

UNITED STATES DISTRICT COURT
for the
Western District of Michigan

United States of America
v.
Darnell Bishop and
Dontrell Nance

Case No.
1:23-mj-516

Defendant(s)

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 the date(s) of November 17, 2023 in the county of Berrien in the
Western District of Michigan, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include 18 U.S.C § 1951 (Hobbs Act Robbery), 18 U.S.C § 924(c)(1)(A)(ii) (Brandishing a Firearm...), 18 U.S.C § 922(u) (Theft of Firearms...), and 18 U.S.C § 922(j) (Knowingly Possessing Stolen Firearms).

This criminal complaint is based on these facts:

See attached continuation

[X] Continued on the attached sheet.

The Court processed the complaint remotely. The Court verified the Affiant's identity (by AUSA confirmation and through Affiant self-identification). Affiant attested to the affidavit and complaint via telephone, which the AUSA transmitted by remote electronic means (e-mail). The Court signed the original complaint and transmitted a correct copy of same to the Applicant, via the AUSA, by remote electronic means (e-mail). The process complied with Rules 3 and 4.1.

Date: 11/20/2023

City and state: Grand Rapids, Michigan

[Handwritten signature of SA Mallorie Campbell]

Complainant's signature

SA Mallorie Campbell, ATF

Printed name and title

[Handwritten signature of Phillip J. Green]

Judge's signature

Phillip J. Green, U.S. Magistrate Judge

Printed name and title

CONTINUATION IN SUPPORT OF
A CRIMINAL COMPLAINT

I, Special Agent Mallorie Campbell, being first duly sworn, hereby state:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been since December of 2021. I am currently assigned to the Detroit Field Division, Grand Rapids Field Office. I have had extensive training at the Federal Law Enforcement Training Center in both the Criminal Investigator Training Program and ATF Special Agent Basic Training.

2. Prior to becoming a Special Agent with ATF, I was employed as a Sheriff's Deputy with the Jefferson County Sheriff's Office in Louisville, Kentucky, for approximately eight years. While with the Jefferson County Sheriff's Office, I was assigned to the Federal Bureau of Investigation's Louisville, Kentucky, White Collar Crimes Task Force for approximately four years. As an FBI TFO and as a Special Agent with the ATF, I have participated in numerous state and federal investigations to include theft of Federal Firearms Licensees (FFLs), other firearms investigations, financial crimes, healthcare fraud, illegal narcotics investigations, gang investigations, and human trafficking investigations, among others.

3. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

4. Based on a joint state/local/federal investigation in this matter, there is probable cause showing that Darnell BISHOP and Dontrell NANCE committed, or aided and abetted, violations of the following offenses:

- a. Title 18 U.S.C § 1951 (Hobbs Act Robbery)
- b. Title 18 U.S.C § 924(c)(1)(A)(ii) (Brandishing a Firearm During and in Relation to a Crime of Violence)
- c. Title 18 U.S.C § 922(u) (Theft of Firearms from a Federal Firearms Licensee)
- d. Title 18 U.S.C, § 922(j) (Knowingly Possessing Stolen Firearms)

PROBABLE CAUSE

5. On November 17, 2023, at approximately 2:00 am, the Benton Township Police Department received a call for service from the manager of the Dunham's Sports in Benton Harbor, Michigan ("the Manager"). The Manager told investigators that at approximately 9:55 pm on November 16, 2023, two unknown subjects approached him outside his Benton Harbor home, held him at gunpoint, and then blindfolded, handcuffed, and placed him in the backseat of his own car. The individuals drove the Manager to an unknown area, where one of the subjects began threatening him and interrogating him regarding the alarm and security features at Dunham's Sports. The Manager stated that one of the subjects held a gun to his head and made him reveal the passcode to the alarm at the store. The Manager explained that one of the subjects left the area with the Manager's keys to the store. The other subject remained with the Manager and held him against his will.

6. Investigators reviewed surveillance footage from Dunham's, which showed that at approximately 10:40 pm on November 16, 2023, a male entered Dunham's and disabled the alarm system with the security code. The male then proceeded through the store and grabbed a pair of sunglasses. The subject took two (2) large blue Yeti coolers with black handles and black wheels and proceeded to the firearms section of the store. The subject loaded the two coolers full of handguns and exited the store with one cooler at approximately 11:08 pm. The subject then returned to Dunham's at approximately 11:52 pm and exited the store with the second cooler at 11:54 pm.

7. ATF Industry Operations Investigators (IOI) and Dunham's audited the store's merchandise and determined that 123 handguns were missing.

8. The Manager told investigators that during the kidnapping, one of the suspects tried to use CashApp (an online money transfer program), to send money from the Manager's debit card to another CashApp account. The transaction was not successful. Investigators reviewed the Manager's bank records which showed an attempted CashApp transaction to a "Dontrell Nanc." A query of "Dontrell Nanc" revealed a possible match, Dontrell NANCE, an individual currently on parole with the Michigan Department of Corrections (MDOC) in Berrien County, Michigan. A query of MDOC records revealed that NANCE had a contact number of 269-605-9494. A query of the phone number in CashApp revealed a CashApp account for a "Dontrell Nance" with a photo matching Dontrell NANCE. Investigators searched the Michigan State Law Enforcement Information Network (LEIN) and found NANCE had been convicted of Felony Unarmed Robbery in 2016.

9. During the morning of November 17, 2023, investigators began surveillance of NANCE at his residence on Council Drive in Benton Harbor, Michigan. Investigators observed NANCE with another Black male. Investigators identified the second man as Darnell BISHOP, NANCE's brother.

10. Investigators observed NANCE, BISHOP, and an unknown male ("UM1") at 203 Madeline Avenue, Benton Harbor, Michigan, within Benton Manor apartment complex. The group was observed standing near a Red Dodge Durango. When the three males opened the trunk of the Durango, investigators observed two (2) coolers in the trunk compartment. BISHOP is shown below outside the Durango wearing a blue sweatshirt; NANCE is wearing the black jacket with backpack.



11. The coolers in the Durango appeared consistent with the blue Yeti coolers stolen from Dunham's. Investigators could see the sales tags still affixed to the lids of the coolers. Investigators watched NANCE, BISHOP, and UM1 carry the coolers into the apartment located at 203 Madeline Avenue.

12. On November 17, 2023, at approximately 12:45 pm, NANCE and UM1 came back out of the residence carrying one of the coolers. They loaded the cooler back into the Durango and then left in a Chrysler Sebring. Police stopped the Sebring as it left the apartment complex. Investigators took NANCE into custody on an outstanding MDOC parole absconding warrant.

13. On November 17, 2023, at approximately 1:00 pm, investigators observed BISHOP walking out of the back door of 203 Madeline Avenue carrying a white bag and a child's winter hat. Investigators arrested BISHOP. Investigators searched the white bag incident to arrest and found an assortment of Dunham's firearm sales tags.

14. On November 17, 2023, investigators obtained and executed State of Michigan search warrants for residences and vehicles associated with NANCE and BISHOP, including for the Durango and 203 Madeline Avenue. Investigators found one cooler taken from Dunham's inside of the Red Dodge Durango. They found a second cooler from Dunham's in 203 Madeline Avenue. Inside the coolers were a total of 120 firearms (shown below); most of the handguns had trigger guard security locks still attached. Investigators compared the serial numbers on these guns to the records of the guns stolen from Dunham's and determined that they matched. Two additional firearms stolen from Dunham's (as determined by the serial numbers) were found hidden in the basement of 203 Madeline Avenue. Investigators found a Taurus pistol, not stolen from Dunham's, in an upstairs bedroom.



15. Investigators read BISHOP and NANCE their Miranda warnings and both men agreed to waive their rights and speak to investigators.

16. NANCE told investigators that he was part of the robbery. Specifically, he said that he stayed with the Manager while BISHOP went to get the firearms from Dunham's. NANCE claimed that he put his cell phone in a sock and held that against the Manager, implying it was a

gun. NANCE stated that he had acted as the lookout for BISHOP and another participant in the robbery.

17. BISHOP also admitted that he was part of the robbery. He said that he had previously cased Dunham's and followed the Manager in preparation for the robbery. BISHOP said that he pointed a Taurus pistol at the Manager during the robbery. BISHOP admitted he was the one who typed in the alarm code at Dunham's and took the guns inside. He told investigators that when he moved the cooler at 203 Madeline, two guns fell out.

18. The Benton Harbor Dunham's is a federally licensed firearm licensee. It customarily purchases goods from outside the state of Michigan. All of the stolen guns were manufactured outside the State of Michigan and were shipped through interstate commerce before being stolen.

CONCLUSION

19. Based on the aforementioned facts, I submit that there is probable cause showing that Darnell BISHOP and Dontrell NANCE committed, or aided and abetted, violations of the following offenses in the Western District of Michigan:

- a. Title 18 U.S.C § 1951 (Hobbs Act Robbery)
- b. Title 18 U.S.C § 924(c)(1)(A)(ii) (Brandishing a Firearm During and in Relation to a Crime of Violence)
- c. Title 18 U.S.C § 922(u) (Theft of Firearms from a Federal Firearms Licensee)
- d. Title 18 U.S.C, § 922(j) (Knowingly Possessing Stolen Firearms)