
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. James B. Clark, III
 :
 v. : Mag. No. 17-3053
 :
 BILLY LE : **CRIMINAL COMPLAINT**

I, Sean Lynch, 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.

Sean Lynch, Special Agent
Federal Bureau of Investigation

April 26, 2017 at
Date

Essex County, New Jersey
County and State

Honorable James B. Clark, III
United States Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Bank Robbery)

On or about April 25, 2017, in Hudson County, in the District of New Jersey, and elsewhere, defendant

BILLY LE

did knowingly, by force and violence, or by intimidation, take and attempt to take from the person and presence of another, namely, employees of the Wells Fargo Bank, located in Jersey City, New Jersey, money belonging to, and in the care, custody, control, management, and possession of, Wells Fargo Bank, 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, Sean Lynch, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with 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 in part. Because this Affidavit 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 April 25, 2017, at approximately 3:56 p.m., a person (the "Robber") wearing a black gas mask, and holding a black duffle bag in one hand and a long metal rod with a red tip in the other hand, entered a Wells Fargo Bank located in Jersey City, New Jersey (the "Wells Fargo Bank"). The Robber held up the duffle bag and waived the metal rod towards a bank teller ("Victim-1"), yelling, in sum and substance, "Give me your money. Give me all your money." A different bank employee ("Victim-2") immediately called the police.

2. Victim-1 backed away from the teller's counter, and the Robber, wielding the metal rod, climbed onto the counter and stated, in sum and substance, "I'm going to fuck you up." A bank customer (the "Customer") approached the Robber from behind, pulled him off the counter, and brought him to the ground. The Customer held the Robber on the ground until law enforcement officers arrived minutes later.

3. Law enforcement officers arrested the Robber at the scene and identified him as BILLY LE ("LE"). Incident to LE's arrest, law enforcement recovered the duffle bag and the metal rod, which appeared to law enforcement to be a pipe bomb. Law enforcement evacuated the bank, after which Emergency Service Unit officers examined the device and determined that it was not an explosive. The duffle bag contained, among other things, a large knife.

4. At all times relevant to this criminal complaint, the deposits of the Wells Fargo Bank was insured by the Federal Deposit Insurance Corporation.