

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Criminal No. 17-
	:	
v.	:	18 U.S.C. § 2113(a)
	:	
ANDRES DOMINGUEZ	:	
	:	

I N F O R M A T I O N

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

**Count One**  
(Bank Robbery)

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

ANDRES DOMINGUEZ

did, by force, violence, and intimidation, knowingly take from the person and presence of employees of the Bank of New Jersey located in Fort Lee, New Jersey, approximately \$44,525.00 in United States currency belonging to, and in the care, custody, control, management, and possession of the Bank of New Jersey, whose deposits were then insured by the Federal Deposit Insurance Corporation.

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

## FORFEITURE ALLEGATION

1. The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. As the result of committing the offense of bank robbery in violation of 18 U.S.C. § 2113(a), as charged in this Information, defendant ANDRES DOMINGUEZ shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the said offense, and all property traceable thereto, including, but not limited to a sum of money equal to \$44,525.00 in United States Currency representing the proceeds of the offense charged in this Information.

3. If by any act or omission of the defendant, any of the property subject to forfeiture described in paragraph 2 herein:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty; the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as

incorporated by Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

  
WILLIAM E. FITZPATRICK  
Acting United States Attorney

CASE NUMBER: \_\_\_\_\_

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

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**UNITED STATES OF AMERICA**

**v.**

**ANDRES DOMINGUEZ**

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**INFORMATION FOR**

18 U.S.C. § 2113(a)

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**WILLIAM E. FITZPATRICK**

*ACTING U.S. ATTORNEY*

*NEWARK, NEW JERSEY*

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JASON S. GOULD

*ASSISTANT U.S. ATTORNEY*

*(973) 645-2776*

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