

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Honorable Tonianne Bongiovanni
 :
 CHRISTOPHER KERINS : Mag. No. 10-5022

I, Stephen J. Montgomery, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or around August 8, 2010, in Mercer County, in the District of New Jersey, the defendant did:

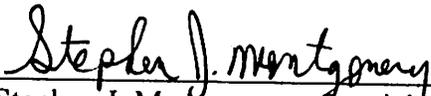
knowingly, by force and violence, and by intimidation, did take from the person and presence of an employee of TD Bank, located in Pennington, New Jersey, money belonging to, and in the care, custody, control, management, and possession of the bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

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

I further state that I am a Special Agent for the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT A

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,
August 9, 2010, at Newark, New Jersey

HONORABLE TONIANNE BONGIOVANNI
UNITED STATES MAGISTRATE JUDGE


Signature of Judicial Officer

RECEIVED

AUG 9 - 2010

TONIANNE J. BONGIOVANNI
U.S. MAGISTRATE JUDGE

ATTACHMENT A

I, Stephen J. Montgomery, am a Special Agent with the Federal Bureau of Investigation, and based upon my investigation and my discussion with other individuals involved in this investigation, I have knowledge of the facts which appear below.

1. On August 8, 2010, at approximately 1107 hours, Pennington Borough Police were dispatched to TD Bank, located at 5 North Route 31, Pennington, New Jersey 08534 to a reported bank robbery. A 9-1-1 caller stated an elderly white male wearing a red hat with white colored writing, a red colored shirt, beige colored shorts, and black colored glasses showed the bank teller a note and stated he had a weapon. After the robbery, the defendant CHRISTOPHER KERINS reportedly fled on foot to the lot behind the Exxon gas station and then fled southbound on Route 31 in a red colored Hyundai bearing New Jersey registration JVX-54Y ("suspect vehicle"). An alert was broadcast for the suspect vehicle to surrounding towns using the Mercer County crime alert radio. The registration given by the caller, New Jersey JVX-54Y was run through New Jersey Division of Motor Vehicles computer system and was found to be registered to the mother of defendant CHRISTOPHER KERINS.

2. The teller stated she arrived for work at approximately 1025 hours and actually clocked in for work at 1030 hours. After opening the vaults and entering necessary security codes, she prepared her work station. All tellers were prepared for customers at approximately 1050 hours and the employees were mingling in the customer service representative area until the doors could be opened for customers at 1100 hours. The doors were unlocked at 1100 hours, however, all the employees stayed at the customer service representative area for a few minutes because there were no customers. Within a few minutes, a vehicle pulled into the parking lot and the teller went to the teller area. As she walked to the teller area, the teller observed a man walking through the parking lot on the West Delaware Avenue side of the bank. Once behind the teller counter, the teller observed the defendant CHRISTOPHER KERINS enter the bank and walk quickly to her counter. The teller stated, "How can I help you?" The defendant CHRISTOPHER KERINS threw a black garbage bag over the counter and said, "I have a gun. Put money in the bag quickly." The teller replied, "Really, how can I help you?" The defendant CHRISTOPHER KERINS said, "I have a gun. Put the damn money in the bag," to which the teller replied, "Seriously." The defendant CHRISTOPHER KERINS replied, "Yes" and the teller put all of the United States currency from her top teller drawer into the bag, including marked bait money. While placing the currency into the bag, the teller activated the silent alarm. The teller handed the defendant CHRISTOPHER KERINS the bag and said, "Have a nice day." The defendant CHRISTOPHER KERINS replied, "Thank you" and quickly exited the bank and walked through the parking lot towards West Delaware Avenue.

3. Employees of TD Bank performed an audit of the teller's teller drawers. It was determined that \$1,423 in assorted United States currency was missing from the teller's drawer and were the proceeds of the bank robbery.

4. A civilian who was in the area of the TD Bank, observed the defendant CHRISTOPHER KERINS running from the area of the bank carrying a black garbage bag. The

civilian thought this behavior was strange and observed the defendant CHRISTOPHER KERINS enter a car and the civilian wrote down the license plate and watched the direction the car fled. The civilian went to the bank and found the doors were locked. An employee came to the door and he told the employee he had the license plate. This information was called into the police and led to the police broadcast described in paragraph 1 above.

5. Upon learning the address of the suspect vehicle, Hopewell Township Police Officer Lincoln Karnoff responded to 153 Church Road, which is within the jurisdiction of Hopewell Township. Officer Karnoff did not observe the suspect vehicle at the residence and began surveillance of 153 Church Road by parking in an area close to the residence with concealment so as to not make his marked patrol vehicle visible to the suspect. From this location, Officer Karnoff could see the residence of 153 Church Road as well as the driveway leading to the residence.

6. At approximately 1300 hours, Officer Karnoff observed the suspect vehicle arrive at 153 Church Road. Officer Karnoff drove towards the suspect vehicle and requested a back-up unit. Upon the arrival of the back-up police unit, the defendant CHRISTOPHER KERINS was removed from the vehicle and held for investigative detention. At the time defendant CHRISTOPHER KERINS was detained he was wearing a beige colored shirt, beige colored shorts, white calf high socks, and white sneakers. No hat or glasses were observed on defendant CHRISTOPHER KERINS. The defendant CHRISTOPHER KERINS was also frisked for the safety of the officers. During this frisk, a large amount of assorted United States Currency was located in the defendant CHRISTOPHER KERINS's front right and front left short pockets. His wallet was located in his right rear shorts pocket. Detective Robert Crusen of the Mercer County Prosecutor's Office, who was investigating the bank robbery, went to 153 Church Road to view the defendant CHRISTOPHER KERINS. Detective Crusen had viewed still images of the bank robbery, and the defendant CHRISTOPHER KERINS and Detective Crusen both worked at the Trenton Police Department in the past and are familiar with one another. Upon seeing Detective Crusen, the defendant CHRISTOPHER KERINS stated, "Hey Bob, what is going on here?" Detective Crusen replied, "We are conducting an investigation. We will talk in a little bit." While talking, Detective Crusen observed a bulge in the defendant CHRISTOPHER KERINS's left sock. Detective Crusen asked the defendant CHRISTOPHER KERINS what it was. The defendant CHRISTOPHER KERINS replied that he had additional money in his left sock. The defendant CHRISTOPHER KERINS was brought to the Hopewell Township Police Department to be held. While at the Hopewell Township Police Department, the assorted United States currency was removed from the defendant CHRISTOPHER KERINS's left sock. A total of \$1377 was found on the defendant CHRISTOPHER KERINS, including the marked bait money from the bank.

7. At all times relevant to this Complaint, the deposits of TD Bank in Pennington, New Jersey were insured by the Federal Deposit Insurance Corporation.