2007R01376/JM

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. _____
	:	
v.	:	18 U.S.C. §§ 371, 2113(a),
	:	2113(d), 924(c)(1)(A)(ii) and
MICHAEL GREEN	:	2
	:	
	:	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 1

1. At all times relevant to this Information:

a. Defendant MICHAEL GREEN (defendant GREEN) was a resident of New Jersey.

b. CardSmart, LLC ("CardSmart") was a retail store located in Garwood, New Jersey. CardSmart sold prepaid telephones and calling cards which it imported from outside the State of New Jersey. As such, CardSmart was a business that engaged in "commerce" as that term is defined in 18 U.S.C. § 1951(b)(3).

c. Speedy Check Cashing was a check-cashing store located in Linden, New Jersey. Speedy Check Cashing sold postage stamps, envelopes and money orders and cashed checks which were imported from outside the State of New Jersey. As such, Speedy

Check Cashing was a business that engaged in "commerce" as that term is defined in 18 U.S.C. § 1951(b)(3).

d. The deposits of Rahway Savings Bank, Wachovia Bank, Unity Bank, Bank of America, Columbia Savings Bank, PNC Bank, and Investors Savings Bank were insured by the Federal Deposit Insurance Corporation.

2. From in or about November 2006 to on or about November 10, 2007, in Middlesex County, in the District of New Jersey, and elsewhere, defendant

MICHAEL GREEN

did knowingly and willfully conspire with R.R., a co-conspirator not named as a defendant herein, and others, to commit an offense against the United States, that is:

a. to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery and to commit or threaten physical violence to any person in furtherance of such plan, contrary to Title 18, United States Code, Section 1951(a); and

b. to take, by force and violence, and by intimidation, from the person and presence of another, money belonging to, and in the care, custody, control, management, and possession of banks, the deposits of such banks which were then insured by the Federal Deposit Insurance Corporation, and in committing each of these bank robberies, to assault a person and put in jeopardy the

life of a person by the use of a dangerous weapon, to wit, a handgun, contrary to Title 18, United States Code, Sections 2113(a) and 2113(d).

OBJECT OF THE CONSPIRACY

3. The object of the conspiracy was to commit robberies of banks, businesses, and employees of businesses.

MANNER AND MEANS

4. It was part of the conspiracy that, at various times, defendant GREEN, R.R., two other co-conspirators not named as defendants herein, CC-1 and CC-2, and others, would plan to rob banks, businesses and employees of businesses.

5. It was a further part of the conspiracy that the co-conspirators would conduct surveillance of employees of businesses and identified employees of businesses that would be carrying currency with them.

6. It was a further part of the conspiracy that, in order to intimidate bank employees into turning over monies in the possession of the banks, defendant GREEN and R.R. would brandish weapons during bank robberies.

7. It was a further part of the conspiracy that, during certain of the bank robberies, R.R., while brandishing a weapon, groped female bank employees.

OVERT ACTS

8. In furtherance of the conspiracy and to effect its

unlawful object, defendant GREEN and R.R. and others committed, and caused to be committed, the following overt acts in the District of New Jersey and elsewhere:

Hobbs Act Robbery - CardSmart, November 27, 2006

a. On or about November 27, 2006, defendant GREEN and R.R. conducted surveillance of the parking lot of the Commerce Bank, located at 465 South Avenue in Cranford, New Jersey, in order to locate a courier who worked for CardSmart ("Victim 1").

b. On or about November 27, 2006, CC-2 notified defendant GREEN and R.R. when Victim 1 drove into the parking lot of Commerce Bank.

c. On or about November 27, 2006, Victim 1 exited his vehicle holding a bag that contained U.S. currency and checks which were the proceeds of CardSmart's business operations. R.R. thereafter approached Victim 1, hit him repeatedly in the head and face with a closed fist, grabbed the bag and the monies contained therein, and fled with defendant GREEN.

Hobbs Act Robbery - Speedy Check Cashing, December 27, 2006

d. On or about December 27, 2006, defendant GREEN and R.R. conducted surveillance of Speedy Check Cashing, located at 401 E. Edgar Road in Linden, New Jersey.

e. On or about December 27, 2006, defendant GREEN and R.R. followed behind two employees of Speedy Check Cashing

("Victim 2" and "Victim 3") when they arrived at the store. Victim 2 carried with him/her a blue knapsack containing approximately $2,000 in cash, and assorted checks totaling approximately $30,000, both of which were the proceeds of Speedy Check Cashing's business operations.

f. On or about December 27, 2006, R.R. approached Victim 2, brandished a handgun and took the blue knapsack and the monies contained therein.

g. On or about December 27, 2006, defendant GREEN and R.R. fled the scene, taking with them the blue knapsack and the monies contained therein.

Bank Robbery #1 - Rahway Savings Bank, January 10, 2007

h. On or about January 10, 2007, defendant GREEN and R.R. drove to the Rahway Savings Bank in Rahway, New Jersey.

i. On or about January 10, 2007, defendant GREEN entered the Rahway Savings Bank, brandished a handgun and demanded money from the tellers.

j. On or about January 10, 2007, after taking approximately $10,532 from tellers at Rahway Savings Bank, defendant GREEN and R.R. fled from the bank in a stolen 2003 Mercedes Benz E-500.

Bank Robbery #2 - Wachovia Bank, February 8, 2007

k. On or about February 8, 2007, defendant GREEN and R.R. entered the Wachovia Bank in Colonia, New Jersey,

brandished handguns and demanded money from the tellers.

l. On or about February 8, 2007, after taking approximately $11,978 from tellers at Wachovia Bank, defendant GREEN and R.R. fled the Wachovia Bank.

Bank Robbery #3 - Unity Bank, March 10, 2007

m. On or about March 10, 2007, defendant GREEN and R.R. entered the Unity Bank in Colonia, New Jersey, brandished handguns and demanded money from the tellers.

n. On or about March 10, 2007, after taking approximately $12,158 from tellers at Unity Bank, defendant GREEN and R.R. fled the Unity Bank.

Bank Robbery #4 - Unity Bank, April 24, 2007

o. On or about April 24, 2007, defendant GREEN entered the Unity Bank in Colonia, New Jersey, brandished a handgun and demanded money from the tellers.

p. On or about April 24, 2007, after taking approximately $17,652 from tellers at Unity Bank, defendant GREEN fled the Unity Bank.

q. On or about April 24, 2007, defendant GREEN gave a portion of the $17,652 to R.R. for safekeeping.

Bank Robbery #5 - Bank of America, June 25, 2007

r. On or about June 25, 2007, R.R. entered the Bank of America in Iselin, New Jersey, brandished a handgun and demanded money from the tellers.

s. On or about June 25, 2007, after taking approximately $7,588 from tellers at Bank of America, R.R. fled the bank and met up with defendant GREEN, who drove them to R.R.'s house.

Bank Robbery #6 - Columbia Savings Bank, July 20, 2007

t. On or about July 20, 2007, defendant GREEN and R.R. entered the Columbia Savings Bank in Edison, New Jersey, brandished handguns and demanded money from the tellers.

u. On or about July 20, 2007, after taking approximately $19,460 from tellers at Columbia Savings Bank, defendant GREEN and R.R. fled the bank.

Bank Robbery #7 - PNC Bank, September 4, 2007

v. On or about September 4, 2007, defendant GREEN and R.R. entered the PNC Bank in Fords, New Jersey, brandished handguns and demanded money from the tellers.

w. On or about September 4, 2007, after taking approximately $59,518 from tellers at PNC Bank, defendant GREEN and R.R. fled the bank.

Bank Robbery #8 - Wachovia Bank, September 15, 2007

x. On or about September 15, 2007, defendant GREEN and R.R. entered the Wachovia Bank in Metuchen, New Jersey, brandished handguns and demanded money from the tellers.

y. On or about September 15, 2007, after taking approximately $8,189 from tellers at Wachovia Bank, defendant

GREEN and R.R. fled the bank.

Bank Robbery #9 - PNC Bank, September 25, 2007

z. On or about September 25, 2007, defendant GREEN and R.R. entered PNC Bank in East Brunswick, New Jersey, brandished handguns and demanded money from the tellers.

aa. On or about September 25, 2007, after taking approximately $16,449 from tellers at PNC Bank, defendant GREEN and R.R. fled the bank.

Bank Robbery #10 - Bank of America, October 12, 2007

bb. On or about October 12, 2007, defendant GREEN and R.R. entered the Bank of America in Edison, New Jersey, brandished handguns and demanded money from the tellers.

cc. On or about October 12, 2007, after taking approximately $24,033 as well as traveler's checks and gift cards from tellers at Bank of America, defendant GREEN and R.R. fled the bank.

Bank Robbery #11 - Investors Savings Bank, November 10, 2007

dd. On or about November 10, 2007, defendant GREEN and R.R. entered the Investors Savings Bank in Piscataway, New Jersey, brandished handguns and demanded money from the tellers.

ee. On or about November 10, 2007, after taking approximately $93,595 from tellers at Investors Savings Bank, defendant GREEN and R.R. fled the bank driving a silver Audi

which had been previously reported stolen in Paterson, New Jersey.

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

COUNT 2

On or about November 10, 2007, at Piscataway, in Middlesex County, in the District of New Jersey, and elsewhere, defendant

MICHAEL GREEN

did knowingly, by force and violence, and by intimidation, take from the person and presence of employees of Investors Savings Bank approximately $93,595 belonging to and in the care, custody, control, management, and possession of that bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing this bank robbery did put in jeopardy the life of a person by the use of a dangerous weapon, to wit, a handgun.

In violation of Title 18, United States Code, Section 2113(a), Section 2113(d) and Section 2.

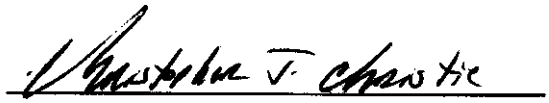
COUNT 3

On or about November 10, 2007, at Piscataway, in Middlesex County, in the District of New Jersey, and elsewhere, defendant

MICHAEL GREEN

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the robbery of Investors Savings Bank in Piscataway, New Jersey as charged in Count 2 of this Information, did knowingly and willfully use, carry, and possess a firearm, and in furtherance of such crime, did brandish a firearm.

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



CHRISTOPHER J. CHRISTIE
United States Attorney