

Approved: Courtney L. Heavey
COURTNEY L. HEAVEY
Assistant United States Attorney

Before: THE HONORABLE JUDITH C. MCCARTHY
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA	:	<u>COMPLAINT</u>
	:	
- v. -	:	Violations of 18 U.S.C.
	:	§ 2113(a)
	:	
YOSEF ZIEGLER,	:	COUNTIES OF OFFENSE:
	:	ROCKLAND and
Defendant.	:	DUTCHESS

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SOUTHERN DISTRICT OF NEW YORK, ss.:

MOISES HASSELL, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"):

COUNT ONE
(Bank Robbery)

1. On or about January 24, 2019, in the Southern District of New York, YOSEF ZIEGLER, the defendant, knowingly, by force and violence, and by intimidation, did take, and attempt to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC"), and in doing so assaulted and put in jeopardy the life of another person by the use of a dangerous weapon or device, to wit, ZIEGLER obtained money from a bank in Pomona, New York, by claiming that he had a bomb, displaying a device he claimed was a bomb, and demanding that a bank employee turn over to ZIEGLER money in the bank's custody.

(Title 18, United States Code, Sections 2113(a) and (d).)

COUNT TWO

(Bank Robbery)

2. On or about June 25, 2019, in the Southern District of New York, YOSEF ZIEGLER, the defendant, knowingly, by force and violence, and by intimidation, did take, and attempt to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were then insured by the FDIC, and in doing so assaulted and put in jeopardy the life of another person by the use of a dangerous weapon or device, to wit, ZIEGLER obtained money from a bank in Wappingers Falls, New York, by claiming that he had a bomb, displaying an unknown device that appeared consistent with a detonator, and demanding that a bank employee turn over to ZIEGLER money in the bank's custody.

(Title 18, United States Code, Sections 2113(a) and (d).)

COUNT THREE

(Bank Robbery)

3. On or about October 29, 2019, in the Southern District of New York, YOSEF ZIEGLER, the defendant, knowingly, by force and violence, and by intimidation, did take, and attempt to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were then insured by the FDIC, and in doing so assaulted and put in jeopardy the life of another person by the use of a dangerous weapon or device, to wit, ZIEGLER obtained money from a bank in Fishkill, New York, by brandishing a firearm, and demanding that a bank employee turn over to ZIEGLER money in the bank's custody.

(Title 18, United States Code, Sections 2113(a) and (d).)

The bases for my knowledge and for the foregoing charges, are, in part, as follows:

4. I am a Special Agent with the FBI. I am personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law enforcement officers, my examination of reports and records prepared by law enforcement officers, and my involvement in this investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my

investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

The Bank Robbery Pattern

5. Based on my conversation with fellow law enforcement officers, my review of a police report from the Ramapo Police Department, and my review of surveillance photographs, I know that:

a. On or about January 24, 2019, at approximately 4:30 p.m., a male who has since been identified as YOSEF ZIEGLER, the defendant, entered a bank in the vicinity of Route 202 and Ladentown Road in Pomona, New York ("Bank-1").

b. ZIEGLER wore dark-colored clothing, including pants, a vest, a hoodie, boots, and a partial ski mask, with dark-colored face paint on his face.

c. According to witnesses at Bank-1, ZIEGLER asked for the manager and then told the manager, in sum and substance, that he had a bomb, and opened up his black bag, revealing two cylinders with wires and flashing lights. Ziegler also had an electronic device in his hand, which he claimed was a detonator. ZIEGLER then demanded the cash secured in the bank's vault, and was taken to the bank's vault, where he collected and then left with approximately \$76,000.

6. Based on my conversation with fellow law enforcement officers, my review of a police report from the Bergen County Police Department, and my review of surveillance photographs, I know that:

a. On or about April 17, 2019, at approximately 12:00 p.m., a white SUV drove behind a bank off of Kinderkamack Road, between Berthoud Street and Wayne Street in Park Ridge, N.J. ("Bank-2").

b. Thereafter, a male, subsequently identified as YOSEF ZIEGLER, the defendant, walked into the bank wearing a zip-up hooded sweatshirt, black pants and shoes, glasses, a dark-colored bicycle helmet, with what appeared to be a baseball cap on underneath, and carried a large black bag. ZIEGLER's face was not fully covered and thus the surveillance videos were

able to record clear images of his face, with just a partial ski mask covering his beard.

c. ZIEGLER told the manager, in sum and substance, that he had a bomb and that he intended to rob the bank. The manager observed that ZIEGLER had what appeared to be an electronic device in his hand, which the manager referred to as a "clicker."

d. ZIEGLER then demanded that the employees take him to the bank's vault. Once inside the vault, one of the employees opened up the cash box and handed ZIEGLER approximately \$30,150 in U.S. currency. As ZIEGLER left the bank, he warned the employees not to hit the alarm button because he had a bomb.

7. Based on my conversation with fellow law enforcement officers, my review of a police report from the New York State Police Department, and my review of surveillance photographs, I know that:

a. On or about June 25, 2019, at or about 11:52 a.m., a man who has since been identified as YOSEF ZIEGLER, the defendant, entered a bank ("Bank-3") in the vicinity of Route 9, between Myers Corners Road and Sergeant Palmateer Way, in Wappingers Falls, New York.

b. ZIEGLER wore a dark hooded sweatshirt, ski mask, dark pants and dark boots, and carried an unknown item in his hand that appeared to be attached to wires.

c. ZIEGLER announced that he had a bomb and told employees in sum and substance, that they had 30 seconds to give him what he wanted. ZIEGLER then demanded to be taken to the vault, where he instructed the employees to take out the money and put it in a garbage can. After the employee gave ZIEGLER over \$22,000 of Bank-3's money, ZIEGLER fled.

8. Based on my conversation with fellow law enforcement officers, my review of a police report from the Fishkill Police Department, and my review of surveillance photographs, I know that:

a. On or about October 29, 2019, at or about 11:58 a.m., a man who has since been identified as YOSEF ZIEGLER, the defendant, drove into the parking lot of a bank ("Bank-4"), located in the vicinity of Route 52, between

Westview Drive and Cedar Hill Road, in Fishkill, New York. ZIEGLER drove a 2019 white Dodge Ram 1500 with no visible license plate.

b. ZIEGLER wore a dark gray hooded sweatshirt, black vest, baseball cap, surgical mask, dark pants, black boots, and carried a black bag and a handgun.

c. Once inside the bank, ZIEGLER pointed the handgun in the direction of the employees, asked for the manager, and demanded, in sum and substance, that the employees empty the bank's vault, teller drawers, and ATM vault. After employees gave ZIEGLER approximately \$105,000 of Bank-4's money, ZIEGLER left, telling the employees to wait 30 seconds before calling the police.

YOSEF ZIEGLER IS IDENTIFIED

9. Based on my review of the police report prepared by the Fishkill Police Department, I know that on or about October 29, 2019, a witness who was in Bank-4 at the time of the robbery, was able to take a picture of the white Dodge Ram that the bank robber drove.

10. Based on an examination of photographs of the white Dodge Ram, law enforcement identified numerous aftermarket options. Specifically, the tool box, bed cover, short radio antenna, and "Hemi" tag with a single exhaust pipe were all aftermarket options. After visiting several Dodge dealerships and providing them with photographs of the vehicle, law enforcement learned that these items were all aftermarket options, which made the vehicle distinctive and fairly unique.

11. Based on my conversation with the Detective from the Special Investigations Squad of the Bergen County Prosecutor's Office (the "Detective") who has been involved in investigating this matter, I know that on or about November 14, 2019, a Fishkill N.Y. detective advised that he had done a search of all white Dodge Ram 1500 models through the N.Y. State Department of Motor Vehicle database and crosschecked those vehicles against Automatic License Plate Recognition ("ALPR") reads. In one of the ALPR reads the detective located a white Dodge Ram 1500 that had a similar looking tool box and bed liner to that in the photograph of the above white Dodge Ram. This 2019 white Dodge Ram 1500 bore N.Y. Registration JFP4871 and was registered to a company with an address in Spring Valley, New York.

12. A search of a law enforcement database, specifically TransUnion TLO, found that one of the listed residents of the Spring Valley address was YOSEF ZIEGLER, the defendant.¹

13. I compared a picture from the Facebook page for Joseph Ziegler and DMV records for YOSEF ZIEGLER, the defendant, to the photographs from the surveillance footage of the Bank-2 robbery, where ZIEGLER's face was visible, and confirmed that they were the same person.

14. Based on information from the ISO database,² law enforcement learned that YOSEF ZIEGLER, the defendant, identified his phone number as a number ending in 6078 (the "6078 Number") after he was in automobile accidents in or about 2016. Based on information from the cellsite provider for the 6078 Number, I know that the subscriber for the 6078 Number is the father of YOSEF ZIEGLER, the defendant. In addition, the phone number that the 6078 Number most frequently communicated with between January 1, 2019 to on or about November 1, 2019 was a phone number for which ZIEGLER's wife or ex-wife is the subscriber.

15. On or about November 14, 2019, law enforcement obtained precision location information for the 6078 Number, which led law enforcement to an EMT company in Eastchester, New York.

16. On or about November 15, 2019, while conducting surveillance in the vicinity of the EMT in Eastchester, New York, I observed a man working as an EMT who I was able to identify as YOSEF ZIEGLER, the defendant, based on a comparison of the photograph from the surveillance of the Bank-2 robbery and Facebook photographs from Joseph Ziegler's Facebook page, including one Facebook photograph where Joseph Ziegler was wearing an EMT uniform. Accordingly, I was able to confirm that ZIEGLER continued to possess the phone assigned the 6078 Number because the precision location information from that phone was

¹ TransUnion TLO is an open-source database that collects information regarding individuals, including mailing addresses, based on records from utility companies, including information from cable, cellphone, and car companies, as well as mortgage records.

² ISO is an insurance fraud detection database that collects information about insurance premiums collected and losses paid by insurance companies.

consistent with where law enforcement observed ZIEGER when conducting surveillance on or about November 14-15, 2019 and November 18 through 22, 2019.

17. Based on historical cellsite analysis for the 6078 Number, I know that the 6078 Number did not register location information during the Bank-1, Bank-2, Bank-3, or Bank-4 robberies, which I understand is consistent with the phone being turned off or placed in airplane mode.

18. Based on cellsite information for the 6078 Number and surveillance footage, I know there is a reasonable basis to believe that YOSEF ZIEGLER, the defendant, was at each bank a day or two before each robbery. Specifically:

a. Based on historical cellsite data for the 6078 Number, I know that the 6078 Number was in the vicinity of each bank in the day or two prior each robbery.

b. Based on surveillance footage from the vicinity of Bank-1, Bank-2, and Bank-4, I know that in the day or two before each respective robbery, a car matching the kind used in the respective robbery parked in the parking lot of each bank.

c. An employee of Bank-2 told law enforcement that the day before the Bank-2 robbery, just after the employee had closed the bank, a man drove up and peered inside the bank.

d. Surveillance footage from Bank-3 shows that the day before the Bank-3 robbery, a man that I was able to identify as YOSEF ZIEGLER, the defendant, walked into the bank's atrium after the bank was closed and peered into the bank.

19. Based on my training and experience, and conversations with other law enforcement officers, I know that individuals who commit bank robberies often go to the location that they plan to rob a day or two prior to the robbery in order to plan the robbery. Specifically, robbers conduct this surveillance to determine the layout of the target location, including entrances and exits, so they can plan their swift exit, including where to park any getaway vehicle. The surveillance can also help the robbers determine where security cameras are located so they can make plans to avoid detection, and in the case of banks, where the ATMs, vault, or tills they intend to rob, might be located.

20. Based on my review of the police reports and surveillance footage from each of the above-described robberies,

I know that there were numerous similarities between them. Below are just a few:

a. Each bank was located in the vicinity of a shopping center and off of a main road or highway.

b. The suspect in each of the robberies had a similar physical build, and wore similar types of dark-colored clothing.

c. In the robbery of Bank-1, Bank-2, and Bank-3, the robber claimed to have a bomb and also had what appeared to be a pocket knife sticking out of his pants pocket.

d. As described above, the 6078 Number was consistently not registering location information during each robbery, but was in the vicinity of each bank a day or two prior to each robbery.

Search Warrant

21. On or about November 26, 2019, I, along with other law enforcement officers, participated in a search warrant that included, two residences where YOSEF ZIEGLER, the defendant, had been residing, a vehicle ZIELGER had been driving, and a storage unit that he had been renting.

22. Based on my participation in the search of one of ZIELGER's residences, I know that law enforcement found: a bb-gun that is similar in appearance to the gun used in connection with the robbery on or about October 29, 2019; a pocket knife that appears similar to that used in the first three robberies described above; and approximately \$70,000 in United States currency.

23. Based on my conversation with other law enforcement officers, I know that in the storage unit that ZIEGLER was renting, law enforcement found \$2,500 cash wrapped in money ties labeled with "TrustCo Bank," and a bike helmet resembling the helmet used in connection with the robbery on or about April 17, 2019.

Federal Deposit Insurance Corporation

24. From my review of publicly available materials, as well as my training and experience as a Special Agent of the

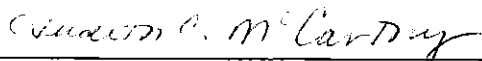
FBI, I know that, at all relevant times, the deposits of Bank-1, Bank-2, Bank-3, and Bank-4 were insured by the FDIC.

WHEREFORE, the deponent respectfully requests that YOSEF ZIEGLER, the defendant, be imprisoned or bailed, as the case may be.



MOISES HASSELL
Special Agent
Federal Bureau of Investigation

Sworn to before me this
26th day of November, 2019



THE HONORABLE JUDITH C. McCARTHY
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK