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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Leda Dunn Wettre  
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 v. : Mag. No. 16-8099  
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 ROBERT SOMERS, and :  
 :  
 ALEJANDRO ORTIZ : **Criminal Complaint**

I, Chad Eckert, 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 Task Force Officer 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.



Task Force Officer Chad Eckert  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
August 25, 2016 in New Jersey

HONORABLE LEDA DUNN WETTRE  
UNITED STATES MAGISTRATE JUDGE

  
Signature of Judicial Officer

**ATTACHMENT A**

On or about February 17, 2016, in Passaic County, in the District of New Jersey and elsewhere, defendants,

ROBERT SOMERS, and  
ALEJANDRO ORTIZ

did knowingly, by force and violence, or by intimidation, take from the person and presence of another, namely employees of a TD Bank, located in or around Passaic County, New Jersey, approximately \$1360.00 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 2.

**ATTACHMENT B**

I, Chad Eckert, am a Task Force Officer with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversation 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. Since 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 February 17, 2016, at approximately 4:00 PM, a male wearing a hooded sweatshirt, a hat with a red stripe, dark pants, and gloves, later identified as Defendant Robert SOMERS ("SOMERS"), entered a TD Bank located in or around Hawthorne, New Jersey (the "Bank"). Defendant SOMERS was holding a newspaper, which covered the bottom portion of his face.

2. After entering the Bank, defendant SOMERS approached a bank teller ("Victim Teller 1") at the customer counter, and handed Victim Teller 1 a handwritten note that read, in sum and substance, this is a hold up. Defendant SOMERS also made similar verbal statements to Victim Teller 1.

3. In response, Victim Teller 1 handed defendant SOMERS approximately \$500.00. Defendant SOMERS then demanded more money from Victim Teller 1. Another bank teller working next to Victim Teller 1 ("Victim Teller 2") handed defendant SOMERS an additional approximately \$860.00 from Victim Teller 1's drawer.

4. Defendant SOMERS took the cash and fled the Bank, dropping approximately \$420.00, as he exited the Bank.

5. A bank customer who was inside the Bank during the robbery (the "Witness") saw defendant SOMERS flee the Bank and get into the front passenger seat of what was later identified as a 2015 black Mitsubishi with Pennsylvania plates (the "Mitsubishi"). The Witness followed the Mitsubishi for several blocks and took photographs and filmed a video of the rear of the Mitsubishi, including its license plate, using a cell phone.

6. Later that evening, the police pulled over the Mitsubishi, which was driven by defendant Alejandro ORTIZ ("ORTIZ"). Defendant ORTIZ was arrested, and subsequently told the police, in sum and substance, that he had been involved in a robbery with defendant SOMERS earlier that day. Police also found the clothing that defendant SOMERS had worn during the robbery - specifically, a hooded sweatshirt, hat with red stripe, and dark pants -- in the

Mitsubishi. Police also recovered mail addressed to the address where defendant SOMERS resides.

7. Police obtained cellular telephone records for both defendants SOMERS and ORTIZ. The cellsite data revealed that both defendants SOMERS and ORTIZ were in the area of defendant SOMERS's residence in Little Falls, New Jersey around 3:10 pm on the day of the robbery, and that SOMERS was in the vicinity of the Bank around 4:00 PM on the day of the robbery, which was around the same time as the robbery.

8. Police also searched defendants SOMERS's and ORTIZ's cellphones. A search of defendant SOMERS's phone revealed that just days before the robbery, defendant SOMERS had conducted a search in his cellular phone for the business hours of the Bank. Additionally, on or about February 16, 2016, just one day before the robbery, defendant SOMERS sent a text message to defendant ORTIZ stating, in sum and substance, that he was out "scouting."

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