
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Cathy L. Waldor
 :
 v. : Mag. No. 12-7043 (CLW)
 :
 JELANI BUSTAMONTE : CRIMINAL COMPLAINT

I, Mary Anne Flippo, 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 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.



MARY ANNE FLIPPO
Special Agent
Federal Bureau of Investigation

Sworn to before me and
subscribed in my presence,

January 25, 2012 at Newark, New Jersey

HONORABLE CATHY L. WALDOR
U.S. MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

From in and around September 2011 through in and around December 2011, in Union County, in the District of New Jersey, and elsewhere, defendant

JELANI BUSTAMONTE

did knowingly and intentionally conspire and agree with others to commit an offense against the United States, that is, to take, by force and violence, and by intimidation, from the person or persons of bank employees, property, money and other things of value belonging to, and in the care, custody, control, management and possession of the banks, contrary to Title 18, United States Code, Section 2113(a).

In furtherance of the conspiracy and to effect its unlawful object, the defendant and others committed and caused to be committed the overt acts, among others, set forth in Attachment B below.

In violation of Title 18, United States Code, Section 371.

ATTACHMENT B

I, Mary Anne Flippo, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I am fully familiar with the facts set forth herein based on my own investigation, my conversations 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 September 11, 2011, at approximately 2:21 p.m., an individual not named as a defendant herein ("the Co-conspirator") entered the TD Bank located at 560 North Avenue East, Westfield, New Jersey ("TD Westfield") and passed a deposit slip across the counter towards a bank teller. The bank teller, who was in the process of counting cash at the counter, did not see the handwriting on the note or any monetary amount listed, and attempted to return the slip back to the Co-conspirator. The Co-conspirator pushed the paper slip back across the counter and ordered the teller to "read it." The teller read the handwritten note, which stated, "I want all the money lo[o]se bills."

2. The teller stepped back upon reading the demand note. The Co-conspirator then reached over the counter, took the cash that the teller had been counting at the counter, and left with approximately \$5,721.00 in United States currency. The bank's video surveillance camera recorded the entire incident and captured images of the Co-conspirator.

3. From in and around October 2011 through December 2011, six additional bank robberies occurred at TD Bank locations throughout New Jersey. On or about December 28, 2011, the Co-conspirator was charged with the bank robbery of a TD Bank located in Rahway, New Jersey, which occurred on November 19, 2011.

4. A consensual search of the Co-conspirator's cellular phone revealed text messages exchanged, in November and December 2011, between the Co-conspirator and "J Slave," an individual subsequently identified through investigation as defendant JELANI BUSTAMONTE. Defendant BUSTAMONTE is a TD Westfield employee.

5. Defendant BUSTAMONTE and the Co-conspirator discussed, in text messages, when and how the vault of TD Westfield could be robbed. Defendant BUSTAMONTE told the Co-conspirator, in sum and substance, the following information: (1) the amount of money stored inside the vault; (2) when the vault would be replenished and/or filled; (3) that certain employees possessed the codes necessary to open the vault; (4) the protocol for opening the vault; and (5) the time of day when the vault would be opened. The Co-conspirator also asked defendant BUSTAMONTE whether he had access to a bb gun.

6. In a subsequent interview with law enforcement, defendant BUSTAMONTE told law enforcement, in sum and substance, the following information: (a) defendant BUSTAMONTE, the Co-conspirator and others discussed robbing the vault of TD Westfield and the amount of money inside the vault; (b) that defendant BUSTAMONTE advised the Co-conspirator to go with one other person to rob the vault; and (c) that the Co-conspirator agreed to give defendant BUSTAMONTE \$40,000 to \$50,000 of the money from the vault.

7. Defendant BUSTAMONTE also acknowledged, during the interview, in sum and substance, that he had told the Co-conspirator the following information in advance of the September 11, 2011 bank robbery of TD Westfield: (a) the layout of the Westfield branch location; (b) whether guards would be present; (c) the location of the safe; (d) the amount of cash available in bank teller drawers; (e) that the Co-conspirator should ask for "loose bills" and not strapped money; (f) when tellers push their emergency buttons; and (g) how the Co-conspirator should exit in order to avoid or delay triggering the bank's alarms. Defendant BUSTAMONTE further acknowledged that, on or before September 11, 2011: (a) he knew that the Co-conspirator would be attempting to rob TD Westfield; (b) he was working at TD Westfield on September 11, 2011, the date the bank was robbed; and (c) he recognized the Co-conspirator as the bank robber on September 11, 2011 but did not disclose the Co-conspirator's identity to Westfield bank personnel or law enforcement.

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