

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

XAVIAR MICHAEL BABUDAR,
a/k/a "ChiefsAholc,"
[DOB: 07/03/1994],

Defendant.

CASE NO. _____

COUNTS ONE to ELEVEN:

(Concealment Money Laundering)

18 U.S.C. § 1956(a)(1)(B)(i)

NMT: Twenty Years' Imprisonment

NMT: \$500,000 Fine and/or Twice the Value

of the Property Involved in the Transaction

NMT: Three Years' Supervised Release

Class C Felony

COUNTS TWELVE to FIFTEEN:

(Interstate Transportation of Stolen Property)

18 U.S.C. § 2314

NMT: Ten Years' Imprisonment

NMT: \$250,000 Fine

NMT: Three Years' Supervised Release

Class C Felony

COUNTS SIXTEEN to EIGHTEEN:

(Bank Theft)

18 U.S.C. §§ 2113(b) & (d)

NMT: Twenty-five Years' Imprisonment

NMT: \$250,000 Fine

NMT: Five Years' Supervised Release

Class B Felony

COUNT NINETEEN:

(Bank Theft)

18 U.S.C. § 2113(b)

NMT: Ten Years' Imprisonment

NMT: \$250,000 Fine

NMT: Three Years' Supervised Release

Class C Felony

ALLEGATIONS OF FORFEITURE

18 U.S.C. §§ 982(a)(1) and 981(a)(1)(C)

and 28 U.S.C § 2461

\$100 Special Assessment for Each Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

1. At all material times:
2. The defendant, **XAVIAR MICHAEL BABUDAR** (“**BABUDAR**”), lived a nomadic existence at various locations around the Kansas City metropolitan area, which includes the Western District of Missouri, and in recent years gained online notoriety as Twitter user “@ChiefsAholc,” a superfan of the Kansas City Chiefs who would attend most games dressed as a wolf in Chiefs clothing.
3. **BABUDAR**’s ability to attend these games and sustain this lifestyle was funded by his perpetration of a string of robberies at various times throughout 2022. Since at least March 2022, **BABUDAR** would travel to locations throughout the Midwestern United States and other nearby states to rob various banks and credit unions. **BABUDAR** would then take and carry the money stolen from these robberies home to the Kansas City metropolitan area to launder these robbery proceeds through area casinos. **BABUDAR** used the proceeds from these bank and credit union robberies to attend numerous Chiefs home and away football games, and placed various wagers on the outcomes of Chiefs games.
4. During this same time, **BABUDAR** has no reported wages in the states of Missouri or Kansas.

Great Western Bank Robbery – March 2, 2022

5. On or about March 1, 2022, **BABUDAR** departed Independence, Missouri, for Clive, Iowa.

6. On March 2, 2022, **BABUDAR** stole \$70,000 from the Clive, Iowa branch of the Great Western Bank (“GWB”). **BABUDAR** took and carried this money from Iowa to Missouri, transporting it in interstate commerce, knowing the same to have been stolen.

7. Upon arriving in Kansas City, Missouri, in the Western District of Missouri, **BABUDAR** concealed some of the \$70,000 in money stolen from GWB by depositing this same amount in two separate transactions into his Community America Credit Union (“CACU”) money market savings account ending in x1480 (“CACU Account x1480”).

8. On March 17, 2022, **BABUDAR** deposited \$30,000 in cash into his CACU Account x1480 at the CACU 64th Street Branch located at 6390 N. Cosby Avenue, Kansas City, Missouri, in the Western District of Missouri.

9. Between March 20 and April 12, 2022, **BABUDAR** cashed in approximately \$163,100 in cash and chip purchases at Argosy Casino in Riverside, Missouri, and Harrah’s Kansas City Casino in North Kansas City, Missouri, and cashed out \$189,375 in chip redemptions and cash payments at these same casinos.

10. On April 12, 2022, **BABUDAR** deposited the remaining balance from this bank robbery – \$40,000 – into his CACU Account x1480 while at the CACU Branch located at 825 NE Rice Road, Lee’s Summit, Missouri, which is within the Western District of Missouri.

First National Bank of Omaha Robbery – April 28, 2022

11. On or about April 27, 2022, **BABUDAR** departed Kansas City, Missouri, for Omaha, Nebraska.

12. On April 28, 2022, **BABUDAR** robbed the Omaha, Nebraska branch of the First National Bank of Omaha of \$170,860. Omaha police recovered approximately \$163,560 following the theft. On April 29, 2022, **BABUDAR** returned to Kansas City, Missouri.

First Class Community Credit Union Robbery – July 13, 2022

13. On or about July 12, 2022, **BABUDAR** departed Kansas City, Missouri, for West Des Moines, Iowa.

14. On July 13, 2022, **BABUDAR** stole \$303,845 from the West Des Moines, Iowa branch of the First Class Community Credit Union (“FCCCU”). In the course of this robbery **BABUDAR** brandished what appeared to be a silver and black firearm, jumped over the teller counter, and demanded that the bank employees open the bank vault.

15. On that same day **BABUDAR** took and carried this money from West Des Moines, Iowa to Kansas City, Missouri, transporting in interstate commerce the \$303,845 in money stolen from FCCCU, knowing the same to have been stolen.

16. On July 14, 2022, the day after the FCCCU robbery, **BABUDAR** deposited \$23,000 in cash into his CACU Account x1480 at the CACU Rice Road Branch located at 825 NE Rice Road, Lee’s Summit, Missouri.

17. Upon arriving in Kansas City, Missouri, **BABUDAR** concealed some of the \$303,845 in money stolen from FCCCU by concealing and disposing of that stolen U.S. Currency by using it to make various casino chip purchases over the next three months at casinos located within the Western District of Missouri and elsewhere. In between trips to these casinos located in Missouri and Illinois, **BABUDAR** cashed out his winnings and deposit the same to his CACU bank account.

18. Shortly after his robbery of the FCCCU on July 13, 2022, **BABUDAR** began using the cash stolen from this robbery to purchase casino chips at Harrah's Kansas City Casino in North Kansas City, Missouri, Bally's Kansas City (formerly Isle of Capri Kansas City) in Kansas City, Missouri, and Argosy Casino in Riverside, Missouri, all of which are within the Western District of Missouri. Between July 13 and October 13, 2022, **BABUDAR** cashed in approximately \$1,179,395 in cash and chip purchases at Harrah's Kansas City Casino, Bally's Kansas City (formerly Isle of Capri Kansas City), and Argosy Casino, and cashed out \$1,138,200 in chip redemptions and cash payments at these same casinos.

19. On July 23, 2022, Harrah's Kansas City Casino in North Kansas City, Missouri, which is within the Western District of Missouri, issued a \$20,000 check to **BABUDAR**. **BABUDAR** deposited this check to his CACU Account x1480 on July 28, 2022.

20. On July 27, 2022, IOC – Kansas City, Inc. (d/b/a Isle of Capri Kansas City casino, now known as Bally's Kansas City) in Kansas City, Missouri, issued a \$20,000 check to **BABUDAR**. On July 28, 2022, **BABUDAR** deposited this check to his CACU Account x1480.

21. On August 1, 2022, The Missouri Gaming Company (d/b/a Argosy Casino), issued a \$30,000 check to **BABUDAR**. On August 5, 2022, **BABUDAR** deposited this check to his CACU Account x1480 at the CACU Tiffany Springs branch located at 9060 NW Skyview Avenue, Kansas City, Missouri.

22. On August 5, 2022, The Missouri Gaming Company (d/b/a Argosy Casino), which is within the Western District of Missouri, issued a \$30,000 check to **BABUDAR**. On August 8, 2022, **BABUDAR** deposited this check to his CACU x1480 account.

23. On August 8, 2022, The Missouri Gaming Company (d/b/a Argosy Casino), issued a \$15,000 check to **BABUDAR**. On August 10, 2022, **BABUDAR** deposited this check to his

CACU Account x1480 at the CACU 40 Highway Hy-Vee branch located at 4545 S. Noland Road, Independence, Missouri.

The Tennessee Credit Union Robbery – November 17, 2022

24. On November 17, 2022, **BABUDAR** stole \$125,900 from the Nashville, Tennessee branch of The Tennessee Credit Union (“TTCU”). In the course of this robbery **BABUDAR** brandished what appeared to be a silver and black firearm, climbed over the teller counter, and demanded that the bank employees take him to the bank vault. **BABUDAR** told bank employees if he was given a dye pack he would “come back and put a hole in your head.”

25. **BABUDAR** took and carried this money from Nashville, Tennessee to Kansas City, Missouri on November 19, 2022, transporting some of the \$125,900 in money stolen from TTCU in interstate commerce, knowing the same to have been stolen.

26. On November 22, 2022, five days after he robbed TTCU, **BABUDAR** purchased \$20,000 in casino chips in multiple transactions from the Harrah’s North Kansas City Casino in North Kansas City, Missouri, using the proceeds from the TTCU robbery.

First Interstate Bank Robbery – November 30, 2022

27. On November 28, 2022, **BABUDAR** departed Kansas City, Missouri for Minnesota.

28. Following two unsuccessful robberies of the Wings Financial Credit Union in Savage, Minnesota, and the Royal Credit Union in Apple Valley, Minnesota on November 29, 2022, **BABUDAR** departed Minnesota for Clive, Iowa.

29. At some time after **BABUDAR** robbed the Clive, Iowa branch of the Great Western Bank on March 2, 2022, the Great Western Bank was fully acquired by First Interstate Bank, and this same branch location was rebranded as First Interstate Bank.

30. On November 30, 2022, **BABUDAR** returned to the scene of his March 2, 2022, robbery of the then-Great Western Bank branch, and stole \$25,000 from the Clive, Iowa branch of First Interstate Bank (“FIB”). In the course of this robbery **BABUDAR** brandished what appeared to be a silver and black firearm, jumped over the teller counter, and ordered the bank employees at gunpoint to open the bank vault.

31. **BABUDAR** took and carried this money from Clive, Iowa to Kansas City, Missouri that same day, transporting the \$25,000 in money stolen from FIB in interstate commerce, knowing the same to have been stolen.

32. Later that same day, November 30, 2022, **BABUDAR** deposited \$8,000 in cash into his Mazuma Credit Union (“Mazuma”) checking account ending in x8432 (“Mazuma Account x8432”) at the Mazuma Crossroads branch located at 1910 Main Street, Kansas City, Missouri.

33. On December 8, 2022, **BABUDAR** deposited \$5,000 in cash into his Mazuma Account x8432 at the Mazuma East Lee’s Summit branch located at 1155 NE Douglas Street, Lee’s Summit, Missouri, which is within the Western District of Missouri.

BABUDAR’s December 16, 2022 Robbery of the Tulsa Teachers Federal Credit Union and Subsequent Flight

34. On December 15, 2022, **BABUDAR** departed Kansas City, Missouri, bound for Oklahoma. The following day, on December 16, 2022, **BABUDAR** stole \$150,250 from the Tulsa Teachers Federal Credit Union (“TTFCU”) in Bixby, Oklahoma. **BABUDAR** was arrested shortly after this theft, was charged with this bank theft, and detained awaiting trial. In February 2023, shortly before Super Bowl LVII, **BABUDAR** was released on bond with the condition that he remain in Oklahoma and be subjected to location monitoring via a GPS ankle monitor.

35. Months earlier, on June 10, 2022, Ameristar Casino Kansas City in Kansas City, Missouri, issued a \$20,000 check to **BABUDAR**. **BABUDAR** deposited this check to his CACU Account x1480 on June 13, 2022. The following day **BABUDAR** made two cash withdrawals of \$10,000 each from this same CACU Account x1480 at CACU branches located at 6390 N. Crosby Avenue, Kansas City, Missouri, and 1811 Walnut Street, Kansas City, Missouri, both of which are in the Western District of Missouri. Two days later, first on June 16, and again on June 17, **BABUDAR** placed two bets, for \$5,000 each, at the Argosy Casino in Alton, Illinois. **BABUDAR**'s first \$5,000 bet was that Kansas City Chiefs' quarterback Patrick Mahomes II would win the Most Valuable Player at Super Bowl LVII, which would pay out \$45,000 should that occur. **BABUDAR**'s second \$5,000 bet was that the Kansas City Chiefs would win Super Bowl LVII, which would pay out \$55,000 should that occur.

36. On February 12, 2023, the Kansas City Chiefs were victorious over the Philadelphia Eagles, winning Super Bowl LVII 38-35, and Patrick Mahomes II won the Most Valuable Player Award. As a result of these outcomes, **BABUDAR** was owed approximately \$100,000 in winnings. Shortly after Super Bowl LVII, individuals claiming to be **BABUDAR**'s family members attempted to secure said winnings from Argosy Casino.

37. In early March 2023, Argosy Casino received an envelope via UPS which contained the two wagers with **BABUDAR**'s signature. On March 3, 2023, Argosy Casino sent **BABUDAR** a \$100,000 casino check via UPS to an address in Tulsa, Oklahoma. Soon after **BABUDAR**'s receipt of this check, he cut his ankle monitor and fled Oklahoma, and continued to evade law enforcement until his arrest in Sacramento on July 7, 2023.

38. Great Western Bank and First Interstate Bank were, and are, organized under the laws of the United States, and are institutions the deposits of which are insured by the Federal Deposit Insurance Corporation, and are banks as defined under 18 U.S.C. § 2113(f). First Class Community Credit Union and The Tennessee Credit Union are State-chartered credit unions, the accounts of which are insured by the National Credit Union Administration Board, and are credit unions as defined under 18 U.S.C. § 2113(g).

COUNTS ONE through ELEVEN

39. The United States realleges Paragraphs 1 through 38.

40. On or about the following dates, in the Western District of Missouri and elsewhere, the defendant, **XAVIAR MICHAEL BABUDAR**, did knowingly conduct and attempt to conduct the financial transactions listed below, which involved the use of a financial institution that was engaged in, or the activities of which affected, interstate commerce, and which involved the proceeds of a specified unlawful activity, that is, including, but not limited to interstate transportation of stolen property, in violation of Title 18, United States Code, Section 2314, and bank robbery and bank theft, in violation of Title 18, United States Code, Section 2113, knowing that each transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of such specified unlawful activity, and that while conducting and attempting to conduct the financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity,

Count	Date, Location, and Amounts from Bank / Credit Union Robbery	Date of BABUDAR's Transaction	Transaction	Amount
One	\$70,000 stolen from Great Western Bank on March 2, 2022	March 17, 2022	BABUDAR deposited cash into CACU Account x1480 at Kansas City, Missouri branch of CACU	\$30,000
Two	\$70,000 stolen from Great Western Bank on March 2, 2022	April 12, 2022	BABUDAR deposited cash into CACU Account x1480 at Lee's Summit, Missouri branch of CACU	\$40,000
Three	\$303,845 stolen from First Class Community Credit Union on July 13, 2022	July 14, 2022	BABUDAR deposited cash into CACU Account x1480 at Lee's Summit, Missouri branch of CACU	\$23,000
Four	\$303,845 stolen from First Class Community Credit Union on July 13, 2022	July 28, 2022	BABUDAR deposited check from Harrah's Kansas City Casino (North Kansas City, Missouri) into CACU Account x1480	\$20,000
Five	\$303,845 stolen from First Class Community Credit Union on July 13, 2022	July 28, 2022	BABUDAR deposited check from Isle of Capri Kansas City (Kansas City, Missouri) Casino into CACU Account x1480	\$20,000
Six	\$303,845 stolen from First Class Community Credit Union on July 13, 2022	August 5, 2022	BABUDAR deposited check from Missouri Gaming Company (d/b/a Argosy Casino) (Riverside, Missouri) Casino into CACU Account x1480 at CACU Tiffany Springs branch	\$30,000
Seven	\$303,845 stolen from First Class Community Credit Union on July 13, 2022	August 8, 2022	BABUDAR deposited check from Missouri Gaming Company (d/b/a Argosy Casino) (Riverside, Missouri) Casino into CACU Account x1480	\$30,000

Eight	\$303,845 stolen from First Class Community Credit Union on July 13, 2022	August 10, 2022	BABUDAR deposited check from Missouri Gaming Company (d/b/a Argosy Casino) (Riverside, Missouri) Casino into CACU Account x1480 at 40 Highway Hy-Vee branch in Independence, Missouri	\$15,000
Nine	\$125,900 stolen from The Tennessee Credit Union on November 17, 2022	November 22, 2022	BABUDAR purchased \$20,000 in casino chips at Harrah's North Kansas City Casino	\$20,000
Ten	\$25,000 stolen from First Interstate Bank on November 30, 2022	November 30, 2022	BABUDAR deposited cash into Mazuma Account x8432 at Mazuma Crossroads Kansas City, Missouri branch	\$8,000
Eleven	\$25,000 stolen from First Interstate Bank on November 30, 2022	December 8, 2022	BABUDAR deposited cash into Mazuma Account x8432 at Mazuma East Lee's Summit, Missouri branch	\$5,000

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNTS TWELVE through FIFTEEN
Interstate Transportation of Stolen Property

41. The United States realleges Paragraphs 1 through 38.
42. On or about the following dates, in the Western District of Missouri and elsewhere, the defendant, **XAVIAR MICHAEL BABUDAR**, did unlawfully transport, transmit, and transfer in interstate commerce from the locations listed below to Kansas City, Missouri, stolen goods, wares and merchandise, that is, the U.S. Currency stolen from the banks and credit unions listed below, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud,

Count	Amount Transported, Transmitted, and Transferred from Bank / Credit Union Robbery	Dates of BABUDAR's Transportation	Originating Location of Stolen Currency
Twelve	\$68,540 stolen from Great Western Bank on March 2, 2022	March 2 to 17, 2022	Clive, Iowa
Thirteen	\$303,845 stolen from First Class Community Credit Union on July 13, 2022	July 13, 2022	West Des Moines, Iowa
Fourteen	\$125,900 stolen from The Tennessee Credit Union on November 17, 2022	November 17 to 19, 2022	Nashville, Tennessee
Fifteen	\$25,000 stolen from First Interstate Bank on November 30, 2022	November 30, 2022	Clive, Iowa

All in violation of Title 18, United States Code, Section 2314.

COUNTS SIXTEEN through EIGHTEEN
Bank Theft

43. The United States realleges Paragraphs 1 through 38.

44. On or about the following dates, in the Western District of Missouri and elsewhere, the defendant, **XAVIAR MICHAEL BABUDAR**, did take and carry away with intent to steal and purloin, from the care, custody, control, management and possession of the banks and credit unions listed below, the deposits of which were insured by the Federal Deposit Insurance Corporation at the time of such taking and carrying away, or was a State-chartered credit union the accounts of which were insured by the National Credit Union Administration Board at the time of such taking and carrying away, and in committing or in attempting to commit these offenses, did assault any person, and put in jeopardy the life of any person by the use of a dangerous weapon or device, that is, what appeared to be a silver and black firearm,

Count	Amount Taken and Carried Away with Intent to Steal and Purloin from Bank / Credit Union Robbery	Dates of BABUDAR's Bank / Credit Union Theft	Institution and Nature of Insurance
Sixteen	\$303,845 stolen from First Class Community Credit Union on July 13, 2022	July 13, 2022	First Class Community Credit Union, state-chartered and NCUAB insured
Seventeen	\$125,900 stolen from The Tennessee Credit Union on November 17, 2022	November 17 to 19, 2022	The Tennessee Credit Union, state-chartered and NCUAB insured
Eighteen	\$25,000 stolen from First Interstate Bank on November 30, 2022	November 30, 2022	First Interstate Bank, FDIC insured

All in violation of Title 18, United States Code, Sections 2113(b) & (d).

COUNT NINETEEN
Bank Theft

45. The United States realleges Paragraphs 1 through 38.

46. Between on or about March 2, 2022 and March 17, 2022, in the Western District of Missouri and elsewhere, the defendant, **XAVIAR MICHAEL BABUDAR**, did take and carry away with intent to steal and purloin, \$70,000 of money from the care, custody, control, management and possession of the Great Western Bank in Clive, Iowa, the deposits of which were insured by the Federal Deposit Insurance Corporation at the time of such taking and carrying away, all in violation of Title 18, United States Code, Section 2113(b).

FORFEITURE ALLEGATION ONE

47. The allegations contained in Counts One through Eleven of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

48. Upon conviction of any violation of Title 18, United States Code, Section 1956, the defendant, **XAVIAR MICHAEL BABUDAR**, shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

49. The property subject to forfeiture includes, but is not limited to, a forfeiture money judgment representing the proceeds obtained by the defendant, in that such sum, in aggregate, is involved in, or derived from, proceeds traceable to the offenses set forth in Counts One through Eleven of this Indictment.

Substitute Assets

50. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any

other property of the defendant up to the value of the above-forfeitable property or to seek return of the property to the jurisdiction of the Court so that the property may be seized and forfeited.

All pursuant to the provisions of Title 18, United States Code, Section 982(a)(1), and the procedures outlined in Title 21, United States Code, Section 853(p).

FORFEITURE ALLEGATION TWO

51. The allegations contained in Counts Twelve through Nineteen of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461.

52. Upon conviction of an offense in violation of Title 18, United States Code, Section 2113, or Title 18, United States Code, Section 2314, the defendant, **XAVIAR MICHAEL BABUDAR**, shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to the violations contained in Counts Twelve through Nineteen of this Indictment.

53. The property subject to forfeiture includes, but is not limited to, a forfeiture money judgment equal to the amount of United States currency obtained by the defendant in connection with the violations alleged in Counts Twelve through Nineteen of this Indictment, for which the defendant is convicted.

Substitute Assets

54. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C), and the procedures outlined in Title 21, United States Code, Section 853(p).

A TRUE BILL.

/s/ Kimberley Deardorff
FOREPERSON OF THE GRAND JURY

/s/ Patrick Daly
Assistant United States Attorney

Dated: 08/16/2023
Kansas City, Missouri