

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

JON KARL MCREE FLEET,

Defendant.

Case No. 1:21-mj-203

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT AND ARREST WARRANT

I, William C. Beechum, being first duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since 2010. As such, I am an “investigative or law enforcement officer of the United States” within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. §§ 1951 and 924(c).

2. During my employment as an FBI Special Agent, I have been assigned to investigate, and have training and experience in investigating, violations of federal law, to include violent criminal activity and crimes against persons and property, and domestic and international terrorism. I am currently assigned to the Washington Field Office, Northern Virginia Violent Crimes Task Force.

3. I submit this affidavit in support of a criminal complaint charging JON KARL MCREE FLEET (“FLEET”) with using, carrying, and brandishing a firearm during and in relation to a crime of violence, namely, Hobbs Act Robbery (18 U.S.C. § 1951), and possessing a firearm in furtherance of such crime of violence, in violation of 18 U.S.C. § 924(c)(1)(A).

4. The facts and information contained in this affidavit are based upon my training and experience, personal knowledge, and observations during the course of this investigation, as well as information and evidence obtained from other agents and law enforcement officers involved in this investigation. All observations I did not personally make were relayed to me by the individuals who made them, or come from my review of records, documents, and other physical evidence obtained during the course of this investigation. This affidavit contains information necessary to support probable cause, and it is not intended to include each and every fact and matter observed by me or known to the government.

FACTUAL BASIS SUPPORTING PROBABLE CAUSE

5. The FBI and local law enforcement agencies have been investigating a series of armed robberies of commercial establishments that occurred from January 24, 2021 through March 13, 2021. During this time period, at least four commercial establishments in the Eastern District of Virginia and three commercial establishments in the District of Maryland have been robbed at gunpoint by one or two suspects. During the robberies, one of the suspects has consistently brandished a firearm. Investigators believe that JON KARL MCREE FLEET (“FLEET”) participated in and brandished a firearm at each of the robberies described herein. FLEET was recently arrested in Washington, D.C., on an outstanding arrest warrant obtained by the Fairfax County Police Department (“Fairfax County PD”). He has been in custody in Fairfax County since April 26, 2021.

The Armed Robberies of Commercial Establishments within and outside the Eastern District of Virginia.

6. On January 24, 2021, at approximately 1:30 p.m., officers with the Fairfax County PD responded to an armed robbery report at a Macy’s store located at 6400 Springfield Mall, in Springfield, Virginia, within the Eastern District of Virginia. The suspect was described

as being a Black man between 50 and 60 years old, approximately 5'10'', and wearing a brown puffy coat and a white cotton face mask. After entering the store, the suspect approached a store clerk in the Intimates section holding a clothing item. When the clerk opened the cash register, the suspect displayed a gun (which the victim described as being made of wood and metal) and ordered that the clerk give him the money in the register. The clerk complied, and the suspect made off with approximately \$300. Surveillance footage, which captured the suspect entering and exiting the store, shows that the subject was a Black man and was wearing black shoes, blue jeans, a black knit hat, a white face mask, a brown puffy jacket with a white logo on the front left side and on the back right side, and several layers underneath the jacket.

7. On February 11, 2021, at approximately 9:18 p.m., officers with the Alexandria City Police Department responded to an armed robbery report at a McDonald's restaurant located at 505 South Van Dorn Street, in Alexandria, Virginia, within the Eastern District of Virginia. According to a store clerk, the suspect entered the restaurant, placed an order, and then demanded that the clerk give him the money inside the register. The clerk told the suspect that she was unable to open the register because the order was still pending on the register's screen. The subject then walked around to where the clerk was standing by the register, at which time he brandished a wood and metal shotgun while he continued to demand money. After some time, the clerk was able to open the register, and the suspect took bills and coins from inside the register. The suspect exited the restaurant shortly thereafter. Witnesses described the suspect as being a Black man who was approximately six feet and wearing a black hoodie. Surveillance footage shows the suspect removing cash from the cash register as well as holding what appears to be a shotgun with a wooden portion on it. The surveillance video also shows that the suspect was wearing black shoes, blue jeans, a black ski mask, and a puffy brown jacket with a white

North Face logo on the front left side and on the back right side. Notably, the appearance of the suspect's shoes, blue jeans, and jacket were consistent with the appearance of the shoes, blue jeans, and jacket that the suspect of the January 24, 2021 Macy's store robbery was wearing.

8. On February 17, 2021, at approximately 10:26 p.m., officers with the Anne Arundel County Police Department responded to an armed robbery report at an Exxon gas station and convenience store located at 1276 Crain Highway South, in Crofton, Maryland. The suspect was described by a store clerk as being a Black man, approximately 45 to 55 years old, and wearing a black mask and a black hoodie. According to the clerk, the suspect came inside the store and stated that he wanted to buy a box of cigarettes. As the clerk turned around to grab the cigarettes, the suspect pulled out what the clerk described as a "brown gun" and pointed it at the clerk while he demanded money. The suspect also told the clerk not to push the panic alarm or he (the suspect) would shoot him (the clerk). The clerk opened the cash register and gave the suspect approximately \$570, which was placed inside a black shopping bag. The suspect then made the clerk walk toward the back of the store before fleeing on foot. Surveillance footage shows that the subject, wearing a black hoodie with the hood pulled over his head, pointed what appears to be a shotgun with a wooden portion at the clerk while the clerk attempted to open the cash register. The video also shows that the suspect directed the clerk to get down on the floor before demanding that he get up and leave the cash register area. While canvassing the area, Anne Arundel County Police Detectives located video surveillance from neighboring businesses, which shows that, shortly before the robbery, a dark blue, four-door hatchback vehicle drove on a side street by the gas station. The same video shows the same vehicle traveling on the side street toward the gas station just before the suspect left the scene. The video also shows that, after the robbery, the vehicle drove to a parking lot adjacent to the gas station and fled the area.

9. On February 21, 2021, at approximately 7:31 p.m., officers with the Prince George's County Police Department ("Prince George's County PD") responded to an armed robbery report at a Subway restaurant located at 10428 Campus Way South, in Largo, Maryland. The victim stated that the suspect approached him while he was behind the counter and brandished a gun. The subject demanded that the victim open the cash register. The victim complied, and the suspect stole approximately \$500 dollars. The suspect then fled. The suspect was described as a Black man who was approximately six feet and weighed approximately 180 pounds, wearing a black ski mask with white symbols towards the top, a black jacket, a black hoodie, black gloves, black pants, and black shoes. Surveillance footage shows the suspect pointing a rifle with a brown stock at the victim and then climbing behind the counter while the victim opened the register. Significantly, the description of this rifle is consistent with that of the firearm used in the February 17, 2021 armed robbery in Anne Arundel County, Maryland.

10. During a canvass following the robbery, Prince George's County Police Detectives recovered and viewed video surveillance from surrounding businesses. The videos show that the suspect arrived at the restaurant's parking lot and then left the scene in a dark-colored Chevrolet Malibu Maxx. After the robbery, the vehicle pulled around to meet the suspect, who entered the vehicle on the passenger side. The vehicle matched the description of the blue, four-door hatchback that was observed on video surveillance of the February 17, 2021 robbery in Anne Arundel County, Maryland.

11. On February 23, 2021, at approximately 11:34 p.m., officers with the Fairfax County PD responded to an armed robbery report at a Papa John's restaurant located at 5860 Columbia Pike, in Falls Church, Virginia, within the Eastern District of Virginia. Upon investigating this matter, officers learned that two suspects entered the restaurant, and that one of

them (Suspect 1) brandished a sawed-off shotgun at the victim while he demanded that the cash register be opened. According to the victim, the second suspect (Suspect 2) indicated that he had a weapon but never produced one. The suspects made off with approximately \$187 from the business before fleeing the location. Suspect 1 was described as an older Black man who was approximately 5'6", and wearing blue jeans, black shoes, red and white gloves, a gray hoodie, a black hat, a black mask, and a blue jacket with large pockets on the front embroidered in white stitching. Suspect 2 was described as a Black man, who was approximately 5'5", and wearing a black mask, a black hoodie, dark colored pants, and black shoes. Surveillance footage shows that, after entering the restaurant, Suspect 1 walked behind the counter and unsuccessfully tried to open the cash register for several seconds. The victim then walked with both Suspect 1 and Suspect 2 to the back of the store and produced a bag containing cash. The suspects took the bag of cash and exited the restaurant. The surveillance video clearly captures the eyes and other unmasked parts of Suspect 1's face. During the entire incident, Suspect 1 can be seen holding and brandishing what appears to be a sawed-off shotgun with a brown wood stock.

12. On March 7, 2021, at approximately 3:13 p.m., officers from the Prince George's County PD responded to an armed robbery report at the Marathon Gas Station located at 8405 Westphalia Road, in Upper Marlboro, Maryland. The suspect entered the store and brandished a sawed-off shotgun that had distinctive blue tape wrapped around the foregrip of the firearm. The subject then demanded that the store clerk open the cash register and give him all the money inside it. The victim immediately grabbed his phone to dial 911, and the suspect fled the location. The suspect was described as a middle-aged Black man wearing a gray winter skull cap, a black mask, a black hoodie sweatshirt, and jeans with a hole in the left rear calf. Surveillance footage shows the suspect pointing a brown sawed-off shotgun with distinctive blue

tape at the clerk from the other side of a dividing compartment. When they viewed the video, detectives were also able to observe that several minutes before the suspect arrived at the gas station, a dark colored Chevrolet Malibu Maxx drove towards the 8400 block of Westphalia Road.

13. On March 13, 2021 at approximately 5:43 p.m., officers with the Fairfax County PD responded to an armed robbery report at the Domino's Pizza restaurant located at 8133 Watson Street, in McLean, Virginia, within the Eastern District of Virginia. According to the victims, the suspect entered the restaurant carrying a dark colored duffel bag. Once inside the restaurant, he took out from the bag a sawed-off shotgun with distinctive blue tape wrapped around the foregrip of the firearm. The suspect then came around the counter, emptied a cash register, and commanded the employees present to get on the ground. The suspect then ordered the victims to walk towards the back of the restaurant and fled. According to victim accounts, the suspect was a skinny Black man and was wearing a black beanie hat, a black mask, a black hoodie sweatshirt, and black pants. Surveillance video shows the suspect pointing a brown sawed-off shotgun with distinctive blue tape at the restaurant employees. Notably, the appearance of the shotgun is consistent with that of the shotgun used in the March 7, 2021 robbery in Upper Marlboro, Maryland. The video also shows that the suspect was wearing blue Nike sneakers with a white border and bottom. Video surveillance footage from a neighboring business shows that, just prior to the robbery, a dark colored Chevrolet Malibu Maxx hatchback drove by. The suspect is then seen emerging from the area where the vehicle was seen driving. After the robbery, the subject ran towards where the vehicle had driven.

14. All the business establishments described above were engaged in commercial activity and the robbery of each establishment affected interstate commerce.

Recovery of the blue Chevrolet Malibu Maxx hatchback

15. On March 14, 2021, an informational message was put out to officers in the Prince George's County PD for the aforementioned dark colored Chevrolet Malibu Maxx hatchback that had been seen in several surveillance videos. On that same date, at approximately 11:07 a.m., a detective with the Prince George's County PD observed a 2007 blue Chevrolet Malibu Maxx hatchback bearing Maryland temporary registration T0272421 driving in the area of Indian Head Highway, in Prince George's County, Maryland. Officers attempted to conduct a traffic stop on this vehicle, but the vehicle fled and the officers ended their pursuit.

16. Later that same day, at approximately 3:08 p.m., officers with the Prince George's County PD responded to a report of a vehicle accident at 10412 Livingston Road, in Fort Washington, Maryland. When they arrived at the scene, the officers observed a 2007 blue Chevrolet Malibu Maxx bearing Maryland temporary registration TO272421—the same vehicle that officers had attempted to pull over earlier that day. The vehicle was unoccupied and overturned in the woods. Officers observed a sawed-off shotgun with distinctive blue tape on the foregrip on the ground near the vehicle. The vehicle was impounded and transported to the Prince George's County Evidence Facility for further processing.

17. On March 17, 2021, Prince George's County detectives executed a court-ordered search and seizure warrant on the blue 2007 Chevrolet Malibu Maxx bearing Maryland registration TO272421. During the search of the vehicle, officers located and recovered one dark colored LG cellular phone bearing IMEI number 355041-61-614233-2. Officers also recovered a second cellular phone. During their search of the vehicle, the officers also found the following

items: a black knit hat whose appearance was consistent with the one the suspect wore during the March 13, 2021 robbery at the Domino's restaurant in McLean Virginia; a dark-colored bag whose appearance was consistent with the one used during the March 13, 2021 robbery at the Domino's restaurant in McLean Virginia; several rounds of shotgun ammunition; a black face mask; black gloves; drug paraphilia; bank cards with FLEET's name; a vehicle registration card issued to FLEET; and a medical card bearing FLEET's name.

Search of cellular phone and other evidence leading to FLEET's arrest

18. On March 19, 2021, detectives with Prince George's County PD executed a court-ordered search and seizure warrant on the dark colored LG cellular phone bearing IMEI number 355041-61-614233-2 that was recovered from the blue 2007 Chevrolet Malibu Maxx bearing Maryland registration T0272421. Upon searching the phone, detectives found photos and videos of FLEET as well as photos of the blue Chevrolet Malibu Maxx hatchback bearing Maryland temporary registration T0272421. Detectives determined that the phone number associated with the cellular phone was (240) 877-3700 ("the 240 phone number").

19. On Monday, March 22, 2021, detectives with the Fairfax County PD obtained a search warrant for records, including cell site data, pertaining to the 240 phone number. On April 03, 2021, T-Mobile provided records in response to the search warrant. The records reflected that the 240 phone number was subscribed to FLEET.

20. The cell site records for the 240 phone number revealed the cellular phone's approximate location on a variety of dates and times. Significantly, the phone activated cell towers near the location of the following robberies around the time of the robberies:

- The January 24, 2021, armed robbery of Macy's in Springfield, Virginia;
- The February 21, 2021 armed robbery of Subway in Largo, Maryland;

- The March 7, 2021 armed robbery of Marathon gas station in Upper Marlboro, Maryland; and
- The March 13, 2021, armed robbery of Domino's Pizza in McLean, Virginia.

21. As a result of its investigation, Fairfax County PD obtained an arrest warrant for FLEET for the March 13, 2021, armed robbery of the Domino's Pizza in McLean, Virginia.

22. On April 21, 2021, deputies with the United States Marshals Service located FLEET in Northeast Washington, DC. FLEET was arrested and taken into the custody in the District of Columbia. When he was arrested, FLEET was wearing blue Nike sneakers with a white border and bottom, which were consistent with the shoes worn by the suspect of the March 13, 2021 armed robbery at Domino's Pizza. FLEET was also wearing a blue jacket with large pockets on the front embroidered in white stitching, which was consistent with the jacket worn by Suspect 1 during the February 23, 2021, armed robbery of Papa John's.

23. On April 26, 2021, FLEET was extradited to Fairfax County to face charges brought in connection with the March 13, 2021, armed robbery of Domino's Pizza in McLean, Virginia. FLEET has been in Fairfax County custody since his extradition.

24. FLEET is a 61-year-old Black man and is approximately 6'1" tall. In addition to the aforementioned articles of clothing, FLEET's age, height, and facial features match the description of one of the suspects of the robberies. At the time of his arrest, FLEET was on parole for a prior armed robbery charge. FLEET has an extensive criminal history with multiple prior armed robbery convictions.

CONCLUSION

25. Based on the foregoing facts, I submit that probable cause exists to believe that on March 13, 2021, in the Eastern District of Virginia, FLEET used, carried, and brandished a

firearm during and in relation to a crime of violence, namely, Hobbs Act Robbery (18 U.S.C. § 1951), and possessed a firearm in furtherance of such crime of violence, in violation of 18 U.S.C. § 924(c)(1)(A).



William C. Beechum
Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 via telephone this 15th day of June, 2021.



The Honorable Ivan D. Davis
United States Magistrate Judge