

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

KENDALL JONES

CASE NUMBER: 24 CR 199

**FILED**  
**4/24/2024**  
THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

**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 April 23, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant violated:

*Code Section*

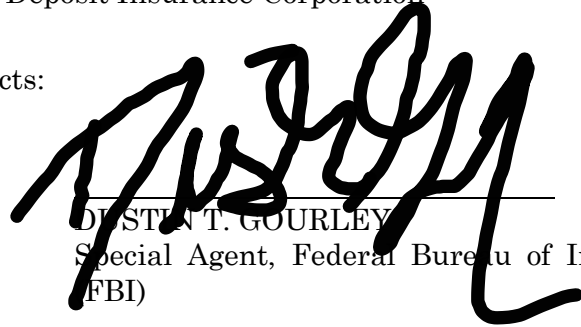
Title 18, United States Code, Section 2113(a)

*Offense Description*

by intimidation, did take from the person and presence of a bank employee United States currency belonging to and in the care, custody, control, management, and possession of Chase Bank, located at 10 South Dearborn Street, Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation

This criminal complaint is based upon these facts:

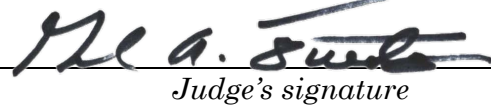
X Continued on the attached sheet.



DUSTIN T. GOURLEY  
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: April 24, 2024

  
*Judge's signature*

City and state: Chicago, Illinois

GABRIEL A. FUENTES, U.S. Magistrate Judge  
*Printed name and title*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**AFFIDAVIT**

I, DUSTIN T. GOURLEY, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since approximately April 2012. My current responsibilities include the investigation of violent crimes, including, among others, kidnaping, bank robbery, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that KENDALL JONES has violated Title 18, United States Code, Section 2113(a).

3. The statements in this affidavit are based on multiple sources, including but not limited to: my personal knowledge; my review of reports and documents related to this investigation; my review of video recordings related to this investigation; conversations with others who have knowledge of the events and circumstances described in this affidavit; my review of law enforcement databases; my training and experience and the training and experience of other agents with whom I work; and information provided to me by persons with knowledge regarding relevant facts.

4. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe establish probable cause to believe that KENDALL JONES has

committed a bank robbery.

### **PROBABLE CAUSE**

5. In summary, and as set forth in more detail below, on April 23, 2024, JONES used a threatening note to steal \$500 from the Chase Bank, located at 10 South Dearborn Street in Chicago, Illinois. Just minutes later, in close proximity to the bank, JONES was arrested in possession of the \$500 taken from the bank and additional threatening notes.

#### **A. Bank Robbery**

6. According to Chicago Police Department records and footage, an interview with the teller victim, interviews with security guards, and bank surveillance footage, an African-American male (“Offender”) robbed a Chase Bank branch located inside the lobby of a building located at 10 South Dearborn Street, in Chicago, Illinois, on April 23, 2024, at approximately 10:15 a.m.

7. Specifically, according to Victim Teller A, during the morning of April 23, 2024, an African-American male (“Offender”) approached the teller counter and inquired about opening a new account. Victim Teller A provided information to the Offender regarding the process for opening a new account. According to Victim Teller A, the Offender then passed Victim Teller A a note while asking something to the effect of “if this will suffice as an ID.” Victim Teller A read the first line of the note, which said, in summary, that she needed to give the Offender \$2000. According to Victim Teller A, at this point she stopped reading the note and told the Offender that she would need to press two buttons to access her cash drawer. She then pressed the

two buttons, received \$500,<sup>1</sup> and passed the money to the Offender. The Offender then took the \$500 and exited the bank, leaving the demand note behind on the teller counter.

8. Chase Bank personnel provided a still image of the Offender in front of Victim Teller A's teller counter from the bank's surveillance video, depicted below:



9. The timestamp on the surveillance video still image indicates that the

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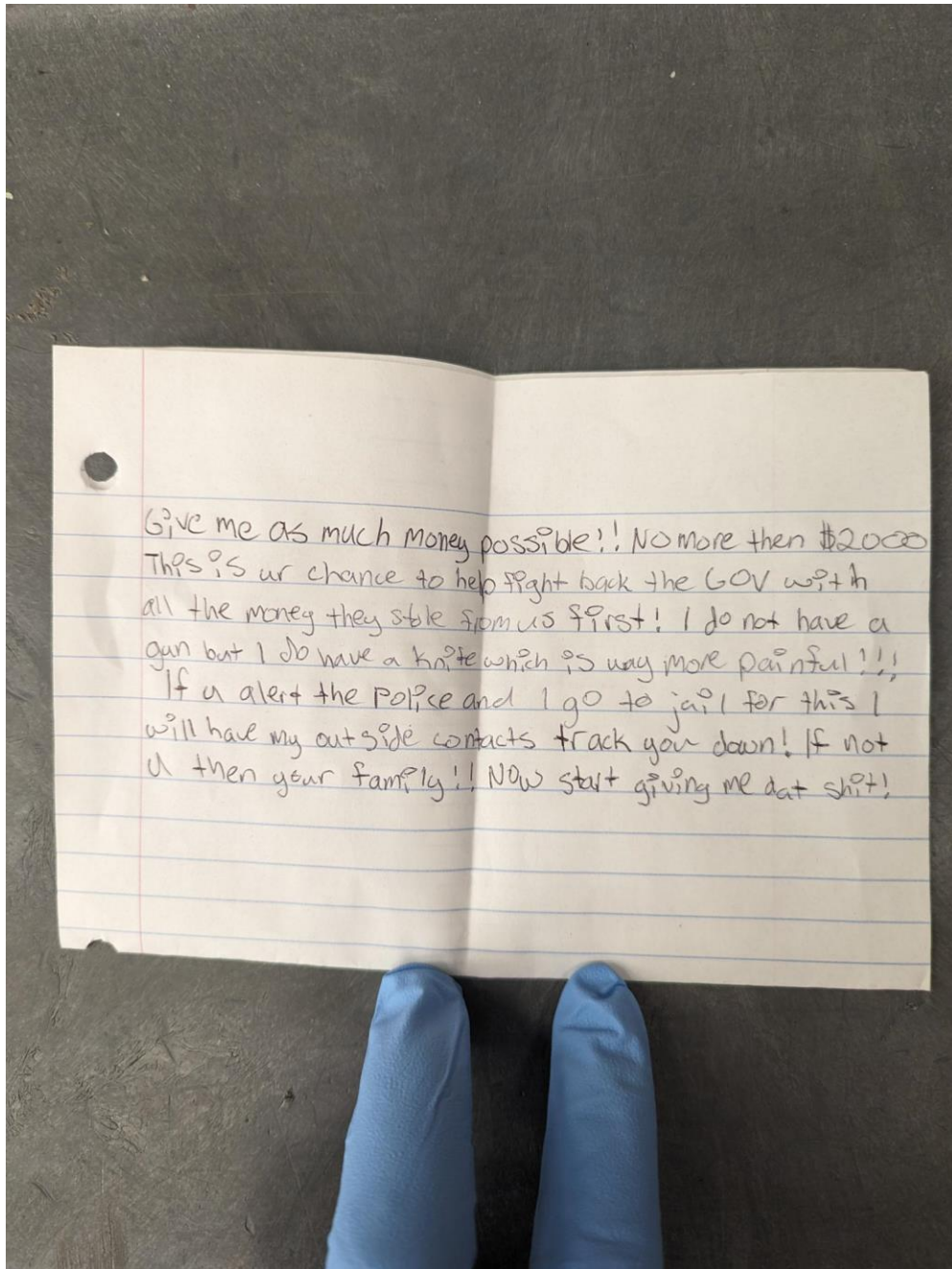
<sup>1</sup> According to Victim-Teller A, her cash drawer was configured such that pressing these two buttons would cause the drawer to automatically dispense exactly \$500.

robbery took place at approximately 10:15 a.m.

10. Law enforcement officers recovered the demand note left behind by the Offender on the teller counter, which reads:

Give me as much money possible!! No more then \$2000. This is ur chance to help fight back the Gov with all the money they stole from us first! I do not have a gun but I do have a knife which is way more painful!!! If u alert the police and I go to jail for this I will have my outside contacts track you down! If not u then your family!! Now start giving me dat shit!

The note is depicted below:



11. According to an audit by Chase Bank, the Offender stole approximately \$500 from the bank, consisting of two \$100 bills, four \$50 bills, four \$20 bills, one \$10 bill, and two \$5 bills.

12. According to the Federal Deposit Insurance Corporation's website, the deposits of Chase Bank were insured by the Federal Deposit Insurance Corporation

at the time of the robbery.

**B. Arrest and Identification of KENDALL JONES**

13. According to Security Guard A,<sup>2</sup> Security Guard A was working as an armed security guard in the lobby of the building at 10 South Dearborn in Chicago, Illinois, on the morning of April 23, 2024. Security Guard A recalled observing the Offender enter the building that morning and then enter the Chase Bank. Security Guard A described the Offender as an African-American male, medium complexion, medium afro-style hair, wearing black clothing/shoes.

14. A short time later, Security Guard A was notified by Security Guard C that a bank robbery had just occurred and was provided a brief description of the robber which matched the description of the Offender. Security Guard A recalled exiting the building and chasing after the Offender. Security Guard A recalled initially seeing the Offender moving eastbound on Madison Street on foot, away from the Chase Bank, before losing sight of the Offender. Security Guard A then heard Security Guard B yell something to the effect of “There he go!” Security Guard A then observed the Offender enter the building at 70 West Madison Street.

15. Security Guard A recalled chasing the Offender into 70 West Madison Street, and observing the Offender jump the turnstiles, utilize the escalator, and attempt to access the elevator. Security Guard A recalled that he was able to detain the Offender at this point by putting him in handcuffs. Security Guard A further recalled bringing the Offender out of the building at 70 West Madison Street, across

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<sup>2</sup> Security Guard A is a Chicago Police officer who was off-duty at the time of the robbery.

the street, and back into the building at 10 South Dearborn.

16. According to Security Guard B, Security Guard B was working as an armed security guard in the lobby of the building marked 10 South Dearborn Street on the morning of April 23, 2024. Security Guard B explained that, on the morning of April 23, 2024, Security Guard B observed the Offender enter the building via the Dearborn Street side. Security Guard B described the Offender as an African-American male with medium sized afro-style hair, and black clothing. Security Guard B recalled observing the Offender walking around the lobby and attempting to use the escalators. Security Guard B recalled observing this individual speaking with the concierge, and that the Offender then walked into the Chase Bank.

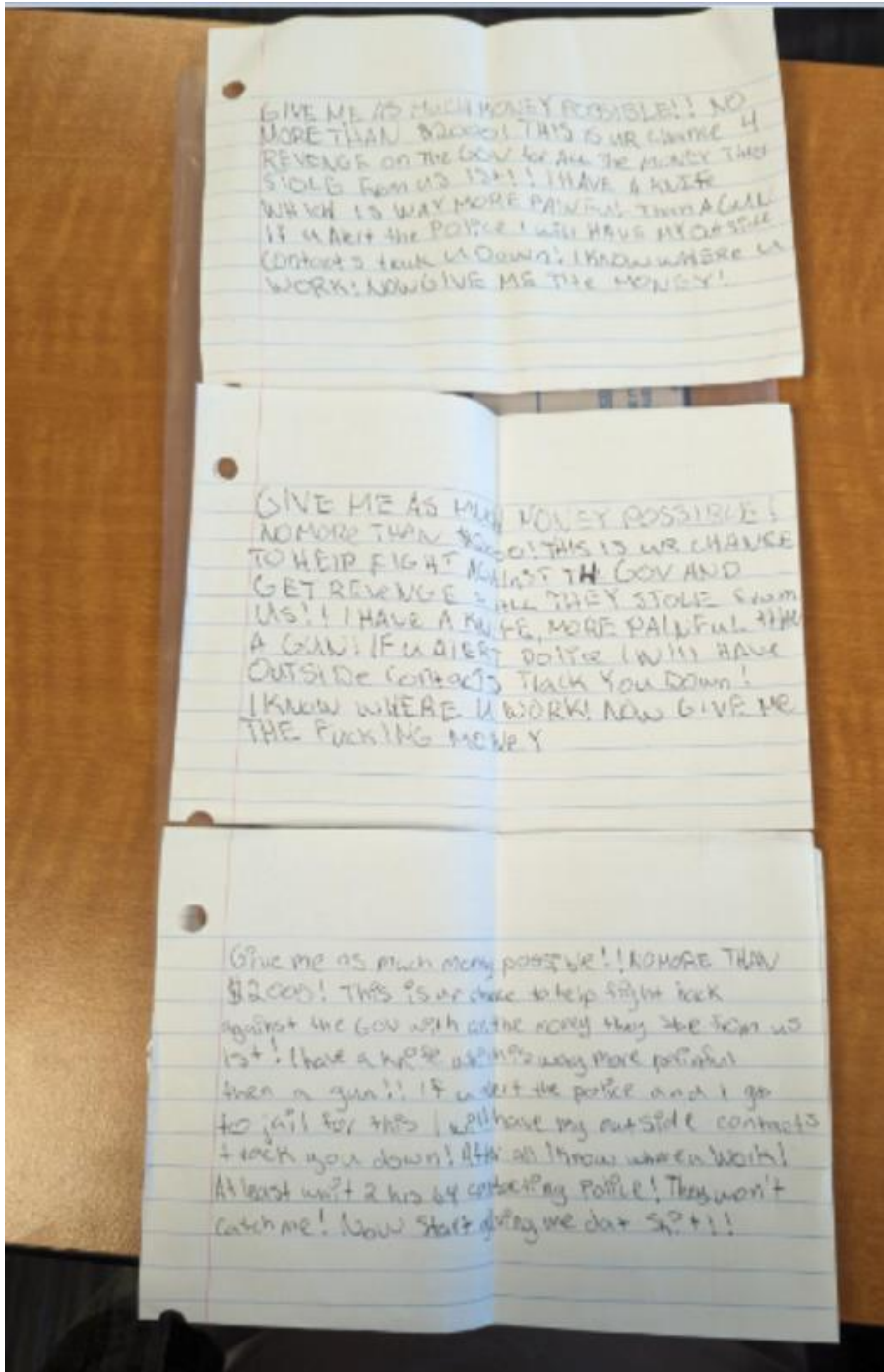
17. Security Guard B recalled shortly thereafter being notified of a bank robbery by Security Guard C, and being provided a description that generally matched the Offender. Security Guard B then exited the building in an effort to locate the Offender. Security Guard B recalled observing the Offender exit the building marked 70 West Madison Street, at which point Security Guard B yelled something to the effect of "that's him!" Security Guard B recalled observing that the Offender looked at Security Guard B and froze, then re-entered 70 West Madison Street.

18. According to Security Guard C, on April 23, 2024, Security Guard C was working as an unarmed security guard at the Chase Bank branch, located within the building at 10 South Dearborn Street. Security Guard C recalled walking around the bank on the morning of April 23, 2024, and observing the Offender inside the Bank. Security-Guard C described the Offender as an African-American male, 5'6, slim,



medium afro, who looked young and did not have a mask. Security-Guard C explained that as soon as the Offender exited the bank via the Madison Avenue side, bank personnel notified Security Guard C that the bank was just robbed. Security Guard C notified Security Guard A and Security Guard B that the bank was just robbed.

19. According to Chicago Police Department reports, CPD received a call of a robbery at Chase Bank, located at 10 South Dearborn Street in Chicago, on the morning of April 23, 2024. Upon arrival, CPD personnel spoke with security guards who had taken the Offender, subsequently identified as KENDALL JONES, into custody minutes after the robbery. JONES had on his person three demand notes, and \$500 in United States Currency, in the same denominations as described in the bank audit. The three demand notes used similar wording to the demand note left at the Chase Bank by the Offender and are pictured below:



20. JONES provided law enforcement the name of KENDALL JONES.

21. At the time of his arrest, JONES was wearing a black hooded sweatshirt with a white logo, consistent with what the offender is seen wearing in the still image from the bank surveillance video above. A booking photo of JONES is below:



**C. Background on KENDALL JONES**

22. A query of the Illinois Secretary of State's records revealed that JONES had a state ID issued on February 4, 2024. JONES was listed as 5'7, 120 lbs. A photograph of JONES is below:



**D. Review of City of Chicago POD Cameras**

23. I reviewed City of Chicago POD cameras associated with the bank robbery that occurred on April 23, 2024, including the POD camera located near the intersection of West Madison Street and South Dearborn Street, which captures the building at 10 South Dearborn Street.

24. The footage depicts an individual who appears to be JONES walking on Madison Street. According to the footage, at approximately 10:11 a.m., the individual who appears to be JONES entered the building marked 10 South Dearborn Street, via the Dearborn Street entrance.

25. As seen in the footage, at approximately 10:16 a.m., the individual who appears to be JONES exited the building marked 10 South Dearborn Street via the Madison Street entrance, and walked across the street in the general direction of 70

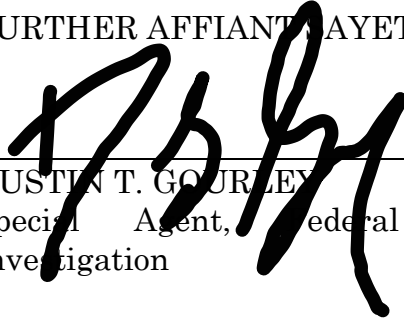
West Madison Street. The footage then shows multiple security guards exit the building marked 10 South Dearborn Street. As seen in the footage, one of the guards points in the direction of 70 West Madison Street, and multiple guards then run in that direction.

26. At approximately 10:21 a.m., the footage depicts the security guards escorting JONES back into 10 South Dearborn Street, from the area of 70 West Madison Street.

### CONCLUSION

27. For all the reasons described above, I respectfully submit that there is probable cause to believe that KENDALL JONES has committed the offense of bank robbery, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT.

  
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DUSTIN T. GOURLEY  
Special Agent, Federal Bureau of  
Investigation

SWORN TO AND AFFIRMED by telephone April 24, 2024.

  
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Honorable GABRIEL A. FUENTES  
United States Magistrate Judge