

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States Courts
Southern District of Texas
FILED

December 18, 2025

Nathan Ochsner, Clerk of Court

United States of America)

v.)

Darius Dshun Alexander)
Amon Alexander)
Willie Earl Boyd)

Case No.

4:25-mj-770

Defendant(s)

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 the date(s) of November 15, 2025 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

USC 18 1951(a) and 2
USC 18 924(c) (1)(A)(ii) and 2

Aiding and Abetting interference with Interstate Commerce by Robbery
Aiding and Abetting Brandishing a Firearm During and in Relation to a Crime
of Violence

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.



Complainant's signature

Ryan Hiltz, TFO

Printed name and title

Sworn to before me via telephone.

Date: December 18, 2025



Judge's signature

Yvonne Ho, United States Magistrate Judge

Printed name and title

City and state: Houston, Texas

4:25-mj-770

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Ryan Hilz, being duly sworn, do hereby depose and state:

1. I am a Task Force Officer with the Federal Bureau of Investigation (hereafter “FBI”) and an Investigator with the Harris County Sheriff’s Office (hereafter “HCSO”) and have been employed by HCSO since November 2012. During my employment with HCSO and the FBI, I have been trained in investigations relating to violations of the United States Federal Criminal Code, including Title 18 of the United States Code (hereafter “USC”), specifically criminal violations involving organized crime, aggravated robbery, bank robbery, interference with commerce by threats or violence, and aggravated assaults. I am currently assigned to the Houston Division of the FBI, Violent Crime Task Force (hereafter “VCTF”), and have been since June 2020. My primary investigative responsibilities include crimes occurring within the Southern District of Texas.

2. The facts contained in this affidavit are based upon information provided to me by other law enforcement officers, and witnesses. Since this affidavit is made for the limited purpose of supporting a Criminal Complaint, I have not set forth each and every fact learned during the course of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crimes charged. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part only.

3. On Saturday, November 15, 2025, at approximately 8:19am, Affiant was contacted by Lance Sides, an employee with Brink's Corporate Security, who advised a Brink's Armored truck was just robbed at gun point in front of H-Mart, located at 23119 Colonial Parkway, Katy, Harris County, Texas and within the Southern District of Texas. Mr. Sides advised Affiant of the initial information, reporting two armed subjects overtook the courier, entered the armored truck and took cash.

4. While Affiant was enroute to the scene, Deputy S. Martinez with the Sheriff's Office advised over the radio that he had identified the suspect vehicle's license plate using FLOCK Safety System as Texas license plate WFV2638. Affiant was additionally notified while enroute that units with the Precinct 5 Constables Office had located the suspect vehicle in the back parking lot of a Residence Inn, located at 1550 Barker Cypress Road, Houston, Harris County, Texas. Affiant then rerouted and began traveling to the Residence Inn. Upon arriving at the Residence Inn, your Affiant observed a white Hyundai Accent, bearing Texas license plate WFV2638, parked in a parking stall facing east. Affiant conducted an NCIC/TCIC check of the vehicle's license plate and found the vehicle is registered to a female subject identified as Christin Camille Thurman, hereinafter referred to as Thurman. Affiant observed dark tint applied to the back window, the exterior of the window, as well as damage to the rear driver side bumper. Affiant entered the hotel and began reviewing surveillance video with Deputy C. Ruiz.

5. While reviewing surveillance video, Affiant also searched the Hyundai's license plate through the FLOCK Safety System, from approximately November 15, 2025 12:00am through 9:00am. Affiant found multiple FLOCK scans between approximately 4:15am and 8:14am. One of the scans found was at approximately 6:34:50am, by FLOCK camera 'DB15 - Collingsworth (WB) from Broyles. Affiant also found a FLOCK scan at approximately

7:48:13am by FLOCK camera '#05 Mercantile Pkwy @ Grand Pkwy EB', and the last scan at approximately 8:14:23am, by FLOCK camera 'DA18 – Barker Cypress (NB) From I-10'.

Affiant searched FLOCK camera 'DB15 – Collingsworth (WB) from Broyles' from approximately 6:33am and 6:35am. At approximately 6:34:53am, Affiant observed a two tone (black over silver) Cadillac CTS, bearing Texas license plate WSF6471, scanned by the above listed camera. Affiant knows from training and experience that during robberies suspects will use a second vehicle as a "follow" vehicle to act as a lookout and to later assist with transporting the suspects from the scene or secondary scene.

6. Affiant searched the Cadillac's license plate through the FLOCK Safety System and found multiple scans for the Cadillac in the same areas as the Hyundai Accent prior to the robbery. Affiant then found the Cadillac scanned at approximately 8:20:14am by FLOCK camera 'DA18 – Barker Cypress (NB) From I-10'. While reviewing the surveillance video from Residence Inn, Affiant observed the Hyundai enter the Residence Inn parking lot from Barker Cypress Road at approximately 8:24am and drive to the back of the hotel. At approximately 8:29am, the above listed Cadillac enters the parking lot and also drives to the back of the hotel. At approximately 8:31am the Cadillac then exits the parking lot onto Barker Cypress Road and leaves the area.

7. Affiant went to the original scene, located at 23119 Colonial Parkway, Katy, Harris County, Texas, where he met with the Victim, identified as Bobby Salcido (herein after Victim). According to Victim, he was assigned to another courier's route that day after the courier took off work. Victim stated he left the Brinks Branch, located at 11777 South Sam Houston Parkway West, Houston, Harris County, Texas, at approximately 7:20am, and drove to the H-Mart in Katy, which was the first stop of the day. Victim stated he took the Sam Houston

Parkway to the Katy Freeway to get to H-Mart. Victims stated he was the only person on the truck that day and was conducting the route as a one-man truck. Victim stated he entered H-Mart to conduct a cash pick up and as he was returning to the Brinks truck, he observed a white car parked in front of the truck. According to Victim, as he was entering the truck and attempting to pull the door shut, he felt resistance and the door get pulled open. Victim stated as he turned around, he began to reach toward his assigned pistol, and he heard a voice tell him not to touch it. Victim stated his assigned pistol was removed from his holster, and he was ordered to lay on the ground. Victim stated the keys to the truck were ripped off his vest and one subject entered the truck while the other remained outside the truck, holding him at gun point. After a short time, the suspects returned to the vehicle and fled the scene, taking his assigned pistol with them. The stolen pistol is an FN 509 9mm, serial number BUS15385.

8. Affiant reviewed surveillance video from the H-Mart shopping center which captured the robbery, as well as surveillance video from the Brinks truck. While reviewing the surveillance video, which corroborated Victim's account of what happened, Affiant observed the driver of the white Hyundai Accent (hereafter Driver), and a male in the rear passenger seat (hereafter Passenger) exit the vehicle as Victim returned to the truck. Affiant observed both suspects brandishing what appeared to be AR style rifles. Affiant also observed Driver carrying a black duffel style bag. Both suspects approached Victim and pulled the side door of the truck open, appearing to hold Victim at gun point. Affiant observed what appeared to be Driver remove the pistol from Victim's holster and hand it to Passenger. Affiant observed Driver enter the truck while Passenger remained outside with Victim, who was lying face down on the ground, with a rifle pointed at him. Affiant observed Driver enter the truck and proceed into the

rear vault of the truck where cash is kept that is being delivered. After a short time, Driver reappeared, exited the truck and the suspects returned to the vehicle and fled the scene.

9. Affiant conducted a NCIC/TCIC search of the Cadillac's license plate and found the vehicle is registered to a male subject, identified as DARIUS Dshun Alexander, hereinafter referred to as DARIUS. Affiant also found the previous owner of the Cadillac was listed as Mario Used Cars, out of Pasadena, Texas. Affiant searched the license plate for the Cadillac through the NVLS database, which is a license plate reader program. Affiant found on November 12, 2025, at approximately 10:38:56am, the Cadillac was scanned while parked inside the apartment complex located at 16350 Ella Boulevard, Houston, Harris County, Texas. In the scan photo, Affiant observed the Hyundai Accent was parked in the parking stall directly next to the Cadillac.

10. Affiant conducted a search of the Hyundai's license plate through the Harris County LENS System and found on May 8, 2025, Thurman contacted the Harris County Sheriff's Office to report the vehicle stolen. The call was cancelled due to the vehicle having been reported as being repossessed. During the follow up investigation, Affiant found Thurman's current address to be 16350 Ella Boulevard, apartment 1034, Houston, Harris County, Texas.

11. Affiant searched DARIUS'S name and date of birth through the LeadsOnline database and found that DARIUS had completed a transaction on September 24, 2025 at Houston Scrap Metal. The Houston Scrap Metal transaction report included photos taken during the transaction. Affiant reviewed the photos and observed a photo of DARIUS wearing a white muscle shirt, DARIUS' driver's license, and the vehicle DARIUS used during the Houston Scrap Metal transaction which appears to be the same white Hyundai Accent used during the armored truck robbery due to the vehicle's visible distinct damage. Affiant reviewed all photos provided

by Houston Scrap Metal and observed the driver of the white Hyundai Accent vehicle used to transport the scrap to be DARIUS wearing a white muscle shirt. Affiant also learned during this transaction DARIUS provided his phone number again as 832-879-8468. Affiant found DARIUS provided this same phone number in other previous pawn transactions.

12. During the follow up investigation, the license plate for the Cadillac was searched through the FLOCK Safety System through the month of November. Affiant reviewed FLOCK images taken on November 8, 2025 that captured the above listed Hyundai and Cadillac driving around the Houston area in tandem.

13. On Monday, November 17, 2025, Officers with the Houston Police Department, as well as Agents with the Department of Public Safety and Detectives with the Harris County Sheriff's Office began conducting surveillance on the Cadillac CTS. While conducting surveillance on the vehicle, DARIUS was observed driving the Cadillac and met up with a white Nissan Sentra, and the two vehicles began following in tandem with each other. Affiant was advised by Sergeant K. Richards with the Houston Police Department, that while following the Cadillac, it was dropped off at a tint shop and DARIUS got into the Nissan Sentra and left the tint shop. According to Sergeant Richards, troopers with the Department of Public Safety conducted a traffic stop on the Nissan Sentra. During the traffic stop, DARIUS was identified as the driver. The front seat passenger was identified as DARIUS' cousin, AMON Alexander, date of birth 09/27/2003 (herein after AMON). During the search of the vehicle, AMON was found to be in possession of \$5,000 in cash in all \$20.00 bills. During the traffic stop, AMON provided his phone number as 346-228-7009. An Instagram account for Amon was identified as '2csamon'. Affiant observed pictures posted to AMON'S Instagram account on November 16,

2025, the day after the robbery, which show AMON posing in photos with a large amount of cash.

14. During the follow up investigation, Affiant was advised by Officer J. Black with the Houston Police Department that he went to Mario Used Cars and spoke with the Loss Prevention Manager, identified as Joanna Palacios, who advised him that the Cadillac was purchased from their dealership. Ms. Palacios further advised the vehicle is equipped with a tracking device, which was installed and accessible to the dealership to locate the vehicle should the buyer default on payments. According to Officer Black, Ms. Palacios provided him with historical GPS pings for November 15, 2025 for the Cadillac.

15. Officer Black later reviewed the pings both before and after the robbery and advised he found the vehicle stopped at Fuel and Food Mart, located at 4002 Lockwood Drive, Houston, Harris County, Texas, at approximately 6:27am. Officer Black advised he was able to recover surveillance video from Fuel and Food Mart, which captured the Cadillac arriving at the location. The surveillance video also captured DARIUS entering the store, as well as another black male who was with DARIUS in the Cadillac. Surveillance video captured DARIUS enter the store wearing black pants, black shoes with a silver in color tab on the top, and a black t-shirt. The video also captured the unknown black male subject enter the store wearing a black hoodie, black pants and black shoes. Surveillance video also shows a white in color Jordan style logo on the left leg of the unknown black male's pants.

16. Affiant was advised by Sergeant Richards that prior to going to the Fuel and Food Mart, the vehicle was at a residence located at 5209 Crane Street, Houston, Harris County, Texas. According to Officers with CAT, a research of 5209 Cane Street identified a male subject associated with that address named WILLIE Boyd (herein after WILLIE), date of birth

11/14/1992, who was showing to have an active warrant for his arrest. According to Sergeant Richards, he along with officers from CAT conducted surveillance of the residence at 5209 Cane Street and on Wednesday, November 19, 2025, WILLIE was arrested for his outstanding arrest warrant and booked into the Harris County Jail. During his arrest, WILLIE provided Trooper Celestine, with the Department of Public Safety, with his phone number, 346-221-7134.

17. Affiant compared WILLIE'S known AFIS photo to the surveillance video from Fuel and Food Mart and observed WILLIE to have a same or similarly shaped face, and nose as that of the unknown black male suspect. Affiant also observed WILLIE to have the same or similar facial hair as that of the unknown black male suspect in the surveillance video from Fuel and Food Mart. Additionally in the surveillance video from Fuel and Food Mart, Affiant observed the unknown black male suspect wearing the same or similar clothing including a white in color "Air Jordan" logo on the left pant leg, this is the same as the male captured on the Brinks surveillance video during the robbery. WILLIE Boyd is believed to be the previously unknown suspect.

18. During the follow up investigation, Affiant obtained search warrants for DARIUS, AMON and WILLIE'S Historical Call Detail Records. The warrants were signed by Harris County District Judges. All three search warrants were served to AT&T Wireless. Affiant received the records for each of the phone numbers which were mapped and all three phones were found to connect to cell towers which service the Brink's Branch, located at 11777 S Sam Houston Parkway W, Houston, Harris County, Texas, prior to the robbery. Affiant knows this location to be the same branch where the armored truck left from the morning of the robbery. Affiant found AMON and WILLIE'S phones are on what is consistent with an open line call before, during and after the robbery. All three phones then show to move northbound along the

Sam Houston Parkway, consistent with the time the armored truck left the branch. All three phone show to move northbound, then proceed westbound on Katy Freeway. All three phones show to connect to towers which service H-Mart and the surrounding area that is consistent with the time the armored truck arrived at H-Mart, and remain connected to those towers during the time of the robbery. All three phones show to then move eastbound along Katy Freeway after the robbery and connect to towers which service the Residence Inn and the surrounding area during the times that are consistent with the Hyundai Accent and the Cadillac arriving at the Residence Inn after the robbery then leaving the parking lot in Cadillac, abandoning the Hyundai Accent.

19. During the follow up investigation, surveillance video was also obtained from the Valero Gas Station, located at 13155 Katy Freeway, Houston, Harris County, Texas, which captured the Cadillac pulling into the parking lot approximately five minutes after the Cadillac left the Residence Inn. Surveillance video captured AMON exit the front passenger seat of the Cadillac, then enter and exit the store. Surveillance video also captured DARIUS exit the driver's seat of the Cadillac, then enter and exit the store after making a purchase. In the surveillance video, DARIUS can be seen wearing the same or similar black shoes with the silver color tab near the toe, as the shoes worn by the suspect who exited the rear passenger side door of the Accent during the robbery.

20. Affiant searched the above listed phone numbers through the Securus Jail Call System and found a jail call recording from November 15, 2025 at approximately 10:05am. Affiant found this to be approximately two hours after the robbery. The call was made to the phone by an inmate, identified as Amari Alexander, AMON'S brother. Affiant listened to the call and heard AMON sound very excited, stating he wished he could video call Amari. AMON states, "We fucked them people up on this!" AMON continued during the call stating he is back,

and he was going to go up on the gram on someone. During the call Amari is heard asking AMON what does it look like and then asks AMON what is the number. AMON responds, "Its like a seven 0." AMON then states to Amari, "The first one, WILLIE was scared." AMON then states in the call, "DA boy! DA got a bad mother, DA got like a three 0 hit. DA got like three 0." AMON then states, "I got a dime." I know from my experience with investigating robberies, a "dime" is often used as a slang word for \$10,000. As the call continued, AMON is heard telling Amari that, "It was too easy!"

21. Affiant continued to review additional calls and found on November 17, 2025, at approximately 5:38pm, after the time of the traffic stop where AMON was identified and during the call with Amari, AMON is heard telling him about the traffic stop and being detained by the Troopers. AMON stated during the call he had \$5,000 cash on him and told the Troopers during the stop that he is a signed artist. AMON is later heard during the call telling Amari that "DA" had like an ounce of marijuana on him. As the call continued, AMON is heard telling Amari, "DA looked at me scared, he said I got that gun in that backpack!"

22. On Friday, December 12, 2025, Pocket Arrest Warrants were obtained for DARIUS, AMON and WILLIE, which were presented to Harris County District Judge D. Lacayo. Judge Lacayo reviewed and signed the arrest warrants.

23. On Tuesday, December 16, 2025, DARIUS was arrested at his place of employment. AMON was arrested at his residence at 5014 Salina Street, Houston, Harris County, Texas, and WILLIE was arrested at his residence at 5209 Crane Street, Houston, Harris County, Texas, for their outstanding pocket warrants. Affiant was advised by Sergeant K. Richards with the Houston Police Department, after his arrest, while at his residence, WILLIE provided consent to search his residence. Affiant was advised by Sergeant Richards, during the

search, a DPMS .223-5.56MM AR rifle was located, a black face mask, and a black duffel bag (matching the bag used in the robbery), and a black hoodie were located inside his residence. The AR rifle was also found to have an aftermarket attachment on the bottom of the grip, which matches the same attachment seen in the surveillance video on the rifle brandished by Passenger during the robbery. A black jacket with Brinks patches on the sleeves was also located inside WILLIE'S residence.

24. During AMON'S arrest, your Affiant spoke with the homeowner, identified as Madeline Alexander, in reference to this case. Ms. Madeline Alexander provided written consent to search the residence for evidence related to the robbery. During the search of the residence, AMON'S Texas Identification card was located inside an upstairs bedroom at the top of the stairs, which Ms. Madeline Alexander stated was AMON'S room. Inside the bedroom closet, Affiant located a plastic bag containing a large amount of cash, which was inside a shoe box on top of the shelf. The total amount of cash located inside of a shoe box was \$4,300. A money strap, used to identify a particular amount of cash within the strap was also located inside the same plastic bag. A semi-automatic pistol was also located inside a large plastic box on the floor inside the closet, along with a digital scale and individual plastic bags.

25. Affiant made contact with Mr. Sides and asked for him to verify whether WILLIE was ever employed by Brinks. Affiant was later advised WILLIE was previously employed by Brinks and his employment was terminated after WILLIE was identified as being involved in an internal theft. Mr. Sides also advised WILLIE was employed at the Brinks branch where the truck left on November 15, 2025 prior to the robbery.

26. DARIUS, AMON and WILLIE were transported to the FBI Houston Field Office where they were interviewed in reference to the robbery. During the individual interviews, WILLIE, DARIUS and AMON were provided with their Statutory Warnings, which they stated they understood and agreed to speak with investigators.

27. Special Agent P. Lewis and Affiant spoke with WILLIE in reference to the robbery. During the interview, WILLIE confirmed he was previously employed by Brinks and was terminated. WILLIE expressed his dissatisfaction with Brinks, stating he was terminated after having a procedure and being unable to return to work. WILLIE was shown still images from the Fuel and Food Mart surveillance video and he identified himself in the images as the male wearing all black who gets into the passenger side of the Cadillac prior to the robbery. WILLIE denied knowledge or participating in the armored car robbery. Affiant asked WILLIE about the AR rifle found at his residence and he stated he purchased the rifle from an unknown male and could not provide a name or any contact information for the male subject.

28. During the interview with AMON, he denied knowledge or to participating in the robbery. AMON was shown still images from the Valero Gas Station surveillance video of him wearing the gray hoodie with the white color words on the front, from November 15, 2025 after the robbery. AMON stated he was picked up from his residence and taken to the gas station to put gas in a vehicle (however, no gas was pumped while the Cadillac was at the Valero Gas Station). When asked about the cash located in the bedroom, AMON stated he is a signed artist. When AMON was asked about the images posted to his Instagram account, of him posting with a large amount of money the day after the robbery, he stated the postings were made to promote himself since he is a signed artist. At the time of his arrest, AMON was wearing the same gray

hoodie and what appeared to be the same gray color pants he was observed wearing in the Valero Gas Station surveillance video.

29. During the interview with DARIUS, he was shown images from the Fuel and Food Mart on November 15, 2025, and he identified himself in the still images. DARIUS also identified WILLIE as the male in the still images from Fuel and Food Mart and identified AMON as the male in the Valero Gas Station video. DARIUS claimed after leaving the Fuel and Foot Mart on November 15, 2025, he was taken to a girl's house off Fry Road where he was dropped off for a few hours. Affiant found this to be a false statement, due to the Cadillac's GPS records and phone records show they traveled to the area off of South Sam Houston Parkway West, just south of the Brinks Branch, and he did not go to a residence off Fry Road. DARIUS was shown a Flock image of the Hyundai, which he identified as Thurman's vehicle, which is his child's mother. DARIUS also identified a Flock image of the Cadillac CTS as his vehicle traveling on Barker Cypress Road. DARIUS claimed not to know what WILLIE did with his vehicle while he was dropped off at a female's house. DARIUS was unable to provide any identifying information for the female and he could not provide any contact information for the female to attempt to corroborate that he was at her residence. DARIUS was advised the Cadillac's GPS records and his cellphone records do not show the vehicle or his phone connecting to any cell towers off Fry Road. DARIUS continued to deny knowledge or involvement in the robbery. During the interview, DARIUS stated he has often used his child's mother's vehicle but does not know how it was left at the Residence Inn. At the time of his arrest, DARIUS was wearing the same black shoes with silver color tab near the toes as seen in the surveillance videos collected during the investigation.

30. Affiant has reason to believe and does believe that DARIUS, AMON and WILLIE committed an Aggravated Robbery of Victim and the Brinks armored truck. The beliefs are based on the following which include but are not limited to: the Cadillac and Hyundai being in tandem with each other up until the robbery, both vehicles traveling northbound on Barker Cypress Road to the Residence Inn hotel after the robbery, the Cadillac going to the Valero Gas Station off of North Eldridge Parkway and Katy Freeway where AMON and DARIUS are observed going in and making a purchase. DARIUS and WILLIE observed wearing the same or similar clothing at the Fuel and Food Mart prior to the robbery as the two suspects are seen wearing at the time of the robbery, the GPS records from the Cadillac showing the vehicle leaving the Fuel and Food Mart and going to the area of the Brinks branch; then going to the area of the H-Mart during and around the time of the robbery. All three subjects phone records showing the phones being connected to towers that service the Brinks branch prior to the robbery, then consistent with the time the vehicles are following the armored truck from the area near the branch to the H-Mart, then connecting to towers that service the H-Mart around and during the time of the robbery, then connecting to towers which service the Residence Inn during and around the time the vehicle's arrive at the Residence Inn Hotel, then also connecting to the tower which services the Valero Gas Station during the time the Cadillac is at the store, the AR rifle matching the same description as one of the rifles brandished during robbery, and the black duffel bag matching the duffel style bag carried by the driver during robbery, which were recovered from WILLIE'S residence during the search. AMON wearing the same hoodie he is seen wearing in the Valero Gas Station video after the robbery.

31. Based on the foregoing your Affiant believes there is probable cause to believe that on November 15, 2025, DARIUS ALEXANDER, AMON ALEXANDER, and WILLIE BOYD committed the offenses of Aiding and Abetting Interference with Interstate Commerce by Robbery Violence in violation of Title 18, United States Code, Sections 1951(a) and 2 and Aiding and Abetting Brandishing a Firearm During and in Relation to a Crime of Violence in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.



Ryan Hilz
Task Force Officer
Federal Bureau of Investigations

Sworn to and subscribed before me by telephone on this the 18th day of December, 2025 and I find probable cause.



Hon. Yvonne Ho
United States Magistrate Judge