

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

2021 SEP 30 P 1:03

CAROL L. MICHEL
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

BILL OF INFORMATION FOR BANK ROBBERY

UNITED STATES OF AMERICA

*

CRIMINAL NO.

21-117

v.

*

SECTION:

SECT. EMAG. 2

ZACHARY VERDIN

*

VIOLATION: 18 U.S.C. § 2113(a)

*

* * *

The United States Attorney charges that:

COUNT 1

On or about July 19, 2021, in the Eastern District of Louisiana, the defendant, **ZACHARY VERDIN**, did take from the person or presence of another by intimidation, money, namely \$521.00, belonging to and in the care, custody, control, management and possession of Capital One Bank, 1867 Baratavia Boulevard, Marrero, Louisiana, a bank whose deposits are insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

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COUNT 2

On or about July 26, 2021, in the Eastern District of Louisiana, the defendant, **ZACHARY VERDIN**, did take from the person or presence of another by intimidation, money, namely \$1,000.00, belonging to and in the care, custody, control, management and possession of Chase Bank, 1425 North Broad Street, New Orleans, Louisiana, a bank whose deposits are insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

COUNT 3

On or about August 2, 2021, in the Eastern District of Louisiana, the defendant, **ZACHARY VERDIN**, did take from the person or presence of another by intimidation, money, namely \$12,540.00, belonging to and in the care, custody, control, management and possession of Regions Bank, 313 Westbank Expressway, Gretna, Louisiana, a bank whose deposits are insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

NOTICE OF BANK ROBBERY FORFEITURE

1. The allegations of Counts 1, 2, and 3 of this Bill of Information are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 2113 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offenses alleged in Counts 1, 2, and 3, the defendant, **ZACHARY VERDIN**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 2113 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, any and all

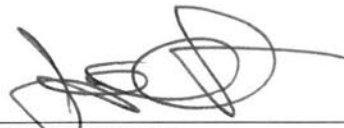
property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 2113.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

DUANE A. EVANS
UNITED STATES ATTORNEY



JON MAESTRI
Assistant United States Attorney
Louisiana Bar Roll No. 24838

New Orleans, Louisiana
September 30, 2021