

United States District Court
FOR THE
NORTHERN DISTRICT OF CALIFORNIA
VENUE: SAN FRANCISCO

FILED
AUG 26 2008
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
V.

E-filing **CR 08 0574 MHP**

ANGELICA SAGOTE, SEFO SAGOTE,
and ELISARA TAITO,

DEFENDANT(S).

INDICTMENT

VIOLATIONS:

18 U.S.C. §§ 2113(a) and (d) - Attempted Armed Bank Robbery;
18 U.S.C. §§ 2113(a) and (d) - Armed Bank Robbery; and
18 U.S.C. § 2 - Aiding and Abetting; and 18 U.S.C. § 371 -
Conspiracy

A true bill.

[Signature]
Foreman

Filed in open court this 26th day of

Aug. 2008
[Signature] KAREN L. HOM
Clerk

~~JOSEPH C. SPINA~~
~~UNITED STATES MAGISTRATE JUDGE~~

Bail, \$ 10,000

CR 08-574 MHP

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT SUPERSEDING

OFFENSE CHARGED

- 18 U.S.C. §§ 2113(a) and (d) & 2 - Attempted Armed Bank Robbery and Aiding and Abetting;
18 U.S.C. §§ 2113(a) and (d) & 2- Armed Bank Robber and Aiding and Abetting; and
18 U.S.C. § 371 - Conspiracy
 Petty
 Minor
 Misdemeanor
 Felony

PENALTY: SEE ATTACHED PENALTY SHEET

E-filing

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DISTRICT COURT

DEFENDANT - U.S.

ANGELICA SAGOTE

DISTRICT COURT NUMBER

CR 08

0574

DEFENDANT

IS NOT IN CUSTODY

- Has not been arrested, pending outcome this proceeding.
1) If not detained give date any prior summons was served on above charges
2) Is a Fugitive
3) Is on Bail or Release from (show District)

NDCA

IS IN CUSTODY

- 4) On this charge
5) On another conviction } Federal State
6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

If "Yes" give date filed

DATE OF ARREST 8/6/08

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI, Special Agent Brian Guy

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

08-70524 BZ

Name and Office of Person

Furnishing Information on this form AUSA Nat Cousins

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

AUSA Nat Cousins

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount:

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: 8/27 9:30 a.m. Before Judge: Spero

Comments:

AO 257 (Rev. 6/78)

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- 18 U.S.C. §§ 2113(a) and (d) & 2 - Attempted Armed Bank Robbery and Aiding and Abetting; Petty
- 18 U.S.C. §§ 2113(a) and (d) & 2 - Armed Bank Robbery and Aiding and Abetting; Minor
- 18 U.S.C. § 371 -- Conspiracy Misdemeanor
- Felony

PENALTY: SEE ATTACHED PENALTY SHEET

E-filing

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DEFENDANT - U.S.

SEFO SAGOTE

DISTRICT COURT NUMBER

MHP

08 0574

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- 18 U.S.C. §§ 2113(a) and (d) & 2 - Attempted Armed Bank Robbery and Aiding and Abetting; Petty
- 18 U.S.C. §§ 2113(a) and (d) & 2 - Armed Bank Robbery and Aiding and Abetting; Minor
- 18 U.S.C. § 371 - Conspiracy; Misdemeanor
- Felony

PENALTY: SEE ATTACHED PENALTY SHEET

E-filing

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

▶ ELISARA TAITO

DISTRICT COURT NUMBER

CR 08

0574

MHP

DEFENDANT

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- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction } Federal State
 - 6) Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

} If "Yes" give date filed

DATE OF ARREST ▶

Month/Day/Year
8/6/08

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶

Month/Day/Year

This report amends AO 257 previously submitted

PROCEEDING

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Defendant Address:

Date/Time: 8/27 9:30 a.m.

Before Judge: Spero

Comments:

PENALTY SHEET ATTACHMENT

For each defendant,

Maximum penalty as to Counts One and Two [Class B Felonies]:

25 years imprisonment; \$250,000 fine; 5 years supervised release; \$100 special assessment per count; and restitution

Maximum penalty as to Count Three [Class D Felony]:

5 years imprisonment; \$250,000 fine; 3 years supervised release; \$100 special assessment; and restitution

PENALTIES MAY BE CONSECUTIVE

1 JOSEPH P. RUSSONIELLO (CABN 44332)
2 United States Attorney

FILED
AUG 26 2008
RICHARD W. WIEKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

E-filing

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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ANGELICA SAGOTE, SEFO SAGOTE,
15 and ELISARA TAITO,
16 Defendants.

No. 08

0574

MHP

VIOLATIONS:
18 U.S.C. §§ 2113(a) and (d) –
Attempted Armed Bank Robbery;
18 U.S.C. §§ 2113(a) and (d) – Armed
Bank Robbery;
18 U.S.C. § 2 – Aiding and Abetting;
and 18 U.S.C. § 371 – Conspiracy

SAN FRANCISCO VENUE

17 INDICTMENT

18 The Grand Jury charges:

19 COUNT ONE: (18 U.S.C. §§ 2113(a) and (d) & 2 – Attempted Armed Bank Robbery,
20 and Aiding and Abetting Attempted Armed Bank Robbery)

21 1. On or about August 4, 2008, in the Northern District of California, the
22 defendants,

23 ANGELICA SAGOTE, SEFO SAGOTE, and ELISARA TAITO,
24 did knowingly and by force and violence, and by intimidation, attempt to take away from
25 the persons and presence of employees of the Pacific Postal Credit Union located at 175
26 Mendell Street, San Francisco, California, money, property, and things of value belonging
27 to and in the care, custody, control, management and possession of Pacific Postal Credit
28

INDICTMENT

1 Union, the deposits of which were then insured by the National Credit Union
2 Administration Board (NCUA), and in attempting to and committing the offense charged
3 in this paragraph, the defendants assaulted and put in jeopardy the lives of employees and
4 customers of the Pacific Postal Credit Union, by use of a dangerous weapon, in violation
5 of Title 18, United States Code, Sections 2113(a) & (d) and Title 18, United States Code,
6 Section 2.

7 COUNT TWO: (18 U.S.C. §§ 2113(a) and (d) & 2 – Armed Bank Robbery and Aiding
8 and Abetting Armed Bank Robbery)

9 2. On or about August 6, 2008, in the Northern District of California, the
10 defendants,

11 ANGELICA SAGOTE, SEFO SAGOTE, and ELISARA TAITO,
12 did knowingly and by force and violence, and by intimidation, take away from the persons
13 and presence of employees of the Pacific Postal Credit Union, located at 175 Mendell
14 Street, San Francisco, California, approximately \$76,300 in United States currency
15 belonging to and in the care, custody, control, management and possession of Pacific
16 Postal Credit Union, the deposits of which were then insured by the National Credit
17 Union Administration Board (NCUA), and in committing the offense charged in this
18 paragraph, the defendants assaulted and put in jeopardy the lives of employees and
19 customers of the Pacific Postal Credit Union, by use of a dangerous weapon, in violation
20 of Title 18, United States Code, Sections 2113(a) & (d) and Title 18, United States Code,
21 Section 2.

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INDICTMENT

1 COUNT THREE: (18 U.S.C. § 371 – Conspiracy to Commit Armed Bank Robbery)

2 3. Beginning at a time unknown to the Grand Jury, but no later than on or
3 about August 4, 2008, and continuing to approximately August 6, 2008, in the Northern
4 District of California, the defendants,

5 ANGELICA SAGOTE, SEFO SAGOTE, and ELISARA TAITO,
6 did knowingly combine, conspire, and agree with at least one other person to commit an
7 offense against the United States, that is, to take away from the persons and presence of
8 employees of the Pacific Postal Credit Union located at 175 Mendell Street, San
9 Francisco, California, money, property, and things of value belonging to and in the care,
10 custody, control, management and possession of Pacific Postal Credit Union, the deposits
11 of which were then insured by the National Credit Union Administration Board (NCUA),
12 in violation of Title 18, United States Code, Sections 2113(a) & (d) and Title 18, United
13 States Code, Section 2.

14 OVERT ACTS

15 a. In furtherance of the conspiracy, on or about August 4, 2008, defendants
16 ANGELICA SAGOTE, SEFO SAGOTE, and ELISARA TAITO, attempted to rob the
17 Pacific Postal Credit Union, as set forth in Paragraph One. ANGELICA SAGOTE drove
18 SEFO SAGOTE and ELISARA TAITO to the Pacific Postal Credit Union. SEFO
19 SAGOTE and ELISARA TAITO entered the Pacific Postal Credit Union with weapons
20 drawn, ordered customers and employees to the floor, and said they would start shooting
21 if the tellers did not open the doors.

22 b. In furtherance of the conspiracy, on or about August 6, 2008, defendants
23 ANGELICA SAGOTE, SEFO SAGOTE, and ELISARA TAITO, committed an armed
24 bank robbery of the Pacific Postal Credit Union, as set forth in Paragraph Two.
25 ANGELICA SAGOTE drove SEFO SAGOTE and ELISARA TAITO to the Pacific
26 Postal Credit Union. SEFO SAGOTE and ELISARA TAITO forced tellers to open

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INDICTMENT

1 the front doors of the credit union. Once inside, SEFO SAGOTE and ELISARA TAITO
2 pushed the tellers behind the teller counter and directly to the vault room.

3 All in violation of 18 U.S.C. § 371.

4
5 DATED: August 26, 2008

A TRUE BILL.

6 *Angela...*
7 FOREPERSON

8 JOSEPH P. RUSSONIELLO
9 United States Attorney

10 *Kyle F. Waldinger*
11 KYLE WALDINGER
12 Deputy Chief, Major Crimes Section

13 (Approved as to form: *N. Cousins*
14 AUSA N. COUSINS

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INDICTMENT