

AO 91 (Rev. 08/09) Criminal Complaint

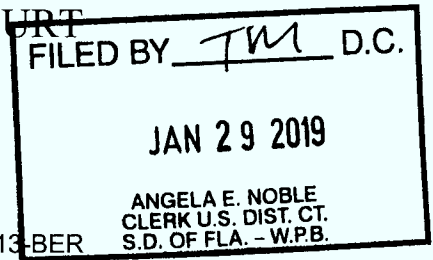
UNITED STATES DISTRICT COURT

for the

Southern District of Florida

United States of America
v.
RODRICK DOMONIQUE JONES

Case No. 19-8013-BER



Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 4/14/16 through 2/17/18 in the county of Palm Beach in the
Southern District of Florida, the defendant(s) violated:

Code Section
18 U.S.C. Section 2113(a) and (d)

Offense Description

Bank Robbery

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

A handwritten signature in black ink, appearing to read 'Daniel J. Szczepanski'.

Complainant's signature

DANIEL J. SZCZEPANSKI, Special Agent FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: 01/29/2019

A handwritten signature in black ink, appearing to read 'Bruce Reinhart'.

Judge's signature

City and state: West Palm Beach, Florida

U.S. Magistrate Judge BRUCE REINHART
Printed name and title

**AFFIDAVIT OF
DANIEL SZCZEPANSKI, SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION**

I, Daniel J. Szczepanski, being duly sworn, do state and attest as follows:

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), and I have been so employed since January 2006. I am currently assigned to PB-2, the Violent Crimes and Major Offender Squad of the Palm Beach County Resident Agency. I have primarily been assigned to investigations dealing with bank robberies, fugitives, violent crimes, and other sophisticated schemes. Based on my experience as a federal law enforcement officer, I have conducted investigations of, and have been instructed in investigative techniques concerning bank robberies and conspiracies to commit these offenses, in violation of Title 18, United States Code, Section 2113. Based upon experience, I have also become well versed in, and familiar with, the methodology utilized in bank robberies and the unique patterns employed by bank robbers.

2. This affidavit is based upon my own personal knowledge of the facts and circumstances surrounding the investigation and information provided to me by other law enforcement officers. This affidavit does not purport to contain all the information known to me about this case but addresses only that information necessary to support a finding of probable cause for the issuance of a criminal complaint charging RODRICK DOMONIQUE JONES (hereinafter JONES), with Bank Robbery, in violation of Title 18, United States Code, Section 2113 (a) and (d).

3. The United States is investigating four (4) bank robberies, two (2) of which were armed bank robberies and the other two (2) bank robberies the unidentified subject (UNSUB) indicated in his demand note that he had a gun. The respective bank robberies took place in the Southern District of Florida. Thus, the investigation concerns violations of Title 18, United States Code, Sections 2113(a) and (d).

4. On April 14, 2016, at approximately 3:50pm, an unidentified black male, entered Chase bank located at 525 NE 7th Street, Delray Beach, FL. The UNSUB was wearing a black long-sleeved shirt with a white t-shirt underneath; multicolored necktie; khaki colored pants; and a green baseball cap. The demand note stated, "DON'T WALK AWAY," which was printed in all caps and in blue ink. The demand note said to give him money, if not he would start shooting. As the victim teller read the demand note, the UNSUB removed a black, semi-automatic handgun near his waistband with his right hand and placed the weapon on the teller counter. The teller told the UNSUB they needed more time because the money was coming out of the machine. The UNSUB then said, "You better hurry up" and made a hand gesture towards the teller. The victim teller provided the subject with \$1,000.00, which was verified with the post robbery audit. At the time of the robbery, the Federal Deposit Insurance Corporation insured deposits at Chase

Bank.

5. On May 19, 2016, at approximately 3:58pm, an unidentified black male, entered Chase bank located at 5955 SE Federal Highway, Stuart, Florida, approached the bank teller and presented a demand note. The UNSUB wore a dark colored baseball hat, black long sleeve button-down shirt, and blue jean pants. The demand note stated something to the effect of, *Do not walk away! I have a gun! Give me all the money and nobody gets hurt! Do not try to be a hero. I'm serious.* The victim teller provided the subject with \$20,400.00 in US currency. At the time of the robbery, the Federal Deposit Insurance Corporation insured deposits at Chase Bank.

6. On June 22, 2017, at approximately 4:24pm, an unidentified black male entered Chase bank located at 525 NE 7th Street, Delray Beach, Florida, approached the bank teller and presented a demand note. The note stated, "Give me all the money. This is no joke. I have a gun." The UNSUB wore a gray New York Yankees baseball hat, a striped short sleeved polo shirt, dark colored pants and dark colored sneakers. After passing the demand note, the subject lifted his shirt and showed the teller a handgun that was tucked in his waistband. The subject received \$4,000 in US currency before fleeing the bank. At the time of the robbery, the Federal Deposit Insurance Corporation insured deposits at Chase bank.

7. Shortly after the robbery, a bank employee went to lock the front door of the bank. The employee watched the subject walk towards Lorne and Sons Funeral Home. During the investigation, an employee of the funeral home was interviewed. The employee stated that at some time around 4:30pm or 4:45pm he observed an older model white sedan parked in the rear parking area of the funeral home. He walked out and viewed the license plate. It was a Florida license plate and he believed it contained the characters W37. During the investigation, surveillance video was reviewed from area businesses. Video surveillance shows a white four-door sedan entering the rear parking lot of Lorne and Sons Funeral Home just prior to the robbery, then exiting the funeral home parking just after the time of the robbery. Separate surveillance video from a nearby business shows the subject walking from this vehicle toward the bank and then from the direction of the bank back to this vehicle after the robbery. A surveillance photograph of the white four-door sedan was examined by law enforcement and was believed to be a 2003 to 2008 Mazda 6 with distinct chrome rims and center pillar inserts.

8. On February 17, 2018, at approximately 1:47pm, an unidentified black male entered Chase bank located at 5955 SE Federal Highway, Stuart, Florida, approached the bank teller and presented a demand note. The demand note referred to having a gun and wanting hundreds. The UNSUB was wearing a plaid shirt, blue jeans, baseball hat and glasses. He received \$2,600 in US currency. The subject fled the bank and walked towards Beall's Outlet located on the northeast area of the shopping plaza. During the investigation surveillance video was reviewed from area businesses. Approximately twenty

minutes prior to the robbery, a gold vehicle was seen parking in the very north side of the plaza facing Cove Road. The vehicle left approximately four or five minutes after the robbery. The subject was seen walking towards this area by the bank employee. As the vehicle passed the rear of the Publix Supermarket, it appeared on surveillance video. At the time of the robbery, the Federal Deposit Insurance Corporation insured deposits at Chase bank.

9. A photograph of the gold vehicle was examined by law enforcement and was believed to be 1997 to 2001 Lexus ES300. Law enforcement conducted a database search for black males in Palm Beach County owning a 1997 to 2001 gold Lexus ES300. It was discovered that RODRICK JONES owned a gold 1999 Lexus ES300 four door. A query of JONES' Facebook profile showed a gold Lexus with the same rims as the ones in the surveillance video.

10. Department of Motor Vehicles revealed that JONES is the registered owner of a 1999 gold Lexus ES300, four door, VIN JT8BF28G1X0161275, bearing Florida license plate Y19GJP.

11. A physical surveillance was conducted around JONES' residence. A gold Lexus ES300 bearing Florida license plate Y19GJP was observed in a parking space of his apartment complex. The vehicle has a sticker in the right rear passenger's door window. The vehicle from the Publix surveillance video of the day of the robbery has what appears to be the same sticker in the same location.

12. Department of Motor Vehicles also revealed that JONES was the registered owner of a 2004 white Mazda 6, four door, VIN 1YVFP80C145N33735, bearing Florida license plate Y79LWY. On April 6, 2018, title to the respective vehicle was transferred to D.A., who resides in Delray Beach. Records revealed the new Florida license plate associated with the white Mazda 6 is Florida tag Z57ISZ.

13. A physical surveillance was conducted in Delray Beach and the 2004 white Mazda 6, four door, sedan was observed parked outside the address associated with the registered owner of the vehicle (D.A.) bearing Florida license plate Z57ISZ. The respective vehicle had the same distinct chrome rims and center pillar as depicted from the surveillance video from the June 22, 2017 robbery.

14. On August 17, 2018, investigators executed an authorized search warrant issued out of the Southern District of Florida, at 553 Cypress Drive, Lake Park, FL 33403, the residence of JONES. During the search, the following cellular telephones were seized; a white Samsung Galaxy Note 4 cellular telephone, bearing international mobile equipment identification (IMEI) #354594/06/448869/9; a black Samsung cellular telephone, bearing IMEI #355604/08/149105/2; and a white Samsung Galaxy Note 4 cellular telephone, bearing DEC#256691519004721014 (TARGET PHONE), including any SIM cards or memory cards contained therein. The TARGET PHONE was seized from the nightstand in JONES' bedroom. Additionally, the 1999 gold Lexus ES300, four door, VIN JT8BF28G1X0161275, with the same distinct rims was seized.

15. A subsequent search warrant for the respective cellular devices was issued out of the Southern District of Florida. A forensic analysis revealed that the TARGET PHONE, a white Samsung Galaxy Note 4 cellular telephone, bearing DEC#256691519004721014, was assigned telephone number 561-670-3289, which was operated by Sprint Corporation.

16. Based on a forensic review of the TARGET PHONE, on April 14, 2016 at approximately 18:40 UTC (2:40pm EST) there were three (3) Google Earth images that were captured on the TARGET PHONE, which contained satellite images of the area near the Chase Bank located at 525 NE 7th Street, Delray Beach. Two (2) of the images were aerial satellite images near the Lorne and Sons Funeral Home, which is located east of the Chase Bank across the street. The third photograph is an aerial satellite image of Federal Highway, just north of George Bush Blvd and north of the Chase Bank. As noted in paragraph 4, Chase Bank located at 525 NE 7th Street, Delray Beach, Florida was robbed at approximately 3:50pm, which was approximately one hour and ten minutes after the screen shots capturing aerial satellite images on the TARGET PHONE. The bank robbery suspect fled the bank on foot, traveled eastbound through the parking lot of Lorne and Sons Funeral Home.

17. As noted in paragraph 6, the Chase Bank located at 525 NE 7th Street, Delray Beach, Florida, was robbed again on June 22, 2017, a day after the TARGET PHONE had conducted numerous internet searches for Chase Banks. This was the second time this branch was robbed, and the suspect fled the scene towards the Lorne and Sons Funeral Home. Investigators obtained surveillance video from nearby businesses capturing a white, four-door, Mazda 6 with distinct chrome rims and center pillar, entering the Lorne and Sons Funeral Home parking lot just prior to the robbery and exiting the parking lot shortly after the robbery. The location of where the vehicle was parked is consistent with the satellite images found on the TARGET PHONE, which were captured approximately an hour prior to the first time this branch was robbed.

18. Pursuant to a search warrant issued out of the Southern District of Florida for JONES' Facebook account, records revealed a photograph of the same white Mazda 6 with chrome rims and center pillar on JONES' Facebook account. In addition, Department of Motor Vehicle records revealed JONES was the registered owner of a 2004 white Mazda 6. The Facebook search warrant also revealed a photograph of JONES wearing a gray New York Yankees baseball hat, which is similar to the baseball hat seen in bank surveillance photographs from the robbery.

19. As noted in paragraph 5, the Chase Bank located at 5955 SE Federal Highway, Stuart, Florida, was robbed on May 19, 2016, at approximately 3:58pm. Based on a review of the forensic examination of the TARGET PHONE, an image from Google Earth was captured on May 19, 2016 at approximately 15:30 UTC (11:30am EST). The respective image was an aerial satellite view of SE Cove

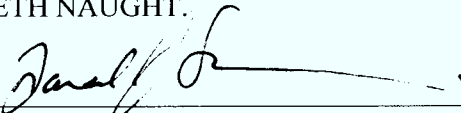
Road in Stuart, Florida. Investigators confirmed that the respective branch was within the satellite view captured on the TARGET PHONE. This image was captured approximately 4.5 hours prior to the bank robbery.

20. This bank was robbed again on February 17, 2018, at approximately 1:47pm, by an individual investigators believe to be the same person. As noted in paragraph 8, approximately twenty minutes prior to the robbery, a gold vehicle was seen parking in the very north side of the plaza facing Cove Road. The vehicle left approximately four or five minutes after the robbery. The subject was seen walking towards this area by the bank employee. As the vehicle passed the rear of the Publix Supermarket, it appeared on surveillance video. Based on a comparison of the various surveillance photographs and/or video of the Gold Lexus, investigators believe this is the same Lexus ES300 that was seized pursuant to the search warrant at JONES' residence on August 17, 2018.

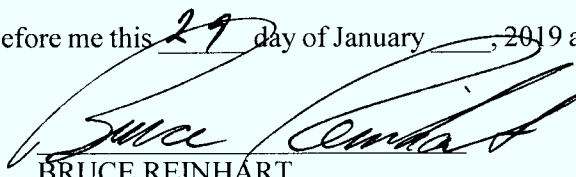
21. Based on a review of the forensic examination of the TARGET PHONE and based on the surveillance photographs and video from the four bank robberies, it appears the same person committed each of the described robberies. This belief is founded upon various evidence discovered on the TARGET PHONE linking the TARGET PHONE to the robberies as outlined above. In addition, based on the similarities in the physical description of the bank robber given by witnesses and confirmed through bank surveillance photographs, as to each of the robberies, similarities in the clothing worn by the robber in each robbery (including the baseball hat) and similarities in the method of each robbery's commission, investigators believe the same person committed each of the robberies described above.

22. Based upon the foregoing, I respectfully submit that there is probable cause to believe that RODRICK DOMONIQUE JONES, by threat of force and violence and intimidation, did take, items of value belonging to the above named bank, in violation of Title 18, United States Code, Section 2113(a) and (d).

FURTHER YOUR AFFIANT SAYETH NAUGHT.


S/A DANIEL J. SZCZEPANSKI,
Federal Bureau of Investigation

Sworn to me and subscribed before me this 29 day of January, 2019 at West Palm Beach, Florida.


BRUCE REINHART
United States Magistrate Judge

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Case No: 19-8013-BER

Defendant's Name: RODRICK D. JONES

COUNT	VIOLATION	U.S. CODE	MAX. PENALTY
I	Bank Robbery	18:2113(a) and (d)	25 years SR: 5 years \$250,000 fine \$100 special assessment