2015R00038/MTS

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 15 –
v.	:	18 U.S.C. § 371
BRENDA WEBSTER	:	INFORMATION

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

THE DEFENDANT, CO-CONSPIRATORS, AND RELEVANT ENTITIES

1. At all times relevant to this Information:

a. Angie's Bridgeton Grill (hereinafter, the "Diner") was a nearly 75-year-old diner located at 1 ½ East Broad Street in Bridgeton, New Jersey. The Diner was a business that was engaged in interstate commerce and in an activity affecting interstate commerce. In 2012, the Diner was listed on the New Jersey Department of Environmental Protection-Historic Preservation Office's New Jersey and National Register of Historic Places.

b. Defendant BRENDA WEBSTER was a resident of Cedarville, New Jersey and co-owner of the Diner. Defendant BRENDA WEBSTER was also the wife of co-conspirator A.W.

c. A.W., who is named as a co-conspirator but not as a defendant herein, was a resident of Cedarville, New Jersey and was co-owner of the Diner. Co-conspirator A.W. was also the husband of defendant BRENDA WEBSTER.

d. The Farmer's Insurance Company of Flemington (hereinafter, the "Insurance Company") was an insurance company with offices in Flemington, New Jersey that provided a variety of insurance coverages for the Diner.

THE CONSPIRACY

3. On or about October 24, 2012, in Cumberland County, in the District of New Jersey, and elsewhere, the defendant,

BRENDA WEBSTER,

did knowingly and intentionally conspire and agree with A.W. to maliciously damage and destroy, by means of fire, a building, vehicle, or other real or personal property, used in interstate commerce and in any activity affecting interstate commerce, contrary to Title 18, United States Code, Section 844(i).

OBJECT OF THE CONSPIRACY

4. It was the object of the conspiracy to damage or destroy, by means of fire, the Diner, and make a claim on the Insurance Company in order to collect the insurance proceeds from the insurance policies covering the Diner.

MANNER AND MEANS OF THE CONSPIRACY

5. It was part of the conspiracy that defendant BRENDA WEBSTER and A.W. owned and operated the Diner since approximately March 2012.

6. It was further part of the conspiracy that, after several months of poor financial performance, defendant BRENDA WEBSTER and A.W. agreed to set fire to and attempt to destroy, the Diner.

7. It was further part of the conspiracy that, on the evening of October 23, 2012 and the early morning of October 24, 2012, defendant BRENDA WEBSTER and A.W. traveled from their home in Cedarville, New Jersey to the Diner in Bridgeton in A.W.'s truck for the purposes of destroying the Diner by fire.

8. It was further part of the conspiracy that, in the early morning of October 24, 2012, defendant BRENDA WEBSTER and A.W. entered the Diner, collected combustible materials (including newspapers, paper menus, and other light-weight combustible materials), doused the combustible materials with gasoline, and initiated the fire by placing an open flame onto the combustible materials.

9. It was further part of the conspiracy that defendant BRENDA WEBSTER and A.W. then quickly exited the Diner as the fire ignited. When the fire ignited, WEBSTER suffered burns to her body as a result of the ignition of the gasoline vapors within the Diner.

10. It was further part of the conspiracy that, on or about October 24, 2012 or October 25, 2012, co-conspirator A.W contacted the Insurance Company regarding the fire and the destruction of the Diner. A.W., however, never completed the claims process.

OVERT ACTS

11. In furtherance of the conspiracy and to effect its unlawful object, the following overt acts were committed in the District of New Jersey and elsewhere:

a. On or about October 23, 2012 and October 24, 2012, defendant BRENDA WEBSTER and A.W. travelled from their home in Cedarville, New Jersey to the Diner in Bridgeton, New Jersey;

b. On or about October 24, 2012, defendant BRENDA WEBSTER

and A.W. entered the Diner, collected combustible materials, doused them with gasoline, and ignited the gasoline thereby causing the Diner to catch fire and burn; and

c. On or about October 24, 2012, A.W. contacted the Insurance Company regarding the fire and the destruction of the Diner.

In violation of Title 18, United States Code, Section 371.

PAUL J. FISHMAN
United States Attorney