UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	**CRIMINAL COMPLAINT**
v.	:	
MAURICE RICHARDSON	:	Mag. No. 10- 4521 (LHG)

I, Bruce Kamerman, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about the dates set forth on Attachment A, in the District of New Jersey, defendant MAURICE RICHARDSON:

SEE ATTACHMENT A

In violation of Title 18, United States Code, Sections 2113(a) and 2.

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.

Bruce Kamerman, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

December 2, 2010
Date

at Trenton, New Jersey
City and State

HONORABLE LOIS GOODMAN
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

On or about December 1, 2010, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

MAURICE RICHARDSON

knowingly and willfully, by force and violence, and by intimidation did take and attempt to take from the person and presence of employees of the Capital One Bank, approximately $2,555 in money belonging to, and in the care, custody, control, management, and possession of the bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT TWO

On or about September 1, 2010, in Bergen County, in the District of New Jersey, and elsewhere, defendant

MAURICE RICHARDSON

knowingly and willfully, by force and violence, and by intimidation did take and attempt to take from the person and presence of employees of Capital One Bank, approximately $7,507 in money belonging to, and in the care, custody, control, management, and possession of the bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT THREE

On or about August 6, 2010, in Monmouth County, in the District of New Jersey, and elsewhere, defendant

MAURICE RICHARDSON

knowingly and willfully, by force and violence, and by intimidation did take and attempt to take from the person and presence of employees of the TD Bank, approximately $2,160 in money belonging to, and in the care, custody, control, management, and possession of the bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

ATTACHMENT B

I, Bruce Kamerman, a Special Agent for the Federal Bureau of Investigation, having conducted an investigation and having spoken with other individuals, have knowledge of the following facts:

1. On or about December 14, 2007, at about 6:15, p.m., an African-American male, wearing sunglasses and a skull-cap, entered the Commerce Bank (now TD Bank) located at 221 Madison Avenue, in Morris Township, New Jersey. The bankrobber then approached the teller counter and gave the teller a note which stated, in substance and in part: "Don't be a hero. Fill the envelope with large bills. No color dye packs or else." The bankrobber then stated to the teller, in substance and in part: "Do it quickly." The teller complied with the bankrobber's demand and handed approximately $6,000 in United States currency to the bankrobber. The bankrobber then took back the note, and fled the bank carrying with him approximately $6,000 in United States currency.

2. On or about May 31, 2008, at about 9:00, a.m., an African-American male, wearing sunglasses and a Yankees baseball cap, entered the Commerce Bank (now TD Bank) located at 1071 St. George's Avenue, Rahway, New Jersey. The bankrobber then approached the teller counter and gave the teller a note which stated, in substance and in part: "Give me large bills. I have a gun." The bankrobber then handed the teller a paper bag and stated to the teller, in substance and in part: "I only want 50 and 100 dollar bills. No 20s." The teller complied with the bankrobber's demand and handed approximately $10,432 in United States currency to the bankrobber. The bankrobber then took back the note, and fled the bank carrying with him approximately $10, 432 in United States currency.

3. On or about July 27, 2008, at about 2:30, p.m., an African-American male, wearing a glasses and a fisherman's cap, entered the Commerce Bank (now TD Bank) located at 575 Kingsland Street in Nutley, New Jersey. The bankrobber then approached the teller counter and gave the teller a note which stated, in substance and in part: "Give me your money." The bankrobber then stated to the teller, in substance and in part: "Give me your money." The teller complied with the bankrobber's demand and handed approximately $6,116 in United States currency to the bankrobber. The bankrobber then took back the note, and fled the bank carrying with him approximately $6,116 in United States currency.

4. On or about September 28, 2008, at about 12:20, p.m., an African-American male, wearing a baseball cap and a hood, entered the Commerce Bank (now TD Bank) located at 575 Kingsland Street in Nutley, New Jersey. The bankrobber then approached the teller counter and stated, in substance and in part: "Large bills or I will shoot you." The teller complied with the bankrobber's demand and handed approximately $9,846 in United States currency to the bankrobber. The bankrobber then took back the note, and fled the bank carrying with him approximately $9,846 in United States currency. A witness observed the bankrobber getting into a burgundy SUV-style truck.

5. On or about April 6, 2009, at about 10:00, a.m., an African-American male, wearing glasses and a Detroit Lions baseball cap, entered the Capital One Bank located at 280 Route 9 North, in Marlboro, New Jersey. The bankrobber then approached the teller counter placed a small gray shaving kit on the teller counter and gave the teller a note which stated, in substance and in part: "Give me all your money. Don't call the police or I'll shoot you." The teller complied with the bankrobber's demand and handed approximately $2,509 in United States currency to the bankrobber. The bankrobber then took back the note, put the approximately $2,509 in United States currency in the gray shaving kit and fled the bank. A witness observed the Bankrobber getting into a burgundy Chevrolet Suburban with tinted windows.

6. On or about December 21, 2009, at about 2:10, p.m., an African-American male, wearing a black wool cap, entered the Capital One Bank located at 280 Route 9 North, in Marlboro, New Jersey. The bankrobber then approached the teller counter placed a small gray shaving kit on the teller counter and gave the teller a note which stated, in substance and in part: "Put all the large bills in the bag. I don't want to see police". The bankrobber then stated to the teller, in substance and in part: "I don't want to hurt you." The teller complied with the bankrobber's demand and handed approximately $1,261 in United States currency to the bankrobber. The bankrobber then took back the note, put the approximately $1,261 in United States currency in the gray shaving kit and fled the bank.

7. I have compared the photographs taken by the Capital One Bank's surveillance cameras on December 21, 2009, with photographs of defendant MAURICE RICHARDSON. Based on that comparison, the bankrobber was defendant RICHARDSON.

8. On or about July 3, 2010, at about 11:00, a.m., an African-American male, wearing a Detroit Lions baseball cap, entered the Capital One Bank located at 459 Highway 17 South, in Hasbrouck Heights, New Jersey. The bankrobber then approached the teller counter placed a small gray shaving kit on the teller

counter and gave the teller a note which stated, in substance and in part: "Give me the money or I will shoot". The teller complied with the bankrobber's demand and handed approximately $2,420 in United States currency to the bankrobber. The bankrobber then took back the note, put the approximately $2,420 in United States currency in the gray shaving kit and fled the bank.

9. I have compared the photographs taken by the Capital One Bank's surveillance cameras on July 3, 2010, with photographs of defendant MAURICE RICHARDSON. Based on that comparison, the bankrobber was defendant RICHARDSON.

10. On or about August 6, 2010, at about 9:45, a.m., an African-American male, wearing sunglasses and a purple baseball cap, entered the TD Bank located at 4280 Route 9 South, Howell Township, New Jersey. The bankrobber then approached the teller counter placed a small gray shaving kit on the teller counter and gave the teller a note which stated, in substance and in part: "I want large bills only and I have a gun". The teller complied with the bankrobber's demand and handed approximately $200 in $50 bills. The bankrobber then reached into a backpack and pulled out a black object that resembled a firearm. The teller then handed an additional approximately $2,000 in United States currency to the bankrobber. The bankrobber then took back the note, put approximately $2,160 in United States currency in the gray shaving kit and fled the bank.

11. I have compared the photographs taken by TD Bank's surveillance cameras on August 6, 2010, with photographs of defendant MAURICE RICHARDSON. Based on that comparison, the bankrobber was defendant RICHARDSON.

12. On or about September 1, 2010, at about 9:20., a.m., an African-American male, wearing green New York Yankees baseball cap, entered the Capital One Bank located at 464 Route 17 North, Paramus, New Jersey. The bankrobber then approached the teller counter placed a small gray shaving kit on the teller counter and gave the teller a note which stated, in substance and in part: "Look at me. I am a robber. Give me all your money." The teller complied with the bankrobber's demand and handed him the money in her top drawer. The bankrobber then pulled a large black handgun out of a bag. The bankrobber then stated to the teller, in substance and in part: "Give me the second drawer and if you don't I'll come back." The teller complied with the bankrobber's demand and handed the bankrobber the money in her second drawer. The bankrobber then took back the note, put the approximately $7,507 in United States currency in the gray shaving kit and fled the bank.

13. I have compared the photographs taken by Capital One Bank surveillance cameras on September 1, 2010, with photographs of defendant MAURICE RICHARDSON. Based on that comparison, the bankrobber was defendant RICHARDSON.

14. On or about December 1, 2010, at about 11:15, a.m., a an African-American male, wearing a black wool cap, entered the Capital One Bank located at 280 Route 9 North, in Marlboro, New Jersey. The bankrobber then approached the teller counter placed a small gray shaving kit on the teller counter and gave the teller a note which stated, in substance and in part: "I have a gun if I see police, you will be shot. Large bills now." The teller complied with the bankrobber's demand and handed approximately $2,555 in United States currency to the bankrobber. The bankrobber then took back the note, put the approximately $2,555 in United States currency in the gray shaving kit and fled the bank. The teller then called the police an told them that the bank had been robbed by "the same guy" who had robbed it before. In response the police put out a notice to be on the lookout for a burgundy Chevrolet Suburban with tinted windows.

15. A police officer observed the burgundy Chevrolet Suburban with tinted windows entering Route 9 North from a street adjacent to the Capital One Bak's parking lot. After an approximately mile-long pursuit, the burgundy Chevrolet Suburban with tinted windows struck the concrete wall and come to a stop. MAURICE RICHARDSON then got out of the burgundy Chevrolet Suburban, and attempted to flee, but was apprehended. A 9 mm bullet was found in the burgundy Chevrolet Suburban, and 9mm handgun was found after a search of the area near where the burgundy Chevrolet Suburban crashed.

16. Thereafter, law enforcement officers interviewed defendant MAURICE RICHARDSON. After being advised of his rights, and waving same, defendant RICHARDSON admitted, in substance and in part, that he had robbed each of the banks described above.

17. At all times relevant to this Complaint, the deposits of each of the banks described in this complaint were insured by the Federal Deposit Insurance Corporation.