d. On or about August 9, 2010, co-conspirator Nathaniel Barreto entered Bank One carrying a plastic bag and wearing clothing to conceal his identity, including a mask, hat, and gloves.

e. On or about August 9, 2010, co-conspirator Nathaniel Barreto pointed a toy handgun that closely resembled a real handgun at a bank teller, and demanded that the teller place money into his plastic bag.

f. On or about August 9, 2010, after the bank teller refused to comply with co-conspirator Nathaniel Barreto's demand for money, co-conspirator Nathaniel Barreto exited Bank One without any currency or other property belonging to Bank One.

g. On or about August 9, 2010, after attempting to rob Bank One, defendant JUAN PEREZ and co-conspirator Nathaniel Barreto fled from Bank One in a getaway car.

h. On or about August 17, 2010, defendant JUAN PEREZ drove co-conspirator Nathaniel Barreto to the PNC Bank branch located at 500 Route 10, Whippany, New Jersey ("Bank Two"), for the purpose of robbing Bank Two.

i. On or about August 17, 2010, co-conspirator Nathaniel Barreto entered Bank Two carrying a plastic bag and

wearing clothing to conceal his identity, including a mask, hat, and gloves.

j. On or about August 17, 2010, co-conspirator Nathaniel Barreto pointed a toy handgun that closely resembled a real handgun at a bank teller, demanding that the teller place money into his plastic bag.

k. On or about August 17, 2010, co-conspirator Nathaniel Barreto took United States currency from a teller work station at Bank Two.

l. On or about August 17, 2010, co-conspirator Nathaniel Barreto exited Bank Two with approximately \$4,527 in United States currency and other property belonging to Bank Two.

m. On or about August 17, 2010, after robbing Bank Two, defendant JUAN PEREZ and co-conspirator Nathaniel Barreto attempted to flee from Bank Two, but were apprehended by law enforcement officials.

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

COUNT TWO  
(BANK ROBBERY)

On or about August 9, 2010, in Essex County, in the District of New Jersey, and elsewhere, defendant

JUAN PEREZ

did knowingly, by force and violence, and by intimidation, attempt to take from the person and presence of employees of the PNC Bank branch located at 424 Broad Street, Bloomfield, New Jersey, property and money, and other things of value belonging to, and in the care, custody, control, management, and possession of the Bank, the deposits of which were at that time insured by the Federal Deposit Insurance Corporation, and did knowingly aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Section 2113(a) and Section 2.

COUNT THREE  
(BANK ROBBERY)

On or about August 17, 2010, in Morris County, in the District of New Jersey, and elsewhere, defendant

JUAN PEREZ

did knowingly, by force and violence, and by intimidation, take from the person and presence of employees of the PNC Bank branch located at 500 Route 10, Whippany, New Jersey, property and money in the amount of approximately \$4,527, and other things of value belonging to, and in the care, custody, control, management, and possession of the Bank, the deposits of which were at that time insured by the Federal Deposit Insurance Corporation, and did knowingly aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Section 2113(a) and Section 2.

  
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PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 11-\_\_\_\_\_

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**JUAN PEREZ**

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**INFORMATION FOR**

18 U.S.C. §§ 371, 2113(a) and 2

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**PAUL J. FISHMAN**

*UNITED STATES ATTORNEY, NEWARK, NEW JERSEY*

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