

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

MAY 11 2010

CLAIRE C. CECCHI, U.S.M.J.

UNITED STATES OF AMERICA	:	
v.	:	
ISRAEL COSME	:	Hon. Claire C. Cecchi
	:	Mag No. 10-4070 (CCC)
	:	CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief. On or about May 4, 2010, in Union County, in the District of New Jersey and elsewhere, defendant ISRAEL COSME did:


knowingly, by force and violence, and by intimidation, take and attempt to take from the person and presence of another, namely a bank teller of TD, approximately \$3,950.00 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).

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 A

continued on the attached page and made a part hereof.

  
 \_\_\_\_\_  
 Ajit David, Special Agent  
 Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
May 11, 2010, at Newark, New Jersey

HONORABLE CLAIRE C. CECCHI  
UNITED STATES MAGISTRATE JUDGE

  
 \_\_\_\_\_  
 Signature of Judicial Officer

## Attachment A

I, Ajit David, am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have knowledge of the following facts based upon my investigation, review of reports and discussions with other law enforcement personnel and others. All statements herein are set forth in substance and in part:

1. On or about April 28, 2010, at approximately 10:45 a.m., an individual later identified as defendant ISRAEL COSME (hereinafter "COSME"), entered TD Bank, located at 570 Chestnut Street, Union, Union County, New Jersey. Defendant COSME presented the teller with a written note threatening that he had a gun and demanding money. The teller gave Defendant COSME an unknown sum of cash and Defendant COSME exited the bank. After exiting the bank, a dye pack hidden in the cash exploded and Defendant COSME dropped the money and fled the scene. The bank's video surveillance camera recorded the incident. In addition, a fingerprint was found on the door to the bank. Forensic analysis by Union Police Department later identified the fingerprint as belonging to Defendant COSME.

2. On the same day, on or about April 28, 2010, approximately one-half hour later, at 11:16 a.m., an individual later identified as Defendant COSME entered Chase Bank, located at 700 East 1<sup>st</sup> Avenue, Roselle, Union County, New Jersey. Defendant COSME presented the teller with a written note threatening that he had a gun and demanding money. The teller gave Defendant COSME approximately \$3,000 in cash. Defendant COSME took the cash and fled. The bank's video surveillance camera recorded the incident.

3. On or about May 4, 2010, at approximately 1:54 p.m., an individual later identified as Defendant COSME entered TD Bank, located at 1071 St. George Avenue, Rahway, Union County, New Jersey. Defendant COSME presented the teller with a written note threatening that he had a gun and demanding money. When the teller reached to open the money drawer instead of handing Defendant COSME the money laying on the counter, Defendant COSME told her, in substance and in part, "No, I really have a gun." Defendant COSME then grabbed the money on the counter (a sum of approximately \$3,950 in cash) and fled. The bank's video surveillance camera recorded the incident. In addition, a fingerprint was found on the bank counter. Forensic analysis by Rahway Police Department later identified the fingerprint as belonging to Defendant COSME.

4. On or about May 5, 2010, United States Probation Officer Luis Gonzalez reviewed portions of the video surveillance

from the April 28, 2010 TD Bank and Chase Bank robberies and positively identified the individual seen on the video as Defendant COSME.

5. At all times relevant to this Complaint, the deposits of TD Bank (located at 570 Chestnut Street, Union, Union County, New Jersey), Chase Bank (located at 700 East 1<sup>st</sup> Avenue, Roselle, Union County, New Jersey), and TD Bank (located at 1071 St. George Avenue, Rahway, Union County, New Jersey) were insured by the Federal Deposit Insurance Company.