

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

| | | |
|--------------------------|---|-----------------|
| UNITED STATES OF AMERICA |) | MISC. NO. _____ |
| |) | |
| v. |) | |
| |) | |
| Angelo Jerome Brown |) | |

Affidavit in Support of Criminal Complaint

I, Federal Bureau of Investigation (FBI) Special Agent Kevin E. Conroy, being duly sworn, depose and state that:

1. I am a Special Agent (“SA”) with the Federal Bureau of Investigation (FBI), United States Department of Justice, and have been so employed since 1995. I have served on the drug and violent crime squad in Columbia, South Carolina from November 2008 until present. Prior to that, I served on a Violent Crimes/Major Offenders task force in New York, New York, in the White Plains Resident Agency. As a case agent, I have prepared and sworn to Title III affidavits and participated in the preparation of several other Title III affidavits for the FBI that were utilized in major narcotics and gang investigations. As part of my duties as an FBI Special Agent, I have participated in investigations involving the use of Title III wiretaps on more than 75 target telephones. As an SA, I have been involved in several investigations involving various schemes that resulted in the issuance of seizure warrants, search warrants, and arrest warrants. In 2004, the FBI formed the Columbia Violent Gang Task Force (“CVGTF”). The CVGTF is an FBI led joint task force consisting of the FBI, South Carolina State Law Enforcement Division, Richland County Sheriff’s Department, Columbia Police Department, and Lexington County Sheriff’s Department. I am the Coordinator of the CVGTF and one of the lead case agents for the task force investigations.

2. This Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint. I have not included each and every fact known by the government concerning criminal activities committed by the defendant.

Federal Offenses

3. I respectfully submit there is probable cause to believe that on or about December 23, 2022, Angelo Jerome Brown (“Brown”) violated the following federal statutes: assimilative crimes (specifically, failure to stop for a blue light and siren 2nd offense, in violation of S.C. Code of Laws, § 56-5-750, and assault and battery in the second degree, in violation of S.C. Code of Laws, § 16-3-600(D)(1)(a)), in violation of 18 U.S.C. § 13; assault on federal officers, in violation of 18 U.S.C. § 111(a)(1); entering military property, in violation of 18 U.S.C. § 1382; and possession of a dangerous weapon in a federal facility, in violation of 18 U.S.C. § 930(a).

December 23, 2022, Incident

4. On December 23, 2022, Brown approached the main entrance to the Shaw Air Force Base in Sumter, South Carolina to await entry. Brown is a retired military veteran from the Army

who retired with the rank of E3. As a retired veteran, Brown had access to Shaw Air Force Base as long as he submitted to the rules and regulations allowing entrance. Brown presented a valid Department of Defense retired ID at the gate. The on-duty officer at the gate advised that Brown started making a “rapid utterance in an aggressive tone.” Brown mentioned sex slave trafficking and kid sex slaves and told the guard that he was “laced.” The guard convinced Brown to pull his vehicle to a side lot. As the guard was waiting on a supervisor, Brown became irate and threatened to pull off. Brown also stated, “I have a knife and BB gun in the car.”

5. While the guard was waiting on a supervisor, Brown accelerated away from the officer and drove through the gate. The officer attempted to notify another officer to activate the barrier to prevent Brown from entering; however, Brown was able to get through the gate before they could activate the barrier.

6. Multiple officers from Shaw Air Force Base responded toward the gate and were able to locate Brown’s vehicle near a traffic circle approximately $\frac{3}{4}$ to 1 mile from the main gate. Officers activated their red and blue lights, along with sirens. Once the traffic stop was initiated, Brown initially pulled over. Once stopped, Brown exited his vehicle and belligerently yelled at the officers who stopped him. During the three to five minutes that Brown was stopped, he also threw the key fob from the vehicle.

7. Brown then got back into his vehicle and backed up, striking an officer with the door. The impact caused the officer to fall backwards, but he did not sustain injuries. Brown then fled in his vehicle. However, a short time later, the vehicle shut off and stopped as it was no longer in range of the key fob that Brown had thrown out of the car earlier.

8. The officers took positions of cover around Brown’s vehicle, primarily perpendicular to the passenger side. Brown once again exited the vehicle and walked to the rear of the car and pulled what appeared to be a firearm from the backseat of the vehicle. Officers observed Brown holding what appeared to them to be a rifle. Initially Brown did not point the rifle at the officers. Brown disobeyed commands by the officers for him to drop the rifle and he continued making statements about sex trafficking and girls. Officers requested a negotiator come to the scene; however, after a short period of time, Brown pointed the rifle at the officers. Once Brown pointed the rifle at officers, officers fired at Brown, injuring him. Officers were then able to take Brown into custody.

9. Officers immediately rendered aid to Brown at the scene. Brown told officers that he didn’t want help and that he wanted to die. Brown made a statement about the officers needing to “get them girls from Columbia.” He also threatened to take one of the officer’s guns and shoot him with it, although he made no physical attempt to do so. In addition, Brown told an officer that if he gets his hands on another weapon, he was coming back for them.

10. Brown was transported to a hospital in Richland County, where he is currently in stable condition.

11. The Columbia FBI Evidence Response Team (“ERT”) responded and processed the crime scene. They located the rifle that Brown had been in possession of and determined that it was a black pellet gun and that it did not fit the definition of a working firearm. Brown was also found to be in possession of a knife with a blade measuring 6 $\frac{1}{2}$ inches. Additionally, within Brown’s vehicle, they recovered a rock-like substance believed to be consistent with cocaine base

(commonly known as “crack cocaine”). The substance was not field-tested at the scene.

12. For purposes of the Assimilated Crimes Act set forth in 18 U.S.C. § 13, Shaw Air Force Base, which is located in Sumter, South Carolina, within the District of South Carolina, is within the “special maritime and territorial jurisdiction of the United States” as it falls within the definition set forth in 18 U.S.C. § 7(3) as a land reserved or acquired for the use of the United States, and under the exclusive or concurrent jurisdiction thereof.

13. Brown has prior convictions in South Carolina, including a prior conviction for failure to stop for a blue light and siren in 2002. Therefore, his failure to stop for blue lights and siren on December 23, 2022, would constitute a second offense under S.C. Code of Laws §§ 56-5-750(A) and 56-5-750(B)(2).

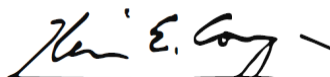
14. While on Shaw Air Force Base, Brown was in possession of a dangerous weapon, to wit: a pellet rifle and also a knife with a blade longer than 2 ½ inches in length.

15. Following the incident, investigators spoke with Brown’s sister, who advised that this past Saturday (December 17, 2022), Brown asked her for her gun. She further advised that she told him no because she knew that he was a prohibited felon and not allowed to have a firearm.

Conclusion


16. Based on the above, I respectfully submit there is probable cause to believe that Angelo Jerome Brown violated the statutes listed in Paragraph 3 on or about December 23, 2022. Considering the same, I respectfully request this Court issue a Criminal Complaint and Arrest Warrant for Brown charging the same.

I swear or affirm the above is true and correct to the best of my knowledge. Assistant United States Attorney Stacey D. Haynes has reviewed this affidavit.



Kevin E. Conroy
Special Agent
Federal Bureau of Investigation (FBI)

This affidavit was sworn to by the affiant, who attested to its contents pursuant to Fed. R. Crim. P. 4.1(b)(2)(A) by telephone after a document was transmitted by email pursuant to Fed. R. Crim. P. 4.1.


Honorable Shiva V. Hodges
United States Magistrate Judge