

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 12-
	:	
v.	:	18 U.S.C. § 371
	:	
JELANI BUSTAMONTE	:	<u>I N F O R M A T I O N</u>
	:	

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

Count One  
(Conspiracy to Commit Bank Robbery)

1. At all times relevant to this Information:

a. The deposits of TD Bank, which had a branch located in Westfield, New Jersey, were insured by the Federal Deposit Insurance Corporation.

b. The defendant, JELANI BUSTAMONTE, was an employee of TD Bank who worked at the Westfield, New Jersey branch.

2. In and around September 2011, in Union County, in the District of New Jersey, and elsewhere, the defendant,

JELANI BUSTAMONTE,

did knowingly and intentionally conspire and agree with others to commit an offense against the United States, namely, knowingly taking and attempting to take, by force, violence, and intimidation, from the person and presence of others, money, specifically, approximately \$5,721 belonging to, and in the care,

custody, control, management, and possession of a bank, specifically, TD Bank, located in Westfield, New Jersey, contrary to Title 18, United States Code, Section 2113(a).

Object of the Conspiracy

3. The object of the conspiracy was for defendant JELANI BUSTAMONTE and his co-conspirators to profit through robbing bank tellers by force, violence, and intimidation.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendant JELANI BUSTAMONTE and his co-conspirators planned to rob the Westfield branch of TD Bank by demanding money from bank tellers.

5. It was part of the conspiracy that defendant JELANI BUSTAMONTE provided information that he gained as a bank employee about the security measures, business operations, and layout of Westfield branch of TD Bank to his co-conspirators so that the robbery would succeed.

6. It was part of the conspiracy that the co-conspirators agreed with defendant JELANI BUSTAMONTE that they would carry out the robbery and then share the proceeds with defendant BUSTAMONTE.

Overt Acts

7. In furtherance of the conspiracy, and to achieve the object thereof, in and around September 2011, defendant JELANI BUSTAMONTE and others committed and caused to be committed

the following overt acts, among others, in the District of New Jersey and elsewhere:

a. Defendant JELANI BUSTAMONTE provided one of his co-conspirators ("CC-1") with information about the following: (i) the layout of the Westfield branch of TD Bank, (ii) the location of the safe; (iii) the amount of cash that was kept in teller drawers; and (iv) when bank tellers push their emergency buttons.

b. Defendant JELANI BUSTAMONTE also told CC-1 that when CC-1 was robbing the bank, CC-1 should demand "loose bills" and not strapped money.

c. Defendant JELANI BUSTAMONTE also advised CC-1 on how to exit the bank to avoid or delay triggering the alarm system.

d. On or about September 11, 2011, CC-1 robbed the Westfield branch of TD Bank of \$5,721 and fled the bank.

e. Defendant JELANI BUSTAMONTE, who was working at the Westfield branch of TD Bank on or about September 11, 2011 when CC-1 robbed the bank, recognized CC-1 but did not disclose CC-1's identity to bank personnel or law enforcement.

All in violation of Title 18, United States Code, Section 371.

Count Two  
(Conspiracy to Commit Bank Robbery)

1. Paragraph 1 of Count One of this Information is hereby realleged and incorporated by reference as though set forth fully herein.

2. From in and around November 2011 through in and around December 2011, in Union County, in the District of New Jersey, and elsewhere, the defendant,

JELANI BUSTAMONTE,

did knowingly and intentionally conspire and agree with others to commit an offense against the United States, namely, knowingly taking and attempting to take, by force, violence, and intimidation, from the person and presence of others, money, specifically, approximately \$200,000, belonging to, and in the care, custody, control, management, and possession of a bank, specifically, TD Bank, located in Westfield, New Jersey, contrary to Title 18, United States Code, Section 2113(a).

Object of the Conspiracy

3. The object of the conspiracy was for defendant JELANI BUSTAMONTE and his co-conspirators to profit from robbing a vault of TD Bank by force, violence, and intimidation.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendant JELANI BUSTAMONTE and his co-conspirators planned to access and rob the vault of the Westfield branch of TD Bank.

5. It was further part of the conspiracy that defendant JELANI BUSTAMONTE would share information that he gained as an employee of TD Bank about when and how the bank's vault could be opened.

6. It was a further part of the conspiracy that the defendant's co-conspirators agreed with defendant JELANI BUSTAMONTE that they would rob the vault in the Westfield branch of TD Bank by force and intimidation and then share the proceeds with defendant JELANI BUSTAMONTE.

#### Overt Acts

7. In furtherance of the conspiracy, and to achieve the objects thereof, from in and around November 2011 through in and around December 2011, defendant JELANI BUSTAMONTE and others committed and caused to be committed the following overt acts, among others, in the District of New Jersey and elsewhere:

a. Defendant JELANI BUSTAMONTE, through in-person and phone communications, provided information to CC-1 about: (i) the amount of money stored inside the vault; (ii) the dates of the week when the vault would be replenished with cash; (iii) the procedure for opening the vault; (iv) the employees who possessed the codes necessary to access the vault; and (v) the time of day when the vault would be opened.

b. On or about November 29, 2011, defendant JELANI BUSTAMONTE sent CC-1 a text message stating that on a

certain day of the week there could be approximately "[\\$]200,000" inside the vault.

c. Defendant JELANI BUSTAMONTE told CC-1 that CC-1 should take one other person to rob the vault.

d. Defendant JELANI BUSTAMONTE agreed with CC-1 that defendant JELANI BUSTAMONTE would receive between \$40,000 and \$50,000 of the proceeds from the vault.

All in violation of Title 18, United States Code, Section 371.

Paul J. Fishman/rah

PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 12-

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

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**UNITED STATES OF AMERICA**

**v.**

**JELANI BUSTAMONTE**

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**INFORMATION FOR**

Title 18, United States Code, Section 371

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**PAUL J. FISHMAN**

*UNITED STATES ATTORNEY, NEWARK, NEW JERSEY*

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