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AFFIDAVIT

I, Lawrence P. Borghini, having been duly sworn, state the following:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been employed as such since 1996. In my present position as a Special Agent with the FBI, I have participated in and directed numerous criminal investigations and obtained and executed search warrants for evidence relating to criminal violations of Title 18, United State Code. I have also participated in and directed criminal investigations, which have resulted in prosecutions for criminal violations of Title 18, United States Code, including criminal activity involving terrorism, public corruption, fraud, and violent crime. This affidavit is submitted in support of the Government's application for arrest warrants for Michael Bernard Gilmore, date of birth _____, social security number _____, and Larry Bernard Gilmore, date of birth _____, social security number _____

pursuant to Title 18, United States Code, Section 1951, Conspiracy to Interfere with Commerce by Threats or Violence.

2. I have not included each and every fact known about the investigation described herein; rather, I have included only those facts I believe are necessary to demonstrate probable cause for the arrest warrants sought. The information in this affidavit is based upon my personal knowledge and observations, on information

conveyed to me by other law enforcement officials and witnesses, and on my review of records.

3. An ongoing investigation by the FBI and other investigative agencies has revealed that Michael Bernard Gilmore, Larry Bernard Gilmore, Abigail Lee Kemp, Lewis Jones, III, and others currently unknown have been involved in a conspiracy to interfere with commerce by threats or violence. More specifically, Michael Bernard Gilmore, Larry Bernard Gilmore, Abigail Lee Kemp, Lewis Jones, III, and others currently unknown have conspired, confederated, and agreed to commit armed robberies of various jewelry stores throughout the southeast United States. The details of the investigation are set forth below:

FACTUAL SUMMARY

A. Panama City Beach Robbery of Reed's Jewelry:

4. On August 11, 2015, at approximately 10:10 AM CST, Abigail Lee Kemp ("Kemp") entered Reeds Jewelers located at 15601 Starfish Street #110, Panama City Beach, Florida, and displayed a handgun (with a black frame and silver slide) to store employees. At gunpoint, Kemp ordered the two store employees to the store's restroom, made them lay face down on the floor, and zip tied the employees' hands. A black male, later identified as Lewis Jones, III ("Jones"), was seen on surveillance video removing the front door stop and letting the front door of the business close while he remained outside of the store. After

locking the front door, Kemp proceeded to remove approximately \$348,940 worth of jewelry from the store's display cases and place the various pieces of jewelry in a bag. The surveillance video shows that Kemp was the only person in the store other than the store employees during the robbery. During the robbery, Kemp used her cellular telephone with an earpiece to communicate with Jones. Jones, Michael Bernard Gilmore ("Michael"), and Larry Bernard Gilmore ("Larry") were outside the Reeds Jewelers store providing surveillance and security for Kemp while she was inside robbing the store. After leaving the jewelry store, Kemp was picked up by Jones who was driving Kemp's maroon Honda Civic. Kemp placed the jewelry, the handgun, and her clothes into a trash bag and gave the bag to Jones. Kemp and Jones then drove a short distance before meeting up with Michael and Larry. Jones was in telephonic contact with Michael and Larry both prior to Kemp entering the jewelry store and after Jones picked her up following the robbery. During these communications, Jones, Michael, and Larry coordinated the robbery and their departure route from the area. Upon meeting up with Larry and Michael, Jones took the trash bag filled with the jewelry, handgun, and Kemp's clothes and departed with them in the vehicle that they were driving. Kemp then departed Panama City Beach, Florida, in her maroon Honda Civic and drove back to her residence in the Atlanta, Georgia, area.

5. Surveillance video from Reeds Jewelers on August 10, 2015, shows Kemp in the jewelry store asking about various items. At that time, she had a cellular telephone in her possession and was wearing an earpiece. A search of social media revealed a photograph taken by Kemp of Jones, Michael, and Larry on Panama City Beach during August 2015. A canvass of the hotels in the area revealed two rooms were rented by Michael at the Ocean Breeze Hotel in Panama City Beach, Florida, on the evening of August 10, 2015.

B. Other Robberies:

6. On or about April 28, 2015, at approximately 10:10 AM EST, Kemp and Jones entered the Jared Vault located at 915 Ridgewalk Parkway, Suite 500, Woodstock, Georgia. Jones displayed a handgun (with a black frame and silver slide) and had Kemp lay down on the floor of the store. Jones then ordered the store employees to the back of the store, had them lay face down on the floor, and zip tied their hands. While inside the store, Kemp acted as a look out while Jones removed \$857,485 worth of merchandise from the display cases and placed it in a bag. During the robbery, Michael and Larry provided surveillance and security outside the jewelry store for Kemp and Jones. This robbery predated the Panama City Beach robbery of Reeds Jewelers by approximately three and a half months.

7. On or about August 5, 2015, at approximately 10:20 AM EST, Kemp entered the Zales Outlet located at 800 GA-400 #960, Dawsonville, Georgia, and

displayed a handgun (with a black frame and silver slide). She ordered the store employees to the back of the store, had them lay face down, and zip tied their hands. Kemp began removing approximately \$13,254 worth of jewelry from the store's display cases, but left when a customer entered the jewelry store. Jones, Michael, and Larry were outside the jewelry store providing surveillance and security for Kemp during the robbery. This robbery predated the Panama City Beach robbery of Reeds Jewelers by approximately one week.

8. On or about September 2, 2015, at approximately 10:15 AM EST, Kemp entered the Jared Vault located at 1414 Fording Island Road, Bluffton, South Carolina, and displayed a handgun (with a black frame and silver slide). Kemp ordered the store employees to a back room in the store, forced them to lay face down, and zip tied their hands. During the South Carolina robbery, Kemp can be seen on the surveillance video using a cellular telephone earpiece similar to the earpiece she used during the Panama City Beach robbery of Reeds Jewelers. Kemp stole \$927,439 worth of jewelry before leaving the store. Similar to the robberies discussed above, Jones, Michael, and Larry remained outside the jewelry store providing surveillance and security for Kemp during the robbery. This robbery occurred approximately one month after the Panama City Beach robbery.

9. On or about October 16, 2015, at approximately 9:32 AM EST, Kemp entered the Jared Vault jewelry store located at the Tanger Outlet at Five Oaks,

1645 Parkway, Sevierville, Tennessee. After entering the store, Kemp walked to the register area located at the back of the store, removed a black handgun from her purse, and escorted two employees to a back room where they were forced to lay face down on the floor while Kemp zip-tied their hands behind their backs. Kemp returned to the showroom, locked the front door, and proceeded to steal approximately \$893,550 worth of jewelry. Again, Jones, Michael, and Larry remained outside the jewelry store providing surveillance and security for Kemp. This robbery occurred approximately two months after the Panama City Beach robbery.

10. On or about December 30, 2015, Kemp entered the Reeds Jewelers at The Shoppes at River Crossing located at 5080 Riverside Drive, Suite 112, Macon, Georgia, shortly after the store opened in the morning. The store manager believed Kemp matched the description and appearance of the white female who previously was linked to the armed robberies of various jewelry stores located in Florida, Georgia, South Carolina, and Tennessee. The store manager requested that a second store employee contact law enforcement while the store manager assisted Kemp. At that time, a UPS driver entered the store to make his morning delivery. Jones, Michael, and Larry were outside the jewelry store providing surveillance and security for Kemp. As in the previous jewelry store robberies, Kemp was in telephonic contact with Jones during the robberies. During their telephonic

communications, Jones directed Kemp to leave the store after he witnessed and advised Kemp that an employee had exited the store. Kemp did not rob the Reeds Jewelers located at The Shoppes at River Crossing. This incident occurred approximately 5 months after the Panama City Beach robbery of Reeds Jewelers.

11. On or about January 4, 2016, at approximately 10:36 AM EST, Kemp entered the Jared Vault located at 4000 Arrowhead Boulevard, Suite 736, Mebane, North Carolina. A short time later, Kemp displayed a black handgun and ordered the employees into a back room and zip-tied both employees. Kemp returned to the showroom and proceeded to steal approximately \$938,353 worth of jewelry. Again, Jones, Michael, and Larry were outside the jewelry store providing surveillance and security for Kemp. This robbery occurred approximately five months after the Panama City Beach robbery.

12. All of the above-described robberies had the same modus operandi and are connected. During all of the robberies except for the April 2015 robbery when Jones and Kemp both entered the jewelry store, Kemp would enter an Outlet Mall jewelry store at approximately the same time of day, brandish a firearm, order the employees to the back of the store, and force them to lay face down while she zip tied their hands behind their backs. Furthermore, Kemp would use a cellular telephone with an earpiece to communicate with Jones while Jones, Michael, and Larry conducted surveillance in the area outside the jewelry stores.

C. Arrest of Abigail Lee Kemp and Lewis Jones, III:

13. Based upon the armed robberies discussed above, Kemp was charged in the Northern District of Florida with conspiracy to interfere with commerce through threats or violence and arrested pursuant to an arrest warrant on or about January 8, 2016. At the time of her arrest, Kemp was in the company of Jones who was arrested on a Georgia state warrant for bank robbery. At the time of their arrests, law enforcement recovered two (2) semi-automatic pistols, which are believed to be the same firearms used in the robberies discussed above.

D. Ongoing Investigation:

14. As set forth below, since the arrests of Kemp and Jones, further investigation has revealed that Michael and Larry were intricately involved in the planning and commission of the six armed robberies discussed above.

15. In April 2015, while en route to the Jared Vault in Woodstock, Georgia, Jones explained a plan to rob the Jared Vault jewelry store to Kemp: Kemp was to go inside the store first and engage the staff, after which Jones would enter the store and rob it. Michael and Larry Gilmore would remain in the area outside Jared Vault and provide surveillance and security during the robbery.

16. After the April 28, 2015, robbery of the Jared Vault jewelry store, Michael, Larry, and Jones began training Kemp to rob the jewelry stores on her own while Jones, Michael, and Larry acted as her lookouts outside the stores. This

training took place at the Gilmore's window tint shop, Buckhead Window Tinting, located at 2179 Cheshire Bridge Road NE, Atlanta, Georgia. Michael, Larry, and Jones reviewed layouts of the target jewelry stores with Kemp; instructed her on the proper way to manipulate a handgun, how to secure the employees with zip ties, and what merchandise to steal from the store; and gave Kemp various code words to use when communicating during the jewelry store robberies. Furthermore, they decided what clothes/disguises Kemp would wear during the robberies and then purchased the items for her. They also supplied everything needed for the robberies such as zip ties, latex gloves, and bags to put the jewelry in. Jones would prepare the bag that Kemp carried during the robberies by placing zip ties, a bag, and the handgun in it. They routinely practiced at Buckhead Window Tinting until they believed Kemp was ready to commit the robberies.

17. Michael, Larry, and Jones always selected the dates and locations of the jewelry stores to be robbed. The robberies always included the use of two vehicles. Kemp and Jones would travel in one vehicle while Michael and Larry traveled in the second vehicle. Following the robbery of the jewelry store, Jones would pick up Kemp, and she would place the stolen jewelry, handgun, and her clothes into a trash bag, which she would then give to Jones. Kemp and Jones would then drive a short distance to meet up with Michael and Larry. Upon meeting up with Larry and Michael, Jones would take the trash bag filled with the

jewelry, handgun, and Kemp's clothes, and depart with them. Kemp would travel back to Atlanta, Georgia, by herself. Generally, a few days after the robberies had occurred, Kemp would meet Jones, and on at least one occasion, Larry, to receive payment for her share of the robbery proceeds, usually with \$100 dollar bills.

18. Furthermore, on January 8, 2016, Jones drove to Kemp's apartment in a black minivan, which previously had been rented by Michael from Advantage Rent-A-Car. A search of the minivan produced a North Carolina Walmart receipt for the purchase of the ski band and gloves that Kemp wore during the Mebane, North Carolina, jewelry store robbery; a box of latex gloves; a sweatshirt with the logo for Buckhead Window Tinting (Larry's and Michael's window tinting shop); a credit card in the name of Michael Gilmore; a rental agreement in the name of Michael Gilmore; and medical paperwork relating to Michael Gilmore. Surveillance video from the Walmart in Salisbury, North Carolina, on January 4, 2016, shows Larry purchasing the ski band and gloves with cash and then departing the store parking lot in a black minivan.


E. Cellular Telephone Analysis:

19. An analysis of cellular data reveals that Michael's and Larry's cellular telephone devices were at or near the jewelry store locations in Woodstock and Dawsonville, Georgia, Panama City Beach, Florida, Bluffton, South Carolina, Sevierville, Tennessee, and Mebane, North Carolina, at or around the time of the

jewelry store robberies. The cellular data further reveals that Jones' telephone number was in contact with Michael's and/or Larry's telephone numbers just prior to and just after the jewelry store robberies at the locations mentioned above. During the time Kemp was committing the jewelry store robberies, Jones's telephone number was in contact with Kemp's telephone number.


CONCLUSION

20. Based upon the aforementioned, your affiant believes there is probable cause to believe that Michael Bernard Gilmore and Larry Bernard Gilmore, unlawfully combined, conspired, and confederated with Abigail Lee Kemp, Lewis Jones, III, and others unknown to interfere with commerce by threats or violence in violation of Title 18, United States Code, Section 1951.



Lawrence P. Borghini
Special Agent
Federal Bureau of Investigation

Subscribed to and sworn before me on this 11th day of February, 2016.



Larry A. Bodiford
United States Magistrate Judge