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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

CASE NUMBER: 1:21-cr-00107

v.

FALANDIS RUSSELL and
TERRANCE WILLIAMS

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. Beginning on or about July 31, 2020 and continuing until on or about January 22, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendants violated:

Code Section

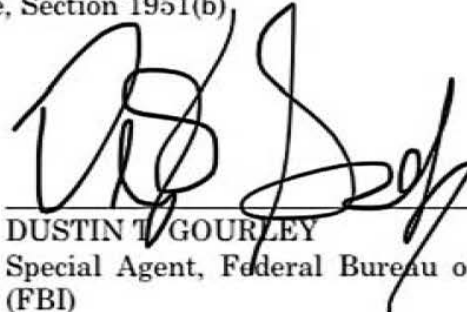
Offense Description

Title 18, United States Code, Section 1951(a)

conspired to obstruct, delay, and affect interstate commerce, and the movement of articles and commodities in commerce, by robbery, as "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b).

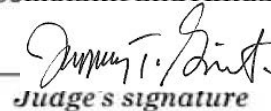
This criminal complaint is based upon these facts:

X Continued on the attached sheet.


DUSTIN T. GOURLEY
Special Agent, Federal Bureau of Investigation
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: February 12, 2021 _____



Judge's signature

City and state: Chicago, Illinois _____

JEFFREY T. GILBERT, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, DUSTIN T. GOURLEY, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since approximately April 2012. My current responsibilities include the investigation of violent crimes, including, among others, kidnaping, bank robbery, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that FALANDIS RUSSELL and TERRANCE WILLIAMS have violated Title 18, United States Code, Section 1951(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging RUSSELL and WILLIAMS with conspiring to obstruct, delay, and affect interstate commerce, and the movement of articles and commodities in commerce, by robbery, as "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b), I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, my review of security camera recordings,

body-worn camera recordings, information provided by Facebook, and the results of the execution of court-authorized search warrants.

Background of the Investigation

4. As set forth in more detail below, beginning on July 31, 2020, and continuing until January 22, 2021, Falandis RUSSELL and Terrence WILLIAMS conspired to commit, and committed, a series of armed robberies of the following commercial businesses:

- Victim Shop A, 1841 River Oaks Drive, Calumet City, Illinois (July 31, 2020, 4:41 p.m.);
- Victim Shop D, 6153 S. Archer St., Summit, Illinois (August 10, 2020, 6:52 p.m.);
- Victim Shop E, 4558 S. Cicero Ave., Chicago, Illinois (August 10, 2020, 7:07 p.m.);
- Victim Shop G, 8300 S. Cicero Ave., Burbank, Illinois (August 28, 2020, 2:14 p.m.);
- Victim Shop H, 6337 S. Kedzie, Chicago, Illinois (August 28, 2020, 2:50 p.m.);
- Victim Shop K, 643 E. Boughton Rd., Bolingbrook, Illinois (September 25, 2020, 12:23 p.m.);
- Victim Shop L, 315 W. Rollins Rd., Round Lake Beach, Illinois (October 13, 2020, 2:14 p.m.);
- Victim Shop M, 4824 S. Ashland, Chicago, Illinois (October 21, 2020, 2:28 p.m.);
- Victim Shop N, 3243 W. Lawrence, Chicago, Illinois (November 6, 2020, 5:41 p.m.);

- Victim Shop O, 6817 Indianapolis Blvd., in Hammond, Indiana (December 16, 2020, 12:49 p.m.);
- Victim Shop P, 901 E. Irving Park Rd., Streamwood, Illinois (January 19, 2021, 3:25 p.m.); and
- Victim Shop Q, 1718 W. Algonquin Road, Arlington Heights, Illinois (January 22, 2021, 6:45 p.m.).

5. All of the above listed businesses are pawn shops, with the exception of Victim Shop K, a jewelry store, and Victim Shop G, a title loan business. According to information provided by the company that owns Victim Shops A, C, E, H, and O, those Shops are locations of a company that, according to its website, allows customers to borrow money using various personal property as collateral, including jewelry and electronics. The company is headquartered in Texas and has locations throughout the United States. According to an employee of that company, the company at times transfers merchandise from store to store depending on the need for inventory and supply at different locations. Additionally, the company sends high-cost jewelry in its inventory for cleaning and evaluation to a jewelry refurbishment center in Fort Worth, Texas, before being returned to the originating stores. At times, company locations also send high-end jewelry to the company's Jewelry Liquidation Center in Las Vegas, Nevada, which sells the jewelry items and credits the originating store location for the sale.

6. Based on witness statements and my review of surveillance footage of the above-described robberies, each robbery was committed by between two and four Black men who entered the shops, displayed weapons, and obtained property from the stores by force and threat of force, and then fled in a vehicle. During some of the

robberies, the offenders carried a brick and piece of rock or concrete, which were used to smash jewelry display cases to access the jewelry.

7. As set forth in more detail below, WILLIAMS and RUSSELL were captured on security video recordings of the robberies of Victim Shops A, D, E, G, H, K, L, M, N, O, P, and Q. WILLIAMS and RUSSELL used (i) WILLIAMS's 2012 Dodge Avenger, (ii) RUSSELL's gold Jeep Compass (Subject Vehicle 1); (iii) a 2014 Dodge Avenger registered to Individual A (Subject Vehicle 2), and (iv) RUSSELL's white Chrysler Crossfire (Subject Vehicle 3) to commit some of the robberies as described below. DNA evidence recovered from the robberies of Victim Shops K, L, M, and N was examined and yielded possible DNA match to RUSSELL's DNA profile in CODIS.

8. On February 11, 2021, FBI agents executed a search warrant on an apartment located on the 5500 block of South May, Chicago, Illinois (the Subject Premises), which is WILLIAMS's residence. Both RUSSELL and WILLIAMS were present in the residence. Inside the residence, and on the persons of RUSSELL and WILLIAMS, agents found items of clothing and pairs of shoes that were worn in the robberies of Victim Shops G, H, K, L, M, N, O, P, Q, as described in further detail below. Further, law enforcement agents found approximately \$14,000 U.S. currency rolled up and concealed in RUSSELL's crotch area.

**RUSSELL Was Captured on Video Committing the
Robberies of Victim Shops A, D, E, G, H, K, L, M, N, O, P, and Q**

9. As discussed below: I identified RUSSELL as one of the offenders who committed the robberies of Victim Shops A, D, E, G, H, K, L, M, N, O, P, and Q by comparing security video recordings of each of those robberies to: a prior booking

photograph of RUSSELL, body-worn camera recordings of police interactions with RUSSELL, and my own personal observations of RUSSELL while conducting physical surveillance and during the execution of the search warrant at the Subject Premises.

10. Security video from the robbery of Victim Shop A showed one of the robbers wearing a hat, with another cloth or piece of clothing covering his mouth and hanging down over his chest. The offender also wore a long-sleeve shirt with an illustration of an eye design, as shown below:



11. I also watched security video recordings of the robberies of Victim Shop D and Victim Shop E. Those videos show what appears to be the same individual wearing the same shirt and neck covering.

12. Based on my training and experience, I believe that RUSSELL wore not only a face covering but also a shirt or cloth around his head and neck to conceal his

distinctive neck tattoos, seen in the below booking photo, thereby further concealing his identity.



RUSSELL Booking Photo (CPD) – September 2019

13. I also watched the security camera footage from Victim Shop K, recorded on September 13, 2020, and observed the individual whom victim witnesses reported as one of the men who robbed Victim Shop K on September 25, 2020. Based on my review of this September 13, 2020, security camera recording and body camera recordings of a September 3, 2020, police interaction with RUSSELL,¹ I believe that this individual is RUSSELL, because of the matching characteristics including

¹ On September 3, 2020, at approximately 12:56 p.m., CPD conducted a traffic stop of a 2021 Kia sedan after observing a rear passenger not wearing a seatbelt. According to the Investigative Stop Report, law enforcement identified the driver as Henry Williams, a convicted gun offender, and the rear passenger as Terrance WILLIAMS. There was a third occupant of the vehicle sitting in the front passenger seat. I reviewed body worn camera footage of the September 3, 2020 traffic stop. I recognized the third occupant of the vehicle as RUSSELL by comparing that video to known booking photographs of RUSSELL.

height, weight, hair, skin color, age, manner in which the jeans are worn, gait, arm tattoos, and shoes, as shown below:



Victim Shop K (Sept. 13, 2020)



CPD body cam (Sept. 3, 2020)

14. I also watched security video from the robberies of Victim Shops G, H, L, M, N, O, P, and Q. I recognized RUSSELL as one of the offenders in each of those robberies based on my comparison of those videos to: (a) a September 2019 booking photograph of RUSSELL; (b) body-worn camera recording of a police encounter with RUSSELL on August 31, 2020; (c) body-worn camera recording of a police encounter with RUSSELL on September 3, 2020; and (d) my personal observations of RUSSELL as recently as February 11, 2021.

15. On February 11, 2021, law enforcement agents conducted physical surveillance of the Subject Premises prior to executing the search warrant. They

observed RUSSELL enter the Subject Premises wearing white shoes, jeans, and a dark winter jacket. Approximately five minutes later, law enforcement entered the Subject Premises pursuant to the search warrant. Inside the Subject Premises, law enforcement observed:

a. The dark winter jacket that RUSSELL wore when he entered the Subject Premises was located close to him. Inside the jacket pocket were RUSSELL's identification card, social security card, suspected narcotics, and keys. I recognized this jacket as the jacket RUSSELL wore during the robberies of Victim Shop O (December 16, 2020); Victim Shop P (January 19, 2021); and Victim Shop Q (January 22, 2021).

b. In the kitchen of the Subject Premises, law enforcement found the white sneakers that RUSSELL was observed wearing when he entered the Subject Premises. I recognized these as the sneakers that RUSSELL wore during the robberies of Victim Shop G (August 28, 2020); Victim Shop H (August 28, 2020); Victim Shop L (October 13, 2020); and Victim Shop P (January 19, 2021).

c. On the floor between the kitchen and living room, law enforcement found the pair of shoes that RUSSELL wore during the casing of Victim Shop K, as described above in paragraph 13, and the robbery of Victim Shop P, described below at paragraph 46.

**DNA Evidence from Victim Shops K, L, M, and N
Is a Possible Association to the CODIS Profile of RUSSELL**

16. Law enforcement obtained DNA samples from evidence collected from crime scenes of the robberies of Victim Shops K, L, M, and N. These samples were

submitted to an FBI laboratory for further analysis. On or about December 15, 2020, the FBI laboratory reported its conclusions. According to that report, and additional information provided by laboratory personnel, the DNA evidence submitted from the armed robberies of Victim Shop K, L, M, and N are consistent with originating from the same single male contributor.

17. The FBI Laboratory submitted one of the DNA evidence items, a swab from the display counter at Victim Shop L, into the Combined DNA Index System (“CODIS”)

18. Based on my training and experience, I know that CODIS is software which supports a tiered system of DNA databases (local, state, and national). It is designed to assist law enforcement in the identification of individuals through the exchange and comparison of DNA profiles, as well as to provide a storage medium for DNA records provided by participating law enforcement agencies.

19. On or about December 31, 2020, the FBI Laboratory issued an additional report. The report indicated that the DNA evidence item submitted from Victim Shop L indicated a possible DNA association between that evidence and a profile submitted to CODIS by the Illinois State Police DNA Indexing Laboratory. Specifically, the DNA profile returned as associated with: “Falandis Russell and Russell Falandis, DOB 1/1/1995 and 7/26/1995,” with a state identification number IL22148021 and an Illinois Department of Corrections number M55220. The report indicated that a “confirmation sample from the identified suspect [RUSSELL] must be acquired to provide a conclusion about this possible DNA association.”

WILLIAMS Is Captured on Video Committing the Robberies of Victim Shops G, H, K, L, M, N, O, and Q

20. As discussed below, I identified WILLIAMS as one of the offenders who committed the robberies of Victim Shops G, H, K, L, M, N, O, and Q based on the following: (a) comparison of the security video recordings from each of those robberies to an October 2019 booking photograph of WILLIAMS, body-worn camera recording of the September 3, 2020 police encounter with WILLIAMS; and photographs of WILLIAMS posted to his Facebook account, and (b) comparison of the shoes that WILLIAMS wore during the robberies to shoes that he is wearing in social media photos.

21. I compared known images of WILLIAMS, including an October 2019 CPD booking photograph and CPD body worn camera footage from the September 3, 2020 traffic stop, to security camera recordings from the robberies of Victim Shop G and Victim Shop H. That comparison showed that WILLIAMS matches the physical characteristics, to include height, weight, facial profile, and eye shape, of one of the offenders recorded robbing Victim Shop G and Victim Shop H. The comparison images are below:



WILLIAMS Booking Photograph – October 2019



Williams on Body Worn Camera – September 3, 2020



Image of Offender from Victim Shop G



Image of Offender from Victim Shop H

22. The FBI identified a Facebook profile in the name of “Deo Trustnone”, as the account used by WILLIAMS based in part on: (a) the “About Me” section of the account lists the same birth date as that of WILLIAMS; (b) according to records obtained from Facebook, the email addresses associated with the account are “terrancewilliamslove@gmail.com” and “terrancewilliamslove19@gmail.com”. The following images taken from the account show WILLIAMS wearing those same pants and boots as those worn by an offender in the robberies of Victim Shops G and H:



Image posted to WILLIAMS's Facebook Account (9/19/2020)



Image posted to WILLIAMS's Facebook Account (1/9/2020)

23. During the armed robbery of Victim Shop L, one of the offenders, who appears to match WILLIAMS in height, size, and skin color, wore distinct, Nike “Jordan” shoes, as seen in the following images from Victim Shop L security video.



Security Video from Robbery of Victim Shop L on 10/13/2020

24. A photograph posted to the Facebook account on or about July 14, 2020 shows WILLIAMS wearing the same shoes.

25. I also reviewed the security camera recordings of the robberies of Victim Shops K, M, N, O, and Q. I recognized one of the offenders in those robberies as WILLIAMS based on my comparison to the photographs of WILLIAMS posted to his Facebook account, the October 2019 booking photograph of WILLIAMS, and body-

worn camera recordings from the September 3, 2020 traffic stop. I recognized WILLIAMS based on the height, weight, skin color, and facial features.

26. On or about February 11, 2021, law enforcement conducted a search of the Subject Premises pursuant to the court-authorized search warrant. During the search of WILLIAMS's bedroom,² law enforcement found the following items of clothing and footwear, which matched what WILLIAMS wore during the respective specified robberies:

a. Timberland boots, which were worn during the robberies of Victim Shops G and H (August 28, 2020);

b. Black pants, which were worn during the robberies of Victim Shops G and H (August 28, 2020); Victim Shop K (September 25, 2020); Victim Shop L (October 13, 2020); Victim Shop M (October 21, 2020); Victim Shop N (November 6, 2020); and Victim Shop Q (January 22, 2021);

c. Nike Jordan shoes with a light blue/green bottom trim, which were worn during the robberies of Victim Shop K (September 25, 2020); Victim Shop N (November 6, 2020); and Victim Shop O (December 16, 2020);

d. Multi-color Nike Jordan sneakers, which were worn during the robbery of Victim Shop L (October 13, 2020);

² The bedroom was identified as WILLIAMS's as follows: the Subject Premises is a two-bedroom apartment. During the execution, the other resident of the Subject Premises identified the other bedroom as belonging to her. Additionally, as described herein, agents found several items of clothing and shoes that WILLIAMS has been observed wearing on prior occasions, including in photographs posted to his Facebook account.

e. Black hooded sweatshirt with a white Nike logo on chest, which was worn during the robberies of Victim Shop K (September 25, 2020); Victim Shop L (October 13, 2020); Victim Shop M (October 21, 2020); Victim Shop N (November 6, 2020); Victim Shop O (December 16, 2020); and Victim Shop Q (January 22, 2021);

f. Black boots, which were worn during the robbery of Victim Shop Q (January 22, 2021).

27. Also during the execution of the search warrant, law enforcement observed that WILLIAMS was wearing a black jacket, which he wore during the robbery of Victim Shop Q (January 22, 2021). There was one round of ammunition in the jacket pocket.

28. During the search of WILLIAMS's bedroom, agents observed that the bed in this bedroom appeared to be the same same bed shown in November 29, 2020 post to WILLIAMS's Facebook account. That post, shown below, was a video that showed RUSSELL sitting on a bed with a distinctive gray headboard. I recognized RUSSELL based on his physical appearance, including tattoos, which are the same as those shown in a CPD booking photograph. In the video, RUSSELL holds up stacks of U.S. currency, which appear to be all \$100 bills. The video also shows what appears

to be a firearm with an extended magazine lying on the bed behind RUSSELL and the cash.



Firearm lying on bed indicated with black arrow

WILLIAMS and RUSSELL used WILLIAMS's 2012 Dodge Avenger to Commit the Robberies of Victim Shops D, E, G, H, and K

29. Witnesses to the robberies and video evidence showed that the offenders used a 2012 black Dodge Avenger in the robberies of Victim Shops D, E, G, H, and K.

30. According to police reports and body camera recordings, on August 31, 2020, CPD towed a black Dodge Avenger bearing VIN#1C3CDZCB4CN243647 after police stopped the vehicle for running a red light and passing a CPD car in a bike lane. During this traffic stop, the driver identified himself as Falandis RUSSELL.

31. I watched the body worn camera recording of the August 31, 2020 traffic stop, which provided detailed video footage of the Avenger. I observed several unique features of the Avenger that matched the features of the Avenger that appeared in the video of some of the robberies, specifically:

a. I observed the same decorative rear door panels on the Avenger shown in the video recording of Victim Shop H (August 28, 2020);

b. I observed the same sunroof on the Avenger shown in the video recording of Victim Shop H (August 28, 2020);

c. I observed the same white, obscured registration plate in the video recording of Victim Shop E (August 10, 2020).

d. I observed the same rear decals, including a sticker on the left rear, in the video images obtained from Victim Shop E (August 10, 2020), Victim Shop D (August 10, 2020), and Victim Shop K (September 25, 2020).

32. According to information provided by the Illinois Secretary of State, the Dodge Avenger that RUSSELL was driving on August 31, 2020, bearing the VIN ending in 3647, was issued a temporary registration tag on May 26, 2020, registered to Terrance WILLIAMS.

33. According to reports from the Hometown Police Department, law enforcement encountered the Dodge Avenger on or about October 12, 2020, at approximately 1:31 p.m., when an officer responded to the area of 4000 West 87th Street, Hometown, Illinois, in response to a call of a vehicle fire. The police officer spoke with an individual on scene who identified himself as the driver of the Dodge

Avenger. The individual stated that the vehicle caught on fire as he was driving. The individual stated that his name was Kwon Russell, and that his home address was 18 Elm Court in Bolingbrook. After viewing a booking photograph of Falandis RUSSELL, the Hometown PD officer confirmed that the individual who identified himself as Kwon Russell was actually Falandis RUSSELL.

**RUSSELL and WILLIAMS used
RUSSELL's Jeep Compass (Subject Vehicle 1)
in the Casing of Victim Shop K and the Robberies of Victim Shops L and O**

34. According to police reports, on September 25, 2020, at approximately 12:23 p.m., the Bolingbrook Police Department responded to a report of an armed robbery at Victim Shop K, located at 643 E. Boughton Rd., in Bolingbrook, Illinois. The victim employees described the offenders as three Black males, wearing face masks. The victim employees reported that initially, two offenders wearing blue hooded sweatshirts entered the shop and announced a robbery, then instructed the employees to open the cash registers. The offenders then took the employees to the breakroom and instructed them to open the safe. Next, the employees heard a loud sound and yelling from the front of the store. Victim employees observed a third offender, wearing a gray hooded sweatshirt, yelling at the other robbers to run. All three robbers fled the store. During the robbery, the robbers also smashed a jewelry display case and took several items of jewelry.

35. Two victim employees present during the armed robbery of Victim Shop K on September 25, 2020, told law enforcement that they believed that the

offender who broke the glass case during the armed robbery on September 25, 2020 may have been in the store earlier, on or about September 13, 2020.

36. Based on my training and experience, I know that individuals involved in robbery offenses may visit their target victim locations to prepare for a planned robbery by observing, for example, the layout of the store, potential getaway routes, and the presence of security personnel.

37. I reviewed security camera footage recorded on September 13, 2020, from both Victim Shop K itself and also from an outside camera in the retail area where Victim Shop K is located. The video from Victim Shop K showed an individual who matched the appearance of one of the offenders from the September 25th robbery enter the store alone. The video from the outside camera showed that same individual drive away from the shopping area in what appears to be a Jeep Compass with a sunroof.

38. On October 13, 2020, at approximately 2:14 p.m., personnel from the Round Lake Beach Police Department (RLBPD) responded to a silent alarm call at Victim Shop L, located at 315 West Rollins Road, Round Lake Beach, Illinois. Upon arrival, victim employees reported that an armed robbery had just occurred.

39. The FBI reviewed security camera recordings from the date of the armed robbery of Victim Shop L. The video shows the offenders fleeing the scene in a gold Jeep Compass with a sunroof.

40. I also reviewed security video footage from the robbery of Victim Shop O. The video shows a gold Jeep Compass with no license plates park in front of Victim

Shop O at approximately 12:40 p.m. on December 16, 2020. At approximately 12:47 p.m., according to the security video from Victim Shop O, three Black males exited the gold Jeep Compass and entered Victim Shop O to commit the robbery. I identified this vehicle as Subject Vehicle 1 by comparing the security video to physical surveillance I conducted on December 21, 2020, in which I observed the same distinct features, including: a sunroof, a dented passenger side, and black roof rails. Additionally, I noticed some of these features on the Jeep Compass captured in the September 13, 2020 video from the area of Victim Shop K and the October 13, 2020 robbery of Victim Shop L, including the color, make, model, black roof rails, and sunroof. I did not observe a dented passenger side on videos from Victim Shops K and L.

41. On or about January 18, 2021, the FBI conducted physical surveillance in the area of the Subject Premises, and observed a gold Jeep Compass matching the characteristics of the Compass used in the robberies of Victim Shops K, L, and O, parked on the west side of South May Street, facing south, near the entrance to the Subject Premises (Subject Vehicle 1). At this time, the Compass had a regular registration license plate (not temporary), Illinois license plate CN96890. According to a law enforcement database, license plate CN96890 was registered to FALANDIS T. RUSSELL, Illinois driver's license R24025895212. This registration was to the same VIN as the prior temporary Illinois tag 353V270, which I observed on that vehicle on or about October 14, 2020.

42. On January 27, 2021, I observed RUSSELL clearing snow off of Subject Vehicle 1, which was parked in front of the Subject Premises. RUSSELL was wearing a hooded black puffy winter jacket, which matched the jacket worn by one of the offenders in the robberies of Victim Shop P, and white shoes, which matched the shoes worn by one of the offenders during the robbery of Victim Shop Q, as discussed below.

43. During the execution of the search warrant at the Subject Premises on or about February 11, 2021, law enforcement found a pair of keys that belonged to Subject Vehicle 1 inside the jacket that RUSSELL was observed wearing. RUSSELL acknowledged that the keys were his. Earlier that day, law enforcement observed RUSSELL arrive at the Subject Premises driving Subject Vehicle 1, and park it on the street in front of the Subject Residence.

**RUSSELL Used WILLIAMS's 2014 Dodge Sedan to Commit the
Robbery of Victim Shop P (January 19, 2021)**

44. On or about January 19, 2021, at approximately 3:25 p.m., the Streamwood Police Department reported to Victim Shop P in response to a hold up alarm. Employee A told police that the store had just been robbed by two Black men. Employee A stated that during the robbery, the shorter man displayed a handgun. Employee A further stated that the offenders commanded employees to empty the cash registers and open the jewelry counter. The offenders placed cash and jewelry into a garbage bag they carried. Employee A reported that the offenders fled in a black Dodge sedan, which Employee A believed was possibly a Charger, with no license plates.

45. Security video from Victim Shop P on January 19, 2021, shows that the offenders entered the shop at approximately 3:21 p.m., and that one of the offenders was a Black male who was wearing a hooded black puffy winter jacket, and dark sneakers with a bright border above the sole.

46. As described in more detail above in paragraph 13, RUSSELL was wearing what appeared to be these same shoes during a body-camera-recorded encounter with police on or about September 3, 2020. RUSSELL wore the same shoes during the casing of Victim Shop K on or about September 13, 2020, as seen on security video. Law enforcement recovered these shoes on the floor between the kitchen and living room of the Subject Premises.

47. According to telephone location information provided pursuant to court order, on January 19, 2021, at approximately 11:48 a.m., Subject Phone 1,³ was located in the area of the Subject Premises and then departed, connecting to towers between the Subject Premises and Victim Shop P. At approximately 3:26 p.m., Subject Phone 1 connected to a cell tower approximately 0.8 miles from Victim Shop P. At approximately 5:41 p.m., Subject Phone 1 was again located in the area of the Subject Premises.⁴

³ Subject Phone 1 is the telephone assigned number ending in 0174, subscribed to by Individual B, at an address in the 4500 block of S. Lamon Avenue, Chicago, IL, and used by Falandis Russell, with service provided by T-Mobile.

⁴ At approximately this same time, Subject Phone 2 was located in the area of the Subject Premises, according to information provided by service providers pursuant to court order. Subject Phone 2 is the telephone assigned number ending in 7161, used by WILLIAMS, with service provided by AT&T. When the search warrant was executed on February 11, 2021, WILLIAMS was observed using Subject Phone 2.

48. When agents entered the Subject Premises to execute the search warrant, they observed RUSSELL speaking on a cell phone, which he then placed on the floor. When an agent dialed the phone number for Subject Phone 1, he observed that the phone that RUSSELL had been using rang in response.

49. Law enforcement obtained images from the Illinois Tollway Authority of vehicles that violated tolls on January 19, 2021. At approximately 3:11 p.m., the Tollway Authority captured a front and rear picture of a black Dodge Avenger bearing rear license plate CD 61324 at Plaza 328 of Illinois Route 390 westbound, towards Victim Shop P. There was no front license plate. This plaza is approximately 5 miles from Victim Shop P. The passenger side of the front windshield had handwriting as shown below. A pine tree air freshener was hanging from the rearview mirror.



50. According to records from the Illinois Secretary of State, license registration CD61324 is registered to a 2014 Dodge 4-door vehicle bearing VIN 1C3CDZAG6EN116612 in the name of Individual A, with an address on the 660 block of E. 100th Street in Chicago (Subject Vehicle 2). This is the same address that

appears on WILLIAMS's state identification card, according to records from the Illinois Secretary of State.

51. I reviewed body-worn camera footage of a CPD traffic stop of Subject Vehicle 2, which bore license plate CD61324, conducted on or about January 15, 2021. During that encounter, a pine tree air freshener was hanging from the rear view mirror. WILLIAMS was driving, and provided police his state identification card.

52. At approximately 3:30 p.m. following the robbery, the Illinois Tollway Authority captured front and rear images of the same black Dodge Avenger at Plaza 328 of Illinois Route 390, eastbound, away from Victim Shop P. In these images, the vehicle has no license plates, but the same handwriting appears on the front windshield and the same air freshener is hanging from the rearview mirror.

53. On or about January 27, 2021, I conducted physical surveillance outside of the Subject Premises. I observed Subject Vehicle 2 parked in front of that address. There was handwriting on the passenger side of the front windshield, which appeared faded, and I also observed a pine tree air freshener hanging from the rear view mirror.

54. I performed physical surveillance at the Subject Premises on February 2, 2021. I observed Subject Vehicle 2 parked in front of the entrance to the Subject Premises. Subject Vehicle 2 was also parked on the street in front of the Subject Premises on February 11, 2021, when law enforcement executed the search warrant.

**RUSSELL's 2004 Crossfire Was Used to Commit the
Robbery of Victim Shop Q (January 22, 2021)**

55. On or about January 22, 2021, at approximately 6:45 p.m., Arlington Heights Police Department (AHPD) responded to a report of an armed robbery at

Victim Shop Q, located at 1718 W. Algonquin Road. I reviewed security camera footage from Victim Shop Q showing the robbery and observed that the robbery was committed by two offenders. As shown on the video, one of the offenders appears to be a Black male, with a slim build, who was wearing a black hooded puffy winter jacket, blue jeans, and white sneakers, who appeared similar to the individual wearing the black hooded puffy winter jacket during the robbery of Victim Shop P.

56. The security video from the exterior of Victim Shop Q shows that the two offenders approached Victim Shop Q from the direction of a parking area located on the south side of Victim Shop Q. The parking area is outside the scope of Victim Shop Q's security cameras. After the robbery, the exterior security cameras show the two offenders running back in the direction of the same parking area. Approximately 23 seconds after the two offenders stepped out of the frame, the video shows what appears to be a white sports car driving out of the parking area, turning left out of the parking lot, and then turning right onto West Algonquin Road at approximately 6:47 p.m.

57. I also reviewed red light camera footage recorded in the area of West Algonquin Road and the northbound ramp for Route 53. This location is approximately one mile away from Victim Shop Q. The recording showed a white sports car pass the northbound ramp for Route 53, and continue west bound at approximately 6:48 p.m. The vehicle had no rear license plate attached.

58. On or about January 11, 2021, the FBI observed a 2004 Chrysler Crossfire (Subject Vehicle 3) bearing Illinois temporary tag 002574764, parked near

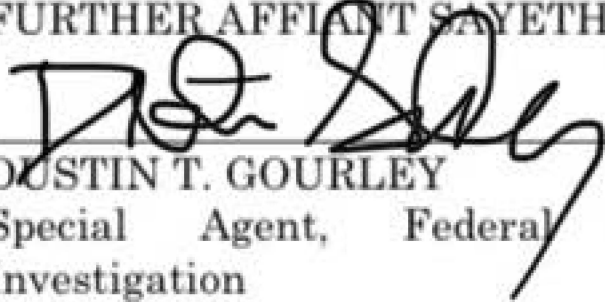
the entrance of the Subject Premises. According to information provided by the Illinois Secretary of State, the temporary tag on Subject Vehicle 3 was issued on November 8, 2020 to “FALANDIS TREVELL JR. RUSSELL,” at 4530 S. Lamon Avenue, for a 2004 Chrysler Crossfire. I also observed Subject Vehicle 3 parked on the street outside the Subject Premises on or about January 12, 2021, and February 2, 2021.

59. Based on my comparison of my observations of Subject Vehicle 3 during physical surveillance, and the characteristics of the white sports car seen on the red light images discussed above, I believe that the white sports car used in the robbery of Victim Shop Q is Subject Vehicle 3 based on the following matching characteristics: color, body style (2-door), design of area around the rear license plate, and the shape of the rear lights.


CONCLUSION

61. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that beginning on or about July 31, 2020, and continuing until on or about January 22, 2021, RUSSELL and WILLIAMS conspired to obstruct, delay, and affect interstate commerce, and the movement of articles and commodities in commerce, by robbery, as "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b).

FURTHER AFFIANT SAYETH NOT.


DUSTIN T. GOURLEY
Special Agent, Federal Bureau of
Investigation

SWORN TO AND AFFIRMED by telephone February 12, 2021.


Honorable JEFFREY T. GILBERT
United States Magistrate Judge