

3:26-mj-00053

DISTRICT OF OREGON, ss: AFFIDAVIT OF ETHAN ETTER

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Ethan Etter, being duly sworn, do hereby depose and state as follows:

Introduction and Agent Background

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been employed with the FBI since July of 2016. I served as an FBI Honors Intern in college where I was assigned to the Behavioral Analysis Unit Counter Terrorism squad in Northern Virginia. I was later assigned to the Bryan, Texas resident agency where I assisted with violent crime and counter terrorism investigations. In August 2017, I became an Investigative Specialist (IS) and served as an IS for 5 years in the Kansas City Field Office. As an IS, I provided surveillance in support of a broad range of critical security priorities including white collar crime, domestic and international terrorism, counterintelligence, violent crimes against children, and cyber investigations. I became a Special Agent in December 2022. As a Special Agent, I have received extensive specialized training including completing the 18-week New Agent Training course at the FBI Academy in Quantico, Virginia. This course provides a comprehensive, high-level training in advanced law enforcement techniques related to the detection and interdiction of cybercrimes, criminal enterprises and aggravated felony offenses. I am currently assigned to the Portland Field Division where I am a member of the Violent Crime Squad and further assigned as the Portland Field Office Bank Robbery Coordinator. In this capacity, I investigate, a variety of violations to include bank robberies, Hobbs Act Robberies, felon in possession violations, scams, extortion, sextortion, federal assaults, threats, threatening communications, and other federal violations.

2. I submit this affidavit in support of a criminal complaint and arrest warrant charging CARL ANDREW VERMILYA (hereinafter “VERMILYA”), with Bank Larceny, in violation of 18 U.S.C. § 2113(b). As set forth below, I have probable cause to believe that VERMILYA committed that crime.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

Applicable Law

4. **18 U.S.C. § 2113(b) Bank Larceny** prohibits a person from knowingly and unlawfully taking or attempting to take currency or any other thing of value from the person or presence of employees of a credit union or bank whose deposits are insured by the Federal Deposit Insurance Commission (FDIC). If the amount taken does not exceed \$1,000, the offense is a Class A misdemeanor.

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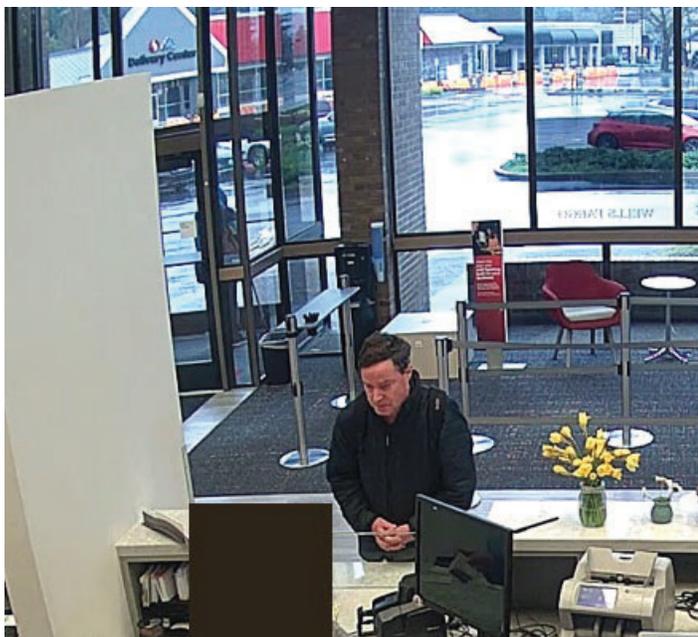
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Statement of Probable Cause

5. Based on conversations with sworn law enforcement officers, review of Washington County Sheriff's Office (WCSO) reports, and review of the Wells Fargo security camera images, I am aware of the following:

6. On Thursday March 12, 2026, at approximately 11:20am, a robbery occurred at Wells Fargo, located at 6785 SW Beaverton Hillsdale Highway, Portland, Washington County, Oregon 97225. The money deposited at this bank is insured by the FDIC.

7. The victim teller (Victim Teller 1 or VT1) reported to Washington County Sheriff's Deputy Kayne Carpenter, that a subject, unknown to VT1 and hereinafter referred to as "the suspect", entered the Wells Fargo when VT1 was helping an unrelated customer. The suspect waited behind the unrelated customer that VT1 was assisting. VT1 noted the suspect's demeanor was suspicious based on his slow casual strut into the bank and the way he looked around the bank. When the unrelated customer departed VT1's workstation, VT1 had twenty \$50 bills in their hand. The suspect walked up to VT1's workstation and said in a soft tone, "This is a robbery." VT1 was surprised by the comment and did not reply. The suspect then said, "Give me your large bills." The suspect had nothing in his hands and just stood at the workstation. VT1 handed the twenty \$50 bills, totaling \$1,000, to the suspect. The suspect took the cash and walked out of the Wells Fargo. VT1 reported being afraid during the transaction stating, "It just sinks your stomach because you don't know. I've had knives pulled on me and guns. So you don't know what they're going to do."



Above is a screenshot of the suspect at the workstation of VT1. The photograph is edited to include a black square to obscure VT1's appearance.

8. Another victim teller (Victim Teller 2 or VT2) reported to Deputy Carpenter that they were standing next to VT1 during the robbery. VT2 confirmed VT1's recollection of the robbery with little to no variance. VT2 maintained visual contact with the suspect after he left Wells Fargo. The suspect walked across the parking lot of the bank and stopped a short distance away near a neighboring business. The suspect remained there until being detained by law enforcement.

9. Another victim teller (Victim Teller 3 or VT3) reported to Deputy Carpenter that they were working at the desk next to VT1. VT3 heard the suspect tell VT1 "This is a robbery" twice and they also heard the suspect ask for large bills.

10. WCSO Deputy Mikhail Gerba responded to the robbery at Wells Fargo. While in route to the Wells Fargo, Deputy Gerba was informed that the suspect took \$1000 cash and was a

white male wearing a black jacket and red beanie. Deputy Gerba was informed that the suspect exited the bank, walked across the Wells Fargo parking lot and was standing in front of the Safeway distribution center in the vicinity of Wells Fargo. The reporting party, VT2, maintained visual contact with the suspect after he departed the bank. VT2 remained on the phone with WCSO dispatch providing them real time observations of the suspect. Deputy Gerba arrived in the vicinity of the Safeway distribution center and observed the suspect based on the provided description. Deputy Gerba was driving a marked WCSO patrol vehicle with activated red and blue emergency lights when he made contact with the suspect. Deputy Gerba detained the suspect in handcuffs. Deputy Gerba conducted a search incident to arrest of the suspect. The suspect had \$1,000 cash in his front right pocket. The suspect was identified as CARL ANDREW VERMILYA by the driver's license found on the suspect.



Above is the DMV photo of VERMILYA taken in January of 2019.



Photo taken by WCSO of VERMILYA after he was detained on March 12, 2026.

11. Deputy Gerba informed me that WCSO deputies conducted a “show up” with one of the Victim Tellers and VERMILYA in the vicinity of the Wells Fargo. The victim teller confirmed VERMILYA was the suspect during the show up.

Conclusion

12. Based on the foregoing, I have probable cause to believe CARL ANDREW VERMILYA committed bank larceny in violation of 18 U.S.C. § 2113(b). I therefore request

that the Court issue a criminal complaint and arrest warrant charging VERMILYA with that offense.

13. Prior to being submitted to the Court, this affidavit, the accompanying application, and the requested criminal complaint were all reviewed by Assistant United States Attorney (AUSA) Pamela Paaso, and AUSA Paaso advised me that in her opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant.

/s/ Ethan Etter by Phone
ETHAN ETTER
FBI Special Agent

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at

9:03 a.m./p.m. on March 13, 2026.



HONORABLE STACIE F. BECKERMAN
United States Magistrate Judge