UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JAMES GLENN	:	Criminal Complaint
v.	:	Mag. No. 16-[]
	:	
UNITED STATES OF AMERICA	:	Hon. []

I, Brian M. Salamone, 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.

Special Agent Brian M. Salamone Federal Bureau of Investigation

Sworn to before me and subscribed in my presence, February 5, 2016 in New Jersey

HONORABLE MICHAEL A. HAMMER

UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE (Bank Robbery)

On or about August 28, 2015, in Union County, in the District of New Jersey and elsewhere, defendant,

JAMES GLENN

did knowingly, by force and violence, or by intimidation, take from the person and presence of another, namely employees of Connect One Bank, located in or around Union, New Jersey, approximately \$5,000.00 in money belonging to, and in the care, custody, control, management, and possession of Connect One Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT TWO (Bank Robbery)

On or about September 9, 2015, in Essex County, in the District of New Jersey and elsewhere, defendant,

JAMES GLENN

did knowingly, by force and violence, or by intimidation, take from the person and presence of another, namely employees of Hudson City Savings Bank, located in or around Roseland, New Jersey, approximately \$4,197.00 in money belonging to, and in the care, custody, control, management, and possession of Hudson County Savings Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT THREE (Bank Robbery)

On or about September 25, 2015, in Essex County, in the District of New Jersey and elsewhere, defendant,

JAMES GLENN

did knowingly, by force and violence, or by intimidation, attempt to take from the person and presence of another, namely employees of TD Bank, located in or around Orange, New Jersey, approximately \$500 in money belonging to, and in the care, custody, control, management, and possession of TD Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FOUR (Bank Robbery)

On or about September 28, 2015, in Union County, in the District of New Jersey and elsewhere, defendant,

JAMES GLENN

did knowingly, by force and violence, or by intimidation, take from the person and presence of another, namely employees of Connect One Bank, located in or around Union, New Jersey, approximately \$6,000.00 in money belonging to, and in the care, custody, control, management, and possession of Connect One Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT FIVE (Bank Robbery)

On or about October 16, 2015, in Union County, in the District of New Jersey and elsewhere, defendant,

JAMES GLENN

did knowingly, by force and violence, or by intimidation, take from the person and presence of another, namely employees of Santander Bank, located in or around Union, New Jersey, approximately \$12,000.00 in money belonging to, and in the care, custody, control, management, and possession of Santander Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

ATTACHMENT B

I, Brian M. Salamone, 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 conversation 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 August 28, 2015, an African-American male with facial hair, wearing sunglasses and a "Kangol" style hat, later identified as Defendant JAMES GLENN ("GLENN"), entered a Connect One Bank located in or around Union, New Jersey, approached a victim bank teller ("Victim Teller 1") and handed Victim Teller 1 a handwritten note demanding \$5,000. Victim Teller 1 handed GLENN approximately \$5,000 in United States currency. GLENN took the cash and exited the bank.
- 2. Victim Teller 1 then alerted other bank employees that the bank had been robbed. Another employee at the bank then walked outside and observed GLENN entering the passenger side of a cream colored four-door sedan.
- 3. On or about September 9, 2015, GLENN entered a Hudson City Savings Bank located in or around Roseland, New Jersey, approached a victim bank teller ("Victim Teller 2"), and handed Victim Teller 2 a handwritten note demanding \$5,000 and indicating, in sum and substance, "[t]his is a robbery . . . [t]his is not your money so be careful – [n]o alarms [n]o dye pack I know them. No one wants to get hurt so remember I know where you live." Victim Teller 2 provided GLENN with approximately \$4,197 in United States currency. GLENN took the cash and exited the bank. Witnesses identified the bank robber as an African-American male with facial hair who wore sunglasses and a hat.
- 4. Latent fingerprints obtained from the crime scene at the Hudson City Savings Bank robbed on or about September 9, 2015 matched GLENN's fingerprints. At the time, GLENN had an active Violation of Parole Warrant for Robbery and his whereabouts were unknown.

- 5. On or about September 25, 2015, GLENN entered a TD Bank located in or Orange, New Jersey, approached a victim bank teller ("Victim Teller 3"), and handed Victim Teller 3 a handwritten note demanding \$5,000 and indicating "[t]his is a robbery . . . [n]o foil or dye packs we know them," and "[w]e know where you live so be carefull [sic] you have 2 minutes. Please dont [sic] make us hurt you." Victim Teller 3 handed GLENN approximately \$500 in United States currency in a clear plastic bag containing a dye pack. GLENN took the cash and exited the bank.
- 6. Local law enforcement who arrived at the TD Bank found the clear plastic bag containing the activated dye pack and money near the bank, on or around Highland Avenue, Orange, New Jersey.
- 7. On or about September 28, 2015, GLENN entered the same Connect One Bank in Union, New Jersey, that he previously robbed on or about August 28, 2015, again approached Victim Teller 1, and handed Victim Teller 1 a handwritten note demanding \$6,000 and warning: "Remember this is not your money, that way [n]o one gets hurt. No dye packs I know them and we know where you live . . . [y]ou only have 2 minutes." Victim Teller 1 provided GLENN approximately \$6,000 in United States currency. GLENN took the cash and left the bank.
- 8. On or about October 16, 2015, GLENN entered a Santander Bank in or around Union, New Jersey, approached a victim bank teller ("Victim Teller 4"), and handed Victim Teller 4 a note demanding \$5,000 in cash and instructing the teller to "take the bands off no dye packs [r]emember this is not your money and we know where you live. You have 2 minutes to comply and everybody goes home safe." Victim Teller 4 provided GLENN with approximately \$12,000 in United States currency. GLENN took the cash and exited the bank.
- 9. On or about October 27, 2015, GLENN was located in Elizabeth, New Jersey, and placed under arrest for outstanding warrants.
- 10. On or about October 28, 2015, after local law enforcement officers advised GLENN of his *Miranda* rights, and GLENN waived his *Miranda* rights, GLENN confessed to committing the two bank robberies at Connect One Bank in August and September 2015; the bank robbery on or about September 25, 2015 at TD Bank; and the bank robbery on or about October 16, 2015 at Santander Bank.
- 11. At all times relevant to this Complaint, the deposits of the aforementioned banks were insured by the Federal Deposit Insurance Corporation.