

UNITED STATES DISTRICT COURT

for the

Northern District of Ohio

United States of America
v.
JORDON LOUIS DONGARRA

Case No.

1:15 MJ 2009

MAG. JUDGE McHARGH

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 December 30, 2014 in the county of Cuyahoga in the
Northern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

18 USC § 2113(a) and (d)

Bank robbery by force, violence, or intimidation.

This criminal complaint is based on these facts:

See attached Affidavit of Daniel E. Richard.

FILED
2015 JAN 23 PM 2:08
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

☒ Continued on the attached sheet.

Daniel E. Richard

Complainant's signature

Daniel E. Richard, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/21/2015City and state: Cleveland, Ohio

Kenneth S. McHargh

Judge's signature

Kenneth S. McHargh, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT OF DANIEL E. RICHARD

I, Daniel E. Richard, Special Agent of the Federal Bureau of Investigation, United States Department of Justice, hereinafter referred to as "Affiant," being duly sworn an oath, hereby depose and state as follows:

INTRODUCTION

1. Affiant is an investigative or law enforcement officer of the United States, as a Special Agent ("SA") of the Federal Bureau of Investigation ("FBI"). Affiant is authorized by 18 U.S.C. § 3052 to conduct investigations of and to make arrests for federal offenses. Affiant has been employed by the FBI since August 1989, and has been assigned to the investigation of violent crime matters in the Cleveland Division for approximately two months. Affiant has been charged with the investigation of federal crimes involving bank robberies, drugs, weapons violations, kidnapping, human trafficking, and other general criminal offenses in the Northern District of Ohio. At all times during the investigation described in this affidavit, Affiant has acted in an official capacity as a SA of the FBI.

2. Affiant has participated in all of the usual methods of investigation, including, but not limited to, physical surveillance, the questioning of witnesses, and the analysis of evidence. Affiant has participated in the execution of arrest and search warrants resulting in the seizure of illegal weapons, drugs, currency, and stolen property.

3. This affidavit is offered in support of a Complaint and Arrest Warrant for JORDON LOUIS DONGARRA, charging a single count of Armed Bank Robbery in violation of Title 18, United States Code, Section 2113(a) and (d).

4. The statements contained in this affidavit are based in part on information developed by other SAs of the FBI, and Officers and Detectives of the North Olmsted Police Department ("NOPD"), all who aided in the investigation of the robbery described herein. Unless

otherwise noted, whenever in this affidavit your Affiant asserts that a statement was made, the information was provided by another law enforcement officer or an investigator, who had either direct or hearsay knowledge of the statement, to whom your Affiant has spoken or whose report your Affiant has read and reviewed. Likewise, any information pertaining to vehicles and registrations, personal data on subjects, and record checks, has been obtained through the Law Enforcement Automated Data System, various state driver's license motor vehicle records, online database searches or the National Crime Information Center computers, and various open source databases such as LexisNexis.

5. Since this affidavit is being submitted for the limited purpose of supporting the application in this matter, Affiant has not included each and every fact known to him concerning this investigation. Affiant has set forth only the facts that he believes are necessary to establish the probable cause for the issuance of the complaint and arrest warrant sought.

FACTS AND CIRCUMSTANCES REGARDING PROBABLE CAUSE

6. On Tuesday, December 30, 2014, at approximately 2:06 p.m., members of the FBI Violent Crime Task Force along with Officers and Detectives of the NOPD responded to the report of a bank robbery that occurred at the Fifth Third Bank, located at 28880 Lorain Road, North Olmsted, Ohio ("Fifth Third"). This location is within the Northern District of Ohio, Eastern Division.

7. Through confirmation by Fifth Third Bank personnel, Affiant is aware that deposits of this Fifth Third Bank were at the time of the robbery, and are at the present time, insured by the Federal Deposit Insurance Corporation.

8. Investigation revealed that the Fifth Third bank robbery was committed as follows:

a. On December 30, 2014, at approximately 2:06 p.m., a lone white male ("Bank Robber"), approximately 6'1" tall, medium build, wearing a black ski mask, flannel shirt,

grey hoodie and blue jeans, entered the bank and produced a black semi-automatic handgun. Bank Robber made verbal commands while approaching the bank teller line. Bank Robber stated he wanted “bulk” money and to open all drawers so he could see there was not additional money. Suspect appeared anxious and continuously waived the gun at both victim tellers.

b. Bank Robber produced a white garbage bag and held it open for each teller to place money into. Tellers complied by placing money from their teller drawers into the bag. Bank Robber continually demanded money from all the drawers. Each victim-teller provided one dye pack to Bank Robber. These dye packs are designed to activate when removed from the bank and subsequently explode to spread a red ink. The ink will stain currency, flesh, and most items surrounding it, thereby identifying them as being potentially involved in a bank robbery.

c. Bank Robber exited the bank through the front door and into the driver side of a red mini-van, parked directly in front of the bank doors.

d. Bank Robber’s vehicle was observed traveling westbound on Lorain Road, then south behind a shopping plaza. At that point, witnesses were no longer able to see the vehicle. Bank Robber was not apprehended at this time.

e. A bank audit, conducted by the Fifth Third employees after the robbery revealed a loss of \$13,815.00, in United States currency.

9. Subsequent to the bank robbery, Witness #1 contacted NOPD and advised Witness #1 has a co-worker named JORDON LOUIS DONGARRA (“DONGARRA”), who attempted to pay Witness #1 \$1,600, in United States currency that was stained with red ink. The stained currency provided to Witness #1 is consistent with currency that has been marked by a dye pack subsequent to a bank robbery. Witness #1 initially took the currency, but later called DONGARRA and said Witness #1 did not want the money because it was red. DONGARRA said to meet him at his house located at 725 County Road 620, in Ashland, Ohio, the next day and he would take back the currency.

10. The following day Witness #1 met with DONGARRA. DONGARRA took Witness #1 to four different places in Ashland, Ohio, and obtained four different money orders for \$400 each.

11. Witness #1 went home that night and watched the local news. Witness #1 noticed a bank was robbed in North Olmsted, and the vehicle used in the robbery matched DONGARRA's vehicle. Witness #1 contacted North Olmsted Police and advised them Witness #1 believed DONGARRA was the bank robber.

12. On January 2, 2015, DONGARRA was stopped by North Ridgeville Police for suspicion of driving intoxicated. DONGARRA subsequently was arrested for Felony DUI and was transported to North Ridgeville Police station.

13. A vehicle inventory was conducted prior to towing of the vehicle. Inside the vehicle, NOPD officers located a clear bag behind the driver's seat containing approximately \$4,500, in red dye-stained United States currency. This currency was consistent in appearance with currency which had been stolen in a bank robbery and marked by a dye-pack.

14. On January 5, 2015, investigators executed a state search warrant at DONGARRA's home, located at 725 County Road 620, in Ashland, Ohio.

15. Inside the home, investigators located multiple bank bands, which bore serial numbers that indicated they were from Fifth Third and from each victim-teller. The majority of these bands were red dye stained, consistent with currency that had be stolen in a bank robbery and marked with a dye pack.

16. Dye stains were observed inside the washer and dryer at the home. Dryer lint screen was collected as evidence because it had small particles of currency paper within the lint.

17. A small "for sale" sign for a recently purchased red 2000 Oldsmobile Silhouette was also located during the search. This vehicle is consistent in appearance with the vehicle used in the robbery of Fifth Third, but was not located at DONGARRA's home. A phone number was

on the “for sale” sign. The seller was contacted and stated that he sold the vehicle to DONGARRA on December 17, 2014, for \$400.

18. Investigators interviewed Witness #2. Witness #2 informed investigators Witness #2 recently received a jail call from DONGARRA. During the call DONGARRA asked Witness #2 to go in his house and retrieve several items. Witness #2 stated he retrieved a blanket and a shoe box from DONGARRA’s home. Witness #2 provided these items to investigators. Both the blanket and shoe box contained dye-stained United States currency, consistent with currency stolen in a bank robbery and marked with a dye pack. The jail call was retrieved and corroborates the statement made by Witness #2.

19. Subsequently, Witness #2 informed NOPD that he had seen DONGARRA’s 2000 Oldsmobile Silhouette at a local repair shop. Investigators located the vehicle and towed it back to NOPD.

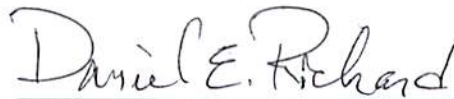
20. NOPD obtained a warrant to search the vehicle and inside located several items, including a black knit mask similar to the one used in the bank robbery. NOPD also located a head covering/du-rag with what appears to be a hand print of dye stain, and a dye stain in the middle console area of the van, which stains were consistent with items in close proximity to an exploding dye-pack.

21. Based on the evidence collected in this investigation, Affiant believes DONGARRA is the Bank Robber described herein.

CONCLUSION

22. Based on the foregoing facts, your Affiant respectfully submits that probable cause exists to believe that on Tuesday, December 30, 2014, JORDON LOUIS DONGARRA did, by force and violence, and by intimidation, take from the person and presence of employees of Fifth Third Bank, 28880 Lorain Road, North Olmsted, Ohio, located within the Northern District of Ohio, Eastern, approximately \$13,815.00, in United States currency, belonging to and in the care,

custody, control, management, and possession of said Fifth Third bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of 18 U.S.C. § 2113(a)&(d).



Daniel E. Richard
Special Agent, Federal Bureau of Investigation

Subscribed and sworn to before me this 23rd day of January, 2015.



KENNETH S. MCHARGH
United States Magistrate Judge