

AO 442 (Rev. 01/09) Arrest Warrant

AUSA Matthew A. Roth (313) 226-9186
Special Agent Michael Garland (313) 965-2323

UNITED STATES DISTRICT COURT

for the
Eastern District of Michigan

I hereby certify that the foregoing is
a true copy of the original on file in this
Office.
U.S. DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

BY: [Signature]
Deputy

United States of America

v.

Todd Keith

Case: 2:16-mj-30450

Judge: Unassigned,

Filed: 10-06-2016 At 01:39 PM

USA v. SEALED MATTER(CMP)(MLW)

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Todd Keith

who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Title 18 U.S.C., § 2113(a) - Bank Robbery

Title 18 U.S.C. § 924(c) - Possession of a firearm in furtherance of a crime of violence

ANTHONY P. PATTI

Date: October 6, 2016

City and state: Detroit, Michigan

Issuing officer's signature

ANTHONY P. PATTI

UNITED STATES MAGISTRATE JUDGE

Printed name and title

Return.

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

AO 91 (Rev. 08/09) Criminal Complaint

AUSA : Matthew A. Roth (313) 226-9186
Special Agent : Michael Garland (313) 965-2323

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Todd Keith

Case:2:16-mj-30450

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USA v. SEALED MATTER(CMP)(MLW)

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 September 30, 2016 thru October 3, 2016 in the county of Wayne in the
Eastern Judicial District of Michigan, the defendant(s) violated:

Code Section

Title 18 U.S.C. § 2113

Title 18 U.S.C. 924(c)

Offense Description

Bank Robbery

Possession of a firearm in furtherance of a crime of violence

This criminal complaint is based on these facts:

See Attached Affidavit

I hereby certify that the foregoing is
a true copy of the original on file in this
Office.

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

BY:

Deputy

☒ Continued on the attached sheet.

Complainant's signature

Special Michael Garland, F.B.I.

Printed name and title

Sworn to before me and signed in my presence.

Date: October 6, 2016

City and state: Detroit, Michigan

ANTHONY P. PATTI

Judge's signature

Hon. Antony P. Patti, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Michael Garland, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation, and have been since July, 1989. I have received training in conducting criminal investigations and am currently assigned to investigate violations of federal criminal law, including bank robberies. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses.

2. I am aware of the following information from several sources, including but not limited to, my own personal observations and participation in this investigation and my review and analysis of oral and written reports.

3. I make this affidavit from personal knowledge based on my participation in this investigation, including the writing and review of reports by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, 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 the details or facts related to this investigation.

4. Affiant, along with other law enforcement personnel, have developed probable cause to believe that Todd Raymond KEITH was in possession of a firearm in furtherance of a crime of violence in violation of Title 18 U.S.C. § 924(c).

5. Affiant, along with other law enforcement personnel, have developed probable cause to believe that Todd Raymond KEITH robbed a bank in violation of Title 18 U.S.C. §2113.

II. INVESTIGATION AND PROBABLE CAUSE

6. At approximately 10AM, September 30, 2016, a residence located in Van Buren Township, Michigan, was burglarized. Among the items stolen were two shotguns. One of the shotguns was a Remington pump action shotgun with a scope affixed to the shotgun. A witness observed a red colored Ford pickup truck, with an enclosed black trailer attached, in the immediate vicinity of the burglarized home.

7. On September 30, 2016, at approximately 5PM, an unidentified male, brandishing a pump action shotgun equipped with a scope entered Chase Bank, located at 5436 Whittaker Road, Ypsilanti Township, Michigan. The man announced he was robbing the bank. The subject fired two rounds from the shotgun and hit the wall behind a teller window and a glass enclosed office window. The subject next demanded money from one of the tellers. He received

approximately \$1700 in cash and exited the bank. The subject was observed departing the bank parking lot in a dark colored sedan. The man wore gloves during the robbery.

8. On September 29, 2016, at 4AM, a red colored mini-skid excavator and a yellow tree stump grinder were stolen from Arbor Care Tree Surgeons, located at xxx Dino Drive, Scio Township, Michigan. Video surveillance shows a white male on the premises on or about the robbery. The white male was identified by the owner of Arbor Care Tree Surgeons as KEITH. The owner qualified his identification and indicated he was 80 to 90 percent certain the individual was KEITH who was a former employee. A pickup truck with an attached trailer was observed in the vicinity of Arbor Care Tree Surgeons at the time of the robbery. Two days earlier, on September 27, 2016, KEITH's current employer, Brett Bourne, the owner of a landscaping business called, "Bourne to Mow," located at xxx Dino Drive, Scio Township, Michigan, loaned KEITH a red colored Ford F-250 pickup truck and a dark blue 24-foot trailer.

9. On September 29, 2016, the Lathrup Village Police Department, Lathrup Village, Michigan, responded to a residence regarding a possible home invasion in progress. At the residence, police made contact with KEITH who was driving a red Ford pickup and trailer registered to Brett Bourne. The police observed a red bulldozer type machine and a yellow tree stump remover in the rear

of the trailer. The items in KEITH's trailer matched the description of the items stolen from Arbor Care Tree Surgeons.

10. On October 3, 2016, Bourne observed his trailer parked at a tire store located in Romulus, Michigan. He notified police authorities who were informed by employees of the tire store that, on or about October 1 and 2, KEITH was observed driving a red colored Ford pickup truck that was pulling a trailer. They also reported seeing KEITH in a silver colored Dodge SUV parked across the street from the tire store on the morning of October 3, 2016. The employees of the tire store had prior contact with KEITH on several occasions. Based on the prior contact, they are familiar with who he is and what he looks like.

11. On October 3, 2016, at approximately 10:30AM, a male subject wearing a full faced Halloween mask entered the Key Bank located at 5300 Willis Road, Augusta Township, Michigan. The man announced he was robbing the bank. He was armed with a shotgun which he pointed at bank employees, threatening to kill them if they resisted. The subject demanded money from a teller and told her to produce her driver's license. After looking at and taking the driver's license, the subject told the teller he now knows where she lives. He threatened that if the money contained a dye pack or bait money, he would kill her family and children. The teller removed a tracker from the money. Following instructions from the subject, the teller placed the money in a white plastic money

basket. The subject departed the bank with approximately \$8,000 cash, the plastic money basket, and the teller's driver's license. He was observed on surveillance cameras entering a silver colored Dodge Journey (SUV), which had damage on the driver's side rear quarter panel.

12. Amanda Reyes was identified as a former girlfriend of KEITH. On October 4, 2016, a silver colored Dodge Journey with damage to the driver's side rear quarter panel was observed parked in the driveway of Amanda Reyes' parents' home in Lincoln Park, Michigan. The vehicle was impounded by the Michigan State Police.

13. Amanda Reyes was interviewed and provided the following information:

- a. She formerly dated Todd KEITH and that he is the father of their daughter;
- b. KEITH borrowed her car, a silver colored Dodge Journey, on Monday morning, October 3, 2016, and returned it to her on Monday evening;
- c. When the vehicle was returned to her, the driver's side rear quarter panel was damaged;
- d. On Monday evening, KEITH, accompanied by an unidentified black male, was observed in the garage and basement of her home; and

- e. KEITH also visited her home several times during the weekend of October 1 through 2, 2016. She observed him in the basement and garage of her home during those visits.

14. Reyes consented to a search of her home at 1xxx4 Dora Street, Melvindale, Michigan. Located in the basement and garage of her home were the following items related to the aforementioned bank robberies:

- a. One shotgun, stolen from the home in Van Buren Township on September 30, 2016;
- b. One sawed off wooden stock from a Remington shotgun;
- c. The plastic money basket taken during the Key Bank robbery;
- d. Money wrappers; and
- e. A UPC tag from Wal-Mart for a Halloween mask.

15. Todd KEITH is presently on probation in Washtenaw County, Michigan. His probation officer advised that KEITH's current cellular telephone number is (XXX) XXX-6857. Amanda Reyes confirmed that KEITH uses telephone number (XXX) XXX-6857.

Conclusion

16. Probable causes exists to believe that on or about, September 30, 2016 and October 3, 2016, in the Eastern District of Michigan, Todd KEITH, did

knowingly possess a firearm in furtherance of a crime of violence in violation of Title 18 U.S.C. 924(c).

III. CONCLUSION

17. Probable cause exists to believe that on or about, September 30, 2016 and October 3, 2016, in the Eastern District of Michigan, Todd KEITH, robbed a bank in violation of 18 U.S.C. §2113. Todd KEITH also violated Title 18, United States Code, Section 924(c) by using a firearm during and relation to a crime of violence.

Respectfully Submitted,

Michael Garland, Special Agent, FBI

Sworn to and subscribed before me on
this 6th day of October, 2016.

ANTHONY P. PATTI

ANTHONY P. PATTI
UNITED STATES MAGISTRATE JUDGE

CMPSpeedyTrial

**U.S. District Court
Eastern District of Michigan (Detroit)
CRIMINAL DOCKET FOR CASE #: 2:16-mj-30450-DUTY-1**

Case title: United States of America v. Keith

Date Filed: 10/06/2016

Assigned to: Magistrate Judge
Unassigned

Defendant (1)

Todd Raymond Keith

Pending Counts

Disposition

None

Highest Offense Level (Opening)

None

Terminated Counts

Disposition

None

Highest Offense Level (Terminated)

None

Complaints

Disposition

Complaint

Plaintiff

United States of America

represented by **Matthew A. Roth**
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LEAD ATTORNEY
ATTORNEY TO BE NOTICED
Designation: U.S. Attorney

Date Filed	#	Docket Text
10/06/2016	<u>2</u>	Warrant for Arrest Issued by Magistrate Judge Anthony P. Patti as to Todd Raymond Keith. (LHos) Modified on 10/7/2016 (LHos). (Entered: 10/06/2016)
10/07/2016	<u>4</u>	ORDER WITH MOTION to Unseal <u>2</u> Arrest Warrant Issued as to Todd Raymond Keith. Signed by Magistrate Judge Anthony P. Patti. (LHos) (Entered: 10/07/2016)