

**FILED**  
5/21/2021  
THOMAS G. BRITTON  
CLERK, U.S. DISTRICT COURT  
CC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**21 CR 326**

UNITED STATES OF AMERICA

CASE NUMBER:

v.

KIAR EVANS

**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 May 20, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

*Code Section*

*Offense Description*

Title 18, United States Code,  
Section 2119(1)

with the intent to cause death or serious bodily harm took a motor vehicle that had been transported, shipped, and received in interstate commerce from the person and presence of another by force, violence, and intimidation

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

s/Jonathan Schu - by consent/JC

JONATHAN R. SCHU  
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: May 21, 2021

  
\_\_\_\_\_  
*Judge's signature*

City and state: Chicago, Illinois

JEFFREY CUMMINGS, U.S. Magistrate Judge  
*Printed name and title*

**AFFIDAVIT**

I, Jonathan R. Schu, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so assigned since 2016. Before that, I was employed as a Police Officer/Detective with the Schiller Park Police Department since 2010. As part of my duties as an FBI Special Agent, I investigate criminal violations of federal statutes relating to firearms and violent crimes, including, including but not limited to Title 18, United States Code, Sections 922, 924(c), and 2119.

2. This affidavit is submitted in support of a criminal complaint alleging that KIAR EVANS has violated Title 18, United States Code, Section 2119(1). As set forth more fully below, on or about May 20, 2021, EVANS, armed with a pistol, attempted to carjack a Chevrolet Impala in Chicago, Illinois. EVANS fired approximately two rounds into the Chevrolet. The Chevrolet drove away. EVANS then immediately ran up to a Nissan Altima with a pistol in hand and carjacked the Nissan. A CPD helicopter observed EVANS flee the scene in the stolen Nissan. EVANS was subsequently involved in a multi-vehicle traffic crash in the Nissan and apprehended by law enforcement shortly thereafter.

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging EVANS with taking a motor vehicle by force, violence, and intimidation, 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 offense alleged in the complaint.

4. This affidavit is based on my personal knowledge, experience, training, information provided to me by other law enforcement officers, my review of reports, surveillance video, and my training and experience.

5. Based on information contained in this Affidavit, there is probable cause to believe that, on or about May 20, 2021, in Chicago, in the Northern District of Illinois, EVANS, with the intent to cause death or serious bodily harm, took a motor vehicle, namely a 2015 Nissan Altima, with Vehicle Identification Number (“VIN”) #1N4AL3AP1FN909343 (the “Nissan”), which had been transported, shipped, or received in interstate or foreign commerce, from the person or presence of another by force and violence and by intimidation.

## **SUMMARY OF PROBABLE CAUSE**

### **Background**

6. Based on information I received from Chicago Police Department (“CPD”) officers, as well as my review of CPD reports, on or about May 20, 2021, at approximately 1:45 p.m., CPD officers on patrol received an Office of Emergency Management and Communication (OEMC) dispatch about a reckless driver in a gray Infiniti traveling on Kedzie Avenue toward Ogden Avenue in Chicago. According to a CPD report, responding officers observed a gray Infiniti (the “Infiniti”) with hood damage and a missing front license plate weave in and out of traffic lanes on Kedzie

Avenue and speed up. The officers lost sight of the Infiniti and relayed this information to the OEMC dispatchers and provided a description of the Infiniti.

7. According to CPD officers and CPD reports, a CPD helicopter, was monitoring the area and, at approximately 1:49 p.m., observed a gray Infiniti matching the description the officers provided traveling westbound on the I-290 Expressway before exiting the I-290 Expressway near Independence Boulevard in Chicago. The helicopter followed the Infiniti and the helicopter officers relayed their observations to responding officers on the ground. According to CPD officers and CPD reports, the helicopter officers relayed that they observed the Infiniti in the area of Harrison Street and Independence Boulevard and observed the driver of the Infiniti, who the helicopter officers described as a Black male in a red sweater (the “Subject”), exit the Infiniti and attempt to carjack a gray vehicle. According to a CPD report, the helicopter officers also relayed that the Subject successfully carjacked a vehicle and fled the area. According to a CPD report, responding officers went to the scene of the suspected carjacking on West Congress Parkway in Chicago.<sup>1</sup>

**Attempted Carjacking of the Chevrolet Impala and Discharge of a Firearm**

8. As detailed below, after crashing the Infiniti near Independence Boulevard and West Congress Parkway in Chicago, EVANS approached a 2018 Chevrolet Impala (the “Impala”), with VIN #2G1125S34J9149692, attempted to get

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<sup>1</sup> Based on my review of Google Maps, the scene of the carjackings is the intersection of West Congress Parkway and South Independence Boulevard. There is an I-290 Expressway exit near the intersection.

into the Impala, and fired at least two shots into the passenger-side window of the vehicle, causing the window to shatter. The driver of the Impala was able to drive away from the scene.

9. As part of its investigation, law enforcement interviewed Individual A and Individual B, the two occupants of the Impala. Based on my review of CPD reports and the interviews of Individual A and Individual B, the following information was learned:

a. Individual A, the driver, and Individual B, the front seat passenger were in the Impala stopped at a red light on Independence Boulevard after exiting I-290 Expressway;

b. Individual B recalled that, while the Impala was stopped at the intersection, Individual B observed a blue-colored Infiniti weaving in and out of traffic.

c. Individual A recalled that a vehicle (the Infiniti) drove over the curb and attempted to go around other vehicles before it crashed at the intersection.

d. After the Infiniti crashed, both Individual A and Individual B observed a Black man, later identified as EVANS,<sup>2</sup> exit the Infiniti and approach the front passenger side door of the Impala. Individual B recalled that the Black man was wearing a black facemask and orange-hooded sweatshirt. Individual A described the Black man as in his late teens or early twenties, dressed in an orange hoodie.

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<sup>2</sup> As noted below, Individuals A and B identified EVANS as the individual who attempted to carjack the Impala during a police show-up identification following EVANS' arrest.

e. Individuals B recalled that EVANS knocked on the passenger-side window and attempted to pull open the front passenger door handle but it was locked and the Impala's window was up. Individual B recounted that, as EVANS stood outside the passenger-side door of the Impala, Individual B saw a black metallic object in EVANS's waistband that Individual B recognized as a gun with an extended magazine. Individual B then heard two gunshots and the front passenger-side window shattered. The shattered glass hit Individual B's arm. Individual B had glass fragments in his arm from the broken window and was treated for his injuries at the scene.

f. Individual A recalled that EVANS approached the Impala and tried to get into the Impala. Individual A observed EVANS pull a gun from his waistband, aim the gun at the passenger-side front window, and fire two rounds through the window. According to Individual A, both rounds struck the Impala. Individual A drove quickly from the area to escape and, once away from the scene, flagged down a marked CPD vehicle.

### **Carjacking of the Nissan Altima**

10. As detailed below, after the Impala occupied by Individual A and Individual B drove away, EVANS approached a second vehicle, a 2015 Nissan Altima, with VIN #1N4AL3AP1FN909343 (the "Nissan"), at the same intersection of West Congress Parkway and Independence Boulevard. EVANS approached the driver's side window of the Nissan, pointed a firearm at the Nissan's driver, Individual C, and demanded Individual C exit the Nissan. As EVANS pointed the firearm at Individual

C, he attempted to open the driver's side door. Individual C complied, exited the vehicle, and EVANS drove off in the Nissan.

11. During my interview of Individual C, he/she reported the following:

a. After exiting the I-290 Expressway, Individual C was stopped at an intersection in the Nissan when Individual C observed a Black man in the middle of the street attempting to carjack another vehicle. Individual C described the Black man, later identified as EVANS, as a man in his mid-twenties with a skinny build and light complexion, wearing a black, full-face ski mask, light colored jeans, and an orange hoodie. Individual C recalled observing EVANS with a gun and hearing approximately four shots fired and then observed the vehicle (the Impala) drive away.

b. Individual C further recalled that, after the Impala drove away, EVANS walked up to the Nissan (Individual C's vehicle) with a gun in hand. According to Individual C, EVANS pointed the gun at Individual C while he pulled on the driver's side door and stated words to the effect of, "Get out! Get out!" Individual C complied, exited the Nissan, and EVANS entered and drove away.

*POD Camera Footage*

12. Based on my review of CPD Police Operation Device ("POD") camera footage, a car (the Infiniti) crashed onto the curb at approximately 3750 W. Congress Parkway, near the corner of West Congress Parkway and Independence Boulevard. I further observed an individual dressed in an orange hooded sweatshirt, matching EVANS's description, exit the Infiniti. From my review of the POD footage, a PACE bus temporarily blocks the individual from the POD camera's view. When the PACE

bus moved out of the intersection, I observed the individual walk around the middle of the road before running at a vehicle's driver-side door. I observed the individual enter the vehicle before the vehicle drove away from the area. CPD officers later identified the vehicle in the POD camera footage as Individual C's Nissan.

### **EVANS's Arrest and Recovery of the Firearm**

13. After EVANS carjacked the Nissan, the CPD helicopter continued to follow the Nissan and relayed its location via OEMC. According to CPD reports, the Nissan was involved in a multi-vehicle traffic crash at the intersection of Harrison Street and Ogden Avenue in Chicago, which, according to Google Maps, is approximately 2.6 miles east of the carjacking location.

14. According to CPD reports, officers responded to the crash location and observed EVANS exit the Nissan. EVANS was placed under arrest. At the time of his arrest, EVANS was dressed in an orange hooded sweatshirt, consistent with descriptions provided by Individuals A, B, and C. During a search of the Nissan, officers recovered a loaded, black Glock 19 semi-automatic 9mm pistol, bearing serial number BPWR950, with an extended magazine, an auto-switch, and a laser attachment.

### *Identification of EVANS*

15. According to CPD reports, shortly after EVANS was detained, officers transported Individuals A, B, and C to the location to conduct a show-up identification. Based on CPD reports, both Individual A and Individual B positively identified EVANS as the individual who fired shots into the Impala as he attempted

to carjack the vehicle. CPD reports also confirm that Individual C positively identified EVANS as the individual who carjacked the Nissan while holding Individual C at gunpoint. Individual C also identified the Nissan vehicle as his/her vehicle.

16. According to public source information and a Nissan customer services representative, Nissan Altima vehicles are manufactured in Canton, Mississippi. Therefore, the Nissan traveled in interstate commerce.

### CONCLUSION

17. Based on the foregoing, there is probable cause to believe that, on or about May 20, 2021, at Chicago, in the Northern District of Illinois, KIAR EVANS, with the intent to cause death or serious bodily harm, took a motor vehicle, namely a 2015 Nissan Altima, with VIN #1N4AL3AP1FN909343, which had been transported, shipped, or received in interstate or foreign commerce, from the person or presence of another by force and violence and by intimidation, in violation of Title 18, United States Code, Section 2119(1).

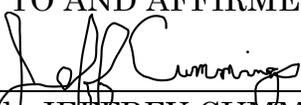
FURTHER AFFIANT SAYETH NOT.

s/Jonathan Schu - by consent/JC

JONATHAN R. SCHU

Special Agent, Federal Bureau of  
Investigation

SWORN TO AND AFFIRMED by telephone May 21, 2021.

  
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Honorable JEFFREY CUMMINGS  
United States Magistrate Judge