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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : Hon. Mark Falk  
:   
v. : Mag. No. 17-3611  
:   
JAMES M. CHESTNUT : **CRIMINAL COMPLAINT**

I, Adam Storms, 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.

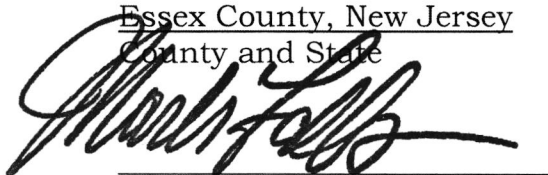


Adam Storms, Special Agent  
Federal Bureau of Investigation

July 6, 2017 at  
Date

Honorable Mark Falk  
United States Magistrate Judge  
Name and Title of Judicial Officer

Essex County, New Jersey  
County and State



Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**  
(Bank Robbery)

On or about June 30, 2017, in Passaic County, in the District of New Jersey, and elsewhere, defendant

JAMES M. CHESTNUT

did, by intimidation and by force and violence, knowingly take from the person and presence of others, namely, employees of TD Bank, located in Paterson, New Jersey, approximately \$700 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) and Section 2.

**COUNT TWO**  
(Bank Robbery)

On or about July 5, 2017, in Passaic County, in the District of New Jersey, and elsewhere, defendant

JAMES M. CHESTNUT

did, by intimidation and by force and violence, knowingly take from the person and presence of others, namely, employees of Investors Bank, located in Clifton, New Jersey, approximately \$3,774 in money belonging to, and in the care, custody, control, management, and possession of Investors Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense did assault a person and put in jeopardy the life of a person by the use of a dangerous weapon and device, that is, a handgun.

In violation of Title 18, United States Code, Section 2113(a), Section 2113(d), and Section 2.

## **ATTACHMENT B**

I, Adam Storms, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with 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 in part. Because this Affidavit 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 June 30, 2017, at approximately 4:02 p.m., an individual, subsequently identified as JAMES M. CHESTNUT ("CHESTNUT"), entered TD Bank, located in Paterson, New Jersey (the "TD Bank"), the deposits of which were then insured by the Federal Deposit Insurance Corporation.

2. CHESTNUT approached a teller ("Victim-1") and handed Victim-1 a note, which stated, in sum and substance, "Put 100s and 50s in the envelope. No dye pack." CHESTNUT also verbally instructed Victim-1, in sum and substance, "Just follow the note."

3. Victim-1 complied and gave CHESTNUT approximately \$700 in United States Currency.

4. On or about July 5, 2017, at approximately 2:48 p.m., an individual, subsequently identified as CHESTNUT, entered Investors Bank, located in Clifton, New Jersey (the "Investors Bank"), the deposits of which were then insured by the Federal Deposit Insurance Corporation.

5. CHESTNUT approached a teller ("Victim-2") and verbally instructed, in sum and substance, "Open your drawer. Give me your money. All the 100s. Don't call the cops or I'll shoot you." CHESTNUT also brandished a gun at Victim-2.

6. Victim-2 complied and gave CHESTNUT approximately \$3,774 in United States Currency.