

UNITED STATES DISTRICT COURT

for the
District of New Jersey

United States of America

v.

LEON I. STANFORD

Case No.

20-mj-4015 (JS)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 22 and 24, 2020 in the county of Camden in the
District of New Jersey, the defendant(s) violated:

Code Section

Two counts of Title 18 U.S.C.
Section 2113(a).

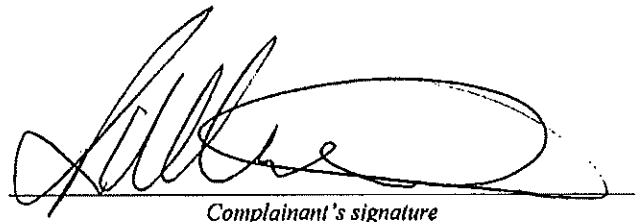
Description of Offenses

See Attachment A

This criminal complaint is based on these facts:

See Attachment B

☒ Continued on the attached sheet.



Complainant's signature

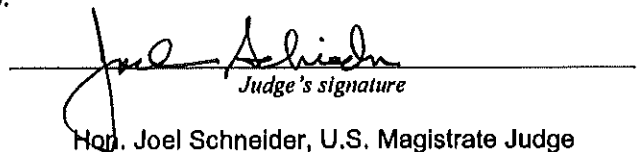
S/A Rodney McCarter, FBI

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

telephone _____ (specify reliable electronic means).

Date: 11/04/2020



Judge's signature

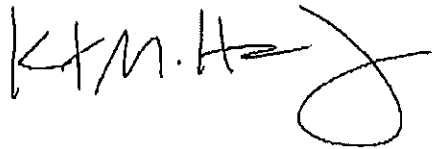
City and state: District of New Jersey

Hon. Joel Schneider, U.S. Magistrate Judge

Printed name and title

CONTENTS APPROVED

UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'K.M. Harberg', with a large, stylized circular flourish at the end.

By:

KRISTEN M. HARBERG, AUSA

Date: November 3, 2020

ATTACHMENT A

Count One

On or about February 22, 2020, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

LEON I. STANFORD,

did knowingly, by force and violence, and by intimidation, take, from the person and presence of another, money belonging to, and in the care, custody, control, management, and possession of TD Bank, 1130 White Horse Pike, Oaklyn, New Jersey, a financial institution whose deposits were then insured by the Federal Deposit Insurance Corporation.

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

Count Two

On or about February 24, 2020, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

LEON I. STANFORD,

did knowingly, by force and violence, and by intimidation, take, from the person and presence of another, money belonging to, and in the care, custody, control, management, and possession of Republic Bank, 339 Route 70 East, Cherry Hill, New Jersey, a financial institution whose deposits were then insured by the Federal Deposit Insurance Corporation.

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

ATTACHMENT B

I, Rodney McCarter, 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 Affidavit is being submitted for the limited purpose of establishing probable cause, I have not set forth every fact that I know concerning this investigation. Where I assert that an event took place on a particular time, I am asserting that it took place on or about the date alleged.

1. In the late morning of February 22, 2020, the TD Bank located at 1130 White Horse Pike, Oaklyn, New Jersey (hereinafter, "the TD Bank"), a financial institution whose deposits were then insured by the Federal Deposit Insurance Corporation (hereinafter, "the FDIC"), was robbed.
2. After reviewing the bank's surveillance video and obtaining statements from numerous witnesses, the police learned that at approximately 11:48 am, a black male entered the TD Bank and handed the bank teller victim a note that stated, "Small bills / no dye pack / this is a robbery." The victim immediately handed approximately \$500.00 to the perpetrator, and he walked out of the TD Bank with the cash. Witnesses saw him drive away in a white, older model SUV style vehicle. Additional surveillance video from a nearby business was reviewed, and it showed that the white SUV style vehicle had a Pennsylvania license plate with a partial license plate number of either "6822" or "6022." This information was run through Central Communications, which generated a lead for a possible match to a 2004 white Saturn Vue, Pennsylvania license plate number "KLH6022." Officers subsequently learned that the DEFENDANT, LEON STANFORD had been driving that vehicle on February 11, 2020, at which time it was stopped by an officer from the Mount Ephraim Police Department. I learned that STANFORD was currently on federal supervised release as a result of his prior bank robbery convictions. I obtained a recent photograph of STANFORD, and saw that his appearance was consistent with the person who had robbed the TD Bank.
3. On February 24, 2020, officers spoke to one of STANFORD'S relatives (hereinafter, "Relative 1"). Officers advised Relative 1 that they wanted to speak to him/her about an active investigation, and Relative 1 immediately stated that he/she knew that they wanted to speak to him/her about STANFORD. Relative 1 advised that he/she had known STANFORD for many years. Relative 1 viewed a still photograph from the TD Bank video, and he/she identified the person in the photograph as STANFORD. Relative 1 stated that STANFORD drove a white Saturn crossover style vehicle, and the last time he/she saw STANFORD was earlier that week, at which time STANFORD was driving the white Saturn. Relative 1 said that STANFORD had been doing well, but he had recently relapsed and was using drugs. Relative 1 said that he/she saw the story about the bank robbery in the news, and when he/she saw the image of the perpetrator, he/she knew it was STANFORD.
4. Also on February 24, 2020, officers spoke to another relative of STANFORD (hereinafter, "Relative 2"). Relative 2 has known STANFORD for many years.

Relative 2 viewed a still photograph from the TD Bank video, and he/she identified the person in the photograph as STANFORD. Relative 2 stated that he last saw STANFORD the previous week, and that STANFORD had recently relapsed. Relative 2 stated that STANFORD drives a white Saturn with unknown Pennsylvania registration.

5. That afternoon, the Republic Bank located at 399 Route 70 East, Cherry Hill, New Jersey (hereinafter, "the Republic Bank"), a financial institution whose deposits were then insured by the FDIC, was robbed.
6. After reviewing the bank's surveillance video and obtaining statements from numerous witnesses, the police learned that at approximately 3:16 pm, a black male entered the Republic Bank and handed the bank teller victim a note that stated, "Small bills / no die pack / bank robbery." The victim immediately approximately \$555.00 to the perpetrator, and he walked out of the Republic Bank with the cash. Witnesses saw him drive away in a white Saturn SUV with a Pennsylvania license plate beginning with KLH.
7. The bank teller victim and a bank employee witness both viewed photo arrays that contained STANFORD's photograph, but both were unable to make a positive identification. Officers then proceeded to Relative 2's home and showed him/her still images from the Republic Bank video. Relative 2 positively identified the person in the photos as STANFORD.
8. On February 25, 2020, officers interviewed another relative of STANFORD (hereinafter, "Relative 3"). Relative 3 has known STANFORD for many years. Relative 3 stated that he/she saw the news article about the TD Bank robbery, and that the perpetrator did not resemble STANFORD. Relative 3 viewed still shots that were made from the TD Bank and the Republic Bank videos, and he/she did not make an identification. Relative 3 said that he/she last saw STANFORD the previous week, and at that time, STANFORD was driving a white Saturn SUV with Pennsylvania license plate number KLH6022. Relative 3 consented to a search of his/her cellphone. Officers searched his/her cellphone and saw that on February 22, 2020, Relative 3 sent a text message to an individual that stated, "Hey bad news. [STANFORD] robbed a bank." Officers also saw that on February 23, 2020, Relative 3 forwarded a link to a news article about the TD Bank robbery to the person he/she had texted the previous day.
9. On February 26, 2020, officers interviewed Relative 3 a second time. He/she admitted that he/she did not tell them the truth the day before. Relative 3 viewed the same still photographs that he/she had previously viewed the day before, and Relative 3 positively identified the suspect in the photographs as STANFORD.