

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
DOMINIQUE JOHNSON	:	VIOLATIONS:
JERRY TAYLOR	:	18 U.S.C. § 371 (conspiracy to commit
AMIN DANCY	:	armed bank robbery - 2 counts)
CHRISTOPHER MONTAGUE	:	18 U.S.C. § 2113(d) (armed bank
	:	robbery - 5 counts)
	:	18 U.S.C. § 924(c)(1) (using and carrying
	:	a firearm during and in relation to a
	:	crime of violence - 3 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

SECOND SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this second superseding indictment:

1. The deposits of each of the following banks, located in the Eastern District of Pennsylvania, were insured by the Federal Deposit Insurance Corporation:

- a. Wachovia Bank, located at 6420 Frankford Avenue in Philadelphia;
- b. Wachovia Bank, located at 762 Bristol Pike in Bensalem; and
- c. TD Bank, located at 2200 Garrett Road in Upper Darby.

2. From in or about May 2009, through on or about July 17, 2009, in the Eastern District of Pennsylvania, defendants

**DOMINIQUE JOHNSON and
JERRY TAYLOR**

conspired and agreed, together and with others known and unknown to the grand jury, to commit

armed bank robberies of the banks listed in paragraph 1, in violation of Title 18, United States Code, Section 2113(d).

MANNER AND MEANS

It was part of the conspiracy that:

3. Defendants DOMINIQUE JOHNSON and JERRY TAYLOR, and Tiniesha Johnson and Gregory Lawrence, both charged elsewhere, agreed to rob banks at gunpoint, including one or more of the following banks, located in the Eastern District of Pennsylvania, on or about the following dates:

<u>Date</u>	<u>Bank</u>	<u>Location</u>
May 29, 2009	Wachovia Bank	6420 Frankford Avenue, Philadelphia
July 3, 2009	Wachovia Bank	762 Bristol Pike, Bensalem
July 17, 2009	TD Bank	2200 Garrett Road, Upper Darby

4. During the commission of two of the bank robberies, defendants DOMINIQUE JOHNSON and JERRY TAYLOR, and Gregory Lawrence, brandished a semi-automatic handgun, and in one bank robbery Lawrence brandished what appeared to be a semi-automatic handgun.

5. Defendants DOMINIQUE JOHNSON and JERRY TAYLOR, and Gregory Lawrence, agreed to carry out alternate roles as to who would enter the bank and who would act as a “look-out,” while the other entered the bank and robbed it.

6. Tiniesha Johnson agreed to act as a getaway driver for two armed bank robberies.

7. Defendants DOMINIQUE JOHNSON and JERRY TAYLOR, and Tiniesha Johnson and Gregory Lawrence, agreed to split up the proceeds of the bank robberies.

OVERT ACTS

In furtherance of the conspiracy and to accomplish the object of the conspiracy, defendants DOMINIQUE JOHNSON and JERRY TAYLOR, and Tiniesha Johnson and Gregory Lawrence, and others unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

The May 29, 2009 Gunpoint Robbery of The Wachovia Bank in Philadelphia, PA

In or about May of 2009:

1. Defendant DOMINIQUE JOHNSON met with Gregory Lawrence to discuss robbing banks. Defendant JOHNSON explained how he had previously robbed a bank earlier in May of 2009 and how he had entered the bank during that first bank robbery and how he had jumped the counter. Defendant JOHNSON and Lawrence also agreed that Lawrence would enter the bank for the May 29, 2009 bank robbery and defendant JOHNSON would be the getaway driver.

2. Gregory Lawrence also discussed the planned May 29, 2009 bank robbery with defendant JERRY TAYLOR and TAYLOR agreed to act as a look-out for Lawrence.

On or about May 29, 2009:

3. Defendant DOMINIQUE JOHNSON drove defendant JERRY TAYLOR and Lawrence in the getaway vehicle to the Wachovia Bank, located at 6420 Frankford Avenue in Philadelphia.

4. Defendant DOMINIQUE JOHNSON parked the getaway vehicle near the bank and waited for Gregory Lawrence to rob the bank.

5. Defendant JERRY TAYLOR acted as a look-out, checking to make sure that there were not any police in the area of the Wachovia Bank.

6. Gregory Lawrence entered the Wachovia Bank, located at 6420 Frankford Avenue in Philadelphia, brandished what appeared to be a semiautomatic firearm, jumped the counter, and demanded money. At gunpoint, bank employees filled the bag brought into the bank by Lawrence with approximately \$30,953 in United States currency and a “dye” pack. Lawrence fled the bank and got into the waiting getaway vehicle driven by defendant DOMINIQUE JOHNSON.

7. Defendants DOMINIQUE JOHNSON and JERRY TAYLOR, and Gregory Lawrence, later divided the proceeds of the robbery among themselves.

The July 3, 2009 Gunpoint Robbery of The Wachovia Bank in Bensalem, PA

8. In or about June 2009, defendant DOMINIQUE JOHNSON and Gregory Lawrence combined funds to purchase a .40 caliber semi-automatic firearm to use in future robberies.

9. In or about July 2009, defendant DOMINIQUE JOHNSON provided defendant JERRY TAYLOR with a .40 caliber semi-automatic firearm to use in the next planned bank robberies.

10. In or about July 2009, defendant DOMINIQUE JOHNSON asked his sister, Tiniesha Johnson, to act as a getaway driver in the next bank robbery.

On or about July 3, 2009:

11. Defendant DOMINIQUE JOHNSON and Gregory Lawrence drove around the area of the Wachovia Bank, located at 762 Bristol Pike in Bensalem, and acted as look-outs, checking to make sure that there were not any police in the area of the bank.

12. Tiniesha Johnson drove defendant JERRY TAYLOR to the vicinity of the Wachovia Bank, and waited for defendant TAYLOR to rob the bank.

13. Defendant JERRY TAYLOR entered the Wachovia Bank, brandished a .40 caliber semiautomatic firearm, jumped the counter, and demanded money. At gunpoint, bank employees filled the bag brought into the bank by defendant TAYLOR with approximately \$9,997 in United States currency.

14. Defendant JERRY TAYLOR fled the bank and got in the getaway vehicle driven by Tiniesha Johnson.

15. Defendant JERRY TAYLOR and Tiniesha Johnson met later with defendant DOMINIQUE JOHNSON and Gregory Lawrence and they divided the stolen proceeds from the bank robbery.

The July 17, 2009 Gunpoint Robbery of The TD Bank in Upper Darby, PA

On or about July 17, 2009:

16. Defendant DOMINIQUE JOHNSON and Gregory Lawrence drove around the area of the TD Bank, located at 2200 Garrett Road in Upper Darby, and acted as look-outs, checking to make sure that there were not any police were in the area of the bank.

17. Tiniesha Johnson drove defendant JERRY TAYLOR to the vicinity of the TD Bank and waited for him to rob the bank.

18. Defendant JERRY TAYLOR entered the TD Bank, brandished a .40 caliber semiautomatic firearm, jumped the counter, and demanded money. At gunpoint, bank employees filled the bag brought into the bank by defendant TAYLOR with approximately \$8,113 in United States currency and a “dye” pack.

19. Defendant TAYLOR fled the bank and got in the getaway car, a Buick Park Avenue, driven by Tiniesha Johnson.

20. Defendant JERRY TAYLOR and Tiniesha Johnson met later with defendant DOMINIQUE JOHNSON and Gregory Lawrence and discarded the “dye” pack.

21. Defendants JERRY TAYLOR and DOMINIQUE JOHNSON, and Tiniesha Johnson and Gregory Lawrence, later divided the stolen proceeds from the bank robbery.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 7, 2009, in East Greenville, Upper Hanover Township, in the Eastern District of Pennsylvania, defendant

DOMINIQUE JOHNSON

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Wachovia Bank, 628 Gravel Pike, Upper Hanover, Pennsylvania, lawful currency of the United States, that is, approximately \$12,339, belonging to, and in the care, custody, control, management, and possession of the Wachovia Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, and in so doing, defendant JOHNSON knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Wachovia Bank, by use of a dangerous weapon, that is, a firearm.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 1.a. and Overt Acts 1 through 7 of Count One of this second superseding indictment are incorporated here.
2. On or about May 29, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**DOMINIQUE JOHNSON and
JERRY TAYLOR**

and Gregory Lawrence, charged elsewhere, knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of the Wachovia Bank, 6420 Frankford Avenue, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$30,953, belonging to, and in the care, custody, control, management, and possession of the Wachovia Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, and in so doing, Gregory Lawrence and defendants JOHNSON and TAYLOR knowingly and unlawfully assaulted and put in jeopardy, and aided and abetted the same, the lives of the employees of the Wachovia Bank, by use of a dangerous weapon, that is, a firearm.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 1.b. and Overt Acts 8 through 15 of Count One of this second superseding indictment are incorporated here.
2. On or about July 3, 2009, in Bensalem, in the Eastern District of Pennsylvania, defendants

**DOMINIQUE JOHNSON and
JERRY TAYLOR,**

and Tiniesha Johnson and Gregory Lawrence, charged elsewhere, knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of the Wachovia Bank, 762 Bristol Pike, Bensalem, Pennsylvania, lawful currency of the United States, that is, approximately \$9,997, belonging to, and in the care, custody, control, management, and possession of the Wachovia Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, and in so doing, defendants TAYLOR and JOHNSON, and Tiniesha Johnson and Gregory Lawrence, knowingly and unlawfully assaulted and put in jeopardy, and aided and abetted the same, the lives of the employees of the Wachovia Bank, by use of a dangerous weapon, that is, a firearm.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 1.b. and Overt Acts 8 through 15 of Count One of this second superseding indictment are incorporated here.
2. On or about July 3, 2009, in Bensalem, in the Eastern District of Pennsylvania, defendants

**DOMINIQUE JOHNSON and
JERRY TAYLOR**

and Gregory Lawrence, charged elsewhere, knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a .40 caliber semi-automatic pistol, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit armed bank robbery, in violation of Title 18, United States Code, Section 371, and armed bank robbery, in violation of Title 18, United States Code, Sections 2113(d) and 2.

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 1.c. and Overt Acts 16 through 21 of Count One of this second superseding indictment are incorporated here.
2. On or about July 17, 2009, in Upper Darby, in the Eastern District of Pennsylvania, defendants

**DOMINIQUE JOHNSON and
JERRY TAYLOR,**

and Tiniesha Johnson and Gregory Lawrence, charged elsewhere, knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of the TD Bank, 2200 Garrett Road, Upper Darby, Pennsylvania, lawful currency of the United States, that is, approximately \$8,113, belonging to, and in the care, custody, control, management, and possession of the TD Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, and in so doing, defendants JOHNSON and TAYLOR, and Tiniesha Johnson and Gregory Lawrence, knowingly and unlawfully assaulted and put in jeopardy, and aided and abetted the same, the lives of the employees of the TD Bank, by use of a dangerous weapon, that is, a firearm.

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

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 1.c. and Overt Acts 16 through 21 of Count One of this second superseding indictment are incorporated here.

On or about July 17, 2009, in Upper Darby, in the Eastern District of Pennsylvania,

defendants

**DOMINIQUE JOHNSON and
JERRY TAYLOR,**

and Gregory Lawrence, charged elsewhere, used and carried, and aided and abetted the use and carrying of, a firearm, that is, a .40 caliber semi-automatic pistol, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit armed bank robbery, in violation of Title 18, United States Code, Section 371, and armed bank robbery, in violation of Title 18, United States Code, Sections 2113(d) and 2.

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

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this second superseding indictment, the deposits of the Wachovia Bank, 628 Gravel Pike, Upper Hanover, Pennsylvania, were insured by the Federal Deposit Insurance Corporation.

2. On or about July 31, 2009, in East Greenville, Upper Hanover Township, in the Eastern District of Pennsylvania, defendants

**DOMINIQUE JOHNSON,
AMIN DANCY, and
CHRISTOPHER MONTAGUE**

knowingly and intentionally conspired and agreed, together to commit an armed bank robbery of the Wachovia Bank, located at 628 Gravel Pike in East Greenville, Upper Hanover, Pennsylvania, (the Wachovia Bank) in violation of Title 18, United States Code, Sections 2113(d) and 2.

MANNER AND MEANS

It was part of the conspiracy that:

3. Defendants DOMINIQUE JOHNSON, AMIN DANCY, and CHRISTOPHER MONTAGUE agreed to rob the Wachovia Bank at gunpoint.

4. Defendants DOMINIQUE JOHNSON, AMIN DANCY, and CHRISTOPHER MONTAGUE agreed about the roles each of them would carry out during the robbery, including who would scope out the bank in advance of the bank robbery, who would enter the bank, and who would acted as a “look-out” while the other entered the bank and robbed it.

5. Defendant CHRISTOPHER MONTAGUE agreed to enter the bank in advance of the armed bank robbery and to see if there was a security guard at the bank.

6. Defendant AMIN DANCY agreed to enter the bank and rob the bank employees at gunpoint.

7. Defendants DOMINIQUE JOHNSON and CHRISTOPHER MONTAGUE agreed to act as lookouts for defendant AMIN DANCY while DANCY entered the bank and robbed it at gunpoint.

8. During the commission of the bank robbery, defendant AMIN DANCY brandished a semi-automatic handgun.

9. Defendants DOMINIQUE JOHNSON, AMIN DANCY, and CHRISTOPHER MONTAGUE agreed to split up the proceeds of the bank robbery.

OVERT ACTS

In furtherance of the conspiracy and to accomplish the object of the conspiracy, defendants DOMINIQUE JOHNSON, AMIN DANCY, and CHRISTOPHER MONTAGUE committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

On or about July 31, 2009:

1. Defendants DOMINIQUE JOHNSON, AMIN DANCY, and CHRISTOPHER MONTAGUE met to discuss robbing a bank.

2. Under the guise of conducting legitimate banking business, defendant CHRISTOPHER MONTAGUE entered the Wachovia Bank to see if there were any security guards or other impediments to robbing the bank.

3. Defendants DOMINIQUE JOHNSON and CHRISTOPHER MONTAGUE drove in a getaway vehicle to the Wachovia Bank and parked nearby.

4. Defendant AMIN DANCY drove a vehicle to the Wachovia Bank.

5. Defendant AMIN DANCY entered the bank brandishing a .40 caliber semi-automatic handgun, jumped the counter, and demanded money at gunpoint from the bank employees who filled the bag brought into the bank by defendant DANCY with approximately \$10,975 in United States currency.

6. During the robbery, defendants DOMINIQUE JOHNSON and CHRISTOPHER MONTAGUE remained in the parked getaway vehicle and acted as look-outs, checking to make sure that there were not any police in the area of the Wachovia Bank near the bank.

7. After robbing the Wachovia Bank at gunpoint, defendant AMIN DANCY fled the bank and got into the vehicle he drove to the bank and fled the area.

8. Defendant AMIN DANCY met up with defendants DOMINIQUE JOHNSON and CHRISTOPHER LAWRENCE at a nearby location, where defendant DANCY abandoned the vehicle he had used to drive to the bank, got into defendant's JOHNSON's vehicle, and all three defendants fled the area.

9. Defendants DOMINIQUE JOHNSON, AMIN DANCY, and CHRISTOPHER MONTAGUE later divided the proceeds of the robbery among themselves.

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

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 through 9, and Overt Acts 1 through 9 of Count Eight
of

this second superseding indictment are incorporated here.

2. On or about July 31, 2009, in East Greenville, Upper Hanover Township,
the Eastern District of Pennsylvania, defendants

**DOMINIQUE JOHNSON,
AMIN DANCY, and
CHRISTOPHER MONTAGUE**

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Wachovia Bank, 628 Gravel Pike, East Greenville, Upper Hanover Township, Pennsylvania, lawful currency of the United States, that is, approximately \$10,975, belonging to, and in the care, custody, control, management, and possession of the Wachovia Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, and in so doing, defendants DANCY, JOHNSON, and LAWRENCE knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Wachovia Bank, by use of a dangerous weapon, that is, a firearm.

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

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, and 2 through 9, and Overt Acts 1 through 9 of Count Eight of this second superseding indictment are incorporated here.
2. On or about July 31, 2009, in East Greenville, Upper Hanover Township, the Eastern District of Pennsylvania, defendants

**DOMINIQUE JOHNSON and
AMIN DANCY**

used and carried, and aided and abetted the use and carrying of, a firearm, that is, a .40 caliber semi-automatic pistol, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit armed bank robbery, in violation of Title 18, United States Code, Section 371, and armed bank robbery, in violation of Title 18, United States Code, Sections 2113(d) and 2.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Section 924(c), set forth in this second superseding indictment, defendants

**DOMINIQUE JOHNSON,
JERRY TAYLOR,
AMIN DANCY, and
CHRISTOPHER MONTAGUE**

shall forfeit to the United States of America the firearm involved in the commission of these offenses, including, but not limited to, a semi automatic pistol.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

MICHAEL L. LEVY
United States Attorney