

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America

v.

TANYA LEGG

Case No.

2:19-mj- 1121- NPM

Defendant(s)

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 September 26, 2019 in the county of Seminole in the Middle District of Florida, the defendant(s) violated:

Code Section

18 U.S.C. §§ 2113(a) and 2.

Offense Description

Aiding and abetting the commission of a bank robbery

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.



Complainant's signature

Brandon Bottom, FBI Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/08/2019



Judge's signature

City and state: Fort Myers, Florida

Nicholas P. Mizell, United States Magistrate Judge

Printed name and title

STATE OF FLORIDA

MASTER AFFIDAVIT

I, Brandan Bottom, being duly sworn, state the following:

Agent Background

1. I am a Task Force Officer ("TFO") with the Federal Bureau of Investigation ("FBI"), and have been since April 2013. I have been employed by the Orlando Police Department ("OPD") since May 2005 and am assigned to the OPD Criminal Investigations Division. Prior to being a TFO, I was assigned to the Orlando Police Department TAC unit. During this time I was responsible for investigating street level violent crime while being tasked to locate and arrest violent offenders. I have received extensive training pertaining to investigating criminal street gangs and violent crime organizations. I have participated in investigations involving, among other offenses, armed robbery, conspiracy, murder, witness tampering, home invasion, human trafficking, and money laundering.

2. I have also conducted investigations concerning the identification of co-conspirators through the use of interviews, telephone records and bills, financial records, ledgers, photographs, and other documents. I have also investigated violent robbery crews, and drug trafficking organizations, and other criminal organizations. I am experienced with the use of cellular telephone analysis and current violent crime trends. I have also participated in

the debriefings of arrested individuals who later cooperated with the United States Government.

3. My training and experience as an Orlando Police officer and an FBI TFO, together with the facts set forth herein, form the basis of my opinions and conclusions in this affidavit.

Purpose of Affidavit

4. The information set forth herein is based on the following: (a) my own personal observations; (b) information that I received from other law enforcement officers involved in this investigation, including by reviewing official reports prepared by other law enforcement officers; (c) interviews of witnesses and the review of reports summarizing the interviews of witnesses; and (d) information provided to me by law enforcement officials who met with and interviewed said witnesses.

5. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the issuance of a criminal complaint, I have not set forth each and every fact that I learned as a result of this investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause that a violation of federal law has been committed. Unless otherwise noted, all statements of other persons described in this affidavit are set forth in substance and in part, rather than verbatim.

6. As set forth below, there is probable cause to believe that on or about September 26, 2019, in the Middle District of Florida, TANYA LEGG

(“LEGG”) knowingly aided and abetted the commission of a bank robbery, in violation of 18 U.S.C. §§ 2113(a) and 2.

Probable Cause Basis

Robbery of 7-11 on June 14, 2019

7. On June 14, 2019, the Lee County Sheriff's Office (LCSO) responded to a reported robbery at a 7-11 located at 17930 North Tamiami Trail, North Fort Myers, Lee County, Florida. Deputies arrived on scene and met with a victim named L.S. L.S. informed the responding deputy that her and a co-worker, A.N., observed a black male, later identified as JOHN ARMSTRONG (ARMSTRONG), run into the 7-11 wearing all black clothing and a blue and white mask (pictured below).



8. ARMSTRONG was armed with a firearm and demanded that both L.S. and A.N. put their hands up. ARMSTRONG demanded money from A.N. who was behind the counter. A.N. froze and ARMSTRONG jumped over the counter. ARMSTRONG then struck A.N. in the head with the firearm he was carrying, causing a laceration to the bottom corner of A.N.'s left eye. L.S. opened both registers for ARMSTRONG and gave ARMSTRONG the money in the registers. ARMSTRONG took the money and exited the store. L.S. hit the panic button to alert the police and called 911.

9. As responding deputies were arriving, they observed a knife sitting on the ground outside the front door of the 7-11. The knife had a black handle and a silver blade with a white sheath over the blade. The knife was photographed and collected for evidence along with video surveillance of the robbery. LCSO Detective Thomas Rall arrived on scene and spoke with the victims. While on scene, Detective Rall collected DNA swabs and requested that the knife be sent to the laboratory for forensic testing. Images and information about the robbery were sent to Crime Stoppers, a community program that allows people to provide anonymous information about criminal activity. A couple days after the robbery, an anonymous tip was received stating that ARMSTRONG was the person who robbed the 7-11. Based on the height and weight descriptions provided by the witness, Detective Rall

believed ARMSTRONG could have conducted the robbery of the 7-11 on June 14, 2019.

10. On August 26, 2019, Detective Rall received a report from the Florida Department of Law Enforcement (FDLE) regarding the knife collected at the scene of the June 14, 2019 robbery. The knife had been processed for latent fingerprints and during the processing a latent finger print was discovered. By comparing ARMSTRONG's known fingerprints with the fingerprint recovered from the knife, FDLE determined that the latent fingerprint recovered off the knife belonged to ARMSTRONG. On August 28, 2019, Detective Rall reviewed the surveillance video of the robbery. While reviewing the surveillance footage, Detective Rall observed that the knife that was collected fell off of ARMSTRONG's person as he entered the 7-11 to rob it.

11. ARMSTRONG has prior felony convictions for carrying a concealed firearm (2009) and aggravated battery/aggravated assault (2009), a case in which he similarly hit the victim in the face repeatedly with his firearm.

Robbery of Bank of Ozarks on July 31, 2019

12. On July 31, 2019, at approximately 8:43 a.m., the Punta Gorda Police Department responded to the Bank of Ozarks located at 3855 Tamiami Trail, Punta Gorda, Florida in reference to a bank robbery. At 8:36 a.m., a black male armed with a silver semi-automatic handgun forced entry into the

bank after catching a teller who was arriving for work at the front door. The male ordered this teller, together with another teller who was already inside the bank, to the vault, telling the tellers to fill a bag and a backpack with cash. The male then ordered the tellers into the bank's bathroom and instructed the tellers to stay in the bathroom for two minutes. The tellers exited the bathroom and called the police. The male stole approximately \$151,000 as a result of that robbery.

13. Video surveillance taken from the bank depicts what appears to be a black 2006 Lincoln Zephyr (pictured below) parking at a location near the bank at approximately 7:47 a.m., *i.e.* less than an hour before the robbery. A male, whose height and build was consistent with ARMSTRONG's height and build, was then seen approaching the bank and hiding in the bushes near the front door. Immediately after the robbery, the black Lincoln can be seen leaving the area. It is believed that the black Lincoln, which as explained below is identical to a vehicle used by LEGG that is registered to LEGG's daughter, was the getaway vehicle.



Relationship between ARMSTRONG and LEGG

14. Between October 4, 2019 and October 7, 2019, ARMSTRONG and LEGG, a white, 43-year-old female, were both observed living at 150 Herron Road, North Fort Myers, Florida 33903 (“150 Herron Road”). In addition, according to the Florida Driver and Vehicle Identification Database (DAVID), ARMSTRONG and LEGG both have the same address listed on their driver’s licenses of 14151 Warner Circle, North Fort Myers, Florida, which address is approximately one mile as the crow flies from 150 Herron Road.

15. A Florida Department of Corrections report provides further evidence that ARMSTRONG and LEGG are in a relationship: According to this report, on July 8, 2015, when ARMSTRONG was in State custody, LEGG called the Florida Department of Corrections Inspector General’s District 10 office using a fake name. LEGG alleged that she had information

on crimes being committed inside the Dade Correctional Institution and wanted to report those crimes on behalf of a current inmate, John ARMSTRONG. A preliminary investigation revealed the true identity of the caller as being LEGG, who at that time was listed as ARMSTRONG's girlfriend on his jail visitation logs. LEGG later admitted her identity and indicated she was calling on behalf of ARMSTRONG.

16. In addition, as set forth below, law enforcement has obtained some of the text messages exchanged between LEGG and ARMSTRONG between September 28, 2019 and October 4, 2019. These text messages show that LEGG and ARMSTRONG are engaged in a sexual relationship.

Arrest of ARMSTRONG on State Charge on August 30, 2019

17. On August 30, 2019, ARMSTRONG was arrested on a State warrant for the robbery of the 7-11 on June 14, 2019. When law enforcement officers tried to effectuate the arrest, ARMSTRONG fled in a Chevy Blazer that was registered to LEGG's daughter. As a result of ARMSTRONG's flight in the Blazer, he crashed into another vehicle and an occupant of that vehicle was killed. After crashing the Blazer, ARMSTRONG was arrested on the robbery charge. ARMSTRONG bonded out of jail on that charge on September 4, 2019, and the State robbery charge remains pending.

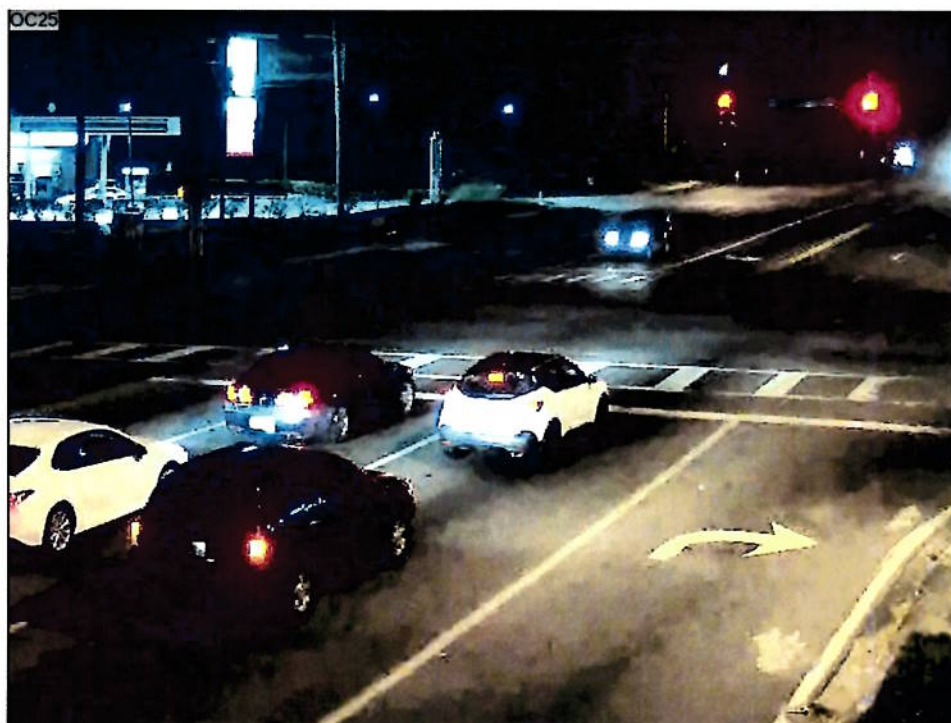
Carjacking on September 25, 2019

18. On September 25, 2019, the Orange County Sheriff Office (OCSO) responded to 6750 Forest City Rd, Orlando, Florida in response to a carjacking. At approximately 4:30 a.m., A.L. was sitting in a four-door white 2018 Toyota Camry, Florida license plate XXX5P, at the 7-11 located at 6750 Forest City Road, Orlando, Florida. While sitting in the vehicle, A.L. was approached by a black male approximately 5'11-6'0 in height, weighing approximately 165-170 lbs., with black, close cut hair, wearing a gray shirt to cover his face and black sunglasses.

19. The male approached A.L.'s vehicle and entered the vehicle from the front passenger's side door. The male proceeded to take out a black handgun and pointed it at A.L. and demanded A.L.'s cellular telephone. The male instructed A.L. to exit the vehicle while pointing the weapon at A.L. A.L. complied and exited the vehicle. The male then jumped into the driver's seat of the vehicle and drove away.

20. Surveillance footage from the 7-11 shows that just prior to the carjacking, a black sedan with large, aftermarket rims drove by the 7-11 approximately three times. Moments after the black sedan passed the 7-11 the final time, a black male is observed running from the roadway to A.L.'s vehicle. As the male leaves in A.L.'s white Toyota Camry, the black sedan with large aftermarket rims can be seen on surveillance following the Camry.

21. A.L.'s vehicle was equipped with a GPS tracking device that monitored the location of the vehicle after it was stolen. Investigators gained access to this information which assisted investigators in locating the vehicle on a red light camera at the intersection of Pine Hills Rd. and Clarcona Ocoee Rd. In the image, the stolen vehicle is located directly behind a black four-door sedan with large aftermarket rims.

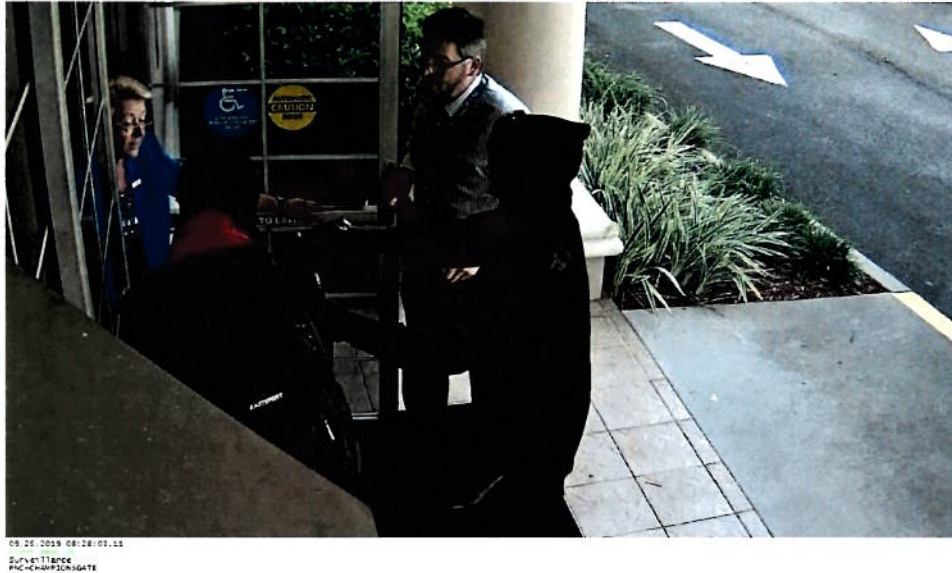


22. Later on September 25, 2019, A.L. tracked her iPhone (which she had left inside of the vehicle), using the application "Find My iPhone," which showed that her phone was located in the parking lot of the PNC Bank, located at 8321 Champions Gate Blvd., Davenport, Florida.

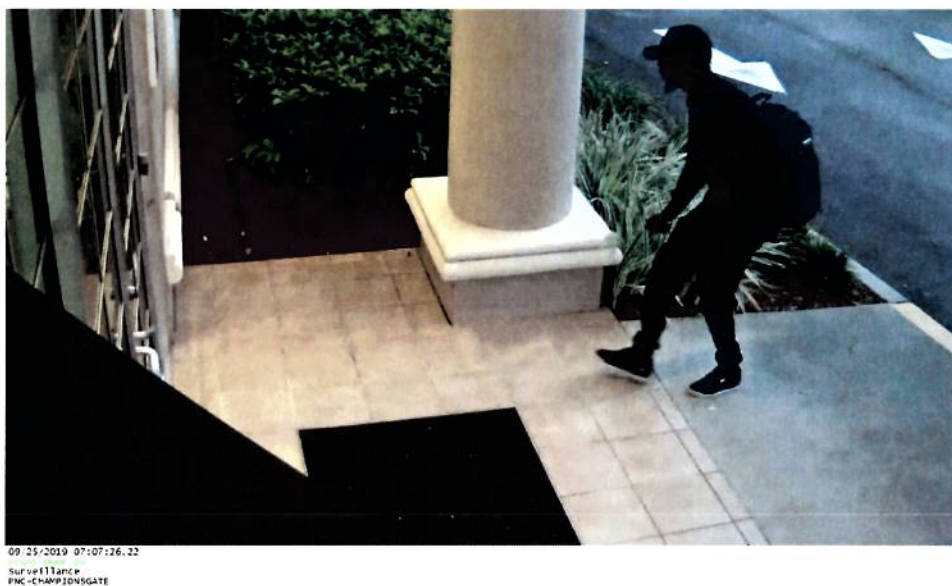
Attempted Bank Robbery of PNC Bank on September 25, 2019

23. On September 25, 2019, at approximately 8:32 a.m., the Osceola County Sheriff's Office received a call from a female who witnessed two armed males robbing the PNC Bank located at 8321 Champions Gate Blvd. in Davenport. Deputies arrived on scene about ten minutes later and spoke to the employees at the bank. The witnesses were interviewed and stated that two males, one of whom was later determined to be ARMSTRONG, entered the bank and attempted to rob them.

24. Witnesses stated that both ARMSTRONG and the other male forced one of the bank employees into the bank at gunpoint. ARMSTRONG was in possession of a silver handgun while the other male possessed a black handgun and wore a red bandana around his neck. Both males demanded that the vault be opened. The employee told both ARMSTRONG and the other male that she could not open the vault alone, and shortly thereafter the bank alarm went off. At this time ARMSTRONG and the other male panicked and ran out of the bank.



25. Video surveillance taken from the bank confirmed the information provided by the employees and witnesses. The video further showed that the two males arrived in a white Toyota Camry. When ARMSTRONG approached the bank, ARMSTRONG was unmasked and was not wearing gloves. ARMSTRONG crouched down and snuck into the bushes to wait for the employees to arrive.



26. Surveillance video also showed that the white Toyota Camry arrived in the area of the bank at about 6:30 a.m. immediately behind a black four-door sedan with aftermarket rims.



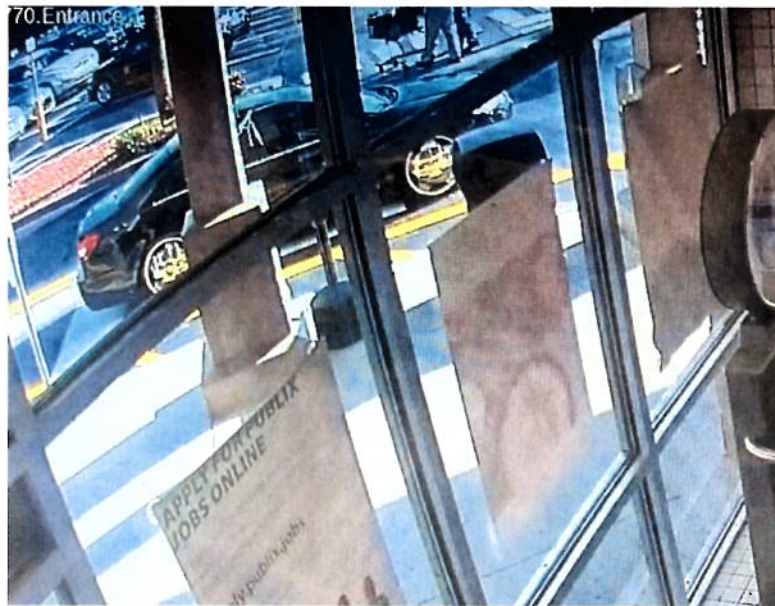
27. After the bank robbery, ARMSTRONG and the other male fled in the white Toyota Camry. The black four-door sedan was not visible on the surveillance at this time.



28. Surveillance footage from a nearby neighborhood on Masters Boulevard showed the Toyota fleeing. The video surveillance showed the vehicle making a U-turn prior to entering a parking lot. Officers from the Osceola County Sheriff's Office who went to this parking lot located the abandoned 2018 white Toyota Camry bearing Florida tag XXX5P, the same Toyota Camry that had been stolen from A.L. The location where the Toyota Camry was abandoned is approximately one mile away from the PNC bank.

29. During the investigation of the bank robbery, a witness who wished to remain anonymous approached investigators and stated that he had observed a black 2006 Zephyr with large aftermarket rims parked in the parking lot by the bank from approximately 4:00 to 6:00 p.m. the day prior to the robbery. The witness stated that nobody ever exited the vehicle while the vehicle was parked.

30. On September 24, 2019, at approximately 5:12 p.m., video surveillance footage from a nearby Publix supermarket depicted a black 2006 Lincoln Zephyr with aftermarket rims driving through the parking lot where the bank is located.



Robbery of BB&T Bank on September 26, 2019

31. On September 26, 2019, at approximately 7:51 a.m., two males, one of whom is believed to be ARMSTRONG, utilized handguns to rob the BB&T Bank located at 151 N State Road 434, Altamonte Springs, Florida.

32. On the morning of the robbery, the male believed to be ARMSTRONG and another unknown male hid in the bushes beside the bank entrance prior to the bank opening. A BB&T bank employee subsequently arrived at the bank, cleared the bank per the bank's opening procedures, and signaled to another bank employee who was parked in the parking lot that the bank was clear. The employee exited her vehicle in the parking lot and walked to the front doors of the bank. As she approached the doors of the bank, the two male suspects exited the bushes and pointed their handguns at her. The males yelled at the employee inside of the bank not to warn the police or they would kill the female bank employee. The robbers demanded that the female employee unlock the bank doors and threatened to kill her if she did not comply. The female unlocked the doors and the male suspects followed the employee into the bank at gunpoint. They threatened to kill the employees if they did not comply.

33. The male suspects demanded that the bank employees move to the bank safe and open it using their keys. The suspects took the contents of one of the opened drawers from the safe, including approximately \$22,000 in cash, as well as personal possessions belonging to the bank employees, including car keys. The male suspects then entered the white vehicle of one of the bank employees using the keys they stole and fled.

34. Video surveillance taken from the bank and surrounding businesses captured the stolen white vehicle fleeing. This surveillance shows

that as the white vehicle fled, a black, Lincoln four-door sedan with large aftermarket rims left the parking lot of an adjacent business. Both the stolen white vehicle and the black Lincoln can then be observed traveling to a nearby closed business's parking lot. Officers from the Altamonte Police Department located the stolen bank employee's vehicle just off Laurel Street at the back entrance to the closed business. A Seminole County Sheriff's Office blood hound subsequently conducted a track from the vehicle. The canine tracked approximately 10 feet.

35. The BB&T Bank's parking lot connects with parking lots of several other businesses, including the parking lots of a Target store and a Home Depot. Video surveillance taken from these businesses shows that shortly after 7 a.m. the morning of the robbery, a black four-door sedan with large aftermarket rims entered the parking lot area from an entrance off of S.R. 436. The black sedan slowly drove through the parking lot and parked in the rear of a closed business before moving to the northern portion of the Target parking lot approximately thirty to forty parking spaces from the entrance of the Target. It should be noted that at this time the Target parking lot was mostly empty. The black sedan then parked facing, and within eyeshot of, the front door of the BB&T Bank and did not move for approximately fifty minutes. Nobody entered or exited the vehicle during this time.

36. At the moment that ARMSTRONG and the second male exited the front door of the BB&T Bank, still wearing masks, the black sedan, which

was still facing and within eyeshot of the front door of the bank, can be seen on surveillance pulling forward and traveling south through the parking lot. At this time, as ARMSTRONG and the second male fled the bank in the stolen white vehicle, the black sedan travelled east in front of the Home Depot, with the stolen white vehicle also traveling east, before meeting up with the stolen vehicle at the entrance to a closed business just off Laurel Street.

37. Investigators were also able to observe in the surveillance what appeared to be part of a white arm through the front windshield of the vehicle on the driver's side as the black sedan travelled through the parking lot to the meeting location.

38. Because the vehicles moved in concert to the same location immediately after ARMSTRONG and the other male exited the bank, this is evidence that the driver of the black sedan (who was LEGG as further demonstrated below) and ARMSTRONG had discussed where to meet after they exited the bank.



39. The video surveillance taken by the BB&T Bank surveillance system captured the clothing of the males who committed the robbery. The blue shoes that ARMSTRONG was wearing as he jumped into the bushes during the attempted bank robbery of the PNC Bank were identical to the shoes worn by the male believed to be ARMSTRONG during the BB&T Bank robbery. In addition, the Eastsport black backpack carried by ARMSTRONG during the attempted PNC Bank robbery appears identical to the backpack that the male believed to be ARMSTRONG was wearing during the BB&T bank robbery. Additionally, the silver handgun that ARMSTRONG was holding during the BB&T Bank robbery appears identical to the silver

handgun used by ARMSTRONG in the previous bank robberies at the Bank of Ozarks and PNC Bank.





Additional Evidence Showing LEGG, ARMSTRONG, and the Second Male's Involvement and Planning

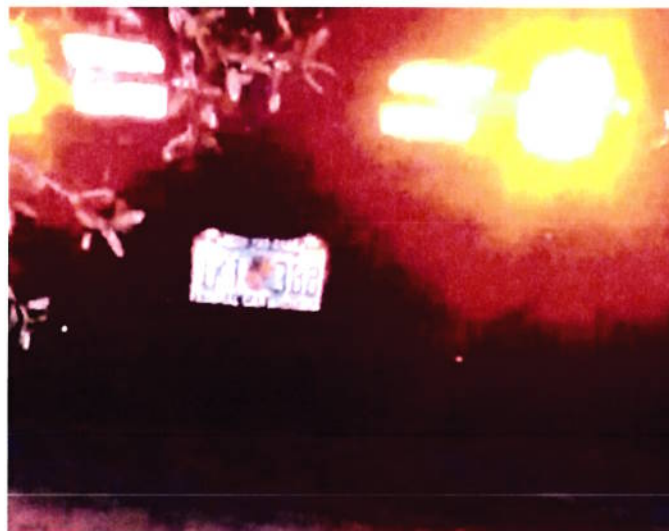
40. On September 22, 2019, a debit card belonging to ARMSTRONG was utilized at two Walmart stores in the Tampa Bay Area. The first transaction was conducted at a Walmart Supermarket located at 1505 North Dale Mabry Highway, Tampa, Florida. While at the Walmart Supermarket, ARMSTRONG and LEGG were captured on surveillance purchasing black button-down dress shirts which appear identical to the black button-down shirt worn by ARMSTRONG in the PNC attempted bank robbery and the BB&T bank robbery. ARMSTRONG, LEGG, and an unidentified black male are all captured on video surveillance walking throughout the store together. Later on September 22, 2019, ARMSTRONG,

LEGG, and the unidentified male were then captured on video surveillance at another Walmart Supermarket at 8220 N. Dale Mabry Highway, Tampa Florida 33614. While at this store, LEGG is observed on video surveillance purchasing a black hat and two black backpacks. The backpacks appear to be the same backpacks observed on the video surveillance on the attempted bank robbery of the PNC Bank and the bank robbery of the BB&T Bank. On the video surveillance in both stores, the shoes ARMSTRONG is wearing appear to be the same shoes worn by ARMSTRONG during the attempted bank robbery of the PNC Bank and the bank robbery of the BB&T Bank.





41. A check of surveillance footage of the Walmart parking lot at 8220 N. Dale Mabry Highway showed all three subjects exit the store, walk through the parking lot, and enter a black 2006 Lincoln Zephyr bearing Florida tag IK13BB.



42. Further analysis of the data tracker from A.L.'s stolen Toyota Camry showed that approximately 45 minutes after the vehicle was stolen, the stolen vehicle parked near a residence located at 3725 Guinyard Way, Orlando, Florida at approximately 5:14 a.m. on September 25, 2019. The vehicle remained parked at this location for approximately 45 minutes. Investigators conducted a canvass of surrounding neighborhood businesses for surveillance footage. Investigators located video surveillance of a black four-door sedan with large aftermarket rims arriving at a 7-11 located at 3555 Vineland Road Orlando, Florida at approximately 5:41 a.m. The 7-11 is located approximately one mile from the location on Guinyard Way where the stolen vehicle parked.

43. In the video surveillance, LEGG exited the black sedan and entered the store, where she purchased two bananas and \$4.50 worth of gas. She used a Suncoast Credit Union debit card that was later identified through bank records as belonging to ARMSTRONG, to complete the purchase. Within the bank records obtained, investigators discovered telephone number 239-672-3888. The subscriber of this telephone was LEGG.

44. Further DAVID checks revealed that LEGG's daughter has a black 2006 Lincoln Zephyr registered to her bearing Florida license plate IK13BB. This vehicle is registered at 14151 Warner Circle, North Fort Myers,

Florida—the same address which LEGG and ARMSTRONG listed as their address on their driver's licenses.

45. ARMSTRONG and the second unidentified male who assisted him in the PNC Bank and BB&T Bank robberies are similar in height, weight, and build. Investigators located video surveillance which shows that on September 25, 2019 at approximately 10:06 a.m. (*i.e.* approximately 1.5 hours after the attempted PNC Bank robbery), LEGG completed an EBT transaction at a 7-11 convenience store located at 5942 International Drive, Orlando, Florida in the amount of \$28.29. Surveillance footage from the store clearly shows LEGG and the unidentified black male purchasing items in the 7-11 store. The unidentified male—which is the same individual captured on the Wal-Mart surveillance from September 22, 2019—has a height, weight, and build that is consistent with the height, weight, and build of the unknown male who entered the PNC and BB&T banks with ARMSTRONG, and in the 7-11 surveillance the unidentified male is wearing white shoes with a distinct design near their soles that appears identical to the white shoes with the same design worn by ARMSTRONG's companion during these robberies.

46. On August 6, 2019 at approximately 11:55 a.m., a law enforcement database that captures vehicle license plates and vehicle location information captured footage of the black 2006 Lincoln Zephyr bearing Florida license plate IK13BB traveling in the Fort Myers area. This vehicle is the same make and model as the vehicle used in the bank robbery on July 31,

2019. As of August 6, 2019, the rims of the vehicle had not yet be altered and were the same as the rims on the vehicle in the surveillance footage of the robbery on July 31, 2019.

Scan Data:
 Plate # 1: IK13BB
 Plate # 2: IK13BB
 Date: 08-06-19
 Time: 11:55:41 AM GMT-05:00
 Longitude: -81.857834
 Latitude: 26.640726

Scanned By:
 Agency: Fort Myers Police Department
 User: MLK__Cranford_East_1
 System: MLK_Cranford_East_1

Output Report
Show Address



47. On August 9, 2019, at approximately 1:50 p.m., a law enforcement database that captures vehicle license plates and vehicle location information captured the black 2006 Lincoln Zephyr bearing Florida license plate IK13BB traveling in the Fort Myers area. By this time the rims on the vehicle had been changed to large aftermarket rims that appear to be the same as the rims on the vehicle utilized during the September 25, 2019 and September 26, 2019 robberies.

Vehicle Data:

Plate Image



Vehicle Image



Scan Data:

Plate # 1: IK1388
 Plate # 2: IK1388
 Date: 08-09-19
 Time: 1:50:50 PM ADT
 Longitude: -81.825849
 Latitude: 26.643181

Scanned By:

Agency: Fort Myers Police
 Department
 User: Self-sustaining Trailer 2
 System: Self-sustaining Trailer 2

Output Report

Show Address



48. Further results revealed that on September 27, 2019, the vehicle was in Fort Myers, Florida. Investigators checked toll records and discovered that the vehicle traveled from Orlando, Florida to Fort Myers, Florida on September 26, 2019.





49. A photograph taken at a toll plaza during the black Lincoln's return to Fort Meyers from the Orlando area on September 26, 2019, and later enhanced, shows that LEGG was in the front passenger seat of the Lincoln at that time and that a black male was driving the vehicle at that time:



Cellular Analysis for Robbery of PNC Bank on September 25, 2019

50. As explained, the robbery of the PNC Bank occurred on September 25, 2019 at approximately 8:32 a.m. Cellular telephone analysis was conducted on the telephone number ending in 3888 belonging to LEGG. On September 25, 2019 at approximately 4:31 a.m., LEGG's telephone connected to a tower in the vicinity of the carjacking that occurred at 6750 Forest City Road, Orlando. At approximately 5:09 a.m., LEGG's phone connected to a tower in the vicinity of 3725 Guinyard Way, Orlando, the location in which the stolen vehicle was parked. Between 7:05 a.m. and 8:25 a.m. LEGG's phone connected for approximately 12 calls and texts to a tower in the vicinity of 8321 Champions Gate Blvd., namely the location of the bank. For instance, LEGG's phone number connected to the tower in the vicinity of 8321 Champions Gate Blvd. for an incoming phone call at approximately 8:25 a.m. from phone number 239-286-2515 (which as set forth below belongs to ARMSTRONG) that lasted for approximately 6 minutes. Following the 8:25 a.m. phone call, the next phone call on LEGG's phone occurred at 9:21 a.m., which connected to a tower approximately 15 miles northwest of the bank robbery location.

51. As explained below, evidence shows that ARMSTRONG was in possession of the phone assigned phone number 239-286-2515 on October 6, 2019. In addition, the telephone records of LEGG, including phone calls between her and the number ending in 2515 at the time that ARMSTRONG

was hiding in the bushes outside of the PNC Bank and the BB&T Bank, provide further evidence that the number ending in 2515 is used by ARMSTRONG and that LEGG and ARMSTRONG were working in concert. Phone number 239-286-2515 is a prepaid phone with no subscriber information.

52. On September 25, 2019 at approximately 4:38 a.m., telephone number 239-286-2515 (ARMSTRONG's phone number) connected to a tower in the vicinity of the carjacking which occurred at 6750 Forest City Road, Orlando. At approximately 5:14 a.m. and 6:02 a.m., telephone number 239-286-2515 connected to a tower in the vicinity of 3725 Guinyard Way, Orlando, the location in which the stolen vehicle was parked. At approximately 7:19 a.m., 7:29 a.m., and 8:25 a.m., telephone number 239-286-2515 connected to a tower in the vicinity of 8321 Champions Gate Blvd, namely the location of the bank. All three calls were calls between ARMSTRONG's phone and LEGG's phone.

Cellular Analysis for Robbery of BB&T Bank on September 26, 2019

53. As explained, the robbery of the BB&T Bank occurred on September 26, 2019 at approximately 7:51 a.m. Between 6:13 a.m. and 7:47 a.m. on September 26, 2019, LEGG's phone connected to a tower in the vicinity of the BB&T Bank located at 151 N State Road 434, Altamonte Springs for approximately 20 calls and texts. Following a 7:47 a.m. text, the next phone call LEGG made was at 8:44 a.m., at which time LEGG's phone

connected to a tower located approximately nine miles south of the bank robbery location.

54. Similarly, between 7:01 a.m. and 7:46 a.m. on September 26, 2019, telephone number 239-286-2515 connected to a tower in the vicinity of the BB&T Bank for approximately four calls. Following the 7:46 a.m. call, the next phone call was at 8:24 a.m., at which time the phone connected to a tower located approximately eight miles south of the bank robbery location.

Further Cellular Analysis and Location of Black Lincoln

55. On October 4, 2019 starting at approximately 1:57 a.m., telephone pings placed LEGG's phone at 150 Herron Road, North Fort Meyers. This locational pinging had an accuracy level of within seven meters or less. Investigators began conducting surveillance on the residence at 150 Herron Road and located the black 2006 Lincoln Zephyr bearing Florida license plate IK13BB parked at 150 Herron Road. On October 4, 2019, investigators observed ARMSTRONG get into the black Lincoln after exiting 150 Herron Road and drive to a Suncoast credit union located near 150 Herron Road. After visiting the Suncoast, ARMSTRONG returned to 150 Herron Road.



56. Further cellular site analysis shows that by September 26, 2019, at approximately 8:37 p.m., both LEGG's phone and the telephone assigned the call number ending in 2515 had returned from the Orlando area to North Fort Meyers, Florida.

57. On October 6, 2019, at approximately 4:14 p.m., investigators observed ARMSTONG exit the front door of the 150 Herron Road, enter the black 2006 Lincoln Zephyr bearing Florida tag IK13BB, and drive away from the residence. ARMSTONG then travelled south across the Caloosahatchee River and into Fort Myers. As ARMSTRONG travelled south, the telephone

number ending in 2515 changed towers from north of 150 Herron Road to south of the Caloosahatchee River in the immediate area ARMSTRONG was now located. Continued surveillance showed that as Armstrong moved east through Fort Myers the telephone number ending in 2515 also moved to a tower further east. At approximately 5:44 p.m., ARMSTRONG returned to 150 Herron Road in the black Lincoln Zephyr, at which time the phone number ending in 2515 returned to the original tower north of Herron Road to which the phone number had been connecting prior to ARMSTRONG leaving 150 Herron Road. Thus, based on my training and experience, ARMSTRONG was in possession of the cellular telephone assigned the call number ending in 2515, traveled with this phone to another location, and then brought the phone back with him to 150 Herron Road.

Arrest of LEGG and ARMSTRONG on October 7, 2019

58. During the afternoon of October 7, 2019, the United States obtained a federal criminal complaint and arrest warrant for ARMSTRONG as well as federal search warrants to search the premises at 150 Herron Road and the black Lincoln Zephyr. In the evening of October 7, 2019, investigators conducting surveillance observed ARMSTRONG and LEGG loading up their belongings into two vehicles—the black Lincoln Zephyr and a 2004 gray Infiniti bearing Florida tag HNUT46. Due to the amount of belongings being loaded into the vehicles by ARMSTRONG and LEGG, they appeared to be leaving that location permanently or for an extended time

period. ARMSTRONG and LEGG then left the premises at 150 Herron Road, at which time ARMSTRONG was driving the gray Infiniti and LEGG was driving the black Lincoln. ARMSTRONG and LEGG then drove to a gas station on Pondella Road in North Fort Myers, Florida, where they were arrested.

59. Upon LEGG's arrest, Special Agent (SA) Kevin Kaufman, FBI, advised LEGG of her "Miranda Rights," at which time LEGG requested a lawyer. SA Kaufman searched the black Lincoln Zephyr bearing Florida license plate number IK13BB that LEGG drove to the gas station. While searching the vehicle, SA Kaufman located, among other things, a silver firearm on the front passenger floor of the vehicle. The firearm was located in an unzipped black and pink bag. The firearm was photographed in place and then was removed from the bag. The firearm was loaded with approximately nine rounds of .22 caliber ammunition. The firearm appears to be the same silver firearm seen in surveillance video of the Bank of the Ozarks, PNC, and BB&T bank robberies that ARMSTRONG used to commit those robberies.

60. During a search of the vehicle that ARMSTRONG was driving, the 2004 gray Infiniti, law enforcement found a relatively new black Eastsport backpack that appears to be one of the same backpacks that LEGG purchased at the Walmart store on September 22, 2019, and that was then seen in surveillance video of the attempted PNC Bank robbery and the BB&T Bank robbery.

61. Approximately thirty minutes after SA Kaufman first spoke with LEGG, LEGG requested to speak to SA Kaufman again. Prior to the interview, LEGG was asked to confirm that she had been advised of her “Miranda Rights,” and she stated she understood her rights and wanted to speak to SA Kaufman again. During the interview, LEGG told SA Kaufman that the 2006 black Lincoln Zephyr registered in the name of LEGG’s daughter belongs to LEGG. LEGG stated that the contents of the vehicle also belonged to LEGG. LEGG was asked about the silver firearm located inside the vehicle. LEGG stated that the firearm belongs to her and that she purchased it off the street for approximately \$200. LEGG, who had apparently overheard law enforcement officers speaking about needing to execute a search warrant at 150 Herron Road, also stated that law enforcement did not need to search that house and that everything they needed was in her vehicle.

**Text Messages Exchanged between LEGG and ARMSTRONG between
September 28, 2019 and October 4, 2019**

62. On October 4, 2019, Verizon wireless complied with a State-issued warrant for cellular records for telephone number 239-286-2515 (the phone number used by ARMSTRONG). The records obtained from Verizon included text message content for the period of September 28, 2019 to October 4, 2019 (but did not include text message content for any other time period).

63. On September 28, 2019, at approximately 4:59 a.m., LEGG sent an outgoing text from cellular number 239-672-3888 to ARMSTRONG that said, *"After the side of you I seen this week I'm afraid to beat you up for calling me stupid mouth anymore.....lmao."* ARMSTRONG replied, *"Wat side."* LEGG then advised, *"The devil side."* Based on my training, experience and knowledge of the investigation, I believe LEGG watched ARMSTRONG commit the two armed bank robberies and a carjacking over the course of two days on September 25th and 26th (*"After the side of you I seen this week"*). Because LEGG observed the violence that ARMSTRONG is capable of first-hand, she made the comment that she should be scared of what ARMSTRONG is capable of doing. ARMSTRONG asked LEGG to clarify (*"wat side"*) and LEGG then advised that ARMSTRONG has an evil side to his personality (*"The devil side"*).

64. On October 4, 2019, at approximately 5:21 a.m., LEGG sent an outgoing text from cellular number 239-672-3888 to ARMSTRONG at 239-286-2515 that stated, *"I meant what I said Ryde, die or kill for you. I promise you that."* ARMSTRONG then responded at approximately 5:22 a.m. *"I know u gone ride"* [sic]. LEGG then sent ARMSTRONG a text at approximately 5:25 a.m. that stated *"Nobody is gonna ride. . . . we run or die together if it comes to that. . . ."*

Interstate Nexus

65. Each of the banks listed above was insured by the Federal Deposit Insurance Corporation at the times of the aforementioned incidents.


Conclusion

66. Based on the foregoing facts and evidence, I believe that probable cause exists to charge LEGG with aiding and abetting the commission of a bank robbery on or about September 26, 2019, in violation of 18 U.S.C. §§ 2113(a) and 2.

This concludes my affidavit.


Brandon Bottom
Task Force Officer, FBI

Sworn to and subscribed to this
8th day of October, 2019.


The Honorable Nicholas P. Mizell
United States Magistrate Judge