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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

GEROD WOODBERRY,

Defendant.

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FILED UNDER SEAL

**AFFIDAVIT AND COMPLAINT
IN SUPPORT OF AN ARREST
WARRANT**

(18 U.S.C. § 2113(a))

20-2011052

EASTERN DISTRICT OF NEW YORK, SS:

ELISABETH WHEELER, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about January 10, 2020, within the Eastern District of New York, the defendant GEROD WOODBERRY did knowingly and intentionally take and attempt to take by force, violence and intimidation, from the person and presence of another, money belonging to and in the care, custody, control, management and possession of a bank or other financial institution, to wit: Chase Bank, the deposits of which are insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Section 2113(a))

The source of your deponent's information and the grounds for her belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been involved in the investigation of numerous bank robberies. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant’s criminal history record; and from reports of law enforcement officers involved in the investigation.

2. On or about January 10, 2020, at approximately 5:35 p.m., the defendant GEROD WOODBERRY entered the branch of Chase Bank located at 20 Flatbush Avenue, Brooklyn, New York (the “Bank”) and proceeded to a teller. The defendant had a dark mustache and was wearing a black and red baseball hat with what appeared to be a Chicago Bulls logo, a dark jacket and hooded sweatshirt with the hood down, ripped jeans and grey sneakers. He passed a demand note (the “Demand Note”) to the teller. The Demand Note stated, “THIS IS A ROBBERY BIG BILLS ONLY NO DYE PACKS.” The teller handed the defendant approximately \$1,000 in United States currency. The defendant took the money and fled the Bank.

3. Members of the New York City Police Department (“NYPD”) responded to the scene and recovered the Demand Note and surveillance video of the robbery.

4. The Demand Note was submitted to the NYPD laboratory for fingerprint analysis.

5. I have reviewed the surveillance video, and the physical appearance of the robber depicted in the surveillance video is consistent with the age, race, and appearance that law enforcement has on file for the defendant from an arrest on January 8, 2020 for a December 30, 2019 bank robbery in New York County, under docket number CR-000736-

20NY. The defendant GEROD WOODBERRY was arrested by law enforcement for bank robbery on January 8, 2020 and released without bail.

6. I have confirmed that the deposits of Chase Bank are insured by the Federal Deposit Insurance Corporation.

7. I further request that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant. Based upon my training and experience, I have learned that criminals actively search for criminal affidavits and arrest warrants via the internet. Therefore, premature disclosure of the contents of this affidavit and related documents will seriously jeopardize the investigation, including by giving targets an opportunity to flee or continue flight from prosecution, destroy or tamper with evidence and change patterns of behavior.

WHEREFORE, your deponent respectfully requests that the defendant GEROD WOODBERRY, be dealt with according to law.



ELISABETH WHEELER
Special Agent
Federal Bureau of Investigation

Sworn to before me this
14th day of January, 2020

THE HONORABLE RAMON E. REYES, JR.
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK