

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ANDRES ADAME, AARON FLORES, and
MANUEL MARTINEZ

CASE NUMBER:

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 October 2, 2019, at Elmwood Park, Illinois, in the Northern District of Illinois, Eastern Division, the defendants violated:

*Code Section*Title 18, United States Code, Section
2113(a)*Offense Description*

by intimidation, took from the person and presence of a bank employee approximately \$2,382 in United States currency belonging to, and in the care, custody, control, management, and possession of a bank, namely, the U.S. Bank located at 7312 West Grand Avenue, Elmwood Park, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

SHANNA K. SAUNDERS

Special Agent

Federal Bureau of Investigation

Sworn to before me and signed in my presence.

Date: October 3, 2019

*Judge's signature*City and state: Chicago, Illinois

JEFFREY I. CUMMINGS, U.S. Magistrate Judge*Printed name and Title*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, SHANNA K. SAUNDERS, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been so employed since September 2017. My current responsibilities include the investigation of violent crimes, including, among others, kidnaping, bank robbery, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that ANDRES ADAME, AARON FLORES, and MANUEL MARTINEZ have violated Title 18, United States Code, Section 2113(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging ADAME, FLORES, and MARTINEZ with bank robbery, 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 offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, information that appears in law enforcement records, interviews of witnesses, my review of surveillance video and photographs, and my training and experience, as well as the training and experience of other law enforcement agents.

I. FACTS SUPPORTING PROBABLE CAUSE

4. In summary, and as described further below, based on video surveillance images, witness interviews, law enforcement surveillance, and law enforcement investigation, there is probable cause to believe that on October 2, 2019, ANDRES ADAME, AARON FLORES, and MANUEL MARTINEZ robbed the U.S. Bank located at 7312 West Grand Avenue, Elmwood Park, Illinois.

October 2, 2019 Robbery of U.S. Bank

5. According to information provided by bank employees and video and photograph surveillance provided by U.S. Bank, which I have reviewed, on October 2, 2019, at approximately 2:38 p.m., two individuals robbed the U.S. Bank located at 7312 West Grand Avenue, Elmwood Park, Illinois.

6. According to my review of the bank's surveillance images, the first individual ("Robber 1") is a male wearing a black, hooded sweatshirt, blue jeans, dark shoes, dark gloves, a baseball-style hat with a red rim, sunglasses, and a light-colored surgical mask over the lower half of his face. The second individual ("Robber 2") is a male wearing a red, hooded zip-up jacket with black panels on the sides and a black zipper, blue jeans, dark shoes, dark gloves, sunglasses, and a light-colored surgical mask over the lower half of his face. The images below are still images from the bank's surveillance footage at the time of the robbery. The first image shows Robber 1 inside the bank and Robber 2 in the far-left background at a teller station. The second image shows Robber 2 at a teller station next to a customer. The third image shows Robber 1 and Robber 2 exiting the bank.





7. According to a U.S. Bank teller who was working at the bank on October 2, 2019 (“Teller A”), Teller A was at a teller station helping another customer when Robber 1 approached the teller counter and pushed the customer out of the way. Robber 1 then said something to the effect of, “Give me all the money. I know you can work faster than that. Hurry! Hurry!” Teller A saw Robber 1 raise his hand and point something in his hand at Teller A, but Teller A could not determine what was in Robber 1’s hand. Teller A gave Robber 1 all of the money in the top drawer. Teller A saw Robber 1 put the money in his pocket, look at Robber 2, who was at another teller’s counter, and then leave the bank.

8. According to Teller A, a GPS tracking device was hidden between twenty dollar bills in the stack of money that Teller A gave to Robber 1.

9. Teller A described Robber 1 as a brown-skinned Hispanic male, approximately mid-twenties to early-thirties in age, and approximately 5'2" to 5'3" in height with a skinny build. Teller A further described Robber 1 as wearing baggy clothes with a gray, hooded sweatshirt and a doctor's mask.

10. Teller A described Robber 2 as a male wearing a red, hooded sweatshirt and a doctor's mask.

11. According to another U.S. Bank teller who was working at the bank on October 2, 2019 ("Teller B"), Teller B was helping a customer and looking down while the customer filled out a form. When Teller B looked up, Teller B noticed Robber 2 walking toward the customer. As there was a line and Robber 2 was walking directly toward the customer, Teller B assumed Robber 2 knew the customer. Robber 2 then pushed the customer out of the way and said something to the effect of, "Give me all your money.... Fast. Fast. Give me all your money." Teller B handed Robber 2 money, and Robber 2 then left the bank.

12. According to Teller B, a GPS tracking device was also hidden between twenty dollar bills in the stack of money that Teller B gave to Robber 2.

13. Teller B described Robber 2 as a Hispanic male approximately 5'8" to 5'9" tall, of medium build, and wearing a red jacket, possibly a hat, and a surgical mask covering his nose and mouth.

14. According to another U.S. Bank employee working on October 2, 2019 (“Employee A”), Employee A followed Robber 1 and Robber 2 as they exited the bank in order to lock the bank’s door behind them. Shortly after the robbers left the bank, Employee A observed a small, gray, older-model sports utility vehicle with a spare tire on the back pull out from the southeast corner of the bank’s parking lot and drive around the bank.

15. A post-robbery audit conducted by U.S. bank showed that approximately \$2,382 was taken during the robbery, including a single \$2 bill.

16. According to records maintained by the Federal Deposit Insurance Corporation (FDIC), at the time of the robbery, the bank’s deposits were insured by the FDIC.

Surveillance Prior to the Robbery

17. Approximately twenty minutes prior to the bank robbery, at or around 2:18 p.m., law enforcement officers conducting surveillance in the area who had prior knowledge of other recent bank robberies involving Honda CR-Vs observed a silver Honda CR-V with partial plate “KDL” (the “Silver CR-V”) parked at a nearby Walgreens, located approximately 0.6 miles away from the U.S. Bank.¹ Law enforcement observed a male individual wearing a gray, hooded sweatshirt, black hat, and black pants, exit the Silver CR-V and enter the Walgreens. According to law enforcement review of surveillance footage from inside the Walgreens, the same male individual and another individual looked at sunglasses, and then one of the two

¹ Based on my training and experience, I know that Honda CR-Vs are sports utility vehicles.

individuals purchased dark gloves. According to law enforcement review of the surveillance footage from inside Walgreens, the faces, clothing, and overall physical appearance of the two male individuals are consistent with those of AARON FLORES and ANDRES ADAME when they were later taken into custody. Law enforcement then observed the male individual in the gray sweatshirt exiting the Walgreens and getting into the driver's seat of the Silver CR-V. According to law enforcement review of surveillance footage from outside of Walgreens, the silver CR-V then drove to the side of the Walgreens and picking up the other male individual who was in the Walgreens. The Silver CR-V then drove southbound on North Harlem Avenue, in the direction of the U.S. Bank. According to the law enforcement officer who observed the individual in the gray sweatshirt, that individual's clothing was consistent with the clothing worn by AARON FLORES when he was later taken into custody.

18. Approximately five minutes prior to the bank robbery of U.S. Bank, at or about 2:33 p.m., a law enforcement officer driving southbound on North Harlem Avenue observed the Silver CR-V driving northbound on the same avenue. As the law enforcement officer's vehicle drove past the Silver CR-V, the officer observed a male individual wearing a gray, hooded sweatshirt driving the Silver CR-V.

Pursuit of Silver CR-V

19. Shortly after the bank robbery, law enforcement officers, who were in the area conducting surveillance and aware that a nearby bank had just been robbed, and who had prior knowledge of other recent bank robberies involving Honda CR-Vs, observed the Silver CR-V driving northbound in an alley near the bank. Other law

enforcement officers on Harlem Avenue observed the Silver CR-V turn southbound onto North Neva Avenue. These officers then followed the Silver CR-V. According to the law enforcement officers who were following the Silver CR-V, the Silver CR-V had three occupants, was speeding approximately ten miles above the posted speed limit, and driving erratically. Law enforcement officers continued following the CR-V from the intersection of West Wrightwood Avenue and North Neva Avenue, and attempted to pull alongside the vehicle in an alley running parallel to North Neva Avenue. While both vehicles were southbound in the alley, the Silver CR-V twice side-swiped the law enforcement vehicle. Officers further observed that the driver of the Silver CR-V was not wearing red clothing. Law enforcement then observed the Silver CR-V collide with a civilian vehicle, and come to a stop in the yard of the residence on the southeast corner of West Altgeld Street and North Neva Avenue. Law enforcement then observed three individuals exit the Silver CR-V. A thin male in a black, hooded sweatshirt exited out of the front passenger seat, and a heavy-set male in a red jacket and thin male in a gray, hooded sweatshirt exited from the driver's side of the vehicle. The male individual in the red jacket, later determined to be MANUEL MARTINEZ, was arrested by law enforcement at the scene. The other two male individuals fled.

20. According to law enforcement officers on the scene, officers immediately began searching the area for the individuals who fled the Silver CR-V. Shortly thereafter, two male individuals were taken into custody in a nearby yard of a residence. One male, later determined to be ANDRES ADAME, was wearing a black,

hooded sweatshirt, and the other male individual, later determined to be AARON FLORES, was wearing a gray, hooded sweatshirt.

Location Monitoring of GPS Tracking Devices

21. Immediately after the bank robbery, law enforcement officers received notification that the GPS tracking devices taken from the U.S. Bank had been moved. Shortly thereafter, using the tracking software issued by the third-party vendor that provides the GPS service to the bank, law enforcement officers were able to monitor the signals emitted by the GPS devices and track their locations in real time following the robbery. Law enforcement was able to track the GPS devices moving south on North Neva Avenue, east on West Wrightwood Avenue, and south in an alley parallel to North Neva Avenue, and as the devices came to a stop at the southeast corner of the intersection of West Altgeld Street and North Neva Avenue in Elmwood Park, Illinois. The movement of the GPS tracking devices is consistent with the route taken by the Silver CR-V.

Recovery of GPS Tracking Devices and Evidence

22. According to a law enforcement database, the Silver CR-V previously had been reported stolen. The license plate on the Silver CR-V also had been reported stolen on or about September 9, 2019. Law enforcement identified the owner of the Silver CR-V and obtained the owner's consent to search the vehicle.

23. During the consent search, law enforcement located and recovered the two GPS tracking devices, each of which was sandwiched between two twenty dollar bills (\$80), and approximately \$1,386 on the right rear floorboard of the vehicle. The

International Mobile Equipment Identity (“IMEI”) numbers of both recovered devices matched the IMEI numbers of the tracking devices assigned to the U.S. Bank that was robbed.

24. Law enforcement also found in the Silver CR-V: (i) an additional approximately \$911 inside a plastic Walgreens bag located on the right rear floorboard; and (ii) a \$5 bill on the front floorboard. The total amount recovered from the vehicle was \$2,382, which was the same amount taken during the bank robbery of U.S. Bank and which also included one \$2 bill.

25. Law enforcement also recovered from the scene a red-billed baseball cap and surgical masks.

Interview of MANUEL MARTINEZ

26. During a *Mirandized* interview, MANUEL MARTINEZ stated, in sum and substance, that he robbed U.S. Bank, and that ADAME, FLORES, and Individual A were also involved in the bank robbery.² According to MARTINEZ, prior to the robbery, Individual A had known that a bank robbery was planned but did not want to be involved. Individual A had dropped MARTINEZ, FLORES, and ADAME off at the Silver CR-V and then left.

27. Also according to MARTINEZ, FLORES then drove MARTINEZ and ADAME in the Silver CR-V to the bank. FLORES stayed inside the Silver CR-V in the bank’s parking lot and was aware that MARTINEZ and ADAME were robbing the bank. MARTINEZ said that he and ADAME entered the bank and that

² MARTINEZ also stated that he knew ADAME by the nickname, “Uber.”

MARTINEZ went to the teller on the right while ADAME went to the teller on the left. MARTINEZ remembered ADAME yelling demands. According to MARTINEZ, he and ADAME both took money from the bank, MARTINEZ put the money in his pocket, and then they fled to the Silver CR-V. FLORES then drove MARTINEZ and ADAME away from the bank. Also according to MARTINEZ, while in the Silver CR-V, ADAME yelled at MARTINEZ to put the money from the robbery into a white plastic bag and told FLORES not to drive fast. MARTINEZ stated that they then got into an accident and were arrested by law enforcement.

Identification of the Defendants

28. ANDRES ADAME is a Hispanic male, 34 years old, with black hair with short black facial hair. Law enforcement found ADAME's Illinois driver's license on him at the time he was taken into custody, and determined that ADAME matched the license photograph and the identifiers on the license. At the time he was taken into custody, ADAME was wearing a black, hooded sweatshirt with no logos, dark gloves, blue jeans, and black shoes and had five Honda keys on his person. Based on law enforcement review of the bank's surveillance images, ADAME's clothing, as well as his general height, weight, and build, appear to match Robber 1.

29. AARON FLORES is a Hispanic male, 21 years old and slim-built, with black hair. FLORES identified himself as "AARON FLORES" at the time he was taken into custody, and law enforcement determined that FLORES matched an Illinois driver's license photograph for "AARON FLORES" in a law enforcement

database. At the time he was taken into custody, FLORES was wearing black utility-style pants, black shoes, and a light gray zip-up hooded sweatshirt.

30. MANUEL MARTINEZ is a Hispanic male, 23 years old and heavy-set, with black hair with a short black beard. MARTINEZ identified himself as “MANUEL MARTINEZ” at the time he was taken into custody, and law enforcement determined that MARTINEZ matched the Illinois driver’s license photograph for “MANUEL MARTINEZ” in a law enforcement database. At the time he was taken into custody, MARTINEZ was wearing a hooded red and black jacket, blue jeans, and black shoes. Based on law enforcement review of the bank’s surveillance images, MARTINEZ’s clothing, as well as general height, weight, and build, appear to match Robber 2.

Conclusion

31. Based on the above information, I respectfully submit that there is probable cause to believe that, on or about October 2, 2019, ANDRES ADAME, AARON FLORES, and MANUEL MARTINEZ, by intimidation, took from the person and presence of bank employees approximately \$2,382 in United States currency belonging to and in the care, custody, control, management, and possession of a bank, namely, the U.S. Bank located at 7312 West Grand Avenue, Elmwood Park, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT.

SHANNA K. SAUNDERS
Special Agent,
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me on October 3, 2019.

JEFFREY I. CUMMINGS
United States Magistrate Judge