

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
 :
 v. : Crim. No. 13-
 :
 JOSE DOMINGUEZ : 18 U.S.C. §§ 215(a)(2),
 : 982(a)(2)(A)
 :

INFORMATION

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

COUNT 1
BANK BRIBERY

1. At all times relevant to this Information:

a. Defendant JOSE DOMINGUEZ (defendant "DOMINGUEZ"), was an employee of Spencer Savings Bank, SLA ("SSB") located in Elmwood Park, New Jersey, and elsewhere, and served as a loan officer.

b. SSB was a financial institution as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation.

2. From in or about August 2003 to in or about December 2003, in the District of New Jersey and elsewhere, defendant

JOSE DOMINGUEZ,
as an officer, employee and agent of a financial institution, did knowingly and corruptly solicit and demand for the benefit of himself, and corruptly accept and agree to accept, things of

value exceeding \$1,000 from D.W., specifically a series of corrupt payments totaling approximately \$55,529.57, intending to be influenced and rewarded in connection with a business and transaction of such institution.

In violation of Title 18, United States Code, Section 215(a)(2).

FORFEITURE ALLEGATION

As a result of committing the aforementioned offense in violation of Title 18, United States Code, Section 215(a)(2), as alleged in the Information, defendant DOMINGUEZ shall forfeit to the United States pursuant to 18 U.S.C. § 982(a)(2)(A) and 28 U.S.C. § 2461, all property, real and personal, that constituted and was derived from proceeds that defendant Dominguez obtained directly and indirectly as a result of the offense, including, but not limited to, approximately \$55,529.57 in United States currency, in that such sum constituted and was derived from proceeds traceable to the commission of bank bribery, in violation of Title 18, United States Code, Section 215(a)(2).

If any of the above-described property, as a result of any act or omission of defendant DOMINGUEZ:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendant DOMINGUEZ up to the value of the above forfeitable property.

In violation of Title 18, United States Code, Section 982(a)(2)(A).


PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 13-_____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

JOSE DOMINGUEZ

INFORMATION FOR

18 U.S.C. § 215(a)(2)

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