FILED
JUN 24 2014
At
ROBERT N. TRGOVICH, Clerk
U.S. DISTRICT COURT
NORTHERN DISTRICT OF INDIANA

United States District Court

NORTHERN DISTRICT OF INDIANA

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

SAMUEL L. BRADBURY

CASE NUMBER: 2:14MJ090

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about June 21, 2014, in Tippecanoe County, Indiana, in the Northern District of Indiana, defendant did

Extort and threaten-interstate communications, and wilfully threaten the use of explosive materials;

in violation of Title 18, United States Code, Sections 875(c) and 844(e).

I further state that I am a Special Agent, Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. (X) Yes ( ) No

Signature of Complainant
Special Agent Troy Wohlfert
FBI

Sworn to before me, and subscribed in my presence

June 24, 2014 at Hammond, Indiana
Date City and State

Andrew P. Rodovich
United States Magistrate Judge

S/Andrew P. Rodovich
Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Troy M. Wohlfert, a Special Agent with the Federal Bureau of Investigation, being duly sworn, hereby state as follows:

1. I have been a Special Agent of the Federal Bureau of Investigation since 2010. I am currently assigned to the Lafayette Resident Agency, of the Indianapolis Division, Federal Bureau of Investigation. As part of my duties, I investigate criminal violations related to Extortion and Threats - Interstate Communications in violation of Title 18 U.S.C. § 875(c) and 18 U.S.C.§844 (e) Willfully Threatening the Use of Explosive Materials. I received training in the area of criminal investigations pertaining to interstate communications violations, and have had the opportunity to investigate such crimes. I have also participated in the execution of arrest warrants involving investigations relating to violations of state and federal law.

2. This affidavit is made in support of a Criminal Complaint and Arrest Warrant for Samuel L. Bradbury, white, male, DOB: [redacted]1992, SSN: [redacted], who resides at 3[redacted]E Boulevard, Pine Village, Indiana, on charges of Extortion and Threats - Interstate Communications in violation of Title 18 U.S.C. § 875(c), which prohibits:

> Whoever transmits in interstate or foreign commerce any communication containing any threat to kidnap any person or any threat to injure the person of another, shall be fined under this title or imprisoned not more than five years, or both;

and Willfully Threatening the Use of Explosive Materials in violation of Title 18 U.S.C. § 844(e), which prohibits:

Whoever, through use of the mail, telephone, telegraph, or other instrument of interstate of foreign commerce, or in or affecting interstate or foreign commerce, willfully makes any threat, or maliciously conveys false information knowing the same to be false, concerning an attempt or

allege attempt being made, or to be made, to kill, injure, or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property by means of fire or an explosive shall be imprisoned for not more than 10 years or fined under this title, or both.

3. I am familiar with the information contained in the Affidavit based upon the investigation I have conducted. Because this Affidavit is being submitted for the limited purpose of securing a Criminal Complaint and Arrest Warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that violations of the Specified Federal Offense referenced above has been violated.

PROBABLE CAUSE FOR CRIMINAL COMPLAINT

4. On the morning of June 21, 2014 West Lafayette Police Department received information concerning a post made on Facebook by Sam Bradbury. On June 19, 2014 at approximately 11:00 p.m. Samuel Bradbury posted on his Facebook account, sam.bradbury.37, numerous threats to kill West Lafayette Police Officer Troy Greene, Sheriff Tracy Brown, Judge Les Meade, and Judge Loretta Rush. The post was the following:

> "I can't keep silent on this conspiracy anymore. I have to reveal some truth. My buddy and comrade Ant has been catching some flack for some of his posts about killing cops. I have to let out the truth. Jerad and Amanda Miller were losers. They were part of out group, the 765 Anarchists, the town's cop killing group run by none other than myself, Sam Bradbury. When we discovered that Jerad and Amanda were CIs and in with the boys in blue, we sent them out to the Bundy Ranch to cause controversy elsewhere because we didn't need them

snitching on our business. I hadn't heard from him since that event, but some of our comrades gave the command and that's why Jerad and Amanda miller killed those cops in Las Vegas. I thought Jerad was cool, but [redacted] him, he was a CI. Great job I must say, but not what we wanted. We, the 765 Anarchists, including myself and Ant are part of a much larger plot that we've been forming for years to kill cops in the local area, and specifically to take out WLPD Officer Troy Green and Tippecanoe County Sheriff, Tracy Brown. Jerad and Amanda were just following 765 Anarchist group orders, but they had fallen out of favor with the group after we discovered they were working with police as confidential informants. While we are glad that they killed some police, the 765 Anarchists are looking to make waves in the 765 area, specifically Lafayette. The top two on our hit list are Troy Green of the WLPD and Tracy Brown, Tippecanoe County Sheriff. We have field agents out currently gathering information and planning the attack. We have gathered enough thermite and explosives that we intend to not only kill those two pigs and any others that get in our way, but also to cause extreme damage to the county's various offices' equipment, including police cars and police buildings. Before the month is over, we intend to incinerate and destroy no less than 6 police cars, as well as the Tippecanoe County Courthouse, with hits specifically targeted on Judge Les Meade and Judge Loretta Rush also. The courthouse will be blown to pieces within the month, we have agents operating all over the city, and some all over the country. Ant is nothing more than a fall boy, although we do have plans to use him in a suicide strike on the police or a suicide bombing on a local police building before we are through. Our arsenal is massive, and our group has well over 50 supremely dedicated members who are willing to die. I can't let this story go on falsely anymore, Jerad and Amanda Miller didn't do [redacted] they were outcasts of the group, but they brought us the attention we needed. I, Sam Bradbury, am

responsible for the organization of the group and the acquisition of the chemical weapons, incendiaries, explosives, munitions, and general arms. We will not stop this plan, we will cause chaos and terror. We will destroy the Tippecanoe County Courthouse in a blaze of glory and we will take out Tippecanoe County Sheriff Tracy Brown, no matter what the cost, even if we lose all of our members in the process, we will not go down without a fight and causing serious damage. So watch out, the cop killers are out. The 765 Anarchists are going to purge the vile pig scum from this land and restore constitutional rights to the people. Call us crazy, call us killers, call us heroes and patriots. We're okay with all of it. Remember - KILL COPS, STICK PIGS, AND WATCH OUT FOR THE 765 ANARCHISTS, INCLUDING SAM BRADBURY AND ANT!

(FREE SPEECH EXERCISE FOOLS)"

5. On the evening of June 21, 2014 West Lafayette Police Department conducted a search warrant at 3[redacted] East Boulevard, Pine Village, Indiana for "cell phones, computers, tablets or any other item capable of internet connection, thermite or other explosive materials, bomb-making components, firearms and ammunition." During the search of Bradbury's room, three bags of aluminum powder, according to the label weighing 115 grams each, were found. In close proximity to the aluminum powder, three bags of black iron oxide, according to the label weighing 345 grams each, were also found. Black iron oxide and aluminum powder are both precursors used in the making of thermite. Also found was an unidentified unmarked bag similar in size, color, and consistency as the black iron oxide. Two unidentified devices were also found, these devices are wrapped in duct tape with a needle protruding at one end.

6. Thermite is an incendiary material that is created when aluminum powder and iron oxide are mixed together. To create an improvised incendiary device, the two precursors are placed in any container and ignited. Once ignited, the thermite produces a tremendous amount of heat and molten slag, sufficient to burn through metal, and very difficult to extinguish. Once so configured, this incendiary device can function on its own, or be used as part of a larger explosive device.

7. Numerous other items of interest were found during the search as well. Investigators found an open and unsaved Notepad document on a desktop computer in Bradbury's room that contained the exact same text that was posted on Bradbury's Facebook page. This computer had access to the internet; investigators found Mozilla Firefox Internet browser open that contained tabs with internet searches as follows: "jerad and Amanda Indiana", "tippecanoe county sherrif", and "judge rush Indiana". In the Google search toolbar contained the text "les meade". All of these individuals are specifically mentioned in the Facebook threat posted. Handwritten documents were also found in notebooks during the search of Bradbury's bedroom with the text "Kill Politicians, Please. I'm Serious", "[redacted] the Police", "Kill Cops" "Could someone please kill a cop today or even just a sycophant". Multiple documents contained poems with strong anti-law enforcement and anti-government statements were found as well. Below are excerpts from some of these poems:

"Cuz if there was another me, then I could phone he
And organize a movement that'll halt the police force
And my soldiers kill cops just to keep the plan on course
Don't matter if the pigs in a dodge or riding a horse
I'll take out every last one without any remorse

Cuz I've been robbed by the cops, caged by the system

And if I killed those [redacted] would anybody miss 'em

Maybe, just maybe, the last ones who kissed 'em

I've killed so many badges that I can't even list 'em

Officers Decker, Brown, White, and Green

The worst four scoundral's that I've ever seen"

And:

"And I wouldn't mind snipin' a cop

And I'm not saying I promote violence

But when you kill for fun, you need to be silenced

So I'm hoping some one out there has the [redacted] to do it

Commit to kill a cop, and the stick to it

Extra points if you manage to take out a fed

And double extra points if you cleave off his head"

8. Investigators also were able to view posts Bradbury made in response to other individuals responses to his above post. Bradbury made the following two posts:

"This is an exercise in free speech, protected by the first amendment of our Constitution. Take it as what you will, this is simply a free speech exercise. Are any of these plans real? Not as far as I know. But it's protected free speech."

"Just to let everyone know: this is complete satire and an exercise of whether or not free speech still exists in America. This post uses real names, but everything else is fake. There is no group, there are no weapons or bombs, and there is no plot. This is simply a big mind game and satirical joke. I apologize if I offend anyone, it's made to get you to think."

9. Amanda Burton, Probation Officer for Bradbury stated that he has expressed to her a strong dislike of police and has made anti-government statements. She recalled him telling her that he does not feel the government should have the authority to say what he can and cannot do.

10. West Lafayette Police Department attempted to question Bradbury, but Bradbury requested a lawyer before any questioning could begin. Prior to questioning Bradbury stated that "the only thing I can think was a joke that I made", "the only thing I can think is that you're going for a Facebook post" referencing why he thought he was brought to the police department.

CONCLUSION

11. Based upon the above information, I respectfully assert that a factual basis exists to support a probable cause finding that BRADBURY violated 18 U.S.C. § 875 (c) Extortion and Threats-Interstate Communications and 18 U.S.C. §844(e) Willfully Threatening the Use of Explosive Materials.

Special Agent Troy Wohlfert
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO
before me this 24th day of June 2014

S/Andrew P. Rodovich

Andrew P. Rodovich
United States Magistrate Judge
Northern District of Indiana