

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 14-_____
	:	
LARRY MCRAE	:	18 U.S.C. §§ 1951(a)
	:	924(c)(1)(A)(iii), and 2.
	:	

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
(Hobbs Act Robbery)

On or about June 30, 2012, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

LARRY MCRAE,

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), namely, by robbing a commercial establishment in Newark, New Jersey of property, and did commit and threaten physical violence to persons and property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a) and Title 18, United States Code, Section 2.

COUNT TWO
(Hobbs Act Robbery)

On or about June 30, 2012, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

LARRY MCRAE,

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), namely, by robbing a commercial establishment in Newark, New Jersey of property, and did commit and threaten physical violence to persons and property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a) and Title 18, United States Code, Section 2.

COUNT THREE
(Hobbs Act Robbery)

On or about August 29, 2012, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

LARRY MCRAE,

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), namely, by robbing a commercial establishment in Newark, New Jersey of property, and did commit and threaten physical violence to persons and property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a) and Title 18, United States Code, Section 2.

COUNT FOUR
(Hobbs Act Robbery)

On or about September 1, 2012, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

LARRY MCRAE,

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), namely, by robbing a commercial establishment in Newark, New Jersey of property, and did commit and threaten physical violence to persons and property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a) and Title 18, United States Code, Section 2.

COUNT FIVE
(Hobbs Act Robbery)

On or about September 5, 2012, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

LARRY MCRAE,

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), namely, by robbing a commercial establishment in Newark, New Jersey of property, and did commit and threaten physical violence to persons and property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a) and Title 18, United States Code, Section 2.

COUNT SIX
(Hobbs Act Robbery)

On or about September 15, 2012, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

LARRY MCRAE,

did knowingly and willfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), namely, by robbing a commercial establishment in Newark, New Jersey of property, and did commit and threaten physical violence to persons and property in furtherance thereof.

In violation of Title 18, United States Code, Section 1951(a) and Title 18, United States Code, Section 2.

COUNT SEVEN

(Discharging a Firearm During a Crime of Violence)

On or about September 15, 2012, in Essex County, in the District of New Jersey and elsewhere, the defendant,

LARRY MCRAE,

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, namely, the robbery of a commercial establishment in Newark, New Jersey, which forms a part of the violation of Title 18, United States Code, Section 1951(a), as charged in Count Six of this Information, did knowingly use and carry a firearm, which was discharged.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii) and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

1. The allegations contained in Counts One through Seven of this Information are incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii), set forth in Count Six of this Information, the defendant

LARRY MCRAE,

shall forfeit to the United States any firearm and ammunition involved in or used in the commission of that offense, including the following: (1) one Smith & Wesson .357 Magnum revolver, bearing serial number 59X21; and (2) five (5) rounds of ammunition.

All pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).



PAUL J. FISHMAN
United States Attorney