

UNITED STATES DISTRICT COURT

for the

United States of America  
v.  
MAWDO MALICK SALLAH and  
KIRK DOUGLAS JOHNSON

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Case No.

8-20MJ1321JSS

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 unknown through 3/22/2020 in the county of Pinellas and elsewhere in the Middle District of Florida and elsewhere, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 844(n)	Conspiracy to commit arson

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

  
 Complainant's signature  
 ATF SA Yannick Deslauriers  
 Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 via telephone or other electronic means.

Date: March 22, 2020

  
 Judge's signature  
 JULIE S. SNEED, U.S. MAGISTRATE JUDGE  
 Printed name and title

City and state: TAMPA, FLORIDA

## AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Yannick Deslauriers, being duly sworn, depose and state:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), and have been so employed by the United States Department of Justice since January 2009. I have approximately 20 years of law enforcement training and experience. This training and experience includes, but is not limited to, the earning of a Bachelor of Science Degree in the field of Criminal Justice with a minor in Psychology from the University of Tennessee, and the completion of the Metropolitan Nashville Police Academy. I was subsequently employed with the Metropolitan Nashville Police Department in Nashville, Tennessee for approximately nine years, including four years assigned to a street level narcotics unit. Upon being hired by ATF, I completed the Federal Law Enforcement Training Center's Criminal Investigator Training Program and ATF Special Agent Basic Training program.

2. I am authorized to investigate violations of laws of the United States, including violent crimes and narcotic offenses, and to execute warrants issued under the authority of the United States. I am currently assigned to the ATF Tampa Division. During my employment as an ATF Special Agent and nine previous years as a police officer and detective with the Nashville Police Department, I have participated in numerous investigations which have resulted in the arrests of numerous individuals and the seizures of currency, financial ledgers, firearms, controlled substances, and indicia of controlled substance trafficking. During the

course of these investigations, I have conducted or participated in physical and electronic surveillance, and I have conducted numerous debriefings of informants, cooperating defendants, and other individuals cooperating with the United States. I have executed or assisted in executing numerous search warrants resulting in the seizure of firearms, narcotics, narcotics records, and financial documents.

3. I submit this affidavit in support of a criminal complaint charging Mawdo Malick SALLAH (“SALLAH”) and Kirk Douglas JOHNSON (“JOHNSON”), with conspiracy to commit arson in violation of 18 U.S.C. § 844(n).

4. This affidavit is based on my personal knowledge, information from fellow law enforcement officers, and other reliable sources. Because of the limited purpose of this affidavit, however, I have not included each and every fact known to me, but only those facts that I believe are necessary to establish probable cause in support of the requested complaint.

#### **PROBABLE CAUSE**

5. ATF, the Pinellas County Sheriff’s Office (PCSO), and the Hillsborough County Sheriff’s Office (HCSO) are conducting a joint investigation involving ATM arsons in violation of 18 U.S.C. § 844(i) occurring on or about December 22, 2019, at the Pilot Bank, located at 12471 W. Linebaugh Ave, Tampa, FL, an ATM-related vandalism occurring on or about December 8, 2019, at the Chase Bank, located at 11650 Countryway Blvd, Tampa, FL, an ATM arson in violation of 18 U.S.C. § 844(i) occurring on or about November 4, 2019 at the BB&T located at 3902 Tampa Road, Oldsmar, FL, two attempted ATM-related

vandalisms occurring on July 7, 2019 and September 3, 2019, and a final ATM arson in violation of 18 U.S.C. § 844(i) occurring on January 12, 2020, all occurring at the Regions Bank, located at 3522 Bell Shoals Rd, Valrico, FL 33596.<sup>1</sup>

6. On December 22, 2019, ATF SA A. Blake Childress responded to a post-blast investigation of an Automated Teller Machine (ATM) and attempted theft at the Pilot Bank located at 12471 W Linebaugh Ave, Tampa, FL.

7. SA Childress met with Detectives Joanna Bussa and Deputy Don Sarginson of the HCSO. Detective Bussa stated at around 4:22 a.m., an alarm of an ATM machine at the Pilot Bank located at 12471 W Linebaugh Ave, Tampa, FL, generated a call for service. At approximately 4:31 a.m., HCSO deputies arrived at the location of the alarm and observed an ATM machine destroyed by an explosive blast and debris scattered all throughout the parking lot.

8. HCSO personnel began documenting the scene. Detectives observed debris to be scattered a significant distance from the blast location. ATF and HCSO personnel began examining the scene, once HCSO personnel completed documenting the scene. SA Childress and Detective Bussa observed six cameras and teller call buttons spray painted with a black spray paint. There were several items marked for further examination. Deputy Don Sarginson requested that an ATM technician enter the crime scene to determine if items belonged to the ATM or were from outside sources. The majority of the items marked and photographed were

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1. Vandalism of an ATM does not appear to be a federal crime. Evidence regarding these vandalisms is relevant, however, to the investigation of the arsons, given the similarity in the vandalisms to preparatory work done during the arsons.

described by Acosta to belong to the ATM machine. HCSO Forensics collected several pieces of evidence and swabs from internal components of the ATM as well as nearby structural supports to be sent to the ATF lab for further examination.

9. SA Childress, Detective Bussa and Deputy Sarginson reviewed the surveillance footage from the bank's camera system. Cameras show a single suspect wearing a dark hoodie sweatshirt, black ski mask, black gloves, black pants and black shoes. The suspect was carrying a spray paint can used to paint camera lenses, but did not appear to be carrying anything else. The first picture of the suspect was taken at 3:11 a.m. In the following moments, the suspect is witnessed spray painting all six of the bank's external cameras.

10. Pilot Bank located at 12471 W Linebaugh Ave, Tampa, FL, is federally insured by the Federal Deposit Insurance Corporation (FDIC) and is a business that conducts interstate commerce as a regular part of its operations.

11. The source of the explosion was most likely a flammable fuel (to include a gas or vapor) injected into the internal components of the ATM. The ignition could simply be a spark, but cause of the generation of the electrical spark is unknown. Deputy Sarginson found a length of wire and a small amount of electrical tape which leads investigators to believe an electrical initiator was used to initiate the explosion. Items were collected for ATF forensics to determine what type of ignitable component was used.

12. All cash and checks were found still present in the ATM machine, which were counted and documented by Pilot Bank personnel. SA Childress spoke

with the Compliance Manager for Pilot Bank. The manager stated the ATM contained \$26,380.00 and that there was no lost or missing cash.

13. On January 3, 2020, Det. Bussa advised SA Childress that HCSO deputies responded to a similar incident on December 8, 2019, at the Chase Bank, located at 11650 Countryway Blvd, Tampa, FL. Det. Bussa explained that Patrol Deputy Jonathan Carpenter was summoned to the Chase Bank at approximately 7:06 p.m. by a complaint stating the bank's ATM had been damaged. Upon arriving, Deputy Carpenter observed the ATM's camera as well as other parts of the device were covered in black paint and noted it appeared to be done in an intentional and malicious manner. Due to there being no other observable damage nor any items missing, neither investigators nor forensic personnel responded to the scene to preserve physical evidence.

14. On the same date, SA Childress and Det. Bussa were provided photographs of the incident. These photographs were taken from Chase Bank surveillance cameras and provided to law enforcement by a Chase Bank Security Specialist. The photographs showed a single suspect enter the camera frame at approximately 2:46 a.m. wearing a dark colored hoodie sweatshirt, pants, mask, gloves and tennis shoes. Between 2:46 a.m. and 3:02 a.m., the individual was observed to walk back and forth in front of the ATM several times. The individual spray painted the ATM camera and then retrieved a dark colored backpack, which the suspect carried on his/her right shoulder. The individual placed the backpack around the side of a structural support, which is just out of view of the camera. The

individual retrieved a hose or cord from the area of the backpack and returned to the front of the ATM. The individual knelt down in front of the machine in a way that is unusual for normal use. Finally, the individual gathered the hose or cord and left the view of the camera on foot.

15. Chase Bank, located at 11650 Countryway Blvd, Tampa, FL, is federally insured by the Federal Deposit Insurance Corporation (FDIC) and is a business that conducts interstate commerce as a regular part of its operations.

16. SA Childress reviewed the video from Pilot Bank and compared it to the images from Chase Bank. SA Childress noted that the individual's stature appeared to be similar as well as the clothing worn during both incidents. At both scenes, the bank's exterior surveillance cameras were spray painted black. Surveillance footages shows that both cans of spray paint were light in color with a dark horizontal band around the can near its midline. Within this dark, possibly blue band, a clear and distinct "2" can be seen in a light color just to the right of where the band begins on the left side of the label.

17. On January 10, 2020, HCSO Intelligence Analyst Jesse Swiney made SA Childress aware of two prior ATM-related vandalisms, which took place at Regions Bank located at 3522 Bell Shoals Rd, Valrico, FL on July 7, 2019 and September 3, 2019.

18. On July 7, 2019, HCSO deputies were summoned to the Regions Bank by Technician Blain Baker who advised the ATM camera lens had been painted as well as internal parts damaged by an unknown tool. Regions Bank Corporate

Security personnel provided still images taken from the bank's surveillance camera system. Upon reviewing these images, surveillance footage depicts two (2) suspects dressed in dark clothing, to include hooded sweatshirts, pants, masks and gloves at approximately 03:56 a.m. The images show the suspects painting a surveillance camera lens located just above the ATM machine itself as well as interacting with the display area of the ATM.

19. Technician Baker informed the HCSO deputy that all cash and checks were found still present in the ATM, and confirmed suspects were not able to steal anything.

20. On September 3, 2019, HCSO deputies were dispatched to the Regions Bank in reference to the ATM being vandalized. Upon arriving, deputies observed the surveillance cameras to be covered with spray paint but were unable to determine if this was a new occurrence or if it was residual damage that had not been fixed from the July 7, 2019 incident. Again, Regions Bank Corporate Security personnel provided still images taken from the bank's surveillance camera system. The images capture a single suspect wearing dark clothing, to include a dark hooded sweatshirt, dark mask, dark gloves, dark pants, and dark shoes with a light strip around the sole at approximately 03:08 a.m. The suspect was observe carried a light colored can of spray paint in hand before obstructing the cameras.

21. On November 4, 2019, ATF SABT Christopher J. Nicolussi and Explosive Enforcement Officer (EEO) Kevin Miner responded to a post blast

investigation of an ATM machine and theft of several thousands of dollars at the BB&T Bank located at 3902 Tampa Road, Oldsmar, FL 34677.

22. SABT Nicolussi met with Pinellas County Detective Kavanagh Pinellas County Sheriff's Office (PCSO). Detective Kavanagh stated sheriff's deputies on patrol were having a meeting in a parking lot within audible distance of the explosion. PCSO deputies stated they heard an explosion more intense than that of an electrical transformer around 3:20-3:21 a.m. on November 4, 2019. PCSO deputies attempted to locate the origin of the explosion. Around 3:27 a.m., a seismic alarm of an ATM machine at the BB&T Bank located at 3902 Tampa Road, Oldsmar, FL, 34677 generated a call for service. PCSO deputies arrived at the location of the alarm and observed an ATM machine destroyed by an explosive blast and debris scattered all throughout the parking lot.

23. PCSO detectives, with the assistance of PCSO Forensics, began documenting the scene. Detective Kavanagh described debris stretching more than 200 feet from the blast location. ATF, FBI, PCSO and DFS personnel began examining the scene once PCSO Forensics were complete documenting the scene. SABT Nicolussi observed several cameras and teller call buttons spray painted with a blue spray paint. There were several items marked for further examination. SABT Nicolussi requested that an ATM technician enter the crime scene to determine if items belonged to the ATM or were from outside sources. The majority of the items marked and photographed were described by the technicians belonging to the ATM

machine. PCSO Forensics collected several pieces of evidence and swabs from internal drawers of the ATM to be sent to the ATF lab for further examination.

24. Detective Kavanagh received still images of surveillance footage from an area operations officer branch leader for BB&T via e-mail. The suspect was identified as a single person wearing a dark gray or light black jacket with a hoodie, black ski mask, black gloves, black pants and brown boots. The suspect was carrying a spray paint can used to paint camera lenses, but did not appear to be carrying anything else. The first picture of the suspect was taken at 3:15 a.m. At 3:16 a.m., the suspect is seen spray-painting the camera lens on the ATM machine. At 3:18 a.m., the suspect is seen spray-painting the camera above the ATM machine.

25. The source of the explosion was most likely a flammable fuel injected into the internal components of the ATM. The ignition could simply be a spark, but it is unknown the generation of the electrical spark. Investigators found no indicators on-scene of the item used to initiate the explosion nor the type of fuel used. Items were collected for ATF forensics to determine what type of ignitable liquid was used.

26. Remaining cash and checks were found still present in the ATM machine, which were counted and documented by PCSO Forensics. Detective Kavanagh spoke with the Branch Manager for BB&T. Mendoza stated the banks current loss of cash from the ATM machine totaled \$29,920.

27. The BB&T bank located at 3902 Tampa Road, Oldsmar, FL is federally insured by the Federal Deposit Insurance Corporation (FDIC) and is a business that conducts interstate commerce as a regular part of its operations.

28. On January 12, 2020, ATF SA A. Blake Childress responded to a post-blast investigation of an Automated Teller Machine (ATM) and attempted theft at the Regions Bank located at 3522 Bell Shoals Rd, Valrico, FL.

29. SA Childress met with Detectives Jacob Smith of the HCSO. Detective Smith stated at around 6:09 a.m., a complainant called 911 and notified law enforcement the ATM machine at the Regions Bank located at 3522 Bell Shoals Rd, Valrico, FL, had been destroyed. At approximately 06:27 a.m., HCSO Deputy Paul Baez arrived at the location of the alarm and observed an ATM machine destroyed by an explosive blast and debris scattered all throughout the parking lot.

30. HCSO personnel with the assistance of HCSO Forensics began documenting the scene. Detectives observed debris to be scattered a significant distance from the blast location. ATF and HCSO personnel began examining the scene, once HCSO Forensics were complete documenting the scene. SA Childress observed two surveillance cameras and several teller call buttons spray-painted with a black spray paint. SA Childress noted that the two surveillance cameras also had an amount of blue spray paint underneath the black paint that was consistent with the two prior incidents documented at the location by HCSO deputies. There were several items marked for further examination. SA Childress requested the ATM technician Brian Shure enter the crime scene to determine if items belonged to the

ATM or were from outside sources. The majority of the items marked and photographed were described by Shure to belong to the ATM machine. HCSO Forensics collected several pieces of evidence and swabs from internal components of the ATM as well as nearby structural supports to be sent to the ATF lab for further examination.

31. Two Regions Bank Corporate Security Officers responded to the scene and provided SA Childress with still shots taken from the bank's surveillance cameras. Upon reviewing these photographs, SA Childress observed the ATM camera to capture a single suspect dressed in a dark hooded sweatshirt; a dark mask and dark gloves utilize a light spray can to paint the camera lens at approximately 3:53 a.m. The suspect was carrying a spray paint can used to paint camera lenses, but did not appear to be carrying anything else.

32. Regions Bank located at 3522 Bell Shoals Rd, Valrico, FL, is federally insured by the Federal Deposit Insurance Corporation (FDIC) and is a business that conducts interstate commerce as a regular part of its operations.

33. The source of the explosion was most likely a flammable fuel (to include a gas or vapor) injected into the internal components of the ATM. The ignition could simply be a spark, but cause of the generation of the electrical spark is unknown. Technician Shure located a rubber hose that he claimed was a foreign object and did not belong to the ATM. Blue shop towels and other ATM internal parts were observed to have a thick black substance covering the surfaces that were also noted to be foreign objects. Items were collected for ATF forensics to determine what type of ignitable component was used.

34. Remaining cash and checks were found still present in the ATM machine, which were counted and documented by Regions Bank Corporate Security Officers before turning money over to Loomis personnel. SA Childress spoke with Corporate Security Officers Marscher and Wilson who stated the banks current loss of cash from the ATM machine totaled \$39,380.

35. This Court has authorized ATF to obtain various information for cell-towers in the vicinity of the above-noted ATM arsons. These records concern information from these towers during and near the time of the arsons and vandalisms on July 7, 2019, September 3, 2019, November 4, 2019, December 8, 2019, December 22, 2019, and January 12, 2020.

36. ATF has since received the requested cell-tower records. Subsequent analysis of the data revealed the following tower connections for specific incidents.

37. As to the September 3, 2019, ATM-related vandalism at Regions Bank, at approximately 3:08 a.m., a cell phone with call number (813) 203-8198 made an outgoing call to another cell phone with call number (305) 316-6659 at 2:50 a.m. The call lasted approximately 41 minutes. Both cellphones connected to a cell tower in the vicinity of the vandalism.

38. Regarding the November 4, 2019, ATM arson at BB&T Bank at approximately 3:15 a.m., a cell phone with call number (864) 359-8306, made two outgoing calls to (813) 203-8198; one at 2:47 a.m., lasting 4 minutes and 52 seconds; the second at 2:52 a.m., lasting 6 seconds. (813) 203-8198 made an outgoing call to

(864) 359-8306 at 2:52 a.m., lasting 45 minutes and 34 seconds. Both cellphones connected to a cell tower in the vicinity of the successful ATM explosion.

39. As for the January 12, 2020, ATM arson at Regions Bank at approximately 4:00 a.m., (864) 359-8306 made an outgoing call to (813)-203-8198 at 3:40 a.m., lasting 28 minutes and 48 seconds. Both cellphones connected to a cell tower in the vicinity of the successful ATM explosion.

40. Subscriber information from AT&T revealed that the subscriber for (864) 359-8306 is Harriett Johnson, who is Kirk Douglas JOHNSON's mother. As explained below, Kirk Douglas JOHNSON is believed to be the user of this phone ("JOHNSON's phone").

41. A database query for (813) 203-8198 revealed the cellphone number belonged to Mawdo SALLAH. Additionally, SALLAH provided (813) 203-8198 ("SALLAH's phone") as his contact number during an HCSO DUI arrest on January 18, 2020. A Florida Driver and Vehicle Information Database query revealed SALLAH's address as 2966 Drew Street, Apartment 935, Clearwater, Florida 33759. SALLAH is the registered owner of two vehicles; one of which is a 1997 green Mercury Grand Marquis bearing Florida tag ADX-B55. SALLAH's address is approximately 34 miles from the Regions Bank located at 3522 Bell Shoals Road, Valrico, Florida and is approximately 7 miles from BB&T Bank located at 3902 Tampa Road, Oldsmar, Florida.

42. As for the July 7, 2019, ATM-related vandalism at Regions Bank at approximately 3:56 a.m., a query of the HCSO's License Plate Reader system

revealed SALLAH's green Mercury Grand Marquis approximately one mile away from the victim ATM and traveling westbound at the corner of E. Bloomingdale Avenue and Bloomingdale Villas Ct at 3:35 a.m.

43. On February 18, 2020, Detectives with the PCSO) conducted surveillance on SALLAH at 2966 Drew Street, Apartment 935, Clearwater, Florida. At approximately 10:40 p.m., SALLAH was observed being picked up from the apartment by an unknown male driving a gray Dodge Charger bearing South Carolina tag PBN-570. The Dodge Charger was determined to be registered to Kirk Douglas JOHNSON. A positive ID on the driver was not made during the surveillance. At approximately 11:10 p.m., the Dodge Charger entered the shopping center at the northwest corner of Belcher Rd and Park Blvd where an Achieva Credit Union, Chase Bank, and Wells Fargo Bank are located. The Dodge Charger left the parking lot after a few moments. The Chase and Achieva banks each have free standing ATMs similar to those previously targeted.

44. At approximately 11:40 p.m., the Dodge Charger entered the parking lot of Grow Financial located at 6900 Park Blvd. The Dodge Charger slowly drove behind the building and then exited the parking lot. There are two free standing ATMs on the south side of the building. At approximately midnight, the Dodge Charger arrived at a residence in Tampa near 1007 N Paddock Ave. Both SALLAH and the unknown driver entered the residence for about 10 minutes and then left again in Dodge Charger.

45. At approximately 12:25 a.m., the Dodge Charger arrived at the Bank of America located at 2700 W Dr. MLK Jr. Blvd. in Tampa. The Dodge Charger circled the bank before departing the parking lot. There was a large, freestanding ATM at the south end of the property. At approximately 12:27 a.m., the Dodge Charger arrived at the BB&T located at 4144 N Armenia Ave. in Tampa. No ATM was visible at this location. At approximately 12:48 a.m., the Dodge Charger arrived at the Scarlet Strip Club located at 3819 E Seventh Ave., Tampa and both subjects went inside, remaining until the business closed at 2:00 a.m. At approximately 2:25 a.m., the Dodge Charger returned to the Wellington apartments and dropped SALLAH off at his apartment before departing. SALLAH entered 2966 Drew Street, Apartment 935, Clearwater, Florida.

46. At approximately 5:12 p.m. on February 22, 2020, PCSO surveillance units observed SALLAH drive his green Mercury Grand Marquis to the Home Depot located at 2495 Gulf to Bay Blvd in Clearwater, Florida where he purchased a number of items, after which he went to 2966 Drew Street, Apartment 935, Clearwater, Florida.

47. On February 24, 2020, ATF SA Deslauriers made contact with an asset protection officer at the Home Depot and learned that, on February 22, 2020, SALLAH utilized a debit card to purchase a pair of large blue & black Grease Monkey Gorilla gloves, painter's tape, sandpaper, and two cans of Rust-Oleum spray paint; one flat black "2X Ultracover paint and primer", the other clear gloss "2X Ultracover paint."

48. A Home Depot query of the debit card used by SALLAH showed one additional purchase at the store dated December 6, 2019, in which SALLAH purchased two pairs of gloves: an extra-large blue & black Grease Monkey Gorilla gloves and large orange & black "Firm Grip" work gloves.

49. Geo-location data reviewed on February 29, 2020, related to JOHNSON's phone revealed that, on February 29, 2020, the phone traveled southbound from South Carolina, eventually arriving in the vicinity of 2966 Drew Street, Apartment 935, Clearwater, Florida.

50. On February 29 through March 1, 2020, Pinellas County Detectives, assisted by aerial surveillance, conducted surveillance at 2966 Drew Street, Apartment 935, Clearwater, Florida. At approximately 11:34 p.m. on February 29, SALLAH and an individual identified as Kirk JOHNSON left the location in a green Volvo bearing South Carolina tag GFF-417. The Volvo arrived at the Scarlet Strip Club located at 3819 E. 7<sup>th</sup> Avenue in Tampa, Florida at approximately 12:11 a.m. on March 1, 2020. Both SALLAH and JOHNSON went inside, departing again in the Volvo at approximately 12:56 a.m. The Volvo traveled to the area of a Chase Bank located at 16534 N. Florida Avenue in Lutz, Florida, where it made multiple passes in front of the bank. The Chase Bank has a freestanding drive-up ATM behind the location. The Volvo returned to 2966 Drew Street, Apartment 935, Clearwater, Florida at approximately 2:02 a.m.

51. SALLAH and JOHNSON left 2966 Drew Street, Apartment 935, Clearwater, Florida again in the Volvo at approximately 2:40 a.m. Both were

dressed in dark clothing, including hooded sweatshirts, and carrying large backpacks. The Volvo traveled to the area of the Centennial Bank located at 4301 Barclay Avenue in Spring Hill, Florida, arriving around 4:14 a.m. The Centennial Bank has a freestanding ATM located behind the bank. After making several passes by the bank, the Volvo stopped on the side of the road a short distance from the bank. The passenger, previously identified as SALLAH, exited the Volvo, retrieved something from the trunk, and walked into the wooded area near the roadway. SALLAH made his way through the woods until he was behind the Centennial bank as the Volvo continued to circle the area. SALLAH approached the freestanding ATM twice before retreating into the woods and returning to the Volvo, which had pulled onto the side of the road nearby. From the coordination, it was apparent that SALLAH and JOHNSON were able to communicate while away from each other, either by phone or other means such as walky-talkies. The Volvo left the area at approximately 4:40 a.m. Surveillance units were unable to follow the Volvo.

52. The Volvo returned to 2966 Drew Street, Apartment 935, Clearwater, Florida at approximately 5:54 a.m. SALLAH and JOHNSON, dressed in dark clothing and hoodies and carrying backpacks, went into 2966 Drew Street, Apartment 935, Clearwater, Florida

53. JOHNSON left 2966 Drew Street, Apartment 935, Clearwater, Florida at approximately 9:29 a.m. He was wearing a dark shirt and camouflage pants and carrying a duffle bag, which he placed in the Volvo. JOHNSON left the location and traveled north on Interstate 75.

### PERTINENT PHONE GEO-LOCATION DATA

54. Real-time review of geo-location data for both SALLAH's phone and JOHNSON's phone during the surveillance revealed that both phones traveled from the vicinity of 2966 Drew Street, Apartment 935, Clearwater, Florida to the area of Scarlett's Strip Club and the Chase Bank located at 16534 N. Florida Avenue in Lutz, Florida. The phone geo-location data matched SALLAH's and JOHNSON's locations until they returned to 2966 Drew Street, Apartment 935, Clearwater, Florida at approximately 2:02 a.m. on March 1, 2020.

55. The geo-location data for both phones revealed that the phones remained in the area of 2966 Drew Street, Apartment 935, Clearwater, Florida after SALLAH and JOHNSON left in the Volvo at approximately 2:40 a.m., indicating both phones were left behind as they targeted the Centennial Bank located at 4301 Barclay Avenue in Spring Hill, Florida.

56. Geo-location data for JOHNSON's phone after JOHNSON left around 9:29 a.m. on March 1, 2020, revealed that the phone traveled northbound on I-75, consistent with JOHNSON's route returning to South Carolina.

57. Review of geo-location data for SALLAH's phone beginning at approximately 8:21 p.m. on March 19, 2020 revealed that the phone traveled from the vicinity of SALLAH's apartment to the vicinity of the Tampa International airport, shortly after which geo-location data was unattainable for approximately 1.5 hours. Once geo-location data resumed, it revealed the phone was now in the vicinity of the Hartsfield-Jackson Atlanta International Airport in Atlanta, Georgia.

58. Review of the geo-location data for JOHNSON's phone beginning at approximately 7:06 p.m. on March 19, 2020 revealed that the phone traveled from the vicinity of 1524 Mountain View Road, Anderson, South Carolina, to the vicinity of the Hartsfield-Jackson Atlanta International Airport in Atlanta, Georgia.

59. The geo-location data for both phones revealed the phones then traveled to the vicinity of 1524 Mountain View Road, Anderson, South Carolina, taking Interstate 85 to Jefferson Bypass through Jefferson, Georgia. From the direction of travel and locations of the phones, it was apparent the phones were traveling together, consistent with JOHNSON picking SALLAH up at the Hartsfield-Jackson Atlanta International Airport.

60. Review of the geo-location data for SALLAH's phone beginning at approximately 12:04 p.m. on March 20, 2020 revealed the phone traveled from the vicinity of 1524 Mountain View Road, Anderson, South Carolina to the vicinity of Jefferson, Georgia. The geo-location data revealed the phone traveled south on Jefferson Bypass to the area of three banks, including (1) Bank of the Ozarks located at 1465 Old Swimming Pool Road, Jefferson, Georgia, (2) Mountain Valley Community Bank located at 1420 Winder Highway, Jefferson, Georgia, and (3) Northeast Georgia Bank located at 1775 Old Pendergrass Road, Jefferson, Georgia. All three banks have freestanding ATM's consistent with those targeted in the past. The phone immediately left the vicinity of the banks and traveled back to the vicinity of 1524 Mountain View Road, Anderson, South Carolina.

61. Review of the geo-location data for SALLAH's phone at approximately 6:19 p.m. on March 20, 2020 revealed the phone to be in the vicinity of the Lowe's Home Improvement located at 408 Highway 28 Bypass in Anderson, South Carolina. Law enforcement made contact with a manager at the Lowe's and discovered that SALLAH had purchased clear vinyl tubing, razor blades, 25 feet of electric lamp cord, and duct tape. ATF Special Agent Bomb Technician (SABT) Nicolussi opined that these items could be used to transfer and ignite compressed gas.

62. On March 21, 2020, ATF Agents and local law enforcement conducted surveillance at 1524 Mountain View Road, Anderson, South Carolina. At approximately 12:02 a.m., a subject believed to be JOHNSON, dressed in all black, exited 1524 Mountain View Road, Anderson, South Carolina. He retrieved a backpack from the trunk of JOHNSON's Dodge Charger, after which he returned to the residence.

63. At approximately 12:15 a.m., two individuals dressed in black clothing exited 1524 Mountain View Road, Anderson, South Carolina and left in the Green Volvo bearing South Carolina tag GFF-417. One of the individuals was observed carrying a backpack.

64. Geo-location data for SALLAH's phone and JOHNSON's phone revealed the phones traveled with the Volvo throughout the night until returning to the vicinity of 1524 Mountain View Road, Anderson, South Carolina near dawn.

65. The Volvo traveled approximately one hour to Jefferson, Georgia, traveling southbound on Jefferson Bypass to the area of the three banks, (1) Bank of the Ozarks, (2) Mountain Valley Community Bank, and (3) Northeast Georgia Bank after which the Volvo continued south to Athens, Georgia.

66. Geo-location data for phone number SALLAH's phone revealed the phone to be in the vicinity of a Wells Fargo Bank located at 1059 Gaines School Road, Athens, Georgia at approximately 2:34 a.m. The Wells Fargo Bank has a freestanding ATM consistent with ATM's targeted in the past.

67. The Volvo then traveled back to the area of the three banks noted in paragraph 65.

68. The unpredictable turns made by the Volvo made it impossible for surveillance units to maintain visual of the vehicle throughout the surveillance, forcing Agents to rely heavily on phone geo-location data.

69. Geo-location data for both phones revealed that, after traveling in the vicinity of the three banks in Jefferson, Georgia a second time, the phones traveled approximately one hour south to Greensboro, Georgia. Geo-location data for SALLAH's phone at approximately 4:19 a.m. revealed the phone was in the vicinity of two banks with freestanding ATM's consistent with ATM's targeted in the past, (1) BankSouth bank located at 6340 Lake Oconee Parkway, Suite 101, Greensboro, Georgia and (2) BB&T located at 1011 Powers Road, Greensboro, Georgia.

70. Geo-location data for both phones revealed that the phones then left the vicinity of Greensboro, Georgia and traveled through country roads back to the vicinity of 1524 Mountain View Road, Anderson, South Carolina.

71. ATF, FBI, and local law enforcement conducted surveillance at 1524 Mountain View Road, Anderson, South Carolina the night of March 21, 2020. JOHNSON and SALLAH left the residence in the Volvo shortly after 12:00 a.m. on March 22, 2020. Surveillance was conducted using a combination of mobile, aerial, and stationary surveillance supplemented by geo-location data from SALLAH's phone and JOHNSON's phone.

72. The Volvo traveled through Jefferson, Georgia, passing the three banks discussed in paragraph 65. Geo-location data for SALLAH's phone revealed that the phone was traveling the same route as the Volvo, indicating SALLAH had his phone with him. Geo-location data for JOHNSON's phone revealed the phone remained in the vicinity of 1524 Mountain View Road, Anderson, South Carolina, indicating JOHNSON had left his phone at his residence.

73. Geo-location data for SALLAH's phone revealed the phone traveled to the vicinity of a Bank of the Ozarks located at 1252 Virgil Langford Rd, Watkinsville, Georgia. The geo-location data revealed the phone remained stationary in the vicinity of the bank from approximately 2:48 a.m. through approximately 3:06 a.m. Surveillance units drove past the Bank of the Ozarks shortly before 3:14 a.m. and observed that the ATM had sustained damage consistent with an explosion.

74. I later reviewed a short portion of video surveillance footage containing moments before and after the explosion of the Bank of the Ozarks ATM. The video showed two subjects dressed in hoodies move away from the ATM and hide behind a pillar directly next to the ATM, after which the ATM exploded. Both subjects immediately gathered what appeared to be a length of wiring and/or tubing into a bag, after which one subject started walking away as the other attempted to gain entry to the ATM. After a moment, both subjects left the area on foot after an unsuccessful attempt to breach the interior door of the ATM.

75. Geo-location data for SALLAH's phone immediately after the explosion revealed the phone had left the vicinity of the bank and was traveling northbound toward Interstate 85. Surveillance units located the Volvo traveling northbound on Jefferson Bypass near Interstate 85.

76. A traffic stop was conducted on the Volvo. JOHNSON and SALLAH were the sole occupants. A subsequent search of the Volvo produced a number of items, including a length of black wire with a match taped into one end, a large pry-bar, gloves, a tank of compressed gas, a nine-volt battery, clear plastic tubing, and a can of spray paint. A bag containing a length of wire and clear tubing consistent with what had been observed in the bank surveillance video was also located in the Volvo.

77. ATF Agents executed a search warrant at 2966 Drew Street, Apartment 935 in Clearwater Florida (SALLAH's residence) at 8:55 a.m. on March 22, 2020. A number of items were seized from the residence during the search, including the

following: one large pressurized oxygen tank, one LG cellphone, pressure gauges with tubing, one roll of copper wire, one small pressurized oxygen tank, a gray sweatshirt, one silver LG cellphone, gloves, batteries, electrical tape, air hoses, one crowbar, one GPS tracking device, one box of matches (250), and one can of blue spray paint. These items were consistent with items found in the Volvo.

78. ATF Agents also executed a search warrant on SALLAH's Mercury Grand Marquis on March 22, 2020. The search produced a role of shop rags, five red plastic paint straws, one spray-paint can attachment, and one pair of blue and gray RBX shoes. The shoes and red straws were consistent with items used during previous ATM explosions in the Middle District of Florida.

**CONCLUSION**

79. Based on the foregoing information, there is probable cause to believe that SALLAH and JOHNSON committed the offense of conspiracy to commit arson in violation of 18 U.S.C. § 844(n).

  
Yannick Deslauriers  
Special Agent, ATF

Subscribed and sworn to me  
on March 22, 2020.

  
JULIE S. SNEED  
United States Magistrate Judge

# UNITED STATES DISTRICT COURT

for the  
Middle District of Florida

United States of America  
v.  
MAWDO MALICK SALLAH and  
KIRK DOUGLAS JOHNSON

Case No.

**8:20MJ1321JSS**

Defendant

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) KIRK DOUGLAS JOHNSON

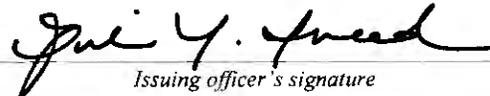
who is accused of an offense or violation based on the following document filed with the court:

- Indictment       Superseding Indictment       Information       Superseding Information       Complaint
- Probation Violation Petition       Supervised Release Violation Petition       Violation Notice       Order of the Court

This offense is briefly described as follows:

See attached affidavit

Date: 03/22/2020



Issuing officer's signature

City and state: Tampa, Florida

**JULIE S. SNEED, U.S. MAGISTRATE JUDGE**

Printed name and title

### Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.**

*(Not for Public Disclosure)*

Name of defendant/offender: \_\_\_\_\_

Known aliases: \_\_\_\_\_

Last known residence: \_\_\_\_\_

Prior addresses to which defendant/offender may still have ties: \_\_\_\_\_

Last known employment: \_\_\_\_\_

Last known telephone numbers: \_\_\_\_\_

Place of birth: \_\_\_\_\_

Date of birth: \_\_\_\_\_

Social Security number: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_

Sex: \_\_\_\_\_ Race: \_\_\_\_\_

Hair: \_\_\_\_\_ Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks: \_\_\_\_\_

History of violence, weapons, drug use: \_\_\_\_\_

Known family, friends, and other associates *(name, relation, address, phone number)*: \_\_\_\_\_

FBI number: \_\_\_\_\_

Complete description of auto: \_\_\_\_\_

Investigative agency and address: \_\_\_\_\_

Name and telephone numbers (office and cell) of pretrial services or probation officer *(if applicable)*: \_\_\_\_\_

Date of last contact with pretrial services or probation officer *(if applicable)*: \_\_\_\_\_



**This second page contains personal identifiers provided for law-enforcement use only and therefore should not be filed in court with the executed warrant unless under seal.**

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Place of birth: \_\_\_\_\_

Date of birth: \_\_\_\_\_

Social Security number: \_\_\_\_\_

Height: \_\_\_\_\_ Weight: \_\_\_\_\_

Sex: \_\_\_\_\_ Race: \_\_\_\_\_

Hair: \_\_\_\_\_ Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks: \_\_\_\_\_

History of violence, weapons, drug use: \_\_\_\_\_

Known family, friends, and other associates *(name, relation, address, phone number)*: \_\_\_\_\_

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