
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
v. : Mag. No. 20-1172
TYLER O'TOOLE :

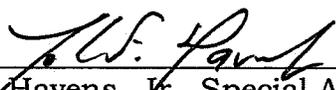
I, John F. Havens, Jr., being duly sworn, state the following is true and correct to the best of my knowledge and belief:

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

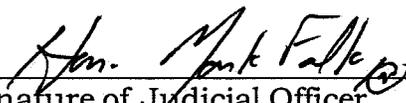
continued on the attached page and made a part hereof.



John F. Havens, Jr., Special Agent
Federal Bureau of Investigation

Attested to by telephone pursuant to
Fed. R. Crim. P. 4.1(b)(2)(A) on November 4, 2020
in the District of New Jersey

HONORABLE MARK FALK
United States Magistrate Judge



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE
(Bank Robbery)

On or about October 8, 2020, in Morris County, in the District of New Jersey, and elsewhere, the defendant,

TYLER O'TOOLE,

did, by force, violence, and intimidation, knowingly take from the person and presence of others, namely, employees of PNC Bank located in Morris Plains, New Jersey, approximately \$6,250 in money belonging to, and in the care, custody, control, management, and possession of the Morris Plains PNC Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

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

COUNT TWO
(Attempted Bank Robbery)

On or about October 8, 2020, in Morris County, in the District of New Jersey and elsewhere, the defendant,

TYLER O'TOOLE,

did, by force, violence, and intimidation, knowingly attempt to take from the person and presence of others, namely, employees of PNC Bank located in Pompton Plains, New Jersey, money belonging to, and in the care, custody, control, management, and possession of the Pompton Plains PNC Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

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

COUNT THREE
(Bank Robbery)

On or about October 22, 2020, in Monmouth County, in the District of New Jersey and elsewhere, the defendant,

TYLER O'TOOLE,

did, by force, violence, and intimidation, knowingly take from the person and presence of others, namely, employees of Chase Bank located in Aberdeen, New Jersey, approximately \$2,910 in money belonging to, and in the care, custody, control, management, and possession of the Aberdeen Chase Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

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

COUNT FOUR
(Bank Robbery)

On or about October 22, 2020, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

TYLER O'TOOLE,

did, by force, violence, and intimidation, knowingly take from the person and presence of others, namely, employees of Bank of America located in East Windsor, New Jersey, approximately \$13,000 in money belonging to, and in the care, custody, control, management, and possession of the East Windsor Bank of America, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

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

COUNT FIVE
(Bank Robbery)

On or about October 27, 2020, in Mercer County, in the District of New Jersey and elsewhere, the defendant,

TYLER O'TOOLE,

did, by force, violence, and intimidation, knowingly take from the person and presence of others, namely, employees of Chase Bank located in Lawrence Township, New Jersey, approximately \$1,850 in money belonging to, and in the care, custody, control, management, and possession of the Lawrence Township Chase Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

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

COUNT SIX
(Bank Robbery)

On or about October 27, 2020, in Burlington County, in the District of New Jersey and elsewhere, the defendant,

TYLER O'TOOLE,

did, by force, violence, and intimidation, knowingly take from the person and presence of others, namely, employees of Citizens Bank located in Mount Holly, New Jersey, approximately \$1,871 in money belonging to, and in the care, custody, control, management, and possession of the Mount Holly Citizens Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

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

COUNT SEVEN
(Attempted Bank Robbery)

On or about October 30, 2020, in Camden County, in the District of New Jersey and elsewhere, the defendant,

TYLER O'TOOLE,

did, by force, violence, and intimidation, knowingly attempt to take from the person and presence of others, namely, employees of Citizens Bank located in Runnemede, New Jersey, money belonging to, and in the care, custody, control, management, and possession of the Runnemede Citizens Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation.

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

ATTACHMENT B

I, John F. Havens, Jr., am a Special Agent with the Federal Bureau of Investigation and I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because 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 August 20, 2020, TYLER O'TOOLE ("O'TOOLE) and another individual were arrested in Glenview, Illinois in connection with a bank robbery that occurred that day. The next day, O'TOOLE and the other individual were charged in a federal criminal complaint in the Northern District of Illinois, Eastern Division (Case 20-CR-00535) with one count of bank robbery, in violation of 18 U.S.C. § 2113(a). The complaint alleges that on August 20, 2020, O'TOOLE and another individual robbed a bank located inside a grocery store in Glenview, Illinois.

2. On or about August 21, 2020, O'TOOLE's initial appearance was held in the Northern District of Illinois, Eastern Division, at which time he was released on an appearance bond with conditions, including home detention with location monitoring.

3. On or about September 24, 2020, an arrest warrant was issued for O'TOOLE in the Northern District of Illinois, Eastern Division, after he removed his location monitoring device, stole his mother's blue 2018 Hyundai Elantra bearing Ohio license plates (the "Elantra"), and drove away from his parents' residence, where he had been living while on home detention.

October 8, 2020 – PNC Bank, Morris Plains, NJ

4. On or about October 8, 2020, at approximately 12:20 p.m., O'TOOLE, wearing a Los Angeles Kings baseball hat, a blue face mask, a blue and black long-sleeved shirt, and black pants, entered the PNC Bank located in the Stop and Shop grocery store on Littleton Road in Morris Plains, New Jersey (the "Morris Plains PNC Bank").

5. O'TOOLE approached the counter and passed the teller a note that stated that he wanted money in an envelope, and not to put an ink pack in the envelope. The teller complied, placing approximately \$6,250 in United States currency into an envelope and handing it to O'TOOLE. O'TOOLE then walked out of the Morris Plains PNC Bank and into the parking lot.

6. Bank security recovered images from the robbery that show O'TOOLE wearing the aforementioned clothing. The images also show that O'TOOLE fled the area of the Morris Plains PNC Bank in what appeared to be the Elantra.

October 8, 2020 – PNC Bank, Pompton Plains, NJ

7. On or about October 8, 2020, at approximately 1:00 p.m., O'TOOLE, wearing a Los Angeles Kings baseball hat, a blue face mask, a blue and black long-sleeved shirt, black pants, and gray and white sneakers, entered the PNC Bank located in the Stop and Shop grocery store on Route 23 in Pompton Plains, New Jersey (the "Pompton Plains PNC Bank").

8. O'TOOLE approached the counter and held up a manila envelope that displayed writing stating that this was a robbery. O'TOOLE then put the envelope in his pocket and stood off to the side of the counter.

9. O'TOOLE waited for a short time, but the teller did not give him any money. O'TOOLE stated that he was in a rush, and then walked out of the Pompton Plains PNC Bank and into the parking lot.

10. Bank security recovered images from the attempted robbery that show O'TOOLE wearing the aforementioned clothing. The images also show that O'TOOLE fled the area of the Pompton Plains PNC Bank in what appeared to be the Elantra.

October 22, 2020 – Chase Bank, Aberdeen, NJ

11. On or about October 22, 2020, at approximately 10:36 a.m., O'TOOLE, wearing a black baseball hat, a black face mask, a gray long-sleeved shirt, dark sweatpants, and gray and white sneakers entered the Chase Bank located in the ShopRite grocery store on Lloyd Road in Aberdeen, New Jersey (the "Aberdeen Chase Bank").

12. O'TOOLE approached the counter and passed the teller a manila envelope on which the following was written in black marker:

- This is a robbery. Comply and Nobody gets hurt.
- Give me 20's 50's 100's
- NO Trackers or Ink Packs
- Put money in this envelope
- Be fast, Act Normal

13. The teller complied, placing approximately \$2,910 in United States currency into an envelope and handing it to O'TOOLE. O'TOOLE then walked out of the Aberdeen Chase Bank and into the parking lot.

14. Bank security recovered images from the robbery that show O'TOOLE wearing the aforementioned clothing. The images also show that O'TOOLE fled the area of the Aberdeen Chase Bank in what appeared to be the Elantra, which now displayed a Texas temporary license plate (the "Texas Temporary Plate").

October 22, 2020 – Bank of America, East Windsor, NJ

15. On October 22, 2020, at approximately 11:19 a.m., O'TOOLE, wearing a black baseball hat, a black face mask, a gray long-sleeved shirt, dark pants, and gray and white sneakers entered the Bank of America located in the ShopRite grocery store on Route 130 North in East Windsor, New Jersey (the "East Windsor Bank of America").

16. O'TOOLE approached the counter and passed the teller a manila envelope that displayed writing stating that this was a robbery and demanding money with no dye packs or GPS technology.

17. The teller complied, placing approximately \$13,000 in United States currency into the manila envelope and handing it to O'TOOLE. O'TOOLE then walked out of the East Windsor Bank of America and into the parking lot.

18. Bank security recovered images from the robbery that show O'TOOLE wearing the aforementioned clothing. The images also show that O'TOOLE fled the area of the East Windsor Bank of America in what appeared to be the Elantra, which displayed the Texas Temporary Plate.

October 27, 2020 – Chase Bank, Lawrence Township, NJ

19. On or about October 27, 2020, at approximately 12:10 p.m., O'TOOLE, wearing a gray knitted hat, a dark face mask, a dark hooded jacket, and gray sweat pants, entered the Chase Bank located in the ShopRite grocery store on Brunswick Pike in Lawrence Township, New Jersey (the "Lawrence Township Chase Bank").

20. O'TOOLE approached the counter and passed the teller a manila envelope on which the following was written in black marker:

- This is a robbery. Comply and Nobody gets hurt.
- Give me 20's 50's 100's
- NO Trackers or Ink Packs
- Put Money in THIS Envelope
- Be fast, Act Normal

21. The teller complied, giving O'TOOLE approximately \$1,850 in United States currency. O'TOOLE then attempted to lunge over the Plexiglas divider to grab the manila envelope, but was unsuccessful. O'TOOLE then moved to another teller and demanded additional money, but the teller stated that he/she had no money in his/her register. O'TOOLE then walked out of the Lawrence Township Chase Bank and into the parking lot.

22. Bank security recovered images from the robbery that show O'TOOLE wearing the aforementioned clothing. The images also show that O'TOOLE had arrived to the area of the Lawrence Township Chase Bank in what appeared to be the Elantra, which displayed the Texas Temporary Plate. The images also show O'TOOLE's unmasked face through the windshield of the car.

October 27, 2020 – Citizens Bank, Mount Holly, NJ

23. On or about October 27, 2020, at approximately 12:55 p.m., O'TOOLE, wearing a gray knitted hat, a dark face mask, a black hooded sweatshirt, gray pants, and gray and white sneakers entered the Citizens Bank located in the Acme grocery store on High Street in Mount Holly, New Jersey (the "Mount Holly Citizens Bank").

24. O'TOOLE approached the counter and showed the teller a manila envelope that had a demand for money written on it in black marker.

25. The teller complied, giving O'TOOLE approximately \$1,871 in United States currency. O'TOOLE then walked out of the Mount Holly Citizens Bank and into the parking lot.

26. Bank security recovered images from the robbery that show O'TOOLE wearing the aforementioned clothing. The images also show that O'TOOLE fled the area of the Mount Holly Citizens Bank in what appeared to be the Elantra.

October 30, 2020 – Citizens Bank, Runnemede, NJ

27. On or about October 30, 2020, at approximately 11:42 a.m., O'TOOLE, wearing a black beanie, a black face mask, and a black jacket, entered the Citizens Bank located in the Acme grocery store on Evesham Road in Runnemede, New Jersey (the "Runnemede Citizens Bank").

28. O'TOOLE approached the counter and showed the teller ("Teller-1") a manila envelope that displayed writing stating that this was a robbery and demanding money.

29. At that point, another teller ("Teller-2") approached O'TOOLE and asked if he/she could help O'TOOLE. O'TOOLE stated that he wanted to withdraw \$5,000 from his savings account, and Teller-2 responded by asking for his debit card. O'TOOLE replied that Teller-1 had taken his card.

30. O'TOOLE then walked over to a customer who had just withdrawn \$1,000 in United States currency from his/her bank account. O'TOOLE struck the customer several times with a closed fist and unsuccessfully attempted to take the currency from the customer. O'TOOLE then walked out of the Runnemede Citizens Bank and into the parking lot.

31. Bank security recovered images from the robbery that show O'TOOLE wearing the aforementioned clothing. The images also show that O'TOOLE fled the area of the Runnemede Citizens Bank in what appeared to be the Elantra.