

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No.
 :
 : 18 U.S.C. § 371
 v. : 18 U.S.C. § 2113(a)
 : 18 U.S.C. § 2113(d)
 : 18 U.S.C. § 2
 ANGEL FELIU :
 :

SUPERSEDING INFORMATION

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 Information:
 - 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 1, 2013, through on or about July 26, 2013, in the District of New Jersey and elsewhere, defendant

ANGEL FELIU

did knowingly and intentionally conspire and agree with G.B., 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 ANGEL FELIU 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 ANGEL FELIU 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 ANGEL FELIU 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 ANGEL FELIU and co-conspirator

G.B. would use and brandish dangerous weapons.

8. It was further a part of the conspiracy that during certain of the robberies, co-conspirator G.B. would use and brandish a firearm.

Overt Acts

9. In furtherance of the conspiracy and to effect its unlawful object, defendant ANGEL FELIU 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, co-conspirator G.B. 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, co-conspirator G.B. and defendant ANGEL FELIU 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 co-conspirator G.B. and defendant ANGEL FELIU when Victim 1 closed the restaurant and appeared to be driving home.

d. On or about July 22, 2013, co-conspirator G.B and defendant ANGEL FELIU 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, co-conspirator G.B. and defendant ANGEL FELIU used an air pistol and a knife to rob TD Bank, located at 410 Fairview Avenue, Fairview, New Jersey, and defendant ANGEL FELIU fled in a car driven by co-conspirator J.C.

f. The proceeds of the conspiracy were shared by defendant ANGEL FELIU, co-conspirator G.B., co-conspirator R.L., co-conspirator J.C., and others.

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

COUNT TWO
(Bank Robbery)

1. The allegations set forth in paragraphs 1(c), 1(e), and 4 through 9 of Count One of this Superseding Information 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

ANGEL FELIU,

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 THREE
(Bank Robbery)

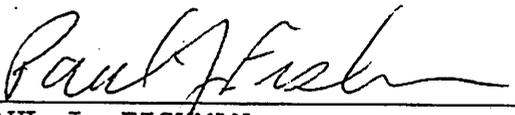
1. The allegations set forth in paragraphs 1(d), 1(e), and 4 through 9 of Count One of this Superseding Information are re-alleged and incorporated herein.

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

ANGEL FELIU,

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.



PAUL J. FISHMAN
United States Attorney

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18 U.S.C. § 371

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18 U.S.C. § 2

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