

UNITED STATES DISTRICT COURT

for the

Eastern District of Tennessee

United States of America

v.

GORDON HAROLD WILLIAMS

Defendant(s)

Case No.

3:12-MJ-1126

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 July 30, 2012 in the county of Knox in the
Eastern District of Tennessee, the defendant(s) violated:

Code Section

18 U.S.C. § 2113(a) and (d)

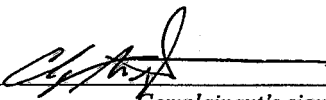
Offense Description

the defendant did by force, violence, and intimidation take and cause to be taken from the person and presence of another, money belonging to and in the care, custody, control, management, and possession of the BB&T Bank, located at or near 7108 Maynardville Pike, Knoxville, Tennessee, 37918, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in doing so did put in jeopardy the life of a person by the use of a dangerous weapon and device.

This criminal complaint is based on these facts:

Please see the attached Affidavit of FBI Special Agent Clay Anderson

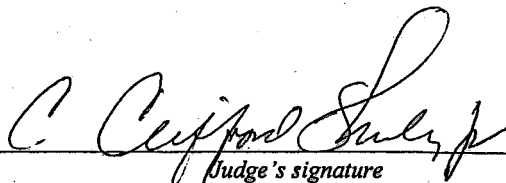
☒ Continued on the attached sheet.


Complainant's signature

Clay Moss Anderson
Printed name and title

Sworn to before me and signed in my presence.

Date: 7-31-2012


Judge's signature

City and state: Knoxville, Tennessee

C. Clifford Shirley, United States Magistrate Judge
Printed name and title

STATE OF TENNESSEE)

Docket No. 3:12-MJ-1126

COUNTY OF KNOX)

AFFIDAVIT

I, Clay Moss Anderson being duly sworn, depose and state as follows:

1. I am a Special Agent ("SA") of the Federal Bureau of Investigation ("FBI"), United States Department of Justice, and have been so assigned since March 2009. Prior to my employment as a FBI Special Agent, I was a law enforcement officer for the previous nine years. During that time, I was a lead or support investigator on a number of criminal cases, including assault, frauds, robberies, burglaries, and homicides. My primary duties and responsibilities involve the investigation of violations of federal law, including bank robbery as defined in Title 18, United States Code, Section 2113. I am currently assigned to the Violent Crime / Major Offender Squad within the Knoxville office of the FBI.

2. I am familiar with the ways bank robbers commit robberies, including but not limited to the use of notes, verbal demands, weapons, and intimidation as well as the methods used to evade law enforcement detection.

3. I am an "Investigative or Law Enforcement Officer" within the meaning of Section 2510 (7) of Title 18, United States Code; that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2113.

4. I am participating in an investigation of a bank robbery which is being conducted by Special Agents of the FBI, the Knoxville Police Department and the Knox County Sheriff's Department, located in Knoxville, Tennessee.

5. On July 30, 2012, a white male, later identified as Gordon Harold Williams (hereinafter referred to as Williams), entered the BB&T Bank located at 7108 Maynardville Pike, Knoxville, Tennessee 37918, the deposits of which were then insured by the Federal Deposit Insurance Corporation. Upon entering the BB&T Bank, Williams told a teller he wanted to make a withdrawal. The teller asked Williams for his driver's license or account number. In response, Williams began opening his backpack and stated to the teller, "I have a bomb and need your money." Williams opened the backpack and the teller gave Williams money from the teller drawer. After this teller gave Williams the money, Williams stepped to the next teller window, looked at the teller and said, "You too." In response to Williams' demand, the second teller provided Williams money. Between the both tellers, Williams obtained \$1,546.00.


6. After receiving the money, Williams exited the bank and walked to a motorcycle parked in the bank's parking lot. Williams exited the parking lot heading north on Maynardville Pike.

7. On July 31, 2012, agents located Williams at the Scottish Inn in Knoxville, Tennessee. Agents knocked on the door and identified themselves. Williams confirmed his identity to the agents. Agents asked Williams if he knew why they were at his hotel room, to which Williams responded, "yes." Agents *Mirandized* Williams and Williams agreed to waive his rights. Williams admitted to robbing the BB&T Bank with a bomb, on July 30, 2012, as discussed in paragraph 5 of this affidavit. Further, Williams described the bomb as an explosive device designed to be detonated with a lighter. Williams told agents he had a lighter in his possession at the time of the robbery and that he was prepared to ignite the explosive device if "anything went wrong" during the robbery. Williams directed the agents' attention to the bed in the hotel room. A lighter was on top of the bed and Williams told the agents that it was the lighter he had during the robbery. Williams also produced for the agents some of the remaining money he had robbed from the BB&T Bank.

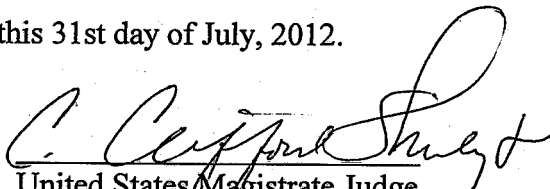
8. Williams, who resides with his mother, gave agents consent to search his property at his mother's residence. Williams told the agents that the bomb he used to rob the bank as inside a backpack on a table next to the motorcycle, inside the garage. Williams further told agents that the funnel he used to pour the liquid accelerant into the bomb was in the garage along with other components Williams used to manufacture the explosive device. Additionally, Williams told agents that the shotgun shells he used to obtain the gunpowder and pellets were in his bedroom, in his mother's house. Agents went to Williams' mother's residence and obtained consent from the mother to search the residence.

9. Agents found the bomb inside a backpack, in the garage next to the motorcycle. The bomb consisted of a small plastic baby bottle filled with gunpowder, bird shot and metal screws. This baby bottle was taped to a 20 ounce soda bottle which was filled with gasoline. These components were taped to a small propane tank which also had an additional soda bottle filled with gasoline taped to it. Agents also found a mason jar filled with an additional accelerant. Williams told agents that his intent was to pour this accelerant over the device and ignite it with a lighter. Additionally, agents found shotgun shells in Williams' bedroom, in his mother's house. Some of the shells had been cut open and emptied.

10. Based upon the information contained in this affidavit and based on my training and experience, I believe there is probable cause to believe that Williams did by force, violence, and intimidation take and cause to be taken from the person and presence of another, money belonging to and in the care, custody, control, management, and possession of the BB&T Bank, located at or near 7108 Maynardville Pike, Knoxville, Tennessee, 37918, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in doing so did put in jeopardy the life of a person by the use of a dangerous weapon and device, in violation of 18 U.S.C. § 2113(a) and (d).


Clay Moss Anderson
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 31st day of July, 2012.


United States Magistrate Judge