

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No.  
: :  
: 18 U.S.C. § 371  
v. : 18 U.S.C. § 1951  
: 18 U.S.C. § 2113(a)  
: 18 U.S.C. § 2113(d)  
GARY BOHANAN : 18 U.S.C. § 2  
: :  
: S U P E R S E D I N G  
: I N D I C T M E N T

The Grand Jury in and for the District of New Jersey,  
sitting at Newark, charges:

COUNT ONE  
(Conspiracy)

1. At all times relevant to this Superseding Indictment:
  - a. McDonald's was a commercial establishment located at 8101 Tonnelle Avenue, North Bergen, New Jersey, engaged in the sale of prepared foods, and other items that moved in, were transferred in, and affected interstate and foreign commerce.
  - b. Le Chateau was a commercial establishment located at 6701 Park Avenue, North Bergen, New Jersey, engaged in the sale of prepared foods, and other items that moved in, were transferred in, and affected interstate and foreign commerce.
  - c. Sovereign Bank was a bank located at 1322A Paterson Plank Road, Secaucus, New Jersey.
  - d. TD Bank was a bank located at 410 Fairview Avenue,

Fairview, New Jersey.

e. The deposits of Sovereign Bank and TD Bank were insured by the Federal Deposit Insurance Corporation.

2. From on or about July 10, 2013, through on or about July 26, 2013, in the District of New Jersey and elsewhere, defendant

GARY BOHANAN

did knowingly and intentionally conspire and agree with A.F., R.L., J.C., and others to commit offenses against the United States, that is:

a. to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, and to commit and threaten physical violence to persons and property in furtherance of a plan and purpose to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, contrary to Title 18, United States Code, Section 1951; and

b. to by force, violence, and intimidation, knowingly take and attempt to take from the person and presence of others money belonging to, and in the care, custody, control, management, and possession of banks, the deposits of which were then insured by the Federal Deposit Insurance Corporation and in committing each of these bank robberies to assault a person

and put in jeopardy the life of a person by the use of a dangerous weapon, contrary to Title 18, United States Code, Sections 2113(a) and (d).

Object of the Conspiracy

3. It was the object of the conspiracy to obtain money and other things of value by robbery, force, violence, and/or intimidation from banks and commercial establishments.

Manner and Means

4. It was part of the conspiracy that defendant GARY BOHANAN and his co-conspirators would plan robberies of banks, commercial establishments, and agents of commercial establishments.

5. It was a further part of the conspiracy that defendant GARY BOHANAN and his co-conspirators would, in carrying out these robberies, utilize gloves, masks, and other face coverings to conceal their identities.

6. It was a further part of the conspiracy that defendant GARY BOHANAN and his co-conspirators would identify agents of commercial establishments carrying money and conduct surveillance of the same to facilitate the planning and execution of the robberies.

7. It was further a part of the conspiracy that during the robberies of banks, commercial establishments, and agents of commercial establishments, defendant GARY BOHANAN would use and

brandish dangerous weapons.

8. It was further a part of the conspiracy that during certain of the robberies, defendant GARY BOHANAN would use and brandish a firearm.

Overt Acts

9. In furtherance of the conspiracy and to effect its unlawful object, defendant GARY BOHANAN and his co-conspirators committed, and caused to be committed, the following overt acts in the District of New Jersey and elsewhere:

a. On or about July 10, 2013, defendant GARY BOHANAN and co-conspirator R.L. used a handgun to rob the McDonald's located at 8101 Tonnelle Avenue, North Bergen, New Jersey and fled in a car driven by co-conspirator J.C.

b. On or about July 18, 2013, defendant GARY BOHANAN and co-conspirator A.F. used a handgun to rob Victim 1, the owner of Le Chateau restaurant, located at 6701 Park Avenue in West New York, New Jersey, after Victim 1 left the restaurant.

c. On or about July 18, 2013, prior to the robbery of Victim 1, co-conspirator R.L. conducted surveillance of the restaurant and communicated to defendant GARY BOHANAN and co-conspirator A.F. when Victim 1 closed the restaurant and appeared to be driving home.

d. On or about July 22, 2013, defendant GARY BOHANAN and co-conspirator A.F. used an air pistol to rob Sovereign Bank, located at 1322A Paterson Plank Road, Secaucus, New Jersey, and fled in a car driven by co-conspirator J.C.

e. On or about July 26, 2013, defendant GARY BOHANAN and co-conspirator A.F. used an air pistol and a knife to rob TD Bank, located at 410 Fairview Avenue, Fairview, New Jersey, and A.F. fled in a car driven by J.C.

f. The proceeds of the conspiracy were shared by defendant GARY BOHANAN, co-conspirator A.F., co-conspirator R.L., co-conspirator J.C., and others.

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

COUNT TWO  
(Hobbs Act Robbery)

1. The allegations set forth in paragraphs 1(a) and 4 through 9 of Count One of this Superseding Indictment are re-alleged and incorporated herein.

2. On or about July 10, 2013, in Bergen County, in the District of New Jersey, and elsewhere, defendant

GARY BOHANAN

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce by robbery and commit and threaten physical violence to employees of McDonald's, in furtherance of a plan and purpose to commit robbery.

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

**COUNT THREE**  
**(Hobbs Act Robbery)**

1. The allegations set forth in paragraphs 1(b) and 4 through 9 of Count One of this Superseding Indictment are re-alleged and incorporated herein.

2. On or about July 18, 2013, in Bergen and Hudson Counties, in the District of New Jersey, and elsewhere, defendant

GARY BOHANAN

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in commerce by robbery and commit and threaten physical violence to Victim 1, the owner of Le Chateau restaurant, in furtherance of a plan and purpose to commit robbery.

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

COUNT FOUR  
(Bank Robbery)

1. The allegations set forth in paragraphs 1(c), 1(e), and 4 through 9 of Count One of this Superseding Indictment are re-alleged and incorporated herein.

2. On or about July 22, 2013, in Hudson County, in the District of New Jersey and elsewhere, defendant

GARY BOHANAN,

did by force, violence, and intimidation, knowingly take from the person and presence of employees of Sovereign Bank \$21,961.46 belonging to, and in the care, custody, control, management, and possession of Sovereign Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing this bank robbery did assault a person and put in jeopardy the life of a person by the use of a dangerous weapon, that is, an air pistol.

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

COUNT FIVE  
(Bank Robbery)

1. The allegations set forth in paragraphs 1(d), 1(e), and 4 through 9 of Count One of this Superseding Indictment are re-alleged and incorporated herein.

2. On or about July 26, 2013, in Bergen County, in the District of New Jersey and elsewhere, defendant

GARY BOHANAN,

did by force, violence, and intimidation, knowingly take from the person and presence of employees of TD Bank \$16,062 belonging to, and in the care, custody, control, management, and possession of TD Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing this bank robbery did assault a person and put in jeopardy the life of a person by the use of dangerous weapons, that is, an air pistol and a knife.

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

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 14-

---

---

United States District Court  
District of New Jersey

---

---

UNITED STATES OF AMERICA

v.

GARY BOHANAN

---

---

SUPERSEDING INDICTMENT FOR

18 U.S.C. § 371

18 U.S.C. § 1951

18 U.S.C. § 2113(a) and (d)

18 U.S.C. § 2

---

---

A True Bill,

---

Foreperson

---

---

PAUL J. FISHMAN

*U.S. ATTORNEY*

*NEWARK, NEW JERSEY*

---

---

FRANCISCO J. NAVARRO

*ASSISTANT UNITED STATES ATTORNEY*

*(973) 645-2515*

---

---