
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

ANDREW THOMAS and
JENNIFER PINTO

: Hon. Joseph A. Dickson
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:
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Mag No. 13-6704

CRIMINAL COMPLAINT


I, Jason Carley, 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 Jason Carley
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
September 12, 2013 in Essex County, New Jersey

HONORABLE JOSEPH A. DICKSON
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Bank Robbery)

On or about November 20, 2012, in Essex County, in the District of New Jersey and elsewhere, defendant

ANDREW THOMAS

did knowingly, by force, violence, and by intimidation, take from the person and presence of employees of the Wells Fargo Bank approximately \$9,000 in money belonging to, and in the care, custody, control, management, and possession of the 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), and Title 18, United States Code, Section 2.

COUNT TWO
(Bank Robbery)

On or about January 10, 2013, in Middlesex County, in the District of New Jersey and elsewhere, defendant

ANDREW THOMAS

did knowingly, by force, violence, and by intimidation, take from the person and presence of employees of the Investors Savings Bank approximately \$7,789.50 in money belonging to, and in the care, custody, control, management, and possession of the Investors Savings 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 Title 18, United States Code, Section 2.

COUNT THREE
(Bank Robbery)

On or about May 3, 2013, in Union County, in the District of New Jersey and elsewhere,
defendant

ANDREW THOMAS

did knowingly, by force, violence, and by intimidation, take from the person and presence of employees of the Investors Savings Bank approximately \$7,836 in money belonging to, and in the care, custody, control, management, and possession of the Investors Savings 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 Title 18, United States Code, Section 2.

COUNT FOUR
(Bank Robbery)

On or about May 30, 2013, in Middlesex County, in the District of New Jersey and elsewhere, defendant

ANDREW THOMAS

knowingly, by force, violence, and by intimidation did take from the person and presence of employees of the Garden State Community Bank approximately \$1,576 in money belonging to, and in the care, custody, control, management, and possession of the Garden State Community 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 Title 18, United States Code, Section 2.

COUNT FIVE
(Bank Robbery)

On or about June 6, 2013, in Somerset County, in the District of New Jersey and elsewhere,
defendant

ANDREW THOMAS

did knowingly, by force, violence, and by intimidation, take from the person and presence of employees of the JP Morgan Chase Bank approximately \$11,266 in money belonging to, and in the care, custody, control, management, and possession of the JP Morgan Chase 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 Title 18, United States Code, Section 2.

COUNT SIX
(Conspiracy to Commit Bank Robbery)

On or about June 6, 2013, in Somerset County, in the District of New Jersey and elsewhere,
defendants

ANDREW THOMAS, and
JENNIFER PINTO

did knowingly and intentionally conspire and agree with each other to commit an offense against the United States, namely, knowingly, by force, violence, and by intimidation taking from the person and presence of employees of the JP Morgan Chase Bank approximately \$11,266 in money belonging to, and in the care, custody, control, management, and possession of the JP Morgan Chase Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, contrary to Title 18, United States Code, Section 2113(a).

In furtherance of the conspiracy and to effect its unlawful purpose, the above-listed defendants committed and caused to be committed overt acts in the District of New Jersey and elsewhere, as set forth in Attachment B below.

In violation of Title 18, United States Code, Section 371.

COUNT SEVEN
(Bank Robbery)

On or about July 30, 2013, in Essex County, in the District of New Jersey and elsewhere,
defendant

ANDREW THOMAS

did knowingly, by force, violence, and by intimidation, attempt to take from the person and presence of employees of the Wells Fargo Bank money belonging to, and in the care, custody, control, management, and possession of the 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), and Title 18, United States Code, Section 2.

COUNT EIGHT
(Bank Robbery)

On or about August 10, 2013, in Union County, in the District of New Jersey and elsewhere,
defendant

ANDREW THOMAS

did knowingly, by force, violence, and by intimidation, take from the person and presence of employees of the Garden State Community Bank approximately \$9,988 in money belonging to, and in the care, custody, control, management, and possession of the Garden State Community 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 Title 18, United States Code, Section 2.

COUNT NINE
(Conspiracy to Commit Bank Robbery)

On or about August 10, 2013, in Union County, in the District of New Jersey and elsewhere,
defendants

ANDREW THOMAS, and
JENNIFER PINTO

did knowingly and intentionally conspire and agree with each other to commit an offense against the United States, namely, knowingly, by force, violence, and by intimidation taking from the person and presence of employees of the Garden State Community Bank approximately \$9,988 in money in money belonging to, and in the care, custody, control, management, and possession of the Garden State Community Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, contrary to Title 18, United States Code, Section 2113(a).

In furtherance of the conspiracy and to effect its unlawful purpose, the above-listed defendants committed and caused to be committed overt acts in the District of New Jersey and elsewhere, as set forth in Attachment B below.

In violation of Title 18, United States Code, Section 371.

COUNT TEN
(Bank Robbery)

On or about September 11, 2013, in Union County, in the District of New Jersey and elsewhere, defendant

ANDREW THOMAS

did knowingly, by force, violence, and by intimidation, take from the person and presence of employees of the Lusitania Savings Bank approximately \$1,230 in money belonging to, and in the care, custody, control, management, and possession of the Lusitania Savings 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 Title 18, United States Code, Section 2.

ATTACHMENT B

I, Jason Carley, 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. The FBI is investigating a string of eight robberies that took place between in or about November 2012 through on or about September 11, 2013, in Essex, Middlesex, Somerset, and Union counties in New Jersey. Based upon information obtained and reviewed in connection with the investigation, including video surveillance, cell phone toll records and cell site data, witness interviews, and other evidence, the robberies were perpetrated by the same individual or individuals. The total loss for the eight robberies is approximately \$49,685.50. Each of the eight robberies is described below.

2. On or about November 20, 2012, at approximately 3:30 p.m., the Wells Fargo Bank located at 550 Broad Street, Newark, New Jersey, was robbed. According to witnesses and the surveillance video from the Wells Fargo Bank, the bank robber was a male of medium build wearing a black jacket and black baseball cap. The robber, who was later identified as defendant ANDREW THOMAS, approached the customer counter and passed a handwritten note to the teller which read, in substance and in part: "Give me \$5,000. I have a gun and I'll shoot." The teller removed \$5,000 from the cash drawer and handed it to ANDREW THOMAS who then told her, in substance and in part, give me the twenties, too. The teller complied and handed ANDREW THOMAS additional money. ANDREW THOMAS took the money and the demand note and fled the Wells Fargo Bank with approximately \$9,000.

3. On or about January 10, 2013, at approximately 2:03 p.m., the Investors Savings Bank located at 946 Amboy Avenue, Edison, New Jersey, was robbed. According to witnesses and the surveillance video from the Investors Savings Bank, the bank robber was a male of medium build wearing a dark-colored coat and a black baseball cap. The robber, who was later identified as defendant ANDREW THOMAS, approached the customer counter and lifted his jacket to display what appeared to be a black handgun in his waistband. ANDREW THOMAS then removed the weapon from his waistband and pointed it at the teller and stated, in substance and in part, "give me your money, give me all your large!" The teller complied with the robber's demands and emptied her money drawers. ANDREW THOMAS took the money from the teller, placed it in his jacket, and fled the Investors Savings Bank with approximately \$7,789.50.

4. On or about May 3, 2013, at approximately 3:00 p.m., the Investors Savings Bank located at 56 Westfield Avenue, Clark, New Jersey, was robbed. The robber was a black male of medium build wearing a long-sleeved, black v-neck shirt, a black baseball cap, and blue jeans. The robber, who was later identified as defendant ANDREW THOMAS, approached the customer counter and pointed what appeared to be a black handgun at the teller. He then handed the teller a ripped gray bag, and demanded money. The teller placed money into the bag. ANDREW THOMAS

then asked another teller to place money into the bag. The teller complied with the robber's demands and placed money into the bag. ANDREW THOMAS then fled the Investors Savings Bank with approximately \$7,836.

5. Following the May 3 robbery at the Investors Savings Bank in Clark, New Jersey, an eyewitness observed a male fitting the robber's description come from the direction of the Investors Savings Bank, get into a black sedan, and drive away. The witness was able to observe partial New Jersey license plate number R60.

6. On or about May 30, 2013, at approximately 12:41 p.m., the Garden State Community Bank located at 1162 Green Street, Iselin, New Jersey, was robbed. According to witnesses and the surveillance video from the Garden State Community Bank, the bank robber was a male of medium build wearing a long-sleeved, black shirt, a black baseball cap, and blue jeans. The robber, who was later identified as defendant ANDREW THOMAS, approached the customer counter and pointed what appeared to be a black handgun at the teller. ANDREW THOMAS held out a black plastic bag and stated, in substance and in part, "give me all your large!" The teller complied with the robber's demands and placed cash into the bag. ANDREW THOMAS then fled the Garden State Community Bank with approximately \$1,576.

7. On or about June 6, 2013, at approximately 1:34 p.m., the JP Morgan Chase Bank located at 60 Stirling Road, Watchung, New Jersey, was robbed. According to witnesses and the surveillance video from the JP Morgan Chase Bank, the bank robber was a male of medium build wearing a long-sleeved, black, v-neck shirt and a black baseball cap. The robber, who was later identified as defendant ANDREW THOMAS, approached the customer counter and pointed what appeared to be a silver-colored handgun at the bank teller. ANDREW THOMAS then handed the teller a black plastic bag and exclaimed, in substance and in part, "fill it up!" The teller complied with the robber's demands and placed money into the bag. Another bank employee stood up in the vicinity of ANDREW THOMAS, who yelled, in substance and in part, "don't move your hands!" ANDREW THOMAS then took the bag filled with money and fled the JP Morgan Chase Bank with approximately \$11,266.

8. Defendant JENNIFER PINTO drove ANDREW THOMAS to and from the robbery of the JP Morgan Chase Bank located at 60 Stirling Road, Watchung, New Jersey on June 6, 2013. As described in detail below in Paragraphs 14, 15, and 16, she had knowledge that ANDREW THOMAS intended to, and in fact, did rob the JP Morgan Chase Bank on June 6.

9. On or about July 30, 2013, at approximately 11:10 a.m., there was an attempted robbery at the Wells Fargo Bank located at 550 Broad Street, Newark, New Jersey. According to witnesses and the surveillance video from the Wells Fargo Bank, the bank robber was a male of medium build wearing a long-sleeved, blue button-down shirt, a blue baseball cap, blue jeans, and black shoes. The robber, who was later identified as defendant ANDREW THOMAS, approached the customer counter and passed a note to the bank teller that demanded, in substance and in part, that the bank teller give him \$15,000. The teller walked away from the customer counter prompting ANDREW THOMAS to flee the bank without any money.

10. On or about August 10, 2013, at approximately 1:35 p.m., the Garden State

Community Bank located at 310 North Avenue, Cranford, New Jersey, was robbed. According to witnesses and the surveillance video from the Garden State Community Bank, the bank robber was a male of medium build wearing a long-sleeved, blue button-down shirt, a black baseball cap, and blue jeans. The robber, who was later identified as defendant ANDREW THOMAS, approached the customer counter and demanded that the teller place money into a bag. ANDREW THOMAS then pulled what appeared to be a black handgun from his waistband and pointed it at the teller, stating, in substance and in part, "put the money in the bag." He also pulled a black plastic bag from his waistband. The teller complied with the robber's demands and handed money to ANDREW THOMAS, who placed the money into the bag. ANDREW THOMAS then fled the Garden State Community Bank with approximately \$9,988.

11. Surveillance video from outside the Garden State Community Bank captured a silver Chevrolet Equinox driving away from the bank following the August 10, 2013 robbery.

12. Defendant JENNIFER PINTO drove ANDREW THOMAS to and from the robbery described above in Paragraph 9 of the Garden State Community Bank located at 310 North Avenue, Cranford, New Jersey on August 10, 2013. As described in detail below in Paragraphs 14, 15, and 16, she had knowledge that ANDREW THOMAS intended to, and in fact, did rob the Garden State Community Bank on August 10.

13. On or about September 11, 2013, at approximately 12:52 p.m., the Lusitania Savings Bank located at 1135 Liberty Avenue, Hillside, New Jersey, was robbed. According to witnesses and the surveillance video from the Lusitania Savings Bank, the bank robber was a male of medium build wearing a blue v-neck shirt and a black or blue baseball cap. The robber, who was later identified as ANDREW THOMAS, approached the customer counter and placed a black plastic bag on the counter. ANDREW THOMAS pointed what appeared to be a black handgun at the teller and stated, in substance and in part, "put the money in the bag." The teller complied with the robber's demands and placed money into the bag. ANDREW THOMAS then fled the Lusitania Savings Bank with approximately \$1,230.

14. Surveillance video from outside the Lusitania Savings Bank captured a silver Chevrolet Equinox driving away from the bank following the robbery. A license plate reader in the vicinity of the Lusitania Savings Bank captured the license plate number of the same silver Chevrolet Equinox, which was a New Jersey plate number Y62DFC. Further investigation revealed that the silver Chevrolet Equinox was registered to defendant JENNIFER PINTO.

15. FBI agents located JENNIFER PINTO and the silver Chevrolet Equinox at her parents' house. FBI agents contacted JENNIFER PINTO who agreed to further questioning at the Hillside Police Department. After being advised of her constitutional rights, JENNIFER PINTO disclosed that she had assisted ANDREW THOMAS in two bank robberies: the June 6 robbery of the JP Morgan Chase Bank in Watchung, New Jersey, and the August 10 robbery of the Garden State Community Bank in Cranford, New Jersey. JENNIFER PINTO admitted that she assisted ANDREW THOMAS by driving the getaway vehicle to and from those robberies, and that she was aware that ANDREW THOMAS intended to and, in fact, robbed those banks on those dates. Additionally, a black Mitsubishi sedan with New Jersey license plate R60ABC was observed in the driveway of JENNIFER PINTO's home. Further investigation revealed that this vehicle is also

registered to JENNIFER PINTO. This vehicle matches the description of the vehicle that was used to flee the bank robbery of the Investors Savings Bank in Clark, New Jersey on May 3, as described in Paragraph 5 above.

16. During a search of JENNIFER PINTO's home, FBI agents recovered the long-sleeved, blue button-down shirt that ANDREW THOMAS can be seen wearing in the surveillance images during the July 30 robbery in Newark and the August 10 robbery in Cranford. FBI agents also recovered a black-colored "cap" gun, which appears to be the same weapon that was brandished by ANDREW THOMAS during several robberies, namely the January 10 bank robbery in Edison, the May 3 bank robbery in Clark, the May 30 bank robbery in Iselin, the August 10 bank robbery in Cranford, and the September 11 bank robbery in Hillside, New Jersey.

17. Subsequently, ANDREW THOMAS surrendered to law enforcement. He admitted to robbing each of the banks, and further confirmed that he is the individual captured in the surveillance images from each of the bank robberies detailed herein.

18. At all times relevant to this Complaint, the deposits of the Garden State Community Bank, Investors Savings Bank, JP Morgan Chase Bank, Lusitania Savings Bank, and the Wells Fargo Bank were insured by the Federal Deposit Insurance Corporation.