

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 17-
 :
 : 18 U.S.C. § 1951(a)
 v. : 18 U.S.C. §§ 2119(2) and 2
 : 18 U.S.C. §§ 1201(a) and 2
 JOSTIN REYES :

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
(Conspiracy to Commit Hobbs Act Robbery)

On or about December 25, 2015, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

JOSTIN REYES,

did knowingly and willfully conspire and agree with others, known and unknown, to 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 bar located in Hawthorne, 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 TWO
(Carjacking)

On or about December 26, 2015, in Passaic and Bergen Counties, in the District of New Jersey, and elsewhere, the defendant,

JUSTIN REYES,

did knowingly with the intent to cause death and serious bodily harm, take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce, namely a 2008 Dodge Caravan, from the person and presence of another, namely, the driver of the 2008 Dodge Caravan, by force and violence and by intimidation, which resulted in serious bodily injury.

In violation of Title 18, United States Code, Sections 2119(2) and 2.


COUNT THREE
(Kidnapping)

On or about December 26, 2015, in the District of New Jersey and elsewhere, the defendant,

JOSTIN REYES,

did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away another person, namely the driver of the 2008 Dodge Caravan, and, in furtherance thereof, did willfully transport such person in interstate commerce, namely from New Jersey to New York.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.


WILLIAM E. FITZPATRICK
ACTING UNITED STATES ATTORNEY

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UNITED STATES OF AMERICA

v.

JOSTIN REYES

INFORMATION FOR

18 U.S.C. § 1951
18 U.S.C. §§ 2119(2) and 2
18 U.S.C. §§ 1201 and 2

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