

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNDER SEAL

In the Matter of the Search of:

Case Number: 22M525

NOAH RANSOM

APPLICATION AND AFFIDAVIT FOR A SEARCH WARRANT

I, JONATHAN SCHU, a Special Agent of the Federal Bureau of Investigation, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person:

NOAH RANSOM

(a black male, approximately 5'8" tall, weighing approximately 120 pounds, born on or about [REDACTED]) located in the Northern District of Illinois, there is now concealed:

BUCCAL SWAB

The basis for the search under Fed. R. Crim. P. 41(c) is evidence.

The search is related to a violation of:

Code Section

Offense Description

18 U.S.C. § 2119(1)

carjacking

18 U.S.C. § 924(c)(1)(A)(ii)

using a firearm during and in relation to a crime of violence

The application is based on these facts:

See Attached Affidavit,

Continued on the attached sheet.



Applicant's Signature

**JONATHAN SCHU, Special Agent
Federal Bureau of Investigation**

Printed name and title

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



Date: July 12, 2022

Judge's signature

City and State: Chicago, Illinois

M. David Weisman, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, JONATHAN SCHU, being duly sworn, state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation and have been so employed since approximately June 2016. As an FBI Special Agent, my responsibilities include the investigation of violent crimes, including carjacking offenses. The information in this Affidavit is based on my review of pertinent documents and records, interviews of witnesses, information received from other law enforcement agents, my experience and training, and the experience of other law enforcement agents with whom I have consulted. I have participated in investigations that have led to the issuance of search warrants that have yielded evidence concerning carjacking offenses.

2. This Affidavit is submitted in support of an application for a search warrant for samples of DNA contained within cheek cells/saliva (buccal swab) of NOAH RANSOM for evidence concerning violations of Title 18, United States Code, Sections 2119(1) (carjacking) and 924(c)(1)(A)(ii) (using a firearm during and in relation to a crime of violence) (the "Subject Offenses").

3. The statements in this Affidavit are based on my personal knowledge, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts. Because this Affidavit is being

submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are sufficient to obtain a search warrant for samples from RANSOM to submit for DNA comparison.

II. FACTS IN SUPPORT OF PROBABLE CAUSE

4. In summary, and as discussed in more detail below, on April 9, 2022, RANSOM stole Victim A's 2019 Lexus RX350 by pointing a loaded firearm at Victim A and demanding that he get out of the Lexus. Later that morning, law enforcement located the Lexus, along with a loaded firearm, and arrested RANSOM. During a photo lineup, Victim A positively identified RANSOM as the individual who pointed a gun at him and stole his Lexus. Law enforcement took DNA swabs from the Lexus and the firearm. A buccal swab (i.e., a sterile cotton swab used to collect cheek cells and/or saliva) is needed from RANSOM so that testing may be done to compare DNA specimens provided by RANSOM with DNA samples taken from the Lexus and the firearm.

A. Ransom's Use of a Loaded Firearm to Steal Victim A's Lexus

5. According to records and information provided by Lyft, at approximately 3:59 a.m. on April 9, 2022, Victim A picked up Lyft account holder "Moneybagg Uzi" at 600 North State Street, Chicago, Illinois. The scheduled destination was 201 South State Street, Chicago, Illinois.

6. According to information provided by Victim A, on April 9, 2022, Victim A was working as a Lyft driver. Victim A was driving a white 2019 Lexus

RX350, bearing Kentucky license plate BST597. At around 4:00 a.m., Victim A picked up five young black men outside the Embassy Suites by Hilton Hotel located on North State Street in Chicago. One of the men, who was later identified as RANSOM, got into the front-passenger seat of the Lexus. The other four men got into the backseat. The front-seat passenger was wearing white pants and a light olive-colored top, on top of which he had on a black jacket.

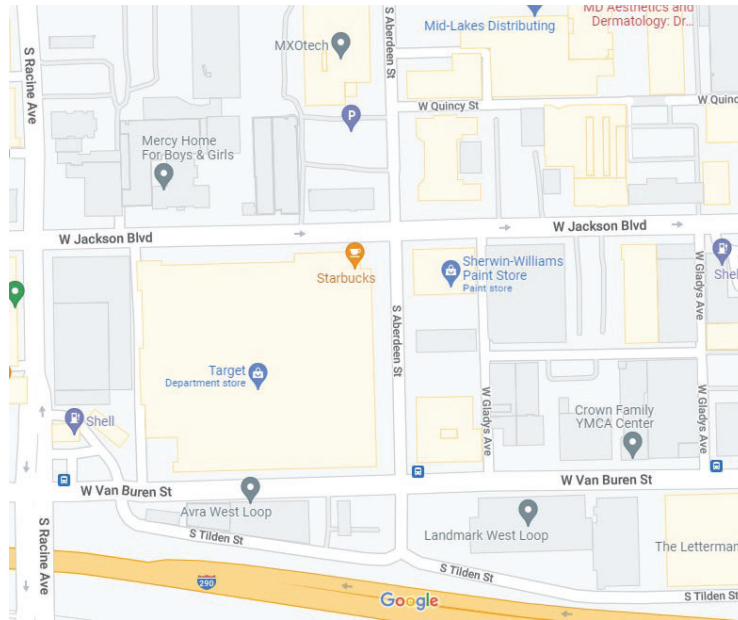
7. Based on my review of video surveillance footage from Embassy Suites by Hilton Hotel and nearby Police Observation Device (POD) video surveillance footage, at approximately 3:59 a.m. on April 9, 2022, five black men exited the Embassy Suites by Hilton Hotel and walked over to Victim A's Lexus. The individual who got into the front-passenger seat of the Lexus was wearing light-colored pants and a dark-colored top.

8. According to information provided by Victim A, as they neared the scheduled drop-off point, the front-seat passenger reached his left arm into the backseat area of the Lexus to get something. Moments later, the front-seat passenger said something to the effect of, "Don't try any funny business. Stop, put your seat back, and get out of the car." When Victim A looked over, the front-seat passenger was pointing a large black gun at Victim A. The gun had a large extended magazine attached to it. The front-seat passenger repeated, "Put your seat back." He then repeated the instruction about putting Victim A's seat back and said something to the effect of, "Don't try anything funny" and "Get out." Fearful that the front-seat passenger was going to shoot him, Victim A stopped the Lexus on Michigan Avenue,

pulled his seat back, and got out of the car. Victim A observed the front-seat passenger move over into the driver's seat and then drive away, heading southbound on Michigan Avenue.

9. Based on my review of POD video surveillance footage, at around 4:07 a.m. on April 9, 2022, Victim A's Lexus pulled over on west-side of Michigan Avenue, near the intersection of Michigan Avenue and Madison Street in Chicago. Victim A got out of the driver-side door of the Lexus, after which the Lexus proceeded southbound on Michigan Avenue.

10. According to records and information provided by the Illinois State Police, at approximately 5:35 a.m. on April 9, 2022, the Illinois State Police identified Victim A's Lexus in the vicinity of 43rd Street and Interstate 94. When the Illinois State Police attempted to pull the Lexus over, the car fled. For approximately 25 minutes, the Illinois State Police pursued the stolen Lexus. At approximately 6:00 a.m., the Illinois State Police initiated a forcible stop technique, known as a 'P.I.T. maneuver,' to stop the Lexus near the intersection of South Tilden Avenue and South Aberdeen Street in Chicago. Six individuals got out of the Lexus and fled northbound on foot. Below is a Google Maps image depicting the vicinity of where the P.I.T. maneuver occurred:



11. Based on my review of dash camera video footage from one of the Illinois State Trooper's vehicles, the individual who got out of the driver-side door of the Lexus following the P.I.T. maneuver was wearing light-colored pants and a dark-colored top. Based on my review of video surveillance footage from the nearby Target and Mercy Home for Boys & Girls, the individual wearing the light-colored pants and a dark-colored top ran northbound through the Target parking garage, across Jackson Boulevard, and into the courtyard for the Mercy Home for Boys & Girls. As he did so, this individual took off the dark-colored top he had been wearing and proceeded to a parking lot located to east of courtyard, where he was apprehended by law enforcement. This individual was NOAH RANSOM.

12. According to records and information provided by the Illinois State Police and the Chicago Police Department, law enforcement recovered a black/gray Polymer80 9mm pistol with an extended magazine on the street where the P.I.T.

maneuver had occurred and individuals had fled from the Lexus. DNA swabs were taken of the Lexus, items contained inside the Lexus, and the firearm.

13. According to records and information provided by the Chicago Police Department and Victim A, an officer with the Chicago Police Department showed Victim A a six-person photo lineup on April 9, 2022. Victim A positively identified RANSOM as the individual who pointed a gun at him and stole his Lexus that day.

14. According to records and information provided by the Illinois States Police and the Chicago Police Department, all six of the individuals who fled from the Lexus were apprehended by law enforcement, including Individual A.¹ During a post-arrest interview, Individual A said that when the Lyft arrived to pick them up at the hotel, RANSOM got into the front-passenger seat of the car. Individual A and three others got into the backseat. At some point, one of the backseat passengers handed RANSOM a firearm. RANSOM told the driver to get out of the car. They then proceeded to pick up a sixth individual by the University of Illinois-Chicago.

B. Person to Be Searched

15. The person to be searched is NOAH RANSOM, a black male who is approximately 5'8" in height, weighs approximately 120 pounds, and was born on or about [REDACTED].


16. A buccal swab is needed from RANSOM so that DNA specimens provided by RANSOM may be compared to DNA samples taken from the Lexus and

¹ According to law enforcement databases, Individual A was charged in the Circuit Court of Cook County, Illinois, with misdemeanor criminal trespass to vehicle.

the firearm. Based on my training and experience, as well as the training and experience of other law enforcement officers with whom I have consulted, there is probable cause to conclude that buccal swabs obtained from RANSOM will provide evidence of the Subject Offenses.


III. CONCLUSION

17. Based on the foregoing, I respectfully submit there is probable cause to believe that a buccal swab sample recovered from the person of NOAH RANSOM will provide evidence of the Subject Offenses.



JONATHAN SCHU
Special Agent
Federal Bureau of Investigation

Subscribed and sworn
before me this by telephone on July 12, 2022



Honorable M. David Weisman
United States Magistrate Judge