

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Madeline Cox Arleo
	:	Crim. No.
v.	:	
	:	18 U.S.C. § 1951(a)
WENDELL BRADLEY, JR.	:	18 U.S.C. § 2119(1)
	:	18 U.S.C. § 924(c)(1)(A)(ii)

INFORMATION

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

COUNT 1
(Conspiracy to Commit Hobbs Act Robbery)

Relevant Individuals and Entities

1. At all times relevant to this Information, the following gas stations ordered and sold goods that moved in and affected interstate commerce and engaged in an industry that affected interstate commerce.

a. Gas Station-1 was a gas station in North Bergen, New Jersey. Victim-1 was a clerk at Gas Station-1.

b. Gas Station-2 was a gas station in Jersey City, New Jersey. Victim-2 was a clerk at Gas Station-2.

c. Gas Station-3 was a gas station in Hillside, New Jersey. Victim-3 was a clerk at Gas Station-3.

d. Gas Station-4 was a gas station in Jersey City, New Jersey. Victim-4 was a clerk at Gas Station-4.

e. Gas Station-5 was a gas station in Union, New Jersey. Victim-5 was a clerk at Gas Station-5.

f. Gas Station-6 was a gas station in Jersey City, New Jersey. Victim-6 was a clerk at Gas Station-6.

g. Gas Station-7 was a gas station in Secaucus, New Jersey. Victim-7 was a clerk at Gas Station-7.

2. From on or about January 2, 2022 to on or about February 4, 2022, in Hudson, Union, and Essex Counties, in the District of New Jersey, and elsewhere, the defendant,

WENDELL BRADLEY, JR.,

did knowingly and willfully conspire and agree with others, known and unknown, to obstruct, delay, and affect commerce and the movement of articles and commodities in such commerce by robbery and by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of another, namely Victim-1 through Victim-7.

3. The goal of the conspiracy was to obtain money by robbing employees of gas stations described in Paragraph 1 of this Information of business proceeds.

4. It was part of the conspiracy that:

a. BRADLEY, either alone or with a co-conspirator, would drive to one of the gas stations described in Paragraph 1 of this Information and ask the clerk to put gas in the car's gas tank.

b. While the clerk was filling the gas tank, BRADLEY, a co-conspirator, or both would brandish one or more firearms and demand money from the clerk.

c. After taking, or attempting to take, money from the clerk, BRADLEY would flee in the car he arrived in.

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

COUNT 2
(Hobbs Act Robbery)

5. The allegations set forth in Paragraph 1 of this Information are incorporated here by reference.

6. On or about February 4, 2022, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

WENDELL BRADLEY, JR.,

did knowingly and willfully obstruct, delay, and affect, and attempt 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 such commerce, by robbery, in that the defendant did unlawfully take and obtain property by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of another, namely, Victim-7, an employee of Gas Station-7.

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

COUNT 3
(Attempted Carjacking)

7. On or about February 4, 2022, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

WENDELL BRADLEY, JR.,

attempted to take a motor vehicle, a white Dodge Durango, that had been transported, shipped, and received in interstate or foreign commerce from Victim-8, by force, violence, and intimidation, with the intent to cause death and serious bodily harm.

In violation of Title 18, United States Code, Section 2119(1).

COUNT 4
**(Brandishing a Firearm During and
in Relation to a Crime of Violence)**

8. On or about February 4, 2022, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

WENDELL BRADLEY, JR.,

in furtherance of a crime of violence for which the defendant may be prosecuted in a court of the United States, namely, Hobbs Act Robbery, did knowingly brandish a firearm, namely, a black Ruger LCR .38 caliber revolver.

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

FORFEITURE ALLEGATION AS TO COUNTS 1 AND 2

9. Upon conviction of one or both of the offenses in violation of Title 18, United States Code, Section 1951(a) charged in Counts 1 and 2 of this Information, the defendant, WENDELL BRADLEY, JR., shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all property, real and personal, that constitutes or is derived from proceeds the defendant obtained directly or indirectly as a result of such offense(s).

FORFEITURE ALLEGATION AS TO COUNT 3

10. Upon conviction of the offense in violation of Title 18, United States Code, Section 2119(1) charged in Count 3 of this Information, the defendant, WENDELL BRADLEY, JR., shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(5), all property, real and personal, that represents or is traceable to gross proceeds the defendant obtained directly or indirectly as a result of such offense.

FORFEITURE ALLEGATION AS TO COUNT 4

11. Upon conviction of the offense in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii) charged in Count 4 of this Information, the defendant, WENDELL BRADLEY, JR., shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the commission of that

offense, including a black Ruger LCR .38 caliber revolver, bearing serial number 545-82664; and 4 rounds of .38 caliber ammunition.

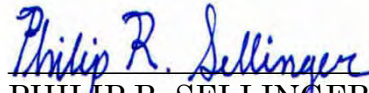
SUBSTITUTE ASSETS PROVISION

(Counts 1, 2, and 3)

12. 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 Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.


PHILIP R. SELLINGER
United States Attorney