

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

FILED

February 5, 2026

KAREN MITCHELL

CLERK, U.S. DISTRICT
COURT

United States of America

v.

Laroyce Antoine Lambert

Case No.

3:26-MJ-107-BK

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 February 4, 2026 in the county of Dallas in the
Northern District of Texas, the defendant(s) violated:

Code Section

18 U.S.C. § 1951

Offense Description

attempted interference of commerce by robbery

This criminal complaint is based on these facts:

See attached Affidavit of FBI TFO Victor Diaz

☒ Continued on the attached sheet.



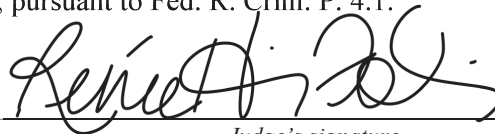
Complainant's signature

TFO Victor Diaz, FBI

Printed name and title

Agent sworn and signature confirmed via reliable electronic means, pursuant to Fed. R. Crim. P. 4.1.

Date: February 5, 2026



Judge's signature

City and state: Dallas, Texas

RENÉE HARRIS TOLIVER, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Victor Diaz, being duly sworn under oath, do hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Task Force Officer (TFO) with the Federal Bureau of Investigation (“FBI”) and have been since April 2021. I am currently assigned to the Dallas Field Office. Since being assigned to the FBI, I have investigated violations of federal law, including Hobbs Act robberies. I have gained experience through training classes and actual work conducting these types of investigations. Further, as a TFO, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.

2. As part of my duties as a TFO, I investigate criminal violations relating to violent crimes. I know it is a violation of federal law to commit interference with commerce by robbery, in violation of 18 U.S.C. § 1951, as follows:

Whoever in any way or degree obstructs, delays, or affects commerce or the movement of any article or commodity in commerce, by robbery or extortion or attempts or conspires so to do, or commits or threatens physical violence to any person or property in furtherance of a plan or purpose to do anything in violation of this section shall be fined under this title or imprisoned not more than twenty years, or both.

3. The facts and information contained in this affidavit are based upon my direct participation in this investigation and based upon facts related to me by other law enforcement officers and my review of records and information provided. This affidavit is being submitted for the limited purpose of establishing probable cause for the charged offense. As a result, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth those facts which I believe are necessary to establish probable cause to show that **Laroyce Antoine Lambert** committed a violation of 18 U.S.C. § 1951, that is, attempted interference with commerce by robbery.

PROBABLE CAUSE

4. On or about February 4, 2026, at 0838 hours Balch Springs Police Officers J. Czech # 592 and G. Pate #591 were dispatched to 12329 Lake June Road, Balch Springs, Dallas County, Texas 75180 (Chase Bank) in reference to a robbery. This is a location within the Dallas Division of the Northern District of Texas.

5. Call notes read that an armed suspect had run north from the business after crossing the fence to the alley behind the Chase Bank. A check of the area was completed for the suspect, which yielded negative results.

6. Citizens alerted officers that someone had been shot near the ATMs. Officers moved to the location and observed a subject later identified as A.G. lying on his back next to a Loomis security truck. Victim A.G. was in a fully marked Loomis security uniform.

7. Several citizens were yelling that A.G. had been shot and were attempting to render first aid. Officers observed a large amount of blood on the ground around A.G.'s head which made it difficult for officers to assess the head wound, but they believed the primary wound was a gunshot wound to the right temple area. Officer used a large cloth provided by a citizen to wrap around A.G.'s head and maintained direct pressure until they were relieved by medical personnel.

8. Officer Pate removed body armor from A.G. and checked for further injuries. He also observed a gunshot wound on A.G.'s right arm.

9. After A.G. was secured in a responding Med Jets ambulance, multiple responding officers secured the area with crime scene taped and searched the area for suspects as investigators from FBI Dallas (including members of the Violent Crimes Task Force) responded to the scene.

10. Body Worn Camera (BWC) was collected from A.G.'s body armor. A review of the BWC revealed the suspect—a dark-skinned male, wearing a black hoodie, black pants, black shoes, blue latex gloves on both hands, and a white cloth covering the majority of his face—approached the victim at the ATM. The suspect—later identified as Lambert—had a firearm in his right hand, a black and gray duffel bag in his left hand, and had a two-way radio clipped to his hoodie towards the center of his chest.

11. As I reviewed the BWC footage, I noticed that Lambert's eyes, eyebrows, and some skin were visible. I also noticed a visible tattoo on Lambert's right forearm as he pointed the firearm at A.G..

12. Lambert approached A.G. while demanding access to the money. A.G. responded that he had already closed the ATM and could not reopen it. Lambert ordered A.G. away from the ATM and back towards the Loomis vehicle at gunpoint. As A.G. opened the door to the Loomis vehicle, Lambert fired three rounds from his firearm apparent contact or near-contact shot at A.G. causing A.G. to immediately fall to the ground. I believe the shots were contact or near-contact shots based upon my review of the BWC footage and because I could see blood on the BWC footage coming from A.G. immediately after Lambert fired the shots.

13. Lambert began to run away but then returned to the Loomis truck and appeared to look for something, possibly the fired cartridge casings, on the ground around A.G.'s body before running east through a hole in the north fence line. I did not observe Lambert take any property from A.G. or the Loomis vehicle.

14. Dallas FBI, Evidence Response Team responded to process the scene and recovered three projectiles and two spent casings. The third casing was not located. The spent casings were entered into NIBIN for further analysis and did not return to any other offenses.

15. Investigators were able to review surveillance footage of nearby businesses and saw Lambert enter a dark Dodge Charger with unique characteristics such as a missing front bumper (depicted below) (the "Suspect Vehicle").



16. The Suspect Vehicle left the adjacent business parking lot without a front license plate. Dallas Police Department (DPD) covert elements were canvassing for vehicles that matched the unique description of the Suspect Vehicle when they observed a Dodge Charger missing the front bumper displaying Texas license plate RNW5683 located at 9415 Bruton Road, Dallas, Dallas County, Texas. I researched the vehicle's registration and saw that the license plate returned to Geico, which in my training and experience leads me to believe that the vehicle was recently purchased at auction.

17. A historical of the license plate RNW5685 through LPR software revealed that the Suspect Vehicle had been driven with that license plate as early as months prior to the offence and as recently as the same day of the offense.

18. A further check of the license plate in law enforcement case management databases revealed a DPD traffic stop on August 8, 2025. The report noted that Lambert was the driver and sole occupant at the time. Investigators reviewed the DPD BWC footage for the August 8, 2025 traffic stop and observed Lambert with a tattoo that appeared to match what was depicted on A.G.'s BWC.

Lambert's general physique also appeared to match the suspect depicted in A.G.'s BWC. On the DPD BWC, Lambert admitted to possessing a firearm on August 8, 2025 which matched the general description of the firearm used on February 4.



Left: Screenshot of A.G.'s BWC Center: Screenshot of August 8 DPD BWC depicting Lambert's tattoos Right: Screenshot of the firearm Lambert possessed on August 8

19. I obtained a State of Texas arrest warrant for Lambert for Aggravated Robbery later in the evening of February 4, 2025. Meanwhile, DPD covert elements tracked Lambert to an apartment in Fort Worth, Texas where they saw the Dodge Charger parked in front. As Fort Worth Police Department (FWPD) was preparing to execute an arrest, Lambert and a female exited the apartment and entered the Charger.

20. FWPD stopped Lambert and arrested him without incident. A DPD marked unit transported Lambert to the City of Mesquite Jail for an interview.

21. The Dodge Charger was impounded to the FBI auto lot pending a search. As investigators were loading the Dodge Charger onto the back of a tow truck, they saw a handgun slide from the front of the vehicle to the back.

22. I obtained a State of Texas search warrant for the Dodge Charger. Inside, the investigators located a handgun and blue latex gloves, both consistent with what was depicted in A.G.'s BWC. Officers also secured the cell phone—a white iPhone—from inside the vehicle.

23. During a recorded, *Mirandized* interview, Lambert confessed to his involvement in the robbery. Specifically, Lambert said:

- a. He knew the Loomis guard would be at the location on Wednesday after 8am.
- b. Lambert planned the robbery by conducting surveillance of the area approximately one and a half weeks prior, including driving through the neighborhood and checking nearby alleys.
- c. On Tuesday, February 3, 2026, an unknown driver operating the Dodge Charger and Lambert went to the Chase Bank location and removed several fence pickets. After removing the pickets, they placed them back, leaning against the fence.
- d. On February 4, 2026, Lambert stated he was dropped off near the bank by the unknown driver. After being dropped off, Lambert walked toward the opening in the fence and waited. Lambert

reported that when the security guard exited the van, he could see the guard's feet underneath the vehicle as the guard stepped out.

- e. Lambert said he walked up to the victim and demanded the money.

Lambert described what he was wearing as black pants and hoodie with a white face covering. Lambert also said he had a two-way

radio on his person. Additionally, he said he was wearing gloves.

When the victim said he could not give him the money he directed him towards the van. When the victim unlocked the Loomis van and entered the door, Lambert observed the victim pull his gun and yelled at him. In that moment Lambert said he fired three shots at the victim. Later in the interview he said he thought he fired 3-4 shots.

- f. I questioned Lambert on what he was doing after firing the shots and he said after briefly running away he ran back and started looking for the shell casings. Lambert told me that he located one casing and picked it up and then ran off. Lambert then ran North back towards the fence line and into the alley. The unknown driver then picked him up. After being picked up at some point the driver requested to be let out and pulled over. According to Lambert the driver exited the vehicle at an unknown location and Lambert drove away.

- g. Lambert said that he discarded the clothing, mask, duffel bag, gloves, and two-way radio at an unknown location.

h. I asked about his cell phone. Lambert said the phone was an Apple iPhone and was located in the Dodge Charger. I asked where the cellular phone was located during the robbery and Lambert said it was inside the Dodge Charger. I asked if he used his cellular phone to look up Google maps or use the internet to search Chase Bank and Lambert said he did.

24. Lambert told investigators that the phone number to his iPhone was (318) 732-4746 and provided a code to unlock the device.

25. FBI Special Agent Katlyn Stinson contacted a representant from Loomis to inquire about the effect that Lambert's actions had on interstate commerce. They stated:

- a. Loomis Armored U.S., LLC ("Loomis U.S.") is a division of Loomis AB, an international cash handling and secure logistics company headquartered in Stockholm, Sweden. Loomis AB operates globally across Europe, the United States, and South America.
- b. Loomis Armored U.S., LLC is an interstate common carrier, registered with the United States Department of Transportation under USDOT number 252201.
- c. Within the United States, Loomis operates an extensive network of secure armored transportation and cash handling services. The U.S. division maintains nearly 200 operating locations and utilizes a fleet

of approximately 3,000 armored and other vehicles across its service regions.

- d. Loomis Armored U.S., LLC is authorized for interstate for-hire property transportation and maintains active FMCSA operating authority under its USDOT registration.
- e. Loomis estimated the incremental cost to be \$11,624. This total reflects:
 - i. Lost Revenue — 48 Customers Not Serviced:
 - ii. Loomis was unable to service 48 customers, resulting in an estimated revenue loss of \$2,424 based on an average revenue per customer of \$50.50 (avg).
 - iii. Last Minute Travel from Houston: To continue operations, risk management, and corporate support, Loomis incurred last-minute travel expenses for three team members from our Houston office, including walk-up airfare, hotel, per diem, ground transportation, and applicable change fees, totaling \$3,550.
 - iv. Two-Day Service Delay: The two-day delay in servicing affected customers resulted in \$2,650 in customer credits/discounts and operational impacts (e.g., emergency services, penalties, and credits for non-provided services).

- v. Internal Labor: Loomis incurred 60 internal hours across operations, dispatch, customer support, and management at a fully loaded rate of \$50/hour, totaling \$3,000.

CONCLUSION

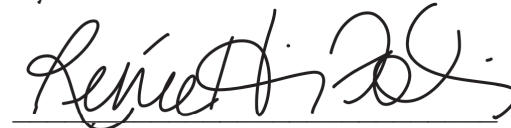
26. Based on the forgoing, there is probable cause to believe that on or about February 5, 2025, **Laroyce Antoine Lambert** committed a violation of 18 U.S.C. § 1951, that is, attempted interference of commerce by robbery.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Victor Diaz", written over a horizontal line.

VICTOR DIAZ
Task Force Officer
Federal Bureau of Investigation

Agent sworn and signature confirmed before me via reliable electronic means pursuant to Fed. R. Crim. P. 4.1 on February 5, 2026.

A handwritten signature in black ink, appearing to read "Renee Harris Toliver", written over a horizontal line.

RENEE HARRIS TOLIVER
United States Magistrate Judge
Dallas, Texas