

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Brandon T. Amerine, do hereby depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (“FBI”) and have been so employed for approximately one and a half years. I am currently assigned to the Boston Division of the FBI in Boston, Massachusetts. More specifically, I am assigned to the Boston FBI Violent Crimes Task Force (“VCTF”), which comprises personnel of the FBI, Massachusetts State Police, and the Boston, Dedham, Malden, Saugus, and Somerville Police Departments.

2. As a Special Agent with the FBI VCTF, I have responded to numerous bank robberies. Additionally, I have received specialized training regarding investigative techniques, evidence collection, and evidence preservation.

3. Throughout my employment with the FBI, I have participated in investigations involving the execution of arrest warrants.

4. I am aware that Title 18 of the United States Code, Section 2113(a) makes it a crime for anyone by force and violence, or by intimidation, to take, or attempt to take, from the person or presence of another, any property or money or any other thing of value belonging to, or in the care of, custody, control, management, or possession of, any federally insured bank.

5. Based on this, I am submitting this affidavit in support of a criminal complaint charging Angel R. Robles (“Robles”), DOB 12/03/1974, with robbery in violation of 18 U.S.C. § 2113(a). On the date of this robbery, the Citizen’s Bank deposits were insured by the Federal Deposit Insurance Corporation.

6. The facts stated herein are based on my own personal knowledge, as well as information provided to me by witnesses and other law enforcement involved in the

investigation. In submitting this affidavit, however, I have not included every fact known to me about this investigation, but only the facts which I believe are enough to establish the requisite probable cause.

INVESTIGATION

7. According to information provided by personnel with Citizen's Bank at 97 Lowell Road, Concord, Massachusetts ("the Bank"), on November 9, 2020 at approximately 2:48pm, an individual ("the robber") wearing a baseball cap with a Batman logo entered through the front entrance of a branch of the Bank. The individual approached the teller's window and handed a note to the teller that read: "ROBBERY! 10,000 – (100's) ONLY READY TO DIE ON A DEATH WISH! FUKIN TRY ME I WILL OPEN FIRE ON YOU & PUBLIC 3 MINS/YOUR CHOICE". The robber then stated to the teller, words to the effect, if you don't give me the money in two minutes, I will put a fucking bullet in your head. The teller then removed currency from her drawer and placed the currency on the counter. At this time the robber dropped a wipe that he had in his hand and took the currency from the counter before exiting the Bank.

8. A post-robbery audit by the Bank determined that the robber had taken \$383.97 in United States currency during the robbery.

9. Following the robbery, the teller was interviewed by the Concord Police Department. The teller described the robber as a Hispanic male who spoke with a Spanish accent, approximately 5'8" tall, slim build, approximately 20-30 years old, wearing a black/gray baseball cap with a Batman logo, dark colored mask, dark sunglasses, dark colored long sleeved polo shirt, and light colored stonewashed jeans. The teller also stated she saw a firearm in the robber's waistline near the small of his back. Additionally, I watched the video and observed the robber holding white items (that appeared to be wipes) in his hand. At that point the video shows

the wipes being dropped to the floor as the robber goes to grab the money from counter and exit the bank.

10. On November 9, 2020, Massachusetts State Police (“MSP”) Crime Scene Unit also responded to the Bank. At this time MSP recovered, and took custody of the robbery demand note and a paper towel wet wipe left behind by the robber. On November 10, 2020, MSP submitted this evidence to the laboratory for examination.

11. Later on November 9, 2020, an employee of the Trails End Café (“the café”) located at 97 Lowell Road, Concord, MA allowed the FBI VCTF and the Concord Police Department to view their building’s security footage in the area of the bank robbery. Surveillance footage from the café showed a large U-Haul moving truck (“the truck”) with identification number TT6910E pull into the parking lot in front of the café at approximately 15:58 as seen on the café’s time stamp. After conversion for their time offset, it was determined that an individual parked the truck around 2:38 p.m. on November 9, 2020.

12. The cafe video reveals that the individual who was driving the truck was a male with a mustache and wearing a dark colored baseball cap. The individual parked, exited the truck, pulled a dark colored mask over his face, and walked towards the entrance of the Bank. The individual who exited the truck matched the description of the robber given by the teller. The café’s surveillance footage depicted the same individual, believed to be the robber, run back to his truck from the direction of the Bank, enter the truck, and drive away towards Lowell Road at approximately 2:48pm.

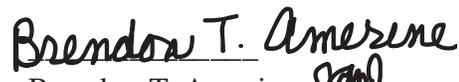
13. On November 10, 2020, I learned that the MSP Crime Scene unit received a positive result for latent prints from the paper towel wet wipe they recovered from the Bank. I learned the print came back to Angel R. Robles (“ROBLES”), date of birth, 12/03/74. Robles

had a prior federal conviction for armed bank robbery from 2008 and was also listed as a main subject for numerous other FBI bank robbery investigations.

14. On November 12, 2020, I was informed that ROBLES was arrested by Massachusetts State Police for receiving a stolen motor vehicle, under Massachusetts G.L. c. 266, S 28-F. FBI VCTF responded to the incident and conducted a custodial interview of Robles regarding the November 9, 2020 bank robbery of Citizens Bank located at 97 Lowell Road, Concord, MA. FBI VCTF agents read ROBLES his Miranda Rights and ROBLES agreed to speak with them. During this conversation, ROBLES confessed to robbing the Citizens Bank, located at 97 Lowell Road, Concord, MA on November 9, 2020.

CONCLUSION

15. Based on the foregoing, I believe there is probable cause to believe that Angel R. Robles, by force and violence, and by intimidation, took from the person or presence of another, money in the care, custody, control, management, and possession of the Citizen's Bank on November 9, 2020., in violation of 18 U.S.C. § 2113(a).


Brandon T. Amerine
Federal Bureau of Investigation
Special Agent

Subscribed and sworn to telephonically in accordance with Federal Rule of Criminal Procedure 4.1 on November 19, 2020.


Honorable Judith G. Dein
United States Magistrate Judge