

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Kansas

United States of America

v.

JARRETT WILLIAM SMITH

Case No.

19-mj-5105-ADM

Defendant(s)

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(s) of Aug 21, 2019 to Sept 20, 2019 in the county of Geary in the District of Kansas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. 842(p)

Distribution of Information Related to Explosives, Destructive Devices, and Weapons of Mass Destruction

This criminal complaint is based on these facts:

See attached Affidavit

Continued on the attached sheet.

Complainant's signature

SA Brandon LaMar, Federal Bureau of Investigation

Printed name and title

Sworn to before me and signed in my presence.

Date: September 23, 2019

Judge's signature

Judge's signature

City and state: Kansas City, Kansas

Hon. James P. O'Hara, Chief US Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
DISTRICT OF KANSAS

UNITED STATE OF AMERICA,
Plaintiff,

v.

Case No. 19-5105-ADM

JARRETT WILLAM SMITH,
Defendant.

AFFIDAVIT IN SUPPORT OF COMPLAINT

1. I, Brandon LaMar, your affiant, am a Special Agent with the Federal Bureau of Investigation ("FBI"), and have been employed as a Special Agent with the FBI since July of 2018. I am currently assigned to the FBI Manhattan Resident Agency, Kansas City Division. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. I am currently assigned to the FBI Joint Terrorism Task Force (JTTF) and I am tasked with investigating both international and domestic terrorism. As a Special Agent with the FBI, I have participated in and conducted several investigations of violations of various Federal and State criminal laws, and participated in the preparation and/or execution of search, arrest, and seizure warrants, all in violation of Title 21 and Title 18, United States Code. I am a graduate of the FBI Basic Field Training Academy in Quantico, November 16, 2018.

2. I respectfully submit this affidavit in support of a Complaint alleging that JARRETT WILLIAM SMITH has committed the offense of Distributing Information Relating to Explosives, Destructive Devices, and Weapons of Mass Destruction, in violation of Title 18, United States Code, Section 842(p).

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other Law Enforcement and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested Complaint and does not set forth all of my knowledge about this matter.

4. On March 27, 2019, the FBI received information regarding the Facebook user ID 100000714556127, belonging to JARRETT WILLIAM SMITH. SMITH was reported to have disseminated guidance on how to construct Improvised Explosive Devices (IEDs) and to have spoken about his desire to travel to Ukraine to fight with the Ukraine-based violent far-right paramilitary group, Azov Battalion.

5. JARRETT SMITH joined the U.S. Army on June 12, 2017. Following his initial entry training at Fort Benning, Georgia, SMITH proceeded to his first duty station on November 27, 2017, at Fort Bliss, Texas. SMITH serves the U.S. Army as an infantry soldier, trained in combat and tactical operations, and he presently is a private first class. SMITH transferred to Fort Riley, Kansas on July 8, 2019.

6. JARRETT SMITH is connected via social media (Facebook) – and on one occasion had an in-person meeting in El Paso, Texas – with Craig Lang. Lang has traveled to Ukraine and fought with the Right Sector, another group in Ukraine similar to the Azov Battalion, between 2017-2019. Facebook communications received by the FBI highlight Lang’s mentorship to SMITH as he prepared for SMITH to join him in the fighting in Ukraine.

7. On June 23, 2016 (before SMITH enlisted in the U.S. Army), SMITH and Lang engaged in a conversation over social media indicating SMITH’s desire to fight in Ukraine:

- a. SMITH stated, “No former military experience, but if I cannot find a slot in Ukraine by October I’ll be going into the Army... To fight is what I want to do. I’m willing to listen, learn, and train. But to work on Firearms is fine by me too.”
- b. Lang responded, “Alright, I’ll forward you over to the guy that screens people he’ll most likely add you soon [...] Also as a pre-warning if you come to this unit and the government comes to shut down the unit you will be asked to fight. You may also be asked to kill certain people who become on the bad graces of certain groups.”

8. On December 8, 2018 (after SMITH enlisted in the U.S. Army), SMITH led a group chat on Facebook, with Lang included, discussing his ability to build IED’s.

- a. "Oh yeah, I got knowledge of IEDs for days. We can make cell phone IEDs in the style of the Afghans. I can teach you that..." SMITH went on to provide instruction on how to construct a cell phone detonator for an IED that, according to an FBI Special Agent Bomb Technician with whom I consulted, is accurate.
- b. A group member asked about the explosive, to which SMITH replied with a description of how to manufacture an explosive material using the heads of matches. According to an FBI Special Agent Bomb Technician with whom I consulted, SMITH's instructions are not accurate if the wrong type of matches are used. They are accurate, however, if the right type of matches were to be used.

9. On August 19, 2019, SMITH engaged with a Confidential Source (hereafter referred to as the CS) in an online chat group and discussed a plan of conducting an attack within the United States and that he was looking for more "radicals" like himself. SMITH talked with the CS about killing members of the far left group, Antifa, as well as destroying nearby cell towers or local news station.

10. On August 21, 2019, SMITH told the CS that the headquarters of a major American news network would be a suggested target, utilizing a vehicle bomb:

- a. SMITH: [major news network] headquarters.
- b. CS: That would make a statement.
- c. SMITH: A large vehicle bomb. Fill a vehicle full of [various explosive materials], then fill a ping pong ball with [commonly available chemical] via drilling then injection. Put the ball in the tank of the vehicle and leave. 30 minutes later, BOOM. [According to an FBI Special Agent Bomb Technician with whom I consulted, SMITH's instructions would not result in a viable explosive device].

11. On September 20, 2019, SMITH engaged with an FBI Undercover Employee (UC), with SMITH utilizing the moniker Anti-Kosmik 2182, on Telegram:

- a. SMITH: Hey brother, [PROTECT IDENTITY] said you may have a use for my knowledge and told me to contact you. What's up?

- b. UC: Thanks brother. Have an idea. Just don't know the specifics on how to build it. [PROTECT IDENTITY] said you knew your shit and would be someone good to talk to.
- c. SMITH: What do you have in mind?
- d. UC: Something that has enough power to take out a car and anything inside and something stable easy/enough to take from OK to TX?
- e. SMITH: Ok. I think I have an idea for you. You will need [various household chemicals and commonly-available equipment]. You can keep all the materials separate until it's time. Plus the randomness will aid you in the case of searches and the materials themselves usually aren't considered suspicious.

[SMITH then gave further, very specific instructions for the construction of an explosive device. According to an FBI Special Agent Bomb Technician with whom I consulted, however, SMITH's instructions would not result in a viable explosive device.]
- f. UC: I am reading and thinking but this looks really good. I like the fact that everything is stuff you find around the house.
- g. SMITH: That's the best way to fight people. Making AK-47s out of expensive parts is cool, but imagine of you will if you were going to WalMart instead of gun store to buy weapons.
- h. UC: Perfect.
- i. SMITH: Are you looking for any other interesting tricks?
- j. UC: I'll take anything you got. This is not my area of expertise. Just want to make sure the target is gone.
- k. SMITH: What's the target?
- l. UC: TX politician
- m. SMITH: What level? Mayor? State rep? Senator?
- n. UC: I have a few. Primary, secondary, tertiary. Ideally, fed Gov, Congress. But know I can get close on other. Been looking.


- o. SMITH: You would need [various chemicals and equipment], a large amount of either black powder or smokeless powder, and a cell phone with active service.
- p. UC: I got money. Just need the knowledge. I was thinking of something stable so I could drive down but I could construct it down there.
- q. SMITH: I'll include the instructions. This is a Middle East style bomb that if big enough or connected to the right explosive can damage or destroy US military vehicles. Most of the time it can obliterate civilian vehicles and people nearby.
- r. SMITH: [SMITH then gave further, very specific instructions for constructing an explosive device, all of which have been determined by an FBI Special Agent Bomb Technician to be viable. At the end, SMITH cautioned: "Be very careful with the fully armed device. There have been cases where Middle Eastern insurgents built these bombs only for them to detonate prematurely because of telemarketers or people with wrong numbers who unwittingly called the devices and ended up accidentally blowing up the insurgents."]
- s. UC: This is incredible. Thank you.
- t. SMITH: If you want a quick and cheap gas grenade, a [combination of commonly available chemicals] will work. [Instructions for activating the device]. Blows in 8-15 seconds. One hell of a wallop and it leaves behind a cloud of toxic chlorine gas.
- u. UC: Having these ideas opens up my thinking. Take all that you got and appreciate it.
- v. SMITH: Last one for a quick incendiary/HE grenade. Tape a firecracker to a [commonly available household item]. You only need one for good effect, but you can get a HUGE explosion and a good fire going if you can tape 4 or 5 together. Simply ignite the firecracker and throw the device. Hope you're fast on your feet, this one also gets loud. I consulted an FBI Special Agent Bomb Technician, who told me this recipe would likely result in construction of a viable device, although he believes anyone using this device would be within range of the device when it exploded.
- w. UC: Well I'd be the fastest moving Aryan you ever seen. But, also awesome idea. Got a liberal texas mayor in my sights! Boom with that IED and that dude's dead.
- x. SMITH: There ya go.

- y. UC: You got anyone down in Texas that would be a good fit for fire, destruction and death?
- z. SMITH: Outside of Beto? I don't know enough people that would be relevant enough to cause a change if they died.

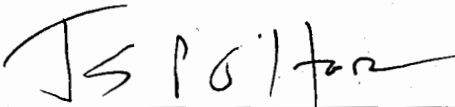
12. SMITH was arrested on September 21, 2019. In a Mirandized interview prior to his arrest, SMITH admitted to me that he knows how to make improvised explosives devices, and that in online chat rooms he routinely provides instruction on building explosive devices. He admitted that he provides this information even to individuals who tell him they intend to use the information to cause harm to others. SMITH stated that he did this to cause "chaos." He told me that if chaos results in the death of people, even through information he provided, it doesn't affect him.

13. Based on the information listed above, I respectfully submit there is probable cause to believe that SMITH has distributed information relating to explosives, destructive devices, and weapons of mass destruction, in violation of Title 18 U.S.C. § 842(p)

I swear under penalty of perjury, that the foregoing is true and correct,


Special Agent Brandon LaMar
Federal Bureau of Investigation

Subscribed and sworn to before me on September 23, 2019, at Kansas City, Kansas.


Honorable James P. O'Hara
CHIEF U.S. MAGISTRATE JUDGE
District of Kansas