

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 17-  
 :  
 v. : 18 U.S.C. § 2113(a)  
 :  
 ROBERT SOMERS :

INFORMATION

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

On or about February 17, 2016, in Passaic County, in the District of New Jersey, defendant

ROBERT SOMERS

did by force, violence, and intimidation, knowingly take from the person and presence of another, namely employees of a TD Bank, located in Passaic County, New Jersey, approximately \$1,360.00 in money belonging to, and in the care, custody, control, management, and possession of the TD Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

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

## FORFEITURE ALLEGATION

1. The allegation contained on Page One of this Indictment is hereby realleged and incorporated by reference for the purpose of noticing forfeitures.

2. As the result of committing the offense of bank robbery in violation of 18 U.S.C. § 2113(a), as charged in this Information, defendant ROBERT SOMERS 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 offense, and all property traceable thereto, including, but not limited to:

a. A sum of money equal to \$900.00 in United States Currency representing the proceeds of the offense charged in this Information, and

b. Approximately \$400 in United States currency, seized on or about February 17, 2016, in that such sum constitutes or is derived, directly or indirectly, from proceeds traceable to the commission of the offense charged in this Information.

### Substitute Assets Provision

3. 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), 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.

  
WILLIAM E. FITZPATRICK  
Acting United States Attorney

**CASE NUMBER: 17-**

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**ROBERT SOMERS**

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**INFORMATION FOR**

18 U.S.C. § 2113(a)

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**WILLIAM E. FITZPATRICK**  
*ACTING UNITED STATES ATTORNEY*  
*NEWARK, NEW JERSEY*

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*JIHEE G. SUH*  
*ASSISTANT U.S. ATTORNEY*  
*(973) 645-2836*

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(Ed. 1/97)