

22-mj-4366-DHH

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Mark E. O'Brien, being duly sworn, do hereby depose and state:

Introduction and Background

1. I am a Massachusetts State Trooper and Task Force Officer ("TFO") currently assigned to the FBI Boston Division's Violent Crime Task Force ("VCTF"), which is comprised of law enforcement personnel from the FBI, Boston Police Department ("BPD"), Massachusetts State Police ("MSP"), Braintree, Malden, Somerville, and Dedham Police Departments. I have been a MSP trooper since March 2012 and have been assigned to the VCTF since 2019 and am employed in a full-time capacity. As a TFO, I have responded to, conducted and investigated a number of bank robberies, burglaries, and Hobbs Act offenses, and have also worked with local, state and federal law enforcement officials on multiple bank robbery investigations.
2. Prior to my assignment to the Violent Crimes Task Force, I was assigned to the MSP Attorney General's State Police Detective Unit ("AGO-SPDU") Enterprise and Major Crimes Section from 2015 to 2019, where I conducted and assisted with complex long-term investigations in narcotic, human trafficking, organized crime, gaming and money laundering investigations. Prior to my assignment with the AGO-SPDU, from March 2012 to 2015, I was assigned to MSP Division of Field Services Danvers Barracks.
3. I am aware that 18 U.S.C. § 2113(a) makes it a crime to use force and violence, or intimidation, to take, or attempt to take, from the person or presence of another, any property or money or any other thing of value belonging to, or in the care custody, control, management, or possession of, any federally insured bank.

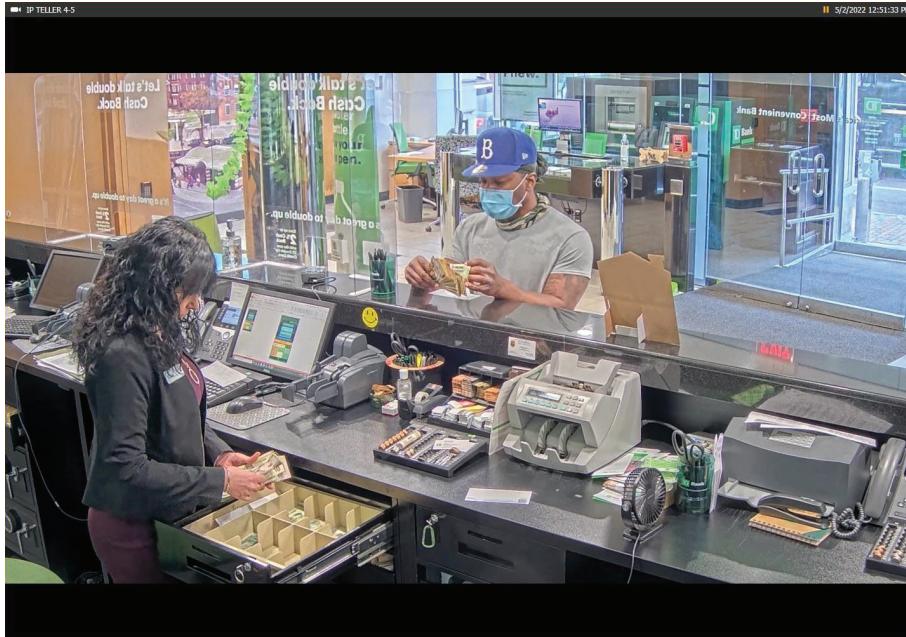
4. I make this affidavit in support of a criminal complaint and arrest warrant charging Jalонни Али Шабазз, а/к/а Jalонни Тукер (“SHABAZZ”), year of birth 1982, with the robbery of TD Bank, located at 1270 Massachusetts Avenue, Cambridge, Massachusetts on May 2, 2022, in violation of 18 U.S.C. § 2113(a). TD Bank is a bank for purposes of 18 U.S.C. § 2113(a), and on the date of this robbery, it was insured by the Federal Deposit Insurance Corporation (“FDIC”).

5. This affidavit is submitted for the limited purpose of establishing probable cause to believe SHABAZZ violated the above-referenced federal statute. It, therefore, does not contain all the information that I and other law enforcement personnel have obtained during the course of this investigation.

STATEMENT OF PROBABLE CAUSE

TD Bank Robbery

6. On May 2, 2022, at approximately 12:49 pm, an unidentified black male (“suspect”) entered the TD Bank located at 1270 Massachusetts Ave in Cambridge. On the date of the robbery, the bank was equipped with video surveillance cameras. The surveillance system was operating at the time of the robbery and captured images of the subject inside the bank. The suspect was captured on surveillance footage by the TD Bank interior surveillance cameras dressed in a gray T-shirt, a royal blue baseball hat with the letter “B” in white located on the front of the hat, a garment (i.e., durag) located under his baseball hat, and was wearing a medical mask on his face, a camouflage pattern garment around his neck, a gray short sleeved t-shirt, gray pants and white sneakers. Below is one image of the suspect captured by TD Bank surveillance:



7. After entering TD Bank, the suspect approached the deposit slip counter where he stood momentarily before approaching RD's teller counter.¹ The suspect handed RD a robbery note that read as follows: "All of the Money - No Dye packs - or alarms." RD then asked the suspect if he would like to make a deposit and the suspect then told RD "this is a robbery honey." The teller located in the next teller counter window hit the panic alarm. RD stated she gave the suspect a little more than \$2,200 in U.S. currency from the bank. The suspect manipulated the cash and placed the bundle containing the GPS tracker on the teller counter and stated "No GPS." The suspect left that bundle on the teller counter but took the remaining cash. In total, the suspect stole \$2,200 in U.S. currency from the bank. After taking the money, the suspect left the bank and fled on foot. The suspect was last seen by bank employees to be traveling on foot down Plympton Street. TD Bank is located on the corner of Massachusetts Avenue and Plympton Street.

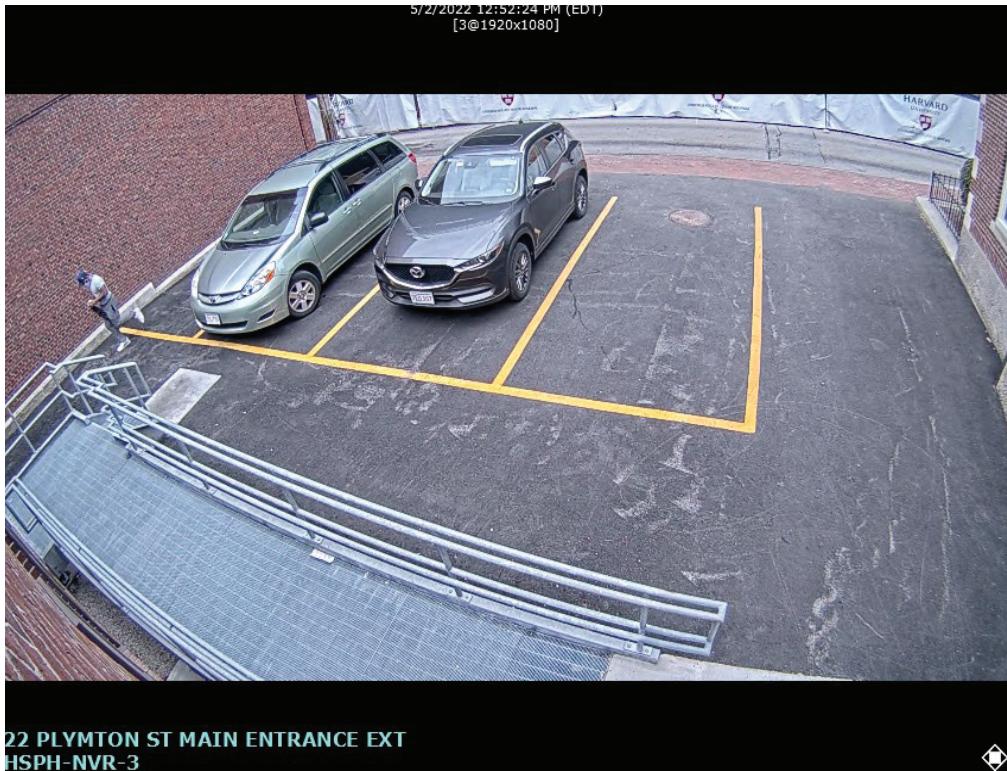
¹ Law enforcement is aware of the first and last name of the teller but for safety purposes, the teller's initials are being used herein. Also, English is RD's secondary language.

8. A short time later, I, as well as other law enforcement officials, responded to the TD Bank. Upon my arrival, I met with members of the Cambridge Police Department (“CPD”), other members of the VCTF, as well as TD Bank employees. While at the bank, I interviewed teller RD. RD described the suspect, who was captured on TD Bank surveillance footage, as a black, muscular male, approximately 5’8” to 5’11” tall, with tattoos and wearing a blue hat with a “B” on it, a gray shirt and a durag under his hat. Per RD, the suspect approached the teller counter and presented a note which RD pretended to be unable to read. RD told authorities that RD thought the note said “50 and 100’s, no dye packs” but RD related that RD was confused between this robbery and a prior bank robbery at TD Bank that she was a victim of which occurred within the preceding approximately two weeks. Per RD, the suspect told RD “this is a robbery honey.” RD then handed the suspect approximately \$580 in U.S. currency which contained a GPS tracking device. However, the suspect discovered the GPS, placed it and the cash with it on the teller counter and told RD words to the effect “Honey I told you no bait money.” RD grabbed another stack of bills and gave that money to the suspect who took the money and left the bank with approximately \$2,200 in U.S. currency.

9. Shortly after arriving to the bank, investigators searched the surrounding area for evidence and discovered a royal blue hat on the ground in the vicinity of 3 Bow Street in front of Cambridge Eating Disorder Center (“CEDC”), which is a short distance from the TD Bank. The hat appeared consistent with the hat worn by the suspect during the robbery. Photographs of the hat were taken by law enforcement and it was secured as evidence. On May 5, 2022, I transported the hat from CPD to the MSP Crime Lab for forensic testing.

10. Law enforcement obtained surveillance footage from different cameras, including the area of 22 Plympton Street during the approximate time of the TD Bank robbery that occurred on

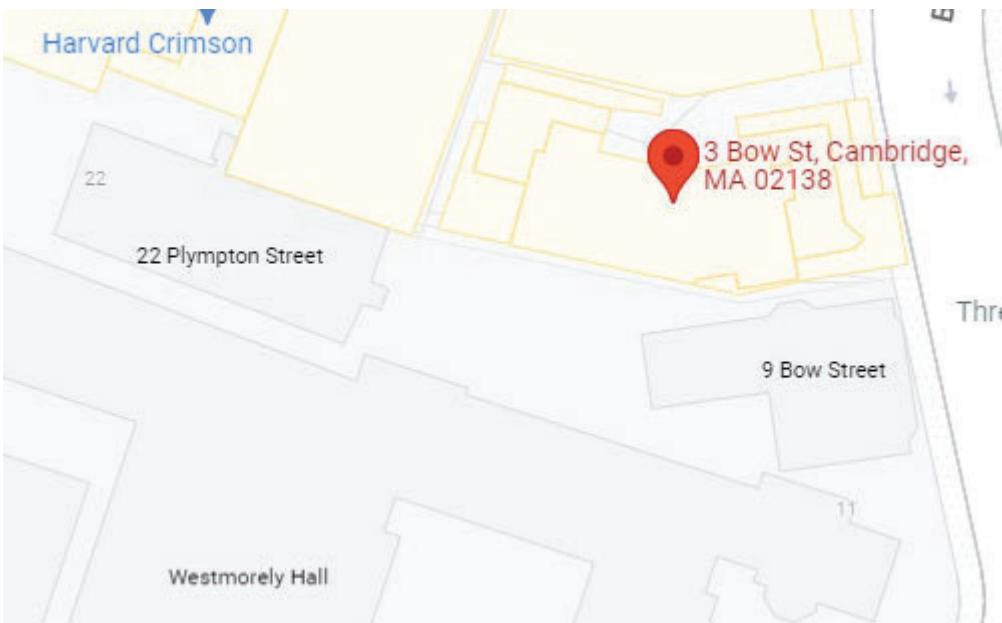
May 2, 2022. Per Google Maps, that address is located 187 feet from the TD Bank. I have reviewed that video surveillance. That surveillance footage from the 22 Plympton Street main entrance view depicts the suspect wearing a baseball hat, carrying a back pack and walking up Plympton Street at approximately 12:47 pm, which was a couple of minutes prior to the bank robbery. This location is adjacent to an alley that leads to Bow Street. Other surveillance footage from a camera focused on the roof of 22 Plympton Street depicts the suspect placing a backpack into a recycling bin located behind 22 Plympton Street at approximately 12:48:20. The suspect re-appears on the surveillance at approximately 12:48:45, without the backpack walking in the direction of the TD Bank. Thereafter, at approximately 12:49pm, the suspect is captured on TD Bank surveillance footage entering the TD Bank. Approximately three minute later, at 12:52pm, video surveillance footage from the 22 Plympton Steet surveillance camera captures the subject running down Plympton Street. At this point, the suspect is no longer wearing a garment on his head and is carrying the blue hat in his hand, and his blond hair on his head is observed. The suspect places his hat back on prior to exiting the view of this camera enroute to the rear of 22 Plympton Street. An image from the 22 Plympton Street roof camera at approximately 12:52:35 captures the suspect wearing his hat and retrieving the backpack from the blue recycling bin behind 22 Plympton Street. Below is a May 2, 2022, surveillance image obtained from the Harvard University Police Department from camera(s) affixed to 22 Plympton Street which depicts the suspect wearing the royal blue hat. The time on the camera is approximately 1 minute after the TD Bank robbery:



11. Additional video surveillance from May 2, 2022, was recovered by CPD from the CEDC located at 3 Bow Street. I have reviewed that video surveillance. The surveillance depicts the suspect running through the Bow Street alley and discarding a hat in the vicinity of 3 Bow Street at approximately 12:54 pm, which was minutes after the TD Bank robbery. As stated above, on May 2, 2022, the hat was recovered by law enforcement on the ground at that location. Below is a surveillance image obtained from the CEDC which depicts the suspect holding the blue hat, his blond hair is now visible, and he has the bag he retrieved from the recycling bin located behind 22 Plympton Street:



12. The Google Maps image below provides a point of reference of the alley connecting 22 Plympton to 3 Bow Street:



Identification of SHABAZZ, a/k/a TUCKER

13. In connection with this investigation, on May 20, 2022, the MSP Crime Lab provided me with a Combined DNA Index System (“CODIS”) notification and report. Per the report, DNA

obtained from the strap and interior headband of the blue baseball hat recovered on Bow Street on May 2, 2022, belonged to SHABAZZ, a/k/a Tucker.

14. I have reviewed SHABAZZ's, a/k/a Tucker's, criminal history and learned that he was previously convicted of two federal bank robbery offenses. Specifically, in 2017, SHABAZZ, a/k/a Tucker, was sentenced to 54 months in federal prison followed by three years supervised released and ordered to pay restitution. *See Case No. 16-CR-10304-LTS.* SHABAZZ, a/k/a Tucker, was on supervised release at the time of the TD Bank robbery. On or about May 23, 2022, the U.S. Probation Officer ("USPO") assigned to supervise SHABAZZ was contacted and informed that SHABAZZ, a/k/a Tucker, was a person of interest in a May 2, 2022, bank robbery at TD Bank and a May 20, 2022 bank robbery at People's United Bank in Boston.² In connection with this overall investigation, the FBI forwarded the USPO several images of the unidentified suspect from the May 2, 2022, TD Bank robbery and one image of the unidentified subject from the May 20, 2022, People's United back robbery. The USPO informed the FBI that the individual depicted in the TD Bank images appeared to have the same overall appearance and distinct blonde hair style as SHABAZZ, a/k/a Tucker. The USPO was unable to identify the suspect in the People's United Bank robbery photo.

15. In connection with this overall investigation, FBI located a Facebook account for SHABAZZ, a/k/a Tucker, under the profile name of Lonnie Ali. The Facebook profile link is

² On May 20, 2022, People's United Bank, a FDIC insured bank, located at 800 Boylston Street in Boston was robbed of \$8,994. The unknown robber was described to authorities as a black male, approximately 5'8"-10" in height, wearing a black durag. The note used in that robbery was not recovered, however, the teller recalled the note stated it was a robbery. The teller also stated to authorities that the robber sounded nice. During that robbery, the bank robber discovered the GPS tracking device and returned it to the victim teller before leaving the bank with the stolen money. On or about May 26, 2022 and on or about June 1, 2022, the FBI presented a photographic array to two employees of People's United Bank who were present in the bank during that robbery. SHABAZZ's, a/k/a Tucker's, photograph was contained in the array. Neither witness was able to identify SHABAZZ, a/k/a Tucker, from the array. Further, one employee did not feel as though the robber's photograph was in the array of photographs and the other employee did not believe the robber had tattoos on his neck.

<https://www.facebook.com/jalonni.shabazz>. The Facebook account contains several images of SHABAZZ, a/k/a Tucker, including a photo of him that depicts a left arm bicep tattoo, with blond hair, as well as an article of clothing worn by SHABAZZ, a/k/a Tucker, on Facebook photos, that appear to be similar to the clothing worn by the suspect of the TD Bank robbery on May 2, 2022. The article of clothing was a camouflage garment worn around the bank robbery suspect's neck. Below are TD Bank video surveillance images of the suspect of the May 2, 2022 bank robbery, which include the suspect's bicep tattoo. Below are also images of SHABAZZ's, a/k/a Tucker's, bicep tattoo which are depicted in his Facebook profile account. Also, the image of SHABAZZ, a/k/a Tucker, that is depicted on his Facebook profile show his blond hair style which appears to be the same or similar to that of the suspect of the bank robbery that is depicted on CEDC video just after the May 2, 2022, robbery.³ Please note the images below have been edited by FBI personnel to accentuate the similar hairstyle and the matching tattoo:

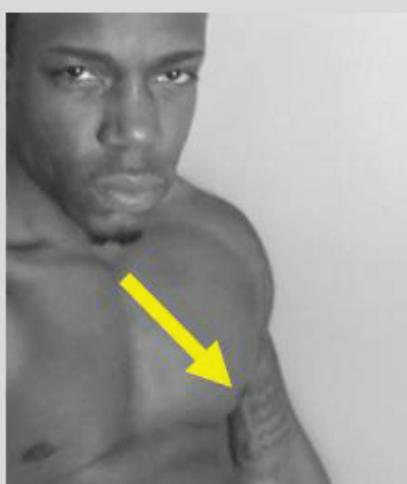
³ Note: SHABAZZ, a/k/a Tucker, was arrested on May 26, 2022, on a violation of supervised release warrant and at his arrest, did not have the same color hair as was depicted in the TD Bank Robbery or Facebook images of SHABAZZ, a/k/a Tucker.

UNCLASSIFIED

(U) Comparison of Left Inner Bicep Tattoo



(U) Source: Cambridge Police Department



(U) Source: Facebook Profile

UNCLASSIFIED

(U) Comparison of Hair Color



(U) Source: Cambridge Police Department



Lonnie Ali
April 16 ·
I'm carrying a bag, but I'm coming for yours!



(U) Source: Facebook Profile

CONCLUSION

Based on the foregoing, I submit there is probable cause to believe that on or about May 2, 2022, SHABAZZ, a/k/a Tucker, committed a bank robbery of the TD Bank in Cambridge, Massachusetts, in violation of 18 U.S.C. § 2113(a).

Respectfully submitted,

Mark E O'Brien

Mark E. O'Brien
Massachusetts State Police
Task Force Officer Federal Bureau of Investigation

Sworn to before me telephonically pursuant to Fed. R. Crim. P. 4.1 this 15th day of July, 2022.



11:58 a.m.