
United States District Court

WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

UNITED STATES OF AMERICA

v.

XAVIAR MICHAEL BABUDAR,
a/k/a “@ChiefsAholiC”
[DOB: 07/03/1994]

Count One:

Bank Theft

18 U.S.C. § 2113(c)

NMT 10 Years’ Imprisonment, NMT \$250,000 Fine

NMT 3 Years’ Supervised Release, Class C Felony

Count Two:

Interstate Transportation of Stolen Property

18 U.S.C. § 2314

NMT 10 Years’ Imprisonment, NMT \$250,000 Fine

NMT 3 Years’ Supervised Release, Class C Felony

\$100 Mandatory Special Assessment (Each Count)

CRIMINAL COMPLAINT

Case Number: 23-MJ-00061-JAM (LMC)

1. I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT ONE

2. Between or about March 2, 2022, and April 12, 2022, in the Western District of Missouri and elsewhere, the defendant, **XAVIAR MICHAEL BABUDAR**, did receive, possess, conceal, store, barter, sell, and dispose of approximately \$68,540 in U.S. Currency, which had been taken and carried away, with intent to steal and purloin, from the care, custody, control, management, and possession of the Great Western Bank in Clive, Iowa, the deposits of which were insured by the Federal Deposit Insurance Corporation at the time of such taking and carrying away, knowing said money had been stolen, all in violation of Title 18, United States Code, Section 2113(c).

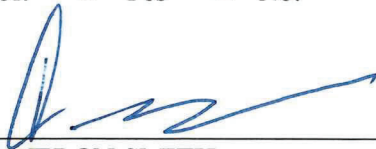
COUNT TWO

3. Between or about March 2, 2022, and April 12, 2022, in the Western District of Missouri and elsewhere, the defendant, **XAVIAR MICHAEL BABUDAR**, did unlawfully transport, transmit, and transfer in interstate and foreign commerce from Clive, Iowa, to Kansas City, Missouri, stolen goods, wares, and

merchandise, that is, approximately \$68,540 in U.S. Currency, knowing the same to have been stolen, converted, and taken by fraud, all in violation of Title 18, United States Code, Section 2314.

4. I further state that I am a Special Agent with the FBI and that this complaint is based on the facts:
(See attached affidavit.)

Continued on the attached sheet and made a part here of: Yes No.



CAMERON SMITH
Special Agent
Federal Bureau of Investigation

Sworn to by telephone

Sworn to before me and ~~subscribed in my presence,~~

May 24, 2023 4:17 PM, May 24, 2023

Date

at

Kansas City, Missouri

City and State

HONORABLE LAJUANA M. COUNTS
United States Magistrate Judge

Name and Title of Judicial Officer

Lajuana M. Counts

Signature of Judicial Officer



AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Cameron Smith, Special Agent with the Federal Bureau of Investigation (“FBI”), being duly sworn, state the following is true and correct to the best of my knowledge and belief:

1. This affidavit is in support of a criminal complaint charging **XAVIAR MICHAEL BABUDAR** (“**BABUDAR**”), also known as Twitter user “@ChiefsAholiC” with bank theft (in violation of 18 U.S.C. § 2113(c)) and interstate transportation of stolen property (in violation of 18 U.S.C. § 2314).

2. The facts and information contained in this affidavit are based in part on my consultation with fellow FBI special agents, forensic accountants, and analysts, local law enforcement officers, responses obtained via search warrants and subpoenas, and an analysis of various financial records. Because this affidavit is being submitted for the limited purpose of supporting the criminal complaint, I have not included each and every fact known to me concerning this investigation, but rather have set forth only the facts that I believe are necessary to establish the necessary foundation for the requested complaint.

PROBABLE CAUSE

3. On December 16, 2022, **BABUDAR** was arrested and charged by the Tulsa County (Oklahoma) District Attorney following a bank robbery in Bixby, Oklahoma. As noted in a story posted to ESPN.com, **BABUDAR** – who in the past enjoyed a robust social media presence as a Kansas City Chiefs superfan Twitter user @ChiefsAholiC – was released on bond in February 2023 four days before Super Bowl LVII, in which the Kansas City Chiefs defeated the Philadelphia Eagles 38-35.¹ In late March 2023, **BABUDAR** removed his ankle monitor and has not yet been

¹ Merrill, Elizabeth and Purdum, David. “The mystery of a Kansas City Chiefs superfan charged with robbery.” *ESPN.com*, Feb. 17, 2023.

recovered by authorities.

4. Since **BABUDAR**'s December 2022 arrest, your Affiant and other investigators with the FBI have undertaken various investigative techniques and have reviewed bank records, casino transaction records, and sensitive financial reporting to determine the breadth and scope of additional potential criminal activities undertaken by **BABUDAR**. For example, your Affiant has reviewed various sensitive financial reports which indicate that between April and December 2022, **BABUDAR** purchased in excess of \$1,000,000 in chips from various casinos in Missouri, Kansas, and Illinois, and over that same time period redeemed a similar amount from said casinos.² Due to **BABUDAR**'s involvement and arrest for the bank robbery in Bixby, Oklahoma, your Affiant and others have reviewed unsolved bank robberies throughout the Midwest over that time to determine a possible provenance of this large volume of money that **BABUDAR** appears to have moved through these casinos and his bank accounts over this time.

5. In the course of this investigation, your Affiant has determined that **BABUDAR** would travel to various locations throughout the Midwestern United States to perpetrate a string of robberies at various banks and credit unions before returning home to the Kansas City Metropolitan area to launder these robbery proceeds through area casinos and deposit these proceeds in his various bank accounts.

https://www.espn.com/nfl/story/_/id/35652559/chiefsaholic-kansas-city-chiefs-superfan-arrested-robbery (accessed Apr. 20, 2023.)

² Your Affiant cautions that the information relayed from these sensitive financial reports is only a summary of that information which the submitting entities chose to include, and may not contain the full universe of transactions (purchases and redemptions) known to the submitting entities. Your Affiant is still receiving the source records which corroborate much of the information originally contained within these sensitive financial reports, but this analysis is ongoing and still incomplete at this time and we continue to reconcile these source records with the sensitive financial reports initially reviewed.

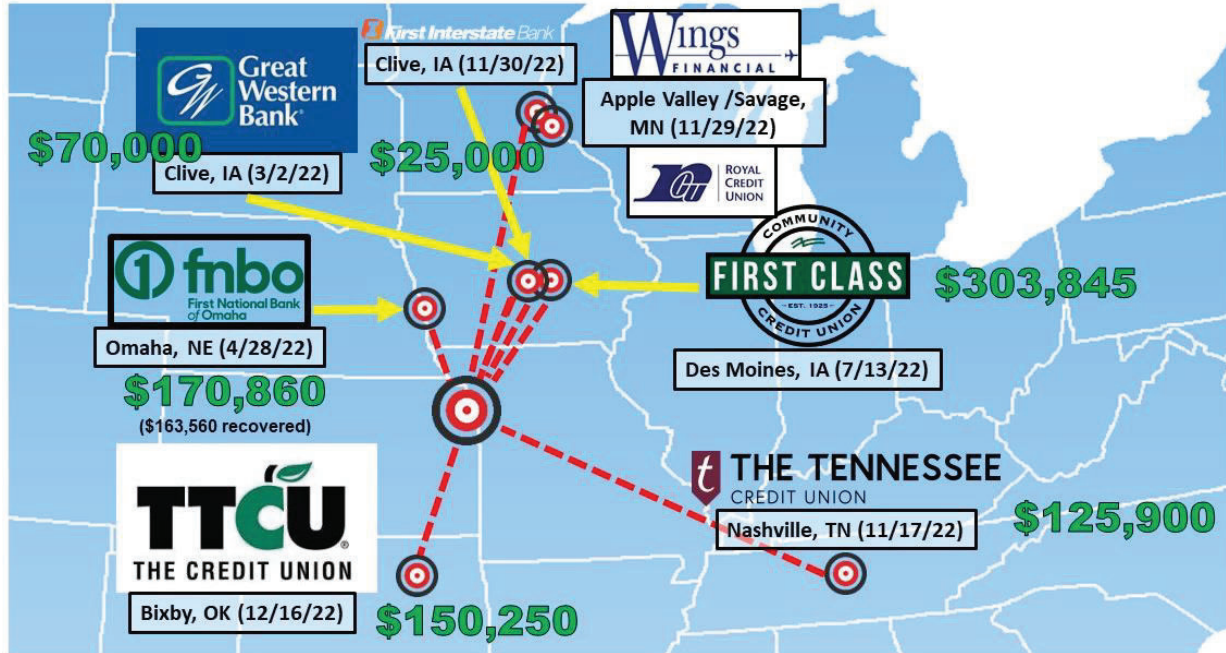


Figure 1 - Demonstrative map displaying various bank robberies (and attempted bank robberies) throughout 2022 which your Affiant believes were perpetrated by **BABUDAR** before he returned back to Kansas City, Missouri with the proceeds from these robberies.

BABUDAR's December 2022 Arrest and Charges For Bank Robbery

6. On December 16, 2022, the Bixby (Oklahoma) Police Department (“BPD”) responded to the Tulsa Teachers Federal Credit Union (“TTCU”), located at 13475 South Memorial Lane, Bixby, Oklahoma, in response to a bank robbery. According to BPD reports, bank employees reported that the bank robbery suspect (later identified as **BABUDAR**), had entered the bank armed with a black handgun, jumped the teller counter, and ordered a bank employee to the back vault. Once at the vault, **BABUDAR** demanded the bank employees to open the vault and to put the money from the vault into a plastic bag. During the bank robbery, **BABUDAR** told bank employees if they did not comply, that he would shoot them. After the money from the vault was placed in the bag, **BABUDAR** fled the bank.

7. A review of security footage from TTCU during the bank robbery identified **BABUDAR** wearing a grey/green hooded sweatshirt, black and yellow gloves, a black paintball

mask, and reflective ski goggles. Security footage also identified **BABUDAR** to be armed with what appeared to be a black and silver handgun.

8. While responding to the TTCU, BPD established a perimeter of the area. BPD officers identified **BABUDAR** fleeing the area on a bicycle, while carrying a large, overstuffed bag. BPD attempted to make contact with **BABUDAR**, but he attempted to flee the area. **BABUDAR** was ultimately taken into custody by BPD. Upon his arrest, **BABUDAR** was found to be in possession of a white plastic bag containing \$150,250 in U.S. Currency, a black handgun (later determined to be a BB-gun), a black ski mask, reflective ski goggles, a pair of black and yellow gloves, and a grey/green hooded sweatshirt. **BABUDAR** was taken into custody and transported to the Tulsa County Jail for Armed Robbery.

9. The following are surveillance photographs of **BABUDAR** during the robbery at TTCU:



10. The following photograph was obtained by BPD of the items recovered from **BABUDAR** following his arrest:



11. Following the arrest of **BABUDAR**, BPD conducted a money count of the U.S. Currency seized from **BABUDAR**. BPD identified the white bag seized from **BABUDAR** incident to arrest to contain \$139,500 in one hundred (\$100) dollar bills and \$10,750 in fifty (\$50) dollar bills, for a total of \$150,250 in U.S. Currency.

12. On December 21, 2022, BPD located a 2019 Mazda 3, bearing Kansas License Plate (KLP) KCC4EVR, parked at 10642 South Memorial Drive, Tulsa, Oklahoma. A record check of KLP KCC4EVR revealed it to be registered to **BABUDAR**. The vehicle was subsequently seized by BPD.

13. On December 22, 2022, BPD obtained a search warrant in the District Court of Tulsa County for **BABUDAR**'s 2019 Mazda 3. A search of the vehicle revealed the following items:

- Barstool Sportsbook Betslip for \$20,000, dated November 19, 2022;
- FanDuel Betslip for \$4,000, dated December 1, 2022;
- Community America Credit Union ("CACU") letter addressed to **BABUDAR**, pertaining to a \$20,000.00 deposit, dated May 2, 2022;
- CACU letter addressed to **BABUDAR**, pertaining to a \$50,000.00 deposit, dated May 2, 2022; and
- CACU letter addressed to **BABUDAR**, confirming a change in contact information for **BABUDAR**, which listed (816) 328-1926 as his phone number. The letter to **BABUDAR** was dated February 3, 2022.

14. Your Affiant was also provided photographs of the gloves and goggles recovered from **BABUDAR**'s vehicle during the search warrant execution. As we note throughout, those items bear similarities to those same items worn by the person captured on surveillance during the previously unsolved bank robberies described in the remainder of this affidavit:





BABUDAR Purchased and Redeemed Over \$1 Million in Chips at Various Casinos Throughout 2022

15. Your Affiant and other FBI investigators have conducted a partial review of sensitive financial reporting which revealed that throughout 2022 **BABUDAR** conducted a large number of casino chip purchases and redemptions from casinos in Missouri, Kansas, and Illinois.

16. Your Affiant has reviewed sensitive financial reporting which revealed that between April 2022 and December 2022, **BABUDAR** purchased approximately \$1,122,000 in casino chips from Argosy Casino (Riverside, Missouri, and Alton, Illinois), Bally's Casino (Kansas City, Missouri), Harrah's Casino (North Kansas City, Missouri), Ameristar Casino (Kansas City, Missouri), Ameristar Casino (St. Charles, Missouri), Hollywood Casino (St. Louis, Missouri), and Hollywood Casino (Kansas City, Kansas).

17. This sensitive financial reporting further revealed that between April 2022 and December 2022, **BABUDAR** redeemed approximately \$1,069,950 in U.S. Currency from casino chips from Argosy Casino (Riverside, Missouri, and Alton, Illinois), Bally's Casino (Kansas City, Missouri), Harrah's Casino (North Kansas City, Missouri), Ameristar Casino (St. Charles, Missouri), and Hollywood Casino (St. Louis, Missouri).

FBI Investigators Reviewed Previously Unsolved Bank Robberies throughout the Midwest in 2022

18. Given **BABUDAR**'s December 2022 arrest and criminal charges relating to the Bixby, Oklahoma bank robbery, and the large volume of cash transactions at area casinos and **BABUDAR**'s bank accounts in the Western District of Missouri, your Affiant and other FBI investigators conducted a review of unsolved bank robberies in the Midwest region to account for **BABUDAR**'s inexplicable access to large amounts of U.S. Currency throughout 2022.

19. In addition to reviewing these unsolved robberies, your Affiant has attempted to account for a legitimate source of the large amounts of U.S. Currency that **BABUDAR** has moved through area casinos and his bank accounts. Your Affiant has consulted with the Kansas Department of Labor, and was advised that **BABUDAR** has not had any reported wages in the state of Kansas since 2018, and has had no reported wages from any other state since October 2021. Your Affiant has also consulted with FBI forensic accountants that have been reviewing financial records for **BABUDAR**, and, other than occasional eBay sales activity, we have not yet detected a consistent source of wages, revenue, or income from any legitimate employment for **BABUDAR** over this time.

20. Your Affiant has also reviewed subscriber records produced by T-Mobile for **BABUDAR**'s known cellular device, which was registered to T-Mobile and assigned the cellular

telephone number (816) 328-1926 (which was previously identified in Paragraph 13). The “Subscriber Details” information associated with this telephone do not include any name or address with this account, and it lists the status as “Deactivated” with a subscriber effective date of August 2, 2021. The sparse and nonexistent subscriber information may be attributed to the “Account Details” section, which indicates that the “Brand” of account was “TRACFONE,” which your Affiant knows to be a pay-as-you-go form of mobile wireless service. This section also indicates the service was terminated on April 1, 2023.

21. While T-Mobile’s records lack any subscriber name associated with this account, there are corroborating details connecting this telephone number to **BABUDAR**. As noted in preceding paragraphs, this telephone number was listed on a change in contact information correspondence from CACU to **BABUDAR**. In addition, your Affiant has reviewed a response from Google relating to the subscriber information for the xaviarbabudar@gmail.com Google account, which lists (816) 328-1926 as the account recovery SMS and telephone number for this account. This same telephone number – (816) 328-1926 – is listed as **BABUDAR**’s in records maintained by St. Louis Gaming Ventures (d/b/a Hollywood Casino) and Harrah’s North Kansas City.

22. In addition to placing **BABUDAR**’s known cellular device in the same cities and locations for these previously unsolved bank robberies and attempted bank robberies, these records also show that **BABUDAR** attended various away games where the Kansas City Chiefs faced off against the Arizona Cardinals (Phoenix, Arizona on September 11, 2022), Indianapolis Colts (Indianapolis, Indiana on September 25, 2022), Tampa Bay Buccaneers (Tampa, Florida on October 2, 2022), Los Angeles Chargers (Los Angeles, California on November 20, 2022), and the Denver Broncos (Denver, Colorado on December 11, 2022). **BABUDAR** was a frequent

presence at Kansas City Chiefs games whether home or away, and this pattern of travel for this known cellular device is consistent with **BABUDAR**'s attendance at these games.

23. Your Affiant has also reviewed bank records from **BABUDAR**'s aforementioned CACU bank statements which place **BABUDAR** in some of these same Kansas City Chiefs away games. For the month of September 2022, **BABUDAR**'s CACU bank account shows charges occurring in Phoenix, Arizona and Glendale, Arizona on September 12, 2022 (corresponding with his suspected attendance at the Chiefs-Cardinals game on September 11, 2022) and at Lucas Oil Stadium in Indianapolis, Indiana with a posting date of September 26, 2022 (corresponding with his suspected attendance at the Chiefs-Colts game on September 25, 2022).

24. **BABUDAR**'s use of this (816) 328-1926 telephone number that is associated with **BABUDAR**'s known cellular device was corroborated by a woman who had met **BABUDAR** in the fall of 2022 at a Kansas City Chiefs game. This woman was interviewed by FBI special agents in late April 2023, and advised these agents that **BABUDAR**'s telephone number was (816) 328-1926. This woman said that she blocked his telephone number after finding out on the news that he was responsible for bank robberies.

25. Your Affiant has also reviewed historical cell site location data for **BABUDAR**'s known cellular device during the date of the TTCU robbery in Bixby, Oklahoma. On December 16, 2022, **BABUDAR**'s known cellular device utilized a cell tower at or near 7835 East 106th Street, Tulsa, Oklahoma 74133 at 9:01 a.m. CST. That location is approximately 3.2 miles north of the TTCU bank robbery, which occurred at approximately 9:47 a.m. CST. Most significantly, the cell tower at or near 7835 East 106th Street, Tulsa, Oklahoma is less than half a mile from where **BABUDAR**'s vehicle was seized by BPD on December 16, 2022.

26. Your Affiant has not observed any further cell site data from **BABUDAR**'s known

cellular device since his December 16, 2022 arrest.

March 2, 2022 Robbery of Great Western Bank (Clive, IA - \$70,000)

27. In the course of this investigation, your Affiant and other FBI special agents learned of a previously unsolved March 2, 2022, bank robbery of the Great Western Bank (“GWB”) branch located at 13150 Hickman Road, Clive, Iowa. Your Affiant reviewed a police report prepared by the Clive (Iowa) Police Department (“CPD”) regarding this bank robbery.

28. According to the CPD report, GWB bank employees identified a suspect entering the bank while wearing a ski mask. The suspect handed the bank teller a note demanding money and indicating he had a firearm. After providing the suspect with money from the bank, the suspect left the bank on foot and fled the area. Following the bank robbery, GWB notified CPD and FBI Omaha that the bank had suffered a loss of \$70,000.

29. The following surveillance photographs were provided by GWB to CPD and FBI Omaha following the bank robbery:



30. Your Affiant has reviewed a photograph of the gloves recovered from **BABUDAR**'s vehicle in December 2022, and observed a pair that looks very similar to the ones

worn by the robber as shown in the screenshot from the GWB robbery:



31. Your Affiant has also reviewed historical cell site location data for **BABUDAR**'s known cellular device on the dates preceding and during the GWB robbery. These records show that **BABUDAR** was in Independence, Missouri on March 1, 2022. On March 2, 2022 – the day GWB was robbed of \$70,000 – **BABURAR**'s known cellular device utilized a cell tower at or near 1755 59th Place, West Des Moines, Iowa at 1:28 a.m. CST. The location of this cell tower is approximately 2 miles south-southwest of the GWB robbery location. Later that day, at approximately 12:47 p.m. CST, **BABUDAR**'s known cellular device utilized another cell tower at or near 3580 109th Street NW, Des Moines, Iowa. That location is approximately 3.1 miles northeast of the GWB robbery location, which occurred at approximately 12:34 p.m. CST.

32. Over the next six weeks, **BABUDAR** deposited the same approximate amount of criminal proceeds that were stolen from the GWB robbery into his CACU money market savings account ending in x1480. This amount was deposited in two separate transactions, the first at the CACU 64th Street Branch located at 6390 N. Cosby Avenue, Kansas City, Missouri, and the

second at the CACU Branch at 825 NE Rice Road, Lee's Summit, Missouri, both of which are within the Western District of Missouri.

33. On March 17, 2022, fifteen days after the GWB robbery, **BABUDAR** deposited \$30,000 in his CACU money market account while at the CACU 64th Street Branch located at 6390 N. Cosby Avenue, Kansas City, Missouri, which is within the Western District of Missouri.

34. After depositing a portion of these proceeds in his CACU money market account, **BABUDAR** engaged in multiple casino chip purchases and redemptions at the Argosy Casino in Riverside, Missouri, which is within the Western District of Missouri. Your Affiant has reviewed casino records produced by Argosy Casino which indicate that, between March 20, 2022, and April 5, 2022, **BABUDAR** cashed in approximately \$97,800 towards casino chips, and cashed out \$106,675 in casino chip redemptions over that same time.

35. On April 12, 2022, approximately forty days after the GWB robbery, **BABUDAR** deposited the remaining balance from this bank robbery – \$40,000 – into his CACU money market account while at the CACU Branch located at 825 NE Rice Road, Lee's Summit, Missouri, which is within the Western District of Missouri.

36. On March 2, 2022, the same date of the GWB robbery, CPD officers consulted with other local law enforcement officers, who advised that a K-9 unit had tracked the bank robbery suspect to the east through the nearby woods and had located one (1) black glove. A CPD officer located the glove in the nearby woods, and sent a photograph of the glove to a CPD detective. This CPD detective showed this photograph to bank witnesses, who confirmed this was the glove that the bank robbery suspect was wearing. This black glove was recovered and was submitted for DNA analysis. In addition, CPD officers located approximately \$1,460 in U.S. Currency in \$20 denominations. Based on the recovery of these funds, investigators believe **BABUDAR** ultimately

stole \$68,540 during the GWB robbery on March 2, 2022.

37. Upon information and belief, your Affiant has learned that, at the time of the March 2022 bank robbery, GWB was organized under the laws of the United States, and was an institution the deposits of which were insured by the Federal Deposit Insurance Corporation. In May 2022, GWB merged with First Interstate Bank, which your Affiant understands to be an institution the deposits of which are insured by the Federal Deposit Insurance Corporation.

April 28, 2022 Robbery of First National Bank of Omaha (Omaha, NE - \$170,680)

38. Your Affiant has reviewed a police report prepared by the Omaha (Nebraska) Police Department (“OPD”) regarding a previously unsolved April 28, 2022, bank robbery of a First National Bank of Omaha (“FNB”) branch in Omaha, Nebraska.

39. According to this report, on April 28, 2022, OPD responded to the FNB branch at 16770 West Maple Road, Omaha, Nebraska, for a bank robbery. Upon responding, FNB employees identified a suspect entering the bank with a firearm and ordering bank employees to open the vault. After bank employees provided the suspect money from the vault and cash drawers, the suspect left on foot and fled the area. During the course of the investigation, OPD determined the suspect was provided with a dye pack that exploded. Per initial FBI reporting, FNB reported the loss to the bank as \$170,860. Upon further review, the loss was determined to be \$170,680 as reported by OPD; however, OPD located \$163,560. The recovered money was located by OPD in a wooded area, covered in red dye.

40. The following surveillance photographs were provided by FNB to OPD and FBI Omaha:



41. Your Affiant has reviewed a photograph of the gloves recovered from **BABUDAR**'s vehicle, and observed a pair that looks very similar to the ones worn by the robber as shown in the screenshot from the FNB robbery:



42. Your Affiant has reviewed sensitive financial reporting which revealed that between April 28, 2022, and July 9, 2022, **BABUDAR** conducted casino chip purchases transactions totaling approximately \$568,000 at casinos in Arizona, Missouri, and Illinois. Your Affiant has reviewed sensitive financial reporting which revealed that between those same dates,

BABUDAR conducted redemptions of casino chips totaling approximately \$662,900 at casinos in Missouri, Oklahoma, Arizona, and Illinois.

43. Your Affiant has also reviewed historical cell site location data for **BABUDAR**'s known cellular device during the date of the FNB robbery. On April 28, 2022, **BABUDAR**'s known cellular device utilized a cell tower at or near 609 North 108th Circle, Omaha, Nebraska 68154 at 10:24 a.m. CST. That location is approximately 7.4 miles west of the FNB robbery location, which occurred at 3:11 p.m. CST. On April 29, 2022, the day following the FNB robbery, **BABUDAR**'s known cellular device utilized various cell towers in St. Joseph, Platte City, and Kansas City, Missouri, which is consistent with **BABUDAR** driving from Omaha back to the Kansas City area.

July 13, 2022 Robbery of First Class Credit Union (Des Moines, IA - \$303,845)

44. Your Affiant has reviewed a police report prepared by the West Des Moines (Iowa) Police Department (“WDMPD”) regarding a previously unsolved July 13, 2022, bank robbery of a First Class Credit Union (“FCCU”) branch in West Des Moines, Iowa.

45. According to this report, on July 13, 2022, WDMPD responded to the FCCU branch located at 2051 Westown Parkway, West Des Moines, Iowa, for a bank robbery. Upon responding to FCCU, bank employees informed WDMPD an unknown suspect entered the bank with a black and silver pistol and jumped over the teller counter. The suspect demanded bank employees to open the bank vault. FCCU bank employees complied with the suspect's demands, and then provided the suspect with currency from the cash drawers and bank vault. The suspect then left the bank on foot and fled the area.

46. Following the bank robbery, FCCU notified WDMPD and FBI Omaha that the bank had suffered a loss of \$303,845.

47. The following surveillance photographs of the bank robbery suspect were obtained from FCCU by WDMPPD:



48. Your Affiant has reviewed a photograph of the gloves recovered from **BABUDAR**'s vehicle, and observed a pair that looks very similar to the ones worn by the robber as shown in the screenshot from the FCCU robbery:



49. Upon information and belief, your Affiant has learned that FCCU is a State-chartered credit union, the accounts of which are insured by the National Credit Union Administration Board.

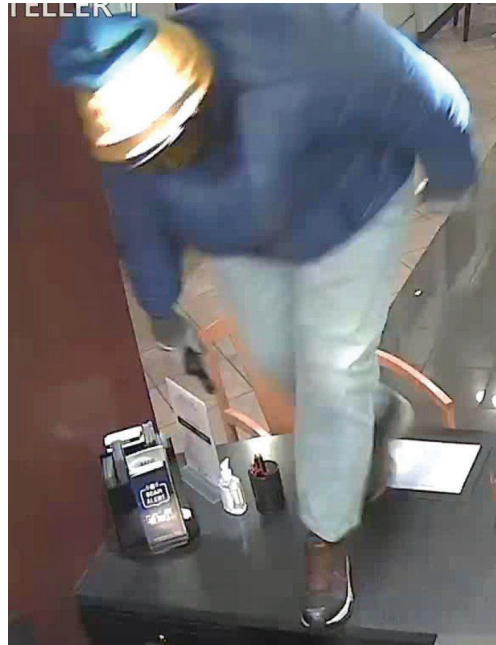
50. Your Affiant has also reviewed historical cell site location data for **BABUDAR**'s known cellular device during the date of the FCCU robbery. On July 13, 2022, **BABUDAR**'s known cellular device utilized a cell tower at or near 1264 225th Avenue, Osceola, Iowa 64068 at 12:59 p.m. CST. That location is 35.7 miles south of the FCCU robbery location, which occurred at 11:52 a.m. CST. Later that day, **BABUDAR**'s known cellular device utilized various cell towers in Liberty, North Kansas City, Independence, and Kansas City, Missouri, which is consistent with **BABUDAR** driving from Iowa back to the Kansas City area.

51. On July 14, 2022, the day following the FCCU robbery, **BABUDAR** deposited \$23,000 in cash in his CACU money market account at the CACU Branch at 825 NE Rice Road, Lee's Summit, Missouri, which is within the Western District of Missouri. On July 15, 16, and 17, 2022, **BABUDAR** purchased \$32,200, \$79,500, and \$20,000 respectively in casino chips from the Ameristar at 1 Ameristar Boulevard, St. Charles, Missouri 63301 for a total of \$131,700. On July 18, 2022, **BABUDAR** deposited another \$40,000 into his CACU money market account using the "shared branch" location of Neighbors Credit Union at 355 Howdershell Road, Florissant, Missouri 63031.

November 17, 2022 Robbery of Tennessee Federal Credit Union (Nashville, TN - \$125,900)

52. Your Affiant has reviewed a police report prepared by the Metropolitan Nashville Police Department ("MNPd") regarding a robbery of a Tennessee Federal Credit Union ("TFCU") branch in Nashville, Tennessee, on November 17, 2022.

53. According to this report, on November 17, 2022, MNPB responded to the TFCU branch located at 7527 Highway 70 South, Nashville, Tennessee, for a bank robbery. Upon responding to TFCU, bank employees informed MNPB and FBI Memphis the suspect entered the bank with a black and silver firearm and climbed over the bank teller counter. The subject pressed the firearm to the victim teller's body and demanded bank employees take him to the vault. TFCU employees complied with the suspect's demands and provided the suspect with currency from the cash drawers and bank vault. The suspect told bank employees if he was given a dye pack he would "come back and put a hole in your head." The suspect then left the bank on foot and fled the area. The credit union suffered a loss of \$125,900. The following surveillance photographs of the bank robbery suspect were obtained from TFCU by MNPB and FBI Memphis:



54. Your Affiant has reviewed a photograph of the gloves recovered from **BABUDAR**'s vehicle, and observed a pair that looks very similar to the ones in the screenshots from the TFCU robbery:



55. Your Affiant has reviewed sensitive financial reporting which revealed that between November 18, 2022, and December 7, 2022, **BABUDAR** conducted 4 casino chip purchase transactions totaling \$130,000 at casinos in Missouri and Kansas. According to this reporting, these casino chip purchases were conducted at Ameristar Casino (St. Charles, Missouri), Hollywood Casino (Kansas City, Kansas), Harrah's Casino (North Kansas City, Missouri), and Argosy Casino (Riverside, Missouri).

56. Your Affiant has reviewed sensitive financial reporting which revealed that between November 18, 2022, and December 7, 2022, **BABUDAR** conducted 3 redemptions of casino chips totaling \$77,400 at casinos in Missouri and Illinois. According to this reporting, these casino chip redemptions were conducted at Harrah's Casino (North Kansas City, Missouri) and Argosy Casino (Alton, Illinois).

57. Your Affiant has also reviewed historical cell site location data for **BABUDAR**'s known cellular device during the date of the TFCU robbery. On November 17, 2022, **BABUDAR**'s known cellular device utilized a cell tower at or near 201 Forrest Valley Drive, Nashville, Tennessee 37221 at 9:44 a.m. CST. That location is approximately 4.4 miles north of the TFCU robbery location, which occurred at 9:26 a.m. CST.

DNA Analysis Matches Glove Recovered from March 2, 2022 Clive, Iowa Robbery to Hat Recovered from November 17, 2022 Nashville, Tennessee Robbery

58. On November 17, 2022, a hat matching the description of the hat worn during the TFCU robbery was collected by the FBI from a wooded area to the south of the robbery location, and that same day the hat was provided to the Tennessee Bureau of Investigation, Nashville Crime Laboratory, for DNA analysis.

59. Your Affiant is aware that on May 17, 2023, the University of Nebraska Medical Center ("UNMC") Human DNA Identification Laboratory notified the FBI that DNA collected and tested by the UNMC from the glove recovered at the March 2, 2022 GWB robbery in Clive, Iowa, matched the DNA collected from the hat recovered following the November 17, 2022 TFCU bank robbery in Nashville, Tennessee. *See* Paragraph 36.

November 29, 2022 Attempted Robbery of Wings Financial Credit Union (Savage, MN)

60. Your Affiant has reviewed a police report prepared by the Savage (Minnesota) Police Department ("SPD") regarding an attempted robbery on November 29, 2022, of a Wings Financial Credit Union ("WFCU") branch in Savage, Minnesota.

61. According to this report, on November 29, 2022, the SPD responded to the WFCU branch located at 14411 Highway 13 South, Savage, Minnesota. Upon responding, WFCU bank employees stated a suspect entered the bank with a firearm and demanded that bank employees

open the vault. Bank employees opened the vault, but upon seeing it only held small bills, the suspect left the bank on foot and fled the area. WFCU suffered no loss in the bank robbery attempt.

62. The following surveillance photograph was provided by WFCU to SPD and FBI Minneapolis:



63. Your Affiant is aware that on December 13, 2022, FBI Minneapolis special agents obtained a search warrant from T-Mobile USA Inc. to obtain cellular tower dump records for the time period and location of the WFCU bank robbery attempt (as well as another attempted robbery which occurred on that same date, which is described in the following section).

64. Your Affiant has been advised that on March 2, 2023, FBI Minneapolis investigators conducted an analysis of the T-Mobile USA Inc. tower dump records obtained through this court order. The analysis revealed that a cellular device assigned telephone number (816) 328-1926, which has since been identified as **BABUDAR**'s known cellular device, was in the location of the WFCU attempted bank robbery in Savage, Minnesota, and in the location of the Royal Credit Union ("RCU") attempted bank robbery in Apple Valley, Minnesota, described below.

65. Your Affiant has also reviewed historical cell site location data for **BABUDAR**'s known cellular device during the date of the attempted robberies of WFCU and RCU. These records show that **BABUDAR**'s known cellular device utilized a cell tower at or near 8320 153rd Place, Savage, Minnesota at 11:40 a.m. CST. The location of this cell tower is approximately 1.6 miles away from the WFCU, which was robbed approximately twenty minutes later at 12:01 p.m. CST.

November 29, 2022 Attempted Robbery of Royal Credit Union (Apple Valley, MN)

66. Your Affiant has reviewed a police report prepared by the Apple Valley (Minnesota) Police Department ("AVPD") regarding an attempted robbery on November 29, 2022, of a RCU branch in Apple Valley, Minnesota.

67. According to this report, on November 29, 2022, AVPD responded to a RCU branch located 14295 Cedar Avenue, Apple Valley, Minnesota, for a bank robbery. Upon responding, RCU bank employees stated a suspect entered the bank with a firearm and demanded that bank employees open the vault. Bank employees opened the vault, but upon seeing it only held small bills, the suspect demanded \$100 bills. Bank employees told the suspect they did not keep \$100 bills in the vault. The suspect did not take any of the money from the vault, and left the bank on foot, fleeing the area. RCU suffered no loss in the bank robbery attempt.

68. The following surveillance photographs were provided by RCU to AVPD and FBI Minneapolis:



69. As noted in a preceding paragraph, your Affiant has been advised an analysis conducted by FBI Minneapolis investigators revealed that the cellular device assigned telephone number (816) 328-1926 which is associated with **BABUDAR** was in the location of the RCU attempted bank robbery in Apple Valley, Minnesota.

70. Your Affiant has also since reviewed historical cell site location data for **BABUDAR**'s known cellular device during the date of the attempted robberies of the WFCU and RCU. These records show that **BABUDAR**'s known cellular device utilized a cell tower at or near 7300 147th Street W, Apple Valley, Minnesota at 1:26 p.m. CST. The location of this cell tower is approximately 0.8 miles away from the RCU, which was robbed approximately eleven minutes later at 1:37 p.m. CST.

November 30, 2022 Robbery of First Interstate Bank (Clive, IA - \$25,000)

71. Your Affiant has reviewed a police report prepared by the CPD regarding the November 30, 2022 robbery of a First Interstate Bank (“FIB”) branch in Clive, Iowa.

72. According to this report, on November 30, 2022, CPD responded to the FIB branch located at 13150 Hickman Road, Clive, Iowa, for a bank robbery. Upon responding, FIB bank employees identified a suspect entering the bank, jumping over the teller counter, and ordering the bank employees to open the vault at gunpoint. After providing the suspect with money from the bank vault, the suspect left the bank on foot and fled the area.

73. Following the bank robbery, FIB notified CPD and FBI Omaha that the bank had suffered a loss of \$25,000.

74. The following surveillance photograph of the bank robbery suspect was provided by FIB to CPD:



75. Your Affiant has reviewed a photograph of the goggles recovered from **BABUDAR**'s vehicle, and observed a pair that looks very similar to the ones worn by the robber as shown in the screenshot from the FIB robbery:



76. Your Affiant has reviewed casino records which revealed that on December 7, 2022, a week after the FIB robbery, **BABUDAR** purchased \$20,000 of casino chips from Harrah's Casino located in North Kansas City, Missouri, which is within the Western District of Missouri. These records further show that on the following day, December 8, 2022, **BABUDAR** redeemed \$32,000 from casino chips from this same casino.

77. Your Affiant has also since reviewed historical cell site location data for **BABUDAR**'s known cellular device on the date of the FIB robbery. On November 30, 2022, **BABUDAR**'s known cellular device utilized a cell tower at or near 4935 78th Street, Urbandale, Iowa 50322 at 11:16 a.m. CST. That location is approximately 6.7 miles northeast of the FIB robbery location, which occurred at 10:18 a.m. CST.

78. Upon information and belief, your Affiant has learned that FIB is organized under the laws of the United States, and is an institution the deposits of which are insured by the Federal Deposit Insurance Corporation.

Summary of Robberies, Attempted Robberies, and Financial Transactions

79. In summary, your Affiant has observed records indicating that **BABUDAR** has engaged in suspicious transactions subsequent to many of these previously unsolved bank robberies from the spring of 2022 through December 2022, or have determined that **BABUDAR** was in close proximity to two unsuccessful bank robberies in which the assailant is dressed similarly to those in the other completed bank robberies:

	Bank	Date	Amount Stolen	Suspicious Transactions (Approximate)	Historical Cell Site Location	Post-Robbery Return to WDMO
1	GWB; Clive, IA	3/2/22	\$70,000	\$70K deposited into BABUDAR 's Community America Credit Union b/w 3/17/22 and 4/12/22; \$68K withdrawn from acct. b/w 4/5/22 and 4/20/22, and \$65K deposited into acct. from casinos b/w 4/15/22 and 4/21/22	West Des Moines, IA	3/17/22
2	FNB; Omaha, NE	4/28/22	\$170,680* *\$163,560 was immediately recovered	\$568K in chip purchases b/w 4/28/22 and 7/9/22; \$662,900 in chip redemptions b/w 4/28/22 and 7/9/22	Omaha, NE	4/29/22
3	FCCU; Des Moines, IA	7/13/22	\$303,845	\$290,000 in chip purchases b/w 7/13/22 and 10/12/22; \$233,400 in chip redemptions b/w 7/13/22 and 10/12/22	West Des Moines and Osceola, IA	7/13/22
4	TFCU; Nashville, TN	11/17/22	\$125,900	\$130k in chip purchases b/w 11/18/22 and 12/7/22; \$77,400 in chip redemptions b/w 11/18/22 and 12/7/22	Nashville, TN	11/19/22

5	WFCU; Savage, MN	11/29/22	N/A	None; cell tower hit on phone	Savage, MN	11/30/22
6	RCU; Apple Valley, MN	11/29/22	N/A	None; cell tower hit on phone	Apple Valley, MN	11/30/22
7	FIB; Clive, IA	11/30/22	\$25,000	\$20k in chip purchases at Harrah's on 12/7/22	Urbandale, IA	11/30/22
8	TTCU; Bixby, OK	12/16/22	\$150,250	N/A; money was in duffel bag recovered from BABUDAR	Tulsa, OK	N/A

Criminal Statutes

80. The crime of bank theft and incidental crimes is found under 18 U.S.C. § 2113(c), which states:

Whoever receives, possesses, conceals, stores, barter, sells, or disposes of, any property or money or other thing of value which has been taken or stolen from a bank, credit union, or savings and loan association in violation of subsection (b), knowing the same to be property which has been stolen...[shall be fined under this title or imprisoned not more than ten years, or both].

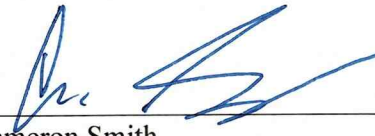
81. The crime of transportation of stolen money is found under 18 U.S.C. § 2314, which states:

Whoever transports, transmits, or transfers in interstate or foreign commerce any goods, wares, merchandise, securities or money, of the value of \$5,000 or more, knowing the same to have been stolen, converted or taken by fraud...[s]hall be fined under this title or imprisoned not more than ten years, or both.

Background of the Affiant

82. I have been employed as a Special Agent of the Federal Bureau of Investigation (FBI) since September of 2018 and am currently assigned to the Complex Financial Crimes Squad in Kansas City. I received my initial training and instruction to become a Special Agent at the FBI Academy located in Quantico, Virginia where I received training concerning violations of the United States criminal statutes. During the normal course of my duties, I conduct investigations involving a variety of criminal violations, to include violations of federal statutes involving bank fraud and wire fraud.

Respectfully submitted,



Cameron Smith
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to me via telephone on May 24, 2023 4:17 PM, May 24, 2023



HON. LAJUANA M. COUNTS
UNITED STATES MAGISTRATE JUDGE

