## CONTINUATION OF CRIMINAL COMPLAINT

- 1. I, Trisha M.A. Kovac, am a Special Agent of the Federal Bureau of Investigation (FBI) currently assigned to the Detroit Division, St. Joseph Resident Agency, FBI Violent Crimes Task Force. I have been an FBI Special Agent for over 7 years, and during that time have investigated numerous violations of federal law including bank robberies.
- 2. This continuation is in support of a criminal complaint and is based upon information I discovered in the course of my investigation, information from other FBI Special Agents, other law enforcement officers, and witness interviews. Not all of the information acquired in this investigation is contained within this continuation.
- 3. On Friday, 06/10/2016, at approximately 12:30 pm, a robbery was committed at the Chemical Bank located at 68955 M-62, Edwardsburg, MI 49112. Edwardsburg is located in Cass County. Surveillance footage and witnesses described the robber as a lone white male in his 40s, approximately six feet in height, slender build, with short stubble hair, receding hairline, and an unshaven face, wearing sunglasses, a grey long-sleeved shirt with writing on his left side of the chest, and blue jeans.
- 4. The man wrote a note at the stand in the bank, and presented it to the teller on the far left in respect to the customers. The note stated, "20s 50s and 100s". The note also had something else written that the teller could not make out. The robber stated calmly, "This is a robbery. Make it quick." The teller retrieved the money from the drawer at the drive-thru window. The robber took the note with him when given the money, and simply grabbed the money in his hands and left.
- 5. The bank's loss was \$1,610.00 in U.S. currency. Five bait bills were included in the loss. The bank was federally insured at the time of the robbery by the Federal Deposit Insurance Corporation.
- 6. After gathering the money, the robber exited through the main entrance towards a vehicle, a white pickup truck. The robber can be seen on surveillance footage running to the truck, and is observed to be the only person in the truck. The truck was suspected to be a late 1990s-early 2000s model Dodge.
- 7. Cass County Sheriff placed bank surveillance images of the suspect on CrimeNet and social media, receiving several responses for potential subjects. The name William Thomas SEXTON (Born in March 1978)<sup>1</sup> was repeatedly reported by both law enforcement and community tipsters. Review of SEXTON's Facebook page and driver's license photograph revealed an individual very similar in appearance to the bank robber.
- 8. Edwardsburg Police Chief Timothy Kozal responded to a tip from one of his officers regarding SEXTON; an individual involved recently in an incident with SEXTON. The

<sup>&</sup>lt;sup>1</sup>SEXTON's actual date of birth is known to me.

individual reviewed the images from the robbery of the subject and of the vehicle, and stated that the individual believed the surveillance image to be SEXTON. Upon reviewing the image of the vehicle, the individual identified the white truck utilized by SEXTON as likely belonging to a Greg SMITH

- 9. Greg SMITH was identified through South Bend law enforcement as being Gregory SMITH (born June 1975), with an address of 702 Haney Avenue, South Bend, IN.
- 10. Law enforcement drove to the address and located a vehicle similar to the one driven by the subject at the robbery. At one point, an individual matching the robbery suspect's appearance walked in and out of the residence.
- 11. Officers made contact with Greg SMITH. SEXTON was at the residence, but reluctant to speak to law enforcement. SMITH stated that SEXTON had borrowed the his truck, a 1996 white Dodge Ram at approximately 11:30 a.m. that day to run errands, and returned it at approximately 3:00 p.m. that same day.
- 12. SMITH's wife, Jennifer SMITH, was interviewed by officers, and stated that she had returned from work at 1:30 p.m. on 06/10/2016 and had noticed that her husband's white truck was missing, but her husband was at home. Jennifer stated that SEXTON returned to the residence shortly after 3:00 p.m. with the vehicle. Upon review of Gregory SMITH's drivers license photograph, his appearance is not physically similar to that of the bank robber.
- 13. SEXTON was taken into custody for parole violations and interviewed. SEXTON denied being in Michigan on 06/10/2016.
- 14. SMITH gave consent to law enforcement to search his residence and his vehicle. The search recovered sunglasses and a sweatshirt similar to those that were observed to be worn by the robber.
- 15. This affidavit is presented as probable cause that William Thomas SEXTON robbed the Chemical Bank at 68955 M-62, Edwardsburg, MI on 06/10/2016; in violation of Title 18, United States Code Section 2113(a).

Affiant further sayeth not.