



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

Alexandria Division

UNITED STATES OF AMERICA)
)
 v.)
)
 WOSSEN ASSAYE,)
)
 Defendant)

Criminal Case 1:15-mj- 171

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jeffrey M. O'Donnell, being duly sworn, state:

AFFIDAVIT

1. This affidavit is submitted in support of a criminal complaint charging **WOSSEN ASSAYE (ASSAYE)** with the robbery of the Apple Federal Credit Union, in the Alexandria area of Fairfax County, Virginia, on March 20, 2015.

2. The facts and information contained in this affidavit are based upon my training and experience, participation in investigations, personal knowledge and observations during the course of this investigation, as well as the observations of other agents and police officers involved in this investigation. All observations not personally made by me were relayed to me by the individuals who made them or are based on 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. It is not intended to include each and every fact and matter observed by me or known to the United States.

AGENT'S TRAINING AND EXPERIENCE

3. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since August 2011. I am currently assigned to the Violent Crimes Task Force Squad CR-4 which focuses on the Northern Virginia area. I have investigated violent crimes since December 2011. As part of my duties, I have investigated bank robberies, carjackings, kidnappings, fugitive cases, and other crimes of violence.

BACKGROUND

5. Since October 2013, the Washington Field Office of the FBI, the Fairfax County, Falls Church and Alexandria City Police Departments and the Loudon County Sheriff's Office have been conducting a criminal investigation involving a series of twelve bank robberies that have occurred in the Eastern District of Virginia, the most recent of which occurred on March 20, 2015. All of these robberies have occurred within a span of seventeen months, beginning in October 2013.

6. The perpetrator involved in these twelve robberies has followed a similar modus operandi. In a majority of the robberies, the subject enters the bank, often with a cell phone held to his ear, approaches the victim teller and displays a handgun, or displays a demand note, and verbally demands money. After obtaining money, the subject departs the area of the bank on a bicycle. The perpetrator has worn a wide array of clothing during the robberies, to include ski masks, sunglasses and hats in a number of the robberies; however, in several of the robberies the perpetrator's face has been showing.

7. Each of the twelve robberies was captured in bank and commercial establishment surveillance photographs and video recordings. The perpetrator depicted in these photographs

and recordings appears physically similar. Multiple witnesses have described the perpetrator as a thinly built black male.

8. Based upon the similar modus operandi employed by the perpetrators, bank surveillance photographs and video recordings, and witness descriptions, law enforcement officers believe the same individual has committed all twelve robberies. A brief summary of the robberies that have occurred is outlined below:

OCTOBER 22, 2013, ROBBERY IN ANNANDALE, VIRGINIA

9. On October 22, 2013, at approximately 9:28 a.m., an unidentified black male subject entered the M&T Bank, a federally insured financial institution, located at 7857 Heritage Drive, Annandale, Virginia. The subject entered the bank with a cellular phone held to his ear, approached a victim teller and displayed a demand note demanding money. After obtaining money the subject was seen fleeing the vicinity of the bank on a bicycle. The subject was described as a black male, approximately 6'0" tall, approximately 25-30 years old, wearing a grey sports coat, striped white shirt, black fedora hat, aviator type sunglasses, tan pants and white colored shoes. The bank sustained a loss of approximately \$4,436 in U.S. currency as a result of the robbery.

JANUARY 31, 2014, ROBBERY IN OAKTON, VIRGINIA

10. On January 31, 2014, at approximately 12:15 p.m., an unidentified black male subject entered the BB&T Bank, a federally insured financial institution, located at 2941 Chain Bridge Road, Oakton, Virginia. The subject entered the bank with a cell-phone held to his ear, approached a victim teller and presented a demand note which demanded money and stated that he had a gun. The subject received money from the teller, exited the bank and was seen fleeing the vicinity of the bank on a bicycle. The subject was described as approximately 5'10", skinny

build, wearing a black and white zig-zag beanie hat, black square sunglasses, plaid colored scarf, black jacket, black gloves and dark colored pants. The bank sustained a loss of approximately \$984 in U.S. currency as a result of the robbery.

FEBRUARY 4, 2014, ROBBERY IN STERLING, VIRGINIA

11. On February 4, 2014, at approximately 12:46 p.m., an unidentified black male subject entered the Washington First Bank, a federally insured financial institution located at 46901 Cedar Lake Plaza, Sterling, Virginia, entered the bank with what appeared to be a cell-phone held to his ear and approached a victim teller. The subject showed the teller a note which stated he had a gun and demanded money. The subject received cash from the victim teller and exited the bank on foot. The subject was later seen departing the area of the bank on a bicycle. Witnesses described the subject as a black male, approximately 5'10" tall, approximately 130 lbs, wearing a bright orange jacket, brown golf hat, black pants and dark sunglasses. The bank sustained a loss of approximately \$1,000 in U.S. currency as a result of the robbery.

NOVEMBER 14, 2014, ROBBERY IN ANNANDALE, VIRGINIA

12. On November 14, 2014, at approximately 10:30 a.m., an unidentified black male subject entered the same M&T Bank that was robbed on 10/22/2013, located at 7857 Heritage Drive, Annandale, Virginia. The subject entered the bank, approached a victim teller, grabbed a sum of money from a customer who was making a deposit and exited the bank. The subject was seen fleeing the vicinity of the bank on a bicycle. The subject was described as a black male, approximately 6'0" tall, slim build, approximately 20-25 years old, wearing a bright red coat, black hat, and black sunglasses. The bank sustained a loss of approximately \$1,170 in U.S. currency as a result of the robbery.

NOVEMBER 20, 2014, ROBBERY IN ALEXANDRIA, VIRGINIA

13. On November 20, 2014, at approximately 10:53 a.m., an unidentified black male subject entered the SunTrust Bank, a federally insured financial institution, located at 4616 Kenmore Ave, Alexandria, Virginia. The subject entered the bank with a cell-phone to his ear, approached a victim teller at the first teller station and displayed a dark colored handgun in his left hand and verbally demanded money stating "Give me the hundred." The subject received cash from the victim teller and then fled the bank on foot. The subject was described as a black male, approximately 5'11" tall, slim build, with a slight goatee, wearing sunglasses, an oversized orange or burgundy winter coat, black jeans and black knit cap. The bank sustained a loss of approximately \$1,128 in U.S. currency as a result of the robbery.

NOVEMBER 24, 2014, ROBBERY IN STERLING, VIRGINIA

14. On November 24, 2014, at approximately 3:57 p.m., an unidentified black male subject entered the Washington First Bank, a federally insured financial institution located at 46901 Cedar Lake Plaza, Sterling, Virginia. The subject approached a victim teller and verbally implied that he had a gun and demanded hundreds and fifties from the teller. The subject received cash from the victim teller, exited the bank on foot and was later seen exiting the area of the bank on a bike. The subject was described as a black male, approximately 5'9" tall, thin build, wearing a jean jacket, black colored ski mask and white and black sneakers. The bank sustained a loss of approximately \$757 in U.S. currency as a result of the robbery.

NOVEMBER 26, 2014, ROBBERY IN RESTON, VIRGINIA

15. On November 26, 2014, at approximately 2:43 p.m., an unidentified black male subject entered the President's Bank, a federally insured financial institution, located at 167 Reston Parkway, Reston Virginia. The subject entered the bank, approached a victim teller and verbally demanded money stating "Give me all the money and no one gets hurt." The subject

received cash from the victim teller and then fled the bank on foot. The subject was described as a black male, approximately 5'9" tall, slim build, wearing a dark colored beanie style ski mask, black waist length jacket, white t-shirt, and dark colored pants. Additionally, the victim teller described the subject as having an African accent, possibly Ethiopian. The bank sustained a loss of approximately \$1,101 in U.S. currency as a result of the robbery.

DECEMBER 1, 2014, ROBBERY IN ANNANDALE, VIRGINIA

16. On December 1, 2014, at approximately 2:15 p.m., an unidentified black male subject entered the same M&T Bank that was robbed on 10/22/2013 and 11/14/2014, located at 7857 Heritage Drive, Annandale, Virginia. The subject entered the bank, approached a victim teller, displayed a dark colored handgun and verbally demanded money. The subject received cash from the victim teller and then fled the bank on foot. He was later observed fleeing the area of the bank on a bicycle. The subject was described as a black male, approximately 5'10" tall, approximately 20-30 years old, slender build, wearing a blue and grey jacket and black ski mask. The bank sustained a loss of approximately \$1,020 in U.S. currency as a result of the robbery.

DECEMBER 12, 2014, ROBBERY IN ALEXANDRIA, VIRGINIA

17. On December 12, 2014, at approximately 12:53 p.m., an unidentified black male subject entered the Burke and Herbert bank, a federally insured financial institution, located at 155 North Paxton Street, Alexandria, Virginia. The subject entered the bank, approached a victim teller, displayed a dark colored handgun and verbally demanded money stating "Give me the money, Give me more." The subject received cash from the victim teller and then fled the bank on foot. He was later observed fleeing the area of the bank on a bicycle and getting into a white four door vehicle. The subject was described as a black male, approximately 5'10" tall,

medium build, wearing a brownish colored puffy jacket and black knit cap. The bank sustained a loss of approximately \$5,794 in U.S. currency as a result of the robbery.

FEBRUARY 2, 2015, ROBBERY IN ALEXANDRIA, VIRGINIA

18. On February 2, 2015, at approximately 11:37 a.m., an unidentified black male subject entered the BB&T bank, a federally insured financial institution, located at 7960 Fort Hunt Road, Alexandria, Virginia. The subject entered the bank, approached a victim teller, displayed a demand note implying he had a weapon and demanded money. The subject received cash from the victim teller and then fled the bank on foot. The subject was later observed fleeing the area of the bank on a bicycle. The subject was described as a black male, approximately 6'1" tall, slim build, wearing a grey hat and black jacket. As the subject entered the front of the bank he pulled a black "north face" headband over his mouth to conceal his face. The bank sustained a loss of approximately \$2,832 in U.S. currency as a result of the robbery.

FEBRUARY 21, 2015, ROBBERY IN FALLS CHURCH, VIRGINIA

19. On February 21, 2015, at approximately 10:06 a.m., an unidentified black male subject entered the Apple Federal Credit Union, a federally insured financial institution, located at 1118 West Broad Street, Falls Church, Virginia. The subject entered the credit union, approached a victim teller, displayed a dark colored handgun in his left hand and verbally demanded money. The subject received money from the teller and exited the credit union on foot. The subject was described as approximately 6'0" tall, skinny build, wearing a black beanie, black ski mask covering the entire face, navy or black colored puffy jacket, black jeans and black gloves. Following the robbery, video surveillance was obtained by law enforcement officers from an adjacent commercial institution. An individual, matching the same description of the

subject was observed riding a bicycle just prior to, and after the time of the robbery. The credit union sustained a loss of approximately \$9,963 in U.S. currency as a result of the robbery.

MARCH 20, 2015, ROBBERY IN ALEXANDRIA, VIRGINIA

20. On March 20, 2015, at approximately 11:04 a.m., an unidentified black male subject entered the Apple Federal Credit Union, a federally insured financial institution, located at 6831 Sir Viceroy Drive in the Alexandria area of Fairfax County, Virginia. The subject entered the credit union with a phone to his ear, approached a victim teller, displayed a dark colored handgun and verbally demanded money. The subject received money from the teller, exited the credit union on foot and was witnessed fleeing the area on a blue bicycle. The subject was described as a black male, approximately 5'11" - 6'0" tall, slender build, wearing a grey knit cap, black jacket, black fleece headband and black pants. The credit union sustained a loss of approximately \$1,808 in U.S. currency as a result of the robbery.

INVESTIGATION

21. On December 9, 2014, law enforcement officers obtained a court authorization from this Court ordering multiple cellular service providers to disclose "tower dump" information to investigators, to include all records and other information (not including the contents of communications) about all communications made using cell towers during certain timeframes. These specified timeframes corresponded with the date time groups of the aforementioned bank robberies.

22. On January 12, 2015, SPRINT SPECTRUM LP provided information to the FBI for analysis. A detailed analysis of the tower dump information showed that telephone number (703) 655-7897 made contact with SPRINT SPECTRUM cellular towers located in the vicinity of several of the bank robberies outlined in this affidavit.

23. On January 13, 2015, investigators conducted a query of law enforcement databases for **(703) 655-7897**. Results of the query showed an individual by the name of **WOSSEN ASSAYE**, black male, date of birth 05/20/1972, of Ethiopian descent, as being associated with the number. An FBI criminal history check shows **ASSAYE** being charged with, and subsequently convicted for, multiple statutory burglary and robbery offenses that occurred during the 1998-1999 timeframe in Alexandria, Virginia. As a result, **ASSAYE** was imprisoned from 2000 to May of 2013; he is currently on probation in Arlington County. Booking photos of **ASSAYE** obtained by investigators closely resembled the physical characteristics of the robbery subject seen in video/still surveillance footage and described by witnesses at several of the aforementioned Northern Virginia bank robberies.

24. On January 14, 2015 and February 12, 2015, investigators met with **ASSAYE's** probation officer (PO) in Arlington, VA. According to the PO, **ASSAYE** provided telephone number **(703) 655-7897** as his most recent cellular telephone number and a home address of 4300 North Carlin Springs Road, Apartment #406, Arlington, Virginia, a known resident for **ASSAYE's** father. The PO has conducted several home visits at the aforementioned address as a requirement of **ASSAYE's** supervision. The PO also told agents that **ASSAYE** told him that he (**ASSAYE**) has a girlfriend/fiancée and that he spends a significant amount of time with her.

26. On January 22, 2015, law enforcement officers obtained a court authorization from this Court ordering SPRINT SPECTRUM to provide subscriber information and call detail records, with cell-site location, to investigators for telephone number **(703) 655-7897** for the period of October 1, 2013, to January 20, 2015. Subscriber information for the number came back to **WOSSEN ASSAYE**. A detailed analysis of call detail records showed that the device associated with telephone number **(703) 655-7897** made contact with cellular telephone towers

located in the vicinity of the following five bank robberies at times prior to and after, in some cases, the following five bank robberies:

- (1) **01/31/2014**, approximately 12:15 p.m., BB&T Bank located at 2941 Chain Bridge Road, Oakton, Virginia;
- (2) **11/20/2014**, approximately 10:53 a.m., SunTrust Bank located at 4616 Kenmore Ave, Alexandria, Virginia;
- (3) **11/24/2014**, approximately 3:57 p.m., Washington First Bank located at 46901 Cedar Lake Plaza, Sterling, Virginia;
- (4) **11/26/2014**, approximately 2:43 p.m., Presidents Bank located at 1675 Reston Parkway, Reston, Virginia; and
- (5) **12/12/2014**, approximately 12:53pm., Burke and Herbert Bank located at 155 North Paxton Street, Alexandria, Virginia.

27. Analysis of the call details records also revealed thousands of contacts between telephone number **(703) 655-7897** and telephone number **(571) 275-3277**. A law enforcement database check for telephone number **(571) 275-3277** revealed that phone number being associated with EMILY WILLIAMS, date of birth 02/10/1971, address 4130 3rd Road North, Apartment #2, Arlington, Virginia. A DMV records check for WILLIAMS revealed the same aforementioned address as being associated with WILLIAMS.

28. On February 12, 2015, investigators spoke with the Assistant Property Manager at the Gates of Ballston Apartments, the company responsible for managing the apartments located at 4130 3rd Road North, Arlington, Virginia. The manager said that EMILY WILLIAMS, an Asian female, is the current lessee of Apartment #2, 4130 3rd Road North, Arlington, Virginia. The manager also said that WILLIAMS has a 1995 Volvo registered with the management

office. Furthermore, the manager said that she often observes a tall, thin, black male who she believes is of Ethiopian descent, in the company of WILLIAMS when she comes to visit the management office.

29. On February 27, 2015 and March 3, 2015, while conducting physical surveillance, agents observed a black male matching the physical description of ASSAYE departing the structure identified as 4130 3rd Road North, Arlington, Virginia. On both occasions, ASSAYE was accompanied by an Asian female matching the physical description of WILLIAMS. Both individuals were observed occupying a black Volvo sedan. Agents also observed ASSAYE driving the vehicle. A DMV records checked showed that vehicle as being registered to WILLIAMS, who investigators believe is ASSAYE's girlfriend/fiancée.

MARCH 20, 2015, ARREST OF WOSSEN ASSAYE

30. On March 20, 2015, immediately following the robbery of the Apple Federal Credit Union in the Alexandria area of Fairfax County, Virginia, agents began conducting physical surveillance at The Carlin apartment building (4300 North Carlin Springs Road, Arlington, Virginia), as well as at the Gates of Ballston apartment building (4130 3rd Road North, Arlington, Virginia).

31. Approximately ninety minutes after the robbery, agents observed the aforescribed black Volvo sedan drive up the front of The Carlin apartment building. An individual resembling ASSAYE exited the vehicle and entered The Carlin. ASSAYE was wearing items of clothing similar in appearance to those worn by the suspect involved in a number of the previous bank robberies described, namely a dark colored puffy jacket. A short while later, ASSAYE was observed departing the front entrance of The Carlin and getting into

the front passenger seat of the Volvo. (These agent observations were later corroborated when agents reviewed surveillance video from The Carlin for March 20, 2015.)

32. Once the Volvo departed from The Carlin apartment building, agents conducted mobile surveillance of the vehicle and observed it drive into a CVS pharmacy parking lot located in Falls Church, Virginia. After the vehicle parked in the CVS lot, agents observed ASSAYE exit the front passenger seat of the vehicle, an Asian female, resembling WILLIAMS, exit the driver's seat of the vehicle, and another black male, later identified as Brian PULLER, exit the rear passenger seat of the vehicle. Agents then observed ASSAYE, WILLIAMS, and PULLER enter the CVS. When the three individuals came out of the CVS, agents observed WILLIAMS enter the Volvo while ASSAYE and PULLER walked to the trunk area of the vehicle. Agents then observed ASSAYE open the trunk, remove a dark colored pair of pants and a dark colored jacket from the trunk, place the pants and jacket into a draw-string bag, and then place the bag back inside the trunk. In addition, agents observed ASSAYE take out of the trunk a brown paper bag, which appeared to be wrapped around an object approximately the size of a shoe box, and then return that object back to the trunk. ASSAYE was also observed handling what appeared to be multiple license plates in trunk area of the vehicle.

33. Once the vehicle departed from the CVS parking lot, agents continued their mobile surveillance of it. While following and surveiling the vehicle, agents observed it driving erratically in hazardous, rainy driving conditions. In particular, the vehicle was observed reaching speeds in excess of approximately one hundred miles per hour and jumping a median located in the middle of the road. Based on my training and experience, I believe this driving behavior was an effort to elude the agents conducting surveillance of the vehicle.

34. At approximately 3:15 p.m., approximately one hour after agents lost visual contact with the black Volvo due to its excessive speed and evasive driving, agents conducting static surveillance at The Carlin apartment building observed it with three occupants drive into the rear parking lot of The Carlin. The same three individuals observed earlier, ASSAYE, WILLIAMS, and PULLER, were observed occupying the vehicle at this time. Agents arrested ASSAYE, who at the time of the arrest was located in the front passenger seat of the vehicle. A search of ASSAYE's person incident to the arrest resulted in the seizure of approximately \$1600 in U.S. currency from a zipper purse, which was located in his left jacket pocket. The Apple Federal Credit Union robbery on that date netted the robber \$1808 in U.S. Currency. (Later that day, the Honorable Theresa C. Buchanan, United States Magistrate Judge, United States District Court for the Eastern District of Virginia, issued a criminal complaint in the case *United States v. Wossen Assaye* (1:15-mj-163), charging ASSAYE with possession of a firearm in furtherance of a crime of violence, in violation of 18 U.S.C. § 924(c).)

CONCLUSION

35. Based on the foregoing, I believe probable cause exists to conclude that WOSSEN ASSAYE has violated 18 U.S.C. § 2113(a), robbery of the Apple Federal Credit

Union, in the Alexandria area of Fairfax County, Virginia, on March 20, 2015, and I respectfully request the issuance of a complaint and arrest warrant charging him with that offense.



Jeffrey M. O'Donnell
Federal Bureau of Investigation

SWORN TO AND SUBSCRIBED BEFORE ME THIS 23th DAY OF MARCH 2015.

_____/s/_____
 Michael S. Nachmanoff
United States Magistrate Judge

Honorable Michael S. Nachmanoff
United States Magistrate Judge