

SEALED

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Central District of Illinois

United States of America
v.

Heather Horrihs and Theodis Parnell

Defendant(s)

Case No.

21-mj-3118

FILED
OCT 15 2021
CLERK OF THE COURT
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

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 13, 2021 in the county of Sangamon in the
Central District of Illinois, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 2113	Bank Robbery

This criminal complaint is based on these facts:

See affidavit.

Continued on the attached sheet.

s/ Robert Berntsson


Complainant's signature


FBI SA Robert Berntsson

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/15/2021

s/ Tom Schanzle-Haskins


Judge's signature

City and state; Springfield, Illinois

Tom Schanzle-Haskins

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
AND APPLICATION FOR AN ARREST WARRANT**

I, Robert Berntsson, a Special Agent with the Federal Bureau of Investigation, hereinafter referred to as FBI, being duly sworn, depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the FBI and have been so employed since 2017. I have worked in law enforcement since 2014, working as an Intelligence Analyst for the Hartford Police Department in Hartford, Connecticut prior to my employment at the FBI. I have conducted or participated in investigations of racketeering enterprises, illegal gambling operations, money laundering, extortion, unlawful drug trafficking, and violent crimes. Among other things, I have conducted or participated in surveillance, the execution of search warrants, debriefings of informants, reviews of taped conversations, and have participated in investigations that included the interception of wire communications and the use of numerous different types of electronic devices, including cellular phones. I have received extensive training in criminal investigations, social media investigations, and cellular telephone analysis.

2. The facts set forth in this affidavit are based on my personal knowledge and investigation. This affidavit is also based on knowledge I

obtained from other individuals, including other law enforcement officers, my review of documents related to this investigation, communications with others who have personal knowledge of the events and circumstances described in this affidavit, and information gained through my training and experience.

3. I make this affidavit in support of an application for an arrest warrant for violations of Title 18, United States Code, Section(s) 2113(a).

PROBABLE CAUSE

4. On or about Monday, September 13, 2021, at approximately 2:30 p.m. Central Daylight Time (CDT) the ALLIANCE COMMUNITY BANK (ALLIANCE BANK), located at 6530 North IL-29, Springfield, Illinois 62707 was robbed. ALLIANCE BANK sits on the northeast corner at the intersection of IL-29 and West Andrew Road. North IL-29 is a north-south running road, and West Andrew Road is an east-west running road. The actions of the subject(s) of the investigation were recorded by the banks security surveillance system. One subject was observed walking northbound, crossing West Andrew Road from the vicinity of MINIT MART, located at 6490 North IL-29, Springfield, Illinois 62707, and entering ALLIANCE BANK. While walking into ALLIANCE BANK, the subject was

observed looking at and manipulating a device consistent with the size and shape of a cellular telephone.

5. The subject entered ALLIANCE bank and was observed placing a black and blue colored box on the teller's counter. The box had a note taped to the top that read as follows "This is not a game!! It is a bomb in the box it will go off in less 10 minutes!!! Any sudden moves or no dye packz only big bills!!! If any sudden moves or dye packs we all". Part of the note was covered by tape used to secure it to the box. The subject was then observed having two bank employees place cash into a green and yellow colored bag the target subject provided. The subject stole approximately \$12,888.00 which included "bait bills" from two different teller stations. During the robbery, the subject was observed manipulating a device consistent with the size and shape of a cellular telephone, holding the device to their left ear for approximately 28 seconds, and then observed holding the device in their hand. From my training and experience I know that criminals use cellular telephones to contact co-conspirators to assist with crime(s). These actions include, but are not limited to, the staging and use of getaway vehicles and the coordination of events in order to rapidly flee from the scene of a crime.

6. The subject then departed ALLIANCE BANK and was observed walking south across West Andrew Road, returning to the vicinity of MINIT MART. Once back in the vicinity of MINIT MART, the suspect was observed approaching the passenger side of a dark colored sedan, the vehicle then departed the eastern lot of MINIT MART turning west onto West Andrew Road, traveling briefly on the road, turning south into the west lot of MINIT MART, traveling through the lot, then departing south on North IL-29.

7. A review of video surveillance footage recovered from MINIT MART showed a dark colored sedan believed to be a black colored, older model Toyota Camry turning south into the west lot of MINIT MART, cutting through the gas station parking lot in a manner consistent with attempting to avoid traffic and the traffic light at the intersection of West Andrew Road and IL-29, and pulling out of MINIT MART, traveling south on IL-29 at a time consistent with the target vehicle departing the vicinity of the robbery.

8. On or about Monday, September 20, 2021, the Illinois State Police Forensic Science Laboratory provided the FBI with a report indicating that one of the fingerprints from the black and blue colored box with the note taped to the top had been successfully identified as belonging to HEATHER DARLENE HERRIGHS (HERRIGHS), date of birth February

5, 1979. HERRIGHS' DMV information listed her address as "227 N Daniel Ave, Rear, Springfield, Illinois." A review of HERRIGHS' biometric data and driver's license photo provided information consistent with that of the subject observed in surveillance video footage of the robbery. This included, among other things, a comparison of HERRIGHS' listed height and a comparison of the subject's height as compared to height markings on the interior door frame of the front entrance of ALLIANCE BANK.

9. On or about Friday, September 24, 2021, the FBI identified HERRIGHS in a female escort ad on the website SKIPTHEGAMES.EU. SKIPTHEGAMES.EU is a website known to be used for the purposes of sex service solicitation. HERRIGHS was identified after a visual comparison of HERRIGHS' DMV photograph and the photographs posted on the SKIPTHEGAMES.EU ad. The initial ad found was posted on or about Thursday, January 9, 2020, and listed a contact number of "(217) 303-0993." On or about Thursday, September 30, 2021, information provided by T-Mobile pursuant to a federal grand jury subpoena listed telephone number 217-303-0993 as being subscribed to by "HEATHER HERRIGHS." The account was activated on or about Tuesday, October 8, 2019, and was terminated on or about Sunday, March 8, 2020. The T-

Mobile subpoena also provided HERRIGHS' address as "227 N Daniel Ave, Springfield, IL 62702."

10. On or about Saturday, September 25, 2021, a similar ad was posted on SKIPTHEGAMES.EU. A photo of HERRIGHS's face was included in the ad. The telephone number "217-290-6243" was included as the number to call in the ad. Telephone number 217-290-6243 was ported to Onvoy LLC. An open-source search of the company revealed that it provided "network-based voice and text messaging services." From my training and experience I know that criminals will use network based or "VOiP" numbers to disguise their actual telephone numbers in an effort to conceal their identity and location from law enforcement.

11. On or about Tuesday, September 28, 2021, an FBI undercover employee (UC1) contacted telephone number 217-290-6243 and received no reply.

12. On or about Wednesday, September 29, 2021, UC 1 had a text message conversation with telephone number 217-290-6243. During the conversation it was agreed upon that UC1 would pay \$160.00 for an hour of time spent with the woman seen in the ad, known by the FBI to be HERRIGHS. UC1 received a response stating that they could spend time together in the vicinity of East Clear Lake Avenue, Springfield, Illinois.

13. On or about Thursday, September 30, 2021, UC1 contacted telephone number 217-290-6243 and received no reply.

14. On or about Sunday, October 3, 2021, UC1 had a text message conversation with telephone number 217-290-6243. During the conversation, the user stated HERRIGHS was located in the vicinity of Yale Boulevard and Stanford Avenue, in Springfield, Illinois.

15. On or about Monday, October 4, 2021, UC1 had a text message conversation with telephone number 217-290-6243, during the conversation it was agreed that UC 1 will meet with the woman in the photo, who the FBI knows to be HERRIGHS, at "2640 Yale Boulevard, Springfield, Illinois." The conversation also included the following, "WE DOING EITHER HH OR WHOLE HR BABBY". Your affiant knows from training and experience this terminology to mean "half hour" or "whole hour."

16. On or about Monday, October 4, 2021, pursuant to a grand jury subpoena, TextNow, Inc., a network-based voice and text messaging service company, provided data for cellular number 217-290-6243. TextNow, Inc. did not register additional telephone numbers for subscribers. The telephone number 217-290-6243 was subscribed to KORTNIE FICKAS (FICKAS). On or about August 12, 2021, the TextNow,

Inc. account associated with telephone number 217-290-6243 was registered to FICKAS and remained active through the subpoena return on or about October 1, 2021. Your affiant knows from training and experience that criminals will register telephones under pseudonyms and create fictitious email accounts to conceal criminal activity and evade investigative efforts by law enforcement. TextNow, Inc. provided information indicating that text message content had not yet been deleted.

17. Records provided by TextNow indicated that 217-290-6243 and telephone number 217-816-1815 were in contact approximately 75 times from on or about September 2, 2021, through October 1, 2021. Telephone number 217-816-1815 was a T-Mobile number associated with THEODIS PARNELL (PARNELL). Local law enforcement reporting indicated that on or about September 23, 2021, PARNELL was associated with 217-816-1815 during a call for service. On or about October 14, 2021, pursuant to a grand jury subpoena, T-Mobile provided information indicating that telephone number 217-816-1815 was subscribed to "Jenny Shafer," a resident of 2312 South 6th Street, Springfield, Illinois.

18. On or about Monday, September 20, 2021, a similar ad was posted on SKIPTHEGAMES.EU. HERRIGHS was identified in the new ad due to common photographs posted in other ads in which HERRIGHS was

identified. PARNELL's telephone number, 217-816-1815, was included in the ad as the listed number to contact to solicit sex services. Similar ads listing telephone number 217-816-1815 were posted on Saturday, September 25, 2021, and Tuesday, October 5, 2021.

19. Ads posted on SKIPTHEGAMES.EU on or about Tuesday, October 5, 2021, and Wednesday, October 6, 2021, included photographs of HERRIGHS's face. The ads also listed telephone number 217-816-1815 as the telephone number to contact to solicit sex services.

20. On or about Tuesday, October 5, 2021, FBI Special Agents conducted surveillance in the area of Yale Boulevard and Stanford Avenue, Springfield, IL. A black Toyota Camry bearing IL license plate CZ80378 was observed parked in the driveway of 2640 Yale Boulevard. The license plate was registered to PARNELL and displayed on a 1998 black Toyota Camry. FBI Agents observed a white female with blonde hair, consistent in appearance with HERRIGHS, and a black male, consistent in appearance with PARNELL, wearing a dark colored shirt get into the black Camry, exit the driveway, and pull into the parking lot at 1044 East Stanford Ave, Springfield, IL. Shortly thereafter FBI Agents observed PARNELL driving the black Toyota Camry. PARNELL was observed wearing a dark colored

shirt and a black colored hat. PARNELL was also observed sitting on the front porch of 2640 Yale Boulevard.

21. On or about Wednesday, October 6, 2021, local law enforcement reporting indicated that PARNELL utilized an Eco ATM, located at Ruler Foods, 2711 Sangamon Ave. on September 18, 2021 at 1052hrs. A review of the law enforcement reporting data showed PARNELL utilizing the Eco ATM to sell cellular telephones.

22. On or about Friday, October 8, 2021, FBI Agents reviewed surveillance footage at Ruler Foods. Agents observed that on or about Saturday, September 18, 2021, a black Toyota Camry arrived. A white female with blonde hair, consistent in appearance with HORRIGHS, along with PARNELL, were observed exiting the vehicle, entering Ruler Foods and operating the Eco ATM. PARNELL and the white female were then observed exiting the store, entering back into the Toyota Camry, and departing the vicinity of the store.

23. On or about Thursday, October 14, 2021, PARNELL and HORRIGHS were arrested by Special Agents of the FBI in the vicinity of Sleep Inn, located at 3470 Freedom Drive, Springfield, Illinois. PARNELL and HORRIGHS arrived at Sleep Inn together in the black Toyota Camry bearing IL license plate CZ80378 that was registered to PARNELL. The

vehicle identification number (VIN) of the Camry was 4T1BF22K6XU087564.

24. During a post-Miranda, custodial interview, PARNELL confessed to participating in the bank robbery at ALLIANCE BANK. PARNELL claimed that HERRIGHS had the idea to rob the bank. PARNELL admitted to handling and manipulating the "bomb box" used during the bank robbery. PARNELL used his vehicle, a black colored Toyota Camry bearing Illinois license plate CZ80378, to drive HERRIGHS to ALLIANCE BANK. PARNELL parked across the street from ALLIANCE BANK in the parking lot of MINIT MART. PARNELL let HERRIGHS out of his vehicle, but stayed in telephone contact with her while she robbed the bank. PARNELL used his cellular telephone associated with telephone number 217-816-1815 to stay on the phone with HERRIGHS during the robbery. HERRIGHS returned to PARNELL's Camry and entered the passenger side of the vehicle. PARNELL then drove HERRIGHS to the Mansion View Inn and Suites, located at 529 South 4th Street, Springfield, Illinois.

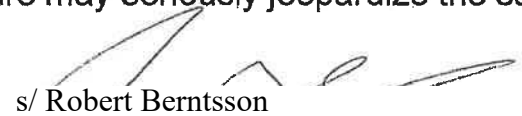
25. During a post-Miranda, custodial interview, HERRIGHS confessed to participating in the bank robbery at ALLIANCE BANK. HERRIGHS told FBI Agents she robbed the bank at the direction of

PARNELL. PARNELL and HERRIGHS constructed the "bomb box" together. PARNELL drove HERRIGHS to the bank in his black colored Toyota Camry bearing Illinois license plate CZ80378. HERRIGHS contacted PARNELL on PARNELL's cellular telephone associated with telephone number 217-816-1815 during the robbery so PARNELL could hear what was happening in the bank. PARNELL and HERRIGHS returned to the Mansion View Inn and Suites, located at 529 South 4th Street, Springfield, Illinois, immediately after they conducted the robbery.

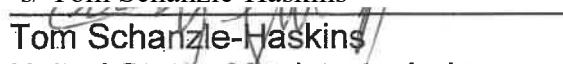
REQUEST FOR SEALING

26. I further request that the Court order that all documents in support of this application, including the affidavit and complaint, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize the safety of officers.

by telephon


s/ Robert Berntsson

Special Agent Robert Berntsson
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me this 15th day of October 2021.
s/ Tom Schanzle-Haskins

Tom Schanzle-Haskins
United States Magistrate Judge