
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Michael A. Hammer
v. : Mag. No. 17-4039
ANDRES DOMINGUEZ :
: **CRIMINAL COMPLAINT**


I, Jaden Lowry, 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.


Special Agent Jaden Lowry
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
January 13, 2017 in New Jersey

HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Bank Robbery)

On or about January 12, 2017, in Bergen County, in the District of New Jersey and elsewhere, the defendant

ANDRES DOMINGUEZ

did, by force and violence, and by intimidation, knowingly take from the person and presence of another, namely, employees of the Bank of New Jersey, located in Fort Lee, New Jersey, approximately \$44,525 in money belonging to, and in the care, custody, control, management, and possession, of the Bank of New Jersey, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

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

ATTACHMENT B

I, Jaden Lowry, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth in this Complaint based on my own investigation, my conversation with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related here, they are related in substance and part. Since 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 January 12, 2017, at approximately 3:00 p.m., a male entered the Bank of New Jersey at 1365 Palisade Avenue in Fort Lee, New Jersey (the "Bank").

2. The individual was familiar to witnesses within the Bank as a frequent customer of the Bank whom several of the witnesses had encountered on numerous occasions. The witnesses identified the individual as defendant Andres Dominguez ("DOMINGUEZ").

3. According to witnesses and confirmed by video surveillance footage, defendant DOMINGUEZ was wearing a gray Nike hooded sweatshirt, a blue rubber glove on his left hand, sunglasses, a wool hat, black Adidas pants, and white sneakers.

4. Defendant DOMINGUEZ approached one of the tellers with a large kitchen knife in his right hand and jumped onto the counter separating the tellers from customers. He then verbally demanded money from the teller and instructed the teller, in sum and substance, to give him all the money in the teller drawers. Defendant DOMINGUEZ threatened the teller's life if she failed to comply.

5. Defendant DOMINGUEZ then jumped behind the counter, and three tellers reached into their money drawers, collected cash, and handed it to defendant DOMINGUEZ, who stashed it in a blue bag, jumped back over the counter, and fled the Bank on foot.

6. When law enforcement later searched the area around the Bank for evidence of the bank robbery, they recovered a large kitchen knife from a dumpster behind the bank. They also found two blue rubber gloves, a gray Nike hoodie, and a dark wool hat on the street at various locations within a few blocks of the Bank.

7. In total, defendant DOMINGUEZ obtained approximately \$44,525 from the Bank. At all times relevant to this Complaint, the deposits of the Bank identified above were insured by the Federal Deposit Insurance Corporation.