

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

NAENB MER SHAH

CASE NUMBER: 24 CP 510

FILED
11/25/2024
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 November 19, 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, took from the person or presence of a bank employee approximately \$2,545 in United States currency belonging to, and in the care, custody, control, management, and possession of, Chase Bank, located at 5715 North Broadway in 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.



JOSEPH EDGAR LEE THOMAS
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: November 25, 2024



Judge's signature

City and state: Chicago, Illinois

KERI L. HOLLEB HOTALING, U.S. Magistrate
Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, JOSEPH EDGAR LEE THOMAS, being duly sworn, state as follows:

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

2. This affidavit is submitted in support of a criminal complaint alleging that Naenb Mer Shah 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 MERSHAH with bank robbery, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge derived from my own investigation, including my review of surveillance footage and other evidence, information provided to me by other law enforcement agents including Chicago Police Department (“CPD”) officers, FBI Special Agents, and FBI Task Force Officers, information provided by persons with knowledge of the offense, my training and experience, and the experience of other law enforcement agents.

I. FACTS SUPPORTING PROBABLE CAUSE

A. Summary of Probable Cause

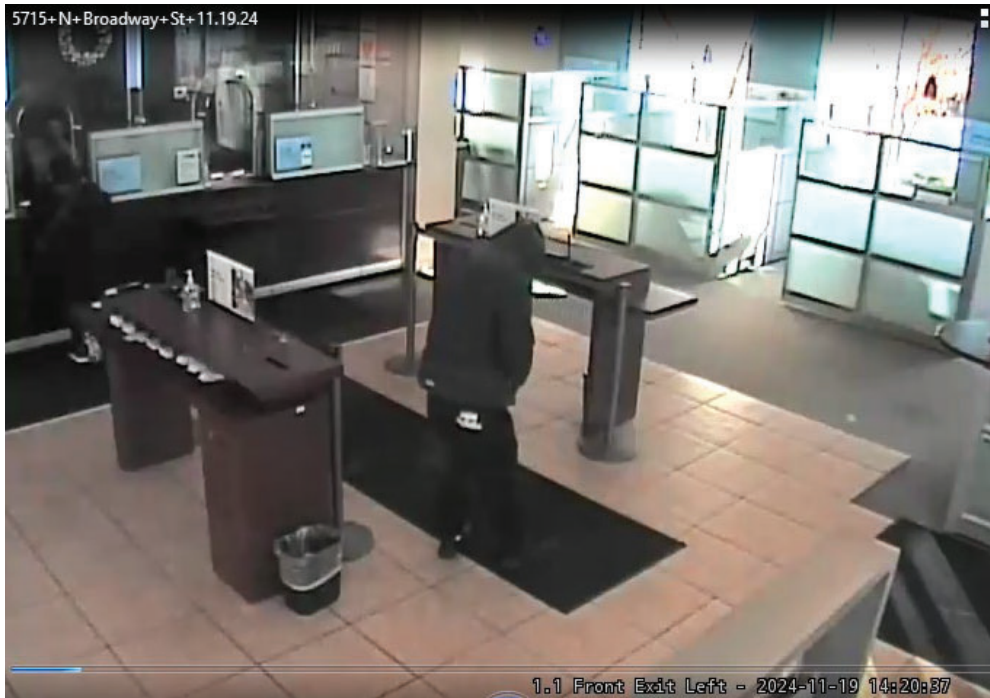
4. In summary, and as described further below, on November 19, 2024, NAENB MERSHAH robbed the Chase Bank located at 5715 North Broadway in Chicago, Illinois (the “Broadway Chase Bank”).

5. At approximately 2:20 p.m., an individual (later identified as MERSHAH) entered the Broadway Chase Bank and provided a note to a teller reading “I have Gun Give me the money Before I shot.” The teller did so, and MERSHAH escaped with approximately \$2,545.

6. MERSHAH robbed the bank while wearing court-ordered electronic location monitoring equipment. Records associated with that equipment reflect MERSHAH being at or near the Broadway Chase Bank at the time of the robbery, at the Bryn Mawr CTA Red Line station immediately after fleeing, and at the Wilson CTA Red Line station shortly after that. Police Observation Device cameras captured the bank robber (whose appearance matched MERSHAH’s) walking from the direction of the Broadway Chase Bank, under CTA Red Line elevated tracks, and entering the Bryn Mawr station, consistent with MERSHAH’s electronic location monitoring. CTA surveillance footage captures MERSHAH at both the Bryn Mawr and Wilson stations at times consistent with the electronic monitoring records. In conjunction with the electronic location monitoring records, a comparison of CTA surveillance footage and a known image of MERSHAH confirmed that MERSHAH was the offender who robbed the Broadway Chase Bank.

B. November 19, 2024 Robbery of the Broadway Chase Bank

7. More specifically, according to surveillance footage from the Broadway Chase Bank and bank employees, at approximately 2:20 p.m. on or about November 19, 2024, an offender entered the bank wearing a dark, bulky winter coat with a circular logo on the left breast, a dark colored hooded sweatshirt, a green ski mask covering the lower half of his face up to the bridge of his nose, black pants with a white logo on the back right pocket, and dark shoes.



(Image of offender with white logo on back right pocket of pants in customer area of Broadway Chase Bank)

8. According to surveillance footage from the Broadway Chase Bank, at approximately 2:25 p.m., the offender approached a teller window.

Digital Video Snapshot

Recorder: IL - Chicago - Edgewater Broadway - 5715 N Broadway St - 153256 - 4467 -DVR-3298

Camera Name: 2.1 Teller #2

Time: 2024-11-19 02:25:47 PM (UTC-06:00) Central Standard Time



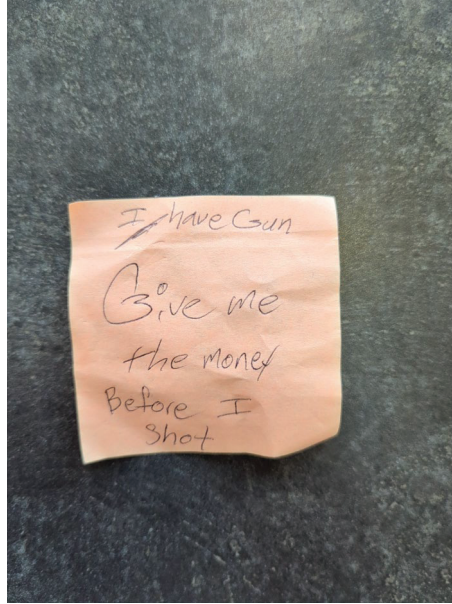
Capture Size: 704 x 528 pixels
Device Network Name: MNAR1612V141
Device Serial Number: AR1612V141
Device Station ID: 3298

(Image of offender at teller window of Broadway Chase Bank)

9. According to Victim Teller 1, Victim Teller 1 was working at the teller window at the Broadway Chase Bank at approximately 2:25 p.m. on November 19, 2024.

10. According to Victim Teller 1, after s/he finished helping another bank customer, s/he told the offender, that s/he could help him.

11. According to surveillance footage from the Broadway Chase Bank, at approximately 2:25 p.m., the offender handed Victim Teller 1 a demand note stating, "I have Gun Give me the money Before I shot".



(Image of demand note)

12. According to Victim Teller 1, the offender approached the teller window and handed Victim Teller 1 a pink post-it note, which Victim Teller 1 recalled as stating, "Give me all the money I have a gun I will shot." Victim Teller 1 complied and gave the offender money from underneath the teller station.

13. According to surveillance footage from the Broadway Chase Bank and bank employees, Victim Teller 1 provided United States currency to the offender. The offender took the money and fled the Broadway Chase Bank. According to Victim Teller 1, the offender took the money, dropped a \$50 bill, and fled from the bank.

14. Victim Teller 1 described the offender as a black male who appeared to be in his late 20s to mid-30s, with a slim build, and approximately 5'3" in height. Victim Teller 1 also described the offender as wearing a cloth mask over his face leaving his eyes visible, and that the offender had a tattoo above his right eyebrow.

15. According to surveillance footage from the Broadway Chase Bank, the offender fled from the bank at approximately 2:26 p.m.

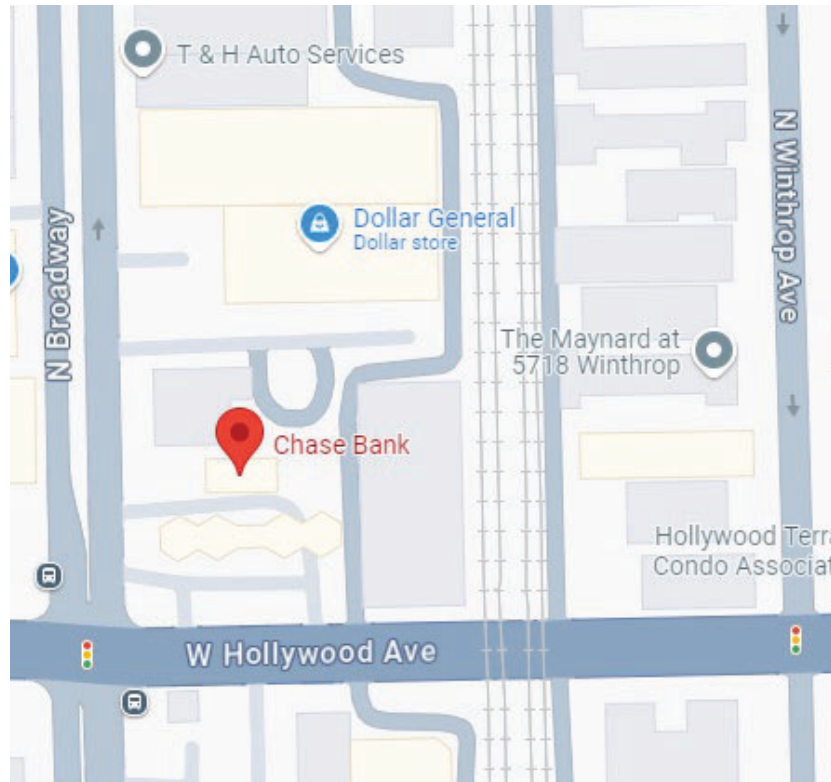
16. According to Chase Bank representatives, an audit conducted on or about November 19, 2024, confirmed that the offender took approximately \$2,545 from the Broadway Chase Bank. The representatives confirmed that at the time of the November 19, 2024 robbery, the Broadway Chase Bank's deposits were insured by the Federal Deposit Insurance Corporation.

17. Law enforcement has also obtained a copy of Chase Bank's Federal Deposit Insurance Corporation certificate, which confirms that the Broadway Chase Bank was insured by the Federal Deposit Insurance Corporation on November 19, 2024.

C. Flight from Broadway Chase Bank

1. POD Footage

18. The Broadway Chase Bank is located on Broadway, just north of Hollywood Avenue and west of North Winthrop Avenue.

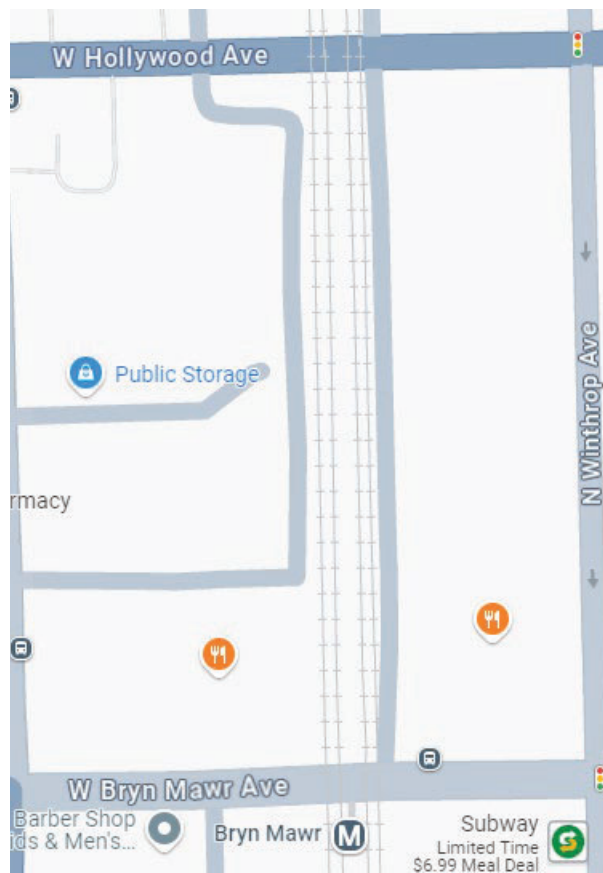


(Google Maps image of Broadway Chase Bank in relation to Hollywood Avenue and North Winthrop Avenue)

19. According to Chicago Police Genetec Surveillance Camera System (“POD”) #4124¹ footage reviewed by an FBI Task Force Officer, at approximately 2:26 p.m., an individual fleeing from the direction of the Broadway Chase Bank, wearing a blue coat and black pants, fled southeast and across Hollywood Avenue and underneath the Chicago Transit Authority (“CTA”) Red Line elevated tracks.

20. Bryn Mawr Avenue is the street located immediately south of Hollywood Avenue.

¹ According to law enforcement officers, POD #4124 is located at 1099 West Hollywood Avenue and captures video of activity near the intersection of Hollywood Avenue and North Winthrop Avenue, including activity west of POD #4124, in the direction of the Broadway Chase Bank.



(Google Maps image of Bryn Mawr Avenue in relation to Hollywood Avenue)

21. According to POD #3705W² footage reviewed by an FBI Task Force Officer, approximately one minute later, at approximately 2:27 p.m., an individual emerged from underneath the CTA Red Line elevated tracks in a hurried manner, wearing a maroon or red shirt, and black pants consistent with the pants worn by the offender.

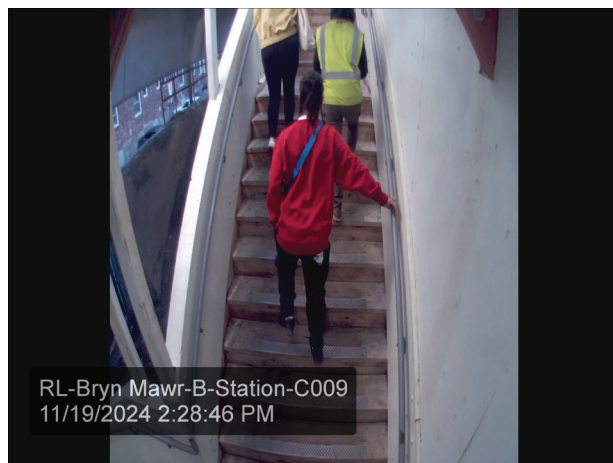
22. According to POD #3705W footage, the individual jogged to the south side of Bryn Mawr Avenue and jumped a concrete construction barrier. The

² According to law enforcement officers, POD #3705W is located at the intersection of Bryn Mawr Avenue and North Winthrop Avenue and captures video of activity near that intersection, including activity west of POD #3705W, towards the Bryn Mawr CTA Red Line station.

individual then appeared to enter the entrance to the Bryn Mawr CTA Red Line station.

2. CTA Surveillance Footage

23. According to CTA surveillance footage at the Bryn Mawr Red Line station, at approximately 2:28-2:29 p.m., an individual wearing a red sweatshirt and black pants with a white logo on the back right pocket jumped over a turnstile. The individual ultimately entered a southbound Red Line train.



(Image of individual in Bryn Mawr CTA Red Line station with white logo on back right pocket of pants)

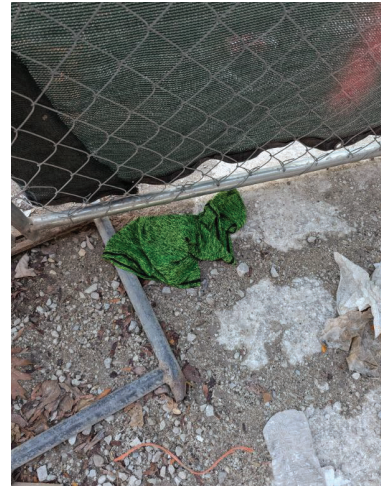
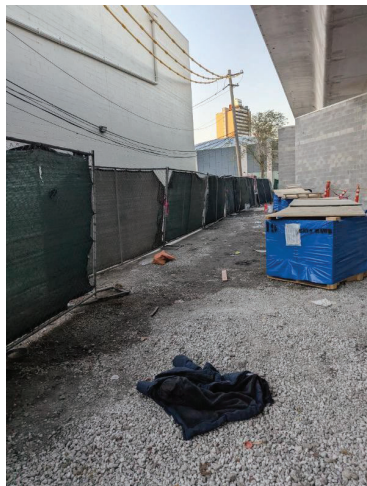
24. According to CTA surveillance footage at the Wilson Red Line station, at approximately 2:43 p.m., the same individual exited the Wilson Red Line station.

3. Recovery of Dark, Bulky Winter Coat with Circular Logo on Left Breast and Green Ski Mask

25. The FBI Task Force Officer who had reviewed the POD footage described above alerted members of the FBI Violent Crime and Fugitive Task Force (“VCFTF”) of the robbery of the Broadway Chase Bank. Members of the VCFTF

responded to the robbery, including by canvassing the area surrounding the Broadway Chase Bank for physical evidence related to the robbery.

26. Members of the VCFTF canvassed the area underneath the CTA Red Line elevated tracks between Hollywood Avenue and Bryn Mawr Avenue. Upon canvassing this area, members of the VCFTF recovered a dark blue, bulky winter coat with a circular logo on the left breast and a green ski mask, consistent with those worn by the offender.



(Images of blue coat and green ski mask found beneath elevated tracks)

27. Based on the above, I believe that the individual in the red shirt is the offender, and that he removed the jacket, hooded sweatshirt, and green ski mask he was wearing during the robbery of the Broadway Chase Bank while he was underneath the CTA Red Line elevated tracks.

D. Identification of MERSHAH as the Offender

28. In summary, law enforcement has identified the offender as NAENB MERSHAH based on a comparison of a known image of MERSHAH to CTA

surveillance footage, Victim Teller 1's description, and electronic location monitoring data.

1. Visual Evidence

29. I obtained an Illinois state identification photo for MERSHAH. I compared that image to images taken of the offender in the Bryn Mawr CTA Red Line station immediately following the robbery of the Broadway Chase Bank. Based on my comparison, and particularly the consistent location of distinctive facial tattoos, I identified the offender as MERSHAH.



(Image of individual in Bryn Mawr CTA Red Line station; Driver's License photo of MERSHAH)

30. In addition, according to Victim Teller 1, the offender had a tattoo above his right eyebrow. MERSHAH has a tattoo above his right eyebrow, consistent with the individual in the Bryn Mawr CTA Red Line station.



(Image of individual in Bryn Mawr CTA Red Line station)

31. Victim Teller 1 also described the offender as in his late 20s to mid-30s, with a slim build, and approximately 5'3" in height. According to law enforcement records, MERSHAH is 31 years old, 5'7" in height, and weighs 140 pounds.

2. Electronic Location Monitoring Data

32. According to Circuit Court of Cook County records, on September 4, 2024, MERSHAH pleaded guilty to retail theft in Case No. 24 CR 1858-01. MERSHAH was sentenced to 2 years' probation, which included a condition of GPS electronic location monitoring.

33. According to Cook County Adult Probation records, MERSHAH was on electronic monitoring on November 19, 2024.

34. According to Cook County Adult Probation records, on November 19, 2024, from approximately 2:20 p.m. to 2:26 p.m., electronic monitoring records place

MERSHAH at 5717 North Broadway and 5719 North Broadway. This area is consistent with the approximate location of the Broadway Chase Bank (5715 North Broadway).

35. According to Cook County Adult Probation records, on November 19, 2024, at approximately 2:27 p.m., electronic monitoring records place MERSHAH at 1135 West Hollywood Avenue. This area is consistent with the approximate location of the CTA Red Line elevated tracks located between Hollywood Avenue and Bryn Mawr Avenue, and the time the bank robber was present at this location.

36. According to Cook County Adult Probation records, on November 19, 2024, from approximately 2:29 p.m. to 2:38 p.m., electronic monitoring records place MERSHAH at 1115 West Bryn Mawr Avenue and 5536 North Winthrop Avenue. This area is consistent with the approximate location of the Bryn Mawr CTA Red Line station, and the time the bank robber was present at this location.

37. According to Cook County Adult Probation records, on November 19, 2024, at approximately 2:43 p.m., electronic monitoring records place MERSHAH at 1110 West Wilson Avenue. This area is consistent with the approximate location of the Wilson CTA Red Line station, and the time the bank robber was present at this location.

II. CONCLUSION

38. Based on the information above, I respectfully submit that there is probable cause to believe that NAENB MERSHAH robbed the Broadway Chase

Bank on or about November 19, 2024, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT.



JOSEPH EDGAR LEE THOMAS
Special Agent, Federal Bureau of
Investigation

SWORN TO AND AFFIRMED by telephone November 25, 2024.



Honorable KERI L. HOLLEB HOTALING
United States Magistrate Judge