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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **SUPERSEDING**  
 : **CRIMINAL COMPLAINT**  
 v. :  
 : **Mag. No. 12-4075**  
 CLAUDE WILLIAMS, :  
 ANDREA DORSEY, and :  
 TERESA WEBB :

I, Michael A. Scimeca, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

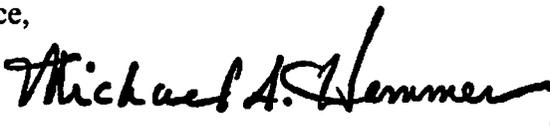
Continued on the attached page and made a part hereof.

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Special Agent Michael A. Scimeca  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
July 30, 2012 in Newark, New Jersey

HONORABLE MICHAEL A. HAMMER  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer



## ATTACHMENT A

### **Count One – Bank Robbery** **(Defendants Williams and Dorsey)**

On or about September 26, 2011, in Somerset County, in the District of New Jersey and elsewhere, defendants, CLAUDE WILLIAMS and ANDREA DORSEY, by force, violence, and intimidation did take from the person and presence of another, approximately \$20,339.00 in money belonging to, and in the care, custody, control, management, and possession of the Financial Resources Federal Credit Union, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, defendants, CLAUDE WILLIAMS and ANDREA DORSEY, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

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

### **Count Two – Use of a Firearm in Furtherance of a Crime of Violence** **(Defendant Williams)**

On or about September 26, 2011, in Somerset County, in the District of New Jersey and elsewhere, defendant, CLAUDE WILLIAMS, during and in relation to a crime of violence for which defendant, CLAUDE WILLIAMS, may be prosecuted in a court of the United States, specifically the bank robbery set forth in Count One, did knowingly and willfully use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

### **Count Three – Bank Robbery** **(Defendant Williams)**

On or about November 21, 2011, in Somerset County, in the District of New Jersey and elsewhere, defendant, CLAUDE WILLIAMS, by force, violence, and intimidation did take from the person and presence of another, approximately \$14,691.00 in money belonging to, and in the care, custody, control, management, and possession of Somerset Savings Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, defendant, CLAUDE WILLIAMS, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

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

**Count Four – Bank Robbery**  
**(Defendant Williams)**

On or about February 27, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendant, CLAUDE WILLIAMS, by force, violence, and intimidation did take from the person and presence of another, approximately \$43,960.00 in money belonging to, and in the care, custody, control, management, and possession of Provident Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, defendant, CLAUDE WILLIAMS, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

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

**Count Five – Bank Robbery**  
**(Defendant Williams)**

On or about April 17, 2012, in Passaic County, in the District of New Jersey and elsewhere, defendant, CLAUDE WILLIAMS, by force, violence, and intimidation did take from the person and presence of another, approximately \$10,093.00 in money belonging to, and in the care, custody, control, management, and possession of Provident Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, defendant, CLAUDE WILLIAMS, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

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

**Count Six – Bank Robbery**  
**(Defendant Williams)**

On or about June 20, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendant, CLAUDE WILLIAMS, by force, violence, and intimidation did take from the person and presence of another, approximately \$6,928 in money belonging to, and in the care, custody, control, management, and possession of Fulton Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, defendant, CLAUDE WILLIAMS, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

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

**Count Seven – Bank Robbery**  
**(Defendants Williams and Webb)**

On or about July 12, 2012, in Middlesex County, in the District of New Jersey and elsewhere, defendants, CLAUDE WILLIAMS and TERESA WEBB, by force, violence, and intimidation did take from the person and presence of another, approximately \$9,192.00 in money belonging to, and in the care, custody, control, management, and possession of Unity Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and

in committing such offense, defendants, CLAUDE WILLIAMS and TERESA WEBB, did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

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

**Count Eight – Use of a Firearm in Furtherance of a Crime of Violence**

On or about July 12, 2012, in Somerset County, in the District of New Jersey and elsewhere, defendant, CLAUDE WILLIAMS, during and in relation to a crime of violence for which defendant, CLAUDE WILLIAMS, may be prosecuted in a court of the United States, specifically the bank robbery set forth in Count Seven, did knowingly and willfully use, carry, and, in furtherance of such crime, possess a firearm, which was brandished.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

## ATTACHMENT B

I, Michael A. Scimeca, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about September 26, 2011, at approximately 9:46 a.m., Financial Resources Federal Credit Union (the "Credit Union")—a bank in Franklin Township, New Jersey, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC")—was robbed. Bank employees later provided statements to law enforcement. According to a bank employee, shortly before the robbery commenced, a black female with a large tattoo on the left side of her neck walked into the Credit Union, but the female did not appear to be interested in conducting any bank business. After the female left, an older black male entered the bank. He was armed with a handgun and wearing a bandana, a hooded sweat shirt or jacket, and white gloves. The male vaulted the counter and, while waving his gun, demanded that bank employees give him their money. Following the robbery, surveillance video shows, the male got into the passenger side of a vehicle. The loss sustained was approximately \$20,339.00.

2. On or about November 21, 2011, at approximately 9:49 a.m., Somerset Savings Bank, an FDIC-insured bank in Somerville, New Jersey, was robbed. After the robbery, bank employees provided statements to law enforcement. Bank employees stated that an older black male entered the bank. The male was armed with a handgun and wearing a bandana, a hooded sweat shirt, and white gloves. He vaulted the counter and, while waving his gun, demanded that bank employees give him money. After he left the bank, the male removed his bandana and hood, and a bank employee observed that he was bald and had facial hair. The male fled the bank with approximately \$14,691.00.

3. On or about February 27, 2012, at approximately 9:30 a.m., Provident Bank, an FDIC-insured bank located in Piscataway, New Jersey, was robbed. After the robbery, bank employees provided statements to law enforcement. Bank employees stated that an older black male entered the bank while armed with a handgun and wearing a bandana, a hooded sweat shirt, and white gloves. Once inside the bank, the male vaulted the counter, and he took approximately \$43,963.00 from bank employees.

4. On or about April 17, 2012, at approximately 11:00 a.m., Provident Bank, an FDIC-insured bank located in Clifton, New Jersey, was robbed. After the robbery, bank employees provided statements to law enforcement. According to bank employees, the robber was a black male armed with a handgun and wearing a bandana, a hooded sweat shirt, and white gloves. The male vaulted the counter, demanded that bank employees give him money, and fled the bank with approximately \$10,093.00. Surveillance video shows that a black Dodge Magnum with tinted windows and custom wheels was in the vicinity of the bank around the time of the robbery.

5. The previous month, on or about March 21, 2012, a Dodge Magnum was purportedly purchased by, and registered in the name of N.D., a relative of ANDREA DORSEY. On or about June 28, 2012, and on or about July 20, 2012, among other days, law enforcement observed a black Dodge Magnum with tinted windows and custom wheels parked near a residence associated with ANDREA DORSEY.

6. On June 20, 2012, at approximately 11:17 a.m., Fulton Bank, an FDIC-insured bank located in Metuchen, New Jersey, was robbed. Bank employees later provided statements to law enforcement. Bank employees described the robber as a black male armed with a handgun and wearing a bandana, a hooded sweat shirt, and white gloves. After demanding that bank employees give him money, the male fled the bank with approximately \$6,928. Surveillance video shows that a Volkswagen Passat station-wagon was in the vicinity of the bank around the time of the robbery.

7. Previously, on or about October 14, 2011—less than three weeks after the Credit Union bank robbery—a Volkswagen Passat station-wagon, bearing New Jersey license plate E80BLW, was purportedly purchased by, and registered in the name of, N.D.2, another relative of ANDREA DORSEY (the “Volkswagen Passat”).

8. On July 12, 2012, at approximately 11:55 a.m., Unity Bank, an FDIC-insured bank located in Middlesex, New Jersey, was robbed. Surveillance video from the bank appears to show TERESA WEBB walk into the bank at approximately 9:44 a.m. and, again, at 11:30 a.m. Each time, TERESA WEBB left the bank without conducting any transactions. At approximately 11:55 a.m., surveillance video shows that a black male—armed with a handgun and wearing a bandana, a hooded sweat shirt or jacket, and gloves—entered the bank. After demanding that bank employees give him money, the male fled the bank with approximately \$9,192.

9. Prior to July 12, 2012 robbery, an unarmed off-duty police officer (the “Officer”) was parked across from the Unity Bank. The Officer observed a black male, wearing a face covering and a hooded sweat shirt or jacket, enter the Unity Bank. Thereafter, the Officer observed the suspect leave the Unity Bank and get into the rear of a green Ford Taurus bearing New Jersey license plate X91BVR (the “Ford Taurus”). After getting into the Ford Taurus, which was being driven by a female, the suspect crouched down so as not to be visible to observers.

10. The Officer then followed the Ford Taurus, which, after a period of time, attempted to elude her. After the unsuccessful attempt to elude the Officer, the Ford Taurus stopped. The male—whom the Officer later described as an older black male with a shaved head and facial hair—exited the rear of the car and pointed his gun at the Officer.

11. CLAUDE WILLIAMS owns and regularly uses the Ford Taurus. Several days after the July 12, 2012 robbery, the Ford Taurus was seen parked outside CLAUDE WILLIAMS’s residence in Elizabeth, New Jersey, and he was later observed driving it. Nevertheless, CLAUDE WILLIAMS had the Ford Taurus falsely registered in the name of another individual.

12. CLAUDE WILLIAMS's age and appearance are consistent with the Officer's description of the individual whom she observed point a gun at her and with descriptions of the bank robber given by witnesses to the bank robberies.

13. Within minutes of the September 26, 2011 bank robbery, CLAUDE WILLIAMS's cell phone received an incoming call from ANDREA DORSEY's cell phone. As a result of that call, both CLAUDE WILLIAMS's cell phone and ANDREA DORSEY's cell phones connected to phone towers in the vicinity of the Credit Union. Approximately thirty minutes after the robbery, CLAUDE WILLIAMS's cell phone connected to a phone tower between the Credit Union and his residence.

14. ANDREA DORSEY has a large tattoo on the left side of her neck. ANDREA DORSEY's age and appearance—including the large tattoo—are consistent with bank employees' description of the black female who cased the bank prior to the September 26, 2011 bank robbery. Further, surveillance video from the bank appears to show that ANDREA DORSEY walked into the Credit Union shortly before the robbery but left without conducting any transactions.

15. Approximately thirty minutes before the November 21, 2011 robbery, CLAUDE WILLIAMS's cell phone connected to the phone tower closest to the Somerset Savings Bank. Approximately thirty minutes after the robbery, CLAUDE WILLIAMS's cell phone connected to a phone tower between the Somerset Savings Bank and his residence.

16. Approximately an hour before the February 27, 2012 robbery, CLAUDE WILLIAMS's cell phone connected to a phone tower in the vicinity of the Provident Bank. About twelve minutes after the robbery, CLAUDE WILLIAMS's cell phone connected to a phone tower between the Provident Bank and his residence.

17. Approximately six minutes before the July 12, 2012 robbery, CLAUDE WILLIAMS's cell phone connected to a phone tower in the vicinity of the Unity Bank.

18. On or about July 27, 2012, CLAUDE WILLIAMS, while driving the Ford Taurus, was surveiling a Unity Bank branch located in Somerset, New Jersey. On or about July 28, 2012, CLAUDE WILLIAMS parked the Ford Taurus near the Unity Bank. A black female entered the bank and left without conducting any transactions. A black female was later observed inside the Ford Taurus.

19. On or about July 30, 2012, TERESA WEBB was observed driving WILLIAMS's Ford Taurus and then arrested by law enforcement. At the same time, CLAUDE WILLIAMS and ANDREA DORSEY were observed driving the Volkswagen Passat in the vicinity of the Unity Bank. Law enforcement stopped the Volkswagen Passat and arrested CLAUDE WILLIAMS and ANDREA DORSEY.

20. CLAUDE WILLIAMS was wearing a bandana, and inside the Volkswagen Passat law enforcement found a handgun, white gloves and a bag.