

UNITED STATES DISTRICT COURT

for the
District of Minnesota

UNITED STATES OF AMERICA

v.

Case No.

13-MS-319-JJG

FEHD EL MEHDI KOURIMA

CRIMINAL COMPLAINT

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about May 5, 2013, in Benton County, in the State and District of Minnesota, defendant

did by force, violence and intimidation, take from the person and presence of another money which belonged to and was in the care, custody, control, management, and possession of TCF Bank, located at 1001 4th Street Southeast, St. Cloud, Minnesota, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation,

in violation of Title 18, United States Code, Section 2113(a).

I further state that I am a Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No




Complainant's signature

Chad Schliepsiek, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 5/9/13



Judge's signature

The Honorable Jeanne J. Graham

United States Magistrate Judge

Printed name and title

City and state: St. Paul, MN



STATE OF MINNESOTA)
) ss. AFFIDAVIT OF CHAD SCHLIEPSIEK
COUNTY OF RAMSEY)

I, Chad Schliepsiek, being first duly sworn under oath, depose and state as follows:

1. I am employed as a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI"), and have been since 2003. I am currently assigned to the FBI's St. Cloud Resident Agency. My duties include investigating a variety of federal crimes, including bank robberies and other violent crimes.

2. This affidavit is based on my training, experience, personal knowledge and observations in this investigation; upon my discussions with other law enforcement officers and agents directly involved in this investigation; and upon my review of official reports submitted in relation to this investigation.

3. This affidavit is made for the purpose of establishing probable cause in support of a federal arrest warrant and therefore contains only a summary of relevant facts.

4. On May 5, 2013, at approximately 12:30 p.m., the TCF bank branch located inside the Cash Wise grocery store at 1001 4th Street Southeast, St. Cloud, Minnesota, was robbed by a lone male. The robber entered the bank, approached the victim teller and gave him a demand note along with a white envelope. The note stated something to the effect of, "Put as many \$100 bills as you can into this envelope in fifteen seconds and no one gets hurt." The teller immediately complied with the robber's demand and removed twenty-dollar bills, including three bait bills, from his teller drawer

and placed them in the envelope. The robber took the envelope filled with money, along with the note, and left through the Cash Wise store's northern exterior doors.

5. An audit conducted by the bank revealed that the robber was given exactly \$1,000.00. The robber was described as male, either dark-skinned Caucasian or of Hispanic origin, with a full, dark beard. He was further described as approximately 35-40 years old, approximately six feet tall, weighing about 200 pounds, and wearing a black baseball cap with yellow writing on the front and a gray and maroon jacket.

6. Law enforcement officers reviewed the bank's security camera footage and could observe a male suspect exit the Cash Wise grocery store and run to a small, black vehicle parked in the parking lot.

7. At approximately 3:44 p.m., a man called the St. Cloud Police Department from 1500 East St. Germain Street, Apartment No. 14, St. Cloud, Minnesota, to report that he believed that he had done something bad and that he was in possession of a large amount of money. St. Cloud Police officers went to the residence and made contact with Fehd El Medhi Kourima, who was born in 1977. The officers noted that Kourima's physical appearance matched that of the suspect described by the teller and observed on the security video. For their safety, the officers performed a pat-down search on Kourima and located \$580.00 in twenty-dollar bills (which did not include the three bait bills) in Kourima's rear left pants pocket. They also located a white envelope in his front left pants pocket.

8. Kourima consented to a search of his residence. Officers located a piece of notebook paper that appeared to have been shredded by hand in the trash. The words "15

seconds” and “\$100 bills” were visible on the shredded pieces of paper.

9. On May 7, 2013, St. Cloud Police Department officers obtained a search warrant for Kourima’s vehicle, a black 2001 Chevrolet Prism. On the front passenger’s seat, officers recovered a black baseball cap with yellow lettering, as well as a gray and maroon jacket.

10. At the time of the robbery, the deposits of TCF Bank were insured by the Federal Deposit Insurance Corporation.

11. Based upon the facts conveyed in this affidavit, I submit that there is probable cause to believe that FEHD EL MEHDI KOURIMA committed the bank robbery that occurred on May 5, 2013, at the TCF Bank in St. Cloud, Minnesota, in violation of Title 18, United States Code, Section 2113(a).

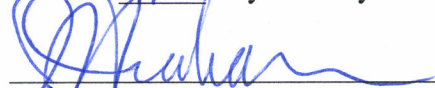
Further your Affiant sayeth not.



Chad Schliepsiek
Special Agent
FBI

SUBSCRIBED and SWORN to before

me this ^{9th} day of May.



The Honorable Jeanne J. Graham
United States Magistrate Judge