
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. :
 : Mag. No. 11-4528(LHG)
 :
 KENNETH DARRIAN :

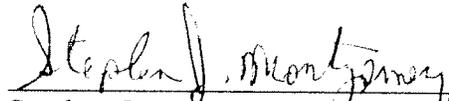
I, Stephen J. Montgomery, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent of 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.



Stephen J. Montgomery, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

July 5, 2011 at Trenton, New Jersey

HONORABLE LOIS H. GOODMAN
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

On or about June 23, 2011, in Mercer County, in the District of New Jersey and elsewhere, defendant KENNETH DARRIAN

did knowingly, by force and violence, and by intimidation, take from the persons and presence of the employees of the Chase Bank, 1850 Klockner Road, Mercerville, New Jersey, money belonging to and in the care, custody, control, management and possession of the bank, a financial institution whose deposits 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, Stephen J. Montgomery, am a Special Agent of the Federal Bureau of Investigation ("FBI"). I have personally participated in this investigation and am aware of the facts contained herein, based on my own investigation, as well as information provided to me by other law enforcement officers. Since this affidavit is submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not necessarily included each and every fact known by the Government concerning this investigation. Statements contained herein are provided in substance and in part.

1. I have been employed as an FBI Special Agent for approximately 20 years, and I am currently assigned to the Trenton Office, where I investigate violent crimes, including bank robberies. During the course of my tenure with the FBI, I have participated in over 100 investigations of violent crimes.

2. On or about June 23, 2011, at approximately 3:50 P.M., the Chase Bank in Mercerville, New Jersey was robbed. According to witnesses and bank surveillance video, the robber was a black male wearing a black wig and a tan dress over a tight black shirt. The robber approached the teller counter and inquired about purchasing a money order. As the teller attempted to assist the robber, the robber pulled what appeared to be a black handgun from a bag he was carrying and pointed it at the teller. The robber then vaulted the counter and began to yell "open the fucking drawer". The Assistant Manager of Chase Bank was standing behind the teller counter close to the teller. The Assistant Manager took her keys and opened the teller drawer in front of them. The robber reached into the drawer and retrieved a sum of cash from the teller drawer.

3. A witness outside the Chase bank observed a black male in a dress and a wig enter a red Pontiac Grand Am. The witness observed what he believed to be a New Jersey license plate with the numbers/letter 29 U or V on the red Pontiac.

4. During law enforcement's investigation, the following occurred. A review of bank surveillance video provided clear images of the individual described by bank employees as well as other witnesses. One particular image depicted the robber wearing a tan sleeveless dress with a flower design on the front as well as what appeared to be a black wig. The individual was observed brandishing a black handgun. On June 27, 2011, a Trenton police officer observed a red Pontiac Grand Am with New Jersey registration, ZUV-29R, parked near a residence on East Ingham Avenue, Trenton, New Jersey. Subsequent investigation conducted by the Hamilton Police Department determined that defendant, Kenneth Darrian, was a resident of this location and a driver of the red Pontiac. Investigation further determined that Darrian fit the general description of the individual who robbed the Chase Bank on June 23, 2011. The investigation also revealed that Darrian had several outstanding local warrants.

5. On June 27, 2011, Darrian was arrested by the Hamilton Police Department for those outstanding warrants. On June 28, 2011, while in custody at the Hamilton Police Department and after being given his Miranda warnings and agreeing to a Waiver of his Miranda rights, Darrian was interviewed by law enforcement. Darrian admitted to robbing the Chase Bank on June 23, 2011. Darrian stated that he purchased the dress he wore during the robbery on Friday,

June 17, 2011 at the Dots Clothing Store in Ewing, New Jersey. Darrian also stated that he obtained the wig he wore during the robbery from the Empire Beauty School he currently attends. Darrian stated that he used a black plastic gun during the robbery and that he hid this plastic gun in the woods next to the Empire Beauty School. Darrian also admitted that he drove a red Pontiac Grand Am, New Jersey registration ZUV-29R, to the Chase Bank on June 23, 2011.

6. Darrian was driven by law enforcement to a wooded location next to the Empire Beauty School at which time the plastic gun was recovered by law enforcement.

7. Subsequent investigation conducted at Dots Clothing Store revealed Darrian purchased an item on Friday, June 17, 2011. The stock-keeping unit number for this item described it as a sleeveless dress.

8. At all relevant times to this Complaint, the Chase Bank in Mercerville, New Jersey was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation.