

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KASEY STUART GILRUTH LANG

Defendant

Case No.: 3:22-mj-228-KFR

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Katie Yarborough, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. This affidavit is submitted in support of a criminal complaint against KASEY STUART GILRUTH LANG for violating 18 U.S.C. § 2113(a) – Bank Robbery.
2. I am familiar with the information contained in this affidavit based upon the investigation I have conducted, in conjunction with other federal, state, and local law enforcement officials, which has included exchanging information with law enforcement officers and others; reviewing video surveillance, reports, database records and other information acquired during this investigation; and reviewing evidence obtained therefrom; and interviewing witnesses.
3. Because I submit this affidavit for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me or the

government. I have only included those facts necessary to establish probable cause to believe that LANG has committed a violation of 18 U.S.C. § 2113(a).

4. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been since March 2019. I am currently assigned to the Violent Crime squad in the FBI Anchorage Field Office. During my time with the FBI, I have lead and participated in investigations involving violent crimes, threats, robbery, fraud, and drugs. Prior to joining the FBI, I was employed as a legislative auditor for the Medicaid Division with the State of Tennessee.

#### **RELEVANT STATUTES AND REGULATIONS**

5. The relevant statutory authority and terms used in this affidavit and its attachments are described and defined below.

a. 18 U.S.C. § 2113(a), states: "Whoever, by force and violence, or by intimidation, takes, or attempts to take, from the person or presence of another, or obtains or attempts to obtain by extortion any property or money or any other thing of value belonging to, or in the care, custody, control, management, or possession of, any bank, credit union, or any savings and loan association; or [w]hoever enters or attempts to enter any bank, credit union, or any savings and loan association, or any building used in whole or in part as a bank, credit union, or as a savings and loan association, with intent to commit in such bank, credit union, or in such savings and loan association, or building, or part thereof, so used, any felony affecting such bank, credit union, or such savings and loan

association and in violation of any statute of the United States, or any larceny- [s]hall be fined under this title or imprisoned not more than twenty years, or both."

b. 18 U.S.C. § 2113(f) states: "As used in this section the term "bank" means any member bank of the Federal Reserve System, and any bank, banking association, trust company, savings bank, or other banking institution organized or operating under the laws of the United States, including a branch or agency of a foreign bank (as such terms are defined in paragraphs (1) and (3) of section 1(b) of the International Banking Act of 1978), and any institution the deposits of which are insured by the Federal Deposit Insurance Corporation."

c. 18 U.S.C. § 2113(g), states: "As used in this section the term 'credit union' means any Federal credit union and any State-chartered credit union the accounts of which are insured by the National Credit Union Administration Board, and any 'Federal credit union' as defined in section 2 of the Federal Credit Union Act. The term 'State-chartered credit union' includes a credit union chartered under the laws of a State of the United States, the District of Columbia, or any commonwealth, territory, or possession of the United States."

### **PROBABLE CAUSE**

6. Alaska USA Federal Credit Union, Nuvision Credit Union, and Credit Union 1, are all credit unions that were, at all times relevant to this complaint, insured by the National Credit Union Administration Board. Alaska USA Federal Credit Union, Nuvision Credit Union, and Credit Union 1 operate a number of branches in Anchorage, Alaska to provide financial services to its members.

7. Northrim Bank, is an institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC).

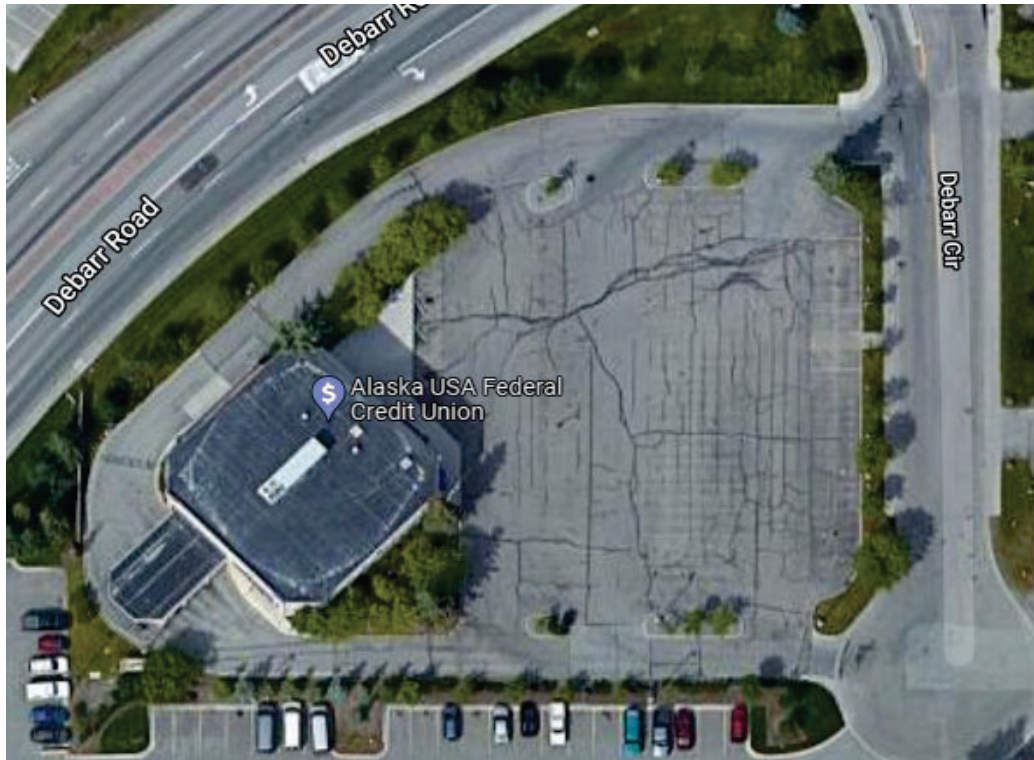
8. On April 26, 2022 at approximately 6:00pm, an unidentified male subject robbed the Alaska USA Federal Credit Union located at 1650 W Northern Lights Blvd, Anchorage, Alaska, using a demand note, which threatened the use of violence. The male subject stole \$5,325.00 in cash from the credit union. Anchorage Police Department Officers (APD) responded to the scene (APD case # 22-013193), but initial attempts to locate the subject were unsuccessful. The note stated, "STILL NO JOKE, \$3,000 ASAP NO ONE GETS HURT, DO NOW!"

9. The map below depicts the location of the Alaska USA Federal Credit Union branch on W Northern Lights Blvd:



10. On April 27, 2022 at approximately 10:26am, a male subject robbed the Alaska USA Federal Credit Union located at 2600 Debarr Road, Anchorage, Alaska, using a demand note and a verbal threat of violence. The male subject stole \$500.00 in cash from the bank. APD Officers responded to the scene (APD case # 22-013277). APD's investigation led them to believe it was the same male suspect as the previous Alaska USA bank robbery from the day before on W. Northern Lights.

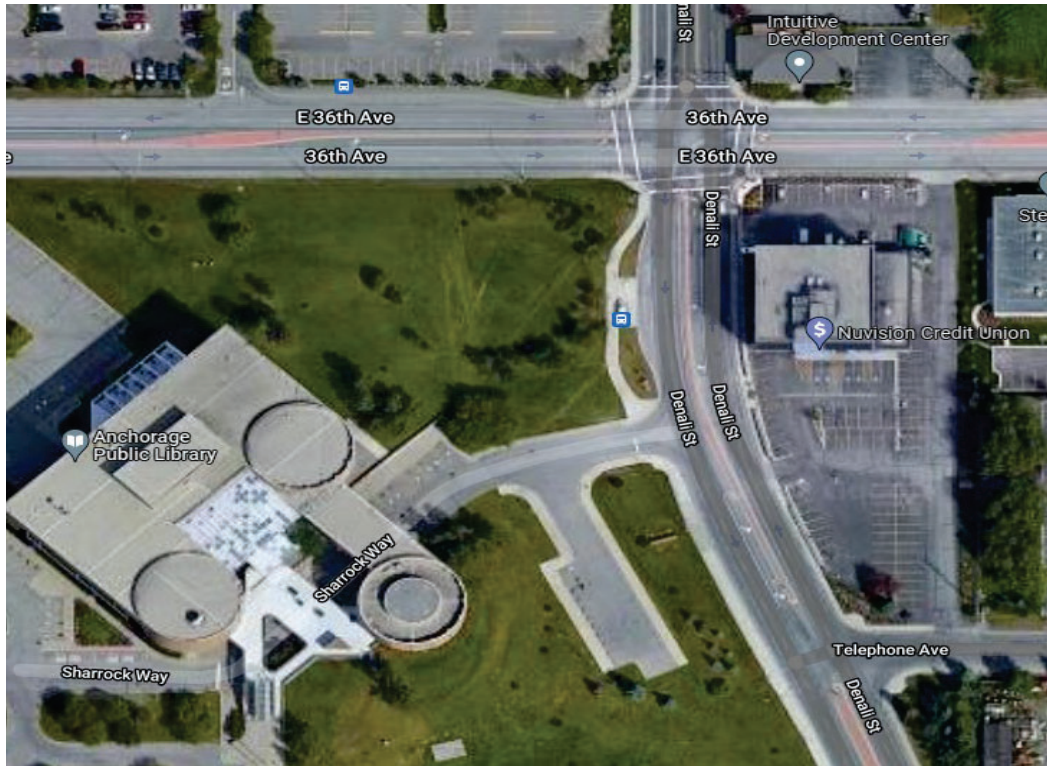
11. The map below depicts the location of the Alaska USA Federal Credit Union branch on Debarr Road:



12. On April 27, 2022 at approximately 2:12pm, a male subject robbed the Nuvision Credit Union located at 440 E 36th Ave, Anchorage, Alaska, using a demand note. The male subject stole \$351.00 in cash from the credit union and fled the scene. APD Officers responded to the scene, but initial attempts to locate the subject were unsuccessful. APD Officers later reviewed footage of the suspect getting into a cab near the credit union. APD acquired footage from the cab company located at 6707 Greenwood Street, Anchorage, AK. APD identified the male subject as LANG based on numerous prior contacts.



13. The map below depicts the location of the Nuvison Credit Union branch on 36<sup>th</sup> Avenue:



14. On April 28, 2022 at approximately 4:06pm, APD was notified by Northrim Bank located at 517 W 7<sup>th</sup> Avenue, Anchorage, Alaska a male subject matching the description of the robbery suspect from the prior days was inside the bank at that time. APD responded to the scene; however, the suspect seemed to have gotten spooked and left the bank prior to robbing the bank or approaching a teller. An FBI Task Force member responded to the bank, reviewed the footage, and identified the subject as LANG.

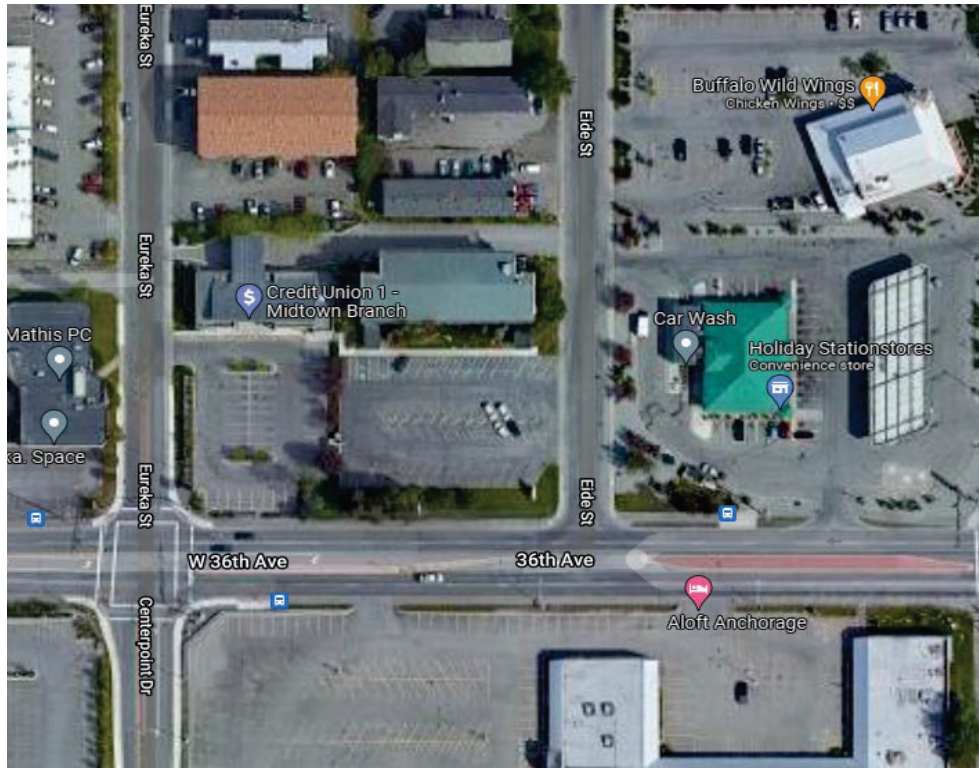
15. On April 29, 2022 at approximately 10:04am, APD was notified by Northrim Bank located at 2709 Spenard Road, Anchorage, Alaska a male subject matching the description of the robbery suspect from the prior days was inside

the bank at that time. APD responded to the scene; however, the suspect seemed to have gotten spooked again and left the bank prior to any attempt to robbing the bank. An APD Officer reviewed the footage and identified the subject as LANG. APD Officers and FBI responded to the area in an attempt to locate LANG.

16. On April 29, 2022 at approximately 10:30am, a male subject robbed the Credit Union 1 Bank located at 3525 Eureka Street, Anchorage, Alaska, using a demand note, which threatened the use of violence. The male subject stole \$2,050.00 in cash from the bank. The male subject fled on foot from the scene. APD Officers and FBI responded to the scene and located LANG a few blocks from the bank. LANG was taken into custody without incident.



17. The map below depicts the location of the Credit Union 1 midtown branch on Eureka Street:



18. During the arrest of LANG, APD Officers observed LANG attempting to hide US currency on the ground near him. FBI seized the money, which was later revealed to have currency matching the serials taken from Credit Union 1.

19. FBI conducted an interview with the teller at Credit Union 1. The teller stated the male subject had approached the teller and displayed a note which read similar to “\$7,000 in envelope. Don’t make a sound. No one gets hurt.” The teller alerted fellow employees they were being robbed. The teller told FBI they were very scared. The teller handed the male subject all the \$100 and \$50 dollar bills from their top drawer of the till. These bills included three \$100 bait bills, which later had been found near the male subject.

20. APD Officers and FBI transported LANG to the FBI Anchorage Field Office where he was then interviewed. FBI advised LANG of his Miranda Rights, and he agreed to speak with them.

21. LANG admitted to committing the bank robberies at:

a. Alaska USA Federal Credit Union located at 1650 W Northern Lights Blvd, Anchorage, Alaska

b. Alaska USA Federal Credit Union located at 2600 Debarr Road, Anchorage, Alaska

c. Nuvision Credit Union located at 440 E 36th Ave, Anchorage, Alaska

d. Credit Union 1 Bank located at 3525 Eureka Street, Anchorage, Alaska

22. LANG admitted his motivation to commit the bank robberies was his need to get money to pay for drugs. LANG admitted to also entering the two other banks, Northrim Bank located at 517 W 7th Avenue, Anchorage, Alaska and Northrim Bank located at 2709 Spenard Road, Anchorage, Alaska. LANG stated he entered the two banks with the intent to rob them. The first Northrim bank he entered, he thought the manager recognized him and had hit the alarm, so he left. The second Northrim bank LANG entered, he believed that he waited in the lobby for too long and thought the employees recognized him and hit the alarm, so he left.

CONCLUSION

23. Based upon the information above, your affiant submits that there is probable cause to believe that KASEY STUART GILRUTH LANG took, by intimidation of force, money belonging to, or under the care, custody, and control of: Alaska USA Federal Credit Union located at 1650 W Northern Lights Blvd, Anchorage, Alaska; ~~Alaska USA Federal Credit Union located at 2600 DeBarr Road, Anchorage, Alaska; Nuvision Credit Union located at 440 E 36th Ave, Anchorage, Alaska;~~ and Credit Union 1 Bank located at 3525 Eureka Street, Anchorage, Alaska in violation of 18 U.S.C. § 2113(a) - Bank Robbery.

*[Handwritten signature]*  
4/29/22

Respectfully submitted,

S/ Katie Yarborough  
Katie Yarborough  
Special Agent  
Federal Bureau of Investigation

Affidavit submitted by email/pdf and attested to me as true and accurate by telephone consistent with Fed.R.Crim. P. 4.1 ~~and/or~~ 4(d) for an arrest warrant or 41(d)(3) for a search warrant this 29th day of April, 2022:

*[Handwritten signature]*  
\_\_\_\_\_  
Kyle R. Rear  
United States Magistrate Judge  
District of Alaska  
Anchorage, Alaska

