

UNITED STATES DISTRICT COURT

for the

Middle District of Tennessee

United States of America

v.

WILLIE WHITE
ELIJAH DIAZ
TROY PARKER
ABRAHAM WOODS

Case No. 21-mj-4070

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 April 23-26, 2021 in the county of Wilson in the
Middle District of Tennessee, the defendant(s) violated:*Code Section**Offense Description*Title 18, United States Code
Section 2113(b)

Bank Larceny

Title 18, United States Code
Section 371

Conspiracy to Commit Bank Larceny

This criminal complaint is based on these facts:

See attached statement in support of complaint.

☒ Continued on the attached sheet.HAYWORTH.JOEL.G.C91E66P98
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Digitally signed by
HAYWORTH.JOEL.G.C91E66P98
Date: 2021.04.27 09:08:04 -05'00'*Complainant's signature*

S/A Joel Hayworth, FBI

*Printed name and title*Sworn to me remotely by telephone, in compliance with
Fed. R. Crim. P. 4.1.Date: 04/27/2021City and state: Nashville, Tennessee*Judge's signature*

Hon. Alistair E. Newbern, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF PROBABLE CAUSE

I, Joel Gregory Hayworth, upon being sworn under oath, state the following:

1. I am a Special Agent with Federal Bureau of Investigation (“FBI”) Violent Crime Task Force. As an FBI Special Agent, I am charged with the duty of investigating violations of the United States Code and collecting evidence in matters in which the United States is or may be a party of interest. As a member of the Violent Crimes Task Force, I am currently charged with investigating violent crimes, which includes violations of 18 U.S.C. § 2113(b), the offense of Bank Larceny.

2. I make this statement, in part, on personal knowledge based on my direct participation in this investigation, and, in part, upon information learned during the course of this investigation from other sources. I am familiar with the facts and circumstances of this matter and the assertions made in this affidavit are based on first-hand knowledge or information received during the course of the investigation. Unless otherwise noted, the referenced information was provided by a person who may have direct or hearsay knowledge of the statement. Except where indicated, all statements referred to below are set forth in substance and in part, rather than verbatim.

3. This affidavit is submitted in support of a Criminal Complaint for the arrest of Willie WHITE, Elijah DIAZ, Troy PARKER, and Abraham WOODS for the offense of Bank Larceny in violation of Title 18 United States Code, Section 2113(b) and Conspiracy to Commit Bank Larceny in violation of Title 18, United States Code, Section 371.

Background – ATM Larceny Investigation

4. I have been investigating multiple Automated Teller Machine (ATM) larcenies in the Middle District of Tennessee for over a year. Based on my training, and experience, as well as

information I have learned during the course of my investigation into these ATM larcenies, I (along with other investigators) have identified the *modus operandi* of these theft crews which has been shown in multiple ATM larcenies both in the Middle District of Tennessee and elsewhere. Prior to committing an ATM theft (sometimes days in advance), the suspects steal an F-250 style pickup truck (or similar large vehicle). The suspects then obtain large J-hooks and “one pull” large industrial chains by purchasing them from wrecker supply stores or specialty hardware stores like Harbor Freight or Northern Tool. The suspects then scout a stand-alone FDIC insured bank ATM and wait until the early morning hours to approach the ATM in the stolen truck. Suspects wearing hoodies and masks then exit the stolen truck and approach the ATM on foot. The suspects then pry open a section of the ATM regularly called the “beauty hatch” or “shell”, giving the suspects access to the ATM’s internal safe. The suspects then attach the J-hooks to the safe and chain the J-hooks to the stolen truck. The suspects then use the truck to pull open the ATM safe door giving the suspects access to the U.S. currency inside. The suspects take the money from the ATM and leave the location in the stolen truck. They then travel to a nearby, pre-determined location where they off-load the stolen currency into other vehicles (commonly described as “switch vehicles” or “switch cars”) and abandon the stolen truck in an effort to avoid detection and apprehension.

5. Members of the Criminal Apprehension Team in Houston, Texas have investigated multiple bank larcenies where similar techniques were used over the last several years. Those investigators have learned that the majority of the suspects in the ATM larcenies using these techniques reside in the Northeast region of Houston/Harris County, Texas and travel to neighboring cities and states to commit these crimes. Investigators believe that the suspects travel outside the Houston area to commit these thefts in order to minimize the risk of being apprehended locally.

6. During my investigation, I came to know FBI Task Force Officer (TFO) Chris LeVrier also of the Houston Police Department. TFO LeVrier is currently assigned to the Major Offenders, Criminal Apprehension Team. TFO LeVrier is assigned to investigate a group who is actively committing ATM larcenies in and around Houston, Texas.

April 6, 2021 ATM Larceny at Wilson Bank & Trust in Murfreesboro, Tennessee

7. On April 6, 2021, I advised TFO LeVrier of an ATM larceny which occurred around 1:14 A.M. on April 4, 2021 at a Wilson Bank & Trust branch located at 3110 Memorial Boulevard in Murfreesboro, Tennessee, which is within the Middle District of Tennessee. The ATM larceny was captured on video surveillance, which I have reviewed. The video surveillance shows that, at the time of the ATM larceny, two Black male suspects wearing ski masks and dark clothing arrived at the bank in a Chevrolet 2500 pickup truck. Investigators later determined that truck had been stolen earlier on the evening April 3, 2021 in the nearby town of LaVergne, Tennessee. The two suspects can be seen on video exiting the pickup truck and prying open the “shell” or “beauty hatch” of the ATM. Once the “shell” was open, the suspects then attached hooks to the ATM’s internal safe and chained the hooks to the stolen pickup truck. The suspects then used the pickup truck to force open the safe of the ATM. The suspects then stole approximately \$90,000.00 in cash and fled the location.

Follow-On Investigation in Tennessee

8. A review of the bank’s surveillance footage from the 12 hours before the ATM larceny showed a 2015 black Dodge Durango with a Texas temporary license plate number 01590R8. The black Dodge Durango appeared to be driving by and loitering near the ATM for no immediately discernable legitimate purpose. Based on my experience and training, I know that individuals who intend to commit bank larceny will often go to the bank they intend to steal from

prior to the theft; this is known as “casing” the scene. Based on my review of the surveillance footage and my training and experience, I submit that the black Dodge Durango was “casing” the ATM location in preparation for the larceny that was committed later that night. Still photographs from the surveillance are included below:



9. The black Dodge Durango’s license tag was run through law enforcement data bases and it was determined that Willie WHITE was the vehicle’s registered owner. The driver of the black Dodge Durango can be seen on the surveillance footage when the car was “casing” the ATM location. TFO LeVrier also reviewed the above surveillance images of the suspect “casing”

the ATM and recognized WHITE as the driver of the black Dodge Durango on that occasion. TFO LeVrier and has been investigating WHITE for multiple ATM burglaries in Texas and is well familiar with his appearance.

10. Investigators later learned that Murfreesboro Police Department (MPD) conducted a traffic stop of the black Dodge Durango on Friday, April 2, 2021. The driver was unable to produce identification, but verbally identified himself as Elijah DIAZ from Houston, Texas. The passenger of the vehicle identified himself as Troy PARKER from Houston, Texas. DIAZ told officers that the Durango belonged to “Willie.” During the search, MPD Officers located crowbars and chains in the rear of the vehicle. Images from the traffic stop are attached below:



Background and Arrest on WHITE

11. On June 29, 2020, as part of an investigation into WHITE for ATM larcenies in Texas, TFO LeVrier learned that WHITE was traveling in a gray Hyundai Tucson which had been rented by WHITE's sister, Chauntel White. TFO LeVrier identified WHITE to be in this vehicle

in the Southern California area based on images obtained from WHITE's Instagram account. TFO LeVrier put out a request for the vehicle to be stopped as it was traveling back into the Harris County, Texas area. A traffic stop was conducted on the gray Hyundai Tucson outside of Houston, Texas. WHITE was the driver of the vehicle. Investigators discovered hooks, chains and crowbars located in the vehicle.

12. WHITE was arrested on May 6, 2020, along with three other individuals, in Oklahoma City, Oklahoma by Oklahoma City Police Department (OCPD) Officers for Burglary 2nd Degree, Unauthorized Use of a Vehicle, and Conspiracy to Commit a Felony. OCPD Officers later provided *Miranda* Warnings to WHITE who agreed to speak with the officers. WHITE told the officers that he caused damage to an ATM machine with a crowbar and utilized a truck with a chain to force the front of the ATM door open. WHITE advised he stole the money from the ATM and took it to his vehicle, a Chevrolet Cruz. WHITE further advised he learned how to break open ATM machines by watching instructional videos on YouTube. It is my understanding that those charges are still pending and that WHITE is on some form of bond or pre-trial release for those offenses.

Follow-On Investigation in Houston, Texas

13. After being advised of the ATM larceny in Murfreesboro and the presence of the black Dodge Durango being used by WHITE to "case" the location prior to the larceny, TFO LeVrier located the Dodge Durango parked at WHITE's residence in Houston, Texas on April 7, 2021. TFO LeVrier and his team began keeping surveillance on the Durango. In April, TFO LeVrier observed the vehicle stop at 7701 Sherman St and Elijah DIAZ was observed driving the Durango.

14. TFO LeVrier informed me that, based on his surveillance of the vehicle and on April 24, 2021, around 10:15 P.M., the Dodge Durango registered to WHITE began traveling east on Interstate I-10, leaving Texas and crossing into Louisiana around 1:00 A.M. on April 25, 2021. As noted earlier, TFO LeVrier monitors WHITE's Instagram where WHITE uses Instagram handle "6.0dank". On April 25, 2021, WHITE posted on his Instagram page pictures of him traveling in a silver Infiniti Q50 sedan.

15. TFO LeVrier then observed that WHITE posted pictures on his Instagram account around 6:00 P.M. on April 25th, 2021 which appeared to be taken from inside a hotel lobby. The images appeared to be taken from inside of the Westin Hotel in downtown Nashville, Tennessee.

Surveillance on April 25, 2021

16. TFO LeVrier then contacted me and advised that WHITE and possibly other associates were in the Nashville area in preparations for an ATM larceny. TFO LeVrier further advised they group were likely using the black Dodge Durango (previously used in the April 4, 2021 ATM larceny), and possibly a silver Infinity Q50. Investigators then went to the Westin Hotel located at 807 Clark Place, Nashville, Tennessee, where the suspects were believed to be staying. Investigators confirmed with staff members at the Westin that WHITE checked in during the early evening of April 25, 2021. Staff members advised WHITE reserved two rooms for four people. Hotel staff also confirmed that WHITE and the other three individuals in his party arrived in a black Dodge Durango and a light-colored Infiniti. Investigators located a silver Infiniti Q50S with Texas temporary license plate number 10490V3 at the Westin parking garage. TFO LeVrier confirmed the Infiniti is registered to WHITE.

17. While conducting surveillance on the Westin Hotel, investigators observed four individuals, two of whom matched the description of WHITE and Elijah DIAZ waiting on the

street corner near the Westin Hotel at approximately 7:30 P.M. Westin employees later advised investigators that WHITE and the other three individuals in his party requested WHITE's black Dodge Durango from the valet, entered the Durango, and drove off.

April 26, 2021 ATM Larceny at Wilson Bank & Trust in Mount Juliet, Tennessee

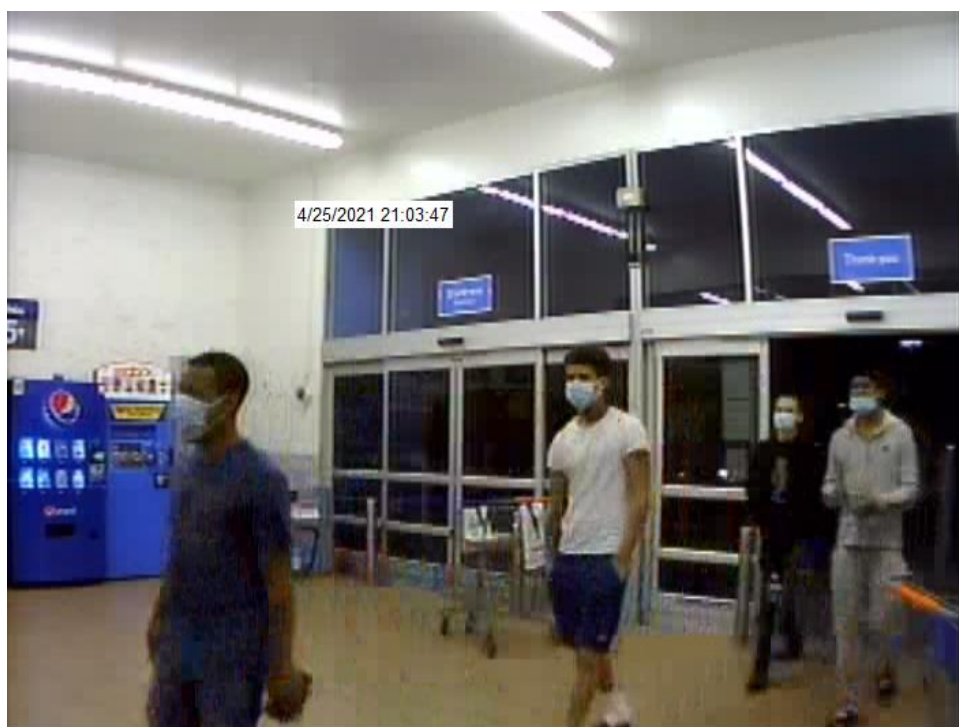
18. At approximately 2:27 A.M., on April 26, 2021, an ATM larceny was committed at a Wilson Bank & Trust branch located at 709 South Mt. Juliet Road in Mount Juliet, Tennessee and approximately \$100,020.00 in U.S. currency was stolen. The Wilson Bank and Trust surveillance cameras captured the bank larceny. An individual in a grey hooded sweatshirt can be seen running toward the ATM with what appears to be a red-handled crowbar. The individual pried open the ATM top as another individual positioned a stolen silver pickup truck. The driver of the stolen pickup jumped out of the vehicle, placed tow hooks attached to the stolen truck on the ATM, then drove forward at a high rate of speed to rip open the ATM's internal safe. The driver then parked the stolen truck and ran back to the ATM to take the cash. The driver and passenger both fled to the stolen truck with the cash. I have included still images from the Wilson Bank & Trust surveillance video below:

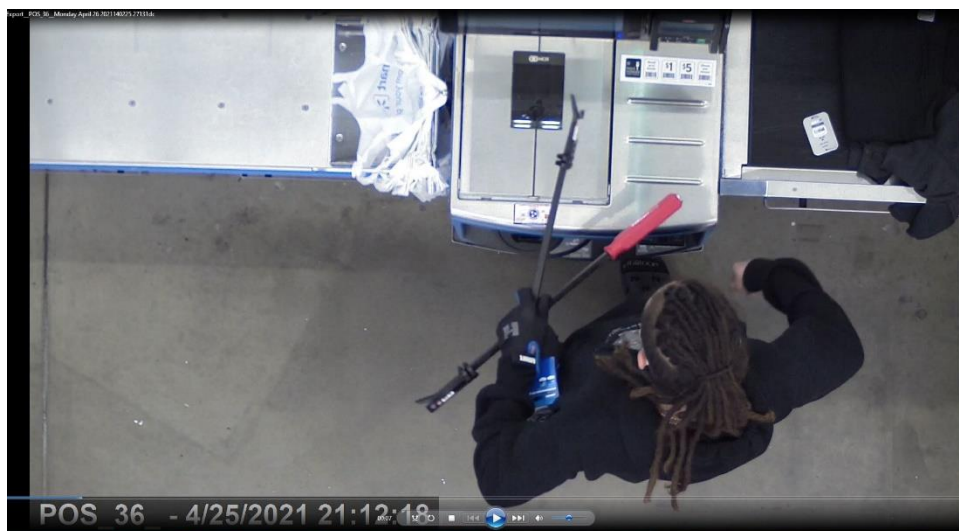




Follow-On Investigation

19. On the morning of April 26, 2021, I reached out to loss prevention employees at Walmart regarding any recent purchases of crowbars in the Mount Juliet area. I was advised that four individuals, matching the descriptions of individuals later identified as WHITE, DIAZ, PARKER, and Abraham WOODS, exited a black SUV (consistent with a Dodge Durango), and entered the Walmart on 300 Pleasant Grove Road in Mount Juliet, Tennessee at approximately 9:03pm on April 25, 2021. Surveillance cameras captured purchases made by the individuals shortly thereafter. An individual who appears to be DIAZ purchased two red-handled crowbars which are consistent with the crowbar that can be observed on the surveillance footage of the Wilson Bank & Trust ATM larceny. The Walmart at 300 Pleasant Grove Road in Mount Juliet is approximately 1.6 miles away from the Wilson Bank & Trust branch where the ATM larceny was committed. I have included still images from the Walmart surveillance below:





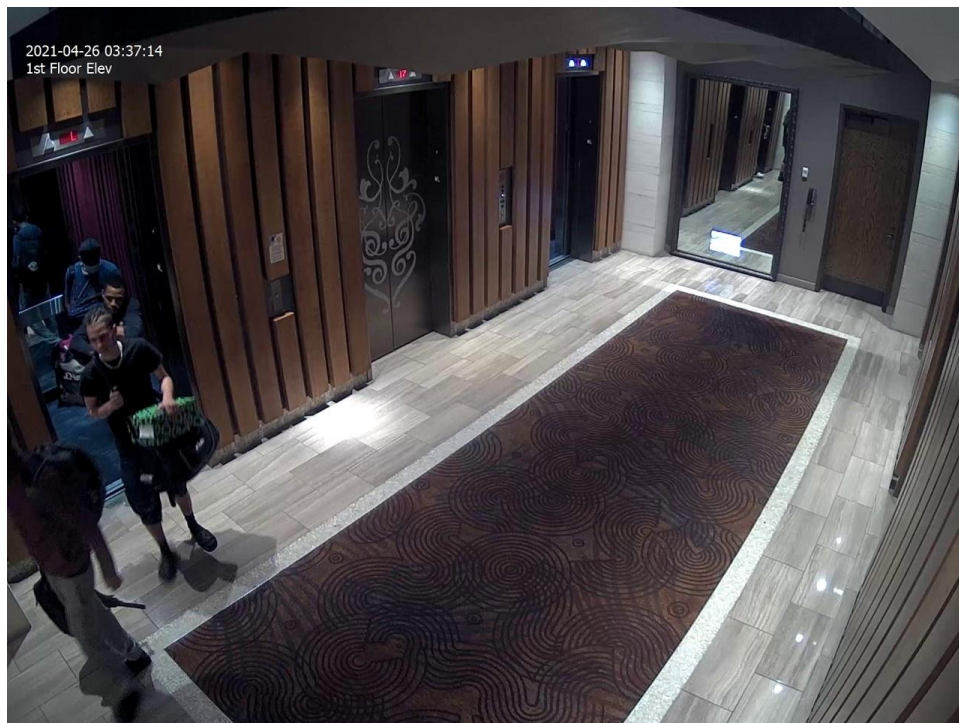
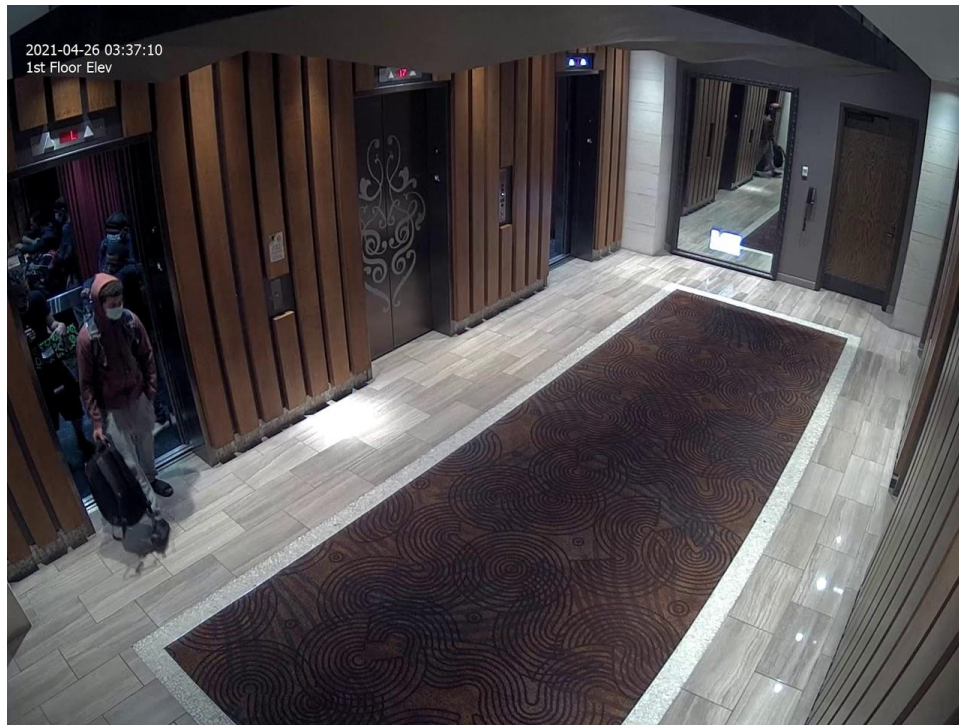
20. Investigators obtained still images and video from the Westin Hotel of four individuals that appear to be WHITE, DIAZ, PARKER, and WOODS returning to the Westin at approximately 2:55 A.M. on April 26, 2021, in what appears to be the silver Infiniti Q50S and the black Dodge Durango. I have included still images from the Westin Hotel surveillance video below:

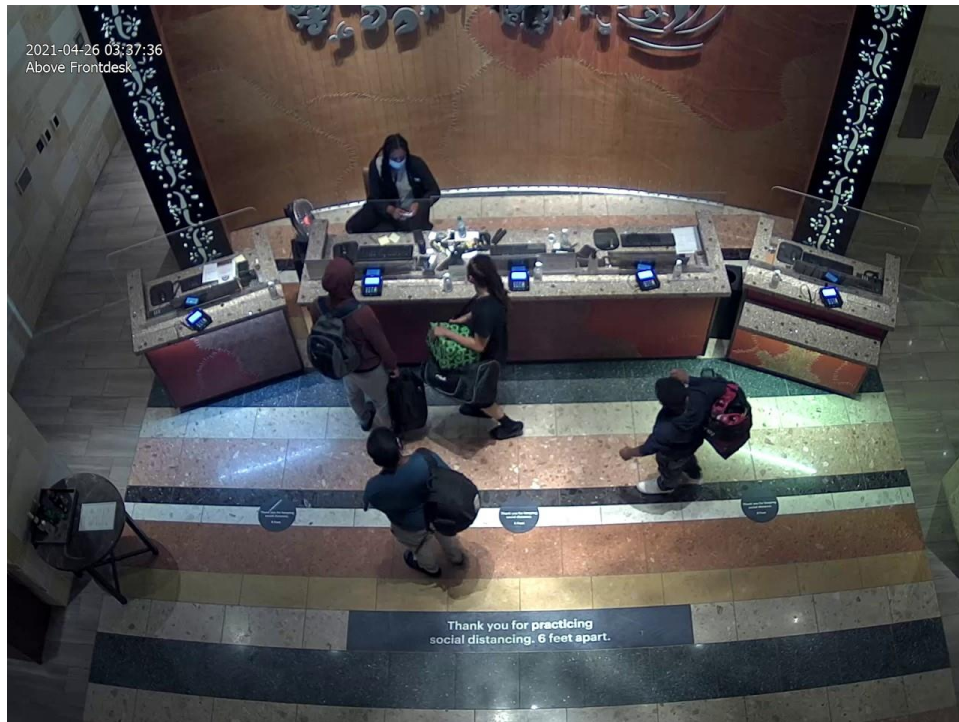




21. Investigators obtained still images and video from the Westin Hotel of four individuals that appear to be WHITE, DIAZ, PARKER, and WOODS departing the hotel at

approximately 3:40 A.M. I have included still images from the Westin Hotel surveillance video below:





22. Investigators canvassed the area surrounding the Wilson Bank & Trust in Mount Juliet and made contact with management at the Publix grocery store located at 665 South Mount Juliet Road. Publix management provided video surveillance footage for review. At approximately 2:00 A.M. on April 26, 2021, a silver Infinity can be seen driving from the area of the Wilson Bank & Trust, down the side of the Publix building, back past the receiving dock and out of camera view. Investigators reviewing the Publix surveillance recognized the vehicle as the one they observed at the Westin Hotel in Nashville on April 25, 2021. At approximately 2:17 A.M., headlights can be seen in the area of the bank, where the ATM is located. The surveillance video shows a light-colored, full-size truck, leave the area and follow the same path as the Infinity, down the side of the parking lot and building, around back past the receiving dock and out of camera view. Chains can be seen being dragged behind the truck.

23. On the morning of April 26, 2021, Mount Juliet Police Department (MJPd) and Wilson County Deputies located the truck used in the ATM larceny on a greenway path. The

truck, was later determined to have been stolen in Nashville, contained several of the money cartridges known to be used in ATMs, as well as several \$20 bills scattered on the ground. Further inspection of the truck revealed two crowbars with red handles, consistent with the crowbars used at the ATM larceny on April 26, 2021 and the ones purchased by DIAZ on April 25, 2021. I have included photos from the recovered truck which depict the crowbars and money cartridges below:





24. Security from Wilson Bank & Trust provided investigators with surveillance video and still images from that video which showed that, at approximately 9:35 P.M., a dark colored SUV that appears to be a black Dodge Durango drove slowly by the bank. Based on my training and experience, I submit that the black SUV was “casing” the scene of the later ATM larceny. I have included still images from the Wilson Bank & Trust surveillance video below:





Arrest of WHITE, DIAZ, PARKER and WOODS

25. TFO LeVrier notified me and other investigators that he had located WHITE's Dodge Durango at a Days Inn hotel in Holladay, Tennessee on the morning of April 26, 2021.

26. Investigators then drove to the Days Inn hotel located at 13845 Highway 641 North in Holladay, Tennessee and observed WHITE's black Dodge Durango and silver Infiniti parked next to each other, backed in, at the parking lot. Investigators then observed WHITE, DIAZ, PARKER, and WOODS walking towards the two vehicles. Investigators then immediately activated the emergency equipment in their vehicles and positioned their vehicles to block the Durango and Infiniti. Upon announcing their identities and giving verbal commands for all four individuals to get on the ground, PARKER ran south, away from the hotel and law enforcement and towards the woods. Law enforcement officers arrested PARKER and moved him back to the hotel.

27. Investigators then searched WHITE, DIAZ, PARKER, and WOODS incident to their arrest and conducted a probable cause search of the two vehicles for being used in connection with the ATM larceny at Wilson Bank & Trust in Mount Juliet, Tennessee. Investigators recovered \$88,410 in United States currency hidden in multiple backpacks and in the trunk of the Infiniti.

28. Based on all the foregoing I submit that there is probable cause to arrest WHITE, DIAZ, PARKER, and WOODS for Bank Larceny in violation of 18 U.S.C. § 2113(b) and Conspiracy to Commit Bank Larceny in violation of 18 U.S.C. § 371.