

UNITED STATES DISTRICT COURT
for the
Eastern District of Tennessee

United States of America

v.

CHAD SCHAFFNER

Defendant

Case No. 2:09-MJ- **155**

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 of see below in the county of see below in the Eastern District of
Tennessee, the defendant violated 18 U. S. C. § 2113(a) and 924(c)(1)
, an offense described as follows:

Count One

The United States Attorney charges on or about August 18, 2009, within the Eastern District of Tennessee, CHAD SCHAFFNER, by force, violence and intimidation did take from the person or presence of another money belonging to and in the care, custody, control, management, and possession of Community National Bank, Jefferson City, Tennessee, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

Count Two

The United States Attorney charges that on or about August 18, 2009, within the Eastern District of Tennessee, CHAD SCHAFFNER, by force, violence and intimidation did take from the person or presence of another money belonging to and in the care, custody, control, management, and possession of First Tennessee Bank, Morristown, Tennessee, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

Count Three

The United States Attorney charges that on or about August 18, 2009, within the Eastern District of Tennessee, CHAD SCHAFFNER, did use, carry and brandish a firearm in relation to Count One of this complaint, in violation of Title 18, United States Code, Section 924(c)(1).

Count Four

The United States Attorney charges that on or about August 18, 2009, within the Eastern District of Tennessee, CHAD SCHAFFNER, did use, carry and brandish a firearm in relation to Count Two of this complaint, in violation of Title 18, United States Code, Section 924(c)(1).

This criminal complaint is based on these facts:

I, LANE P. RUSHING, being duly sworn do hereby state:

I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been employed as such for over 15 years. I am currently assigned to the Johnson City, Tennessee, Office of the FBI. I investigate criminal matters to include bank robbery investigations. During the past 15 years, I have had specialized training, instruction and experience in such investigations.

Chad Schaffner is a white male who was recently discharged from the Indiana Department of Corrections for Armed Robbery (See attached Department of Corrections Offender Data). Your affiant has confirmed with Indiana authorities that Schaffner was actually released from custody in December 2008 rather than the July 18, 2009 date reflected in the offender data. On August 18, 2009, Schaffner entered the Community National Bank in Jefferson City, Tennessee. At approximately 12:39 P.M., Schaffner demanded cash from a teller at the bank and displayed a firearm. The teller gave Schaffner the money which included a die-pack and was ordered by Schaffner to lie down in a back office of the bank. Schaffner left the bank with the cash and approximately forty feet from the bank the die-pack exploded. Schaffner fled after discarding the bag and money. On the same date at approximately 1:59 PM, Schaffner entered the First Tennessee Bank in Morristown Tennessee armed with a firearm and demanded money from the teller. He told the teller "don't put a die pack in the bag or I will come back and blow your head off." The teller complied and Schaffner fled the bank with a quantity of cash.

Both banks are located in the Eastern District of Tennessee and both are insured by the Federal Deposit Insurance Corporation.

On August 25, 2009, Special Agents with the Federal Bureau of Investigation ("FBI") interviewed a male individual who has known Chad Schaffner for approximately two months. He confirmed that Schaffner was in the Morristown Tennessee area at the time of the bank robberies and confirmed his identity by viewing an Indiana drivers license photo (see attached). He also viewed surveillance photographs taken from the Jefferson City robbery and confirmed that the robber was in fact Schaffner. (See attached bank surveillance photo).

Based on prior interviews, Agents interviewed a female in the Morristown Tennessee area who it was believed had had a relationship with Schaffner for the prior two weeks. She met FBI agents outside her residence but advised the agents that she did not know Schaffner. The following day she was again interviewed by law enforcement and confirmed that she did know Schaffner and that he was in her apartment at the time she talked with agents the prior night. She told agents that when they arrived the night before Schaffner had showed her a gun and threatened the lives of her children (who were in her apartment at time) if she told law enforcement about him. She advised that after the agents left the night before, Schaffner had fled her residence in a large gray sedan with Knox County tags.

It is believed based on a comparison of surveillance photographs that Schaffner is responsible for multiple bank robberies in Kentucky, North Carolina and South Carolina. Attached are surveillance photos from ten bank robberies occurring from May through August of 2009.

☐ Continued on the attached sheet.



Complainant's signature

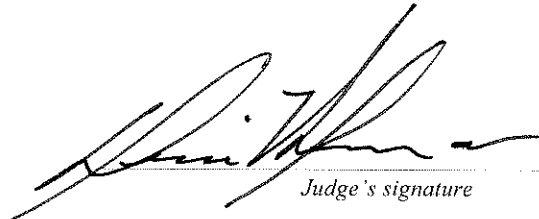
LANE P. RUSHING, SPECIAL AGENT FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: Aug 27, 2009

City and state: Morristown, TN



Judge's signature

DENNIS H. INMAN

Printed name and title

U.S. MAGISTRATE JUDGE