AO 91 (Rev. 11/11) Criminal Complaint

AUSA Theodora Anderson (815) 987-4444

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

FILED

UNITED STATES OF AMERICA

CASE NUMBER: 24 CR 503

MAY 07-2024

v.

PETER SOVA

CLERK, U.S. DISTRICT COURT THOMAS G. BRUTON CLERK, U.S. DISTRICT COURT

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 May 6, 2024, at McHenry, in the Northern District of Illinois, Western Division, the defendant(s) violated:

Code Section

Offense Description

Title 18, United States Code, Section 2113(a)

by force and violence, and by intimidation, took from the person and presence of another property and money belonging to and in the care, custody, control, management, and possession of U.S. Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

AARON CAVAZOS

Special Agent, Federal Bureau of Investigation (FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: May 7, 2024

Judge's signature

City and state: Chicago, Illinois MARIA VALDEZ, U.S. M

MARIA VALDEZ, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

- I, AARON CAVAZOS, being duly sworn, state as follows:
- 1. I am a Special Agent with the Federal Bureau of Investigation (FBI) Chicago Division, Rockford Resident Agency, and have been employed by the FBI as a Special Agent since approximately January 2021. My current responsibilities as a special agent include the investigation of violent crimes, including, among others, kidnapping, bank robbery, and the apprehension of violent fugitives.
- 2. This affidavit is submitted in support of a criminal complaint alleging that Peter Sova has violated Title 18, United States Code, Section 2113(a). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging SOVA with Bank Robbery, 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 information provided to me by other law enforcement officers, including law enforcement officers from the McHenry Police Department (hereinafter "MPD").
- 4. On or about May 6, 2024, MPD officers responded to Huntington Bank, located at 5555 West Bull Valley Road, McHenry, Illinois, for a report of a bank robbery. Upon arrival, a Huntington Bank teller described the robber as a male,

wearing a hooded sweatshirt and black gloves. The teller stated the robber entered the bank, approached the teller's station, presented the teller with a note that stated: "This is a robbery. Please give me your money in 10 seconds." The robber then pointed to a bag and lifted it, showing the teller what they believed was the muzzle of a firearm. In response to the note and the robber's actions, the teller provided the robber with \$4,895 United States Currency. The robber then left the bank on foot, running east from the bank.

- 5. On May 6, 2024, shortly after the robber fled the bank, MPD responded to the scene along with a McHenry County Sherriff's Office K-9. The K-9 officer was able to track the robber's flight path to a wood line southeast of Huntington Bank. The K-9 started the track at Huntington Bank. The K-9 then continued to track south towards a wooded area. Law enforcement officers then observed the suspect, later identified as Peter SOVA, exit the wood line carrying a bag, which he immediately dropped when he saw officers, and then began to walk away from the bag. Law enforcement officers made contact with SOVA and he asked, "Have you caught the bank robber yet?". The bag was dropped approximately 20 feet from where SOVA was detained. An initial check of the bag showed the contents to be United States Currency with Huntington Bank-labeled currency straps. The amount of cash was later determined to be \$4,895 United States Currency.
- 6. Officers obtained surveillance footage of the robbery from Huntington Bank and observed the robber to be a white male, approximately 6'4, approximately

40 to 50 years old. The robber was wearing an oversized hoodie, sunglasses, gloves, and cream-colored pants.



7. The K-9 officer continued to track the robber's flight path, which ended where SOVA was taken into custody. Approximately 50 yards from where SOVA was detained, law enforcement officers located a blue bag containing sunglasses, two sweatshirts, and another empty darker blue bag stuffed inside the bottom. Based on review of screenshots taken from the surveillance video from the Huntington Bank robbery on May 6, 2024, MPD officers believe the clothing located in this bag matches the clothing worn by the robber.

- 8. SOVA was taken into custody and agreed to speak to law enforcement officers after being advised of his *Miranda* rights. During his interview, SOVA denied robbing the bank. SOVA indicated that at the time he was taken into custody, he had left his nine-month-old son alone at his residence on Ross Avenue to go and get cigarettes from a BP gas station located just east of Huntington Bank. SOVA indicated that he did not have his wallet on him at the time of his arrest.
- 9. I have reviewed screen shots from surveillance video from the Huntington Bank robbery on May 6, 2024, and based upon my review, I believe Peter SOVA's physical appearance and stature is consistent with the robber of the Huntington Bank.
- 10. On May 6, 2024, Huntington Bank's deposits were insured by the Federal Deposit Insurance Corporation (FDIC). Huntington Bank's FDIC number was 6560 at the time of the robbery.

11. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that on or about May 6, 2024, at Rockford, Illinois, in the Northern District of Illinois, Western Division, Peter SOVA, by force and violence, and by intimidation, took from the person and presence of another, any property and money belonging to, and in the care, custody, control, management, and possession of U.S. Bank, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT.

AARON CAVAZOS

Special Agent, Federal Bureau of Investigation

SWORN TO AND AFFIRMED by telephone May 7, 2024.

Honorable Maria Valdez

Mania

United States Magistrate Judge