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<u>AFFDAVIT</u>

I, Lawrence P. Borghini, having been duly sworn, state the following:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been employed as such since April 14, 1996. In my present position as a Special Agent with the FBI, I have participated in and directed numerous criminal investigations and obtained and executed search warrants for evidence relating to criminal violations of Title 18, United State Code. I have also participated in and directed criminal investigations which have resulted in prosecutions for criminal violations of Title 18, United States Code, including criminal activity involving terrorism, public corruption, fraud, and violent crime. This affidavit is submitted in support of the Government's application for an arrest warrant for Lewis Jones, III,

pursuant to Title 18, United States Code, Section 1951, Conspiracy to Interfere with Commerce by Threats or Violence.

- 2. I have not included each and every fact known about the investigation described herein; rather, I have included only those facts I believe are necessary to demonstrate probable cause for the arrest warrants sought. The information in this affidavit is based upon my personal knowledge and observations, on information conveyed to me by other law enforcement officials and witnesses, and on my review of records.
- 3. An ongoing investigation by the FBI and other investigative agencies has revealed that Lewis Jones, III, and others currently unknown have been involved in a

conspiracy to interfere with commerce by threats or violence. More specifically, Lewis Jones, III, and others currently unknown have conspired, confederated, and agreed to commit armed robberies of various jewelry stores throughout the southeast United States. The details of the investigation are set forth below:

## FACTUAL SUMMARY

# A. Panama City Beach Robbery of Reed's Jewelry:

- 4. On or about August 11, 2015, at approximately 10:10 AM CST, a white female entered Reeds Jewelers located at 15601 Starfish Street #110, Panama City Beach, Florida, and displayed a handgun. At gun point, the white female ordered the two store employees to the store's restroom, made them lay face down on the floor, and zip tied the employees' hands. A black male was seen on surveillance video removing the front door stop and letting the front door of the business close while he remained outside of the store. After locking the front door, the white female proceeded to remove approximately \$400,000 worth of jewelry from the display cases and place the various pieces of jewelry in a bag. The surveillance video shows that the white female was the only person in the store other than the store employees during the robbery. The white female was observed with a cellular telephone and wearing a cellular telephone earpiece during the robbery. She was heard speaking to someone during the robbery. At one point during the robbery, the earpiece fell out of the white female's ear and she promptly put it back in. The employees stated the white female had entered the store one day prior to the robbery and asked about various items. Surveillance video from August 10, 2015, confirms the white female was present inside the store one day prior and that she had a cellular telephone in her possession and was wearing an earpiece.
- 5. On August 11, 2015, just prior to the robbery discussed above, at approximately 9:05 AM CST, surveillance video from the Walmart Supercenter located at 15495 Panama City

Beach Parkway, Panama City Beach, Florida, shows the white female driving a maroon Honda Civic LX with tinted windows. The white female parked in the Walmart parking lot and can be seen interacting with a passenger in the vehicle before going into the Walmart. The white female then went to an area within the Walmart where zip ties are located, but exited the store without purchasing anything, and returned to her vehicle.

#### B. Other Robberies:

- 6. On or about April 28, 2015, at approximately 10:10 AM EST, the white female, accompanied by a black male, entered the Jared Vault located at 915 Ridgewalk Parkway, Suite 500, Woodstock, Georgia. The black male displayed a hand gun and had the white female lay down on the floor of the store. The black male ordered the store employees to the back of the store, had them lay face down on the floor of a restroom, and zip tied their hands. When the black male returned, the white female got up and acted as a look out while the black male removed various items from the display cases and placed them in a bag. This robbery predated the Panama City Beach robbery of Reed's Jewelry.
- 7. On or about August 5, 2015, approximately four months later at 10:20 AM EST, the white female entered the Zales Outlet located at 800 GA-400 #960, Dawsonville, Georgia, and displayed a hand gun. She ordered the store employees to the back of the store, had them lay face down, and zip tied their hands. The white female began removing various items from the display cases, but left when another customer entered the store. This robbery predated the Panama City Beach robbery of Reed's Jewelry.
- 8. On or about September 2, 2015, at approximately 10:15 AM EST, the white female entered Jared Vault located at 1414 Fording Island Road, Bluffton, South Carolina, and displayed a hand gun similar to the hand gun used in the Panama City Beach Reed's Jewelry robbery discussed above. The white female ordered the store employees to a back room in the

store, forced them to lay face down, and zip tied their hands. During the South Carolina robbery, the white female can be seen on the surveillance video using a cellular telephone earpiece similar to the earpiece she used during the Panama City Beach robbery of Reed's Jewelry. This robbery occurred approximately one month after the Panama City Beach robbery.

- 9. On or about October 16, 2015, at approximately 9:32 AM EST, the white female entered the Jared Vault jewelry store located at the Tanger Outlet at Five Oaks, 1645 Parkway, Sevierville, Tennessee. After entering the store, the white female walked to the office area, removed a firearm from her purse, and escorted two employees to the back room where they were forced to lay face down on the floor while the white female zip-tied their hands behind their backs. The white female returned to the showroom, locked the front door, and proceeded to steal approximately \$900,000 worth of jewelry.
- 10. On or about December 30, 2015, the white female entered the Reed's Jewelry store at The Shoppes at River Crossing located at 5080 Riverside Drive, Suite 112, Macon, Georgia, shortly after the store opened in the morning. The store manager believed the white female, who had entered the store, matched the appearance and description of the white female linked to armed robberies of various jewelry stores located in Florida, Georgia, South Carolina, and Tennessee. The store manager requested that a second store employee contact law enforcement while the store manager assisted the female who had requested to look at a watch. At that time, a UPS driver entered the store to make his morning delivery. The female appeared to become uncomfortable and left the store. The white female did not rob the Reed's Jewelry located at The Shoppes at River Crossing. This incident occurred approximately 5 months after the Panama City robbery of Reed's Jewelry.
- 11. On or about January 4, 2016, at approximately 10:36 AM EST, members of the Mebane Police Department responded to the Jared Vault jewelry store located at 4000 Arrowhead

Boulevard, Suite 736 Mebane, North Carolina, in reference to an armed robbery. Upon arrival, officers spoke with store employees who reported that an unknown white female entered the store shortly after opening. A short time later, the white female displayed a handgun and ordered the employees into a back room and zip-tied both employees. The suspect left the business and fled in an unknown direction on foot with approximately \$938,352.81 worth of merchandise. This robbery occurred approximately five months after the Panama City Beach robbery.

12. All of the above-described robberies appear to be connected. The robberies all occurred at approximately the same time of day, all involved the white female using a handgun, and all have the same modus operandi (ordering the store employees to the back of the store, having them lay face down, and zip tying their hands).

### C. Identification of White Female Suspect

- and Based upon an analysis of cellular tower information obtained by law enforcement, telephone number (404) 630-2685 appeared at or near the robbery locations in Panama City Beach, Florida, Woodstock, Georgia, and Bluffton, South Carolina, during the time that the robberies discussed above were being committed. A check of law enforcement databases revealed telephone number (404) 630-2685 is associated with an individual named Abigail Kemp. A check of the State of Georgia driver's licenses records produced a Georgia driver's license for Abigail Lee Kemp with an address of .

  '. A further analysis of the telephone records reveal telephone number (404) 630-2685 was in regular communications with
- 14. A check of the State of Georgia motor vehicle registrations revealed that a maroon 2006 four door Honda Civic, bearing tag number PFD5783, is registered to

telephone number (305) 492-3547 at or near the time of the robberies.

Connie Kemp at

. A check of Abigail Lee Kemp's

social media accounts revealed a photograph of a maroon Honda Civic, which your affiant compared to the parking lot surveillance video of the Walmart in Panama City Beach, Florida, and the Pier Park shopping center parking lot where Reed's Jewelry is located. Based on your affiant's observations, training, and experience, the vehicles appear to be the same. A check of the State of Georgia's license plate reader system for Georgia license plate PFD5783 reveals a number of contacts with such vehicle at various locations during the time period of the robberies. Your Affiant reviewed a parking lot surveillance photograph taken as part of the December 2015 investigation into the Macon, Georgia, incident, and observed the unknown white female exiting a dark colored vehicle prior to entering the jewelry store. Accordingly, based upon this photograph and other information obtained as part of the investigation, your Affiant believes the color of the vehicle has been changed from maroon to black.

Vault in Mebane, North Carolina, a number of citizens have contacted law enforcement regarding the female depicted in the surveillance videos that had been released. The citizens have advised law enforcement that the female depicted in the pictures is Abigail Lee Kemp. Some citizens further advised that during recent contacts with Abigail Lee Kemp, she was wearing expensive jewelry that some of the callers believe she cannot afford. Some citizens also advised that Abigail Lee Kemp possesses a black hand gun and recently had her car painted black.

## D. Arrest of Abigail Lee Kemp:

- 16. On or about January 8, 2016, your Affiant obtained an arrest warrant in the Northern District of Florida against Abigail Lee Kemp for conspiracy to interfere with commerce by threats or violence. Law enforcement traced Abigail Lee Kemp to an apartment located at 126 Cumberland Glen Lane, Smyrna, Georgia, and arrested her for committing the armed robberies discussed above.
- At the time of her arrest, Abigail Lee Kemp was accompanied by a black 17. male identified as Lewis Jones, III. Subsequent to the arrest, agents recovered two (2) semi-automatic pistols at the apartment. A loaded black semi-automatic pistol was located on the counter in the kitchen area of the apartment. This semi-automatic pistol was determined to belong to Abigail Lee Kemp. Upon review of a picture of the black semi-automatic pistol and the surveillance video of the Jared Vault in Mebane, North Carolina, your Affiant believes the semi-automatic pistols to be the same and used in the Jared Vault robbery. A second loaded semi-automatic pistol with a silver slide and black frame was recovered from under the bed in a bedroom in the apartment. Agents determined the semi-automatic pistol had been in the possession of Lewis Jones, III, and thrown under the bed at the time the agents entered the apartment. Upon review of a picture of the semi-automatic pistol with a silver slide and black frame and the surveillance video of the Reed's Jewelry in Panama City Beach, Florida, and the Jared Vault in Bluffton, South Carolina, your Affiant believes the black semi-automatic pistols with the silver slide and black frame to be the same and used in the each of the robberies.
- 18. Following her arrest, Abigail Lee Kemp was advised of her rights and agreed to speak with agents. Abigail Lee Kemp stated Lewis Jones, III, who Abigail Lee

Kemp also knew and referred to as "Lou", was involved in the jewelry robberies. In the beginning. Abigail Lee Kemp went in to the jewelry store with an open cellular telephone line so Lewis Jones, III, could hear Abigail Lee Kemp's interaction with the jewelry store employees. Abigail Lee Kemp had an earpiece with microphone attached to her cellular telephone. Lewis Jones, III, then came into the jewelry store, tied the employees up and removed the merchandise from the store's display cases. Abigail Lee Kemp was shown a surveillance picture of the unidentified black male from the April 28, 2015, robbery of the Jared Vault in Woodstock, Georgia. Abigail Lee Kemp identified the black male in the picture as Lewis Jones, III. In the subsequent jewelry store robberies, Abigail Lee Kemp and Lewis Jones, III, communicated with cellular telephones during the robberies. Lewis Jones, III, would remain outside the jewelry store to act as a lookout while Abigail Lee Kemp went inside. Abigail Lee Kemp stated Lewis Jones, III's telephone number is (305) 492-3547. On August 11, 2015, the day of the robbery of the Reed's Jewelers in Panama City Beach, Florida, cellular telephone number (404) 630-2685 (Abigail Lee Kemp's telephone number) was in contact with cellular telephone number (305) 492-3547 (Lewis Jones, III's telephone number) from 10:09 AM CST to 10:15 AM CST. On September 2, 2015, the day of the robbery of the Jared Vault in Bluffton, South Carolina, cellular telephone number (404) 630-2685 (Abigail Lee Kemp's telephone number) was in contact with cellular telephone number (305) 492-3547 (Lewis Jones, III's telephone number) from 10:19 AM EST to 10:40 AM EST. Abigail Lee Kemp further stated that Lewis Jones, III, was on the telephone with her during all the robberies where she went in by herself.

19. Based upon the aforementioned, your affiant believes that there is probable cause to believe that Lewis Jones, III, unlawfully combined, conspired, and confederated with Abigail Lee Kemp and others unknown to interfere with commerce by threats or violence in violation of Title 18, United States Code, Section 1951.

Lawrence P. Borghini

Special Agent

Federal Bureau of Investigation

Subscribed to and sworn before me on this 11<sup>th</sup> day of January, 2016.

United States Magistrate Judge

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