

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America
v.
MICHAEL NELSON SNYDER

Case No.
8:20-mj-1079-T-SPF

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 December 31, 2019 in the county of Hillsborough in the Middle District of Florida, the defendant(s) violated:

Code Section 18 U.S.C. § 924(c) Offense Description Use of a firearm during and in relation to a crime of violence

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

Handwritten signature of complainant

Complainant's signature

ATF SA Nicholas Rogers

Printed name and title

Sworn to before me and signed in my presence.

Date: 1/25/2020

Handwritten signature of judge

Judge's signature

City and state: Tampa, Florida

SEAN P. FLYNN, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A COMPLAINT

I, Special Agent Nicholas Rogers of the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), being duly sworn, depose and state the following:

I. Introduction and Agent Background

1. I have been a Special Agent with ATF for approximately four years. In connection with my official duties and as defined by 18 U.S.C. § 2510(7), I am “an investigative or law enforcement officer of the United States,” empowered by law to enforce violations of federal criminal laws.

2. I began my career with the ATF as a Special Agent in October of 2015. I attended and completed the ATF Special Agent Basic Training (SABT), which led to my current position as an ATF Special Agent. In addition to my time as a Special Agent with the ATF, I have been a sworn law enforcement officer since 2005, serving with the Charlotte County Sheriff’s Office (Florida) for five years and the United States Marshals Service for five years. While employed in each of the above-described positions, I received substantial additional training in subject matters specific to each position’s requirements and challenges. I have conducted complex investigations for the past four years while assigned to the ATF Orlando Group I and ATF Tampa Group III, both Criminal Enforcement Groups.

3. In connection with my official duties as a Special Agent with ATF, I investigate a variety of criminal violations of federal laws, including crimes of violence and other firearms-related offenses, such as armed robberies. Furthermore, during these and other investigations, I have executed residential search warrants,

seized and reviewed evidence obtained during the search warrants, and consulted with other agents and law enforcement officers who have seized and/or reviewed evidence from residential search warrants. Furthermore, during these and other investigations, I have seized cellular telephones, reviewed evidence from seized cellular telephones, reviewed cell site data, and consulted with other agents and law enforcement officers who have seized and/or reviewed evidence from cellular telephones.

4. I am familiar with the facts and circumstances of this investigation either as a result of my personal involvement or as a result of other information made available to me from other sources, including investigative reports and reports from other law enforcement personnel. Thus, the information provided herein is based upon this combined knowledge as well as my experience and background. This affidavit is intended only to show that there is probable cause for the issuance of a criminal complaint against **MICHAEL NELSON SNYDER** for the crime of use of a firearm during a crime of violence, in violation of 18 U.S.C. § 924(c).

II. Statement of Probable Cause

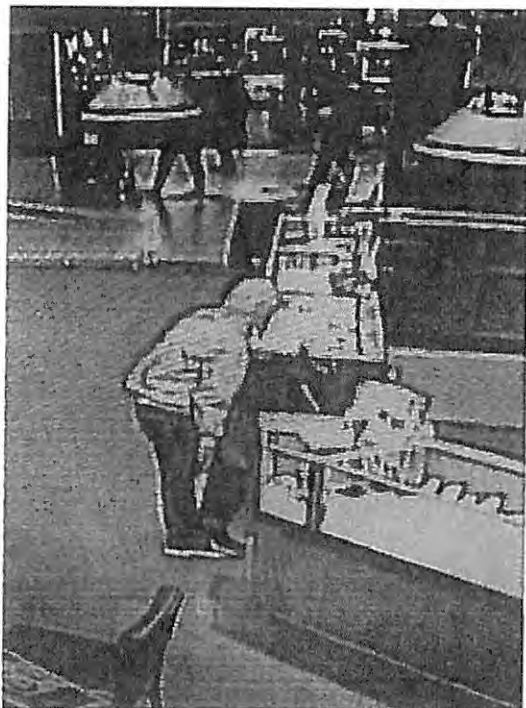
5. ATF, the Hillsborough County Sheriff's Office (HCSO) and the Pasco County Sheriff's Office (PCSO) conducted a joint investigation involving 18 U.S.C. § 1951, interruption of commerce by threats or violence (Hobbs Act Robbery), which occurred on or about December 31, 2019, at the Zales Jewelry Store, located at 2251 University Square Mall, Tampa, Florida, and a second armed robbery that occurred

on or about January 19, 2020, at the Helzberg Diamonds, located at 2382 Grand Cypress Dr, Suite 985, Lutz, FL.

6. On December 31, 2019, at approximately 10:40 am, an unknown white male suspect entered the Zales Jewelry Store located at 2251 University Square Mall, Tampa, Florida, carrying a black backpack with a hooded sweatshirt over his head. Said suspect brandished an unknown make/model black handgun and pointed it at two employees in the store. The suspect demanded one of the employees to the ground and the other to assist in loading the backpack with jewelry. The targeted jewelry case consisted of men's rings. The victims, in fear for their lives, complied with the suspect's demands.

7. The suspect fled the scene on foot towards the parking lot on the south side of the mall where he entered an unknown make/model silver or white sedan that drove eastbound on Fowler Ave East. During the commission of the robbery, 69 men's rings valued over \$100,000 total, were stolen.

8. Surveillance video from the armed robbery of the Zales was obtained. The surveillance video and victim accounts revealed the suspect as a white male, approximately 20-25 years of age, approximately 5'5" to 5'8" tall, medium build, wearing a white or light hooded sweatshirt, dark grey sweatpants with a white logo on the left thigh area, black and white athletic shoes with what looked like a black smart watch, possibly an Apple iWatch on his left wrist. The suspect was not wearing gloves. See attached photographs.



9. The surveillance video showed the suspect walking south to north, just outside the Zales Jewelry Store, and enter the Zales Jewelry Store from the northeast.

It showed the suspect pull the aforementioned black handgun from his right pocket and point it at the victims. One victim can be seen on the ground while the other loaded the backpack up with rings. The suspect is seen going back and forth between the victim on the ground and the victim loading the backpack with jewelry. The suspect can be seen transferring the firearm from one hand to the other several times and pointing it at the victims. The suspect can be seen touching the counter top with his bare hands. The suspect can also be seen putting the firearm back in his pocket prior to obtaining the backpack from the victim who loaded it with jewelry. The male suspect can then be seen fleeing the Zales Jewelry Store towards the exit on the south side of the mall.

10. HCSO crime scene technicians responded to the scene and recovered an edge palm print and/or fingerprint and DNA swabs from the counter. One of the victims stated they cleaned the area of the counter the suspect touched that same morning just before the robbery. The edge palm print and/or fingerprint is of good enough quality for comparison to a known suspect. HCSO submitted the edge palm print and/or fingerprint to the Integrated Automated Fingerprint Identification System (IAFIS) which returned negative results.

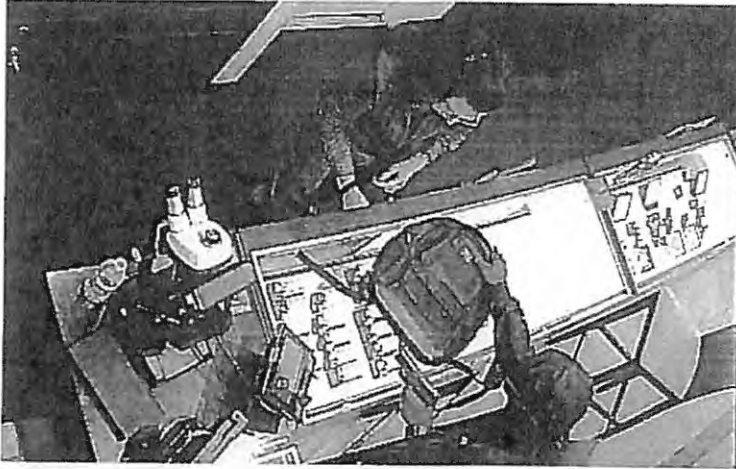
11. On January 19, 2020, ATF SA S. Brooks responded to the Helzberg Diamonds regarding an armed robbery that occurred earlier that same day. SA Brooks met with PCSO Detectives who advised an unknown white male suspect carrying a black backpack with a hooded sweatshirt over his head, entered the Helzberg Diamonds, brandished an unknown make/model black handgun and

demanded jewelry. The victims, in fear for their lives, complied with the suspect's demands and put jewelry in the suspect's backpack. Prior to leaving, the suspect told the victims not to follow him because he had a bomb.

12. The suspect fled the scene on foot towards the parking lot on the West side of the store where he entered a silver vehicle and further fled the area. During the commission of the robbery, jewelry valued over \$275,000, was stolen.

13. Surveillance video from the Helzberg Diamonds during the armed robbery was obtained. The surveillance video and victim accounts revealed the suspect as a white male, approximately 20-26 years of age, approximately 5' 6", medium build, wearing a dark hooded sweatshirt, dark grey sweatpants with a darker colored stripe down the side, black and white athletic shoes, a black smart watch, possibly an Apple iWatch on his left wrist, sunglasses and blue gloves. See attached photographs.





14. The surveillance video showed the suspect enter the Helzberg Diamonds from the North West entrance and walk toward the rear of the store. It showed the suspect pull the aforementioned black handgun from his right pocket and point it at the victims. It further showed the suspect put one victim on the ground and demand the other to load the backpack with jewelry. The suspect can be seen

placing the aforementioned handgun into the backpack, closing the backpack and fleeing the store out of the North West entrance. The suspect appeared to run toward the parking lot on the North West side of the mall.

15. Witnesses observed the suspect get into a silver four door Cadillac and flee the scene toward the south of the mall parking lot. While investigators were on scene, a witness came forward with vehicle dash camera video footage of the suspect vehicle. A review of said dash camera video showed a silver four door Cadillac sedan (later identified via Cadillac representatives as either a 2018 or 2019 Cadillac XTS) traveling eastbound (generally) on Sun Vista Dr toward the mall. The witness with the dash camera video pulled behind the suspect vehicle at which time it caught the rear of the vehicle. As the witness vehicle got closer, the video revealed the tag was covered by what appeared to be a decorative FSU (Florida State University) plate, such as one that would go on the front of a vehicle. Said decorative FSU plate appeared to be taped over where the legitimate license plate/tag would go.

16. SA Rogers compared the video from the robberies of the Zales Jewelry Store and the Helzberg Diamonds. SA Rogers noted the suspects' stature appeared to be similar in both incidents. The suspects' modus operandi and type of clothing used to conceal himself were also similar in both incidents. Of note, were the suspects' shoes and backpack, which appeared to be the same in both incidents.

17. Both the Zales Jewelry Store and Helzberg Diamonds are businesses that conduct interstate commerce as a regular part of their operations. Both are headquartered outside the state of Florida.

18. On January 21, 2020, HCSO Det. G. Elser notified SA Rogers he received a call from the aforementioned Zales Jewelry Store who advised the Zales Jewelry Store located at 28211 Paseo Drive #180, Wesley Chapel, FL, had a person in their store earlier that day who matched the description and stature of the aforementioned suspect. SA Brooks responded to the Zales Jewelry Store located at 28211 Paseo Drive #180, Wesley Chapel, FL, where he made contact with witness A.S., who advised that he/she had seen video of the Zales robbery on the news and thought that the person in question appeared to be of the same stature as the robber and thought he wore similar shoes. A.S. advised the subject said he was looking for a diamond ring for his girlfriend and also asked if they had Rolex watches, which they advised they did not. The suspect said "that's too bad". SA Brooks reviewed and subsequently recovered the surveillance video of the subject for further investigation.

19. On January 23, 2020, while reviewing historical surveillance video footage from the Zales Jewelry Store (2251 University Square Mall, Tampa, Florida) on December 30, 2019, ATF Agents observed an unknown white male subject matching the description of the robber enter the store at approximately 10:39 am with his hands in his pockets. The subject looked at several of the jewelry cases as he walked around the business. The subject spent some time at the targeted jewelry case. The subject continued to walk around the store and eventually came back to the targeted case to look again.

20. Further review of the video footage showed the subject wearing a grey sweatshirt with a white logo (similar to the logo on the sweatpants the suspect wore

in the first armed robbery), black and white athletic shoes similar to the ones worn in both armed robberies. The unknown white male subject had blonde hair that appeared to be in a short ponytail on top of his head with the sides of his head shaved. See attached photographs.





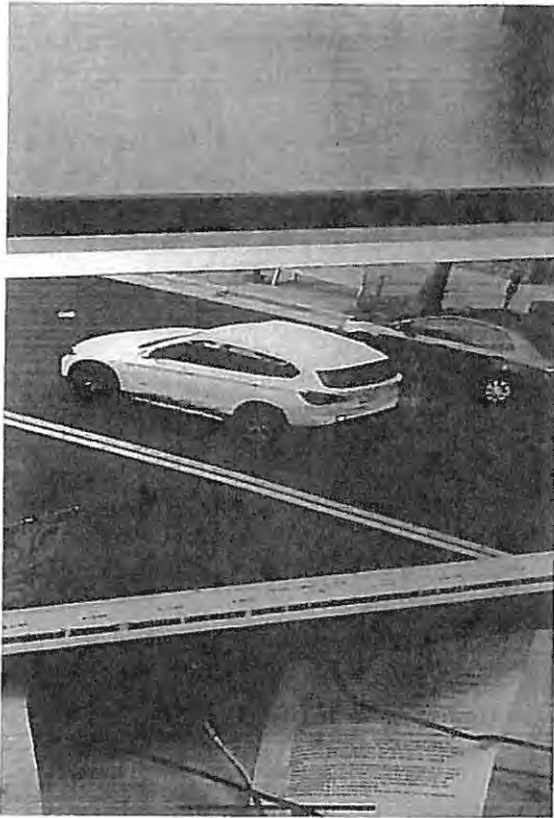
21. On January 23, 2020, SA Brooks compared the videos of the non-disguised subject from the Zales at the Wiregrass mall and the University Square mall and determined the subject in videos was the same person. On this same date,

ATF Agents, assisted by PCSO Detectives, responded to the Wiregrass Mall.

Investigators reviewed surveillance footage from Wiregrass Mall's security department regarding the similar subject in the Zales store on January 21, 2020.

Investigators were able to locate and follow the subject via the surveillance video as he left the Zales Jewelry Store and entered into a white BMW Sport Utility Vehicle (SUV). A partial tag was obtained. See attached photographs.







22. Law Enforcement Database checks for the partial tag revealed a white BMW SUV bearing Florida tag LPTM23, registered to Madeline Renee Deutsch. Further queries of Law Enforcement Databases revealed a white male subject named **MICHAEL NELSON SNYDER** associated with Deutsch. Investigators were able to positively identify **SNYDER** via his Florida Driver and Vehicle Information Database (DAVID) photograph as the person in both Zales Jewelry Store's surveillance videos, specifically on December 30, 2019 at the at University Square Mall location and January 21, 2020 at the Wiregrass Mall location. **SNYDER's** address in DAVID was listed as the [REDACTED], Tampa, FL. In

DAVID, on or about July 19, 2019, SNYDER provided mail as proof of residence at that address. See attached photographs.

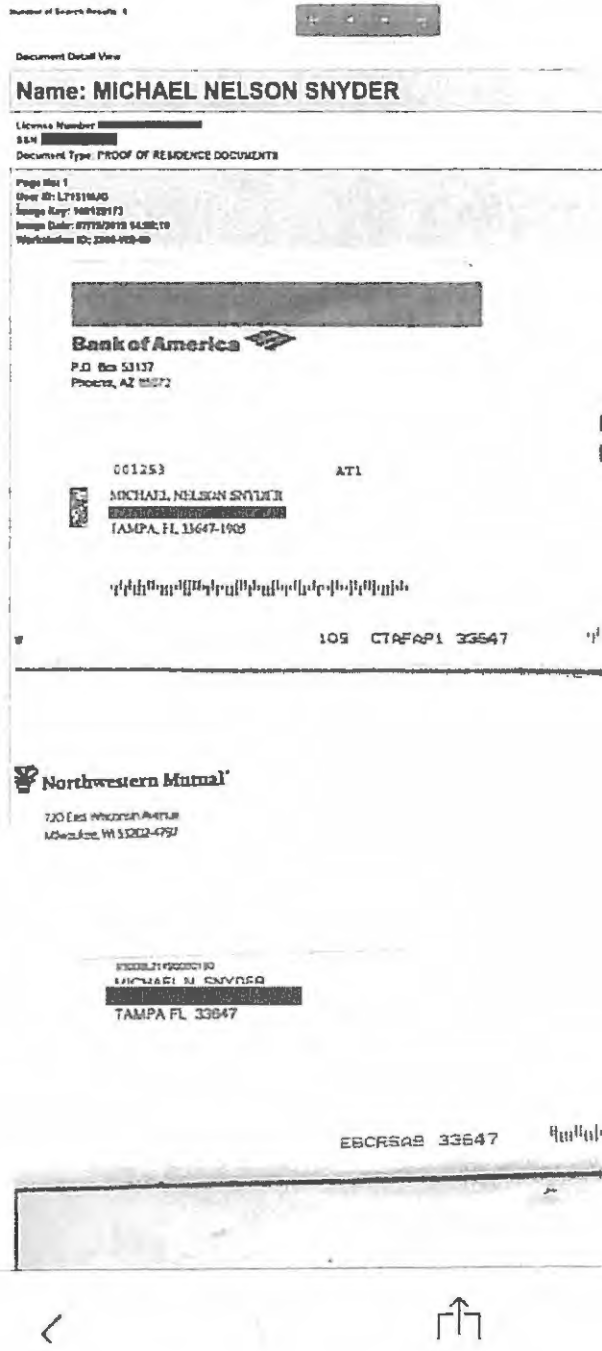
Record Detail

MICHAEL NELSON SNYDER DLID: [REDACTED]
Class: E
Previous DL: 0

ORGAN DONOR
SAFE DRIVER
REAL ID COMPLIANT

Address: TAMPA, FL 33647-1905	Date of Birth: [REDACTED]
Original License Issue Date: 10/11/2006	Issued: 09/26/2012
CDL Status:	
Form Number: [REDACTED]	
Citizen Status: US CITIZEN	Country of Birth: US OF AMERICA
Race: CAUCASIAN	



23. On January 23, 2020, at approximately 8:30 pm, ATF Agents and Investigators set up surveillance at the above-noted address for SNYDER. A short time later, SNYDER was observed walking down the street past that home. Later

that evening, at approximately 9:56 pm, ATF SA Y. DesLauriers observed **SNYDER** exit the home to let a dog out, after which he went back inside.

24. On January 23, 2020, a law enforcement database check was conducted that revealed a possible business named White Coat Planner LLC in **SNYDER's** name at his above-noted home. On January 24, 2020, SA Rogers searched Sunbiz.org, Division of Corporations, an official State of Florida website that listed **SNYDER** as the registered agent for White Coat Planner LLC and that home as the principal address for White Coat Planner LLC. The status of the company was active. On January 24, 2020, SA Rogers contacted Tampa Electric Company (TECO) who confirmed they serviced the home. A TECO representative advised the customer's name at the home was Irving Esbitt. A check of **DAVID** revealed no customer named Irving Esbitt.

25. The BMW SUV described above is registered to **SNYDER's** sister. As discussed above, surveillance video shows that **SNYDER** uses this car, apparently to case future robbery locations. On January 24, 2020, officers on surveillance saw this BMW parked outside the above-noted home and saw **SNYDER** get inside it and drive off. No one else was in the car.

26. On January 24, 2020, law enforcement obtained and executed search warrants for the above-noted home and the above-noted BMW SUV.

27. In the BMW, officers found a black handgun in the glove box. In comparing the recovered handgun to video surveillance of the above-noted robberies,

the black handgun appears to be similar to the handgun used in the robberies. Also in the glove box were blue gloves, which appear similar to the gloves worn during the Helzburg Diamonds robbery.

28. In the home, officers found clothing matching the clothing worn by the robber during the robberies. For instance, officers found black Apple iWatches in SNYDER's bedroom. Nike pants similar to those worn during the Helzburg robbery were also found in the house.

29. SNYDER's grandfather was present during the execution of the search warrant. Officers showed him video from the Helzburg robbery, and he recognized the robber's shoes, backpack, and jacket as looking similar to items that SNYDER has. Additionally, he recognized the robber's walk was similar to the way SNYDER walks, and he said the robber's height and build was similar to SNYDER's, though he would not identify the robber as SNYDER, in light of the robber's disguise. He also said that a silver Cadillac was parked at the home earlier that week. As noted above, a silver Cadillac was the getaway car for the Helzburg Diamonds robbery, which occurred five days before the interview with the grandfather.

30. On January 24, officers also took SNYDER's fingerprints, pursuant to a federal warrant. An HCSO forensic print analyst confirmed that SNYDER's fingerprint matched a fingerprint that was recovered from the counter after the Zales robbery. As discussed in paragraph 9–10, surveillance video from that robbery

shows the robber touching the counter with his bare hand, and a Zales employee/ robbery victim stated that she had cleaned that counter just before the robbery.

31. In a post-*Miranda* interview, **SNYDER** denied committing the robberies. Notably, he also denied having been to the Zales in the University Square Mall, which was robbed on December 31, in the last two months, and he denied having even been to that mall in the last two months. This statement is obviously incompatible with his fingerprint being recovered from that Zales's counter.

Conclusion

32. Based upon the foregoing, I respectfully submit that there is probable cause for the Court to issue the requested criminal complaint.



Nicholas Rogers, Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to and subscribed before me
this 25 day of January, 2020.



SEAN P. FLYNN
United States Magistrate Judge