

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

BRANTEZ EVANS and
LAMARR BROWN

CASE NUMBER:

CRIMINAL COMPLAINT

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

On or about June 25, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, the defendants violated:

Code Section

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

Offense Description

obstructed, delayed, and affected interstate commerce, and the movement of articles and commodities in commerce, by robbery of a Subway Restaurant at 1234 N. Halsted in Chicago

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

ROBERT M. BRIDGES
Task Force Officer, Federal Bureau of Investigation (FBI)

Sworn to before me and signed in my presence.

Date: June 27, 2019

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

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AFFIDAVIT

I, ROBERT M. BRIDGES, being duly sworn, state as follows:

1. I am a Task Force Officer with the Federal Bureau of Investigation (FBI), and have been so employed since August 2018. I have been employed by the Chicago Police Department for approximately 24 years. 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 Brantez EVANS and Lamarr BROWN 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 EVANS and BROWN with robbery affecting commerce, 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, including observations of surveillance videos, information provided to me by other law enforcement agents, my experience and training, and the experience of other agents.

FACTS SUPPORTING PROBABLE CAUSE

Introduction and Summary

4. FBI Chicago, along with the Chicago Police Department, is investigating a series of armed and attempted robberies that occurred in Chicago in June 2019.

5. Based on the investigation to date, FBI believes EVANS and BROWN have committed at least the following five robberies or attempted robberies, all located in Chicago:

- a. Subway Restaurant at 177 N. Wells on June 21, 2019;
- b. Subway Restaurant at 166 N. Wabash on June 24, 2019;
- c. Loop Mini Mart at 14 W. Jackson on June 25, 2019;
- d. Dunkin' Donuts at 10 W. Chicago Avenue on June 25, 2019; and
- e. Subway Restaurant at 1234 N. Halsted on June 25, 2019

6. I am aware that each of the businesses listed above is engaged in interstate commerce in that they receive goods from out-of-state and sell goods that travel in, and are used in, interstate commerce. In the section below, I have described some of the evidence gathered to date on these robberies.

Subway Restaurant at 177 N. Wells

7. On or about June 21, 2019 at approximately 5:45 p.m., an armed robbery occurred at the Subway Restaurant located at 177 N. Wells in Chicago.

8. According to Victim A, an African American male with dreadlocks wearing jeans and a black jacket entered the restaurant at approximately 5:45 p.m. that day. Victim A stated that the robber walked up to the counter and he/she asked him "how may I help you." The robber then displayed what appeared to be a black

handgun in his waistband and told Victim A to hand over all the money in the cash register, which he/she did. The robber then walked out of the restaurant.

9. On June 26, 2019, Victim A was shown a photographic lineup of six individuals' photos, including EVANS. Victim A identified EVANS as the robber.

Subway at 166 N. Wabash

10. On or about June 24, 2019 at approximately 7:18 p.m., an armed robbery occurred at the Subway restaurant located at 166 N. Wabash in Chicago.

11. According to surveillance footage and witness interviews with Victims B and C, EVANS and BROWN entered the restaurant and ordered sandwiches. As Victim B was making their sandwiches, EVANS pulled out what appeared to be a black handgun, pointed it at Victim B, and stated words to the effect of "give me all the money or I will shoot you." Victim B gave EVANS approximately \$200 from the cash register, and EVANS and BROWN fled northbound on Wabash.

12. On June 26, 2019, Victims B and C were shown a photographic lineup of six individuals' photos, which included EVANS. Victims B and C identified EVANS one of the robbers.

13. I have reviewed the Subway surveillance footage and viewed EVANS and BROWN in person. Based on their physical appearance and the black jacket worn by EVANS, which was recovered upon arrest, the individuals in the surveillance video appears to be EVANS and BROWN:



Loop Mini Mart at 14 W. Jackson

14. On or about June 25, 2019 at approximately 4:30 p.m., an armed robbery occurred at the Loop Mini Mart located at 14 W. Jackson in Chicago.

15. According to Victim D, the robber entered the store while another individual stood outside the doorway. The robber lifted up his shirt and displayed what appeared to be a black handgun. Victim D handed the robber money from the register, and he and the individual outside the store fled northbound on State Street.

16. On June 26, 2019, Victim D was shown a photographic lineup of six individuals' photos, including EVANS. Victim D identified EVANS as the robber.

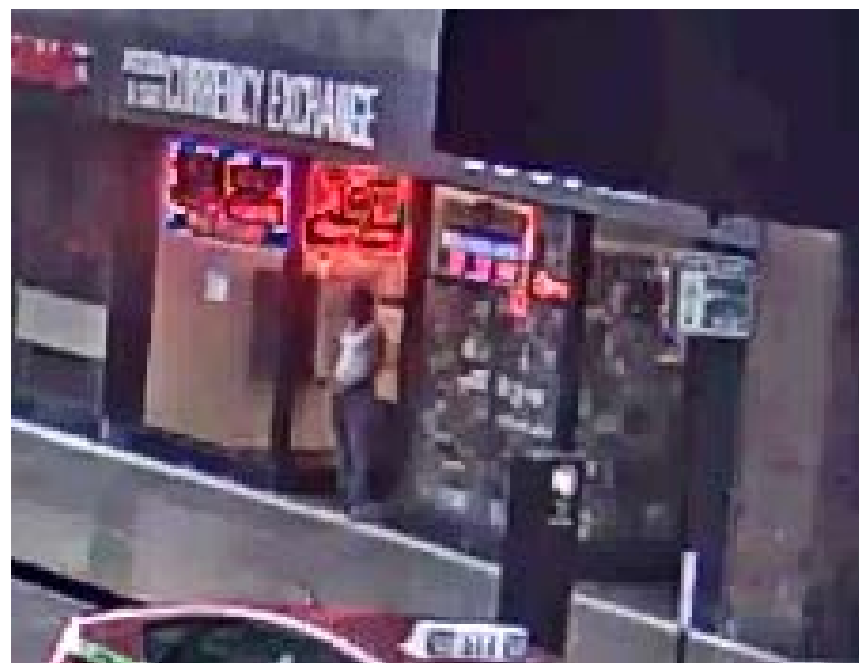
17. I have reviewed surveillance footage from cameras on Jackson Avenue around the time of the robbery, and believe it to show EVANS and BROWN, based on their physical appearance and clothing, including the jacket worn by EVANS and the undershirt worn by BROWN. The surveillance footage shows EVANS and BROWN enter and then leave the Dunkin' Donuts on Jackson and Dearborn:



18. EVANS and BROWN then walked eastbound on the south side of Jackson before crossing the street:



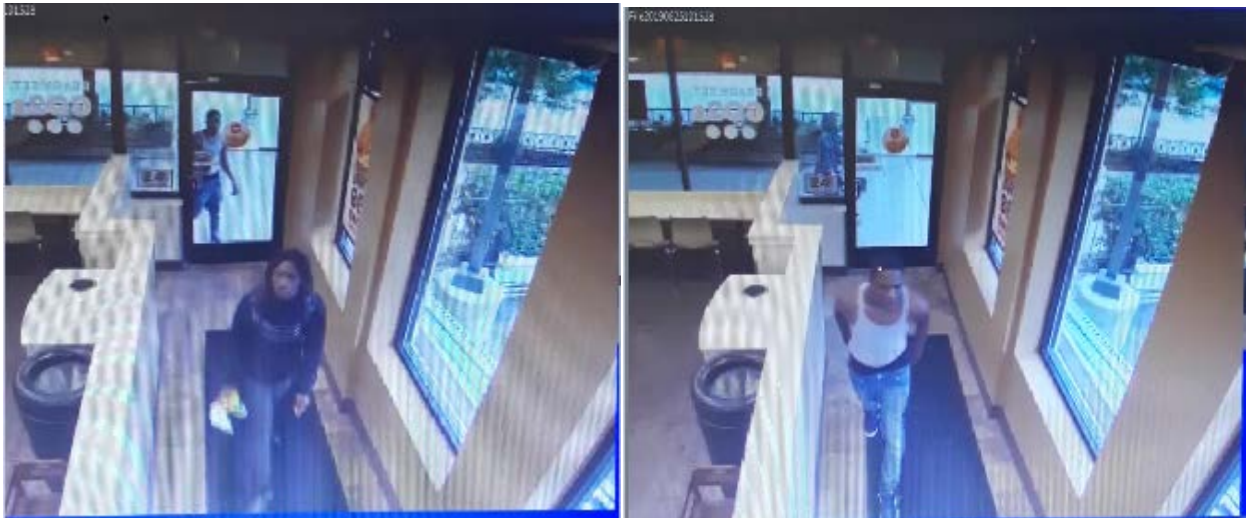
19. BROWN then waited outside the Mini Mart at 14 W. Jackson as a lookout while EVANS went in to rob it:



Dunkin' Donuts at 10 W. Chicago

20. On or about June 25, 2019 at approximately 7:30 p.m., an attempted armed robbery occurred at the Dunkin' Donuts located at 10 W. Chicago Avenue in Chicago.

21. According to surveillance footage and witness interviews with Victims E and F, EVANS and BROWN entered the Dunkin' Donuts and sat for a few minutes before walking up to the counter. The following surveillance images captured their entrance, in which EVANS appears to be carrying a backpack:



22. According to Victims E and F, EVANS told Victims E and F “this is a stick up” and then lifted his shirt to display what appeared to be a black handgun in his waistband. When Victims E and F did not comply with the demand, EVANS told BROWN “we’re not going to get anything” and they both fled from the scene.

23. I have reviewed the Dunkin' Donuts surveillance footage. Based on my review of their physical appearance and clothing worn that day, the individuals in the surveillance video appear to be EVANS and BROWN.

24. On June 26, 2019, Victim E was shown a photographic lineup of six individuals' photos, which included EVANS and BROWN. Victim E identified EVANS and BROWN as the robbers.

Subway Restaurant at 1234 N. Halsted

25. On or about June 25, 2019 at approximately 7:55 p.m., an armed robbery occurred at the Subway Restaurant located at 1234 N. Halsted in Chicago.

26. According to surveillance footage and witness interviews with Victims G and H, EVANS and BROWN entered the Subway location through its rear entrance. BROWN approached the cash register, where Victim G was standing and taking an order. BROWN was carrying a backpack, which he put on a chair. Victim H was in the back kitchen area and could see EVANS and BROWN on the surveillance monitor. Based on my review of the Subway surveillance footage, it appears that for this robbery, BROWN was wearing the black jacket that EVANS was previously wearing that day during the Dunkin' Donuts robbery.



27. According to Victim G, he/she asked BROWN if he “wants something,” at which point BROWN lifted the right side of his shirt and displayed what appeared to be a firearm protruding from his right pocket:



28. According to Victim G, BROWN stated “give me the money,” at which point Victim G opened the cash register but did not initially take the money out for BROWN. BROWN stated “come on man you don’t want to get shot,” and Victim G handed approximately \$307 from the register to BROWN. EVANS and BROWN then fled the scene northbound on Halsted. EVANS returned to the Subway shortly afterwards to retrieve the backpack that was left on the chair, and then fled once again northbound on Halsted.

Arrest of Defendants and Additional Identifications

29. About fifteen minutes after the robbery of Subway on Halsted, at approximately 8:10 p.m., Chicago Police Officers arrested EVANS and BROWN in the area of 1535 N. Dayton Street, approximately a half mile from the Subway. After

their arrest, Chicago Police Officers transported Victim F to the arrest location to view EVANS and BROWN. Victim F identified EVANS and BROWN as the individuals who tried to rob Dunkin' Donuts on Chicago Avenue that day. Chicago Police transported EVANS and BROWN to the Subway on Halsted, and both Victims G and H positively identified them as the individuals who robbed Subway that day.

30. The officers recovered a backpack and black jacket from EVANS and BROWN, which were similar to those shown in the surveillance footage described above. EVANS was wearing a long sleeve shirt and BROWN was wearing an undershirt that are similar to the shirts shown in the surveillance footage that day. The officers also recovered a black BB gun that was consistent with the weapon described by the victims.

31. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that on or about June 25, 2019, BRANTEZ EVANS and LAMARR BROWN 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), by robbing a Subway

Restaurant at 1234 N. Halsted in Chicago, in violation of Title 18, United States Code, Section 1951.

FURTHER AFFIANT SAYETH NOT.

ROBERT M. BRIDGES
Task Force Officer, Federal Bureau of
Investigation

SUBSCRIBED AND SWORN to before me on June 27, 2019.

YOUNG B. KIM
United States Magistrate Judge