UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Hon. James B. Clark, III.

v.

Mag. No. 15-3115

MICHELLE C. CANTATORE

Criminal Complaint

I, Kenneth G. Terracciano, 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 Kenneth G. Terracciano

Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

March 4, 2015 in New Jersey

HONORABLE JAMES B. CLARK, III. UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

COUNT ONE (Bank Robbery)

On or about February 18, 2015, in Bergen County, in the District of New Jersey and elsewhere, defendant

MICHELLE C. CANTATORE

did knowingly, by force and violence, and by intimidation, take from the person and presence of the employees of Glen Rock Savings Bank, located in Glen Rock, New Jersey, approximately \$112,900.00 in money belonging to, and in the care, custody, control, management, and possession of Glen Rock Savings Bank, a financial institution 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.

ATTACHMENT B

I, Kenneth G. Terracciano, 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 Wednesday, February 18, 2015, at approximately 10:25 a.m. the Glen Rock Savings Bank ("the Bank") at 183 Rock Road, Glen Rock, New Jersey was robbed. According to witnesses and bank surveillance video, the robber appeared to be a white female wearing sunglass, a black coat and white boots. The robber brandished what appeared to be a long barreled handgun. The robber demanded money and threatened to shoot and kill the bank employees if the demand was not met. When the robber was not satisfied with the money she received from the drawer, she directed the bank employees to enter the vault and give her more money. After receiving approximately \$112,900 in United States currency, the robber fled the Bank. Surveillance camera footage shows a white mid-sized SUV leaving the area immediately after the robbery. Approximately a block away from the bank, in the direction the robber fled, law enforcement recovered a paintball gun, specifically a JTER2 pump pistol, wedged next to a pole that matched the description of the handgun used in the robbery.
- 2. During law enforcement's investigation, the following occurred: Cell site records from a cell phone number subscribed to by the defendant Michelle C. Cantatore ("CANTATORE") indicate that the cellphone was in the cell tower sector consistent with the Bank at approximately 10:16 a.m. on February 18, 2015. Cell site records also indicate that the cellphone was in the cell tower sector consistent with the Borgata Casino in Atlantic City, New Jersey at 6:35 p.m. on February 18, 2015. Footage from surveillance cameras located near the Glen Rock Saving Bank show a white mid-sized SUV leaving the area immediately after the bank robbery. A search of the records from Department of Motor Vehicles indicates that a white Cayenne Porsche ("the Porsche"), is registered to CANTATORE'S father. Further, records indicate that CANTATORE has used the Porsche in the past because she was previously stopped in it by law enforcement in May 2014. Photographs obtained from the Borgata Casino show CANTATORE handing two large stacks of cash to the Borgata Casino cashier at approximately 6:53 p.m. on February 18,

- 2015. She is seen holding a handbag similar to the bag used by the robber in the Bank robbery.
- 3. On or about January 30, 2105, an additional robbery was committed by a robber matching the physical description of CANTATORE.
- 4. CANTATORE'S cell phone also was in the cell tower sector of the January 30, 2015 bank robbery near the time of the robbery.
- 5. At all times relevant to this Complaint, the deposits of the banks were insured by the Federal Deposit Insurance Corporation.