

Approved: Alvin Flood
ALINE R. FLODR/ SHEB SWETT
Assistant United States Attorneys

Before: THE HONORABLE KEVIN NATHANIEL FOX
United States Magistrate Judge
Southern District of New York

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UNITED STATES OF AMERICA : COMPLAINT
:
- v. - : Violation of 18 U.S.C.
: § 2113(a)
JAMIE FRIERSON, :
: COUNTY OF OFFENSE:
Defendant. : NEW YORK
- - - - - x

SOUTHERN DISTRICT OF NEW YORK, ss.:

Kevin P. Coughlin, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"):

COUNT ONE
(Bank Robbery)

1. On or about August 29, 2017 in the Southern District of New York, JAMIE FRIERSON, the defendant, knowingly, by force and violence, and by intimidation, did take, and attempt to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC"), to wit, FRIERSON obtained money from a bank in Manhattan, by demanding that a bank employee turn over to FRIERSON money in the bank's custody.

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

The bases for my knowledge and for the foregoing charges, are, in part, as follows:

2. I am a Special Agent with the FBI. I am personally involved in the investigation of this matter. This affidavit is based upon my conversations with other law enforcement officers,

my examination of reports and records prepared by law enforcement officers, and my involvement in this investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

The Bank Robbery

3. Based on my personal observations, conversations with other law enforcement officers my review of law enforcement reports, I have learned, in substance and in part, the following:

a. On or about August 29, 2017, at or about 3:03 p.m., a man who has since been identified as JAMIE FRIERSON, the defendant, see infra ¶¶ 5-10, entered a bank ("Bank-1") at 2077 Broadway at the corner of Broadway and 72nd Street in Manhattan, New York, and passed an employee of Bank-1 ("Teller-1") a note which read "I AM ARMED I WILL KILL YOUR HOST IF YOU DON'T GIVE ME ALL MONEY." Teller-1 gave FRIERSON approximately \$8,050 of Bank-1's money and FRIERSON fled.

4. Based on my interview of Teller-1 on August 29, 2017, I have learned, in substance and in part, the following:

a. After providing Teller-1 with the note, JAMIE FRIERSON, the defendant, told Teller-1 in substance and in part: "Come on, don't make it look suspicious".

b. At various points thereafter, FRIERSON told Teller-1 in substance and in part to: (i) "Give me all of your hundreds you have in your drawer"; (ii) "Now give me the fifties"; and (iii) "Come on, give me the twenties."

c. Teller-1 explained that Teller-1 was scared and concerned for the safety of other Bank-1 employees and customers in the vicinity.

FRIERSON is Preliminarily Identified

5. Based on my review of security video footage from Bank-1, I have learned, in substance and in part, the following:

a. The man who robbed Bank-1 appeared to be Black, in his mid-forties, and wore a neon greenish yellow t-shirt, green shorts, dark-rimmed glasses, a silver-faced watch with a black band and a baseball hat. The man also carried a dark-colored backpack.

b. After he fled Bank-1, the man who robbed Bank-1 entered a yellow van taxi in the vicinity of Broadway and 72nd Street in Manhattan at approximately 3:08 p.m.

6. Based on my review of records from the New York City Taxi and Limousine Commission, I have learned, in substance and in part, that the man who entered a yellow van taxi after he fled Bank-1 in the vicinity of Broadway and 72nd Street in Manhattan, appears to have exited that cab in the vicinity of 145th Street and Broadway at approximately 3:26 p.m.

7. Based on my conversation with an employee of a grocery store in the vicinity of 145th Street and Broadway ("Employee-1") on August 30, 2017, and my review of security footage from the grocery store ("Grocery Store") on or about August 29, 2017, I have learned, in substance and in part, the following:

a. The man who robbed Bank-1, appears to have exited the yellow van taxi and entered the Grocery Store at approximately 3:29 p.m. on August 29, 2017.

b. After being shown the photographs contained on a wanted poster of the man who robbed Bank-1, Employee-1 indicated that he recognized the individual and stated that Employee-1 believed the individual lived in a hotel in the vicinity of 145th Street and Broadway.

8. Based on my conversation with an employee of a hotel located on 145th Street between Broadway and Amsterdam Avenue ("Employee-2") on or about August 30, 2017, I have learned, in substance and in part, the following:

a. After being shown the photographs contained on a wanted poster of the man who robbed Bank-1, Employee-2 indicated that she recognized the individual and stated that the individual had been staying in a particular room of the hotel.

FRIERSON Is Arrested

9. Based on my personal observations, conversations with other law enforcement officers and my review of law enforcement reports, I have learned, in substance and in part, the following:

a. On or about August 30, 2017, after Employee-2 had indicated the room in which the man who robbed Bank-1 was staying, law enforcement officers knocked on the door of that hotel room. JAMIE FRIERSON, the defendant, answered the door, and appeared to be the individual depicted in the security video footage from Bank-1 who robbed Bank-1 on August 29, 2017. Law enforcement officers then apprehended FRIERSON.

b. In plain view were, among other things, what appeared to be a pair of green shorts, a silver-faced watch with a black band and at least two dark-colored backpacks.

10. Based on my comparison of viewing JAMIE FRIERSON, the defendant, in person at the hotel with the above-referenced video footage, see supra ¶¶ 5, 7, it appears that FRIERSON is the man who robbed Bank-1.

Federal Deposit Insurance Corporation

11. From my review of publicly available materials, as well as my training and experience as a Special Agent of the FBI, I know that, at all relevant times, the deposits of Bank-1, were insured by the FDIC.

Other Bank Robberies

12. Based on my review of surveillance video footage, my conversations with other law enforcement officers, and my understanding of similarities between the robbery of Bank-1 and other robberies, there is probable cause to believe that six other banks in Manhattan were robbed, between August 16, 2017 and August 29, 2017 by the same person who robbed Bank-1.

WHEREFORE, the deponent respectfully requests that JAIME FRIERSON, the defendant, be imprisoned or bailed, as the case may be.

KEVIN P. COUGHLIN
Special Agent
Federal Bureau of Investigation

Sworn to before me this
__ day of August, 2017

THE HONORABLE KEVIN NATHANIEL FOX
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK