

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 18-
	:	
v.	:	18 U.S.C. § 2113(a)
	:	18 U.S.C. § 1951(a)
JOEL ROBBINS	:	
	:	

I N F O R M A T I O N

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

**Count One**  
(Bank Robbery)

On or about June 6, 2017, in Morris County, in the District of New Jersey and elsewhere, defendant

JOEL ROBBINS

did, by force, violence, and intimidation, knowingly take from the person and presence of employees of the JP Morgan Chase Bank, approximately \$15,000.00 in United States currency belonging to, and in the care, custody, control, management, and possession of the JP Morgan Chase Bank, located in Whippany, New Jersey, whose deposits were then insured by the Federal Deposit Insurance Corporation.

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

**Count Two**  
(Bank Robbery)

On or about July 20, 2017, in Morris County, in the District of  
New Jersey and elsewhere, defendant

JOEL ROBBINS

did, by force, violence, and intimidation, knowingly take from the person and  
presence of employees of the Santander Bank, approximately \$16,538.00 in  
United States currency belonging to, and in the care, custody, control,  
management, and possession of the Santander Bank, located in Parsippany,  
New Jersey, whose deposits were then insured by the Federal Deposit  
Insurance Corporation.

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

**Count Three**  
(Bank Robbery)

On or about October 25, 2017, in Bergen County, in the District of New Jersey and elsewhere, defendant

JOEL ROBBINS

did, by force, violence, and intimidation, knowingly take from the person and presence of employees of the Chase Bank, approximately \$5,000.00 in United States currency belonging to, and in the care, custody, control, management, and possession of the Chase Bank, located in Edgewater, New Jersey, whose deposits were then insured by the Federal Deposit Insurance Corporation.

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

**Count Four**  
(Bank Robbery)

On or about December 3, 2017, in Bergen County, in the District of New Jersey and elsewhere, defendant

JOEL ROBBINS

did, by force, violence, and intimidation, knowingly take from the person and presence of employees of the TD Bank, approximately \$10,665.00 in United States currency belonging to, and in the care, custody, control, management, and possession of the TD Bank, located in Mahwah, New Jersey, whose deposits were then insured by the Federal Deposit Insurance Corporation.

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

**Count Five**  
(Hobbs Act Robbery)

On or about October 15, 2017, in Sussex County, in the District of New Jersey and elsewhere, defendant

JOEL ROBBINS

did knowingly and willfully obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951, and to commit and threaten physical violence to the person and property of another, namely, an employee of a liquor store located in Hopatcong, New Jersey, in furtherance of a plan and purpose to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery.

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

**Count Six**  
(Hobbs Act Robbery)

On or about November 26, 2017, in Morris County, in the District of New Jersey and elsewhere, defendant

JOEL ROBBINS

did knowingly and willfully obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951, and to commit and threaten physical violence to the person and property of another, namely, an employee of a gas station located in Pinebrook, New Jersey, in furtherance of a plan and purpose to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery.

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

**FORFEITURE ALLEGATION AS TO COUNTS ONE THROUGH FOUR**

As the result of committing the offense of bank robbery in violation of 18 U.S.C. § 2113(a), as charged in Counts One through Four of this Information,

JOEL ROBBINS

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the said offenses, and all property traceable thereto.

**FORFEITURE ALLEGATION AS TO COUNTS FIVE AND SIX**

As a result of committing the Hobbs Act robbery offenses alleged in Counts five and six of this Information,

JOEL ROBBINS

shall forfeit to the United States, (i) pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of such offenses, and (ii) pursuant to 18 U.S.C. § 924 and 28 U.S.C. § 2461, any firearms and ammunition involved in or used in the commission of such offenses.

**Substitute Assets Provision**

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- 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 divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

  
CRAIG CARPENITO  
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.**

**JOEL ROBBINS**

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**INFORMATION FOR**

18 U.S.C. § 2113(a)

18 U.S.C. § 1951(a)

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**CRAIG CARPENITO**

*U.S. ATTORNEY*

*NEWARK, NEW JERSEY*

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JASON S. GOULD

*ASSISTANT U.S. ATTORNEY*

*(973) 645-2776*

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