

FILED
1/7/2022

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Andrea L. Campbell (312) 353-5323

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ANTONIO E. COLLINS

CASE NUMBER: 22 CR 12

Judge Harjani

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 December 21, 2021 and January 3, 2022 in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

Title 18, United States Code,
Section 2113(a)

Offense Description

Defendant did, by intimidation, take from the person and presence of bank employees United States currency belonging to, and in the care, custody, control, management, and possession of Chase Bank located at 700 N. Janes Ave. in Bolingbrook, IL, and BMO Harris Bank located at 17600 S. Halsted St. in Homewood, IL, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

This criminal complaint is based upon these facts:

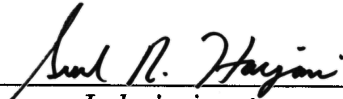
X Continued on the attached sheet.



Daniel Broeckelmann
Special Agent, Federal Bureau of
Investigation (FBI)

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 7, 2022


Judge's signature

City and state: Chicago, Illinois

SUNIL R. HARJANI, U.S. Magistrate Judge
Printed name and title

UNITED STATES DISTRICT COURT)
)
NORTHERN DISTRICT OF ILLINOIS)

AFFIDAVIT

I, Daniel Broeckelmann being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”). I have been so employed since approximately June 2021. Prior to my employment with the FBI, I was a Police Officer with the Bryan, Texas Police Department from 2015 to 2020 and a Detective with the Rosenberg, Texas Police Department from 2020 to 2021. I am currently assigned to the FBI’s South Resident Agency, and my responsibilities include the investigation of bank robberies, narcotics trafficking offenses, weapons offenses and other violent crimes.

2. As part of my duties as a Special Agent, I investigate criminal violations relating to violent crimes and bank robberies. I have been involved with various electronic surveillance methods, the debriefing of defendants, informants, and witnesses, as well as others who have knowledge of the distribution, transportation, storage and importation of controlled substances.

3. This affidavit is made in support of a criminal complaint alleging that ANTONIO E. COLLINS has 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 COLLINS with bank robbery, 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 establish probable cause to believe that the defendant committed the offense alleged in the complaint.

4. The affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, conversations I have had with others who have knowledge of the events and circumstances described herein, interviews of bank employees and other witnesses, review of documents provided by bank personnel and other witnesses, and review of still images from the banks' video surveillance.

FACTS ESTABLISHING PROBABLE CAUSE

I. December 21, 2021 Bank Robbery of the Chase Bank located at 700 N. Janes Ave. in Bolingbrook, IL

5. According to law enforcement reports, on December 21, 2021 at approximately 10:41 a.m. an unknown black male robbed Chase Bank located at 700 Janes Ave in Bolingbrook, IL. As described below, the robber was later identified as ANTONIO E. COLLINS.

6. According to Teller A, who was working teller station "2" at the Chase Bank located at 700 Janes Ave. in Bolingbrook, Illinois, on December 21, 2021, COLLINS, wearing a facemask approximately 5'6-5'8, with a thin build, and weighing approximately 140-160 pounds approached his/her counter and stated words to the effect of "I want to cash a check today." As Teller A went to unlock his/her station, Teller A looked back at COLLINS, who was now holding a manilla envelope that read something to the effect of "You have 20 seconds to give me all the cash you have. If you don't I have a gun. I'll shoot the place up". Teller A obtained the money out of

his/her drawer and gave it to COLLINS. COLLINS stated, "I need more". Teller A advised COLLINS that he/she didn't have any more money. COLLINS stated, "Yes you do". Teller A told COLLINS he/she would have to get the money from another teller. COLLINS fumbled with the money, placed it into an envelope and exited the bank.

7. According to an audit conducted by Chase Bank, the loss to the bank as a result of the aforementioned robbery was \$2,868.00 in United States Currency.

8. According to records, at the time of the robbery on December 21, 2021, the deposits of Chase Bank located at 700 N. Janes Ave. in Bolingbrook, IL was insured by the Federal Deposit Insurance Corporation.

9. Chase Bank security provided law enforcement with still images (taken from surveillance video) of COLLINS from the Chase Bank robbery in Bolingbrook, Illinois. A still image of COLLINS at Teller A's window is depicted below.

II. January 3, 2022 Bank Robbery of the BMO Harris Bank located at 17600 S. Halsted St. in Homewood, IL

10. According to Teller B, who was working at the BMO Harris Bank located at 17600 S. Halsted St. in Homewood, Illinois on January 3, 2022 at approximately



10:45 a.m., he/she was working at his/her teller station when COLLINS approached the counter and stated he wanted to cash a check. COLLINS was holding a note that stated something to the effect of "give me \$30,000 before I start shooting everyone". The note appeared to be written on an envelope that had been ripped along the top. Teller B took approximately \$2,000 from his/her drawer and gave it to COLLINS. COLLINS stated, "No, I want everything". Teller B grabbed mutilated bills that had been crumpled and folded and gave it to COLLINS. COLLINS stated "No, I want everything from the back". Teller B told another employee that the bank was being robbed. Teller B and the other employee retrieved approximately \$18,000 from the vault, returned to COLLINS, and placed the money on the counter. COLLINS placed the money in the pockets of his sweatshirt and fled the bank. COLLINS was described as a black male, light skinned, 25-30 years of age, thin build, wearing a baseball cap, dark balaclava mask, a dark zip up style hoodie.

11. According to an audit conducted by BMO Harris Bank, the loss to the bank as a result of the robbery was \$21,836.00 in United States Currency.

12. According to records, at the time of the robbery on January 3, 2022, the deposits of BMO Harris located at 17600 S. Halsted St. in Homewood, IL was insured by the Federal Deposit Insurance Corporation.

13. BMO Harris security provided law enforcement with still images (taken from surveillance videos) of COLLINS from the BMO Harris Bank robbery in Homewood, Illinois. A still image of COLLINS is depicted below.



01/03/2022 10:44:08.71
Teller 1
Surveillance
EDGEVR19842

III. Identification of 2021 purple Dodge Charger as a Subject Vehicle 1.

14. As part of an investigation into the January 3, 2022, BMO Harris Bank robbery in Homewood, Illinois, law enforcement conducted a canvas of surveillance cameras near the BMO Harris Bank. Law enforcement located video footage from the Walmart located at 17550 S. Halsted St. in Homewood, Illinois. The footage showed COLLINS arrive in a purple Dodge Charger and park adjacent to the BMO Harris bank. Around the timeframe of the robbery, COLLINS exited the vehicle, entered the bank, and left the bank. After COLLINS left the bank, the BMO Harris Bank Manager observed COLLINS enter the driver's side door of a purple Dodge Charger

before leaving the scene. Law enforcement was able to observe on video surveillance that the subject vehicle traveled southbound on Halsted St. The vehicle conducted a U-Turn and then traveled back northbound on Halsted St. towards Interstate 80.

15. According to IDOT records, on January 3, 2021, a purple Dodge Charger, bearing Missouri registration TH3U6A ("**Subject Vehicle 1**") had three separate violations - two prior to the bank robbery and one after the bank robbery. At approximately 9:42 a.m. **Subject Vehicle 1** had a violation on Interstate 294 in the southbound lane at Plaza 41. At approximately 10:38 a.m. **Subject Vehicle 1** had a toll violation at Plaza 47. At approximately 10:51 a.m. **Suspect Vehicle 1** had violation northbound on Interstate 294 at Plaza 41. Law enforcement compared **Subject Vehicle 1** from the video of the tollway violations to the video of the Dodge Charger by the bank driven by COLLINS and has determined that it is the same vehicle.

16. As part of its investigation, law enforcement conducted a search of a law enforcement database of license plate readers in and around the area of the Chase Bank in the morning hours of December 21, 2021. The search revealed that **Subject Vehicle 1** was observed traveling westbound on Boughton Rd. near Interstate 355 at approximately 10:36 a.m. on December 21, 2021. The vehicle was then observed traveling eastbound at 10:45 a.m.

17. Law enforcement determined that **Subject Vehicle 1** was a vehicle rental from Enterprise and contacted the Enterprise Law Enforcement hotline. According to Enterprise, the vehicle had been rented in St. Louis, Missouri on

December 16, 2021, and was overdue to be returned. The vehicle had been rented to a Deandre Wallace, DOB 06/21/1995 with an address of 1115 N. Chestnut in Lansing, Michigan 48905 and phone number 312-220-9165. Law Enforcement agencies conducted a records search and could find no record of a Deandre Wallace with those identifiers, signifying to law enforcement that the name, date of birth, and address combination was fictitious.

18. Additionally, in relation to January 3, 2022, the date of the BMO Harris bank robbery described above, law enforcement learned that **Subject Vehicle 1** had a toll violation on Interstate 294 just before the exit at 127th St in Alsip, Illinois at approximately 10:51 a.m. Based partially on this information, on January 5th, 2022, law enforcement conducted a canvas of motels in Alsip, Illinois and located **Subject Vehicle 1** parked and unoccupied in the northeast parking lot of the Baymont Inn located at 12801 S Cicero Ave in Alsip, Illinois. Law enforcement obtained video surveillance from the hotel which showed **Subject Vehicle 1** pull into the parking lot on January 3, 2022 at approximately 12:59 p.m, approximately 1 ½ hours after the bank robbery in Homewood, Illinois. The video showed the driver of **Subject Vehicle 1** wearing clothing consistent with COLLINS who robbed the BMO Harris bank in Homewood, Illinois. COLLINS exited the vehicle, appeared to pour and unknown substance on the vehicle, and wipe down the inside and outside of the vehicle. COLLINS was picked up by a White KIA Sorrento bearing Arizona registration that started with "CV" and ended with "82".

IV. Identification of 2021 white KIA Sorento as a Subject Vehicle 2.

19. Law enforcement conducted a search of a law enforcement databases of license plate readers and located a White KIA Sorento bearing Arizona registration CVJ6582 ("**Subject Vehicle 2**"). Further investigation revealed that **Subject Vehicle 2** belonged to Avis Rental Cars. Law enforcement contacted Avis Rental Cars and learned that the vehicle was rented to a Deandre Wallace with the same identifiers used to rent the aforementioned **Subject Vehicle 1** in St. Louis, Missouri on December 16, 2021, and was overdue. **Subject Vehicle 1** and **Subject Vehicle 2** were rented within approximately an hour of each other on December 16, 2021, in St. Louis, Missouri.

20. While searching law enforcement databases for **Subject Vehicle 2**, law enforcement learned that on December 22, 2021, a North Riverside Police officer had searched law enforcement databases for **Subject Vehicle 2**. According to the police officer, **Subject Vehicle 2** had been parked on Northgate Ave. near the intersection of 23rd St. in North Riverside, Illinois.

21. At approximately 8:30 a.m. on January 6, 2022, law enforcement located **Subject Vehicle 2** parked in front of 2252 Northgate Ave. North Riverside, Illinois ("**Subject Premises**").

22. Law enforcement established surveillance on **Subject Vehicle 2** and at approximately 1:00 p.m. on January 6, 2022, Law enforcement observed COLLINS, wearing a hooded sweatshirt and shorts walk out of the front door of the **Subject Premises** and enter the passenger's side front and rear door of **Subject Vehicle 2**.

Law enforcement approached and identified ANTONIO E. COLLINS as the individual accessing **Subject Vehicle 2**. COLLINS was in possession of an iPhone in a black case and the keys to **Subject Vehicle 2**.

23. Almost immediately thereafter, law enforcement spoke with Individual A at the **Subject Premises**. Individual A advised she was COLLINS's girlfriend and that she lived at the **Subject Premises**. Individual A provided law enforcement with COLLINS's wallet, which contained his Illinois Driver's license, Concealed Carry card, Illinois FOID card, a Woodforest National Bank card for Michael Jones, and a Citibank card for James Swanigan.

24. Law enforcement spoke with COLLINS and advised him that he was being detained in reference to a bank robbery investigation. COLLINS advised there were two firearms in the residence and that **Subject Vehicle 2** belonged to him.

V. Law Enforcement Interviews of Antonio Collins.

25. COLLINS was transported to the North Riverside Police Department by law enforcement. While at the North Riverside Police Department, COLLINS was advised of his Miranda Rights, which he waived. The interview was audio and video recorded.

26. Initially, COLLINS denied ownership and possession of **Subject Vehicle 1**. COLLINS stated he purchased **Subject Vehicle 2** approximately 1 ½ weeks prior from an individual named "Mark" who lived in Riverdale, Illinois. COLLINS stated "Mark" had rented **Subject Vehicle 2** and that COLLINS had paid "Mark" \$1,000 cash for the vehicle. COLLINS originally denied being involved in the aforementioned bank robberies.

27. After a break, COLLINS requested to speak with law enforcement. COLLINS was readvised of his Miranda Rights, which he waived, and a second audio and video recorded interview with COLLINS was conducted by law enforcement.

28. During the course of the interview, COLLINS admitted to robbing the Chase Bank in Bolingbrook, Illinois and the BMO Harris Bank in Homewood, Illinois. COLLINS admitted to renting both **Subject Vehicle 1 and Subject Vehicle 2** in St. Louis, Missouri and driving them to Chicago after originally flying to St. Louis.

29. Regarding the Chase Bank robbery in Bolingbrook on December 21, 2021, COLLINS admitted that he robbed the bank for approximately \$2,000.

30. In relation to the BMO Harris bank robbery in Homewood, Illinois on January 3, 2022, COLLINS admitted to showing a letter with wording on it to the teller in order to rob the BMO Harris Bank in Homewood, Illinois.

31. According to COLLINS, he left **Subject Vehicle 1** behind a motel and poured bleach over it to clean it because he was “dumping” it. COLLINS admitted that the money from the BMO Harris bank robbery was in his room in a “Timberland” box at the **Subject Premises**. COLLINS stated he had spent the money from the Bolingbrook bank robbery. COLLINS was shown still images of the Bolingbrook and Homewood bank robber and COLLINS identified himself as the person in both images.

VI. Execution of search warrant on January 7, 2022

32. On January 7th, 2022, at approximately 1:30 a.m., a federal search warrant was executed at 2251 Northgate Ave. North Riverside, Illinois. The search yielded the following items:

- A maroon hooded sweatshirt similar in appearance COLLINS's clothing pictured in the Bolingbrook Chase robbery surveillance photographs
- Numerous wads of banded U.S. Currency similar to that which was taken in the Bolingbrook Chase and Homewood BMO Harris bank robberies.

- o Located in a banded wad of \$50 bills were prerecorded bait bills

with serial numbers:

- JJ18612552A
- AB69433815B
- JG24235968A
- AA22384340A
- MD71633943A
- AL01230979*
- CB47202352A
- IK19223697A
- MD29757509A
- JI01492763A

All listed as stolen from the Homewood BMO Harris Bank Robbery.

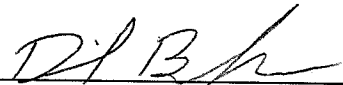
- A Springfield Arms pistol and a Glock pistol
- Photographs of COLLINS with numerous wads of banded U.S. Currency

- A Bail Bond receipt for COLLINS found in the master bedroom closet.

VII. CONCLUSION


33. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that on or about December 21, 2021, ANTONIO E. COLLINS robbed the Chase Bank located at 700 N. Janes Ave. in Bolingbrook, IL, and on or about January 3, 2022, ANTONIO E. COLLINS robbed BMO Harris Bank located at located at 17600 S. Halsted St. in Homewood, IL, in violation of Title 18, United States Code, Sections 2113(a),

FURTHER AFFIANT SAYETH NOT.



Daniel Broeckelmann
Special Agent
Federal Bureau of Investigation

SWORN TO AND AFFIRMED by telephone on January 7, 2022



Honorable SUNIL R. HARJANI
United States Magistrate Judge