

AFFIDAVIT

I, Bryce Husak, being first duly sworn, depose and state that I am a Special Agent with the United States Secret Service. I have been a Special Agent with the United States Secret Service for a year. My duties as a Special Agent include the investigation of conspiracy in violation of Title 18, United States Code (USC), section 371, identity theft in violation of Title 18, USC, Section 1028, and, access device fraud in violation of Title 18, USC, Section 1029.

As part of my duties, I am currently participating in a joint investigation with the Maryland Heights Police Department, the City of St. Charles Police Department, and the Clayton, Missouri Police Department. This investigation involves the use of stolen checks and identification documents at area financial institutions. The items were stolen from vehicle break-ins throughout the Eastern District of Missouri and elsewhere between August 25, 2010 and August 30, 2010.

The information contained within this affidavit is based on my investigation and on the information either personally known to me or provided to me by other law enforcement officers in my official capacity. Since this affidavit is being submitted for the limited purpose of securing a warrant for the arrest of TARA FUNK, BRANDON TAYLOR, STEVEN BLACK, JEARVON JACKSON, AND KEVIN ROBINSON, I have set forth only the facts that I believe are necessary to establish probable cause that the suspects have violated the above listed statutes.

On or about August 30, 2010, the Maryland Heights Police Department received a call from the Bank of America located on Westport Plaza Drive that a white female, later identified as Tara Funk, was attempting to use a check drawn on the account of C.D.N. and an Florida drivers license in the name of S.R. to obtain \$1,485.00 through a drive through teller window. The bank's record system revealed that S.R. reported the theft of his drivers license and checks in July 2010. When the bank representatives delayed finalizing the transaction, Funk drove away.

Using a description of the vehicle provided by the bank employees, officers located and attempted to stop the vehicle. The vehicle increased speed and attempted to elude the police until it crashed into a light pole. Officers observed the crash and saw Funk in the vehicle and two male passengers fleeing on foot. One of the individuals, Steven Black, was caught in the front yard of a residence. The second male was caught after he attempted to bribe a resident into assisting in his escape.

After receiving her Miranda warnings, Funk informed officers that she was traveling with the two individuals arrested and two other black males from Florida across the country in order to obtain money by stealing identification documents, checkbooks, and credit cards through vehicle break-ins. Funk and the others would use the stolen identification documents to cash the stolen checks at various banks. Located in areas throughout the car, including the headliner, the officers located over \$2,832.00 in currency, stolen checks, the Missouri drivers license of M.D.R., credit and debit cards of B.M., M.H., and S.R., slips of paper with the names, addresses, and dates of birth of M.R., C.M.A., B.K.N., B.M.B., C.M.D., A.L.V., L.M.H., S.R., and, J.E.L., and a piece of paper with the address of the U.S. Bank located on Harvester Square in St. Charles

County, Missouri. When Taylor was arrested, he possessed \$1,320.00 and half of a \$20.00 bill. A search of Steven Black pursuant to his arrest revealed \$1,540.00 in currency tied to his scrotum with a shoe lace.

Based upon information provided by Funk, the officers went to the Quality Inn in St. Charles, Missouri which Funk identified as their lodging. Jearvon Jackson opened the door in response to the knock of the officers and provided consent to search the room after advising the officers that he was only staying in the room temporarily. Kevin Robinson who was within the room when the officers entered also provided consent to search although he stated he was merely visiting the room. A search of the room revealed drivers licenses and identification cards issued by the States of Kansas, Colorado, Missouri, Tennessee, and Florida to the following individuals: M.D., J.H., N.L., S.A., C.R., J.L., C.O., N.M., and M.B. The officers also found completed and blank checks drawn on seven separate accounts, seven social security cards, 18 credit and debit cards, currency, bank account information, and bank receipts. A window punch was also located in the room.

None of the checks, social security cards, credit cards, or debit cards had been issued to Funk, Jackson, Robinson, Taylor, or Black. During an interview, Jackson revealed that he, Funk, Robinson, Taylor, and Black had traveled from Ft. Lauderdale, Florida. He also stated that he, Robinson, Taylor, and Black broke into vehicles and stole identification documents, checkbooks, and credit and debit cards. Jackson admitted using a window punch to break into a vehicle in order to steal a purse. Subsequent investigation has revealed the following regarding some of the identities, checks, and credit/debit cards found in the vehicle and the hotel room:

1. On August 25, 2010, B.B. reported to Lenexa, Kansas police that her purse was stolen from her vehicle while parked in a church parking lot. Four other vehicles reported having windows broken on the same occasion.
2. N.L. reported that her car window was broken at Shaw Park in Clayton, Missouri on August 27, 2010 and her purse was stolen. Two other individuals reported the same event.
3. C.N. reported that on August 26, 2010 in Cooper County, Missouri her purse was stolen after her car window was broken.
4. L.H., S.A., S.R., M.R., and J.H. reported vehicle break-ins and thefts from the following cities: Maryland Heights, Missouri; Ft. Lauderdale, Florida; Tampa, Florida; Webster Groves, Missouri; and, Lee Summit, Missouri.

According to Funk, her role was to pass the stolen checks at various banks while the others broke into the vehicles and stole the purses and wallets containing the identification documents, checks, and credit/debit cards.

Based on the foregoing, I believe there is probable cause to conclude that TARA FUNK, BRANDON TAYLOR, STEVEN BLACK, JEARVON JACKSON, AND KEVIN ROBINSON have violated Title 18, United States Code, Sections 371, 1028, Section 1029, and 1344.