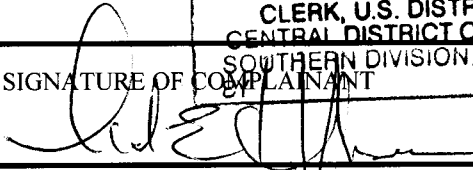
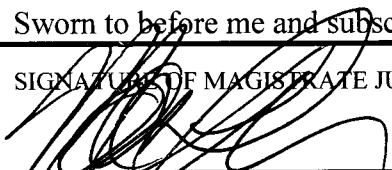


ORIGINAL

CRIMINAL COMPLAINT

UNITED STATES DISTRICT COURT		CENTRAL DISTRICT OF CALIFORNIA	
UNITED STATES OF AMERICA v. FRANK DARRYL HOLDER		Docket No.	
		MAGISTRATE'S CASE NO. SA08-633 M	
Complaint for violation of Title 18 United States Code §§ 2113(a)(d), 924(c)			
NAME OF MAGISTRATE JUDGE MARC L. GOLDMAN		UNITED STATES MAGISTRATE JUDGE	LOCATION Santa Ana, California
DATE OF OFFENSE October 29, 2008	PLACE OF OFFENSE San Bernardino County	Address of ACCUSED (IF KNOWN)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: On or about October 29, 2008, in San Bernardino County, within the Central District of California, defendant FRANK DARRYL HOLDER committed armed robbery of the Bank of America located at 11570 4 th Street, Rancho Cucamonga, California, by use of force, violence and/or intimidation, in violation of Title 18, United States Code, Sections 2113(a)(d), 924(c). In doing so, defendant FRANK DARRYL HOLDER took approximately \$2,546 belonging to the Bank of America, the deposits of which were then insured by the Federal Deposit Insurance Corporation.			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: (See attached affidavit which is incorporated as part of this Complaint)		<div style="border: 2px solid black; padding: 5px; text-align: center;"> <p>FILED</p> <p>OCT 31 2008</p> </div> <p>CLERK, U.S. DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA SOUTHERN DIVISION AT SANTA ANA DEPUTY</p>	
MATERIAL WITNESSES IN RELATION TO THIS CHARGE:			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		SIGNATURE OF COMPLAINANT  CHAD HOFFMAN, SPECIAL AGENT FEDERAL BUREAU OF INVESTIGATION	
Sworn to before me and subscribed in my presence,			
SIGNATURE OF MAGISTRATE JUDGE(1)  MARC L. GOLDMAN		DATE: October 31, 2008	

1) See Federal Rules of Criminal Procedure rules 3 and 54.

AFFIDAVIT

I, Chad E. Hoffman, being duly sworn, hereby depose and say:

1. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI") assigned to the Riverside Resident Agency for the Los Angeles Division. I have been a SA for approximately two years. I am currently assigned to the investigation of violent crimes including bank robbery.

I.

PURPOSE OF AFFIDAVIT

2. I respectfully submit this affidavit in support of an application for a for a complaint charging FRANK DARRYL HOLDER ("HOLDER") with armed robbery of Bank of America, located at 11570 4th Street, Rancho Cucamonga, California, on October 29, 2008, in violation of Title 18, United States Code, Section 2113 (a)(d), 924(c).

3. Because this Affidavit is being submitted for the limited purpose of establishing probable cause for a complaint and arrest warrant, I have not included every detail of every aspect of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause. The information contained in this Affidavit is based upon conversations with other law enforcement officers and others, my review of various documents and records, and, where specified, my personal observations and knowledge. Unless specifically indicated, all conversations and statements described in this

Affidavit are related in substance and in part only.

II.

THE INVESTIGATION

4. On October 29, 2008, I responded to a robbery at Bank of America, 11570 4th Street, Rancho Cucamonga, California, ("the bank") and conducted the following investigation:

a. I interviewed Cynthia Erika Jimenez ("Jimenez") who told me the following:

i. Jimenez is employed as a teller at the bank and was working at her teller station on October 29, 2008.

ii. At approximately 4:35 p.m., a white male (later identified as HOLDER) walked up to her counter and opened a beige bag and told her, "put everything you have, top and bottom drawer into the bag." She placed approximately \$2,500.00 including bait/dye pack into the bag. The white male grabbed the bag with the money turned and walked out the front door.

iii. Jimenez described the person who robbed her as a white male, 50-60 years old, between 5'7" - 6" tall, 220 pounds, thick white mustache, wearing sunglasses, a white baseball cap, a white short-sleeve, button shirt and khaki pants.

b. I interviewed Nancy Prado ("Prado"), Assistant Manager of the bank, who told me the following:

i. The bank is federally insured by the Federal Deposit Insurance Corporation.

ii. The bank sustained a loss of \$2,546.00 in

United States currency, including a dye pack.

iii. Prado observed the robber leave the bank and saw the dye pack explode before the robber got into a small tan colored pickup truck and drive off heading north on Buffalo street.

iv. Prado described the robber as a white male, in his 50s, with white/grey hair, wearing khaki pants, a white short sleeve shirt, brown shoes, and a white baseball cap.

c. Prado provided a description of the robber and his vehicle to a 911 operator after the robbery.

5. I spoke with Detective Phil Dupper ("Dupper") of the San Bernardino County Sheriff's Department, Rancho Cucamonga Station, Rancho Cucamonga, California. Dupper informed me that Frank Darryl HOLDER had been arrested for robbing the Bank of America, 11570 4th Street, Rancho Cucamonga, California. Dupper told me that deputies had arrested HOLDER and found the stolen money in HOLDER's truck. The arrest took place at the intersection of Whittram and Ilex in Rancho Cucamonga after receiving descriptive information regarding the bank robber and the getaway vehicle from a 911 call placed by the assistant manager from the Bank of America. At the time of his arrest, HOLDER's clothes and arms where stained with red dye from the dye pack. Det. Dupper told me that Cynthia Jimenez and Nancy Prado had both positively identified HOLDER as the person who robbed Jimenez.

6. On October 29, 2008, I spoke with HOLDER.

a. I advised HOLDER of his Miranda rights.

b. After waiving those rights HOLDER told me the following:

i. He robbed Bank of America, 11570 4th Street, Rancho Cucamonga, California.

ii. He parked his truck in the bank's parking lot and entered the bank. He walked up to a counter which had a female teller. He placed a bag on the counter and told the teller to "fill up the bag with bills from the top and bottom drawers."

iii. He had a Springfield .45 caliber automatic pistol in a holster on his belt under his shirt.

iv. After receiving the money, he grabbed the bag, turned, and walked out the front door of the bank. He got into his truck and drove out of the parking lot. He drove several blocks before he was arrested.

iv. HOLDER also admitted to committing three other bank robberies, specifically two robberies in Escondido, and one robbery in Glendora, California.

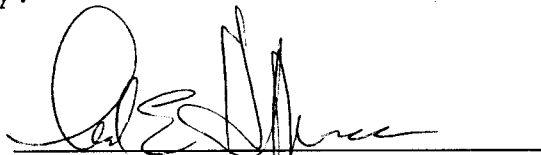
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III.

CONCLUSION

7. Based on the facts stated herein and on my experience and training, I submit there is probable cause to believe that FRANK DARRYL HOLDER violated Title 18, United States Code, Section 2113 (a) (d), Armed Bank Robbery, 924(c) Use of a Firearm in Commission of a Felony.



Chad E. Hoffman
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to me

this 31st day of October, 2008



THE HONORABLE MARC L. GOLDMAN
UNITED STATES MAGISTRATE JUDGE