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2019R00532/AER

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MAR 14 2022

AT 8:30 _____ M
WILLIAM T. WALSH
CLERK

UNITED STATES OF AMERICA : Crim. No. 22- 182 (PGS)
:
v. : 18 U.S.C. § 1951(a)
: 18 U.S.C. §§ 1951(a) & 2
OMAR FELICIANO-ESTREMER : 18 U.S.C. § 924(c)(1)(A)(iii)

INFORMATION

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

COUNT ONE
(Hobbs Act Conspiracy)

1. From on or about May 5, 2019, to on or about June 16, 2019, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

OMAR FELICIANO-ESTREMER,

did knowingly and willfully conspire and agree with others to obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in such commerce, by robbery, by means of actual and threatened force, and violence, and fear of injury, immediate or future, to the person and property of another.

OBJECT OF THE CONSPIRACY

2. The object of the conspiracy was to obtain money by robbing employees of convenience stores and other commercial establishments located in or around New Jersey and Pennsylvania of business proceeds and merchandise.

MANNER AND MEANS OF THE CONSPIRACY

3. To further the conspiracy, defendant OMAR FELICIANO-ESTREMER, codefendant Gabriel Lopez, and others engaged in the following conduct:

- a. The armed robbery of Victim Business 1 in Trenton, New Jersey, on May 5, 2019;
- b. The armed robbery of Victim Business 2 in Trenton, New Jersey, on May 8, 2019;
- c. The armed robbery of Victim Business 3 in Hamilton, New Jersey, on May 12, 2019;
- d. The armed robbery of Victim Business 4 in Lawrence Township, New Jersey, on May 13, 2019;
- e. The armed robbery of Victim Business 5 in Rahway, New Jersey, on June 6, 2019, during and in relation to which a firearm was discharged by Lopez;
- f. The armed robbery of Victim Business 6 in Bristol, Pennsylvania, on June 7, 2019;
- g. The armed robbery of Victim Business 7 in Morrisville, Pennsylvania, on June 8, 2019; and
- h. The armed robbery of Victim Business 8 in Hamilton, New Jersey, on June 16, 2019.

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

COUNT TWO
(Hobbs Act Robbery)

On or about June 6, 2019, in Union County, in the District of New Jersey, and elsewhere, the defendant,

OMAR FELICIANO-ESTREMER,

and another individual, did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in such commerce, by robbery, by means of actual and threatened force, and violence, and fear of injury, immediate or future, to the person and property of another, and aided and abetted one another in same,

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

COUNT THREE
(Hobbs Act Robbery)

On or about June 8, 2019, in Bucks County, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

OMAR FELICIANO-ESTREMER,

and another individual, did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in such commerce, by robbery, by means of actual and threatened force, and violence, and fear of injury, immediate or future, to the person and property of another, and aided and abetted one another in same,

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

COUNT FOUR
(Hobbs Act Robbery)

On or about June 16, 2019, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

OMAR FELICIANO-ESTREMER,

and another individual, did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in such commerce, by robbery, by means of actual and threatened force, and violence, and fear of injury, immediate or future, to the person and property of another, and aided and abetted one another in same,

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

COUNT FIVE

(Discharging a Firearm During and in Relation to a Crime of Violence)

On or about June 6, 2019, in Union County, in the District of New Jersey, and elsewhere, the defendant,

OMAR FELICIANO-ESTREMER, A,

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, namely, the Hobbs Act Robbery charged in Count Two of this Information, did knowingly use and carry a firearm, which was discharged, and aided and abetted the same.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(iii) and Section 2.

FORFEITURE ALLEGATION AS TO COUNTS ONE, TWO, THREE, AND FOUR

As a result of committing the Hobbs Act Robbery offenses in violation of 18 U.S.C. § 1951(a), as charged in Counts One, Two, Three, and Four of this Information, the defendant,

OMAR FELICIANO-ESTREMER,

shall forfeit to the United States, 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 offense.

FORFEITURE ALLEGATION AS TO COUNT FIVE

As a result of committing the firearm offense in violation of 18 U.S.C. § 924(c), as charged in Count Five of this Information, the defendant,

OMAR FELICIANO-ESTREMER,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearm and ammunition involved in or used in the commission of such offense.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Allegations)

If any of the above-described forfeitable property, 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 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,

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

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PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: 22-cr- 182 (PGS)

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

OMAR FELICIANO-ESTREMER

INFORMATION FOR
18 U.S.C. §§ 1951(a), 924(c)(1)(A)(iii), & 2

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