

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Crim. No. 13-  
 :  
 v. : 18 U.S.C. § 2113 (a)  
 : 18 U.S.C. § 2113 (d)  
 CLAUDE WILLIAMS : 18 U.S.C. § 371 and  
 : 18 U.S.C. § 924 (c)  
 :

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. From in or about September 2011 through in or  
about July 2012, in the District of New Jersey, and elsewhere,  
defendant

CLAUDE WILLIAMS

knowingly and willfully conspired and agreed with others,  
including co-conspirators A.D. and T.W., both charged elsewhere,  
to commit offenses against the United States, namely, to take  
United States currency belonging to and in the care, custody,  
control, management, and possession of bank employees, by force  
and violence, and by intimidation, whose deposits were then  
insured by the Federal Deposit Insurance Corporation and the  
National Credit Union Administration, and in doing so, did  
assault and put in jeopardy the lives of other persons by the

use of a dangerous weapon, namely a firearm, contrary to Title 18, United States Code, Sections 2113(a) and 2113(d).

**MANNER AND MEANS OF THE CONSPIRACY**

2. It was a part of the conspiracy that defendant CLAUDE WILLIAMS, co-conspirator A.D., co-conspirator T.W., and others agreed to rob banks at gunpoint, including the following banks on or about the following dates:

Date	Bank	Location
September 26, 2011	Financial Resources Federal Credit Union	780 Easton Avenue Somerset, NJ
November 21, 2011	Somerset Savings Bank	64 West End Avenue Somerville, NJ
February 27, 2012	Provident Bank	100 Stelton Road Piscataway, NJ
April 17, 2012	Provident Bank	562 Lexington Avenue Clifton, NJ
May 22, 2012	Provident Bank	100 Stelton Road Piscataway, NJ
June 20, 2012	Fulton Bank	700 Middlesex Avenue Metuchen, NJ
July 12, 2012	Unity Bank	1230 Bound Brook Road (Route 28) Middlesex, NJ
July 30, 2012	Unity Bank	450 Somerset Street North Plainfield, NJ

3. It was further part of the conspiracy that defendant CLAUDE WILLIAMS, co-conspirator A.D., co-conspirator T.W., and others drove to the banks.

4. It was further part of the conspiracy that co-conspirator A.D. entered four of the banks prior to the armed robberies to "case" each of those banks.

5. It was further part of the conspiracy that, during the commission of the armed bank robberies, defendant CLAUDE WILLIAMS entered the bank wearing a bandana over his face and brandished a firearm.

6. It was further part of the conspiracy that, during the commission of five of the armed bank robberies, defendant CLAUDE WILLIAMS vaulted the teller counter while brandishing a firearm.

7. It was further part of the conspiracy that defendant CLAUDE WILLIAMS, co-conspirator A.D., and others shared in the proceeds of the armed bank robberies.

#### OVERT ACTS

8. In furtherance of the conspiracy and to effect the objects thereof, the following overt acts, among others, were committed in the District of New Jersey:

a. On or about September 26, 2011, co-conspirator A.D. entered the Financial Resources Federal Credit Union located at 780 Easton Avenue in Somerset, New Jersey, to "case" the bank prior to the robbery.

b. On or about September 26, 2011, defendant CLAUDE WILLIAMS entered and robbed the Financial Resources Federal Credit Union located at 780 Easton Avenue in Somerset,

New Jersey, and, during the course of the bank robbery, defendant CLAUDE WILLIAMS brandished a firearm.

c. On or about November 21, 2011, co-conspirator A.D. entered the Somerset Savings Bank located at 64 West End Avenue in Somerville, New Jersey, to "case" the bank prior to the robbery.

d. On or about November 21, 2011, defendant CLAUDE WILLIAMS entered and robbed the Somerset Savings Bank located at 64 West End Avenue in Somerville, New Jersey, and, during the course of the bank robbery, defendant CLAUDE WILLIAMS brandished a firearm.

e. On or about February 27, 2012, defendant CLAUDE WILLIAMS entered and robbed the Provident Savings Bank located at 100 Stelton Road in Piscataway, New Jersey, and, during the course of the bank robbery, defendant CLAUDE WILLIAMS brandished a firearm.

f. On or about April 16, 2012, co-conspirator A.D. entered the Provident Savings Bank located at 562 Lexington Avenue in Clifton, New Jersey, to "case" the bank prior to the robbery.

g. On or about April 17, 2012, defendant CLAUDE WILLIAMS entered and robbed the Provident Savings Bank located at 562 Lexington Avenue in Clifton, New Jersey, and, during the course of the bank robbery, defendant CLAUDE WILLIAMS brandished a firearm.

h. On or about May 22, 2012, defendant CLAUDE WILLIAMS entered and robbed the Provident Savings Bank located at 100 Stelton Avenue in Piscataway, New Jersey, and, during the course of the bank robbery, defendant CLAUDE WILLIAMS brandished a firearm.

i. On or about June 20, 2012, co-conspirator A.D. entered the Fulton Bank located at 700 Middlesex Avenue in Metuchen, New Jersey, to "case" the bank prior to the robbery.

j. On or about June 20, 2012, defendant CLAUDE WILLIAMS entered and robbed Fulton Bank located at 700 Middlesex Avenue in Metuchen, New Jersey, and, during the course of the bank robbery, defendant CLAUDE WILLIAMS brandished a firearm.

k. On or about July 12, 2012, co-conspirator T.W. entered the Unity Bank located at 1230 Bound Brook Road (Route 28) in Middlesex, New Jersey, to "case" the bank prior to the robbery.

l. On or about July 12, 2012, defendant CLAUDE WILLIAMS entered and robbed the Unity Bank located at 1230 Bound Brook Road (Route 28) in Middlesex, New Jersey, and, during the course of the bank robbery, defendant CLAUDE WILLIAMS brandished a firearm.

m. On or about July 12, 2012, in furtherance of his escape from the Unity Bank, defendant CLAUDE WILLIAMS pointed a firearm at an off-duty police officer who had followed defendant CLAUDE WILLIAMS and co-conspirator T.W. as they were fleeing in the getaway vehicle.

n. On or about July 30, 2012, defendant CLAUDE WILLIAMS and co-conspirator A.D. attempted to rob Unity Bank located at 450 Somerset Street in North Plainfield, New Jersey, and, during the course of the attempted bank robbery, defendant CLAUDE WILLIAMS possessed a firearm.

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

COUNT TWO  
(Bank Robbery)

9. On or about September 26, 2011, in Somerset County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

did knowingly, by force, violence, and intimidation did take from the person and presence of another, approximately \$20,339.00 in United States currency belonging to, and in the care, custody, control, management, and possession of the Financial Resources Federal Credit Union, located in Somerset, New Jersey, whose deposits were then insured by the National Credit Union Administration, and in committing such offense, defendant CLAUDE WILLIAMS did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

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

COUNT THREE

(Use of a Firearm in Furtherance of a Crime of Violence)

10. On or about September 26, 2011, in Somerset County, in the District of New Jersey and elsewhere, defendant,

CLAUDE WILLIAMS

during and in relation to a crime of violence for which defendant CLAUDE WILLIAMS may be prosecuted in a court of the United States, specifically the bank robbery set forth in Count Two, did knowingly use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

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



COUNT FOUR  
(Bank Robbery)

11. On or about November 21, 2011, in Somerset County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

did knowingly, by force, violence, and intimidation did take from the person and presence of another, approximately \$14,691.00 in United States currency belonging to, and in the care, custody, control, management, and possession of the Somerset Savings Bank, located in Somerville, New Jersey, whose deposits were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, defendant CLAUDE WILLIAMS did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

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

COUNT FIVE

(Use of a Firearm in Furtherance of a Crime of Violence)

12. On or about November 21, 2011, in Somerset County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

during and in relation to a crime of violence for which defendant CLAUDE WILLIAMS may be prosecuted in a court of the United States, specifically the bank robbery set forth in Count Four, did knowingly use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

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

COUNT SIX  
(Bank Robbery)

13. On or about February 27, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

did knowingly, by force, violence, and intimidation did take from the person and presence of another, approximately \$43,960.00 in United States currency belonging to, and in the care, custody, control, management, and possession of the Provident Bank, located in Piscataway, New Jersey, whose deposits were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, defendant CLAUDE WILLIAMS did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

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

COUNT SEVEN

(Use of a Firearm in Furtherance of a Crime of Violence)

14. On or about February 27, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

during and in relation to a crime of violence for which defendant CLAUDE WILLIAMS may be prosecuted in a court of the United States, specifically the bank robbery set forth in Count Six, did knowingly use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

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

COUNT EIGHT  
(Bank Robbery)

15. On or about April 17, 2012, in Passaic County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

did knowingly, by force, violence, and intimidation did take from the person and presence of another, approximately \$10,093.00 in United States currency belonging to, and in the care, custody, control, management, and possession of the Provident Bank, located in Clifton, New Jersey, whose deposits were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, defendant CLAUDE WILLIAMS did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

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

COUNT NINE

(Use of a Firearm in Furtherance of a Crime of Violence)

16. On or about April 17, 2012, in Passaic County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

during and in relation to a crime of violence for which defendant CLAUDE WILLIAMS may be prosecuted in a court of the United States, specifically the bank robbery set forth in Count Eight, did knowingly use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

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

COUNT TEN  
(Bank Robbery)

17. On or about May 22, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

did knowingly, by force, violence, and intimidation did take from the person and presence of another, approximately \$13,398.00 in United States currency belonging to, and in the care, custody, control, management, and possession of the Provident Bank, located in Piscataway, New Jersey, whose deposits were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, defendant CLAUDE WILLIAMS did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

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

COUNT ELEVEN

(Use of a Firearm in Furtherance of a Crime of Violence)

18. On or about May 22, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

during and in relation to a crime of violence for which defendant CLAUDE WILLIAMS may be prosecuted in a court of the United States, specifically the bank robbery set forth in Count Ten, did knowingly use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

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



COUNT TWELVE  
(Bank Robbery)

19. On or about June 20, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

did knowingly, by force, violence, and intimidation did take from the person and presence of another, approximately \$6,928.00 in United States currency belonging to, and in the care, custody, control, management, and possession of the Fulton Bank, located in Metuchen, New Jersey, whose deposits were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, defendant CLAUDE WILLIAMS did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

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

COUNT THIRTEEN

(Use of a Firearm in Furtherance of a Crime of Violence)

20. On or about June 20, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

during and in relation to a crime of violence for which defendant CLAUDE WILLIAMS may be prosecuted in a court of the United States, specifically the bank robbery set forth in Count Twelve, did knowingly use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

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

COUNT FOURTEEN  
(Bank Robbery)

21. On or about July 12, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

did knowingly, by force, violence, and intimidation did take from the person and presence of another, approximately \$9,192.00 in United States currency belonging to, and in the care, custody, control, management, and possession of the Unity Bank, located in Middlesex, New Jersey, whose deposits were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, defendant CLAUDE WILLIAMS did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

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

COUNT FIFTEEN

(Use of a Firearm in Furtherance of a Crime of Violence)

22. On or about July 12, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

during and in relation to a crime of violence for which defendant CLAUDE WILLIAMS may be prosecuted in a court of the United States, specifically the bank robbery set forth in Count Fourteen, did knowingly use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

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

COUNT SIXTEEN  
(Attempted Bank Robbery)

23. On or about July 30, 2012, in Somerset County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

did knowingly, by force, violence, and intimidation, attempt to take from the person and presence of another United States currency belonging to, and in the care, custody, control, management, and possession of the Unity Bank, located in North Plainfield, whose deposits were then insured by the Federal Deposit Insurance Corporation.

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

COUNT SEVENTEEN

(Use of a Firearm in Furtherance of a Crime of Violence)

24. On or about July 30, 2012, in Somerset County, in the District of New Jersey and elsewhere, defendant

CLAUDE WILLIAMS

during and in relation to a crime of violence for which defendant CLAUDE WILLIAMS may be prosecuted in a court of the United States, specifically the bank robbery set forth in Count Sixteen, did knowingly use, carry, and, in furtherance of such crime, possess a firearm.

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

A TRUE BILL

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Foreperson



PAUL J. FISHMAN  
United States Attorney

CASE NUMBER:

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United States District Court  
District of New Jersey

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UNITED STATES OF AMERICA

v.

CLAUDE WILLIAMS

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**INDICTMENT FOR**

18 U.S.C. § 2113 (a)

18 U.S.C. § 2113 (d)

18 U.S.C. § 371

18 U.S.C. § 924 (c)

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**PAUL J. FISHMAN**

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