

**FILED****12/6/2023**THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

BRIAN SNYDER

CASE NUMBER: 1:23-cr-00619

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

*Code Section*Title 18, United States Code, Section  
1951(c)*Offense Description*

Beginning on or about February 5, 2023, and continuing until December 5, 2023, SNYDER conspired with other individuals to obstruct, delay, and affect interstate commerce, and the movement of articles and commodities in commerce, by robbery, as "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b)

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

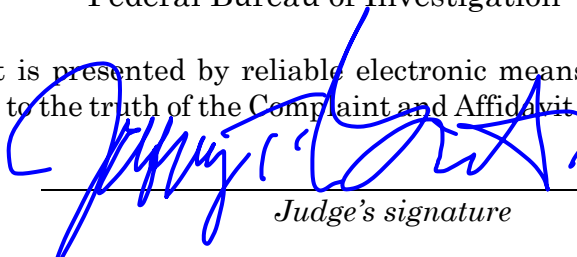
Daniel Broeckelmann

DANIEL BROECKELMANN

Special Agent,

Federal Bureau of Investigation

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: December 6, 2023City and state: Chicago, Illinois*Judge's signature*JEFFREY T. GILBERT, U.S. Magistrate Judge*Printed name and title*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**AFFIDAVIT**

I, DANIEL BROECKELMANN, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation. I have been so employed since approximately June of 2021. As part of my duties as an FBI Special Agent, I investigate criminal violations relating to violent crimes, including, among others, kidnapping, bank robbery, and the apprehension of violent fugitives. In addition, I currently serve in the violent crimes task force based out of South Resident Agency of the Chicago Field Office of the FBI.

2. This affidavit is submitted in support of a criminal complaint charging BRIAN SNYDER ("SNYDER") with conspiring with other individuals to obstruct, delay, and affect interstate commerce, and the movement of articles and commodities in commerce, by robbery, as "commerce" and "robbery" are defined in Title 18, United States Code, Section 1951(b).

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint against BRIAN SNYDER, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

4. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents and officers, information received from other witnesses, review of photographs and videos, review of public records databases, my training and experience, and the training and experience of other law enforcement agents.

## **I. FACTS SUPPORTING PROBABLE CAUSE**

5. Since approximately October 2022, FBI has been investigating a series of armed robberies of armored trucks and ATMs in Chicago's south suburbs, in which the robbers target an ATM technician or armored truck employee. These robberies include a robbery on February 5, 2023, and a recent series of six robberies between August 16, 2023, and November 17, 2023.

6. Each robbery followed a similar *modus operandi*: between 2-5 young black males armed with semi-automatic handguns used, in most robberies, a stolen Infiniti sedan, a stolen Infiniti SUV, or stolen Nissan, with stolen plates, to steal cash from an ATM or armored truck. The stolen vehicles have been abandoned and recovered in multiple of the robberies to date. In each of those instances, law enforcement determined that the vehicle was stolen using a key reprogrammer.<sup>1</sup>

7. As discussed in more detail below, based on cellular telephone location information, text messages, and robbery tools recovered from SNYDER's residence,

---

<sup>1</sup> Based on my training and experience, I am aware that a key reprogrammer is a device that can be purchased online, and that plugs into the OBD sensor port in a vehicle. When the key reprogrammer is connected to the Internet, different codes can be obtained to help reprogram the car's keys and can allow for a new key or dummy key to act as the primary key for that vehicle.

SNYDER participated in a conspiracy with other individuals to rob armored cars and ATMs between February 5, 2023 and December 5, 2023.

8. Beginning no later than June 2023, and continuing until December 5, 2023, SNYDER used a telephone answering to 708-295-0406 (SNYDER Phone) based on the following information:

a. During a post-*Miranda* interview on December 5, 2023, SNYDER stated that 708-295-0406 (**SNYDER's Phone**) was his phone number. SNYDER also identified 9251 S. Indiana Avenue in Chicago as his residence (**SNYDER's Residence**).

b. I have reviewed recorded calls made from various county jails to **SNYDER's Phone** by multiple inmates, including at least one inmate charged in an armored truck robbery that is a part of the conspiracy to rob armored cars, between June 2023 and October 19, 2023. Based on my personal encounters with SNYDER, I recognize SNYDER's voice as the voice of the user of **SNYDER's Phone** in these calls.

c. On December 5, 2023, Individual A, who was present at the residence at which SNYDER was located, told agents that he/she witnessed SNYDER attempt to destroy **SNYDER's Phone** after SNYDER learned that FBI agents were at the residence.

**A. February 5, 2023, Robbery of an Armored Truck Driver in Country Club Hills, Illinois**

9. On or about February 5, 2023, at approximately 4:01 p.m., at least four armed young black males, who were wearing gloves, robbed an armored truck driver

at a Bank of America ATM, located at 4211 167th Street, Country Club Hills, Illinois. The robbers then fled in a vehicle heading westbound.

10. At the time of the robbery, a nearby officer observed a black Infiniti Q50 coming from the direction of the Bank of America ATM and fleeing westbound on 173rd Street across Cicero Avenue at a high rate of speed. The officer began following the Infiniti but eventually lost sight of it. Through license plate readers, law enforcement was able to determine the license plate of Infiniti as Illinois plate CR27821.

11. On February 6, 2023, at approximately 3:18 a.m., law enforcement officials were able to locate the Infiniti bearing Illinois plate CR27821 on the 12000 block of S. Emerald in Chicago after a resident called to report the vehicle. Law enforcement made contact with the registered owner of the Infiniti, who stated that her car was stolen on or about January 31, 2023. The owner provided consent to search vehicle. During the search of the Infiniti, law enforcement recovered a glove from in between the driver's seat and the center console. The glove was submitted to the FBI Laboratory for testing.

12. According to FBI Laboratory reports, in summary, DNA was obtained from the glove and entered into the FBI's Combined DNA Index System (CODIS), which I know from my training and experience is a database software program which contains DNA profiles from previously convicted felons and others. Once forensic samples are submitted, CODIS compares the samples against offender DNA profiles (Indexing Specimen) to identify possible matches. In this case, the FBI laboratory

reported that the DNA from the glove had a possible association to a CODIS profile for BRIAN SNYDER with a DOB: December 4, 1999, with SID #: 24025841.

13. According to law enforcement databases, SNYDER has the same date of birth and state identification number (SID) as the Brian Snyder referenced above in connection with the DNA CODIS hit from the February 5, 2023 robbery. Based on my training and experience, I know that Illinois assigns an SID number to individuals after the individuals' fingerprints are entered into a database maintained by the Illinois State Police.

**B. August 16, 2023 Robbery of the Chase Bank ATM in Lansing, Illinois**

14. According to police reports, surveillance, and victim interviews, on August 16, 2023, three black males armed with firearms robbed a Brink's driver while the driver was in the process of servicing the Chase Bank ATM located at 16767 Torrence Avenue, Lansing, Illinois at approximately 10:47 a.m. The robbers took cash from the open ATM and a bag of cash from the Brink's driver. The three robbers attempted to gain access into the armored truck by taking the driver at gun point to the truck, but they were not able to get into the truck and did not get any cash from inside the truck.

15. Surveillance footage shows the robbers fleeing in a dark colored Nissan four-door sedan, license plate number unknown. Brink's records showed that the robbers stole approximately \$74,766.

**C. August 23, 2023 Robbery of the US Bank ATM in Blue Island, Illinois**

16. According to police reports, surveillance, and victim interviews, on August 23, 2023, three black males armed with firearms robbed an ATM engineer who was in the process of servicing the US Bank ATM located at 11960 Western Ave., Blue Island, Illinois at approximately 2:33 p.m. The robbers approached the engineer displaying handguns and forced the engineer to open the safe on the ATM. The robbers took ATM cassettes containing approximately \$109,010. Photographs show the robbers arriving and fleeing in a black Infiniti Q50 bearing license plate ED 34866. The license plate was originally associated with a Mazda that was reported stolen on August 20, 2023.

17. Cellular telephone location information shows that on August 21, 2023, two days before the August 23 robbery, **SNYDER's Phone** utilized a cell tower servicing the intersection of 173<sup>rd</sup> Street and Torrence in Lansing, Illinois at 4:58 p.m. The Infiniti used in the August 23 robbery was observed on an LPR camera at that location at approximately 4:57 p.m.

18. Cellular telephone location information also shows that a telephone using number 310-849-0927 utilized a cell tower servicing the scene of the August 23, 2023, robbery one minute before the robbery. According to IDOC records, Subject C used the 0927 number ("Subject C Account 1) consistently to contact his parole officer from about August 12, 2023 until about September 18, 2023.

19. Telephone records show that Subject C Account 1 was in contact with **SNYDER's Phone** about three times on August 23 before the robbery.

20. During a parole check and subsequent search pursuant to a search warrant of Subject C's residence, law enforcement recovered clothing in Subject C's room matching the clothing worn by robbers in the August 23, 2023 robbery. Specifically, law enforcement recovered a sweatshirt with the tag "RAW" and black Nike sweatpants that both match those worn by robbers in the August 23, 2023 robbery in Blue Island.

21. During the search of Subject C's residence, law enforcement also recovered a black Glock with a silver switch that is similar in appearance to a gun used in the August 23 robbery. Below, a photograph of the recovered Glock is on the left, and a photo of one of the guns used in the August 23 robbery is on the right:



**D. September 5, 2023 Robbery of the BMO Harris ATM in Homewood, Illinois**

22. According to police reports, surveillance, and victim interviews, on or about September 5, 2023, three black males wearing black masks and dark hooded sweatshirts carrying automatic pistols with extended magazines approached a Garda employee outside an armored truck while the employee was servicing an ATM at the



BMO Harris Bank, located at 17600 Halsted Street in Homewood, Illinois, at approximately 12:46 p.m. The robbers pointed firearms at the employee and were able to steal \$46,140 from the open ATM. They also stole a firearm from one of the Garda drivers. The robbers fled in a stolen Nissan sedan bearing license plate number # ETF1481.

**E. September 19, 2023 Robbery of the Loomis Armored Truck in Chicago Heights, Illinois**

23. According to police reports, surveillance, and victim interviews, on September 19, 2023, three black males armed with firearms robbed a Loomis messenger and Loomis armored truck driver while they were in the process of servicing the Food4less Grocery Store located at 1333 Western Avenue in Chicago Heights, Illinois at approximately 1:30 p.m.

24. As shown on surveillance, a black Nissan four-door sedan (the “Nissan”) pulled up behind the Loomis armored truck. Three men exited the Nissan and pointed guns at the Loomis messenger, who was outside of the Loomis armored truck, and took his duty firearm. They also struck the messenger in the head while attempting to gain access inside the back of the armored truck. The robbers appeared to be wearing gloves.

25. As shown on surveillance, as one of the robbers attempted to climb into the rear of the Loomis armored truck, the Loomis driver, who was still in the driver’s seat, drove off into the parking lot. The robbers then began picking up cash from the ground and placing it inside the Nissan. The Loomis driver then drove the armored truck into the Nissan and damaged the rear passenger side of the vehicle before the

robbers drove off in the damaged Nissan. The robbers escaped with approximately \$913.25, \$813.25 of which was composed of rolls of quarters.

26. On or about September 20, 2023, the day after the robbery, law enforcement recovered the damaged Nissan in the area of 122<sup>nd</sup> and Yale, in the West Pullman neighborhood of Chicago.

27. The driver of the Nissan was wearing a black ski mask, white gloves, a black puffy jacket, dark jeans, and white shoes.

28. During the parole check and subsequent search of Subject C's residence on September 21, 2023, agents recovered a mask, gloves, jacket, jeans, and shoes that appear to match the clothing worn by this suspect. During the parole check, Subject C produced from his pocket keys to a Dodge Durango that was parked near his residence. IDOC officers searched the Durango and recovered packaging from a roll of quarters that was consistent with the rolls of quarters stolen by the robbers in the September 19 robbery.

29. During the parole check, IDOC officers recovered a phone from Subject C's bed and Subject C identified the phone as his own. Based on subpoenaed records and law enforcement's examination of the phone, that phone is associated with the phone number 310-614-6978 (Subject C Account 2).

30. Based on historical cell site location information, on September 19, 2023, the phone associated with Subject C Account 2 used cell towers servicing the location of the September 19, 2023 robbery in Chicago Heights at the approximate time of the robbery.

31. Based on historical cell site location information, on September 19, 2023, **SNYDER's Phone** utilized the following cell towers at the following approximate times, among others:

- 10:45 a.m. – Utilized cell towers servicing **SNYDER's Residence**
- 1:16-17 p.m. – Utilized cell towers servicing 1333 Western Avenue in Chicago Heights (the scene of the robbery at the time of the robbery)
- 1:30-2:00 – Utilized cell towers servicing about 122<sup>nd</sup> and Yale (the approximate location the vehicle used in the robbery was dumped)
- 6:21 p.m. – 8:28 p.m. – Utilized cell towers servicing **SNYDER's Residence**
- 8:59 p.m. – 10:06 p.m. – Utilized cell towers servicing **SNYDER's Residence**
- 11:23 p.m. – 10:15 a.m. on September 20 – Utilized cell towers servicing **SNYDER's Residence**

32. Based on telephone records, Subject C Account 2 was in contact with **SNYDER's Phone** about 31 times on the day of the September 19, 2023 robbery, including multiple times before and after the robbery.

**F. October 2, 2023 Attempted Robbery of Loomis Armored Truck in Country Club Hills, Illinois**

33. According to police reports, surveillance, and victim interviews, on October 2, 2023, three unknown black male subjects armed with firearms attempted to rob Loomis employees while they were servicing a Walmart located at approximately 4005 W 167<sup>th</sup> Street in Country Club Hills, Illinois at approximately 10:20 a.m.

34. The robbers arrived in a silver Nissan Maxima with no license plates on the exterior of the car. A robber exited the Nissan from the passenger door and almost immediately fired his firearm multiple times in the direction of the Loomis armored truck and the Loomis messenger, who was near the rear of the armored truck. The

robbers then re-entered the Nissan and attempted to flee. The driver of the Loomis armored truck drove the armored truck into the Nissan, damaging the vehicle. A robber in the rear driver side seat fired additional shots at the armored truck.

35. The robbers then abandoned the Nissan in the Walmart parking lot. All three robbers then fled the Nissan on foot through the driver side of the vehicle and ran up to a red Chevy Impala bearing license plate # GA68VN that was parked in the Walmart parking lot. They forced the occupant out of the Impala at gunpoint, entered the Impala, and fled the area in the Impala.

36. Law enforcement recovered the Impala at approximately 125<sup>th</sup> and Yale in the West Pullman neighborhood of Chicago, which is the same area in which the Nissan used in the September 19, 2023 robbery was found.

37. Based on cell site location information obtained for **SNYDER’S Phone**, on October 2, 2023, **SNYDER’s Phone** utilized the following cell towers at the following approximate times:

- 9:51 a.m. – 10:00 a.m. – Utilized cell tower(s) servicing **SNYDER’s Residence**.
- 10:24 a.m. – 10:43 a.m. – Utilized cell tower(s) servicing 125<sup>th</sup> and Yale in Chicago (location where the vehicle was recovered)
- 9:39 p.m. – 9:43 p.m. – Utilized cell tower(s) servicing **SNYDER’s Residence**

**G. November 17, 2023 Robbery of Loomis Armored Truck in Country Club Hills, Illinois**

38. On November 17, 2023, according to police reports, interviews, and surveillance video, at about 3:33 p.m., a stolen gray Infiniti Q50 sedan, bearing paper dealer advertisement plate reading, “CARMAX,” pulled alongside a Brink’s armored

truck that was parked near a McDonald's located at 11920 S Western Avenue in Blue Island, Illinois. According to surveillance and interviews with the victim, as the Brink's messenger was approaching the passenger side of the truck, three armed black males exited the Infiniti sedan and held the messenger at gunpoint. The robbers took the Brink's driver's gun and a bag containing approximately \$13,000 in cash. The three robbers got back into the Infiniti and left the area at a high rate of speed.

39. Law enforcement reviewed license plate reader (LPR) records for the Brink's truck that was robbed in the hours before the truck was robbed. Using information regarding the truck's location, law enforcement reviewed LPR and traffic cameras for areas in which the truck was located; through that review, law enforcement identified an Infiniti with a "CARMAX" license plate that appears to match the appearance of the Infiniti used in the robbery. According to the LPR records, what appears to be the same Infiniti was captured at multiple locations in the hours before the robbery on November 17 near the scene of the robbery and at locations along the approximate route of the armored truck that was robbed.

40. On December 5, 2023, Individual A gave law enforcement consent to search of Individual A's telephone. That search revealed several text messages with **SNYDER's Phone**, and Individual A confirmed that Individual A communicated with SNYDER by texting and calling **SNYDER's Phone**.

41. In particular, law enforcement found text messages to Individual A from SNYDER, using the SNYDER Phone, dated November 17, 2023, the date of the robbery in Blue Island, Illinois. As discussed above, the robbery occurred at about

3:33 p.m. The text messages on Individual A's phone show that at about 4:07 p.m., SNYDER texted Individual A, "Come get me" and "Hurry up." SNYDER provided a location at or about 17602 Walter Street in Lansing, Illinois. According to Google Maps, the Walter Street location is about a 20-minute drive from the scene of the robbery and about a 10-minute drive from where the Infiniti used in the November 17 robbery was towed by a tow truck on or about November 19, 2023. Individual A stated that Individual A picked SNYDER up at the Walter Street location in Lansing on November 17, 2023, at SNYDER's request.

#### **H. Robbery Tools Found at SNYDER's Residence**

42. On November 30, 2023, Magistrate Judge Kim issued a federal warrant to search **SNYDER's Residence**. According to cell site location information for **SNYDER's Phone** and surveillance, SNYDER was at **SNYDER's Residence** as recently as December 4, 2023.

43. Law enforcement executed the search warrant on December 5, 2023. During the execution of the warrant at **SNYDER's Residence**, law enforcement recovered from a bedroom a transcript of a court hearing in which SNYDER was a defendant, as well as a letter from Schneider Trucking addressed to SNYDER. Agents also found documents bearing the name of Individual ID, who is related to Brian Snyder and shares the bedroom with Snyder. In that same bedroom, agents found one latex glove behind the TV, and another latex glove on the TV stand itself. Agents found an extended firearm magazine, ammunition in a bag in the closet, and six cellular telephones. Law enforcement also found four key fobs in the bedroom, at least

one of which appears consistent with the type of fobs that can be used to start the Nissan and Infiniti vehicles that are used in these robberies.

44. Below are pictures of the blue latex glove found in SNYDER's room, which, as pictured below, appears consistent with the appearance of the gloves worn during the August 23 robbery.



45. Below are pictures of a black latex glove found in SNYDER's room, which, as pictured below, appears to match the gloves worn in during the August 16 robbery.



46. In the common area of the basement, two firearms were recovered, and in the storage room of the residence, an additional two firearms were recovered, including one that matches the appearance of a firearm used by the robbers.

47. Cellular location information showed that on multiple nights between November 30, 2023 and December 5, 2023, **SNYDER's Phone** often stopped moving overnight at a residence in Chicago ("**Residence A**").

48. On December 5, 2023, law enforcement attempted to execute a federal search warrant for **SNYDER's Phone** as he exited **Residence A**. When SNYDER learned of law enforcement's presence, he initially refused to exit **Residence A**. Individual A was also in **Residence A**, along with other individuals. According to Individual A, after SNYDER learned law enforcement was present outside the residence, he immediately attempted to destroy **SNYDER's Phone**.



## II. CONCLUSION

49. Based on the above, I submit that there is probable cause to believe that that beginning on or about February 5, 2023, and continuing until on or about December 5, 2023, SNYDER conspired with others to obstruct, delay, and affect interstate commerce, and the movement of articles and commodities in commerce, by robbery, as “commerce” and “robbery” are defined in Title 18, United States Code, Section 1951(b).

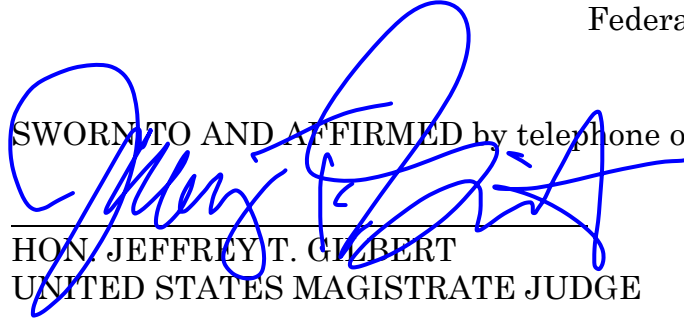
FURTHER AFFIANT SAYETH NOT.

*Daniel Broeckelmann*

DANIEL BROECKELMANN

Special Agent

Federal Bureau of Investigation

 SWORN TO AND AFFIRMED by telephone on December 6, 2023.

HON. JEFFREY T. GILBERT

UNITED STATES MAGISTRATE JUDGE