

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

CASE NUMBER: 1:25-cr-00014

v.

AHMEL HOLMES and
JESUS SANTILLAN

CRIMINAL COMPLAINT

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

Count One

On or about January 8, 2025, at Harvey, in the Northern District of Illinois, Eastern Division, defendant AHMEL HOLMES violated:

*Code Section*Title 18, United States Code,
Section 2114*Offense Description*

robbery of a person having lawful charge, control, or custody of any mail matter or of any money or other property of the United States.

Count Two

On or about January 8, 2025, at Harvey, in the Northern District of Illinois, Eastern Division, defendant JESUS SANTILLAN violated:

*Code Section*Title 18, United States Code, Section
111(a) and (b)*Offense Description*

assaulting, resisting, opposing, impeding, intimidating, or interfering with a person designated in Title 18, United States Code, Section 1114, namely, a Postal Inspector of the United States Postal Inspection Service, while they were engaged in the performance of their official duties, and in the commission of such acts using a deadly and dangerous weapon.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

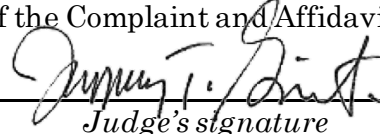


JAMES LACY

Postal Inspector,

United States Postal Inspection Service

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: January 10, 2025
Judge's signatureCity and state: Chicago, IllinoisJEFFREY T. GILBERT, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, James Lacy, being duly sworn, state as follows:

1. I am a Postal Inspector with the United States Postal Inspection Service (“USPIS”). I have been employed by the USPIS since approximately April 2016.

2. As part of my duties as a USPIS Postal Inspector, I am assigned to the USPIS Violent Crimes Team, where I investigate, among other things, crimes such as armed robbery and assault related to the use of the mails and violence against federal officials, including mail carriers and other Postal Inspectors. I have received training and have experience in investigating violations of federal mail laws, including, but not limited to, Title 18, United States Code, Sections 1704, 1708, and 2114. I have participated in numerous investigations that involved armed robberies and assaults in which firearms were used.

3. This affidavit is submitted in support of a criminal complaint alleging that AHMEL HOLMES has committed a robbery of the mails and/or property of the United States using a deadly weapon, in violation of Title 18, United States Code, Section 2214, and that JESUS SANTILLAN, has committed an assault against officers and employees of the United States, in violation of Title 18, United States Code, Section 111(a) and (b).

4. This affidavit is based on my personal knowledge, my training and experience, information provided to me by other law enforcement agents and from

persons with knowledge regarding relevant facts, and the training and experience of other law enforcement personnel. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, 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 defendants committed the alleged offenses.

I. SUMMARY OF FACTS SUPPORTING PROBABLE CAUSE

5. As set forth below, on or about January 8, 2025, Victim 1, a USPS mail carrier, was delivering mail in Harvey, Illinois when a black male with goldish-brown tipped dreadlocks wearing black pants, hoodie, black coat, gray underwear, and white shoes (the “Robber”) approached her with a gun loaded with a drum magazine and demanded her belongings. After the Robber looked through her pockets, the Robber demanded access to Victim 1’s postal vehicle, from which he took a USPS tub containing mail. The robbery of Victim 1 was captured by two surveillance cameras affixed to a nearby residence, and video from that camera corroborates Victim 1’s statements. Moreover, during a photo array presented to Victim 1 within hours of the robbery, Victim 1 identified HOLMES as the Robber. And, at the time of HOLMES’ arrest just hours after the robbery, he was found wearing black pants, hoodie, gray underwear, and white shoes in a residence where two loaded handguns and a drum magazine were subsequently recovered.

6. Two Postal Inspectors, Victims 2 and 3, were dispatched to investigate the robbery of Victim 1, which they did in part by canvassing the area of the robbery.

During their canvass, Victims 2 and 3 observed three individuals in an alley near the scene of the robbery. One of the individuals was a black male, one was a Hispanic male roughly the same height as the black male (“Individual B”), and the third was a Hispanic male who both Victim 2 and Victim 3 observed was noticeably shorter than the other two individuals (the “Shooter”). When Victims 2 and 3 moved toward the three individuals to speak with them, the Shooter pulled out a handgun, pointed it at Victims 2 and 3, and fired. Victims 2 and 3 were not hit and did not return fire but did give chase as the Shooter and the other two individuals ran toward a nearby residence.

7. Postal Inspectors spoke to a woman (“Individual A”) identifying herself as an occupant of the residence. Individual A led Postal Inspectors into the house, where they found a USPS mail tub in the kitchen in plain view. Individual A then led Postal Inspectors to a bedroom, where they found SANTILLAN and, later, .40 caliber ammunition. Victim 3 identified SANTILLAN as the Shooter.

8. Postal Inspectors then went into the basement of the residence, where they found HOLMES and Individual B. In the basement Postal Inspectors also found a Glock nine-millimeter handgun and a plastic bag with mail, a drum magazine, and a disassembled .40 caliber handgun.

9. Postal Inspectors also found two .40 caliber shell casings near the spot from which SANTILLAN fired at Victims 2 and 3. On Individual B’s cell phone, Postal Inspectors found a draft text message that read, in part, “this n**** shot and than police came n it was at a police officer.”

II. FACTS SUPPORTING PROBABLE CAUSE

A. Robbery of Victim 1

10. According to USPS records, Victim 1 is a mail carrier for the United States Postal Service (“USPS”). On or about January 8, 2025, Victim 1 was on official duty as a USPS mail carrier assigned to deliver a route in Harvey, Illinois.

Victim 1’s Statement

11. According to Victim 1, on or about January 8, 2025, at approximately 9:40 a.m., Victim 1 was on duty and completing her assigned mail route. Victim 1 parked a marked USPS vehicle near the intersection of East 158th Street and Union Avenue in Harvey, Illinois.¹ Victim 1 then began to collect mail along East 158th Street. After Victim 1 got out of her USPS vehicle, Victim 1 observed an unknown male (hereinafter “the Robber”) walking across an open field located across East 158th Street to the north of Victim 1. According to Victim 1, the Robber was a black male goldish-brown-tipped dreadlocks wearing a black coat, hoodie, black pants, grey underwear, and white shoes.

12. According to Victim 1, she delivered mail near approximately 606 and 610 East 158th Street, and then the Robber approached Victim 1. The Robber pointed a black handgun with a drum magazine at Victim 1’s stomach and asked if Victim 1 had any money. The Robber then went through Victim 1’s pockets. The Robber

¹ Based upon my training and experience, I know that mail carriers are assigned scanners that log their GPS coordinates while they are on duty. Based on information from the scanner assigned to Victim 1 on or about January 8, 2025, at approximately 9:33 a.m., Victim 1 parked her postal van on East 158th Street and Union Avenue in Harvey. At approximately 9:40 a.m., Victim 1 was located on 600 block of East 158th Street moving eastbound.

demanded that Victim 1 open the USPS vehicle and asked if there were any cameras inside. Victim 1 said there were not. Victim 1 then saw the Robber enter the USPS truck and grab U.S. mail. The Robber exited the USPS vehicle carrying a white USPS mail tub with U.S. mail inside.

13. According to Victim 1, the Robber walked northbound away from East 158th Street and crossed through the same field as he had before the robbery. Victim 1 then called 9-1-1 to report the robbery and notified USPS management.

Surveillance Camera Footage of the Robbery

14. According to information from USPIS Postal Inspectors, USPIS inspectors recovered surveillance camera footage from two different cameras located at the same residence on the 600 block of East 158th Street in Harvey (“Surveillance Camera 1” and “Surveillance Camera 2”). According to my review of the surveillance footage, Surveillance Camera 1 captures video in color, while Surveillance Camera 2 captures video in black and white. Footage from both cameras contains a time stamp in the upper right-hand corner of the screen that shows the time the video was taken.²

15. According to my review of the footage from Surveillance Camera 1, at approximately 9:51 a.m. (10:51 on the video), the Surveillance Camera 1 video depicts Victim 1 walking west on 158th Street when the Robber, who is dressed in all black with a white hooded sweatshirt and white gym shoes, approaches Victim 1 from the rear of a parked vehicle. The video shows Victim 1 with her back to the camera raising

² Based on my knowledge of the investigation and information from USPS scanners, I believe that the timestamp on the videos is approximately 1 hour ahead of the actual time of the events depicted in the video.

her arms with the Robber in front of her. The video shows the Robber going through Victim 1's pockets and pointing an object at Victim 1 while she raises her hands. Below is a still image from the video:



The Surveillance Camera 1 video then shows Victim 1 and the Robber walking west on East 158th Street toward Victim 1's USPS vehicle. Victim 1 opens the side door of the vehicle and the Robber enters the rear of the vehicle. A short time later, the Robber exits the vehicle carrying what appears to be a USPS tub with mail in it.

16. According to my review of the footage from Surveillance Camera 2, after the events described above, the Surveillance Camera 2 footage captures the Robber walking northeast through an open field located between East 158th Street and East 157th Place and between Union Avenue and Wallace Street. The Robber is carrying what appears to be a tub of mail. Below is a still image taken from the Surveillance Camera 2 footage:



Victim 1 Identifies HOLMES as the Robber

17. According to information from USPIS Postal Inspectors and local law enforcement, on or about January 8, 2025, at approximately 4:08 p.m., law enforcement showed Victim 1 an array of approximately six photographs of black males that included a known picture of HOLMES from law enforcement databases.³ Victim 1 identified the picture of HOLMES as the Robber.

B. Assault of Victims 2 and 3

18. According to USPIS records, Victims 2 and 3 are United States Postal Inspectors.

³ Postal Inspectors included a photograph of HOLMES in the photo array based upon the events that followed the robbery, as detailed below.

19. According to information from USPIS Postal Inspectors, on or about January 8, 2025, at approximately 10:40 a.m., Victim 2 and Victim 3 responded to the area of East 158th Street to investigate the robbery of Victim 1 that had occurred earlier that morning.

20. According to USPIS reports, during the course of investigating the robbery of Victim 1, Victims 2 and 3 canvassed the 600 block of East 158th Street in order to obtain residential video surveillance footage. While conducting this canvass, Victims 2 and 3 were each wearing ballistic vests with “Police” and “Federal Agent” markings.

Victim 2 Statement

21. According to Victim 2, while he and Victim 3 canvassed the 600 block of East 158th Street, Victim 3 alerted Victim 2 that there were two unknown males in the area. Victim 2 and Victim 3 then stopped at a residence located at 600 East 158th Street to ask the occupant if they witnessed the robbery or had any surveillance cameras. As they left the residence, Victim 2 observed three unknown males across the street in the backyard of a residence located at 617 East 158th Street. Two of the individuals were similar height, and one was significantly shorter than the other two.

22. According to Victim 2, the inspectors began walking northeast in the direction of the three individuals in order to speak with them. The three individuals then walked southeast between the residences located at 617 East 158th Street and 621 East 158th Street. When the three individuals reached the sidewalk on the north side of East 158th Street, they appeared to Victim 2 to see Victim 2 and Victim 3. The

three individuals then ran back toward the backyard of 617 East 158th Street. The male who was significantly shorter than the other two individuals raised his arms in a shooting stance and pointed at the inspectors. Victim 2 then heard at least one gunshot.

23. According to Victim 2, he and Victim 3 took cover behind a vehicle parked on the street, verbally identified themselves as police, and shouted commands to drop the gun. Victim 2 did not see which direction the subjects ran, so he and Victim 3 ran toward the backyard where they had last seen the three individuals.

24. According to Victim 2, while the inspectors were near 620 East 157th Place (“Subject Residence A”), which is located immediately behind 621 East 158th Street, Victim 2 saw a Hispanic female (“Individual A”) who stated, in substance, “don’t shoot they are only kids they don’t have guns.”⁴ Victim 2 asked Individual A where the three individuals went, but she was not cooperative. Victim 2 and Victim 3 secured the scene around Subject Residence A until backup arrived.

Victim 3 Statement

25. According to Victim 3, he and Victim 2 were canvassing near East 158th Street and Union Avenue after the robbery of Victim 1 when Victim 3 observed two individuals of a similar height: one was a black male with dreadlocks, and the other was a younger-looking male with a light complexion. Victim 3 alerted Victim 2 of the individuals’ presence. Victim 3 and Victim 2 then went to a residence located on the south side of East 158th Street to continue their canvass. While Victim 3 and Victim 2

⁴ Based on my knowledge of the investigation and information from law enforcement databases, SANTILLAN, HOLMES, and Individual B are all more than 18 years old.

were standing outside that residence, Victim 3 observed three individuals across the street walking through an alley located between East 158th Street and East 157th Place. The shortest of the individuals was Hispanic and wearing a black sweatshirt. The shortest individual then walked south, looked in Victim 3's direction, and walked back to join the other two individuals near the alley. The shortest individual (hereinafter, "the Shooter") then took out a pistol and pointed it at Victim 3 and Victim 2. Victim 3 then heard a gunshot.

26. According to Victim 3, he drew his service weapon and took cover behind a vehicle. When he emerged from cover, Victim 3 observed all three individuals running away and he and Victim 2 gave chase on foot. The Shooter ran north toward East 157th Place, and Victim 3 followed. It then appeared to Victim 3 that the Shooter ran toward the Subject Residence A. Victim 3 and Victim 2 established a perimeter at Subject Residence A and requested backup. At some point, Individual A exited Subject Residence A and began yelling, in substance, "why are you chasing them they're just kids".

Evidence Recovered from Subject Residence A

27. According to information from USPIS Postal Inspectors, at approximately 12:30 p.m., Postal Inspectors observed a female ("Individual C") exit Subject Residence A. Inspectors spoke with Individual C, who stated that her mother, Individual A, resided at Subject Residence A. Individual C provided Individual A's phone number and said that Individual A's son lived at Subject Residence A. Inspectors called Individual A and asked whether her son was home, and she initially

said he was not but then said that he was. Individual A then agreed to speak with Postal Inspectors in-person at the front door of Subject Residence A. During that conversation, Individual A stated that her son, SANTILLAN, resided at Subject Residence A and was inside his bedroom. USPIS Postal Inspectors asked to speak with SANTILLAN, and Individual A brought them to SANTILLAN's bedroom, which was on the first floor of Subject Residence A, near the kitchen.

28. According to information from USPIS Postal Inspectors, while following Individual A to SANTILLAN's bedroom, inspectors observed in plain view in the kitchen area a white USPS tub containing what appeared to be multiple packages and mail. Below is a picture depicting the tub:



Inspectors asked Individual A if she was employed by USPS or if the tub belonged to her and she said no. Inspectors asked Individual A if they could take possession of the USPS tub, and Individual A stated yes.

29. According to information from USPIS Postal Inspectors, SANTILLAN opened the door to his bedroom and Inspectors asked SANTILLAN if he would come outside to talk outside on the front porch, which he agreed to do and did. Victim 2 and Victim 3 were present on the porch when SANTILLAN exited the residence. Victim 3 identified SANTILLAN as the Shooter.

30. According to information from USPIS Postal Inspectors, inspectors then requested consent to search SANTILLAN's bedroom. SANTILLAN stated, in substance, that there was nothing in the bedroom and that USPIS could search it if Individual A said it was okay. Inspectors then spoke with Individual A, who provided verbal consent to search the bedroom, where Inspectors found .40 caliber rounds of ammunition and an empty 9 mm shell casing. Additionally, Inspectors located a package near the door of SANTILLAN's bedroom. Inspectors observed that the address on the package did not match the address of Subject Residence A, and that the name on the package did not belong to any of the identified occupants of Subject Residence A. Inspectors asked Individual A if she knew who the package belonged to, and she stated that she did not, and that Inspectors could take it.

31. According to information from USPIS Postal Inspectors, Inspectors walked down the stairs of Subject Residence A into the basement. Inspectors then saw two individuals, a male black (later identified as HOLMES) and a male Hispanic

(Individual B) in an enclosed area on a set of steps leading to the exterior of Subject Residence A. HOLMES was wearing black pants, grey underwear, and white shoes. USPIS agents detained HOLMES and Individual B. A picture of the area where HOLMES and Individual B were found is included below:



32. According to information from USPIS Postal Inspectors, Inspectors asked Individual A for written consent to search Subject Residence A. Individual A gave written consent to search the first floor of Subject Residence A, where she and SANTILLAN resided, but informed Inspectors that there were areas of Subject Residence A that she did not occupy, including the basement, which belonged to the landlord of Subject Residence A.

33. According to information from USPIS Postal Inspectors, Inspectors obtained written consent from the landlord of Subject Residence A to search the basement of Subject Residence A. During the search, Inspectors found a Glock nine-

millimeter handgun on top of an air ductwork. Additionally, Inspectors located, under a pile of spare wood and metal, a white plastic bag.

34. According to information from USPIS Postal Inspectors, the bag discovered under the pile of spare wood and metal contained a disassembled .40 caliber firearm, a drum magazine, ammunition, and mail. Below is a picture depicting the bag in which the drum magazine is visible⁵:

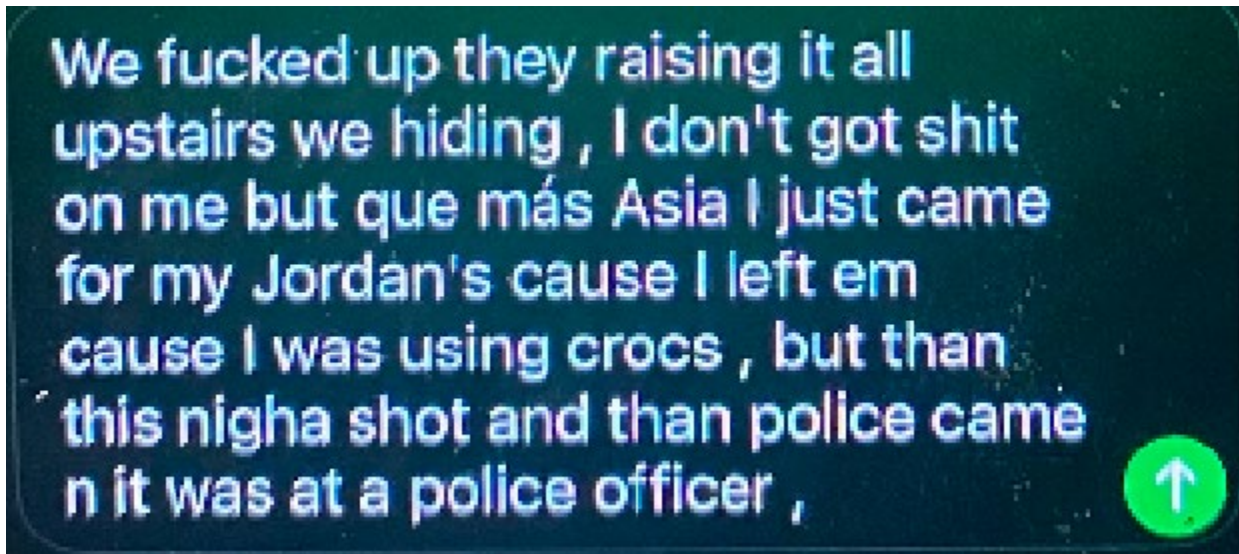


35. According to information from USPIS Postal Inspectors, Inspectors located two expended .40 caliber shell casings in the alley behind Subject Residence A, in the area from which Victims 2 and 3 observed the individual fire at them.

⁵ Based on my knowledge of the investigation, Postal Inspectors have so far refrained from fully unpacking the contents of the bag in order to preserve any potential fingerprint or DNA evidence that may remain on the objects therein.

Individual B Cell Phone Evidence

36. According to information from USPIS Postal Inspectors, Postal Inspectors subsequently provided *Miranda* warnings to Individual B, who agreed to speak with Inspectors and also provided written consent to search his cell phone. On Individual B's phone, Postal Inspectors discovered a draft text message that Individual B was writing to a contact listed in Individual B's phone as "Dad." Below is a picture depicting the draft text message:



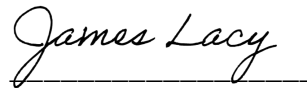
III. CONCLUSION

37. Based upon the foregoing, I believe there is probable cause to believe that, on or about January 8, 2025, at Harvey, in the Northern District of Illinois, Eastern Division, AHMEL HOLMES robbed Victim 1, a person having lawful charge, custody, and control of property of the United States, namely, United States mail, in violation of Title 18, United States Code, Section 2114(a).

38. Based upon the foregoing, I further believe that on or about January 8, 2025, defendant JESUS SANTILLAN forcibly assaulted, resisted, opposed, impeded,

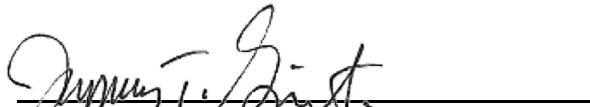
intimidated, and interfered with a person designated in Title 18, United States Code, Section 1114, namely, postal inspectors of the United States Postal Inspection Service, while they were engaged in the performance of their official duties, and in the commission of such acts used a deadly and dangerous weapon, in violation of Title 18, United States Code, Section 111(a) and (b).

FURTHER AFFIANT SAYETH NOT.



James Lacy
Postal Inspector
United States Postal Inspection
Service

SWORN TO AND AFFIRMED by telephone on this 10th day of January, 2025.



Honorable JEFFREY T. GILBERT
United States Magistrate Judge

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