
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
v. : Mag No. 13-4071 (MAH)
JORGE RODRIGUEZ :

I, Taylor M. Biggs, 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

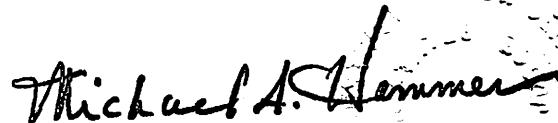
Continued on the attached page and made a part hereof:



Special Agent Taylor M. Biggs
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
April 24, 2013 in Essex County, New Jersey

HONORABLE MICHAEL A. HAMMER
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

Bank Robbery

On or about April 19, 2013, in Bergen County, in the District of New Jersey and elsewhere, defendant, JORGE RODRIGUEZ, knowingly, by force, violence, and by intimidation did take from the person and presence of employees of TD Bank, approximately \$1,980.00 in money belonging to, and in the care, custody, control, management, and possession of TD 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) and Section 2.

ATTACHMENT B

I, Taylor M. Biggs, 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 other 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 part. Because 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 April 19, 2013, at approximately 11:29 a.m., TD Bank, located at 200 Floral Lane, Saddle Brook, New Jersey, was robbed. According to witnesses and the surveillance video from TD Bank, the bank robber was a male of medium build; he wore a white cap, sunglasses, a black hooded sweatshirt, blue jeans, and white sneakers. He appeared to have a mustache, a patch of hair beneath his bottom lip, and dreadlocks. He brandished what appeared to be a black handgun, and carried a paper shopping bag.

2. The robber approached the customer counter and began to shout in order to get the attention of a nearby teller. As the teller approached the customer counter, the teller noticed that the robber was waving what appeared to be a handgun over the counter. The robber handed the teller a paper shopping bag, and instructed the teller to put money into the bag by saying, in substance and in part, give me the money or I'll shoot, you have two seconds. The teller complied, and also included with the money a dye pack and bait bill. The robber then fled TD Bank with the money in the paper shopping bag.

3. Shortly after the robbery, as the robber was walking away from TD Bank, the dye pack exploded. A red cloud could be seen emerging from the paper shopping bag that the robber was carrying.

4. Following the robbery, the robber was observed walking from TD Bank towards a residential home on a nearby street. Law enforcement set up a police perimeter around the residential location where the robber was believed to be hiding. At approximately 4:00 p.m. on that same day, April 19, 2013, an individual later identified as JORGE RODRIGUEZ emerged from the home carrying a Macy's shopping bag. Police apprehended JORGE RODRIGUEZ and secured the bag.

5. Inside the bag was, among other things, a white cap, a wool hat with a dreadlock wig attached to it, another paper shopping bag, cash with red dye on it, a Powerline BB pistol loaded with BBs and an air cartridge, also with red dye on it, and a dye pack.

6. At all times relevant to this Complaint, the deposits of TD Bank were insured by the Federal Deposit Insurance Corporation.