
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA :
v. :
ROBERT K. MARTIN : Hon. Michael A. Shipp
: Mag No. 10-7083 (ES)
: 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 Hudson County, in the District of New Jersey and elsewhere, defendant ROBERT K. MARTIN did:

knowingly, by force and violence, and by intimidation, attempted to take from the person and presence of another, namely a bank teller of Oritani Bank, money belonging to, and in the care, custody, control, management, and possession of, Oritani 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).

On or about May 11, 2010, in Bergen County, in the District of New Jersey and elsewhere, defendant ROBERT K. MARTIN did:

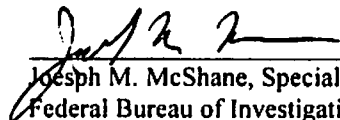
knowingly, by force and violence, and by intimidation, take from the person and presence of another, namely a bank teller of Sovereign Bank, approximately \$510,293 belonging to, and in the care, custody, control, management, and possession of, Sovereign Bank the deposits of which were then insured by 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.



Joseph M. McShane, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
May 21, 2010, at Newark, New Jersey

HONORABLE MICHAEL A. SHIPP
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Office

Attachment A

I, Joseph M. McShane, 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 videos and discussions with other law enforcement personnel and others. All statements herein are set forth in substance and in part:

1. On or about Tuesday, April 13, 2010, at approximately 7:46 p.m., an individual entered TD Bank, located at 4200 Park Avenue, Weehawken, Hudson County, New Jersey. The individual presented the teller with a written note demanding money. The teller gave the individual approximately \$1,149.25. The bank's video surveillance camera recorded the incident. The individual was a white male, approximately 6', wearing a fake beard, latex gloves, green jacket, white shirt, grey pants, white shoes, black baseball cap, sunglasses, with a single headphone in his ear.

2. On or about Tuesday, April 20, 2010, at approximately 8:04 a.m., an individual entered Oritani Bank, 1020 Summit Avenue, Union City, Hudson City, New Jersey. The individual repeatedly banged on the teller counter window and repeatedly demanded money. The teller turned over approximately \$2,147. Included were \$100 in bail bills, in \$10 denominations. The bank's video surveillance camera recorded the incident. The individual was a white male, approximately 6', beard, surgical gloves, dark jacket, black baseball cap, glasses, with a single headphone in his ear.

3. On or about Tuesday, May 4, 2010, at approximately 8:26 a.m., an individual entered Oritani Bank, 1020 Summit Avenue, Union City, Hudson City, New Jersey. The tellers identified the individual as the April 20, 2010 bank robber and went into the employee area behind the safety glass and locked the door. The individual then waved a silver revolver and demanded money and access to the vault. The individual was unsuccessful in obtaining any money. The bank's video surveillance camera recorded the incident. The individual was a white male, approximately 6', wearing a fake beard, surgical gloves, cream sweater, black baseball cap, and glasses. Two witnesses observed an old model burgundy four-door vehicle leave the area after the bank robbery.

4. On or about May 11, 2010, at approximately 9:05 a.m., an individual entered Sovereign Bank, 65 River Road, North Arlington, Bergen County, New Jersey. The individual announced he was robbing the bank and displayed a silver revolver. The individual rounded up three bank employees and two customers and ordered them to the teller entrance. The individual made the head teller open the door, and then demanded entry to the vault. The individual obtained the vaults contents as well as money from the teller drawers, totaling approximately \$510,293. The money was placed in a green garment bag that he carried into the store. The bank's video surveillance camera recorded the incident. The individual was a white male, approximately 6', wearing a fake beard, surgical gloves, a white baseball cap, white sneakers, blue denim jacket, blue jeans, and sunglasses. A nearby surveillance camera captured an older model black two-door blazer SUV park near the rear of the bank before the robbery.

5. On or about May 12, 2010, the two-door blazer SUV was found burned out in a remote location in Kearney, New Jersey, and was previously stolen from North Arlington, New Jersey on or about May 7, 2010. The son of the vehicles owner positively identified the SUV from the surveillance photo. The car's license plate had been previously checked by police on or about May 8, 2010 when it was parked in the vicinity of 41 Johnston Avenue, Kearney, New Jersey. As a result, video surveillance footage of the area was recovered, showing the front door and surrounding area of 41 Johnston Avenue, the home of ROBERT K. MARTIN, currently serving a period of federal supervised release for bank robbery. From on or about September 2002 until May 2003, ROBERT K. MARTIN confessed to committing seven bank robberies in New Jersey, three of which were in Union City, New Jersey. During those robberies, ROBERT K. MARTIN acknowledged the use of a police scanner to facilitate the bank robberies.

6. The surveillance video from May 4, 2010 showed a man fitting ROBERT K. MARTIN'S description and the description of the Oritani Bank robber, leave from the front door of 41 Johnston Avenue, and drive away in a late model burgundy four-door sedan at approximately 7:14 a.m., with a damaged right rear window and missing right front wheel hubcap. The attempted bank robbery at Oritani Bank occurred at approximately 8:26 a.m. The same car then returned at approximately 9:00 a.m., with the driver entering the front door of 41 Johnston Avenue. On or about May 6, 2010, the burgundy four-door was recovered in Kearney, New Jersey, and was reported stolen on April 19, 2010 from Kearney, New Jersey. The burgundy four-door recovered on or about May 6, 2010, also had a damaged right rear window and was missing the hubcap on its right front wheel.

7. The surveillance video from May 11, 2010 showed a man fitting ROBERT K. MARTIN'S description, and the description of the Sovereign Bank robber, leave from the front door of 41 Johnston Avenue, and drive away in a black old model two-door blazer SUV at approximately 8:52 a.m. The Sovereign Bank robbery occurred at approximately 9:05 a.m. The same car the returned at approximately 9:22 a.m., with the driver entering the front door of 41 Johnston Avenue, carrying a large bag over his shoulder.

8. ROBERT K. MARTIN is a white male, approximately 6', 180 lbs, has brown hair, and is 39 years old.

9. At all times relevant to this Complaint, the deposits of TD Bank (located at 4200 Park Avenue, Weehawken, Hudson County, New Jersey), Oritani Bank (located at 1020 Summit Avenue, Union City, Hudson City, New Jersey), Sovereign Bank (located at 65 River Road, North Arlington, Bergen County, New Jersey) were insured by the Federal Deposit Insurance Company.