IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

CR 10 184-01 S

UNITED STATES OF AMERICA, v. JASON W. PLEAU, JOSE A. SANTIAGO, and KELLEY M. LAJOIE, Defendants.	In violation of: 18 U.S.C. § 1951(a)(Conspiracy to commit robbery affecting commerce) (Count I); 18 U.S.C. §§ 2, 1951(a) (Robbery affecting commerce, and aiding and abetting)(Count II); 18 U.S.C. §§ 2, 924(c)(1)(A)&(j)(1) (Using, carrying, possessing, and discharging a firearm, during and relation to a crime of violence, death resulting)(Count III). NOTICE OF SPECIAL FINDINGS

INDICTMENT

The Grand Jury charges that:

COUNT ONE
(Conspiracy to Commit Robbery Affecting Commerce)

From a time unknown through in or about September 23, 2010, in the District of Rhode Island and elsewhere within the jurisdiction of the Court, defendants JASON W. PLEAU, JOSE A. SANTIAGO, KELLEY M. LAJOIE, and others unknown to the Grand Jury, did knowingly, intentionally, and wilfully combine, conspire, confederate and agree with each other and others to obstruct, delay, and affect commerce by

robbery, to wit: a plan to rob David D. Main of United States currency and other property in his possession, against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property in his custody and possession, in violation of 18 U.S.C. § 1951(a).

Introduction

At all times relevant to the conspiracy:

1. David D. Main (hereafter referred to as "Mr. Main") was a 49 year-old resident of Lincoln, Rhode Island. He was employed as the manager of a Shell gasoline station located at 1325 Diamond Hill Road, Woonsocket, Rhode Island (hereafter referred to as "the Shell Station").

2. The Shell Station is owned by Colbea Enterprises LLC, a limited liability company organized under the laws of Delaware. Colbea Enterprises LLC also owns other Shell gasoline stations in Rhode Island and Massachusetts. The Shell Station is managed and operated by East Side Management Incorporated which also manages numerous other gasoline stations in Rhode Island and Massachusetts. The petroleum products sold at the Shell Station are provided by Motiva Corporation, a limited liability company organized under the laws of Delaware, and its affiliates, and is imported from outside the State of Rhode Island. The Shell Station also operates a small convenience store and offers for sale a variety of products, including candy, soft drink beverages, cigarettes, bottled water, and coffee which are manufactured outside the State of Rhode Island.

3. As the manager of the Shell Station, Mr. Main was charged with making daily deposits of the Shell Station proceeds, that is, United States currency and other financial instruments, at the Citizens Bank branch located at 1675 Diamond Hill Road, Woonsocket, Rhode Island (hereafter referred to as "Citizens Bank").

4. Citizens Bank is a federally insured financial institution, with branches throughout the United States.

Manner and Means of the Conspiracy

5. It was a part of the conspiracy that defendants JASON W. PLEAU, JOSE A. SANTIAGO, and KELLEY M. LAJOIE, would by force, violence, and intimidation, and by threats of force and violence, take money and property, including United States currency, that was the property of the Shell Station, from the manager of the Shell Station.

6. It was further a part of the conspiracy that each of the defendants, JASON W. PLEAU, JOSE A. SANTIAGO, and KELLEY M. LAJOIE, would encourage, support, assist, counsel, aid, and abet each other in the planned robbery.

7. It was further a part of the conspiracy that defendants JASON W. PLEAU, JOSE A. SANTIAGO, and KELLEY M. LAJOIE, would place the Shell Station manager in fear of injury and violence by using and threatening to use a firearm and force to cause injury.

8. It was further a part of the conspiracy that defendants JASON W. PLEAU, JOSE A. SANTIAGO, and KELLEY M. LAJOIE, would discard,

conceal, and destroy evidence related to the robbery, and would divide the proceeds of the robbery among the co-conspirators.

Object of the Conspiracy

9. By this conspiracy, defendants JASON W. PLEAU, JOSE A. SANTIAGO, and KELLEY M. LAJOIE, intended to unlawfully obtain money and property to which they were not legally entitled and thereby be unlawfully enriched.

Overt Acts in Furtherance of the Conspiracy

10. In furtherance of the conspiracy and to effect the objects of the conspiracy, defendants JASON W. PLEAU, JOSE A. SANTIAGO, KELLEY M. LAJOIE, and others unknown to the Grand Jury, committed at least one of the following overt acts among others in the District of Rhode Island and elsewhere:

a. From a time unknown, but at least as of September 18, 2010, defendants JASON W. PLEAU, JOSE A. SANTIAGO, and KELLEY M. LAJOIE devised a plan to rob Mr. Main, the manager of the Shell Station, of Shell Station proceeds.

b. On or about September 18, 2010, defendants JOSE A. SANTIAGO and KELLEY M. LAJOIE obtained possession of a white 1996 Ford E-450 truck bearing Rhode Island registration 60867 with vehicle identification number (VIN) 1FDLE40F2THA57862 ("the white truck"), and retained possession of it until the afternoon of September 20, 2010.

c. On or about September 20, 2010, defendant JASON W. PLEAU armed himself with a revolver which was loaded with .38 caliber ammunition.

d. On or about September 20, 2010, defendants JASON W. PLEAU, JOSE A. SANTIAGO, and KELLEY M. LAJOIE, using defendant JASON W. PLEAU's motor vehicle, to wit, a gold/tan 1998 Chevrolet Malibu bearing Rhode Island registration 986319 and VIN 1G1NE52M7W6213174 ("Pleau's car"), drove to the Shell Station.

e. On or about September 20, 2010, defendants JASON W. PLEAU, JOSE A. SANTIAGO, and KELLEY M. LAJOIE entered the Shell Station, observed Mr. Main, the manager of the Shell Station, and observed Mr. Main's vehicle parked outside the Shell Station.

f. On or about September 20, 2010, defendant JOSE A. SANTIAGO waited for defendant JASON W. PLEAU in the white truck, at a location off Village Road, located to the rear of Citizens Bank, in Woonsocket, Rhode Island.

g. On or about September 20, 2010, defendant JASON W. PLEAU concealed himself in an area adjacent to the Citizens Bank parking lot while waiting for Mr. Main to arrive.

h. On or about September 20, 2010, defendant KELLEY M. LAJOIE, while operating Pleau's car, maintained a lookout of the Shall Station to determine when Mr. Main left the station.

i. On or about September 20, 2010, defendant KELLEY M. LAJOIE, called defendant JASON W. PLEAU to inform him that Mr. Main just left

the Shell Station and was driving to Citizens Bank.

j. On or about September 20, 2010, defendant JASON W. PLEAU observed Mr. Main park his vehicle in the parking lot of Citizens Bank. Defendant JASON W. PLEAU emerged from his hiding location wearing a ski mask, pointed the .38 caliber revolver at Mr. Main, and demanded that Mr. Main give him the money.

k. On or about September 20, 2010, as Mr. Main was running away, defendant JASON W. PLEAU fired the .38 caliber revolver multiple times, and shot Mr. Main in the head, causing the death of Mr. Main.

l. On or about September 20, 2010, defendant JASON W. PLEAU seized the bank deposit bag Mr. Main was carrying, which contained $12,542 in United States currency, more or less, which funds constituted proceeds of the Shell Station.

m. On or about September 20, 2010, immediately after shooting Mr. Main in the head and seizing the bank deposit bag, defendant JASON W. PLEAU fled Citizens Bank, ran through a wooded area located to the rear of Citizens Bank, and entered the white truck operated by defendant JOSE A. SANTIAGO.

n. On or about September 20, 2010, defendant JOSE A. SANTIAGO drove the white truck, with defendant JASON W. PLEAU inside, to JASON W. PLEAU's residence located at 14 Lisbon Street, second floor, Providence, Rhode Island.

o. On or about September 20, 2010, defendants JASON W. PLEAU, JOSE A. SANTIAGO, and KELLEY M. LAJOIE met at 14 Lisbon Street, second

floor, Providence, Rhode Island, where they divided up the proceeds from the robbery of Mr. Main.

p. On or about September 20, 2010, defendants JASON W. PLEAU, JOSE A. SANTIAGO, and KELLEY M. LAJOIE wiped down the white truck in an effort to remove fingerprints and other evidence linking them to the robbery and shooting of Mr. Main and left it at a location in Providence, Rhode Island.

q. On or about September 20, 2010, defendant JASON W. PLEAU went to Donigian Park in Providence, Rhode Island, where he threw the Citizens Bank deposit bag he had stolen from Mr. Main into the Woonasquatucket River.

r. On or about September 21, 2010, defendant JOSE A. SANTIAGO gave proceeds from the robbery of Mr. Main to one or more other persons, known to the Grand Jury.

s. Between on or about September 20, 2010, and September 21, 2010, defendants JASON W. PLEAU, JOSE A. SANTIAGO, and KELLEY M. LAJOIE, purchased new cellular telephones to replace cellular telephones used by them during the robbery of Mr. Main.

t. On or about September 22, 2010, defendant JASON W. PLEAU traveled by bus to New York City, New York, so as to evade capture by law enforcement.

All in violation of 18 U.S.C. § 1951(a).

COUNT TWO
(Robbery Affecting Commerce)

On or about September 20, 2010, in the District of Rhode Island, defendants JASON W. PLEAU, JOSE A. SANTIAGO, and KELLEY M. LAJOIE did knowingly and intentionally obstruct, delay, and affect commerce, and attempt to obstruct, delay, and affect commerce, by committing robbery, in that the defendants did unlawfully take and obtain property consisting of United States currency from the person of, and in the presence of, David D. Main, against his will, by means of actual and threatened force, violence and fear of injury, immediate and future, to his person, that is, the defendants used, carried, possessed, and brandished a firearm, and discharged said firearm, in the presence of David D. Main and demanded that he relinquish the United States currency in his possession, and did aid, abet, counsel, command, and induce one another to commit said offense.

In violation of 18 U.S.C. § 1951(a) and 18 U.S.C. § 2.

COUNT THREE
(Possessing, Using, Carrying, and Discharging a Firearm in Relation to a Crime of Violence)

On or about September 20, 2010, in the District of Rhode Island, defendants JASON W. PLEAU, JOSE A. SANTIAGO, and KELLEY M. LAJOIE did knowingly possess, use, carry, brandish, and discharge a firearm, to wit a .38 caliber revolver, during and in relation to and in furtherance of the commission of a crime of violence for which the defendants may be prosecuted in a court of the United States, to wit: Conspiracy to Commit Robbery Affecting Commerce, in violation of 18 U.S.C. § 1951(a), as charged in Count One of this Indictment; and, Interference with Commerce by Robbery, in violation of 18 U.S.C. § 1951(a), as charged in Count Two of this Indictment, which are re-alleged and incorporated as though fully set forth herein, and in the course of so doing, did cause the death of a person through the use of a firearm, which killing is a murder as defined in 18 U.S.C. § 1111(a), in that the defendants, with malice aforethought, unlawfully killed another human being, to wit: David D. Main, willfully, deliberately, maliciously, with premeditation, and in the perpetration of a robbery, and did aid and abet, counsel, command, induce, and cause one another to commit said offense.

All in violation of 18 U.S.C. §§ 924(c)(1)(A)(i),(ii),(iii) & (j)(1) and 18 U.S.C. § 2.

NOTICE OF SPECIAL FINDINGS AS TO JASON W. PLEAU

The allegations of Count Three of this Indictment are hereby re-alleged as if fully set forth herein and incorporated by reference.

As to Count Three, the defendant JASON W. PLEAU:

(1) was more than 18 years of age at the time of the offense (18 U.S.C. § 3591(a)(2));

(2) intentionally killed David D. Main (18 U.S.C. § 3591(a)(2)(A));

(3) intentionally inflicted serious bodily injury that resulted in the death of David D. Main (18 U.S.C. § 3591(a)(2)(B));

(4) intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants of the offense, and David D. Main died as a direct result of the act (18 U.S.C. § 3591(a)(2)(C));

(5) intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and David D. Main died as a direct result of the act (18 U.S.C. § 3591(a)(2)(D));

(6) committed the offense described in Count Three subsequent to two or more convictions for State offenses punishable by a term of imprisonment of more than one year, committed on different occasions,

involving the infliction of, or attempted infliction of, serious bodily injury or death upon another person (18 U.S.C. § 3592(c)(4));

(7) knowingly created a grave risk of death to one or more persons in addition to the victim of the offense (18 U.S.C. § 3592(c)(5)); and,

(8) committed the offense described in Count Three as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value (18 U.S.C. § 3592(c)(8)).

All pursuant to 18 U.S.C. §§ 3591 and 3592.

NOTICE OF SPECIAL FINDINGS AS TO JOSE A. SANTIAGO

The allegations of Count Three of this Indictment are hereby re-alleged as if fully set forth herein and incorporated by reference.

As to Count Three, the defendant JOSE A. SANTIAGO:

(1) was more than 18 years of age at the time of the offense (18 U.S.C. § 3591(a)(2));

(2) intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants of the offense, and David D. Main died as a direct result of the act (18 U.S.C. § 3591(a)(2)(C));

(3) intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and David D. Main died as a direct result of the act (18 U.S.C. § 3591(a)(2)(D));

(4) committed the offense described in Count Three subsequent to two or more convictions for State offenses punishable by a term of imprisonment of more than one year, committed on different occasions, involving the infliction of, or attempted infliction of, serious bodily injury upon another person (18 U.S.C. § 3592(c)(4));

(5) knowingly created a grave risk of death to one or more persons in addition to the victim of the offense (18 U.S.C. §

3592(c)(5)); and,

(6) committed the offense described in Count Three as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value (18 U.S.C. § 3592(c)(8)).

All pursuant to 18 U.S.C. §§ 3591 and 3592.

NOTICE OF SPECIAL FINDINGS AS TO KELLEY M. LAJOIE

The allegations of Count Three of this Indictment are hereby re-alleged as if fully set forth herein and incorporated by reference.

As to Count Three, the defendant KELLEY M. LAJOIE:

(1) was more than 18 years of age at the time of the offense (18 U.S.C. § 3591(a)(2));

(2) intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and David D. Main died as a direct result of the act (18 U.S.C. § 3591(a)(2)(D)); and,

(3) knowingly created a grave risk of death to one or more persons in addition to the victim of the offense (18 U.S.C. § 3592(c)(5)).

All pursuant to 18 U.S.C. §§ 3591 and 3592.

A TRUE BILL:

REDACTED

THE UNITED STATES OF AMERICA
By its attorneys:

PETER F. NERONHA
UNITED STATES ATTORNEY

ADI K. GOLDSTEIN
Deputy Criminal Chief

WILLIAM J. FERLAND
Assistant U.S. Attorney

Dated: 12/14/2010

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. _____

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile

☐ Pre-Indictment Plea ☐ Superseding ☐ Indictment ☐ Information ☐ Defendant Added ☐ Charges/Counts Added

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND
Divisional Office

Name and Office of Person Furnishing Information on THIS FORM: PETER F. NERONHA ☒ U.S. Atty ☐ Other U.S. Agency
Phone No. _____

Name of Asst. U.S. Attorney (if assigned): ADI GOLDSTEIN

USA vs.

Defendant: Jason Wayne Pleau

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REDACTED

☐

Birth Date

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PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court (give name of court)

☐ this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of: ☐ U.S. Atty ☐ Defense

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

☒ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAG. JUDGE CASE NO. 1:10-MJ-275 DLM

Place of offense _____ County

Issue: ☐ Warrant ☐ Summons

Location Status:

Arrest Date _____ or Date Transferred to Federal Custody _____

☐ Currently in Federal Custody
☒ Currently in State Custody
☒ Writ Required
☐ Currently on bond
☐ Fugitive

Defense Counsel (if any): _____

☐ FPD ☐ CJA ☐ RET'D
☐ Appointed on Target Letter

☒ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 3

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	SEE ATTACHED		☒ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor

Attachment to
Defendant Information Relative to a Criminal Action – In U.S. District Court

Defendant: Jason W. Pleau

Count I: Conspiracy to Commit Robbery Affecting Commerce – 18 U.S.C. § 1951(a).

Max Penalties: 18 U.S.C. § 1951(a) – 20 years imprisonment, $250,000 fine, 3 years supervised release and $100 special assessment.

Count II: Robbery Affecting Commerce – 18 U.S.C. § 1951(a) and 18 U.S.C. § 2.

Max Penalties: 18 U.S.C. § 1951(a) and 18 U.S.C. § 2 – 20 years imprisonment, $250,000 fine, 3 years supervised release and $100 special assessment.

Count III: Possession, Using, Carrying, and Discharging a Firearm in Relation to a Crime of Violence – 18 U.S.C. §§ 924(c)(1)(A)(i), (ii), (iii) & (j) (1) and 18 U.S.C. § 2.

Max Penalties: 18 U.S.C. §§ 924(c)(1)(A)(i), (ii), (iii) & (j) (1) and 18 U.S.C. § 2 – Death or any term or years up to life, $250,000 fine, 5 years supervised release and $100 special assessment (consecutive to Counts I and II).

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO.

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile

☐ Pre-Indictment Plea ☐ Superseding ☐ Indictment ☐ Information ☐ Defendant Added ☐ Charges/Counts Added

USA vs.

Defendant: Jose Alibal Santiago

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Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

Divisional Office

Name and Office of Person Furnishing Information on THIS FORM PETER F. NERONHA ☒ U.S. Atty ☐ Other U.S. Agency

Phone No.

Name of Asst. U.S. Attorney (if assigned) ADI GOLDSTEIN

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court (give name of court)

☐ this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of: ☐ U.S. Atty ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

☒ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAG. JUDGE CASE NO. 1:10-MJ-0276 DLM

Place of offense County

Issue: ☐ Warrant ☐ Summons

Location Status:

Arrest Date 12/7/2010 or Date Transferred to Federal Custody

☒ Currently in Federal Custody Being held at ACI

☐ Currently in State Custody

☐ Writ Required

☐ Currently on bond

☐ Fugitive

Defense Counsel (if any):

☐ FPD ☐ CJA ☐ RET'D

☐ Appointed on Target Letter

☒ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

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			☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor

Attachment to
Defendant Information Relative to a Criminal Action – In U.S. District Court

Defendant: Jose A. Santiago

Count I: Conspiracy to Commit Robbery Affecting Commerce – 18 U.S.C. § 1951(a).

Max Penalties: 18 U.S.C. § 1951(a) – 20 years imprisonment, $250,000 fine, 3 years supervised release and $100 special assessment.

Count II: Robbery Affecting Commerce – 18 U.S.C. § 1951(a) and 18 U.S.C. § 2.

Max Penalties: 18 U.S.C. § 1951(a) and 18 U.S.C. § 2 – 20 years imprisonment, $250,000 fine, 3 years supervised release and $100 special assessment.

Count III: Possession, Using, Carrying, and Discharging a Firearm in Relation to a Crime of Violence – 18 U.S.C. §§ 924(c)(1)(A)(i), (ii), (iii) & (j) (1) and 18 U.S.C. § 2.

Max Penalties: 18 U.S.C. §§ 924(c)(1)(A)(i), (ii), (iii) & (j) (1) and 18 U.S.C. § 2 – Death or any term or years up to life, $250,000 fine, 5 years supervised release and $100 special assessment (consecutive to Counts I and II).

PER 18 U.S.C. 3170

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. _____

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile

☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added

☐ Indictment ☐ Charges/Counts Added

☐ Information

USA vs.

Defendant: Kelley Marie Lajoie

Address: **REDACTED**

☐ Inter

Birth Date 8/2 ble)

Social Se

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND
Divisional Office

Name and Office of Person Furnishing Information on THIS FORM PETER F. NERONHA

☒ U.S. Atty ☐ Other U.S. Agency

Phone No. _____

Name of Asst. U.S. Attorney (if assigned) ADI GOLDSTEIN

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court (give name of court)

☐ this person/proceeding transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. Atty ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant. (Notice of Related Case must still be filed with the Clerk.)

☒ prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAG. JUDGE CASE NO. 1:10-MJ-0232 DLM

Place of offense _____ County

DEFENDANT

Issue: ☐ Warrant ☐ Summons

Location Status:

Arrest Date _____ or Date Transferred to Federal Custody _____

☒ Currently in Federal Custody

☐ Currently in State Custody

☐ Writ Required

☐ Currently on bond

☐ Fugitive

Defense Counsel (if any): _____

☐ FPD ☐ CJA ☐ RET'D

☐ Appointed on Target Letter

☒ This report amends AO 257 previously submitted

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			☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor
			☐ Felony ☐ Misdemeanor

Attachment to
Defendant Information Relative to a Criminal Action – In U.S. District Court

Defendant: Kelley M. Lajoie

Count I: Conspiracy to Commit Robbery Affecting Commerce – 18 U.S.C. § 1951(a).

Max Penalties: 18 U.S.C. § 1951(a) – 20 years imprisonment, $250,000 fine, 3 years supervised release and $100 special assessment.

Count II: Robbery Affecting Commerce – 18 U.S.C. § 1951(a) and 18 U.S.C. § 2.

Max Penalties: 18 U.S.C. § 1951(a) and 18 U.S.C. § 2 – 20 years imprisonment, $250,000 fine, 3 years supervised release and $100 special assessment.

Count III: Possession, Using, Carrying, and Discharging a Firearm in Relation to a Crime of Violence – 18 U.S.C. §§ 924(c)(1)(A)(i), (ii), (iii) & (j) (1) and 18 U.S.C. § 2.

Max Penalties: 18 U.S.C. §§ 924(c)(1)(A)(i), (ii), (iii) & (j) (1) and 18 U.S.C. § 2 – Death or any term or years up to life, $250,000 fine, 5 years supervised release and $100 special assessment (consecutive to Counts I and II).