

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TAVEYAN TURNBO

CASE NUMBER:

18CR 645**MAGISTRATE JUDGE WEISMAN****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 September 30, 2018, at Midlothian, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

Title 18, United States Code, Section 922(j)

Offense Description

did knowingly receive, possess, conceal, and store a stolen firearm, namely, (1) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372208945, (2) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372208928, and (3) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372207151, knowing and having reasonable cause to believe the firearm was stolen, and which firearm had traveled in interstate commerce prior to defendant's possession of the firearm

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

SARGON MACKSUD

Special Agent, Bureau of Alcohol, Tobacco,
Firearms & Explosives (ATF)

Sworn to before me and signed in my presence.

Date: October 1, 2018City and state: Chicago, Illinois*Judge's signature*M. DAVID WEISMAN, U.S. Magistrate Judge*Printed name and Title***RECEIVED****OCT 01 2018****INTAKE**
OCT 2 2018**M. DAVID WEISMAN
MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

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AFFIDAVIT

I, SARGON MACKSUD, being duly sworn, state as follows:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives. I have been so employed since approximately January 2017. My current responsibilities include the investigation of criminal violations relating to the federal firearms laws, including Title 18, United States Code, Sections 922 and 924.

2. This affidavit is submitted in support of a criminal complaint alleging that Taveyan TURNBO (TURNBO) has violated Title 18, United States Code, Section 922(j). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging TURNBO with receipt, possession, concealment, and storing of a stolen firearm, 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, and on information I have received from other law enforcement personnel and from persons with knowledge regarding relevant facts.

RUGER FIREARM UPS BURGLARY IN MEMPHIS, TENNESSEE

4. On September 28, 2018, the UPS distribution center in Memphis, Tennessee received sixteen pallets of firearms from the Ruger factory in North

Carolina. On September 30, 2018, a semi-trailer carrying sixteen pallets of firearms was scheduled to depart Memphis, Tennessee enroute to Dallas, Texas on September 30, 2018 at 8:00 a.m. At some time between 3:00 a.m. and 4:00 a.m., an alarm was triggered as an unauthorized U-Haul van drove onto the lot of the UPS distribution center. According to law enforcement, upon arrival at the distribution center, UPS employees observed two male, African-American individuals pushing a pallet of boxes across the lot. The individuals loaded the pallets into a U-Haul van, reversed and sped off the lot.

5. According to UPS, there were three stolen pallets and further investigation found that the contents of the three stolen pallets, contained approximately 367 firearms. The stolen items were .22 caliber and .380 caliber firearms.

RECOVERY OF FIREARMS IN MIDLOTHIAN, ILLINOIS

6. On September 30, 2018, at approximately 3:09 p.m., law enforcement received a call about suspicious activity at a store parking lot located in Midlothian, Illinois. Upon arrival, law enforcement found a U-Haul van parked in the lot bearing Arizona license plate AJ22258. The driver of the van identified himself as Individual A and the passenger of the van identified himself as Taveyan TURNBO. After a brief conversation, through the window of the van, law enforcement observed a white box with a "Ruger" logo on it.

7. Law enforcement requested that TURNBO and Individual A exit the van. Upon request, Individual A opened the front, driver's side door and ran.

TURNBO climbed into driver's seat, exited the van, and ran. After a brief chase, TURNBO and Individual A eluded law enforcement.

8. Law enforcement ran TURNBO's name through an investigative database and identified TURNBO as the passenger of the vehicle. Similarly, law enforcement ran Individual A's name through an investigative database and identified Individual A as the driver of the vehicle. After a search of the area, at approximately 6:54 p.m., law enforcement found and arrested TURNBO and he was positively identified as the passenger in the van.

9. Upon seizure of the U-Haul van, law enforcement recovered approximately 364 Ruger .22 caliber and .380 caliber firearms. Among these recovered Ruger firearms were: (1) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372208945, (2) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372208928, and (3) a Ruger, model LCP, caliber .380 pistol, bearing serial number 372207151. A check with the UPS distribution center located in Memphis, Tennessee found that the firearms recovered in the U-Haul van matched the firearms stolen from the UPS distribution center.

CONFESSION OF TURNBO

10. Following his arrest, law enforcement spoke with TURNBO. After waiving *Miranda*, TURNBO stated, in sum and substance that he knew the individual he was with in the U-Haul van had previously stolen items from train shipments. TURNBO denied participating in the theft but stated that he knew the firearms were stolen and that he was helping Individual A and his brother sell the stolen firearms.

Additionally, TURNBO stated that he and Individual A had sold at least three of the stolen firearms for a total of \$400.

CONCLUSION

20. Based upon the above information, there is probable cause to believe that on or about September 30, 2018, Taveyan TURNBO, did knowingly receive, possess, conceal, and store a stolen firearm which firearm had traveled in interstate commerce prior to defendant's possession of the firearm

FURTHER AFFIANT SAYETH NOT.

SARGON MACKSUD

Special Agent, Bureau of Alcohol, Tobacco,
Firearms & Explosives

SUBSCRIBED AND SWORN to before me on October 1, 2018.



M. DAVID WEISMAN

United States Magistrate Judge