

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

SEP 12 2014

UNITED STATES OF AMERICA

CASE NUMBER:

v.

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

EDWARD G. KLICH

14 CR

513

CRIMINAL COMPLAINT

MAGISTRATE JUDGE SCHENKIER

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about September 11, 2014, at Wood Dale, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, United States Code, Section 2113(a)	Bank Robbery

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

FRANK SODETZ
Special Agent, Federal Bureau of Investigation
(FBI)

Sworn to before me and signed in my presence.

Date: September 12, 2014

Sidney I. Schenkier

Judge's signature

City and state: Chicago, Illinois

SIDNEY I. SCHENKIER, U.S. Magistrate Judge
Printed name and Title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

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AFFIDAVIT

I, FRANK SODETZ, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, and have been so employed since 2001. My current responsibilities include the investigation of violent crimes, including, among others, kidnaping, bank robbery, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that EDWARD G. KLICH 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 KLICH 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. The information set forth in this Affidavit is based on multiple sources, including but not limited to, my personal knowledge, and my review of documents and reports related to this investigation, witness interviews, my review of information conveyed to me by other local and federal law enforcement officers. The information outlined below is provided for the limited purpose of establishing

probable cause, and does not contain all details or facts of which I am aware relating to this investigation.

Background of the Investigation

4. The FBI is investigating several bank robberies conducted in the Chicago, Illinois, area between 2011 and 2014.

5. According to Bank Teller 1 (hereafter "Teller 1") and bank surveillance, on September 11, 2014, at approximately 11:48 a.m., the U.S. Bank located at 333 East Irving Park Road, Wood Dale, Illinois, was robbed by an unknown male subject (hereafter "robber"). At the time of the robbery, U.S. Bank was federally insured by the Federal Deposit Insurance Corporation (hereafter "FDIC").

6. According to Teller 1, a white male in his 60's, approximately 6' tall, with a skinny build approached the teller counter. Teller 1 immediately recognized the man as the same individual who had robbed the same bank location while Teller 1 was working in November 2013, when the bank was a Charter One location.¹ During the September 11, 2014, robbery, the robber told Teller 1, "this is a robbery, there's another guy outside," and to give the robber the "100's and 50's." According to Teller 1, the robber said, "you'll see me again." Teller 1 went to the teller drawer and removed money and placed it on the counter. The robber took the money from the counter and departed from the bank with the money. According to Teller 1, the

¹ As explained below, KLICH has admitted to FBI agents that on November 15, 2013, he robbed the Charter One Bank located at 333 East Irving Park Road, Wood Dale, Illinois.

robber wore a heavy dark jacket with a dark hood pulled up, a dark blue scarf covering part of his face, and dark cloth gloves. According to the U.S. Bank audit, the total loss amount to the bank was approximately \$2,354 in cash.

7. I have reviewed the still images from the surveillance footage of the September 11, 2014 robbery of U.S. Bank. The images depict a white male suspect with a long nose and a slender build wearing prescription type glasses. The images depict the robber approach the teller wearing a dark jacket with a dark hood, a dark scarf over part of his face, dark gloves, and dark shoes. The jacket has two black lines running down the entire length of the right sleeve, and a white line and a black line running across the chest. The scarf is dark and contains a white pattern.

8. Very soon after the September 11, 2014, bank robbery, law enforcement officers responded to an emergency call from U.S. Bank at 333 East Irving Park Road, Wood Dale, Illinois. According to the officers, as they approached U.S. Bank, they observed a green-colored 1995 Buick Le Sabre (“the Buick”) driving near the bank. According to the officers, they were already aware that a green Buick from the 1990’s had been identified as the vehicle used in recent bank robberies in the area.² According to the officers, the Buick they observed near U.S. Bank matched the description of the vehicle used to rob the other banks. According to the officers, they activated their emergency lights and siren to stop the Buick but

² A 1990’s green Buick was reported to law enforcement as being used in an April 7, 2014, robbery at the Chase Bank at 133 West Grand Avenue, Bensenville, Illinois, and a September 3, 2014, robbery at the First Merit Bank located at 900 East Higgins Road, Elk Grove Village, Illinois. As explained below, KLICH admitted to FBI agents that he committed both of these robberies.

the driver, later identified as EDWARD G. KLICH, did not stop the vehicle. Following a pursuit, KLICH eventually stopped and got out of the vehicle's driver seat. According to the officers, there were no other individuals in the Buick. After getting out of the Buick, KLICH rushed towards the officers while holding a pen in his hand with a black hood wrapped around the pen and his hand. As KLICH rushed towards the officers he pointed the pen and dark cloth towards the officers. KLICH was eventually placed under arrest. The black hood that KLICH had wrapped around his hand and the pen was recovered after KLICH was placed into custody. The hood matches the dark hood worn by the robber in the bank surveillance images.

9. Law enforcement officers brought Teller 1 for a show-up to see if Teller 1 recognized KLICH from the robbery. During the show-up, KLICH was not wearing the dark jacket, the dark hood, the scarf, or his glasses. According to Teller 1, Teller 1 could not positively identify KLICH as the man who entered the bank because the clothes KLICH was wearing at the show-up were different than what he was wearing in the bank.

10. KLICH was subsequently interviewed by law enforcement agents. Prior to the interview, KLICH was informed of his *Miranda* rights and indicated he understood those rights. During the interview, KLICH stated that he robbed U.S. Bank on September 11, 2014. KLICH said he drove his wife's green Buick Le Sabre to U.S. Bank and parked on a street to the east of the bank. According to KLICH, he wore a dark jacket and a black hood, a plaid scarf, gloves, and blue jeans.

KLICH said he entered the bank, approached a brunette teller, and said, "this is a robbery. There are two of us. Give me your 100's and 20's." The teller gave KLICH the money and KLICH left the bank and ran to his car. KLICH said he threw the money on the front passenger seat of the Buick but was eventually stopped by the police. According to KLICH, he intentionally rushed at the police after his vehicle was stopped.

11. During the interview with KLICH, he provided law enforcement agents with consent to search the Buick he used to rob U.S. Bank. During the search, agents located a dark gray jacket with two black lines running down the entire length of the right sleeve and a white line and a black line running across the chest. A dark blue scarf with a white pattern and dark cloth gloves were also located in the Buick. The jacket, the scarf, and the gloves located in the Buick match the jacket and scarf worn by the robber in the surveillance images. Agents also located approximately \$1,874 in cash in the front passenger seat area.

12. As part of this investigation, I have identified a series of bank robberies committed by an individual who matches KLICH in physical appearance and in style of attire. During the interview with KLICH on September 11, 2014, KLICH admitted that he had committed robberies of other banks in the Chicago area, and initialed surveillance still images from the following robberies, identifying himself as the robber in the images:

- a) On July 28, 2011, the Chase Bank located at 2641 Kirchoff Road, Rolling Meadows, Illinois;

- b) On February 15, 2013, the BMO Harris Bank located at 130 West Devon Avenue, Wood Dale, Illinois;
- c) On April 19, 2013, the Charter One Bank located at 3901 Kirchoff Road, Rolling Meadows, Illinois;
- d) On November 15, 2013, the Charter One Bank located at 333 East Irving Park Road, Wood Dale, Illinois;
- e) On December 2, 2013, the Charter One Bank located at 3901 Kirchoff Road, Rolling Meadows, Illinois;
- f) December 9, 2013, the Chase Bank located at 123 Main Street, Bensenville, Illinois;
- g) April 7, 2014, the Chase Bank at 133 West Grand Avenue, Bensenville, Illinois;
- h) On September 3, 2014, the First Merit Bank located at 900 East Higgins Road, Elk Grove Village, Illinois.

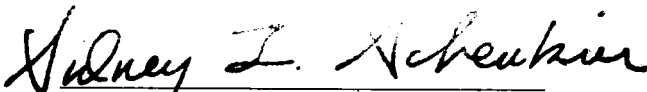
CONCLUSION

13. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that on or about September 11, 2014, at Wood Dale, in the Northern District of Illinois, Eastern Division, defendant EDWARD G. KLICH, by intimidation, took from the person and presence of a bank employee, approximately \$2,354 in United States Currency belonging to and in the care, custody, control, management, and possession of U.S. Bank, 333 East Irving Park Road, Wood Dale, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

FURTHER AFFIANT SAYETH NOT.

FRANK SODETZ
Special Agent, Federal Bureau of
Investigation

SUBSCRIBED AND SWORN to before me on September 12, 2014.



SIDNEY I. SCHENKIER
United States Magistrate Judge