

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DARRELL SINGLETON

CASE NUMBER: 22 CR 600

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Count One

On or about October 31, 2022, at Lansing, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

Title 18, United States Code, Section 1951(a) and Section 2

Offense Description

obstructed, delayed, and affected 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), and committed and threatened physical violence to a person and property in furtherance of a plan and purpose to do something in violation of Title 18, United States Code, Section 1951(a)

Count Two

On or about October 31, 2022, at Lansing, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

Title 18, United States Code, Section 2113(b) and (d), and Section 2

Offense Description

did take and carry away, with the intent to steal, money exceeding \$1,000 in value belonging to, and in the care, custody, control, management, and possession of Bank A, namely, the United States currency stored in the Bank A ATM located at 16767 Torrence Avenue, Lansing, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, assaulted a person, namely, Brink's Courier A

This criminal complaint is based upon these facts:

X Continued on the attached sheet.



Scott Erthal
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 foregoing affidavit by telephone.

Date: November 16, 2022

Judge's signature

City and state: Chicago, Illinois

YOUNG B. KIM, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, SCOTT ERTHAL, being duly sworn, state as follows:

INTRODUCTION AND AFFIANT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since approximately January 2019. My current responsibilities include the investigation of violent crimes, including, among others, kidnapping, bank robbery, violations of the Hobbs Act, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that DARRELL SINGLETON has violated Title 18, United States Code, Section 1951(a) (Hobbs Act robbery); Title 18, United States Code, Section 2113(b) and (d) (theft of over \$1,000 from a federally insured bank and assaulting another person during the commission of the offense); and Title 18, United States Code, Section 2 (aiding and abetting the foregoing offenses). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging DARRELL SINGLETON with Hobbs Act robbery and bank theft, 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 defendant committed the offenses alleged in the complaint.

3. The statements in this affidavit are based on my personal knowledge, interviews of witnesses, review of still shots from security video and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts, as well as my training and experience and the training and experience of other law enforcement officers with whom I have consulted.

FACTS SUPPORTING PROBABLE CAUSE

4. According to Lansing Police Department (“LPD”) reports, on or about October 31, 2022, at approximately 10:46 a.m., three black males conducted an armed robbery of a Bank A ATM and a Brink’s armored vehicle in the area of 16767 Torrence Avenue in Lansing, Illinois. Following the robbery, when law enforcement attempted to conduct a traffic stop on the Dodge Charger used during the robbery, the Charger sped away before crashing. After the crash, all three occupants of the Charger attempted to flee from law enforcement. Only one of the individuals, DARRELL SINGLETON successfully escaped. His brother, CORRIE SINGLETON, was arrested (and is charged separately by criminal complaint in *United States v. Corrie Singleton*, Case No. 22 CR 574), along with another suspect later determined to be a juvenile, who was arrested by the Lansing Police Department and is being charged in Cook County Juvenile court.

5. According to records from Brink’s, the robbers took approximately \$1,025,956 total, including around \$121,824 from the Bank A ATM and around \$904,132 from the armored truck. My own investigation and preliminary information

provided by bank employees confirmed that Bank A's deposits were insured by the Federal Deposit Insurance Corporation at the time of the offenses.

Interview of Brink's Courier A

6. FBI agents responded to the scene of the robbery and interviewed the Brink's armored courier (the "Brink's Courier A"). Brink's Courier A stated the following to FBI agents, in sum or substance:

a. On or about October 31, 2022, at approximately 10:46 a.m., Brink's Courier A went to Bank A, located at 16767 Torrence Avenue in Lansing, Illinois, and pulled in front of the ATMs. Brink's Courier A went to the mid-section of the Brink's truck and cut the bands on the currency and organized the currency to be used during his/her stop at the Bank A. Brink's Courier A then serviced the south ATM. As Brink's Courier A was servicing the south ATM, Brink's Courier A noticed a white Dodge Charger behind the Brink's truck. The Dodge Charger backed into a parking spot at the bank.

b. Brink's Courier A then began working to service the north ATM. As Brink's Courier A opened the north ATM, an unknown vehicle used the south ATM. As the unknown vehicle left, the white Dodge Charger pulled up next to the Brink's truck. Three unknown black males exited the Dodge Charger and began to yell at Brink's Courier A. Brink's Courier A turned around and saw one of the three robbers with a handgun. Brink's Courier A was ordered not to move. Brink's Courier A put his/her hands up and one of the robbers took his/her firearm from his/her belt. The robbers demanded money from Brink's Courier A and took the Brink's bag that

Brink's Courier A was going to use to refill the ATM from his/her possession. The robbers also removed cassettes filled with cash from the ATM.

c. After removing an unknown quantity of cash from the Bank A ATM, the robbers then dragged Brink's Courier A to the Brink's truck and told Brink's Courier A to open the truck. Brink's Courier A opened the truck with his/her Brink's key fob. One of the robbers looked inside the truck and another robber, who was wearing a grey hooded sweatshirt, made Brink's Courier A open the inner truck door with his/her fingerprint. The robbers pushed Brink's Courier A inside the truck. Brink's Courier A handed the money, which was in colored, sealed plastic bags, to the robbers. Brink's Courier A remained in the truck while the robbers fled back to the Dodge Charger.

d. Brink's Courier A described the robbers as three black males. Robber #1 was wearing a grey hooded sweatshirt, average build, approximately 5'5" to 5'7" tall, wearing a shiny black-gaiter style mask, dark-colored pants, armed with a handgun. Brink's Courier A stated Robber #1 (who—as detailed below—is now believed to be DARRELL SINGLETON) took his/her firearm during the offense. Robber #2 was approximately 6'0" tall, average build, dark-color hooded sweatshirt, and dark-colored pants. Brink's Courier A stated that Robber #2 held a gun to his/her head but s/he was not sure if Robber #2 had his own gun or if he was using the gun belonging to Brink's Courier A. Robber #3 was wearing a dark-color hooded sweatshirt. Brink's Courier A could provide no further details about Robber #3.

7. On or about November 1, 2022, Brink's advised law enforcement that the total amount of U.S. currency taken by the robbers was approximately \$1,025,956.

Investigation by the Lansing Police Department

8. According to my review of preliminary Lansing Police Department reports, as well as my conversations with Lansing Police Department officers who were involved in the investigation and other individuals with personal knowledge of the relevant facts, I know the following:

a. Officers of the Lansing Police Department responded to Bank A, located at 16767 Torrence Avenue in Lansing, Illinois. Dispatch received a 911 call that indicated that a white Dodge Charger was used in the robbery and was travelling southbound on Torrence Avenue. Dispatch then advised officers that the offending vehicle was a white Dodge Charger that was fleeing southbound on Torrence Avenue. Lansing Police officers located a matching vehicle travelling southbound on Torrence Avenue at or around 170th Street. Lansing Police officers attempted to stop the vehicle utilizing their emergency lights and sirens, but the vehicle fled southbound before colliding with another vehicle and crashing into the wall of the Interstate 80 westbound entrance ramp.

b. Dash-camera footage from a Lansing Police vehicle showed an individual who was wearing a dark-colored sweatshirt, jeans, and white sneakers (later identified after he was taken into custody as CORRIE SINGLETON based on his own admission to Lansing Police officers) exit the driver's seat of the crashed

Dodge Charger. Officers then observed a black male wearing a grey hooded sweatshirt, later identified as DARRELL SINGLETON as detailed below, exit the driver's seat after CORRIE SINGLETON and Individual B exit the back driver's seat of the vehicle. Both the driver's side door and the rear driver's side door were left open. Lansing Police officers pursued CORRIE SINGLETON on foot and arrested him after he jumped over a concrete wall of the ramp onto a median of the expressway. Lansing Police officers also pursued DARRELL SINGLETON but he jumped from the freeway ramp to the ground below and was able to evade apprehension. Lansing Police officers pursued Individual B and arrested him on the on-ramp. Individual B was later determined to be a juvenile.

c. Law enforcement did not search the vehicle onsite due to its location. Consistent with law-enforcement policy authorizing the vehicle to be impounded, the vehicle was towed from the scene to the Federal Bureau of Investigation office to be inventoried and searched later. Before moving it from the scene, several preliminary photographs were taken from the exterior. Through the open driver's side doors, inside the vehicle, Brink's bags with bundles of U.S. currency were observed along with loose bills. Additionally, a firearm was observed on the back seat. Two of those photographs are below and depict the Brink's bags with U.S. currency and loose cash, along with the handle of a firearm plainly visible in the rear seat of the car:



Front Seat



Rear Seat

9. According to Lansing Police Department officers, following his arrest, CORRIE SINGLETON was transported back to Bank A, where Brink's Courier A positively identified CORRIE SINGLETON by his clothing (which, as noted above, consisted of a dark-colored sweatshirt, jeans, and white sneakers) as being consistent with what she remembered one of the robbers wearing. CORRIE SINGLETON and Individual B were both transported to local hospitals for evaluation following the car crash.

10. On or about October 31, 2022, within hours of the robbery, Witness A, who reported that s/he was in the parking lot of Bank A during the robbery, contacted law enforcement and provided law enforcement with a short cell-phone video showing a black male in a black-hooded sweatshirt holding a gun to Brink's Courier A and

another person wearing a grey sweatshirt and black and white shoes reaching into the open ATM. Below is a still image of that video:



Information Received from Bank A

11. Bank A provided law enforcement with security video of the robbery at the ATM and the white Dodge Charger used by the robbers. The footage revealed that as Brink's Courier A was servicing the ATM at Bank A, a male wearing a grey hooded sweatshirt and black and white sneakers approached Brink's Courier A and grabbed her/him, appearing to hold something to his/her back. Two other males approach, one wearing a black hooded sweatshirt with a gun drawn and the other wearing a dark-colored hooded sweatshirt and gloves. As the two other robbers approach, the robber with the grey hooded sweatshirt appears to remove something from the right-side of

Brink's Courier A's person before appearing to tuck something into his waistband. The robber wearing the black hooded sweatshirt continues to hold Brink's Courier A at gunpoint while the other two robbers empty the ATM. Brink's Courier A is then dragged away from the ATM by the robbers.

12. Still images from the video are below.



The Robber with the Grey Sweatshirt and Black and White Shoes Approaches Brink's Courier A Near Bank A ATM



The Robber with the Black Sweatshirt Holds Brink's Courier A at Gunpoint Near Bank A ATM

Digital Video Snapshot

Recorder: MNAT1942A756
Camera Name: 3.2 DU ATM #2 Overview



Capture Size: 352 x 264 pixels
Device Network Name: MNAT1942A756
Device Serial Number: AT1942A756
Device Station ID: 4281

Digital Video Snapshot

Recorder: MNAT1942A756
Camera Name: 3.2 DU ATM #2 Overview



Capture Size: 352 x 264 pixels
Device Network Name: MNAT1942A756
Device Serial Number: AT1942A756
Device Station ID: 4281

Images of the white Dodge Charger Used as Getaway Vehicle from Robbery

13. Bank A representatives confirmed that at the time of the robbery, Bank A's deposits were insured by the Federal Deposit Insurance Corporation ("FDIC").

Information Received from Brink's

14. Security video footage was also obtained from Brink's. Brink's security video captured both the events that occurred at the ATM and inside the Brink's armored truck. The footage from outside the truck matches that received from Bank A.

15. Security footage from inside the Brink's armored truck shows the robber with the grey hooded sweatshirt pushing Brink's Courier A into the truck with a firearm with an extended magazine held to his/her back. The robber with the grey hooded sweatshirt then forces Brink's Courier A to open the rear part of the truck and hand him the money, which he then hands off to one of the robbers outside of the truck.

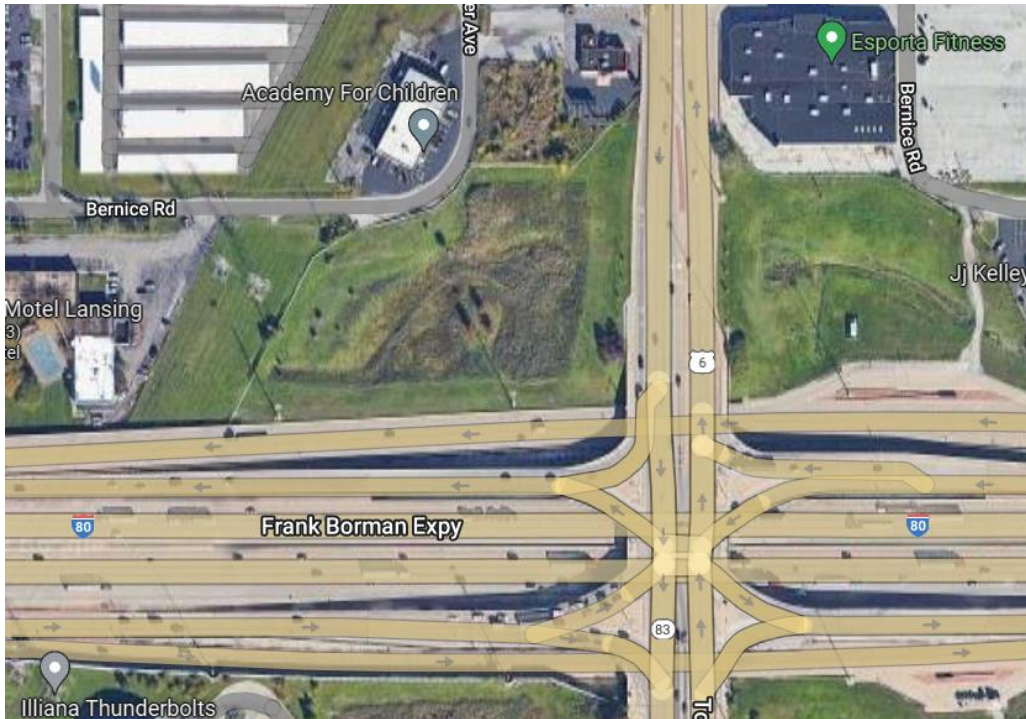
16. A still image from the interior of the Brink's truck is below.



The Robber with the Grey Hooded Sweatshirt, Holding a Firearm with an Extended Magazine, Inside of the Brink's Truck

Identification of DARRELL SINGLETON as one of the Robbers

17. On or about October 31, 2022, law enforcement spoke with Witness B, who was in the parking lot of the Esporta Fitness, when s/he noticed a subject, later identified (through a photo lineup and other means detailed below) as DARRELL SINGLETON, wearing a black t-shirt and who appeared to have been “beat up” and was “limping really bad.” Notably, the Esporta Fitness parking lot is approximately 500 feet from the crash site of the white Dodge Charger used by the robbers. A Google Map showing the entrance to Interstate 80 in relation to the Esporta Fitness is below.



Map of Interstate 80 Entrance and Esporta Fitness

18. Witness B advised that DARELL SINGLETON approached him/her and asked if s/he could give him a ride home. Witness B advised DARRELL SINGLETON to use the phone at the fitness center. DARRELL SINGLETON stated something to the effect of “no they going to get me.” DARRELL SINGLETON removed his black shirt¹ revealing a white tank top. DARRELL SINGLETON asked Witness B to use his/her cell phone to call his mother. Witness B dialed the number and placed the phone on speaker for DARRELL SINGLETON. A female answered the phone and agreed to pick up DARRELL SINGLETON at the fitness center. Shortly after the

¹ Lansing Police conducted an initial canvas of the area between Interstate 80 and the Esporta Fitness in an attempt to locate the grey sweatshirt DARRELL SINGLETON was seen wearing when he exited the white Dodge Charger. No items of evidentiary value were located during this initial canvas, though, as detailed below, a further search of the area by FBI personnel recovered what is suspected to be DARRELL SINGLETON’s sweatshirt along his flight path from the Intersection 80 entrance to the Esporta Fitness.

phone call, DARRELL SINLGETON asked to be driven to the IHOP in Lansing, Illinois. Witness B drove DARRELL SINGLETON to the IHOP in Lansing, Illinois and he immediately exited the vehicle. Witness B observed a police vehicle driving through the parking lot of the IHOP and DARRELL SINGLETON laid on the ground, appearing to hide. Witness B left the IHOP and waved down a police officer. Witness B advised that DARRELL SINGLETON used his/her cell phone to call the phone number 773-XXX-9167 and provided law enforcement with his/her phone number.

19. On or about November 8, 2022, Witness B was shown a sequential photo lineup. Witness B identified DARRELL SINGLETON out of the lineup as the individual s/he picked up near the fitness center, used his/her phone, and gave a ride to the IHOP. Witness B advised s/he was “9 out of 10” positive in his/her identification.

20. The Lansing Police Department was able to obtain exterior video security footage from the IHOP located at 2430 173rd St, Lansing, Illinois. A review of the footage showed DARRELL SINGLETON² being dropped off by Witness B and later picked up by a white Mazda SUV. DARRELL SINGLETON can be seen wearing the same black and white sneakers as the robber in the grey hooded sweatshirt from the Brink’s and Bank A security videos.

² In every instance where DARREL SINGLETON is identified in security footage, that identification is based on the following: 1) the black and white shoes that match those seen in the Brink’s and Bank A security footage; 2) Witness B’s identification of DARREL SINGLETON as the person s/he picked up at the Esporta Fitness and drove to IHOP; and 3) Lakisha Williams’ statement to law enforcement that she picked up her son, DARREL SINGLETON, from the IHOP in a white Mazda SUV.

21. Law enforcement conducted a search of law-enforcement databases and discovered that the phone number 773-XXX-9167 belonged to Lakisha M. Williams. Law Enforcement learned that Williams had a last known address in South Holland, Illinois. Law enforcement contacted members of the South Holland Police Department, who advised that they were familiar with CORRIE SINGLETON and DARRELL SINGLETON. They further advised that Williams was the mother of both CORRIE SINGLETON and DARRELL SINGLETON. Law Enforcement responded to 796 E. 163rd Street in South Holland, Illinois, the last known address for Williams and DARRELL SINGLETON, and found the residence abandoned.

22. On or about October 31, 2022, at approximately 1:30 p.m., I called phone number 773-XXX-9167 and spoke with a female who identified herself as LAKISHA Williams. I identified myself as a Special Agent with the Federal Bureau of Investigation and requested to speak to Williams in person, in reference to an ongoing investigation involving her sons. Williams agreed to meet with me at the Lansing Police Department.

23. Williams later arrived at the Lansing Police Department and spoke with Task Force Officer Anthony Aguirre and me. Williams stated that she received a phone call from her son, DARRELL SINGLETON, who told her that he had just been “jumped” and stated something to the effect of “Mom, you gotta come get me.” Williams showed me her phone-call history, which indicated she had received a phone call from Witness B. DARRELL SINGLETON told Williams that he was by the LA

Fitness³ in Lansing, Illinois. Williams started driving until she received a second phone call from DARRELL SINGLETON from another unknown number stating that he was at the IHOP in Lansing, Illinois. Williams stated she arrived at the IHOP and DARRELL SINGLETON got into her vehicle. Williams advised she drove a white Mazda SUV. Williams stated that she observed DARRELL SINGLETON walking with a limp. Williams stated she did not know where DARRELL SINGLETON was at that time of agents' interview with her.

Security Video from Esporta Fitness in Lansing, Illinois

24. On or about November 9, 2022, I responded to the Esporta Fitness located at 17635 Torrence Avenue in Lansing, Illinois. I learned that the facility had exterior security cameras that were functioning on or about October 31, 2022. At approximately 10:39:22 a.m.,⁴ I observed DARRELL SINGLETON appear from the northeast corner of the building. He then walked southbound along the building while limping. DARRELL SINGLETON was wearing a black shirt with a white cross on the back, black pants, and black and white shoes.

25. DARRELL SINGLETON began walking southbound along the building, with a noticeable limp. He was wearing a black shirt with a white cross on the back, black pants, and black and white shoes. The security video shows DARRELL SINGLETON approaching Witness B, who was exiting his/her vehicle. Both

³ DARRELL SINGLETON incorrectly identified the gym as LA Fitness but it was actually a different gym, Esporta Fitness.

⁴ It should be noted that the security system timestamp was approximately 22 minutes behind the actual time.

DARRELL SINGLETON and Witness B then walked around the north corner of the building, briefly out of frame of the security camera before returning. Witness B and DARRELL SINGLETON then returned from the north corner of the building. DARRELL SINGLETON was no longer seen wearing the black shirt and was now wearing a white tank top (consistent with Witness B's reports that he removed his shirt). Lastly, DARRELL SINGLETON can be seen entering Witness B's vehicle, which then exited the parking lot.

Security video from the IHOP in Lansing, Illinois

26. On or about November 11, 2022, I reviewed security footage from the IHOP located at 2430 173rd Street in Lansing, Illinois, which the Lansing Police Department had previously obtained on or about October 31, 2022. Based on my review of the footage, and my discussions with Lansing Police Department officers, I know that the IHOP has two separate systems for their security cameras. For the first system, at approximately 11:12 a.m., I observed DARRELL SINGLETON, wearing a white tank top, black pants, black and white sneakers and holding a black shirt while limping noticeably enter the front entrance of the IHOP and take a seat in the lobby by the main windows. At approximately 11:15 a.m., a white Mazda SUV (consistent with what Williams, DARRELL SINGLETON's mother, told agents was her car) entered the parking lot of the IHOP. At approximately 11:15 a.m., DARRELL SINGLETON exited the IHOP, still limping noticeably. At approximately 11:15 a.m., the White Mazda SUV exited the parking lot.

27. I then reviewed the second system, which provides coverage of the IHOP's parking lot. At approximately 11:34 a.m.,⁵ I observed Witness B's vehicle enter the lot and park. I observed DARRELL SINGLETON exit the vehicle wearing a white tank top, black pants, and black and white sneakers. DARRELL SINGLETON was limping noticeably. At approximately 11:34:38 a.m., he walked towards a white SUV parked within the lot. DARRELL SINGLETON then ducked down on the driver's side of the vehicle, as a marked law enforcement vehicle can be seen passing by the business. DARRELL SINGLETON can then be seen lying down on the ground and crawling underneath the white SUV, remaining there for approximately a minute and a half. DARRELL SINGLETON then appeared from the other side of the white SUV and walked towards the front door of the IHOP.

28. At approximately 11:39 a.m., a white Mazda SUV (consistent with what Williams, DARRELL SINGLETON's mother, told agents was her car) entered the parking lot of the IHOP and parked. DARRELL SINGLETON exited the IHOP and entered the white Mazda SUV, which then exited the parking lot.

29. Still images from the security video are below.

⁵ The timestamp on this system is 24 minutes ahead of the actual time



DARRELL SINGLETON in Front of the IHOP, Wearing a White Tank Top and Black and White Shoes



DARRELL SINGLETON Inside of the IHOP, Wearing a White Tank Top and Black and White Shoes

Law Enforcement's Secondary Search of the Area near Torrence Avenue and Interstate 80

30. On November 10, 2022, agents and task force officers of the FBI and Bureau of Alcohol, Tobacco, and Firearms conducted a secondary search of the grassy area south of the Esporta Fitness located at 17635 Torrence Avenue in Lansing, Illinois. The search included the possible flight path from where DARRELL

SINGLETON was observed jumping over the railing on Interstate 80 along the east side to Torrence Avenue towards the fitness center. Law enforcement located a small Nike grey hooded sweatshirt in the grass along the east side of Torrence Avenue. The sweatshirt matched the appearance of the grey sweatshirt worn by the robber as depicted in the Brink's security footage. Approximately 50 feet to the south of the Nike sweatshirt, law enforcement located a FN 509 9mm handgun Serial #BUS14675 in a small area of bushes. ATF agents assisting in the search confirmed that the handgun was the same handgun taken from Brink's Courier A (bearing the same make, model, and serial number) by the robber in the grey sweatshirt.

31. Below is a photograph of the recovered sweatshirt and a still image from the Brink's security footage.



32. Below is a map of Interstate 80 and Torrence Avenue in Lansing, Illinois, which shows the approximate locations of the recovered sweatshirt, handgun, and surveillance camera at the Esporta Fitness.

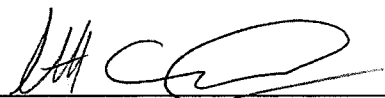


CONCLUSION

33. Based on the above information, I respectfully submit that there is probable cause to believe that on or about October 31, 2022, in the Northern District of Illinois, Eastern Division, DARRELL SINGLETON obstructed, delayed, and affected commerce, and the movement of articles and commodities in commerce, by robbery, and committed and threatened physical violence to Brink's Courier A in furtherance of a plan and purpose to rob Brink's Courier A, in violation of Title 18, United States Code, Section 1951(a) and Section 2; and took and carried away money exceeding \$1,000 in value belonging to, and in the care, custody, control, management, and possession of Bank A, namely the United States currency stored in the Bank A ATM located at 16767 Torrence Avenue, Lansing, Illinois, the deposits

of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, assaulted a person, namely, Brink's Courier A, in violation of Title 18, United States Code, Section 2113(b) and (d), and Section 2.

FURTHER AFFIANT SAYETH NOT.



Scott Erthal
Special Agent
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me
telephonically on November 16, 2022.

Honorable YOUNG B. KIM
United States Magistrate Judge