

UNITED STATES DISTRICT COURT
for the
Southern District of Florida

United States of America
v.
REGINALD MITCHELL,
VLADIMIR LOUISSANT,
VICTORIA BARKLEY,
BYRON KYLER, and URI AMMAR,
Defendant(s)

Case No. 11-3119-STB

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 the date(s) of August 21, 2011 in the county of Miami-Dade in the Southern District of Florida, the defendant(s) violated:

Table with 2 columns: Code Section and Offense Description. Contains two entries regarding 18 U.S.C. § 1951, 2 and 18 U.S.C. § 924(c), 924(j), 2.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

[X] Continued on the attached sheet.

George Nau (Handwritten signature)

Complainant's signature

George Nau, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/22/2011

(Handwritten signature of Stephen T. Brown)

Judge's signature

City and state: Miami, FL

(Hon. Stephen T. Brown, U.S. Magistrate Judge
Printed name and title)

AFFIDAVIT

Your affiant George B. Nau, being duly sworn, deposes and states:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), and I am currently assigned to the Violent Crimes/Fugitive Task Force of the Miami Division of the FBI. As a Special Agent for the FBI, I am responsible for conducting investigations of Federal crimes, more specifically, violent crimes. I have over (13) thirteen years experience involving the investigation of Federal criminal violations to include the investigation of violent crimes.
2. This affidavit is based upon my personal knowledge of the events set forth herein, as well as information provided to me by other law enforcement personnel and other sources of information. Because this affidavit is being submitted for limited purposes, I have not included every fact known to me or other law enforcement personnel concerning this investigation, which involves a violation of Title 18, United States Code, Sections 1951, regarding the robbery of U.S. currency from an armored car employee.
3. On August 21, 2011, in the afternoon, Reginald MITCHELL, Vladimir LOUISSANT, Victoria BARKLEY and Byron KYLER met at MITCHELL's residence located at 3327 N.W. 202 Ln, Miami Gardens, Florida. They discussed robbing a Brinks armored car employee of U.S. currency after the employee recovered same from the Calder Race Track and Casino located at 21001 NW 27 Avenue, in Miami Gardens, Florida (hereinafter "facility"). MITCHELL is an employee of the facility who has experience escorting armored car employees

through the facility in performance of their duties. He previously asked his employer to excuse him from work on August 21, 2011. MITCHELL, LOUISSANT, BARKLEY and KYLER all agreed upon a plan for the commission of this robbery, the details of which are set forth below. It was during this meeting that MITCHELL produced a revolver and gave it to LOUISSANT.

4. On August 21, 2011, KYLER drove a Dodge pick up truck to a Walmart. Shortly thereafter, MITCHELL, BARKLEY and LOUISSANT arrived in a grey, Mazda. KYLER entered the Walmart and MITCHELL took possession of the pick up truck and drove away. LOUISSANT was a passenger in the pick up truck. BARKLEY drove away in the Mazda. The plan called for LOUISSANT to rob the Brinks employee and flee to the pick up truck driven by MITCHELL. MITCHELL planned to drive a short distance and abandon the vehicle, at which point BARKLEY would drive them away from the area in the Mazda.
5. As planned, at approximately 5:00 p.m. on August 21, 2011, a Brinks armored car arrived to the facility. The driver remained in the vehicle, and the messenger exited to retrieve U.S. currency. The messenger was escorted through the facility by Uri AMMAR, a facility employee. After retrieving U.S. currency from the facility, the messenger and the facility employee were outside of the facility when they were approached by LOUISSANT.
6. LOUISSANT was wearing a black "hoodie" and brandishing a handgun as he approached the messenger and facility employee. The facility employee began to run from the scene. The messenger drew his firearm and pointed it at LOUISSANT. LOUISSANT shot the messenger, striking him. The messenger

returned fire and struck LOUISSANT in the leg. The messenger took aim to fire and LOUISSANT shot and struck him again. Evidence later revealed that the Brinks employee was shot once in the torso and once in the head.

7. LOUISSANT retrieved a marked Brinks bag containing approximately \$345,000.00 U.S. currency, and ran from the scene. He placed the firearm in the bag. LOUISSANT entered the pick up truck driven by MITCHELL. They fled the scene with the bag and drove to a designated meeting spot. MITCHELL used a cellular telephone to call BARKELY on a cellular telephone to pick them up. BARKELY arrived and MITCHELL and LOUISSANT entered the Mazda with the bag and were driven away by BARKLEY. LOUISSANT was bleeding.
8. At some point, MITCHELL used a cellular telephone to call KYLER on his cellular. MITCHELL told KYLER to report the pick up truck stolen, which he did. Law enforcement responded to the Walmart and interviewed KYLER. KYLER at first claimed to know nothing about a robbery. He admitted only to lending MITCHELL the vehicle and reporting it stolen because MITCHELL told him to. While in the presence of investigating agents, KYLER received a call on his cellular telephone from MITCHELL. MITCHELL questioned KYLER about what he has been saying as there was heavy police presence around his residence. In a post-Miranda statement later on in the evening of August 21, 2011, and continuing into the morning of August 22, 2011, KYLER admitted to being involved in the planning and participation of the robbery as set forth above. He further admitted that he was told by MITCHELL that he would receive a portion of the robbery proceeds.

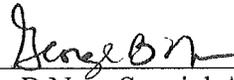
9. BARKLEY drove LOUISSANT and MITCHELL to MITCHELL's residence, where LOUISSANT and MITCHELL changed out of some of the clothing they wore during the robbery. The firearm was removed from the bag at MITCHELL's residence. Some of the money was removed from the bag and also stored in the residence. MITCHELL and BARKELY drove LOUISSANT to Memorial Hospital, located at 703 N. Flamingo Rd., Pembroke Pines, Florida.
10. LOUISSANT entered the hospital under his own power. BARKLEY and MITCHELL drove from the hospital to an apartment complex located at 4007 N. University Drive, Sunrise, Florida. MITCHELL took the bag of money into apartment F105, emptied the bag of the remaining money, stored the money in the apartment and took the bag back to the vehicle.
11. MITCHELL and BARKLEY drove to dumpster and discarded, among other items, some clothing used during the robbery and the empty bag.
12. MITCHELL and BARKLEY then drove to the Seminole Hard Rock Hotel and Casino facility located in Broward County, Florida. MITCHELL used his "Player's Card," and MITCHELL and BARKELY gambled there.
13. Law enforcement responded to Memorial Hospital to interview LOUISSANT. LOUISSANT stated that he was shot in the leg while playing basketball in a park in Miami Gardens, Florida. In a post-Miranda statement later on in the evening of August 21, 2011, and continuing into the morning of August 22, 2011, LOUISSANT admitted to being involved in the planning and participation of the robbery as set forth above, but excluded or minimized the involvement of

BARKELY. He later admitted BARKELY's involvement as set forth above. He further admitted that he would receive a portion of the robbery proceeds.

14. MITCHELL and BARKLEY left the Seminole Hard Rock Hotel and Casino and BARKELY dropped MITCHELL off close to his residence. MITCHELL walked toward his residence and BARKELY drove away. Law enforcement intercepted MITCHELL as he was walking.
15. MITCHELL had previously given BARKELY \$1,000, which she deposited into her bank after she dropped MITCHELL off by his residence.
16. Law enforcement interviewed MITCHELL. In a post-Miranda statement, MITCHELL admitted his involvement in the robbery as set forth above. He further stated that the plan always called for the shooting of the Brinks messenger in order to disable him. The plan also called for shooting AMMAR, the facility employee.
17. Upon being questioned on the matter specifically, MITCHELL, BARKLEY and KYLER each admitted, outside of the presence of each other, that they were aided in their plan by AMMAR, the facility employee. MITCHELL advised that he and AMMAR planned ahead for AMMAR to telephone MITCHELL in order to advise him when the Brinks truck arrived to the facility. MITCHELL further elaborated that the plan called for LOIUSSANT to shoot AMMAR in the leg as well so that, in addition to receiving proceeds from the robbery, he could also sue the facility.
18. In a post-Miranda statement, AMMAR admitted his involvement in the robbery and that he was going to receive proceeds from the robbery.
19. The Brinks employee died of his injuries at a hospital on August 21, 2011. He suffered one gunshot wound to his torso and a second gunshot wound to his head.

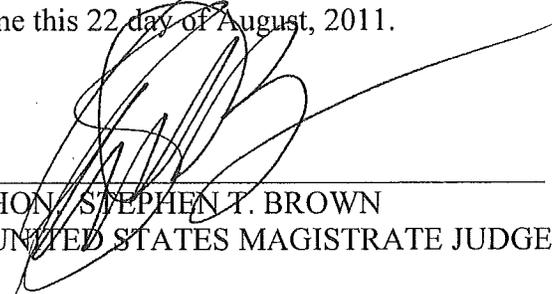
20. Brinks Incorporated is a company that operates in interstate and foreign commerce. For example, Brinks does business in multiple states and also foreign countries. Brinks Incorporated corporate headquarters is located in Coppel, Texas. Brinks will be responsible for the money stolen that was in their care, therefore the robbery as affected commerce, as defined by Title 18, United States Code, Section 1951(a).

FURTHER YOUR AFFIANT SAYETH NAUGHT.



George B. Nau, Special Agent
Federal Bureau of Investigation (FBI)

Sworn to and subscribed before
me this 22 day of August, 2011.



HON. STEPHEN T. BROWN
UNITED STATES MAGISTRATE JUDGE